



Changing the Narrative

Challenging the Impact of the No Recourse to Public Funds Rule and Conditions on Black, Minoritised and Migrant Women Facing Gender-Based Violence in the UK

An Evaluation of the No Recourse? No Safety! Project and Partnership

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**End VAWG
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SUPPORTING
FRONTLINE SERVICES
TO END VIOLENCE
AGAINST WOMEN &
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ACKNOWLEDGEMENTS

This report sets out the findings of an independent evaluation of the No Recourse? No Safety! project led by five specialist led *by and for* Black, minoritised and migrant ending violence against women and girls (VAWG) organisations: Southall Black Sisters, Safety4Sisters, Latin American Women's Rights Service, Ubuntu Women Shelter and the Angelou Centre. The evaluation, by End VAWG Consultancy, aims to centre the lived experiences and voices of Black, minoritised and migrant victim-survivors of violence and abuse, whilst honouring the work of the consortium of partners who undertook the project.

My deepest thanks are extended to the No Recourse? No Safety! project partners: the victim-survivors, staff, consultants and stakeholders for their open and honest insights. Throughout the process they were both supportive and generous with their time.

“This project has been a lifeline to keep our campaigning going, it’s the core of all we do ...second tier and generic services have specific funding streams to support their campaigning and lobbying, but they never listen to the women, never truly consider NRPF although they like to co-opt our words in their policy and reports.”¹

This report is dedicated to migrant women and children victim-survivors with No Recourse to Public Funds (NRPF), and to the project partners whose commitment in working to end violence against Black, minoritised and migrant women and girls is resolute. Without the dedicated and tireless work of each of the No Recourse? No Safety! partnership organisations, the migrant victim-survivors without recourse to funds featured in this evaluation would have been unable to share their experiences. Without Southall Black Sisters, Safety4Sisters, Latin American Women's Rights Service, Ubuntu Women Shelter and the Angelou Centre many would not have survived.

¹ All No Recourse? No Safety! Partner quotes in blue type are taken from meetings, workshops and interviews with the No Recourse? No Safety! project partners Southall Black Sisters, Safety4Sisters, Latin American Women's Rights Service, Ubuntu Women Shelter and the Angelou Centre.

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EXECUTIVE SUMMARY

“No one is helping us...we trusted the UK government when we arrived, they said they care about women and children, but then they don't care when we are migrant and suffering.”²

No Recourse? No Safety! was a three year project funded by Comic Relief's Change Makers programme that ran between September 2021 and August 2024.³ The project focused on strategically advocating and campaigning for the rights of migrant victim-survivors of gender-based violence subject to the No Recourse to Public Funds (NRPF) rules and conditions that exclude them from safety and protection in the UK.⁴ In the context of (post) pandemic austerity, an expansion of the hostile environment and the exclusion of migrant women from key legislative and policy frameworks, the project sought to leverage the future restitution and inclusion of migrant victim-survivors' right to safety, protection and societal access.⁵ The No Recourse! No Safety! project sought to further embed the partnership's continued and combined efforts to better establish the rights of Black, minoritised and migrant women with NRPF at local grassroots and regional levels within the wider discourse of national public policy and legislation.

Together, the five organisations (Southall Black Sisters, Safety4Sisters, Latin American Women's Rights Service, Ubuntu Women Shelter and the Angelou Centre) formed a strong cross regional coalition based on their service delivery and frontline service alignment, values, ethics and secular Black feminist positioning. This collective and shared stance enabled them to challenge and confront issues at both community

² All purple quotes have been taken from in person evaluations with victim-survivors conducted both specifically for the report as well as part of the wider project. These quotes and case studies have been anonymised for the safety of the women involved. All women gave permission for their quotes to be used anonymously in the project and the report.

³ <https://www.comicrelief.com/news/gbp9-1million-awarded-to-20-specialist-projects-to-tackle-homelessness-abuse/>

⁴ The NRPF Network definition of NRPF: “A person will have no recourse to public funds when they are ‘subject to immigration control’. A person who is subject to immigration control cannot claim public funds ([benefits and housing assistance](#)), unless an exception applies. Section 115(9) of the Immigration and Asylum Act 1999 states that a person will be ‘subject to immigration control’ if they have one of the following types of immigration status:

- Leave to enter or remain, which has a ‘No Recourse to Public Funds’ (NRPF) condition
- Leave to enter or remain that is subject to a maintenance undertaking
- Leave to enter or remain as a result of a pending immigration appeal
- No leave to enter or remain when they are required to have this

<https://www.nrpfnetwork.org.uk/information-and-resources/rights-and-entitlements/immigration-status-and-entitlements/who-has-no-recourse-to-public-funds>

⁵ The ‘Hostile Environment’ is a series of socio-cultural, legislative and political measures to limit access to work, housing, health-care, and other vital parts of citizenship or being part of civil society. It includes the incorporation of a surveillance like culture to socially police individual's migration status that is often racialised. It can also include a form of racism that is determined by ideological presumptions about ‘white’ British nationality and the retention of an often mythical or nostalgic idea of the nation state.

as well as statutory levels – locally, regionally and nationally. As a consortium of specialist led *by and for* frontline ending violence against women and girls (VAWG) organisations, the project has changed the narrative that informs the exclusion, violence and institutionalised abuse that the migrant women and children they support experience on a daily basis. Over the course of three socio-politically tumultuous years (2021-2024), the project has both delivered and exceeded its agreed outcomes, whilst being agile and responsive to a range of socio-political challenges and issues.⁶

The No Recourse? No Safety! project highlights the lack of substantive policy inclusion, funding, resources and investment in women’s specialist led *by and for* ending VAWG organisations that remain independent of the state. In many areas of the UK the defunding or closure of *by and for* organisations has exacerbated migrant victim-survivors’ exposure to high levels of exclusion, injustice, racism and violence. By evidencing and reflecting the No Recourse? No Safety Project! outcomes *Changing the Narrative* examines the barriers and challenges experienced by Black, minoritised and migrant led services that support women and children with NRPF. By centring the voices of migrant victim-survivors in policy-making and campaigning, the project speaks to and reflects their harrowing experiences and the many challenges faced by the organisations that support them. These organisations hold together the fabric of many local communities and ending VAWG ‘ecosystems’ providing invaluable prevention, crisis and recovery support whilst improving strategic pathways, decision-making and a public awareness of the rights of migrant women and children victim-survivors.⁷

The *Changing the Narrative* evaluation focuses on the evidence and outcomes produced by the partnership, the full strategic impact of the project and its ability to influence political, statutory, and public interventions for victim-survivors with NRPF. The evaluation report also reflects the No Recourse? No Safety! project’s vision to improve migrant women’s access to safety, protection, rights, subsistence, and support alongside their efforts to campaign for improved access to legal rights for migrant women. This vision is rooted in the partnership’s ambition to end the NRPF condition, and to improve ending VAWG practice and policy in this area. As a project, the No Recourse? No Safety! project builds an urgent case to end the ongoing

⁶ By socio-politically tumultuous years I am referring to a number of well documented, analysed and researched events that have changed both national and international politics. These include the international Covid-19 pandemic and lockdown which further exacerbated racialised and class-based health inequalities see : https://829ef90d-0745-49b2-b404-cbea85f15fda.filesusr.com/ugd/2f475d_6d6dea40b8bd42c8a917ba58ceec5793.pdf) and in a UK context, the cost-of-living crisis which disproportionately impacted women and increased women and children’s poverty particularly in the north of England, see: <https://www.wbg.org.uk/research-analysis/topics/cost-of-living-crisis/>

⁷ An understanding of specialist led *by and for* services being not only a ‘part’, but in fact *critical* to any multi-sectoral ‘community’ response to domestic and sexual abuse. Without specialist led *by and for* services there can in effect be no holistic ‘ecosystem’ of prevention, intervention and recovery that meets the full needs of victim-survivors.

strategic exclusion, statutory discrimination, systemic failure, and state neglect of women and children victim-survivors of abuse and violence with NRPF.

Project Need and Outcomes

The last few years (2021-2024) have seen major socio-political changes taking place in the aftermath of the Covid-19 pandemic and amidst a current cost of living crisis which is directly affecting the ending VAWG sector and the women and children who access support.⁸ More specifically, *by and for* services are effectively being de-funded whilst more corporate generic gender-neutral organisations are being commissioned despite a lack of evidence that they are able to support women in an effective rights based way.⁹ The introduction of the Domestic Abuse Act (2021) – considered by many to deliberately exclude migrant, disabled and marginalised women from equitable support, safety and protection – pre-empted the deleterious legislative advancement of the hostile environment, which culminated in the Nationality and Borders Act (2022), the Illegal Immigration Act (2023) and the Safety of Rwanda Act (2024).^{10 11 12} In addition, the ‘reservation’ of migrant women (Article 59) from the UK’s much stalled ratification of the Istanbul Convention in 2022 has further impeded the rights of migrant women and the Black, minoritised and migrant *by and for* organisations that support them.¹³ This government decision (which received cross party support) has been widely condemned by the ending VAWG sector and Reem Alsalem, the United Nations (UN)’s Rapporteur on Violence Against Women and Girls.¹⁴

The recent change of government in July 2024 (from the Conservative to the Labour party) has so far failed to reduce the growing hostility toward migrant communities or the lack of available funding for specialist ending VAWG services led by Black, minoritised and migrant women. This mainstream and social media fueled discord toward migrant communities has been worsened by increasing levels of poverty and

⁸ The Women’s Budget Group published an updated briefing on the impact of the cost of living crisis for the incoming government ahead of the elections in June 2024, in which they reported: *“Poverty rates are significantly higher among people from Bangladeshi, Pakistani and Black ethnic groups than among White people. Disabled people face higher costs on average resulting from their impairment or condition. Single parents, most of whom are women, tend to have lower savings and be more in debt than dual couple households with children. Victim/survivors of domestic abuse, including economic abuse, face greater barriers to leaving an abusive relationship. Women with ‘no recourse to public funds’ are excluded from claiming social security and therefore at high risk of poverty and destitution if they lose work or separate from a partner”*

<https://www.wbg.org.uk/publication/the-cost-of-living-and-gender-briefing-for-a-new-government/>

⁹ In February 2024, Women’s Aid reported on the impact of a decade long funding crisis: <https://www.womensaid.org.uk/domestic-abuse-services-struggling-to-fill-critical-gaps-in-a-challenging-landscape-exacerbated-by-the-rising-cost-of-living/>

¹⁰ <https://www.legislation.gov.uk/ukpga/2021/17/contents>

¹¹ <https://www.legislation.gov.uk/ukpga/2024/8>

¹² <https://www.legislation.gov.uk/ukpga/2023/37/contents>

¹³ <https://www.equalityhumanrights.com/uk-implementation-istanbul-convention-baseline-evaluation#:~:text=The%20UK%20ratified%20the%20Council,known%20as%20the%20Istanbul%20Convention.>

¹⁴ <https://www.endviolenceagainstwomen.org.uk/more-than-80-organisations-call-for-istanbul-convention-to-be-made-law-without-exceptions/>

health inequities across post-industrial regions in the UK (particularly in northern and rural regions), and fourteen years of austerity policies that inarguably played a pivotal and disturbing role in the recent far-right instigated riots.¹⁵ Against the backdrop of such substantive challenges, this evaluation aims to best represent the No Recourse? No Safety! project's impact at both infrastructural and strategic levels and to document the partnership's development, collaboration and campaigning work.

Evaluation Purpose

The *Changing the Narrative* evaluation seeks to reflect the ways that the No Recourse? No Safety! project has **changed the national discourse** around migrant women, centring their voices and concerns and innovating new ways of campaigning, evidencing and strategically advocating for tangible improvements to migrant women's rights. Where societal knowledge has increased, the legal and social mechanisms needed to address ensuing inequalities, and human rights abuses appear to have diminished. The project has therefore taken practical measures to re-evaluate and establish significant changes in the multi-sectoral, public, and political understanding of the NRPF rule and conditions. Developed over a twelve-month period (October 2023 to September 2024), the evaluation captures the full trajectory of the No Recourse? No Safety Project and the various stages of the project which included:

- Campaigning and policy advocacy – legal and policy interventions, including national and regional events, seminars and workshops that platformed, featured and centered the voices and lived material experiences of Black, minoritised and migrant women with NRPF
- The first financial cost-benefit analysis for the specialist *by and for* sector working on domestic abuse, immigration and NRPF
- The national delivery of statutory and multi-sectoral workforce training.
- The implementation of safe referral pathways for migrant women despite inhibitive national legislation
- Strategic litigation and test cases
- Regional and national media campaigns

The *Changing the Narrative* evaluation covers the full project term (three years) in line with the project's aims and objectives, monitoring, evaluation, and learning outcomes. The evaluation captures the data achievements, and impact of the project with a focus on the experiences and involvement of migrant victim-survivors. From the outset the No Recourse? No Safety! project had in place a robust due diligence framework overseen by the lead partner Southall Black Sisters, to which all partners adhered.

¹⁵ As the recent 2024 publication of the Woman of the North Research "It exposes the growing regional inequalities over the last decade and the impact this has on women's quality of life, health, work, their families and communities."
<https://www.healthequitynorth.co.uk/vast-inequalities-faced-by-women-in-the-north-of-england-exposed-in-report/>

There were four pillars to the project's strategic work that aligned with the partnership's 'Theory of Change' (for Theory of Change diagram see Appendix A):

Strategic Objectives	Planned Activities
1. Campaigning against the exclusion of migrant victim-survivors from legislation and the weakening of their legislative rights.	a) Year 1: Lobbying for key amendments to the Domestic Abuse Act and incorporation of key omissions. b) Year 2: Expansion of legislative rights of migrant women in accordance with the Act. c) Year 3: Full inclusion of expanded rights for all women regardless of status.
2. Further incorporation of CEDAW into UK domestic law and ratification of the Istanbul Convention to address rising levels of gender-based violence and inequality.	a) Year 1: Collective Interim Shadow Report (4 Nations). b) Year 2: Continued network activity to involve <i>by and for</i> sector/gather evidence. c) Year 3: Partners and sister <i>by and for</i> services present written evidence and testimonies to GREVIO. ¹⁶
3. Evidence from NRPf Support for Migrant Victims Pilot (2021-22) is used to advance recommendations for holistic recovery support for women who are victim-survivors of complex, compound trauma and discrimination.	a) Year 1: Pilot undertaken evidences need for specialist advocacy and holistic recovery access; a. Research, Policy Recommendations and Briefings provide evidence. b) Year 2: Legal challenge mounted regarding the NRPf rule and state failures to protect migrant women judicial review proceedings commence. c) Year 3: Review concludes that the current NRPf Ruling is illegal leading to systemic failures to protect migrant women from violence and abuse.
4. The impact of the pandemic and cost of living crisis on migrant women with NRPf informs the development of preventative measures to reduce destitution, social exclusion and the increased risk of homicide.	a) Year 1: Formation of key North/South networks and building a grassroots movement and digital imprint that includes Women's Voices 'Storywork', Testimony and Media content. b) Year 2 and 3: Development and deployment of Social Value or 'Gains Model' owned and utilised by the specialist <i>by and for</i> sector increases resources and strategic power. c) Year 3: Led <i>by and for</i> strategic networks present regional Public Sector Equality Duty (PSED) challenges to exclusion of migrant women from multi-sectoral access.

¹⁶ In the original bid there was a direct reference to representation and reports that would be aimed at Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) 2023. Although CEDAW was deferred until 2025, work still occurred on the ratification of the Istanbul Convention and reporting via the Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO) mechanism which were both in-person and via submission of detailed reports in line with CEDAW and other international obligations such as the Convention on the Elimination of Racial Discrimination (CERD).

KEY FINDINGS

The No Recourse? No Safety! project has produced the critical research, evidence and campaigning tools needed to “*affect a socio-political and economic shift in the national narrative around NRPF that is failing women at serious risk of harm, destitution, discrimination and death.*”¹⁷ The No Recourse? No Safety! project has demonstrated that there has been an ‘acute’ underestimation of the economic, human and social cost of the NRPF rules on migrant victim-survivors and the organisations that support them. The partnership has forged a strategic policy narrative and robust economic model that has produced systemic change. The project outcomes confirm that if such change is to be meaningful it must be victim-survivor-centric, must be led by frontline ending VAWG services led *by and for* Black, minoritised and migrant women that are able to authentically represent migrant women’s voices in their work.¹⁸

The following key findings and outcomes emerged during the *Changing the Narrative* evaluation:

1. Significant policy and procedural amendments have been developed and implemented during the course of the project; such as the extension of the Migrant Victims Domestic Abuse Concession (MVDAC), however limited, and strategic discussions with the Home Office to expand NRPF and status provision to all migrant victim-survivors (following the extension of the SBS administered SMV fund and evaluation); alongside the development of the Angelou Centre and Safety4Sisters’ Migrant Victim’s Pathways and LAWRS and SBS’s ongoing policy influence in relation to the introduction of a ‘firewall’ for migrant victim-survivors.¹⁹
20
2. The Investing in Safety model produced by the No Recourse? No Safety! project provides evidence that many financial models or ‘estimates’ around the cost of NRPF are incorrect and have failed to include statutory and multi-sectoral reliance on the specialist led *by and for* sector. As the Investing in Safety model reveals, huge savings are made annually by the state and multi-sectoral agencies in relation to women and children with NRPF. The expectations put on specialist services to support and protect migrant victim-survivors could be determined to be exploitative and inequitable.
3. Second tier and generic organisations, that have no direct interface with victim-survivors with NRPF, are often promoting fragmentary policy-making and strategic directives that are inaccurate and harmful. The concerns of grassroots *by and for*

¹⁷ Quote taken from the No Recourse? No Safety! original Comic Relief Change Makers programme funding bid submitted in 2020.

