14 October 2026

Rt Hon Andy Burnham MP
Prime Minister
10 Downing Street
London
SW1A 2AA

Re: Impact of the Earned Settlement Proposals on Victim-Survivors of VAWG

"The only qualification for access to support, housing, refuge, social security, and police protection for victims of domestic abuse in this country should be this: are you human?"[1] -

Rt Hon Jess Phillips MP

Dear Prime Minister,

Congratulations on your appointment as Prime Minister, we wish you every success in your new role. **We write as a coalition of specialist VAWG and *by and for* organisations to raise our deep concerns about the impact of the Earned Settlement Proposals and wider immigration reforms on women and girls, and victim-survivors of VAWG.** Through our work, we see first-hand the difficulties faced by some of the most vulnerable women in our society, and we are hopeful that your appointment and refreshed government provides an opportunity for change.

Your government has an important manifesto commitment to halve VAWG. These proposals will undermine such an ambition, instead handing perpetrators greater power to wield over victim-survivors, creating yet more barriers to safety and justice for migrant women, and increasing pressure on local authorities and specialist *by and for* VAWG organisations. The government's landmark VAWG strategy can only succeed if it is truly cross-governmental - and such policies enacted by the Home Office would instead reverse progress on this important mission.

Impact of the Earned Settlement Proposals on Victim-Survivors of VAWG

VAWG organisations have consistently raised the alarm at how wider immigration policies are preventing women and girls from seeking safety and putting them at greater risk of harm. Women with No Recourse to Public Funds (NRPF) are already three times more likely to be subjected to VAWG. Migrant

[1] https://hansard.parliament.uk/commons/2020-04-28/debates/AABF0D9C-D3BC-40C5-830A-52073E09ED35/DomesticAbuseBill

victim-survivors are prevented from accessing support and safety due to the hostile environment policies, and perpetrators often weaponise this to exert control over them. This is recognised in the Home Office's own domestic abuse statutory guidance. The Earned Settlement changes are likely to have a severe and disproportionate impact on victim-survivors of VAWG.

The proposals risk increasing long-term abuse, exploitation, poverty, destitution and criminalisation for women, whilst further restricting their access to safety and justice. This is directly at odds with the government's plan to halve VAWG and the commitment in the VAWG Strategy to improve the 'support offer and response to migrant victim-survivors of abuse'.

1. The **proposed extension of the settlement qualifying period** to a 10-year baseline, conditional on migrants 'earning' their settlement through various requirements, will mean migrant women are subjected to NRPF conditions for much longer periods than currently exist. Longer settlement routes for low-income earners will force migrant women into financial dependence on their partners, increasing vulnerability to economic abuse. This will deepen poverty and destitution for them and their children, in turn increasing their vulnerability to abuse and exploitation.

   Penalising victim-survivors for accessing public funds in this way will deter women from reporting and fleeing violence and abuse, trapping them in long-term harm and allowing perpetrators to abuse with complete impunity. These policies not only undermine the safety of women and girls, but actively increase the likelihood of VAWG.
2. The **requirements for settlement under the new four pillars model** will exclude many victim-survivors who have been isolated or subjected to coercive control over multiple aspects of their life, including their immigration status and finances. The requirement to have no criminal record under the 'character' pillar is of particular concern - we continually see women who are wrongly criminalised due to the abuse they suffer, including immigration breaches caused by abusers. Similarly, the requirement to have no debt at the point of settlement application creates new structural barriers for victim-survivors whose debt arises from abuse, financial control, medical care for abuse/violence-related injury or unpaid surcharges controlled by perpetrators. These proposals will unfairly and arbitrarily punish an already vulnerable group of victim-survivors through no fault of their own, preventing them from accessing the stability and support that settlement provides when they need it most.
3. Extending the time to settlement will increase the need for support from **already underfunded and overstretched specialist by-and-for organisations,** including greater demand for legal advice and expanded advocacy for increasingly complex cases. 67% of Black and minoritised migrant women express a preference for seeking support from specialist *by and for* services, and the changes to the Skilled Worker Visa salary thresholds in the Earned Settlement proposals pose an existential threat to these vital services, as many organisations simply cannot afford to meet the threshold for staff. This will mean that our ability to recruit and train staff with lived experience is directly at risk, jeopardising the vital, nuanced and specific support we provide to migrant women.

Recommendations

We urge your government to withdraw the Earned Settlement Model altogether. At the very least, we call on you to make the following revisions to the scheme to ensure victim-survivors of VAWG do not face further harm or be penalised as a result of their abuse.

1. **ILR Qualifying Conditions**
    - Keep access to ILR to a maximum 5-year baseline.
    - Oppose the extension of settlement qualifying conditions for victim-survivors of VAWG and exploitation, regardless of their visa status.
    - Remove access to public funds as a factor to increase ILR qualifying periods.
    - Introduce exemptions for criminal records in the 'character' requirements for victim-survivors of VAWG, including modern slavery and human trafficking.
    - Introduce exemptions for debt accrued as a result of abuse.
    - Reduce visa fees to only operational costs and eliminate the NHS surcharge.
2. **No Recourse to Public Funds (NRPF)**
    - Oppose the extension of NRPF until citizenship.
3. **End Deportations of Victim-Survivors**
    - End automatic deportations of victim-survivors with criminal records by introducing exceptions for those whose offending is the result of VAWG, including modern slavery and human trafficking.
4. **Specialist Frontline Services**
    - Introduce an exemption from salary thresholds for staff employed at *by and for* Black and minoritised migrant women specialist organisations.
    - Meaningfully consult *by and for* services on proposed changes and implementation.
5. **Safety Net for Victim-Survivors**
    - Keep existing protections for victim-survivors of VAWG, including modern slavery and trafficking. Extend the MVDAC and DVILR to all victim-survivors, regardless of immigration status.
    - Introduce a statutory firewall for migrant women experiencing VAWG, including modern slavery and trafficking.
    - Expand access to legal advice for victim-survivors by restoring immigration to civil legal aid and removing means-testing for survivors of domestic abuse and modern slavery.

If the government is to achieve its mission to halve VAWG in a decade, *all* victim-survivors must be supported and protected, regardless of their immigration status. As Prime Minister, you have an opportunity to build an immigration system that is both effective and humane, and ensure that women experiencing violence and exploitation will be protected.

We would welcome the opportunity to meet with you, the Home Secretary, the Safeguarding Minister, or another member of your wider ministerial team, to discuss the impact of these proposals for migrant victim-survivors at your earliest convenience. We look forward to working with your office as the government continues to implement the measures set out in the Freedom from Violence and Abuse cross-government strategy.

Yours sincerely,

Hibiscus

Latin American Women's Rights Service (LAWRS)

Southall Black Sisters

End Violence Against Women Coalition (EVAW)

This letter has been supported by over 50 organisations.