




Hibiscus

**UNSAFE,**

**INSECURE:**

**Barriers to safe housing for  
Black and minoritised migrant  
women and their children**

**EVIDENCE REPORT**



Published by  
Hibiscus Initiatives  
Resource for London,  
356 Holloway Road, London,  
N7 6PA, United Kingdom

First published 2024  
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Design: Prospectus

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## About Hibiscus Initiatives


Hibiscus Initiatives ('Hibiscus') is a national charity which has been delivering services to Black and minoritised migrant women in contact with the criminal justice system and immigration system for over thirty years. Hibiscus works with women in prison, in immigration detention and in the community. Many of Hibiscus' service users are victim/survivors of trafficking and violence against women and girls (VAWG).

## About this report












This evidence report forms part of Hibiscus' Safe Housing for Migrant Women project, funded by the Oak Foundation from 2023 to 2025, to improve housing outcomes for migrant women in contact with the criminal justice or immigration systems. It is intended to inform the implementation of reforms in law, policy and practice to overcome barriers to safe housing for migrant women and their children. The report draws on focus groups with Hibiscus' frontline practitioners and service users, data from our casework and desk-based research. Our recommendations arising from the report are set out in an accompanying policy briefing.

## Credits and acknowledgements

This report was written by Katy Swaine Williams and Michaela Melemendi. We would like to thank the practitioners who took part in focus groups and particularly the women with lived experience who contributed their experiences and insights. No real names have been included, to protect the identity of women and their children. This report would not have been possible without funding from the Oak Foundation.



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# INTRODUCTION

## About Hibiscus' work with Black and minoritised migrant women

Hibiscus delivers a holistic, trauma-informed service for Black and minoritised migrant women, including:

- Welfare, advice, advocacy and group work in prisons and in the community
- Reintegration assistance and practical and emotional support for women in detention and those released from immigration removal centres
- Community resettlement support on release from prison
- Identification of potential victim/survivors of trafficking and awareness-raising on the risks of being trafficked to the UK.

Through the Safe Housing for Migrant Women project, we aim to expand and enhance our service delivery and policy and advocacy work to improve housing outcomes for migrant women in contact with the criminal justice and immigration systems. This work is being delivered by a specialist housing project worker, a holistic through-the-gate keyworker and a policy lead, working with Hibiscus' frontline project workers and service users, and in collaboration with other expert organisations.

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## The problem we are trying to solve

There is a national shortage of safe and suitable housing, particularly for those on lower incomes, and insufficient safe, affordable accommodation focusing on the needs of women.

Due to a combination of 'hostile environment' policies including the NRPF condition, the illegal working offence and discriminatory 'right to rent' checks, migrant women are particularly likely to live in unsafe and overcrowded housing and have less access to safe and suitable housing. These policies put Black and minoritised migrant women in harm's way, making them more vulnerable to abuse, exploitation and criminalisation. Many of these women are single parents, with dependent children who directly experience the adverse effects of these policies.

There are particular barriers to safe and suitable accommodation for women in contact with the criminal justice system, who are likely to be facing multiple disadvantage. These include poverty and debt, experience of domestic abuse and other forms of VAWG, mental health needs and harmful substance use.

Contact with the criminal justice system, and particularly imprisonment, can exacerbate these problems, for example where imprisonment leads to the loss of an existing tenancy.

Migrant women who are victim/survivors of trafficking and other forms of VAWG face multiple and overlapping barriers to safe and suitable housing.<sup>1</sup> Black and minoritised migrant women experience the harms of racist systems, practices and attitudes and lack of an intersectional approach, leading to an institutional failure to meet their needs.

Where race, migrant status and gender intersect, women are impacted in particular ways by systemic and institutional discrimination. The women Hibiscus supports are also affected by the ways in which the criminal justice and immigration systems interact with each other. Many are not permitted to work; many have no access to public funds. Some are living in destitution, while others are struggling in unsafe or unsuitable accommodation, often with dependent children.

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1 [Hibiscus Initiatives \(2020\) Closed Doors: inequalities and injustices in appropriate and secure housing provision for female victims of trafficking who are seeking asylum](#)

# The women we support

The Black and minoritised migrant women we work with face multiple challenges which affect their access to safe and suitable housing.

**Women seeking asylum** face restrictions on the right to work and the No Recourse to Public Funds (NRPF) condition, with limited financial support from the Home Office for those facing destitution. Most have no choice but to live in Home Office asylum accommodation, either in hotels or in poor quality, overcrowded, shared housing.

Restricted access to public funds also affects other migrant women, including some with regularised immigration status. For example, women from the European Union with pre-settled status can only access public funds (including local authority housing support) if they have a continuous work history. This leaves those who are unable to work due to health or other reasons without access to support.

**Migrant women in contact with the criminal justice system** are effectively excluded from many of the measures which form part of the government's Female Offender Strategy aimed at reducing women's entry into the criminal justice system, reducing women's imprisonment, improving conditions in prison and improving resettlement outcomes post-release, including around housing.

**Women in immigration detention** are re-traumatised by the experience of indeterminate incarceration and likely to lose any source of income and potentially their home.<sup>2</sup> It is difficult for support services to work with these women effectively to prepare for release,

including applications for any benefits (where this is an option) and accommodation. Changes in detention powers brought in by the Illegal Migration Act 2023 add to concerns in this area. The threat of detention is a barrier to women seeking access to essential services, including domestic abuse support services and mental health services, and therefore puts them at greater risk of harm.