¹⁸ It should be noted that these organisations are often led by and also employ migrant women and victim-survivors with lived experience of NRPF conditions.

¹⁹ The evaluation will elaborate further on the concerns that SBS and the NRNS partnership have around the MVDAC limitations and restrictions, but this is unarguably a ‘step’ in the right direction.

²⁰ As a result of this work substantial policy and referral pathways have been developed across Northumbria, Surrey and Manchester police force areas.

organisations across regions such as the North East and Scotland are rarely listened to at a national level, nor promoted by corporate facing second-tier organisations. The inclusion of grassroots regional specialist *by and for* organisations in strategic advocacy and policy-making should be a mandatory requirement (and one considered by charitable funders when allocating funds for strategic policy-making, campaigning and rights-based advocacy).

4. The production of Safe Migrant Pathways by several partners during the project clearly evidences that policy-making from the grassroots and frontline can remedy local and regional issues and make immediate real-world change for migrant victim-survivors.
5. Despite legislative and policy barriers that are statutorily imposed, commissioners and local authorities are in urgent need of models of support to address growing numbers of victim-survivors with NRPF who face serious risk and harm; as evidenced by the success and demand for the Investing in Safety model, and willingness of commissioners and statutory leads to engage in a 2 year long development process.
6. Statutory and multi-sectoral agencies are continually breaching domestic safeguarding arrangements, PSED and the UK's international obligations (including the Istanbul Convention) due to a lack of knowledge, expertise and clear guidance or policy. As a result, the discriminatory conditions of the hostile environment, in which migrant women and children are being forced to exist, is now being extended to the grassroots specialist *by and for* ending VAWG sector.

Overview of the Report Content

The *Introduction* contextualises the project by considering current gaps in legislation and policy, thus anchoring the project in what has been a rapidly changing socio-political landscape since the project commenced. In raising socio-political inquiries, the report navigates the ways in which the project has had to continually adjust and draws attention to the inherent issues at hand. The *Introduction* sets the scene for a project that has successfully dealt with a range of highly complex legal and policy related issues through a victim-survivor-centric lens.

Chapter One, considers the course and development of the No Recourse? No Safety! project and its incorporation of a complex and nuanced approach to project design and delivery. The partnership's frontline anti-racist and ending VAWG expertise, and vast campaigning experience implicitly meant that an intersectional evaluation framework was applied. Research and learning were core elements of the project, in response to the many structural barriers and challenges that the partners faced when delivering the project. This will be considered alongside the evaluation aims and methodology.

Chapter Two is a reading of the project's data and statistics and what they tell us about the quality of the project. This chapter gets to the heart of the project seeing how far

the proposed ‘pillars of change’ and workplan was delivered and outcomes were met. It examines the ways in which the project strengthened and amplified the voices of NRPF victim-survivors through the centralised inclusion of Women’s Voices and case study story-work. It considers ways in which the project managed to deliver the planned campaigning, lobbying and policy work activity in order to secure a model of change. Although the project has produced a separate report dedicated to the Investing in Safety model, this chapter will also reflect on the development of the Investing in Safety model across the project life cycle.²¹

Chapter Three reflects on the annual project outcomes and impact on the partnership and wider network reach of the project. The effectiveness of the project in both a sector and wider stakeholder context was dependent on existing and new partnerships, campaigning collaborations, stakeholder input and sector networks. This chapter then brings the reader back to the successes and challenges of the project, by focusing on the full list of project campaigns. Using the evidence produced by case studies, interviews and testimonies, this chapter considers the real-world impact of the project at both a grassroots and strategic level, tracing the project back to the impact on victim-survivors, the partners and relevant stakeholders.

The *Conclusion and Recommendations* chapter considers the full scope and impact of the project and findings which have led to the recommendations outlined below.

Report Recommendations

1. Exploration of Innovative Projects that Centre Migrant Women and Children:

- a. The development of an ‘expert consortium’ that utilises the project’s learning and development to generate a future sustainable shared income. For example, rights-based systems training to improve multi-sectoral responses to migrant women subject to NRPF conditions.
- b. Resourcing the development of a migrant women’s rights and campaigning policy hub to capture and document the project’s knowledge and expertise.
- c. The incorporation of thematic areas of inquiry that emerged from the project into the development of new consortium projects.

2. Funding for Policy and Research from the Frontline:

- a. Further external investment in public policy and research that is rooted in the expertise of regional *by and for* Black, minoritised and migrant women’s ending VAWG organisations.

²¹ <https://southallblacksisters.org.uk/submissions-campaigns/investing-in-safety/>

- b. Funders such as Comic Relief choose to invest in frontline policy campaigners and researchers that are able to work in a victim-survivor-centric way and authentically represent regional and frontline concerns.

3. Further Investment in the Investing in Safety Model:

- a. Additional funding to further implement the use of the Investing in Safety model across regional and local communities, statutory and multi-sectoral networks.
- b. Future iterations of the Investing in Safety Model consider an expanded framework that include costings in relation to 'public safety' and preventative work undertaken with migrant children and young people.

4. Development of Specialist Health Outcomes and Indicators:

- a. Black, minoritised and migrant women led *by and for* organisations make a significant contribution to improving the physical and mental health of migrant women and children, but these are not fully captured and measured by the sector.
- b. The impact of NRPF conditions on the physical and mental health of future generations of children is a largely untapped area of research.

INTRODUCTION

*“NRPF makes you feel – as a human being it makes you feel stereo tight, segregated, emotionally unbalanced. When you think of your situation and where you come from and what you are going through right now, most of us should have been at a level higher than where you have come from but instead you are degraded because the system and some people make you feel what am I doing here? Isn't this supposed to be a safe place where human rights are practiced.”*²²

The *Changing the Narrative* evaluation charts the course, outcomes and impact of the No Recourse? No Safety! (NRNS from herein) project within the context of a vastly shifting socio-political landscape. The evaluation seeks to analyse and examine the outcomes of the innovative and creative frontline, campaigning and policy work of five specialist led *by and for* Black, minoritised and migrant ending Violence Against Women and Girls (VAWG) organisations (*by and for* from hereon) that delivered the NRNS Project between 2021 and 2024: Southall Black Sisters, Safety4Sisters, Latin American Women’s Rights Service, Ubuntu Women Shelter and the Angelou Centre.²³ A continuation of over two decades of collaborative work campaigning for the rights of migrant women, the partnership remains part of a national network and cohort of specialist *by and for* services. This cohort of grassroots organisations have taken an anti-racist, Black feminist stance in challenging legislation and policy that exacerbates discriminatory action and behaviours against Black, minoritised and migrant victim-survivors of violence and abuse.

Commencing in September 2021, the NRNS project was launched into a Covidian world in which lockdowns were still recurring and many specialist Black, minoritised and migrant women led services were left working as frontline responders in the absence of statutory services or any clear policy direction in relation to NRPF victim-survivors. As the Imkaan position paper titled *'The Impact of the Two Pandemics: VAWG and COVID-19 on Black and Minoritised Women and Girls'* reported:

“we are dealing with two pandemics – violence against women and girls declared by the World Health Organisation in 2013 and Coronavirus COVID-19. During the two pandemics, violence against women and girls is increased but for Black and minoritised women and girls, racialised discrimination and the disproportionate impact of structural inequalities also become exacerbated. No one is immune to coronavirus COVID-19, but structural inequality reproduces disproportionately across diverse communities and exacerbates existing

²² All quotes in purple are taken from evaluations, interviews and workshops with migrant victim-survivors.

²³ The Angelou Centre were involved in the NRNS Project for years 1 and 2 of the project only.

racialised inequalities. For any woman and girl with protected characteristics, the two pandemics increase her risks at multiple interlocking levels.”²⁴

The Comic Relief Change Maker’s programme came at a critical time for the specialist *by and for* sector which had already suffered multiple blows in relation to funding and resources worsened by over a decade of accelerated austerity measures.²⁵ Southall Black Sisters (SBS) led on the partnership bid for the Change Makers funding from Comic Relief and remained the lead partner throughout the project. Although there was a great deal of fluctuation in terms of staffing which initially disrupted the first year of activities, the project partners demonstrated immense resilience and fortitude during incredibly challenging times. The strength of the NRNS partnership to quickly adapt to unexpected change and sector stressors is reflective of the vigorous planning and adaptations that were put in place to address these changes.

Changing the Narrative reflects the value of the NRNS partners’ frontline work and includes victim-survivors’ and stakeholders’ evaluations of the project as well as evidenced case studies. The evidence threaded throughout the report comes from the NRNS partnership’s frontline service delivery and policy focused campaigning. It establishes a potential new model for all policy and research work that calls for specialist ending VAWG expertise. The project makes a grounded and well-argued case for systemic institutional, legislative and socio-political changes to shift a regional and national understanding of NRPF and the impact of this condition on Black, minoritised and migrant women and children victim-survivors of violence and abuse. It considers both the human and financial benefits of taking a rights-based approach to ending VAWG and investing in specialist *by and for* services. This involves a *change in the narrative* and recognition of the importance of specialist high-quality service provision delivered with the necessary expertise and systems modifications, policies and pathways.

The NRNS Project was a multi-faceted, complex and ambitious project, one that utilised frontline expertise to leverage a greater understanding of NRPF and the impact of this condition on women and children victim-survivors. The evaluation seeks to analyse this far-reaching project by examining in detail internal and external outcomes, data and impact. The evaluation will therefore explore, evidence, and evaluate the four main strands of the project, which revolve around:

1. **Qualifying the Evidence:** The production of reflective national NRPF data and the Black, minoritised and migrant women’s sector’s first cost-benefit analysis model – Investing in Safety

²⁴ <https://www.imkaan.org.uk/updates/2020/dualpandemics>

²⁵ <https://www.wbg.org.uk/publication/the-case-for-sustainable-funding-for-womens-centres/>

2. **Shifting the Narrative:** The amplification of the voice of NRPF victim-survivors through the centralised inclusion of Women's Voices and 'Storywork methodology' to inform campaigning, policy and models of change
3. **Strengthening Networks:** Diverse engagement with stakeholders and networks including local authority partnerships and commissioners
4. **Sustaining Solutions:** Building capacity and resources to activate policy change, embed knowledge networks and positively influence legislation and higher-level strategic decision-making locally, regionally, and nationally

Evaluation Approach and Aims

The approach of the *Changing the Narrative* evaluation is informed by frontline service's experiences of the many institutional and legal challenges that migrant victim-survivors experience. As specialist *by and for* organisations that are often working with a range of institutional challenges, there is a specific approach that must be taken in evaluating a project such as NRNS. This approach involves sensitivity and an acknowledgment that the partner organisations and staff have also experienced high levels of exclusion, racism and hostility whilst undertaking work with women with NRPF.²⁶ Additionally, the narratives of victim-survivors are recounted via first person testimonies and case studies to ensure that the voices of victim-survivors and the services that support them shape the report findings and recommendations. The *Changing the Narrative* evaluation aims to:

- Secure and anchor an understanding of both the NRNS project's achievements and its wider social, cultural and political impact.
- Accurately document the project outcomes; some of which may fall outside of the original project's aims and objectives.
- Incorporate the voices of the victim-survivors that have been involved in the NRNS project, using a narratological and intersectional framework that reflects the Black feminist ethos of both the project and the partners.
- Analyse project outputs and outcomes, including organisational development and learning.
- Identify key and distinct elements of the project that may not comfortably sit within a traditional evaluation framework.
- Note the full impact of the project, the partnership and their work on both regional and national stages.
- Consider any gaps, omissions or barriers in project delivery and outcomes.
- Make recommendations based on the evidence presented and the outcomes of the full term of the NRNS Project.

²⁶ To work with victim-survivors that are legislatively and societally excluded and who face a lack of appropriate or equitable responses to their needs adds another externally politicised and social-emotional set of challenges to this work, one that is often rooted in racism, classism and misogyny.

Evaluation Framework and Methodology

The evaluation examines the NRNS Project thematically across four chapters that give an overview of project outcomes through service delivery detail, data and case studies that evidence the wider scale achievements of this five-partner project. The four chapters, framed by an Introduction, Conclusion and Recommendations are based on a reading, contextual survey and analysis of three years of qualitative and quantitative data and oratorical evidence. This evidence has been further enhanced by interviews, evaluations and surveys provided by the NRNS partners, staff, victim-survivors, networks and stakeholders with a focus on the effective changes that this work instilled. By staggering the evaluation over a year of the project (from October 2023 – September 2024) and establishing an evaluation framework and methodology, the report has been able to capture processes that were integral to NRNS being a cohesive and impactful project. Use of an intersectional evaluation framework that reflected the project approach, allowed there to be a synthesis between the frontline needs of migrant victim-survivors and the direction of the project. It also enabled an equitable approach to evaluating the very different input of each organisation as they all differed in size, remit, income, service delivery and focus.

Working within a multi-modal and intersectional evaluation framework, the evaluation's narratological focus draws on a Black feminist analytical approach (holistic, intersectional, contextual) to best capture a diversity of voices, perspectives and understandings of the project.²⁷ The evaluation process included regular engagement with the NRNS partners, project consultants, stakeholders and victim-survivors via consultation and semi-structured interviews, workshops, online surveys and meetings with the partners. There was considerable time spent mapping the regional context of the project to further understand the impact of each phase of the project. The NRNS and partner evidence drawn upon included:

- A contextual research and literature review, surveying corresponding research and evaluations.
- Interviews and group workshops with a project lead from all five organisations over a period of twelve months.
 - Twelve in-person meetings (online and face to face), one-to-ones and interviews took place with the NRNS partnership including a one-day workshop to evaluate project findings and outcomes.
- Investing in Safety model source information and interviews with the model expert and consultant.
 - This included access to all the material and evidence used in the development as well as execution of the Investing in Safety model, such

²⁷ This approach is designed to address the “interlocking systems of privilege and oppression and to develop strategies that challenge those systems, with an emphasis on racism, sexism, hetero-sexism, and classism”. Crenshaw K. 1. Vol. 1989. *Univ Chic Leg Forum*; 1989. Demarginalizing the intersection of race and sex: a Black feminist critique of antidiscrimination doctrine, feminist theory and antiracist policies; pp. 139–167.

as minutes of meetings with the commissioners and stakeholders group, the thirty case studies used to pilot and test the model development as well as the recorded interviews and documentation.

- Bespoke national and regional activity and workplans, tools, resources, training presentations and plans developed for the project.
- Monitoring: both internal monitoring and monitoring shared with Comic Relief and the project outcomes database.
- Service-user demographics from across all five projects; these included global demographics as well as specific project data.
- Stakeholder and partner information in relation to service-users.
- Anonymised case studies and relevant work summaries.
- NRNS partners' social media, external facing policy, briefings reports and campaigning information in the public domain.
- An analysis of a selection of campaign material produced by the NRNS cohort over a two-decade period.

About the Partnership

“These organisations are operating at the pinnacle of By and For Service provision.”²⁸

The NRNS partners have established a broad network of partnerships with national and local community-based organisations across the migrant, human-rights, racial justice, VAWG, labour exploitation and human trafficking sectors. The NRNS partnership shares an Intersectional Advocacy model (See Appendix B) that includes specialist advocacy tools and all organisations either employ or are led by migrant women. As a partnership that reaches across four regions and two nations (North East, North West, Greater London and Scotland), they were able to address the different socio-economic issues and manifestations of racism that migrant women experience. These concerns are often overlooked by national policy-makers that do not fully recognise the depth of inequality faced by migrant women with NRPF living in post-industrial regions that have high levels of inter-generational poverty and health inequalities. Across these regions, socio-economic deprivation is disproportionately high due to both historical and contemporary economic disparities. A higher number of refugees and asylum seekers are ‘dispersed’ to the north of England and Scotland where there are five to ten times the amount of asylum seekers and three to five times

²⁸ Quotes come from in person interviews and surveys with NRNS partner stakeholders. These stakeholders include second-tier national membership organisations, frontline specialist services and regional statutory agencies from London, the North East, North West and Scotland. Quotes have been shared with permission. Stakeholder quotes are coloured blue to differentiate them from victim-survivors' quotes.

the number of resettled refugees in the UK than elsewhere.²⁹ This is often due to cheaper housing stock that attracts corporate initiatives, exempt accommodation and asylum/detention profiteering. The 2024 *Woman of the North* report also outlined that women in northern England provide the highest amount of unpaid care in the country, are more likely to be living in poor health or with mental ill-health, have the highest rate of domestic abuse experienced, are the poorest paid and the least likely to be economically or educationally active.³⁰

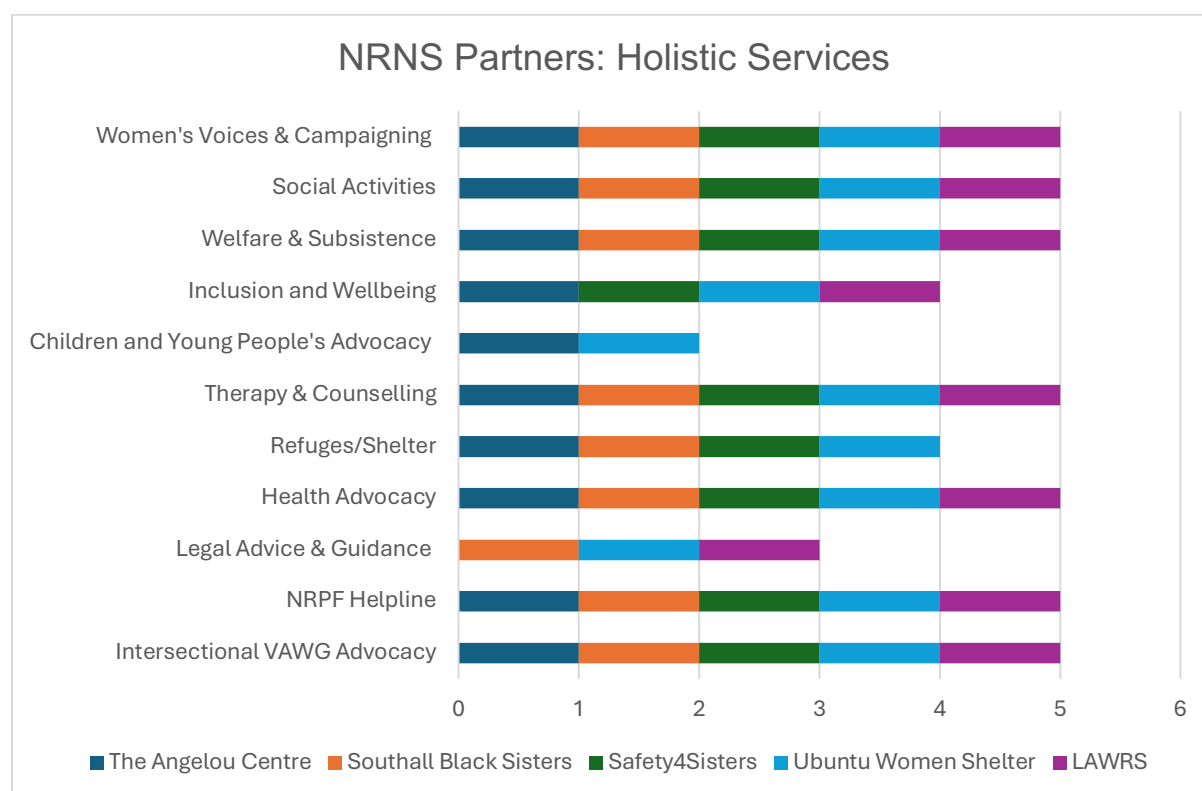


Figure 1: Range of services offered by the NRNS partners

Over 45 years, the lead NRNS project partner, SBS, has developed its ending VAWG expertise and delivered holistic services for Black, minoritised and migrant women. SBS and the consortium partners on the project, Safety4Sisters (S4S), Latin American Women's Rights Service (LAWRS), Ubuntu Women Shelter (Ubuntu) and the Angelou Centre have a combined 100-year track record of delivering frontline services for Black, minoritised and migrant women and children. An overview of each of their services follows:

²⁹ Taken from the *Woman of the North Report* (2024): Bambra C, Davies H, Munford L, Taylor-Robinson D, Pickett K et al. (2024) *Woman of the North*. Health Equity North: Northern Health Science Alliance.

³⁰ <https://www.pslhub.org/learn/patient-safety-in-health-and-care/womens-health/woman-of-the-north-inequality-health-and-work-3-september-2024-r12024/>

Southall Black Sisters (SBS)

SBS is a leading, multi award-winning *by and for* organization that was founded in 1979. Their work is directed at assisting women and children who are victim-survivors of domestic and other forms of gender-based violence and harmful practices to obtain effective protection and assert their fundamental human rights. SBS runs a specialist holistic resource centre and they deal with over 7,000 cases and enquiries a year. They provide a national helpline, information, advice and advocacy, counselling, safe accommodation routes and other support services. The organisation also undertakes campaigning, policy, educational, training, evaluation and action research work. SBS receive referrals from, and work in partnership with, a range of agencies from the statutory voluntary and private sectors. Over 60% of their service-users are subjected to NRPF conditions.

SBS is renowned for their expertise on domestic and sexual violence, harmful practices, immigration and NRPF in migrant and Black, minoritised and migrant communities. Their work has led to the introduction of legal and policy changes on these issues and influenced best practice via professional guidance and training as well as educational and prevention work with Black, minoritised and migrant communities. In relation to migration, SBS was instrumental in introducing the Domestic Violence Indefinite Leave to Remain (DVILR) and the Destitution Domestic Violence Concessions (DDVC, now renamed as the Migrant Violence Domestic Abuse Concession – ‘MVDAC’). SBS continues to lead on campaigning to extend these reforms to all migrant victim-survivors regardless of their immigration status.

Ubuntu Women Shelter (Ubuntu)

Based in Glasgow, and working across south Scotland, Ubuntu is a migrant led Black, minoritised and migrant ending VAWG organisation that predominantly work with women with NRPF. It is the smallest organisation of the five NRNS partners, with a staff team of 5 and a range of volunteers. Ubuntu work with women who have experienced VAWG that is compounded by institutionalised state abuse and the hostile environment. Ubuntu’s shelter/refuge supports up to 60 women with NRPF a year and Ubuntu supports over 120 intensive cases, as well as providing outreach and community-based support and subsistence to over 600 women and 150 children a year. During the course of the NRNS project, their reach has doubled.

Led by a diverse team of migrant women and volunteers, Ubuntu offer a significant range of crisis and recovery services and operate both a shelter (refuge) and a community-based drop-in centre. The legislative context that migrant women experience in Scotland spurred on Ubuntu to buy their own shelter for women with NRPF using community crowd-funding alone. This set the foundations for an organisation that is independent of state funding, and radical in its approach. Ubuntu’s services actively work toward ‘repealing the hostile environment’ at all levels and

include somatic and therapeutic recovery, wellbeing and subsistence support for women with NRPF.

Latin American Women's Service (LAWRS)

With a profound understanding of the multifaceted nature of abuse and exploitation faced by migrant women, LAWRS has been providing specialist ending VAWG services for 40 years. LAWRS works with over 1,400 Latin American women each year, over 30% of these women have NRPF. LAWRS' frontline work enables the organisation to directly influence legislation and provide credible practice-based evidence to influence policy at local and national levels. LAWRS' analysis of VAWG emphasises that human rights violations are inherently related to the multiple inequalities facing migrant women. LAWRS' extensive work has evidenced the critical links between various forms of abuse, criminal exploitation, and trafficking, as well as the systemic failures in statutory responses.

Through partnerships and collaborations, LAWRS uses their unique rights-based expertise to ensure migrant voices are central in research, policy and strategic advocacy efforts. Examples of LAWRS' recent campaigns include the Step-Up Migrant Women campaign in which all members of the NRNS partnership participated. This project garnered the support of over 50 organisations from across the women's, migrant, labour, and human rights sectors.³¹ LAWRS has also been leading on campaigns to introduce a firewall to prevent data-sharing between police and statutory services such as Immigration Enforcement to encourage migrant victim-survivors to report abuse and seek help.

Safety4Sisters (S4S)

S4S was established in Manchester in 2009 to address the exclusion of migrant women (particularly those with NRPF) from safety and protection. The organisation challenges strategies and practices that exclude migrant women from protection within statutory and voluntary provision by educating and challenging organisations and the public to uphold the human rights of migrant women. They also challenge the exclusion of migrant women through the creation of spaces for sisterhood in which the individual stories of migrant women are transformed into collective stories and collective action. Despite the continued pressure on the organisation's services, S4S has continued to deliver a specialist and holistic package of support to Black, minoritised and migrant women, working to meet both their crisis and longer-term recovery needs. This has included providing emergency financial assistance, sourcing and providing emergency accommodation and crisis advocacy. In addition, S4S has worked to meet the emotional needs of migrant women through intensive therapeutic

³¹ <https://stepupmigrantwomen.org/>

interventions, including trauma informed support, specialist counselling, group work and social activities and networks.

S4S is a feminist and anti-racist organisation with a vision for a world in which all migrant women are safe and live lives free from patriarchal and state injustice. S4S seek to promote, preserve and protect the safety, human rights, and mental health of migrant women with NRPF who have experience of gender-based violence, and to advance the education of organisations and the public about issues relating to violence against women and girls, racism, and migration.

The Angelou Centre

The Angelou Centre is a Black, minoritised and migrant led *by and for* community-based organisation with three decades experience of centring and supporting the needs of Black, minoritised and migrant women and children. The Angelou Centre provides a range of holistic VAWG services that include advocacy services, children, parenting and young women specific services, accredited training, social networks, as well as specialist multi-lingual therapeutic services and both crisis and move-on refuge accommodation. All service delivery is inclusive of, and developed to meet the needs of, women with NRPF and/or uncertain immigration status. Although based in Newcastle in the North East of England the organisation works regionally (across Tyne and Wear, Northumberland, Durham and Tees Valley) and nationally due to its refuge provision.

PART 1: MAPPING THE PROJECT DEVELOPMENT

“The government need to listen to women, understand that we have the rights.”

The absence of robust policy and protocols that relate to the ‘interlocking’ issues of institutional racism, Violence Against Women and Girls (VAWG) and NRPF has undoubtedly led to the escalation of violence and abuse for migrant women and children. It has also led to a deeply entrenched fear of reporting any abuse or violence to statutory services.³² These matters have been outlined in previous campaigns by SBS, LAWRS and other NRNS partners, with these respective campaigns demonstrating the inequalities that migrant women experience within a broader sex equalities framework.³³ For example, February 2024 saw the launch of the Labour Party’s proposed Race Equality Act which would seek to protect Black, minoritised and migrant people with a focus on women’s pay and workplace equality.^{34 35} However, there has so far been little substantive information about how this will be realised and no constructive policy initiatives appear to have been developed in relation to migrant victim-survivors or women with NRPF, despite references in the proposal to ‘migrant women’ and ‘migrant communities’. Again, race, VAWG and immigration are seen to be distinct and separate. The political elephant in the room is always purported to be a lack of funding, but as this evaluation concludes it more often a lack of will that informs the diminishment of migrant women’s human rights and the legislative omissions which the NRNS project addresses head on. Unfortunately, public policy-makers have not been so eager to keep pace with the substantive needs of migrant women in the UK, particularly those with NRPF, who are being violated and abused.³⁶

Many existing domestic abuse victim-survivor-orientated mechanisms and pathways can be harmful to Black, minoritised and migrant women and children victim-survivors, particularly those who experience immigration enforcement and destitution. Discriminatory practice can lead to largely inconsistent statutory responses to migrant women with NRPF.³⁷ This failure to co-ordinate effective local responses has left the specialist VAWG sector taking on statutory responsibilities without the correlative

³² <https://www.kcl.ac.uk/news/new-study-finds-migrant-women-experience-high-levels-of-violence-but-are-often-too-afraid-to-report-it>

³³ See various campaigns on SBS and LAWRS websites, and on:

<https://stepupmigrantwomen.org/>

<https://southallblacksisters.org.uk/submissions-campaigns/reform-no-recourse-to-public-funds-campaign/>

³⁴ <https://southallblacksisters.org.uk/submissions-campaigns/reform-no-recourse-to-public-funds-campaign/>

³⁵ <https://www.fawcettsociety.org.uk/news/fawcett-welcomes-labours-proposals-for-a-race-equality-act>

³⁶ <https://domesticabusecommissioner.uk/migrant-victims-forced-to-stay-with-abusers-or-face-destitution-because-they-cant-access-public-funds/>

³⁷ For the purposes of the report ‘mechanisms’ and pathways refers to a broad reaching set of implementation tools or actions pertaining to policy, strategies and protocols, these are usually process driven and contextual

funding.³⁸ This is particularly concerning when we consider that the five NRNS partners' total combined income is less than *one* generic London domestic abuse organisation of a similar size to SBS.³⁹ The *by and for* sector has seen a vast depletion of funding and resources over the past decade and appears to be operating in a hostile environment which not only leaves the victim-survivors they support more vulnerable, but also the organisations.⁴⁰

As described, the NRNS Project concept was developed in the midst of the Covid-19 pandemic and the funding was allocated by Comic Relief just as the national recovery was commencing. For a brief amount of time, in the first six months of the pandemic (March 2020-September 2020), ending VAWG funding was boosted and local authorities included migrant people with NRPF in their homelessness and domestic abuse strategies. As a result, in this brief period of time, members of the NRNS partnership were able to apply for this funding and include women with NRPF in their funding applications.⁴¹ Despite the prevailing increase in cases of destitution and homelessness due to NRPF, this temporary measure has now largely ended and women and children continue to be subject to a cycle of destitution, homelessness, fear and isolation. The Angelou Centre reported that victim-survivors are now subject to "repeat perpetration and a 'revolving-door' crisis response from first response public sector agencies".^{42 43} When multi-sectoral organisations do not meaningfully engage with or work in partnership with specialist *by and for* services there are often significant equalities and human rights breaches, and failures to protect victim-survivors.⁴⁴ A lack of investment in specialist services (or inclusion at a strategic level) then paves the way for poorly informed protocols and practices. This is further aggravated when

³⁸ As reported, between 42% (LAWRS) and 100% (S4S) of the women that the NRNS partners supported were women and children with NRPF. The national trend of specialist *by and for* organisations outside of London according to research undertaken by the Angelou Centre is consistently between 60 and 70%.

³⁹ This reflects the joint EAW and Imkaan Briefing of key stats from 2020:

<https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/Joint-Briefing-for-Meg-Hillier-MP-Debate-EAW-Imkaan.pdf>

"25 Black and minoritised women and girls' services shared an annual income of £10 million in 2017 (averaging £400,000 per organisation). 10 non BME specialist women's services shared an income of £25 million (averaging £2.5 million per organisation)"

⁴⁰<https://rosauk.org/wp-content/uploads/2023/04/Women-and-Girls-Sector-Research-Mapping-Report-Amended.pdf>

<https://www.theguardian.com/uk-news/2023/feb/09/uks-hostile-environment-policies-disproportionately-impact-people-of-colour>

⁴¹ For example, the Ministry of Housing, Communities and Local Government (MHCLG) temporarily boosted funding support for the homeless including £10 million that was specifically directed toward specialist refuge accommodation. <https://www.gov.uk/government/publications/domestic-abuse-safe-accommodation-covid-19-emergency-support-fund>

⁴² Although the Angelou Centre were only able to support year the first 18 months of the project, their contribution to the project development was substantial. Quotes throughout are taken from discussions about their involvement and work on NRPF over the past 15 years.

⁴³ This factor also led the NRNS partnership to centre the development and implementation of a social-value model for the *by and for* sector.

intersecting forms of violence and abuse are perpetuated or further institutionalised by statutory and public sector systems and structures.

“Where there is a statutory pattern of poor practice and responses to migrant women, particularly those with NRPF, there appears to be a correlative lack of equitable policy and decision making and a failure to engage, include, commission and resource specialist Black and minoritised VAWG services.”⁴⁵

This results in the most marginalised victim-survivors falling through policy and procedural gaps, especially where they are underpinned by inequitable or exclusionary legislation and law. This leads to the increasing need for specialist services to refer to and rely on international obligations in lieu of domestic law and policy.⁴⁶

Addressing Violence Against Black, Minoritised and Migrant Women

The violence experienced by women and children with NRPF often intersects with and includes forms of harm related to human trafficking and modern-day slavery (MDS). Perpetrators will use migrant victim-survivors’ fear of authority to manipulate abuse and coerce them further. Women and children with NRPF who fall through what can be seen as an institutional gap between domestic abuse and MDS policies and legislation can be put at further risk or discriminated against by agencies that do not have specialist knowledge of the harm that NRPF conditions create. Non-specialist agencies also often lack the expertise to provide appropriate remedies that are trauma-informed and centre victim-survivors’ rights. Such inappropriate remedies include the misuse of the National Referral Mechanism (NRM) where there has been domestic abuse and harmful practices, or the enforced use of the asylum route by local authorities that wish to avoid adhering to Section 17 of the Children Act.^{47 48} Victim-survivors with NRPF or those that have insecure immigration status experience further risks due to what can be determined to be abuse and vulnerabilities that are specifically due to their immigration status.⁴⁹ Victim-survivors of abuse that have insecure immigration status also face disproportionately higher levels of risk in relation

⁴⁵ Taken from the Angelou Centre’s *Hinterland of Marginality* research which informed the Domestic Abuse Commissioner’s 2021 report *Safety Before Status*, (internal document only).

⁴⁶ More specifically, the [Convention on the Elimination of all forms of Discrimination of Women, Istanbul Convention](#) and the [International Convention on the Elimination of all forms of Racism](#).

⁴⁷ The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support.

Modern slavery is a complex crime and may involve multiple forms of exploitation. It encompasses:

- human trafficking
- slavery, servitude, and forced or compulsory labour

⁴⁸ <https://www.nrpfnetwork.org.uk/information-and-resources/rights-and-entitlements/support-options-for-people-with-nrpf/social-services-support-for-families/when-will-a-family-be-eligible>

⁴⁹ <https://domesticabusecommissioner.uk/wp-content/uploads/2021/10/Safety-Before-Status-Report-2021.pdf>. Also see SBS briefing: <https://southallblacksisters.org.uk/app/uploads/2023/05/da-bill-briefing-paper-2.pdf>

to sexual and labour exploitation, homelessness, and destitution. This creates a maelstrom of issues that complicate the case of a victim-survivor with NRPF and yet her immigration status will often exclude her from the expected level of multi-agency safeguarding attention. As a result, migrant victim-survivors' abuse can be institutionalised by agencies lacking the knowledge or the local pathways to support women with NRPF, putting migrant women at further risk of abuse, exploitation and criminalisation.

Navigating the Hostile Environment: Campaigning & Policy Work

“NRPF is a mechanism that is treating people differently and there is no real reason why people were treated differently apart from race because when the Ukrainians came here they immediately got access to public funds. So to my understanding that’s how the system is set up to make you feel as a Black woman.”

Inadequate and discriminatory responses from agencies, non-specialist domestic abuse services and generic charities can leave migrant women fearful of seeking support and unable to trust services that are meant to safeguard and protect victim-survivors of abuse and exploitation. In interviews, consultations and evaluations with victim-survivors (which formed both part of the NRNS Project and the evaluation) women shared harrowing experiences that informed the direction of the Investing in Safety model and the campaigning and policy focus of the project. Women cited their grave fear of further violence, exploitation, destitution, incarceration and deportation, and many mothers discussed their negative experiences of having their children removed from their care due to their NRPF status through either child proceedings or the family court.

At the heart of the NRNS Project and Theory of Change (Appendix A) is their ongoing campaign – led by LAWRS – for safe reporting pathways for migrant women, otherwise known as a firewall, rejected by the Home Office despite extensive grassroots campaigning in 2021.⁵⁰ SBS and Liberty filed the first ever police super-complaint in relation to the police sharing victim-survivors' data and information with the Home Office. As the super-complaint cites, the Home Office are not a 'safeguarding' body and immigration enforcement should not be a prioritised measure when women and children are at risk of abuse and violence.⁵¹ Although the Home Office conducted a review of the legal framework and policy and engaged VAWG services in a series of round-tables to develop a firewall, the firewall was not introduced. Instead, the Immigration Enforcement Migrant Victims Protocol, which allowed for the sharing of data, was created by the Home Office, but this too was not

⁵⁰ <https://www.endviolenceagainstwomen.org.uk/home-office-rejects-recommendation-to-introduce-a-firewall-to-protect-migrant-survivors/>

⁵¹ <https://www.libertyhumanrights.org.uk/issue/liberty-and-southall-Black-sisters-super-complaint-on-data-sharing-between-the-police-and-home-office-regarding-victims-and-witnesses-to-crime/>

introduced due to objections. LAWRS and SBS, supported by women's organisations advocating for the rights of migrant women (which included other members of the NRNS partnership) opposed the protocol as the evidence they have gathered determined that it would put migrant victim-survivors at greater risk compounding the levels of discrimination and violence that they experience. Unfortunately, in lieu of a firewall, the police continue to make inappropriate referrals to Immigration Enforcement that put victim-survivors' lives at risk.⁵² As the Domestic Abuse Commissioner (DAC)'s report *Safety Before Status* outlines:

“Perpetrators of domestic abuse often use a victim’s insecure immigration status to exert further power and control. This form of coercive and controlling behaviour is defined in this report as immigration abuse. Immigration abuse is a form of abuse that is compounded by immigration legislation, policy, and practice. Identifying and naming immigration abuse is vital in ensuring that national and local policy makers and frontline practitioners are equipped to identify and respond appropriately to victims and survivors.”⁵³

The NRNS partners' decades of campaigning to challenge legislation and policy that breaches the rights of migrant women and children alongside their policy-making experience has bolstered the project as a whole. Having a finely honed policy skill-set embedded in the partnership has given the organisations the reputation and credibility to influence decision-makers, foment innovative policy-making and secure local pathways for migrant women with statutory agencies. For example, LAWRS have developed policy and strategic advocacy in-roads in areas such as the Victims and Prisoner's Bill (following years of consultation) to raise awareness of the serious harm and consequences that a lack of a firewall can have on migrant women and children. SBS have led on discussions with the Home Office to improve policies and procedures in relation to the extension of the MVDAC, to affect longer-term change in relation to NRPF conditions. The Angelou Centre and Ubuntu have promoted victim-survivor voice via governmental consultations and inquiries to expose the full impact of poor statutory service responses on the safety and protection of migrant women at risk of severe violence and domestic homicide. S4S (and other partners) have influenced and improved local referral pathways and statutory knowledge of migrant women and children (via the training component of the project) which has directly influenced statutory agency policies and procedures around migrant women and children.

Support for Migrant Victims Pilot

There are many challenges faced by organisations that provide specialist NRPF accommodation due to the lack of public funds. It often leaves organisations having to

⁵² After the General Election in July 2024, LAWRS and SBS have been discussing the firewall proposal again with the new government.

⁵³ <https://domesticabusecommissioner.uk/wp-content/uploads/2021/10/Safety-Before-Status-Report-2021.pdf>

provide safe accommodation, subsistence and wrap-around crisis support to victim-survivors with no state funding; effectively organisations that provide specialist NRPF safe accommodation are subsidising the state and providing services that are seen to be 'free' but come at a cost to the *by and for* organisations who have to rely on reserves, voluntary staff expertise and small pots of crowd-funding or charitable funding to address state failings.

Following the exclusion of migrant women with NRPF from the Domestic Abuse Act, and subsequent nationwide campaigning from specialist *by and for* services led by SBS, the government committed to a safe accommodation 'pilot' for migrant victim-survivors with NRPF and SBS won the tender to deliver the pilot with a number of partner organisations. Initially the Home Office offered one year of funding, which was then initially extended for one year, and later for another two years.⁵⁴ The aim of the pilot, called the Support for Migrant Victims (SMV) scheme was to ascertain and evaluate the extent of the 'issue' and to build an 'evidence base' around the needs of migrant victim-survivors with NRPF. In 2023 the Centre for Woman Abuse Studies Unit (CWASU) at London Metropolitan University published their independent evaluation of the SMV scheme titled '*Living at the Edge*'.⁵⁵ This evaluation, commissioned by SBS, documented the experiences and support needs of migrant victim-survivors of domestic abuse, particularly foregrounding the women's voices. The report summarised in detail the structural inequalities, barriers and challenges experienced by the victim-survivors who were accessing lifesaving accommodation within a legislative and strategic policy that excluded their needs and rights. As the report states:

*"Immigration controls and the NRPF rule thus exacerbated the power and control that abusers and their families are able to exercise, severely restricting women's space for action. While many were able to identify ways that the SMV pilot, and especially the support from the partner organisations, had expanded their space for action, very few were able to feel safe or free in the shadow of insecure immigration status and unresolved immigration applications."*⁵⁶

Prior to the SMV pilot, SBS had led on a consortium in partnership with the Angelou Centre and S4S the aims of which were to provide housing, subsistence and refuge support costs to women (and their children) victim-survivors with NRPF. This project also showed the need for reform on NRPF. The evaluation of yet another SBS pilot

⁵⁴ Since the General Election in July 2024, SBS has been discussing with the new government the need to extend the SMV scheme and introduce reforms on NRPF policy.

⁵⁵ <https://southallblacksisters.org.uk/app/uploads/2023/08/final-cwasu-evaluation-of-the-support-for-migrant-victims-programme-12th-june-2023.pdf>)

⁵⁶ Much of what was said about the needs of migrant victim-survivors and the need to address the problems of NRPF were also reflected in the Home Office commissioned evaluation of the SMV pilot. See <https://www.gov.uk/government/publications/evaluating-the-support-for-migrant-victims-smv-pilot/evaluating-the-support-for-migrant-victims-smv-pilot-findings-from-a-process-evaluation>

was conducted by Professor Ravi Thiara and titled *Safe and Secure*. In the report, she concluded:

“That women with insecure immigration status who have NRPF are subjected to some of the most extreme forms of violence but have constricted options. They experience chronic mental ill-health and once they pluck up the courage to leave, often in desperation, they are further re-traumatised by the immigration system which blocks or delays avenues to help, leaving women without safety, security and protection.”⁵⁷

Developing the Investing in Safety Model

“This [the Investing in Safety Model] is long overdue, the need for an economic evaluation of led by and for services, and all that they contribute not only to women’s safety and the sector, but also to statutory services. Legislation, neglect and discrimination have resulted in migrant women being forced to stay in abusive situations. No one could have done this better than led by and for organisations, but the fact that they had to fight to get funding for this project says a lot about the government’s abandonment of migrant women and survivors.”⁵⁸

The Investing in Safety model was a central part of the NRNS project and resulted in the production of a robust and innovative cost-benefit calculator to show the significant savings to the state generated by rights-based pathways and access to specialist *by and for* services. The Investing in Safety model evidences “that local public services generate net savings when they invest in ending gendered violence against migrant women with NRPF.”^{59 60 61} Alongside the cost-benefit calculator and a detailed analysis report, an accompanying detailed report and ‘how to use’ video was created and the model was publicly launched in April 2024, with over 190 professionals from multi-sectoral agencies attending the online event, now available for public viewing on the

⁵⁷ Thiara, R. (2019) *Safe and Secure: The No Recourse Fund*. Southall: Southall Black Sisters: <https://southallblacksisters.org.uk/app/uploads/2023/01/safe-secure-report.pdf>

⁵⁸ Quotes in blue are taken from interviews and workshops with the NRNS Project partners and stakeholders.

⁵⁹ <https://southallblacksisters.org.uk/app/uploads/2024/04/investing-in-safety-report-final.pdf>

⁶⁰ The Migration Observatory at the University of Oxford has recently estimated the numbers of people in the UK with NRPF to be 2.58 million, in 2020 an estimated 1.48 million people showing a significant increase that deserves more national attention. “At the end of 2022, the top nationalities in visa categories with NRPF were India (665,000), China (316,000), Nigeria (268,000), Pakistan (147,000) and Hong Kong (121,000)” Almost 1 million of people with NRPF were on student visas (987,000). <https://migrationobservatory.ox.ac.uk/wp-content/uploads/2023/11/MigObs-Briefing-Deprivation-and-the-no-recourse-to-public-funds-NRPF-condition.pdf>.

⁶¹ Research published by DAC estimates there are 32,000 victim-survivors of domestic abuse with NRPF, with about 7,000 needing refuge accommodation per year. Legal reform on NRPF can save about £2 billion over 10 years. See <https://domesticabusecommissioner.uk/wp-content/uploads/2022/12/Safety-before-status-The-Solutions.pdf>

SBS website and YouTube.⁶² Notably, all the resources in the model, including the cost-benefit calculator are free to download and use.

Drilling down net savings of over £18,000 per victim-survivor, the cost-benefit calculator enables specialist *by and for* services that provide accompanying *by and for* interventions for Black, minoritised and migrant victim-survivors to demonstrate the socio-economic value of their services. Most usefully, the net savings are divided into specific areas of intervention on the calculator allowing small and large-scale financial modelling where needed. The model can provide detailed financial information and savings across health, housing and homelessness, policing, children's services, Multi Agency Risk Assessment Conferences (MARAC) and additional public services. By expertly differentiating the costs, the Investing in Safety model is able to 'speak' to not only the agencies but the commissioners and funders at local, regional and national levels, and make an austerity-proof case of investing in *by and for* services.⁶³

Importantly, the Investing in Safety model was developed, designed and contextualised by the work of the NRNS partners led by SBS and victim-survivors' case studies to promote the human and financial cost of NRPF. Drawing on evidence from the 1,000 plus women with NRPF who access the NRNS partners' frontline services every year, the Investing in Safety model piloted (whilst in production) thirty detailed case studies against which to test the model whilst it was being developed. The development of the Investing in Safety model resources also incorporated an in-depth literature review and was scaled against peer-reviewed research into public health, social care, policy and local authority economic modelling and costings. There are few robust economic modelling systems of this calibre that include this level of calculational transparency making this very advanced in approach when compared to other economic models in the ending VAWG sector. The Investing in Safety model is not only fit for purpose but is well-researched and evidenced, the accompanying report provides a detailed framework and rationale for the model.⁶⁴ Although, this was just one aspect of the NRNS project, it proved to be of great value. As recommended, this model should be further promoted, invested in and given wider recognition by funders.

*"When scaled up to a **cohort of 40 women, £720,945 net savings** are generated over three years (figure 1); if **applied nationally, net savings become an estimated £127,012,499.**"*⁶⁵

The *Investing in Safety* report, authored by Fiona Sheil, articulates a strong rationale around the immense savings to be made by local authorities by investing in specialist safe accommodation support and refuges for women and children with NRPF. NRNS

⁶² <https://www.youtube.com/watch?v=bTZFaW5xiXA>

⁶³ <https://southallblacksisters.org.uk/submissions-campaigns/investing-in-safety/>

⁶⁴ For sector comparisons, and to evidence the robustness of the Investing in Safety Model, one could consider and evaluate the recent Women's Aid recent 2024 report *The Price of Safety*: <https://www.womensaid.org.uk/the-price-of-safety/>

⁶⁵ <https://southallBlacksisters.org.uk/app/uploads/2024/04/investing-in-safety-report-final.pdf>

partners such as S4S, the Angelou Centre and Ubuntu provide a range of specialist safe accommodation for women and children with NRPF in the North East and Scotland which includes holistic wrap-around services and subsistence support, according to the Investing in Safety model, the net savings they provide accrue into the hundreds of thousands over three years.

An area that the Investing in Safety model could consider in future iterations are the savings (social and financial) specialist interventions have made in terms of community and public safety, as well as children's future health and well-being outcomes.

Training

Training was a key part of the NRNS project, it focused on building the capacity and skills of professionals and multi-sectoral agencies to respond to the needs of victim-survivors with NRPF through a rights-based lens. The NRNS training packages were developed by S4S and as the project developed training was expanded to include multi-sectoral and community sector audiences. All partners additionally delivered training in their local areas and regions:

- Ubuntu: Led on community engagement across the South of Scotland, with a focus on migrant women's rights as well as community organisations which included arts, migrant groups and activist groups.
- SBS: Delivered high-level statutory training with a focus on local authorities, commissioners and non-specialist domestic abuse sector and second-tier organisations.
- LAWRS: Extended their training reach to women who were experiencing high levels of labour exploitation in addition to VAWG, through their partnerships with the Labour Exploitation Advisory Group (LEAG).
- The Angelou Centre: In year 1 and 2 focused on multi-agency stakeholder training with safeguarding leads and professionals across Northumbria.

The following example outlines an overview of the S4S 'Professionals Training' content and outcomes that give an insight into the unique and informed approach of the NRNS partnership's training delivery:

Training Title	Content	Outcomes
<i>Module 1: Migrant Women with NRPF: Immigration Abuse and NRPF</i>	<ol style="list-style-type: none"> 1. No Recourse to Public Funds Condition 2. MVDAC 3. Asylum & Detention 4. Legislative & Systemic Context: Hostile Environment 	<ul style="list-style-type: none"> ○ Understanding the NRPF Condition ○ Definition & Legislation ○ Benefits that are Public Funds ○ Benefits that are not Public Funds

	5. Immigration Abuse: Definition & Impact 6. Professional Practice Guidance <ul style="list-style-type: none"> • Q&A 	<ul style="list-style-type: none"> ○ What does NRPF mean in Practice? ○ Understanding Power: Victim-Survivors' Lived Experience ○ Improved engagement with Victim-Survivors
<i>Module 2: Supporting Black, Minoritised & Migrant Women Fleeing Gender-Based Violence</i>	1. Harmful Practices: Definition & Legislation <ol style="list-style-type: none"> a) HBV b) FM c) FGM d) Immigration Abuse e) Domestic Slavery 2. Statutory Responses 3. Specialist Responses 4. Migrant Women's Pathways <ul style="list-style-type: none"> • Q&A 	<ul style="list-style-type: none"> • Understanding Violence Against Migrant Women and Girls • Improving 'Cultural Competency' • Barriers to Support: Multiple & Silent • How to Support Migrant Women's Pathways • Improving Practice & Good Practice Procedures
<i>Module 3: Safeguarding Marginalised Migrant Victim-Survivors & Communities</i>	1. Investing in Safety Model: Equality, Justice & Safety 2. The Role of Safeguarding 3. Why Reimagine Safety Beyond Safeguarding? 4. Case Study: Stella's Story & Voice <ul style="list-style-type: none"> • Q & A 	Improving Practice & Good Practice Procedures: <ul style="list-style-type: none"> • Improving Practice & Good Practice Procedures • Best Practice: Victim-Survivor Centred, Empowering Approach • Best Practice: Communication • Best Practice: Migrant Victim-Survivors

Figure 2: Professionals Training Content Table

The partnership exceeded their training outputs particularly community-based training, which fell within the remit of the project engagement with victim-survivors. This resulted in boosting the number of migrant victim-survivors that the project engaged with in the final year of the project, it also saw Ubuntu (who led on community engagement training) reaching over 600 migrant women within year 3 of the project through their consolidated training sessions and awareness drop-ins. These should be differentiated from other professionals training which were stand-alone training sessions. Ubuntu engaged with migrant women who accessed their training in a trauma-informed and considered way, with women who were victim-survivors being given additional support through their extended services (somatic healing activities as well as group and individual therapy). Likewise, LAWRS was able to provide additional support to women who engaged with their training through partners and needed advice and guidance through their specialist in-house legal project.

Feedback

Feedback and evaluations from the training sessions that S4S delivered to over 400 professionals across the course of 2 years were consistently positive, although there was an inconsistent level of engagement from agencies in the post training evaluations. To ensure that the project captured feedback (with post course evaluation return rates being generally, notoriously low) the training feedback was captured, when delivered online, in the chat, as well as on feedback forms. Feedback for training that was delivered in-person (where possible agencies were given a choice of online or face-to-face training) was captured on flipcharts as well as on evaluation forms. All attendees were given evaluations to complete and return, approximately 30% of those that attended training completed an evaluation form, but over 60% provided feedback either during or after the online and face-to-face trainings sessions. Training evaluation forms followed a simple and accessible formula, that was agreed by the partnership and included a scaling question regarding improvement of knowledge between a range of 0-8, as well as three open questions that varied according to the content of the training as well as an open comments box. Based on the documented feedback from completed evaluations:

- 80% of those trained felt that their knowledge of the subject matter had improved by at least 4+ points on the scale provided, with over 40% scaling at 5+.
- The evaluations consistently captured attendees quoting specific areas of knowledge and awareness that they considered to be critical to their professional role.
- Over 50% of evaluations discussed having an increased understanding of the impact of NRPF on migrant women's safety, which they didn't have before.
- 40% of evaluation respondents commented on pragmatic steps they would be taking to improve their working practice or agency practice such as ensuring that migrant women's rights were considered, and women were being referred to specialist *by and for* services.

Other feedback to be noted included attendee comments that gave a significant insight into the quality and impact of the training:

"The trainer knew a lot of about the subject matter but also about the way that our service works...this means that I can integrate the training into my professional environment."

"It was important for this training to include a detailed idea of law and policy, we don't get that information from the local authority."

"Before training I didn't understand the ways that women can be abused because of no recourse and I thought they automatically got a refuge place."

“I feel I can take this training back to where I work and train the people I work with...we need to improve our practice.”

“Thanks for providing such in depth information, I thought the style, pace and content was perfect for me and will help me enormously in my role.”

Developing Migrant Women’s Safe Pathways

One of key strategies of the NRNS partnership to preserve the rights and safety of victim-survivors, apart from ending the NRPF rule and conditions, is to put in place a firewall which was led on by LAWRS. As this has not yet been achieved through legislation, the partnership has implemented creative ways to embed ‘safe pathways’ either at local multi-agency levels through a series of policy recommendations and guides, as well as through wide-scale professional training and an awareness-raising campaign to improve community and public sector responses.⁶⁶ LAWRS has also influenced the London Mayor’s Office for Policing and Crime (MOPAC), which have shared their disappointment that the practice of immigration data-sharing by the police with the Home Office continues and in March 2023, Freedom of Information (FOI) data stated that the Metropolitan Police made a total of 460 referrals to Immigration Enforcement between May 2020 and September 2022. The Victims and Prisoners Act also took a disappointing turn by not including any reference to migrant victim-survivors after years of protracted reviews and consultation. As reported by LAWRS in June 2024:

“This legislation represents another law that has passed which excludes migrant victims from access to justice. At the final stages of the Bill, an amendment to introduce an information sharing firewall between statutory services and immigration control introduced in the House of Lords, fell at the last hurdle. This lack of protection will continue forcing migrant victims of crime to endure abuse and exploitation with no hope of holding perpetrators accountable.” - Step Up Migrant Women ⁶⁷

Both the Angelou Centre and S4S have worked on the development and implementation of the Safe Migrant Pathways across Northumbria and Greater Manchester policing areas in lieu of a firewall being passed as part of the Victims and Prisoners Act.⁶⁸ During interviews, project leads from the NRNS partnership discussed the positive development of this work:

⁶⁶ The Safe Pathways toolkit, implementation and training has been led on by the Angelou Centre and S4S

⁶⁷ <https://stepupmigrantwomen.org/2024/06/05/the-victims-and-prisoners-act-is-yet-another-law-that-fails-to-protect-migrant-victims/>

⁶⁸ ⁶⁸ https://northumbria-pcc.gov.uk/v3/wp-content/uploads/2023/10/Multi-agency-Guidance_Migrant-survivors-with-NRPF_Final_2023.pdf

“Since I have started working in Manchester, the Greater Manchester Combined Authority have now made clear that they are committed to improving justice outcomes for migrant survivors by ensuring safe reporting practice. They have agreed for me to develop the same guidance, which will be implemented across the 10 Greater Manchester Councils, alongside regular scrutiny of how closely the guidance is being followed by the police and the wider impact of it.”

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Another member of the partnership commented:

“I hope that this encourages other PCC’s and councils to meaningfully consult with local specialist services to see how they can foster safe reporting locally, even if there is a block nationally because all survivors, regardless of their status, have the right to engage with the criminal justice system without fear of further abuse and oppression.” ⁷⁰

PART 2: LISTENING TO VICTIM-SURVIVORS

Throughout the NRNS project, attention was paid to the material needs and lived experiences of women and children subject to NRPF conditions. This informed the strategic direction of the project and ensured that women’s voices were the beating heart of the project. Documentation clearly demonstrated a corresponding line between the issues and challenges faced by victim-survivors on the ground in their localities, the project’s campaigning ambitions and the partners’ ability to increase professionals’ knowledge and capacity. Therefore, the partners sought both immediate policy change (for example through training and the development of local migration pathways in Manchester) and longer-term policy and strategic changes. This approach was further supported by the partner organisations’ development of trust-based relationships with victim-survivors, their intensive advocacy support for women and children with NRPF, their victim-survivor-centric involvement of women with lived experience across all existing women’s voices groups, and their ability to connect migrant victim-survivor experience with the development of policies and strategic advocacy. In effect, the project held, supported and walked with victim-survivors respectfully throughout the different stages of the project.

For this evaluation report, minutes, notes and transcripts from women’s voices and steering group meetings (which had oversight of the campaigning and policy elements of the project), interviews, group evaluations and development workshops were shared. Each organisation undertook bespoke *Changing the Narrative* evaluation questions with victim-survivors to understand their ongoing concerns past project end,

⁶⁹ Quote taken from interviews with professionals that worked across the NRNS regions

⁷⁰ Ibid.

their thoughts about the Investing in Safety model and the impact of the project's strategic advocacy and campaigning work. These evaluations were held between April and July 2024 with thirty-eight Black, minoritised and migrant victim-survivors that had been subject to NRPF conditions and involved in the NRNS project. Participants were able to converse in their chosen language and the sessions were conducted as group workshops or interviews with individual women (depending on the preferences of the women and their circumstances). The women's voices were deliberately captured verbatim by the facilitators, the evaluation responses outlined evaluation participants' understanding of the project's key achievements as the NRNS project came to a close, as well as their future concerns. Below, the quotes from the report evaluations are used to highlight and thematise the NRNS victim-survivor participants' experiences, observations and insights in their own words:

1. The experience and impact of exclusion from services and a lack of safety and protection from abuse and violence:

- a) *'Other organisations are very slow. We are always waiting for the support worker to come and visit us. They did not understand me, no time for me.'*
- b) *"Before accessing the services... I tried seeking help from other organisations such as Refuge but I didn't have any success here. In the end I made a self-referral."*
- c) *"In the beginning I didn't know where to look or how to find help, I didn't have any idea or know if there was an organisation that could help. I tried contacting the Brazilian consulate for help and two other organisations that I managed to find: Refuge and Casa do Brasil. However, they weren't able to help and instead signposted me to other organisations."*
- d) *"Accessing the services ... was the first time I was able to access support and find out valid information about my case, my rights and possible next steps. Before LAWRS, several times I thought about leaving everything. The other organisations that I contacted prior to LAWRS, advised me to opt for voluntary return. I was told to leave the country or I would be at risk of losing my child. I explained to them my situation, but yet this was the only advice that I received."*

2. The unique value and importance of specialist *by and for* services:

- a) *"As soon as you step into Ubuntu, the smiling faces of the women and the staff would just change your mood and make you forget everything and all your worries are left outside. Ubuntu helps a lot of people and I feel like it is an organization that needs to be put at the top. People who don't know Ubuntu need to hear the testimonies and acknowledge what Ubuntu is doing and how it is helping women. We should take any steps that are necessary to make the world hear about Ubuntu."*

- b) *"When I came here [S4S] I was empty. I had no money, nothing, only one dress. I did not know where to go. **When I came to S4S, I was able to shower, have food and was given money. I said is this really my money? In the past I was not allowed any money. Emotionally, I got all of the support I needed. I was told everyone has rights. I knew nothing about papers or universal credit, but I did not need to go alone. I never had to go to an appointment on my own.**"*
- c) *"Accessing the services at LAWRS was the first time I was able to access support and find out valid information about my case, my rights and possible next steps."*

In SBS's evaluation the facilitator also noted that:

"Women were not able to get treatments, due to lack of money they can't afford to move to another accommodation; they can't afford to pay lawyers; they can't live on the streets- they would be vulnerable to further abuse; would not be able to have money to eat without SBS support."

3. The impact of statutory and non-specialist multi-sectoral organisations' rights-based breaches:

- a) *"I remained in the hospital for 21 days. The hospital staff told me I was holding a bed for too long. I was homeless, I had nowhere safe to go. I received an NHS bill for these 21 days. LAWRS intervened and made a referral to Maternity Action; they helped have payment removed for the service user."*
- b) *"Social services coerced me to take my child, once born, to have contact with the perpetrator. I did not want this as I did not feel safe to go to where my perpetrator was, especially as I had to go on my own. My child was very young, a baby, and could not leave my child on their own."*
- c) *"The perpetrator offered to pay £100 monthly, which social services accepted - they put me in a difficult situation where I felt forced to see the perpetrator and take my child to him to see. Because social services accepted this offer, the perpetrator started harassing me, calling me and demanding to see my child. I eventually had a non-molestation order put in place as I didn't want any form or contact with the perpetrator."*

4. The impact of NRPF conditions on the long-term health and mental-ill health of migrant victim-survivors:

- a) *"NRPF- makes me feel and ask myself why did I come here? It's a safe place and I am not getting it here. This is making me emotionally down thinking WHY? But then I say to myself let me go to Ubuntu and feel belonged because the place is welcoming as soon as you stepped in from the door we feel joy and we forget about our situation"*

and we get the courage to socialise learn different skills, sewing, art and craft, poetry and creating writing crochet, planting...Ubuntu is a safe place, you don't come to Ubuntu and leave without a smiling face."

- b) *"So mentally you are constantly fighting battles of anxiety depression stress overwhelmness (sic) it's just a rollercoaster and this comes with a certain type (sic) stigma that you are always trying to hide from people specially when you are in a classroom or when you go over to the next course you are considered as unfit student and that is because of your immigration status."*
- c) *"The calming comes from going to organizations like Ubuntu and elsewhere. It's a sense of belonging when you come and you interact with people you may know outside but when you are in this kind of setting you come to know more about them and their skills and it's a learning process."*
- d) ***"NRPF is a restriction - it saddens me, and it's really depressing when you wake up and you have nothing to do, it's just like the system has buried you while you are still alive."***

5. The importance and potential impact of the Investing in Safety model

- a) *"A model like this that could provide more funding and support for organisations such as LAWRS would be really great to help me and other women that are in a similar situation. **If they had access to more funding, they could cover the expenses and find ways to protect us better without financial barriers. Organisations such as LAWRS are more** equipped to maintain confidentiality, there is greater trust in them."*
- b) ***"It seems like a good model for people who work with us to use to explain our situation to professionals and how difficult it is for us."***
- c) *"I hope this will help S4S to get more funding for this and challenge others."*
- d) ***"Investing in Safety model work is important; it helps exchange ideas and help SBS to do more; helping SBS would help vulnerable people more."***
- e) *"Services always think about money. They say we cannot help you because of money. This will show them it is better and cheaper to help us."*

6. The changes that are needed in the future to support migrant women and children victim-survivors who are subject to NRPF conditions

- a) *"Sometimes I could not sleep or eat, I would get support around this. I am asked if I am ok, I am given motivation. I am told we did nothing wrong; we have rights and everything. **We can then see we have rights and a future, and we can fight for our papers."***
- b) *"The approach with undocumented women needs to change. Before I started accessing support from LAWRS, everyone told me to return back*

to my country. Whereas LAWRS listened to me and understood my situation, they tried to find a pathway for me and see what my rights were and advocate my case. LAWRS first tried to find a solution to see if there was any and treated me first and foremost as a victim-survivor of VAWG.”

- c) *“We need to fight for our rights. You beat us, make trouble for us. The government should make easy rules for women to leave bad relationships and to know what their rights are, step by step.”*
- d) *“Why would the government not help me? Government should help people more if it helps them save money; also helps save us from danger.”*
- e) *“Women’s welfare should be prioritised- women are very vulnerable, for instance, male vs female accommodation- women and children are stuck in worse accommodation than men.”*

A Trauma-Informed Approach

“I left due to domestic violence and abuse, but not only from my husband but also from his family, police said they can only deal with my husband but not my family. That is not good enough. The government needs to make consequences for everyone abusing us.”

The NRNS project’s victim-survivor focus was trauma-informed and remained attuned to victim-survivors’ needs. It was fully recognised by the project partners that the brunt of any legislative changes, policy gaps and failures fell harshly on women and children victim-survivors, and that the project’s campaigning work could not be removed from this reality. The NRNS project adopted a trauma-informed approach across all activities to address the impact that abuse, exploitation, and systemic injustice have on the lives of migrant women, as well as staff, volunteers and partners. Victim-survivors, staff and volunteers all had access to therapeutic and clinical supervisory support throughout the project, this approach was essential to creating a safe, supportive environment for the NRNS project and reducing the risk of re-traumatisation. Across the partnership, staff were trained in trauma-informed practices and ways to deliver evaluations and interviews. Feedback from evaluations evidenced that there was a high level of trust in the partner organisations due to their deep understanding of the unique challenges faced by migrant women and the principles of their rights-based intersectional advocacy.

Rights Based Outcomes for Victim-Survivors

The table below outlines examples of the types of rights-based intervention support that migrant women with NRPf accessed from the NRNS partners within the life-cycle of the project. Cases such as these influenced the direction of the NRNS project’s strategic advocacy, policy and campaigning. The women featured in the example

cases below also participated in the Women's Voices and strategic campaigning work of the project which included speaking at public events, supporting lobbying events, participating in roundtables with high-level civil servants and providing testimonies at parliamentary committee hearings. Elements of each case have been further anonymised to protect the victim-survivors.

<p>Migrant Woman A has experienced severe sexual and physical abuse from her cousin since arriving in the UK. Perpetrator makes threats to kill family in country of origin if Woman A reports abuse. Ongoing abuse and threats leads to grievous injuries. MARAC conference shares information with the Home Office and local immigration enforcement officers.</p>	<ul style="list-style-type: none"> • Woman A's safety over immigration status is prioritised via Specialist Rights-Based Advocacy. Legal protections and institutional advocacy interventions prevents further harm or death, specialist expertise ensures woman accesses out of area refuges, civil protection orders, Honour Based Abuse (HBA) protocols and independent legal advice.
<p>Migrant Woman B brought into the UK on spouse visa (now expired) subject to domestic servitude and trafficked around perpetrator's extended family. Adult social care has assessed that she must be put into the asylum system.</p>	<ul style="list-style-type: none"> • Specialist assessments and rights-based advocacy ensures that woman B's high level of risk is evidenced and that she receives independent legal advice and her right to DDVC (now MVDAC) is upheld, service ensure that the woman is not forced to apply for asylum.
<p>Migrant Woman C is trafficked, sexually exploited by multiple UK national perpetrators, gives birth in the UK. Social services put her in a B&B for a night and attempt to remove her from the UK next day paying for an advance flight to country of origin.</p>	<ul style="list-style-type: none"> • Institutional advocacy work and challenges from NRNS partner intervenes in forced unsafe deportation of Woman C and ensures that Woman C and child are supported under Section 17 of Children's Act in the UK, whilst immigration application is made. Safety and rights of child are also prioritised.
<p>Migrant Woman D is subject to labour exploitation cleaning corporate offices, working 60-80 hours a week and forced to live in squalid conditions. She is subject to sexual harassment and violence from exploitation gang leaders. Against her wishes, police want to refer her into the National Referral Mechanism.</p>	<ul style="list-style-type: none"> • Woman D is supported with special measures when giving evidence and is protected appropriately as a victim of both MDS and VAWG. The NRNS partner advocates to ensure appropriate legal measures are in place to protect the woman, move her to a safe location, specialist NRPF refuge and help her access independent legal advice.

Figure 3: Case Summary & Intervention Table

PART 3: ANALYSING THE DATA

Project data outputs were analysed and compared with each organisation's global (full) organisational service-user demographic data, stakeholder referrals and service delivery data. A key challenge when analysing global data from a variety of organisations is the difference in the way they collect and term their demographic data. The NRNS project's quantitative monitoring system enabled each organisation to submit consistent data despite variance in the ways that each organisation collected data. The NRNS data shared was robust, evidenced and well-documented (aligning with Annual Reports and other public documents). The variance in ways of recording their global data and information – when compared with the NRNS Project – did limit the power and potential of the disaggregated data sets. However, there were a number of significant data findings and themes that could be clearly tracked across the span of the three-year partnership project:

- All five NRNS partnership organisations saw a large increase in the number of women with NRPF seeking support from their services. There was a 30-60% increase of victim-survivors with NRPF accessing each organisation. For example, S4S saw the number of NRPF victim-survivors accessing their refuge and advocacy services more than double and increase from 95 in 2021 to 196 in 2023.
- The severity and complexity of violence experienced by Black, minoritised and migrant women with NRPF (see the types of violence experienced by victim-survivors in Figure 4 below) was often exacerbated by, or it correlated with, higher levels of physical and mental ill-health.
 - Three organisations shared detailed data about service-user disabilities. Amongst the thirty case studies provided, more than 60% of women had co-morbidities that included complex mental ill-health issues, learning disabilities and mobility issues.
- All five organisations saw a general increase in the number of Black, minoritised and migrant women with NRPF needing to access recovery and therapeutic support. SBS, S4S and Ubuntu saw their in-take numbers for advocacy, therapeutic support and/or refuge support increase year-on-year by at least 10%.
- Where women with NRPF had children, child protection interventions by police and social services were less likely despite high levels of violence (according to both data and the case studies provided).
- The majority of NRPF victim-survivors self-referred into the NRNS partner organisations, referrals from statutory services averaged less than 10% of all referrals across services.
- Statutory service requests for advice and guidance (via the NRNS services that offered an NRPF Helpline) more than doubled, yet as above statutory agencies

accounted for less than 10% of referrals, this suggested that agencies' lack of knowledge and understanding impacted on their assessment at the referral stage.

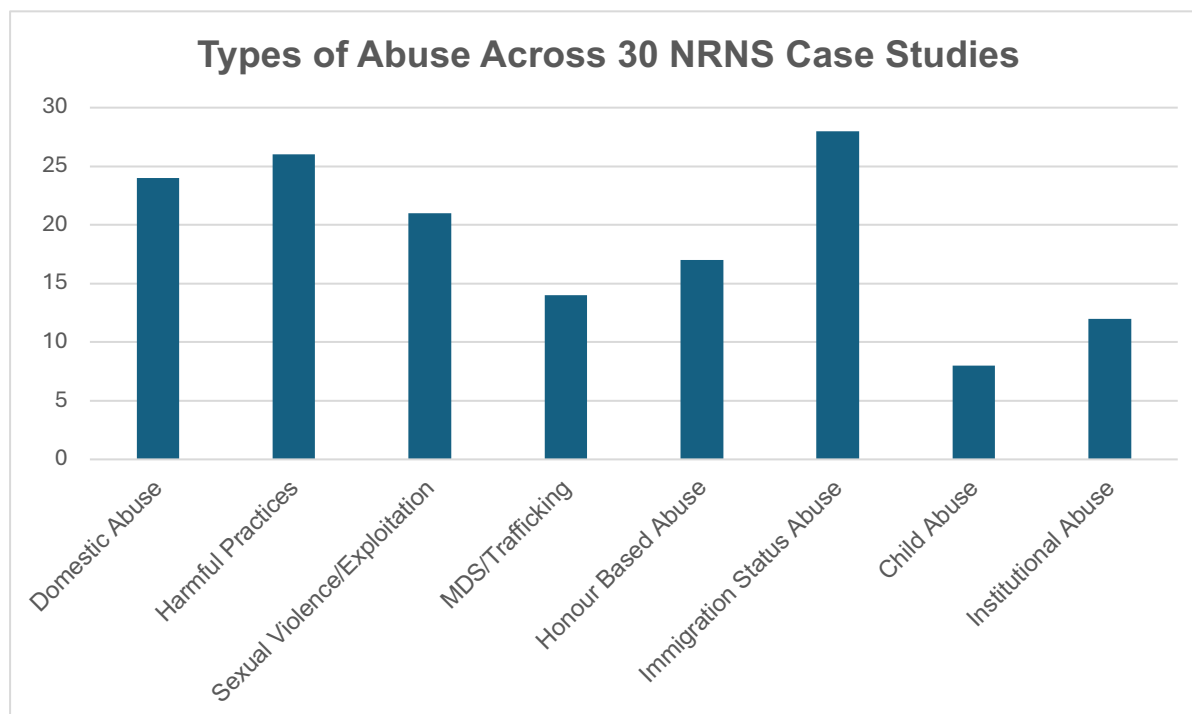


Figure 4: Types of VAWG recorded across the NRNS case study data set

Over 60% of the migrant women examined across the 30 case data set examined experienced four or more types of violence, with the majority (n=28) experiencing immigration abuse in addition to at least two other types of abuse. 21 women from the case study experienced harmful practices and over a third of women received discriminatory responses from statutory agencies.⁷¹

The NRNS victim-survivor case study data set generally reflected the overall demographics of the NRNS partner organisations' service-users. The organisations all used slightly different ways to categorise and record ethnicity due to the specific work they undertook and the differences in communities across boroughs and regions. The following diagram gives an insight into the diversity of women who participated in the NRNS project:

⁷¹ Discriminatory Responses from statutory agencies (including police and social care) were included in the *Types of Abuse* diagram in order to evidence the 'institutionalisation' of abuse perpetrated by statutory agencies due to poor policies, practice and knowledge. Although professional indemnity is often utilised in these cases, this does not reduce the harm that discriminatory statutory responses produce and the further risks that result from them.

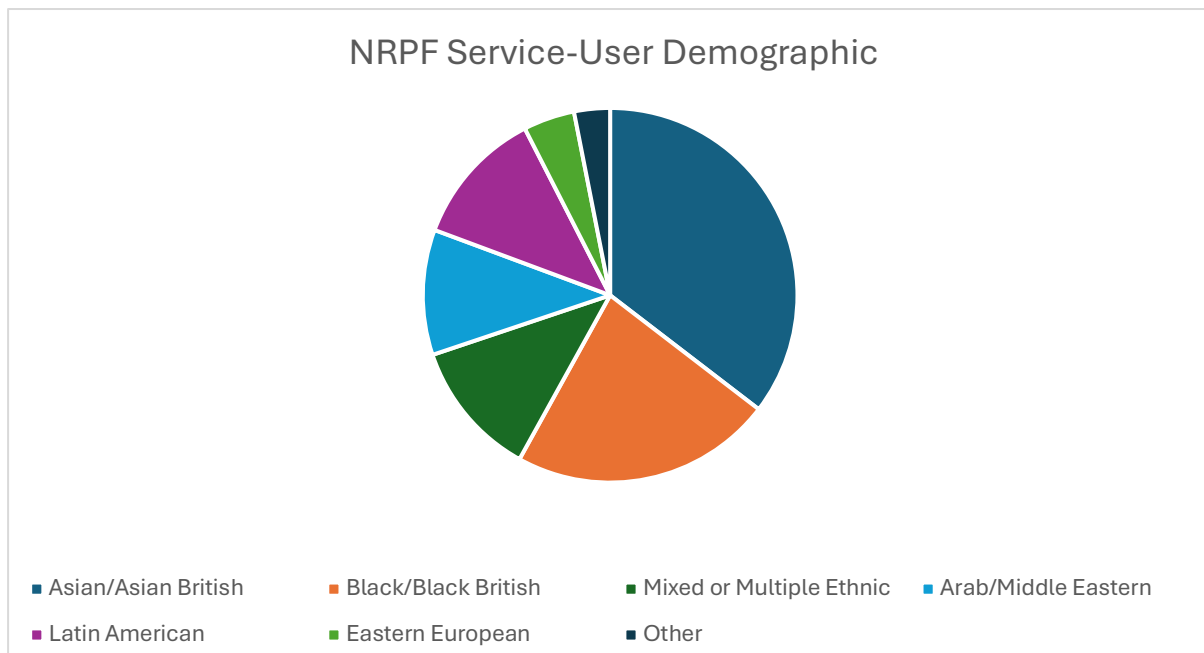


Figure 5: NRPF Service-User and Participant Demographic

The majority of victim-survivor participants identified as Asian or British Asian (43%), with 24% identifying as Black or Black British. There was proportionately higher number of women identifying as Arabic or Middle Eastern (over 10%) when compared to the organisations' collective global data, but other categories such as Latin American and East European women were proportionate across the five organisations when compared with their global demographic data set.

Stakeholders Feedback and Survey

“They provide life-saving material and specialist support to migrant women, whilst also drawing on this experience to carry out policy and campaigns work to tackle the structural conditions which facilitate the abuse and exploitation of migrant women. A strength is their values of feminism and anti-racism.”⁷²

As part of the project and evaluation process, interviews and discussions were held with key stakeholders and organisations that had supported the Investing in Safety model process, accessed training or had been an active supporter of the project campaigns. A digital Stakeholders Survey was also sent to the NRNS partners key stakeholder partners. This resulted in twelve responses from ending VAWG second-tier local authority commissioners and domestic abuse leads, health leaders and police. The survey gives an indication of the reliance that regional stakeholders in positions of leadership have on the expertise of the NRNS partners. The diagram

⁷² Quote provided by Stakeholder Survey respondent.

below illustrates the high frequency of contact those leaders had with the NRNS organisations, with 60% contacting the NRNS partners between five and ten times a month and a further 20% of respondents needing to contact the NRNS partners at least once a month for strategic advice and guidance.

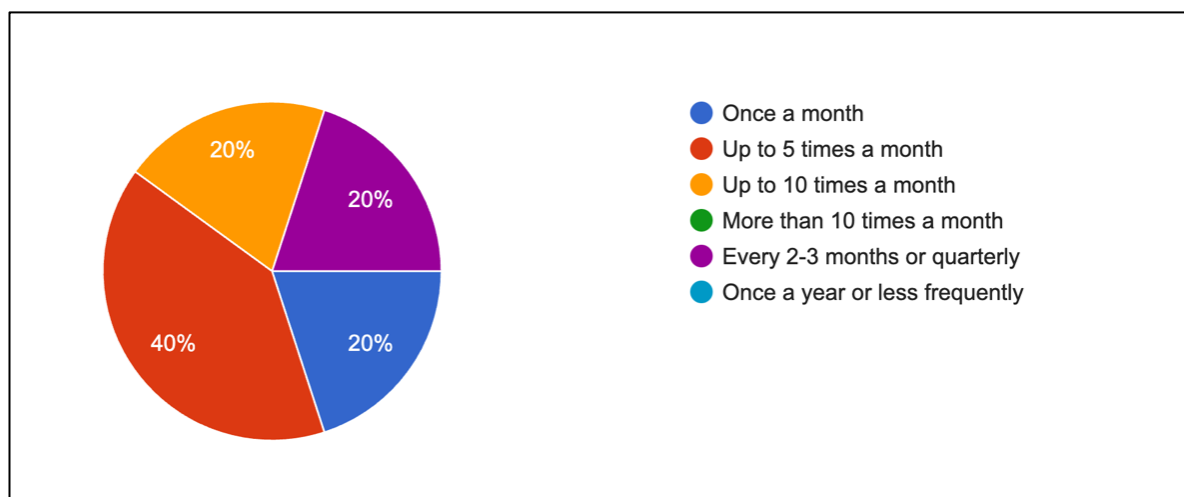


Figure 6: Frequency of NRNS Stakeholder Support

Respondents gave the following reasons for the frequency of contact which pointed to the integral role that the NRNS partners play in supporting stakeholders' work with migrant victim-survivors of abuse with NRPF:

- *“Expertise around the issues. Nobody knows more than these organisations the options available, the obstacles to surmount, the 'tricks' you can use to move the system, their level of expertise, knowledge and skill in the area of NRPF is unmatched.”*⁷³
- *“They (SBS) have a helpline that can be accessed by both individuals and organisations working with migrants. Their work is specialist because they take a lead in ensuring that the needs of migrants are recognised- and acted upon- across the UK.”*⁷⁴
- *“They have formed coalitions/collaborations, that have included us, to seek funds to provide support for Migrant Victims.”*⁷⁵

Project Challenges & Learning

“A key learning from this project has been the importance of the space and the flexibility for our campaign work. In the trend of short-term funding, this funding and the transformative results achieved have reinforced our belief in the vital

⁷³ Quote provided by Stakeholder Survey respondent.

⁷⁴ Ibid.

⁷⁵ Ibid.

need to campaign for sustainable, substantial and long-term funding for our campaign work.”⁷⁶

The NRNS project encountered many challenges, all of which were documented by the partnership, these were then further explored in workshops and interviews. Many of the issues that were experienced by victim-survivors materialised at a strategic level. The challenges the project experienced revealed external strategic challenges that stymied the partners’ ability to advocate for change.

- A lack of multi-sectoral clarity about the rights of women and children subject to the NRPF rules and conditions: despite an increased public awareness of NRPF, there remains a high level of strategic confusion about this matter that often leads to breaches of women and children’s legal and human rights.
- Ongoing changes to immigration legislation and policy compounded systemic inequalities: these gaps are most notable at pressure points where immigration related policy clashed with the safeguarding needs and rights of victim-survivors.
- The protective powers of local safeguarding and multi-agency pathways are under-utilised by agencies: the lack of clear guidance or inclusion of migrant victim-survivors leaves gaps in support, failures to protect and discriminatory outcomes. There is often a lack of knowledge and expertise that pre-empts the lack of will to address these issues.
- Specialist *by and for* services are presumed to be locally ‘responsible’ for migrant women and children despite rarely receiving any funding. In addition, there is a strategic exclusion of Black, minoritised and migrant organisations and an extension of the hostile environment applied to their workers when they are advocating for the rights of the women and children they support.
 - Where there was strategic inclusion of NRNS partners, the outcomes of victim-survivors radically changed and positive outcomes were achieved.
- Safeguarding protocols often have a negative impact on migrant women, leaving many women with no choice but to either return to perpetrators or face destitution and exploitation. As the Investing in Safety model development, economic modelling and case studies demonstrated, effective policy-making is impeding the possibility of smart pathways that could be vastly improving the safety of migrant women and children as well as saving local authorities money.
- In local contexts, generic and non-specialist women’s organisations’ involvement with migrant women is leading to dangerous and harmful outcomes for migrant women and children. Numerous examples in case studies showed that generic and non-specialist interventions led to further perpetration, destitution, removal of children, criminalization, and exploitation of women.

⁷⁶ Quote taken from the NRNS Project’s Year 3 monitoring submission to Comic Relief.

- Migrant women who do not have independent legal advice and specialist support are often being referred into inappropriate migration routes that put their lives and their children's lives at further risk.

“There’s so much work to be done, this is a drop in the ocean, this isn’t just about NRPF but about all of the systems around them.”⁷⁷

The project faced many external challenges and at times there were capacity issues due to the wide-reaching scope of the project and additional work that each organisation contributed. Boundaries had to be placed around what could be realistically completed within the timeframe of the project. This often led to a frustration that the partners could not address every gap and structural barrier or issue that they encountered. SBS took a strong lead in creating realistic boundaries for the project and determining what could be achieved by the project. The NRNS organisations remained disciplined in adhering to the workplan, particularly in relation to strategic advocacy and policy work, but in doing so they often identified additional corresponding areas that needed attention.

External socio-political changes have meant that the partnership has often had to:

“...be in reactive mode- the benefits of this project have been the ability of the partners to have capacity to make real change and embed it locally regionally and nationally through a well-designed plan, alongside the Investing in Safety Model.”⁷⁸

The passion and commitment each organisation worked with greatly enhanced the quality and depth of project work, but it also highlighted the need for investment in the research and policy work of frontline organisations. For example, when the Angelou Centre left the partnership, some additional resources were used to enhance the Investing in Safety model toolkit; that is the report, guidance and accompanying video, which had not been part of the initial project plan – but the NRNS partners and the Investing in Safety model consultant felt that the project should have had more resources invested in the launch and dissemination of the model. The Investing in Safety model consultant commented that there also remained a corresponding gap in:

“Survivor involvement in the design and on reflection evaluations as we went along with this process. I wish we had been given more resources for work with women.”⁷⁹

⁷⁷ Quote taken from interviews with NRNS partner project staff

⁷⁸ Ibid

⁷⁹ Quote taken from interviews with Investing in Safety model consultant, Fiona Sheil.

Intensive learning took place across the partnership during both the project and the nine-month evaluation process. From meetings, discussions and workshops with the NRNS partners, the following key areas of learning were identified:

1. Flexibility and adaptability enhance strategic direction: Partnership organisations lost skilled workers during Covid-19, this affected project leadership and staff roles which impacted on the project's first year. SBS had a change of management which left the NRNS project with an interim manager for a number of months; the Angelou Centre leadership changed which resulted in a loss of VAWG expertise and capacity, forcing the organisation to withdraw from the project after 18 months; LAWRS' VAWG Policy and Communications Manager, who had been integral to all their campaigning, moved on to a new organisation, and S4S and SBS appointed new Directors. However, the strength of the partnership and ability to work collectively enabled the partnership to successfully overcome these capacity issues. One of the NRNS project consultants commented:

"It's sometimes been difficult to keep up with changes in personnel due to post covid staffing changes, but the trust and expertise of each organisation has been amazing."

2. Funding increases leadership capacity: The project resourced the NRNS partners to better harness and galvanise their collective policy-making and strategic advocacy abilities. This project was unique in bringing together frontline policy-makers and campaigners with such a high level of expertise in working with migrant women. The project built the capacity of the NRNS partners to take on leadership roles in the wider women's and migrant sector, as one stakeholder commented:

"The partners were so articulate and knowledgeable about this subject, about the work and impact of NRPF, it was a very different project in that there were such experienced leaders in the room with me."

3. Creating space to reflect unlocks project solutions: The project unearthed potential future research spaces and highlighted the need to further invest in specific areas of frontline policy-making. The process of collating a high volume of case material for the purposes of the Investing in Safety model and the campaign was an integral component of the project and the granularity of detail observed throughout the project is unlikely to be replicated by non-frontline services:

*"The corporate sector holds a lot of power, but they don't get this work. This leaves the specialist sector holding a moral space that is historically rooted in Black feminism."*⁸⁰

⁸⁰ Quote taken from interviews with NRNS partner project staff

4. Centring victim-survivor expertise improved project development: The Investing in Safety model could not have been created without the NRNS partners' expertise in supporting the victim-survivors that contributed to the development of the project:

*"The model could never articulate the human cost of NRPF or what the women go through but it could prevent the level of harm and ensure that led by and for specialist services have equitable and fair funding to do this life saving work."*⁸¹

⁸¹ Quote taken from an interview with an NRNS Project Manager

Campaigns Timeline



Figure 7: NRNS Project Campaigns Timeline

PART 4: PROJECT IMPACT

“The way that campaigning is understood is very different, this project gave us the opportunity to consider this and to afford spaces to campaign in ways that are responsive and immediate to the work we do. We have our own hard fought for tradition of activism.”

The NRNS project’s ambitious aim to end NRPF continues to be a strategic work in progress and the project has made critical in-roads towards this outcome. The partnership continued to effectively challenge and nudge social, cultural and political bodies towards this goal and the many challenges and barriers have not deterred the NRNS project at a national level and the partners at more local and regional levels. The project has made both significant incremental changes and steady progress against what has been a tidal wave of setbacks driven by the lack of political stability, a return to austerity level public spending caps following Covid-19 and the recent cost of living crisis.

Throughout the NRNS project, the partnership was relentless in their ongoing strategic advocacy, campaigning and lobbying to change the national narrative around migrant women and to broaden an understanding of the issues, concerns and imposed barriers migrant women face and experience. By tackling multi-sectoral and institutional discrimination through legislation conducive to holding the state to account (such as the Equality Act, tabling amendments to the Victims and Prisoners Bill, and the Istanbul Convention) the partners were able to address and inform policy and procedural changes locally and through the project’s participation in influential expert networks such as the London VAWG Consortium, DAC’s Supporting Migrant Victims working-group, national VAWG Stakeholders Advisory Group and the Labour Exploitation Advisory Group.^{82 83 84} The partnership organisations’ strategic participation span across more than 30 networks allowing them to have a significant impact on national and regional strategic decision and policy-making in relation to Black, minoritised and migrant victim-survivors. The NRNS partner networks also guaranteed their inclusion in key strategic influencing spaces in which migrant women, VAWG and NRPF were being discussed. For example, LAWRS and SBS presented evidence for the DAC’s House of Lords Briefing in April 2024 for the Victims and Prisoner’s Bill, following three years of consultation between the DAC office and NRNS partners whose research and case studies informed DAC’s briefing.⁸⁵ Another case in point is the NRNS project’s campaign led by SBS and LAWRS to drive forward change and awareness around the reservation of Article 59 in the Istanbul Convention

⁸² <https://www.thelondonvawgconsortium.org.uk/>

⁸³ <https://labourexploitation.org/what-we-do/networks-and-coalitions/labour-exploitation-advisory-group-leag/>

⁸⁴ <https://domesticabusecommissioner.uk/partnerships/>

⁸⁵ <https://domesticabusecommissioner.uk/wp-content/uploads/2024/04/Lords-Report-Stage-Firewall-Briefing-DAC-Office-April-2024.pdf>

through their involvement in the IC Change Campaign.⁸⁶ SBS led work on NRPF and influenced DAC's research on cost benefits and longer-term solutions. Discussions with the Home Office also led to the extension of the MVDAC, which was a step in creating longer-term change in relation to NRPF conditions. The need for reform on the firewall and/or NRPF was supported or considered by various committees to which SBS and/or LAWRS gave evidence such as the Justice Committee, Home Affairs Select Committee and the Women and Equalities Committee. These reforms were also mentioned in the Labour Party pre-election Green Paper on VAWG ⁸⁷. Such discussions continued with the new Labour Government post-election. The partners also regularly participated in regional and national media events, seminars and presentations (see Appendix C).

These powerful examples demonstrate the way that astute strategic planning and engagement can embed regional and local policy change and improve accountability structures to ensure that the rights to safety and protection for victim-survivors of gender-based violence are preserved. Without the NRNS partners' collective expertise in developing campaigning, policy-making, strategic advocacy *and* frontline work with women and children victim-survivors it would have been impossible to shift the dial. ⁸⁸

Specialist *by and for* services that advocate for migrant women with NRPF were supported to leverage additional support for victim-survivors. Training, guidance and strategic advocacy guidance was extended to sister *led by and for* networks, particularly the northern NRPF network and members of the London VAWG consortium members who were both consultants and beneficiaries of the Investing in Safety model. Many of these frontline organisations formed part of the NRNS Northern and Southern steering groups and participated in supporting the project's campaign and strategic policy work and provided the research and evidence needed to make the Investing in Safety model a suitable tool across the two nations.

The NRNS project's strategic achievements are numerous and complex; in order to capture their impact in the evaluation a summary of each project year has been collated to demonstrate the way that the project has changed the national narrative around migrant women subject to NRPF conditions. The Campaigns Timeline in Figure 7 on p.48 gives a chronological overview of the NRNS project's campaigning highlights.

⁸⁶ <https://x.com/lawrsuk/status/1551491606506864640>

⁸⁷ <https://labour.org.uk/wp-content/uploads/2021/05/Ending-Violence-Against-Women-and-Girls-Green-Paper.pdf>

⁸⁸ Quote taken from NRNS Monitoring Submissions: *"This campaign work has involved working with a range of stakeholders including National Policy makers/ statutory organisations such as the Home Office and the Police; regional and local commissioners and policy-makers; legal professionals; politicians; key civil society communities, including grassroots by and for organisations and survivors of abuse."*

Year One Outcomes Summary: September 2021- August 2022

Year one of the project saw the Nationality and Borders Act receive royal assent, and the Immigration Enforcement data-sharing procedures being discussed with the Home Office. There continued to be a lack of progression of any policy decisions following the SMV pilot by the government until there was eventually an extension of this pilot. The government's reservation of Article 59 of the Istanbul Convention further excluded migrant women from domestic protection by failing to provide right to residence and thus also failing on international treaty compliance. The government cited not having the results of the SMV pilot as being the reason for this reservation, even though the SMV pilot only dealt with providing support and not the right to residence and that decisions in relation to the pilot had been delayed by the government.⁸⁹

Year 1: Key Outcomes & Evidence	
1.	Campaign to lift the NRPF conditions and rules: <ul style="list-style-type: none"> a) Advised DAC and regularly participated in ongoing consultations. b) Supported women to attend the DAC's Support for Migrant Victims Group c) Advised researchers at London School of Economics on their cost-benefit analysis of NRPF for DAC's report 'Safety before Status: The solutions' and which later also informed the Investing in Safety model.⁹⁰ d) LAWRS facilitated a victim-survivor's round-table, which included the participation of the Women's Voices groups and NRNS Partners. e) The Angelou Centre were research partners in a Northumbria University project that examined financial exploitation where the Angelou Centre provided evidence around NRPF from the NRNS Partners. f) SBS mobilised 2 NRPF victim-survivors round-tables with Jess Phillips MP, who is now the Parliamentary Under-Secretary of State for Safeguarding and Violence Against Women and Girls.
2.	Development of Safe Reporting Pathways: for Northumbria PCC: Policy, procedure & guidelines – led by the Angelou Centre.
3.	Development of rights-based NRPF training for health practitioners in Scotland: Ubuntu worked in consultation with Arika and local health bodies in Glasgow and Edinburgh. ⁹¹
4.	Strategically advocating for the implementation of a firewall to prevent data sharing: – led by LAWRS

⁸⁹ The government has said that their position on Article 59 is under review "pending the results and evaluation of the support for migrant victims scheme". The scheme has "provided accommodation and wrap around support for migrant victims of domestic abuse with no recourse to public funds, as well as providing the data required to inform subsequent policy decisions".

<https://lordslibrary.parliament.uk/istanbul-convention-preventing-and-combating-violence-against-women-and-domestic-violence/>

<https://www.gov.uk/government/publications/council-of-europe-convention-on-preventing-and-combating-violence-against-women-and-domestic-violence-ms-no32022>

⁹⁰ <https://www.lse.ac.uk/geography-and-environment/research/lse-london/documents/Reports/Social-Cost-Benefit-Analysis-of-the-NRPF-policy-in-London.pdf>

⁹¹ <https://arika.org.uk/>

	a) This included regular meetings with civil servants and DAC in view of consultations around the Victims and Prisoners Bill. This work continued into year 3.
5.	Presentation of NRPF & HBA and firewall concerns at the Justice Committee, Home Affairs Select Committee and Women and Equalities Committee: Significant strategic engagements led by SBS and LAWRS.
6.	Hague Convention – Legal Advocacy: SBS was one of six interveners in this significant case at the Supreme Court, which raised important legal questions about the interplay between the Hague Convention that enables the prompt return of abducted children to their country of residence, and the 1951 Geneva (Refugee) Convention which protects those entitled to asylum from being returned to the country from which they seek refuge. SBS intervention followed an earlier intervention in the Court of Appeal [2020] EWCA Civ.1185].
7.	<p>The NRNS partners also attended and represented the project at seminars, conferences, working groups and across forms of digital and video media. A selection of media examples from 2022 include:</p> <ul style="list-style-type: none"> • SBS's work on NRPF featured on BBC TV London News: (https://www.bbc.co.uk/news/uk-england-london-60509125) • International Women's Day Blog: https://southallblacksisters.org.uk/uncategorized/marketing-international-womens-day-the-struggle-continues/ • S4S victim-survivors writing/voice work group publishing "This is We" anthology of poems and writings supported online by influential national and international women authors and launched in March 2022 attracting 150 local writers, activists and VAWG sector leads.

Year Two Summary of Outcomes: September 2022- August 2023

In the second year of the NRNS Project concerns about national legislation and social policy continued to inform the campaigning strategy and the Investing in Safety model went into full production. Its development included the analysis of thirty detailed case studies from across the partnership, additional participation in the Investing in Safety stakeholder consultation meetings and advisory groups, and consultation with Women's Voices groups. Various aspects of the project pivoted around the government's harshening of existing immigration legislation. The partners' close working relationship with DAC continued as the NRNS partners worked with her office to support further research into the cost-benefits of supporting migrant women. DAC launched the report at the House of Commons and SBS and S4S spoke about the NRNS project and the impact of NRPF on migrant victim-survivors. Alongside the Investing in Safety model work, the partners' training commitments also increased with the main bulk of delivery taking place at end of Year Two (and early into Year Three) of the project. Unfortunately, the project also had an internal set back when the Angelou Centre, due to leadership capacity issues, had to leave the partnership in February 2023.

SBS secured the SMV pilot funding for another year. London Metropolitan University's external evaluation of the SMV pilot provided a significant amount of evidence in support of the NRNS project's longer term policy solutions to abolish the NRPF rule and to extend the DDVC (now the MVDAC) and DVILR to all victim-survivors of domestic abuse, no matter their immigration status. The Home Office evaluation of the SMV pilot evidenced the need for more support for migrant victim-survivors, which helped the campaign.⁹² These critical issues meant that the strategic advocacy, campaigns and policy work had to be adapted to include these key issues.

In 2022, SBS won a case in the Supreme Court on transnational marriage abandonment which resulted in migrant victim-survivors abandoned overseas by their abusive partners getting the right to return to the UK under the DVILR.

Year 2: Strategic Outcomes & Impact	
1.	16 Days of Activism campaign: to coincide with SBS's 30 years of campaigning event and the celebration of two decades of DVILR and tenth anniversary of the DDVC, now know as the MVDAC). This took place in the House of Commons and was attended by 40 key parliamentarians, policy-makers and ending VAWG strategists, including the Minister for Safeguarding.
2.	SBS, LAWRS and S4S gave oral evidence regarding migrant victim-survivors to the Home Affairs Select Committee: and made NRNS policy recommendations (such as ending the NRPF rule and the introduction of a firewall). <ul style="list-style-type: none"> SBS also gave oral evidence to the Women and Equalities Committee regarding the impact of NRPF.
4.	Represented specialist services at national IC Change campaign: to hold the state to account under the Istanbul Convention and to ratify the convention, SBS and LAWRS gave speeches and expressed concerns about the plight of migrant women. <ol style="list-style-type: none"> The Istanbul Convention was ratified during this year, which was one of the hoped for legislative outcomes of the project. SBS and LAWRS continued to campaign to remove the reservation on Article 59 on migrant women.
5.	NRNS Campaigning influenced the parliamentary Justice Committee recommendation of the introduction of the firewall to the Victims and Prisoners bill. ⁹³ <ul style="list-style-type: none"> This was rejected by the government in 2023. LAWRS secured the tabling of amendments in parliament on the firewall. <p>SBS also introduced amendments on NRPF to the Victims and Prisoners bill.</p>
6.	S4S secured changes across Manchester police with the introduction of Safe Migrant Pathways and guidance: Following the Angelou Centre model that has been adopted across the Northumbria Police.

⁹² <https://southallblacksisters.org.uk/submissions-campaigns/support-for-migrant-victims-fund-evaluation/>

⁹³ <https://hansard.parliament.uk/commons/2023-06-20/debates/cf5c3cf1-a23d-4a46-bd9dff9e93ff372f/VictimsAndPrisonersBill>

	a) Meetings took place with the National Police Chiefs Council (NPCC) to discuss the introduction of the Safe Migrant Pathways guidance across forces.
7.	<p>SBS's SMV pilot was extended for another 2 years, following input from the NRNS partners:</p> <p>a) <i>Living At the Edge</i> an external evaluation of the SMV pilot by London Metropolitan University is published and amongst other findings produces evidence that:</p> <p><i>"Immigration controls strengthened the power of abusers and women described the way their immigration status was a constitutive part of their experiences of physical, emotional and sexual violence."</i>⁹⁴</p>
8.	<p>SBS won a case in the Supreme Court on transnational marriage abandonment: This means that migrant victim-survivors abandoned overseas by their abusive partners have the right to return to the UK under the DVILR.</p>

Year Three Summary: September 2023-August 2024

The final year of the NRNS Project culminated in a General Election (July 2024) and observed the project coming to full fruition resulting in a range of outcomes and achievements that went far beyond the original scope of the project. This demonstrated the strength of the project partnership, as their achievements came amidst a backdrop of hostile political changes, policy decisions, legislation and legislative amendments that directly impacted the safety of victim-survivors with NRPF. It also saw the completion, piloting and launch of the Investing in Safety model, and production of a research report, video and written guidance to make the Investing in Safety cost-benefit calculator accessible to community, statutory and multi-sectoral stakeholders.⁹⁵

CEDAW was delayed for another year (it is expected to take place in 2025). The NRNS project redirected this component of the original workplan toward extensive work on written and in-person submissions to the UN Rapporteur on VAWG and GREVIO, which included full sector and northern regional submissions.⁹⁶ SBS also gave evidence to the Covid-19 Inquiry about the impact of the pandemic on migrant women.

In the third year of the project LAWRS and SBS launched a strategic litigation in partnership with the Public Interest Law Centre to challenge the introduction of the MVDAC scheme which while extending the reach of the scheme to women whose partners are on work and student visas, it limits the duration of the scheme to just three months and does not give them access to the DVILR. Although a step in the right direction (which was an achievement for SBS and the partnership), this detrimental

⁹⁴ <https://southallblacksisters.org.uk/app/uploads/2023/08/final-cwasu-evaluation-of-the-support-for-migrant-victims-programme-12th-june-2023.pdf>

⁹⁵ <https://southallblacksisters.org.uk/app/uploads/2024/04/investing-in-safety-report-final.pdf>

⁹⁶ <https://www.coe.int/en/web/istanbul-convention/grevio>

move by the former government goes against all evidence produced by the NRNS partners and the SMV evaluations (as cited).^{97 98} Although the legal challenge against the MVDAC had to be withdrawn due to limitations in the law, SBS and LAWRS continue to look for new grounds for strategic litigation against NRPF and a lack of a firewall policy.

As the NRNS Project drew to a close, the campaigning did not. The partnership, led by SBS, continued to campaign for migrant women's rights in the run up to the general election and lobbied Labour cabinet members such as Alex Davies-Jones MP and Jess Phillips MP as well as ministers that held immigration related portfolios. Following the event of the far-right riots, the NRNS partners delivered their final campaign to the doors of Downing Street.

Year 3: Strategic Outcomes & Impact	
1.	<p>Strategic advocacy and campaigning to extend the DDVC and the DVILR to all migrant victim-survivors resulted a shift in the right direction but limited by partial reform. The DDVC was expanded to include partners of student visa and work permit holders for the present three-month period, as well as renaming the entire scheme Migrant Victims of Domestic Abuse Concession (MVDAC).</p> <p>a) As a result the partnership:</p> <p><i>“spearheaded the resistance to this change arguing that separating the DDVC granting access to funds from the right to settlement under the Domestic Violence Indefinite Leave to Remain (DVILR) would prevent many victim-survivors from not coming forward for fear of deportation, and it would leave victim-survivors on a cliff-edge after three months, putting them at risk of falling out of status.”⁹⁹</i></p> <p>b) Submission of an open letter by SBS (signed by 59 organisations) to the Home Secretary protesting these changes.¹⁰⁰</p> <p>c) SBS convened an online public meeting on the campaign which was attended by over 140 people. Sarah Champion MP spoke among other guests and a message of support from DAC Nicole Jacobs was read out.</p>
2.	<p>SBS & LAWRS inputted into the national Shadow Report for GREVIO on the Istanbul Convention and evidence sessions for the UN Special Rapporteur on VAWG.</p>
3.	<p>S4S and Ubuntu co-produce GREVIO report with the ‘Resist Network’ and 8 other by and for organisations from Northern England and Scotland.</p> <p>a) Members of the NRNS partnership gave evidence at GREVIO round-tables and S4S met with the Rapporteur in Manchester, and SBS and LAWRS in London.</p>

⁹⁷ <https://southallblacksisters.org.uk/app/uploads/2023/08/final-cwasu-evaluation-of-the-support-for-migrant-victims-programme-12th-june-2023.pdf>

⁹⁸ <https://southallblacksisters.org.uk/app/uploads/2023/01/safe-secure-report.pdf>

⁹⁹ Quote taken from the NRNS Project's Year 3 Monitoring report to Comic Relief

¹⁰⁰ <https://southallblacksisters.org.uk/news/harmful-changes-to-support-provisions-for-migrant-victims-of-domestic-abuse-2/>

	b) SBS gave evidence to the Covid-19 Inquiry as a core participant.
4.	LAWS and SBS commenced a strategic litigation process with the Public Interest Law Centre to challenge the detrimental impact of the NRPF conditions on migrant victim-survivors.
5.	Investing in Safety model resources were launched in April 2024, a national online event attended by nearly 200 professionals, where DAC Nicole Jacobs spoke about the importance of this model, and the Principal for Victims and Vulnerability at the Greater Manchester Combined Authority vowed to use the model for a year. ¹⁰¹ a) Since the launch event, the partners have presented the model to over 300 professionals.
6.	In response to the far-right riots SBS co-ordinated a list of demands for the Prime Minister to tackle the root causes of the far-right which were signed by 65 organisations and handed in to 10 Downing Street by the Executive Directors of SBS, LAWRS, S4S, Imkaan and Women for Refugee Women, and was covered by Channel 4 prime-time news.

¹⁰¹ <https://southallblacksisters.org.uk/news/investing-in-safety-launch-event/#:~:text=Investing%20in%20Safety%20makes%20a,%2C%201%2D2%3A30pm.>

CONCLUSION

The No Recourse? No Safety! project was a groundbreaking project. The funding from Comic Relief enabled the partnership to have the full capacity to develop and utilise their decades of campaigning, policy and strategic expertise to authentically represent the voices, concerns and needs of migrant victim-survivors from the frontline. The project succeeded in radically changing the narrative around migrant women with NRPF, empowering the partnership to address systemic issues and creatively work together to confront structural inequalities and discrimination. Although the project was self-consciously ambitious, it was also diligently co-ordinated, planned and organised to ensure maximum impact could be achieved on the ground, even where statutory and legislative barriers were presented.

The NRNS project has not only raised awareness of the plight of migrant women and children but has produced clear implementation routes to navigate the hostile environment and complexities of NRPF policy-making. The policy component of the NRNS project was far-reaching and impactful, leaving a legacy of change that will continue to strengthen the rights and position of migrant women and children, despite recent detrimental legislation.¹⁰² The Investing in Safety model and Safe Reporting Pathways for Migrant Women (across Northumbria, Manchester and Surrey) created a formative space to improve equality of access for Black, minoritised and migrant women to specialist and universal services that offer support, safety and protection. Through effective campaigning strategies, the partners also found a way to creatively dismantle legislative and public policy roadblocks that prohibited progress by reframing local commissioning, safeguarding and partnership arrangements to embed new ways of re-envisioning migrant victim-survivor safety.

In conclusion, the NRNS project data and outcomes highlight four themes that will be critical to future policy-making:

1. NRPF conditions significantly impacts the prevalence and severity of violence, abuse and risk experienced by migrant victim-survivors.
2. Statutory services' need for advice and guidance about NRPF has largely increased during the course of the project, yet statutory referrals into specialist services remain very low. This suggests that these agencies may be stalling or neglecting their duty to protect and safeguard NRPF victim-survivors in appropriate ways.
3. Disability and co-morbidity appear to be more prominent amongst victim-survivors with NRPF when compared to the global data of the five NRNS partners. The case studies would suggest that migrant women endure not just

¹⁰² For examples see earlier discussion of SBS's contribution to the extension of the MVDAC, LAWRS clear directives around the need for a 'firewall' and S4S' further development of local migrant women's pathways across Manchester.

higher levels of disability, but also a much lengthier time without health support and necessary interventions (due to a lack of health access). Health advocacy and mental ill-health advocacy is another 'silent' area of support provided by specialist *by and for* services, further backing the importance of including health in the Investing in Safety Model. This also aligns with the findings of the Investing in Safety model which estimated that the highest savings for any public service-area are incurred by the NHS.¹⁰³

4. Abuse specifically related to victim-survivors' insecure immigration status is the most common and yet under-assessed type of abuse by agencies that victim-survivors subject to the NRPF conditions experience. The abuse of women due to their immigration status underlies the majority of the partnership's high-risk cases.

The NRNS project was rooted in the experiences of victim-survivors and their children, who are often at the knife edge of widescale human rights abuses that are a result of NRPF conditions. Investment in the project by Comic Relief has enabled frontline experts in the field to reframe narratives and understanding of the ways in which VAWG is further compounded and institutionalised by the NRPF condition. The project has had a truly intensive reach; from campaigning for legislative change, to influencing local and national policy and raising public and community awareness about the rights of migrant victim-survivors. These achievements have been strategic and pragmatic, making both immediate and long-term differences to the lives of migrant victim-survivors and directly improving the practice of the agencies that support them. The evidenced impact of the NRNS project and outcomes have led to the recommendations outlined below.

Report Recommendations

1. **Exploration of Innovative Projects that Centre Migrant Women and Children:**
 - a. The development of an 'expert consortium' that utilises the project's learning and development to generate a future sustainable shared income. For example, rights-based systems training to improve multi-sectoral responses to migrant women subject to NRPF conditions.
 - b. Resourcing the development of a migrant women's rights and campaigning policy hub to capture and document the project's knowledge and expertise.
 - c. The incorporation of thematic areas of inquiry that emerged from the project into the development of new consortium projects.

2. Funding for Policy and Research from the Frontline:

¹⁰³ <https://southallblacksisters.org.uk/submissions-campaigns/investing-in-safety/>

- a. Further external investment in public policy and research that is rooted in the expertise of regional *by and for* Black, minoritised and migrant women's ending VAWG organisations.
- b. Funders such as Comic Relief choose to invest in frontline policy campaigners and researchers that are able to work in a victim-survivor-centric way and authentically represent regional and frontline concerns.

3. Further Investment in the Investing in Safety Model:

- a. Additional funding is sought to further implement the use of the Investing in Safety model across regional and local community, statutory and multi-sectoral networks.
- b. Future iterations of the Investing in Safety model consider an expanded framework that include costings relation to 'public safety' and preventative work undertaken with migrant children and young people.

4. Development of Specialist Health Outcomes and Indicators:

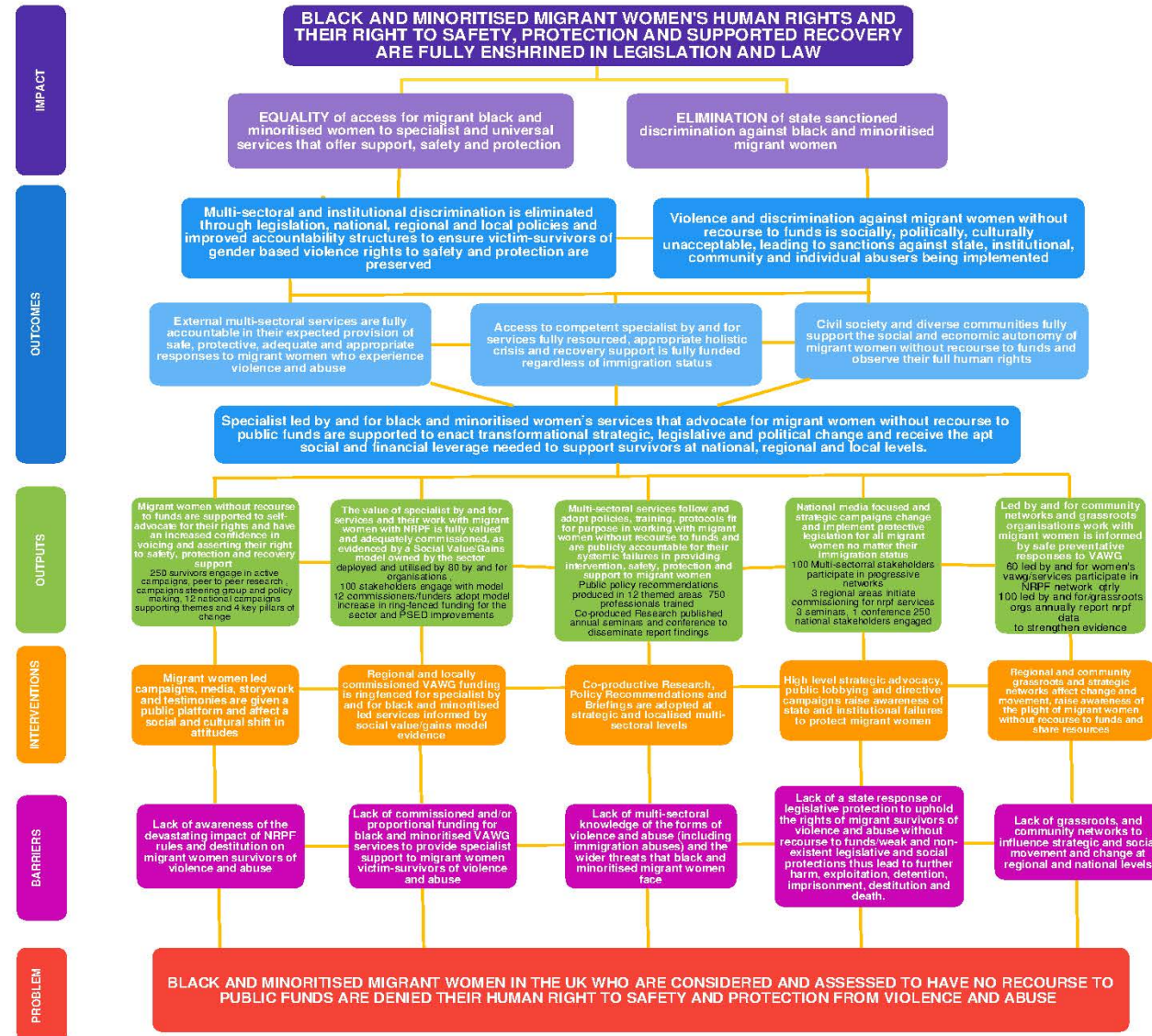
- a. Black, minoritised and migrant women led *by and for* organisations make a significant contribution to improving the physical and mental health of migrant women and children, but these are not fully captured and measured by the sector.¹⁰⁴
- b. The impact of NRPF conditions on the physical and mental health of future generations of children is a much-needed area of research.

¹⁰⁴ This should include research into women and children with disabilities *as well as* health co-morbidities.

APPENDIX

Appendix A: NRNS Project Theory of Change

Theory of Change CM V1 - Matrix Organizational Structure



Appendix B: Intersectional Advocacy Model

(Quoted in the Investing in Safety Report)

Defining Intersectional Advocacy

- Recognising the overlapping issues of oppression, discrimination and social identity in each woman's life
- Being open to exploring how these have played out in her life, the layers of abuse and violence she has encountered – working with current issues and historic legacies
- Understanding the complexities of family and community, and how this may make certain forms of action more difficult to take
- The importance of voice – finding, using and centring it
- Creating spaces in which BME women feel recognised, within which they can belong
- Challenging other organisations to recognise this complexity, to not offer options which are inappropriate for black, minoritised and migrant women
- Recognising who is not using services and offering routes to reach out

Lifted from: National Lottery Community Fund Women and Girls' Initiative, Safer Pair of Hands: Black and Minority Ethnic (BME) specialist violence against women work, 2020

Appendix C: Media Examples & Links

<https://southallblacksisters.org.uk/news/open-letter-on-immigration-changes/>
<https://southallblacksisters.org.uk/news/legal-challenge-protection-for-migrant-victim-survivors/>
<https://southallblacksisters.org.uk/news/investing-in-safety-launch-event/>
<https://southallblacksisters.org.uk/news/harmful-changes-to-support-provisions-for-migrant-victims-of-domestic-abuse-2/>
<https://southallblacksisters.org.uk/news/open-letter-on-immigration-changes/>
<https://southallblacksisters.org.uk/news/governments-response-to-wec-honour-base-abuse-report-another-missed-opportunity/>
<https://southallblacksisters.org.uk/app/uploads/2024/07/ge-2024-key-demands-for-migrant-victim-survivors.pdf>
<https://southallblacksisters.org.uk/news/demands-for-the-prime-minister-to-tackle-the-root-causes-of-far-right-riots/>

Appendix D: Full Project Outputs (End of Project Monitoring)

	Target		Achieved
NRPF National Campaign	1000	Victims and Prisoners Bill amendment, MVDAC policy change consultations, visa changes open letters, public meeting and investing in safety launch	1000
NRPF Regional Campaign	1000	Northern firewall, Refuge festival attended by Ubuntu, Greater Manchester Combined Authority adopting Investing in Safety model	1000
Firewall Campaign	200	Public meeting, Victims and Prisoners Bill amendment	200
Istanbul Convention Campaign	200	GREVIO shadow report	200
Statutory sector stakeholders participate in NRPF strategic work to initiate and enact change in 3 key areas; Commissioning; Policy and Public-Sector Equality Duties; NRPF policy changes, recommendations adopted by VAWG Strategy Groups.	100	Key working groups attended throughout the year, open letters signed, attendance at events, VAWG sector manifesto included recommendations, Investing in Safety report and discussions with DAC on <i>by and for</i> funding pot.	100
Annual seminar organised and delivered digitally around key themes and what's missing for NRPF survivors	85	Public meeting on NRPF in November 2023, Investing in Safety launch in April 2024, and House of Commons reception in 2022	331
Training provided to professionals to improve knowledge and practice around NRPF	250	Bespoke training for orgs	320
Sustaining Solutions: Gains/Social Value Model developed with stakeholders in order to be adopted as benchmark for commissioning and fundraising purposes	12	Bespoke training for orgs Commissioners and other sector professionals engaged since launch	243
Strengthening Networks: BME led organisations participate quarterly in Northern/Southern NRPF networks, covering 12 regions of the UK	60	Regular working group meetings by partners or led by partners	60
Shifting the Narrative: Women's Voices Steering Groups develop 'Storywork' methodologies	50	Support group attendance	1161

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Areas of Expertise & Qualifications of the Author

This evaluation report has been prepared and written by Dr. Rosie Lewis (End VAWG Consultancy)

Rosie Lewis has worked in regional and national strategic advocacy, infrastructure, frontline, research and policy roles supporting Black, minoritised and migrant survivors and organisations to end VAWG. Recently she has been commissioned to develop and write policy briefings, evaluations and research reports for academic hubs, specialist VAWG organisations, funders and national second tier infrastructure organisations. She has over two decades of experience working with, assessing, and advocating for Black and minoritised women and children including those with uncertain immigration status, NRPF and those in detention. This has included a substantial amount of work developing children and young survivor's services and influencing local, national, and international policy work in relation to multiply marginalised women and children.

Rosie has extensive experience of fundraising and commissioning. She has developed and set up regional and national women's networks and organised national conferences and seminars. She has worked as an independent consultant and trainer and has advised on and written policy documents and reports for national charities and various multi-sectoral organisations. She has been involved in the development, management, and sustainability of refuges and move on accommodation which included external partnerships with housing agencies, and NRPF specific refuge accommodation. Rosie has also worked as a consultant in the culture, heritage, and arts sector. She is both IDVA and ISVA qualified, has a Level 5 qualification in Safeguarding, holds a 1st Class Hons Degree, a Masters in Research and Doctorate in Philosophy from Durham University.