**Migrant women with multiple, complex needs** – many migrant women in contact with the criminal justice system and/or immigration system have multiple, complex needs as a result of past trauma including human trafficking, domestic servitude, domestic abuse and other forms of VAWG and exploitation. These women's recovery is hindered, and they may be re-traumatised, by contact with the immigration and criminal justice systems and associated problems including homelessness, poverty and debt; further exposure to VAWG and exploitation; institutional barriers, including failure to accommodate communication and cultural differences; stigmatisation and discriminatory treatment.

**Mothers and children** - many of Hibiscus' service users are single parents. It is known that 44% of children living in lone-parent families are in poverty. Single parents face a higher risk of poverty due to the lack of an additional earner, low rates of maintenance payments, gender inequality in employment and pay, and childcare costs. Children from 'Black and minority ethnic groups' are more likely to be in poverty: 48% are now in poverty, compared with 25% of children in white British families.<sup>3</sup>

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2 Hibiscus opposes the use of immigration detention.

3 Child Poverty Action Group website, accessed 05/08/2024. Available at: [https://cpag.org.uk/child-poverty/poverty-facts-and-figures?gclid=Cj0KCQiAj\\_CrBhD-ARIsAliMxT8DcXpf9n6F0EN9gqti--\\_3HO\\_ulQTNscfnGQ-JjsgVjKWWMiStaMaA-jhOEALw\\_wcB](https://cpag.org.uk/child-poverty/poverty-facts-and-figures?gclid=Cj0KCQiAj_CrBhD-ARIsAliMxT8DcXpf9n6F0EN9gqti--_3HO_ulQTNscfnGQ-JjsgVjKWWMiStaMaA-jhOEALw_wcB)

## What is 'safe and suitable' housing?

Through our discussions with the women we support and our frontline team, we have identified the following essential requirements for migrant women's housing to be safe and suitable:

- **Privacy and security** – affordable access to self-contained, women-only accommodation (not shared with strangers).
- **Location in their community** – avoiding long distances from school and other essential services.
- **Decent physical conditions** – clean accommodation in good repair, not overcrowded, and particularly not damp.
- **Gender-informed, trauma-informed and intersectional** accommodation provision (including supported housing), in terms of both the accommodation itself and the process for accessing it.
- **Reasonable adjustments** to accommodate disability.
- **Meets Probation and Immigration requirements** – accommodation meeting legal requirements is needed to avoid women being unnecessarily detained in prison or immigration detention due to a lack of suitable accommodation in the community.

## Problems with housing provision

Contrary to the above minimum requirements, our service users experience a range of problems with their housing, including:

- **No housing** – street homelessness or sofa surfing
- **Temporary housing**, subject to frequent moves at short notice, sometimes without seeing the property before agreeing to move
- **Shared housing** with inadequate space, privacy and facilities (including for families); not women-only
- **Poor quality housing** which is in disrepair (including damp, mould, dirt, infestations and strong smells)
- **Unsuitable housing** (due to physical or mental health needs and disabilities)
- **Overcrowding**
- **Unsafe location** - areas where service user feels unsafe or where the service user is at risk (e.g. returned to location where abuse/exploitation took place)
- **Distance from school** and support systems (such as specialist women's services, church and friends)
- **Inadequate move-on period** to leave Home Office-funded accommodation when women gain refugee status or discretionary leave to remain.

## Problems with the application process

When applying for housing, women and practitioners face procedural barriers including:

- Lack of trauma-informed, gender-informed and intersectional approaches in application process and amongst onsite staff
- Inaccessible application process, including complex legal and procedural framework, online application processes, 'gatekeeping' response and lack of access to legal aid solicitors
- Failure by state agencies to use available interpreting services
- Institutional barriers that fail to address language and cultural difference
- Stigmatisation and discrimination.

# The wider context

The current economic environment and housing crisis present challenges for anyone on a low income:

*“... in this country, if you're poor, it doesn't matter where you're from. It's horrible.”*

Hibiscus key worker

However, migrant women in contact with the criminal justice system or immigration control face additional challenges which require distinct consideration:

- Migrant women are particularly likely to be victim/survivors of modern slavery and human trafficking. While the Modern Slavery Act 2015 and its surrounding policy framework provides a degree of protection, provision is inadequate as shown in recent research reports by Hibiscus and others. Access to protection has been curtailed by provisions in the Nationality and Borders Act 2022 and Illegal Migration Act 2023.

- Addressing the needs of Black and minoritised migrant women requires an intersectional approach to address structural discrimination and failings related to gender, race, migrant status and socio-economic status.
- As can be seen in our casework data analysis below, migrant women subjected to marginalisation are disproportionately likely to have additional needs relating to mental health, and domestic abuse and other forms of VAWG.

Ensuring migrant women have safe and suitable housing requires reforms across all these areas. This should include abolishing the NRPF condition and, until this is done, implementing reforms to mitigate its impact as recommended by several organisations and stakeholders.<sup>4</sup> We summarise in the annex to this report the context of wide-ranging failings in immigration processes, housing and welfare provision, and recommendations that have already been made by other expert organisations to address this.

## Methodology

This report draws on our analysis of Hibiscus' casework data from April 2023 to March 2024, and discussions held throughout 2023 with Hibiscus' service users and frontline practitioners, exploring the following themes:

- What is 'safe and suitable' accommodation?
- What are the needs of the women Hibiscus supports?
- How does housing provision fall short of these needs?
- What are the barriers to 'safe and suitable' accommodation for migrant women?
- What needs to change?

We held three discussions with caseworkers from Hibiscus' prison, community, through-the-gate and international resettlement teams in January, May and September 2023, with at least eight practitioners taking part in each discussion. The groups considered some of the problems faced by migrant women seeking safe and suitable housing and the challenges they face in trying to support them.

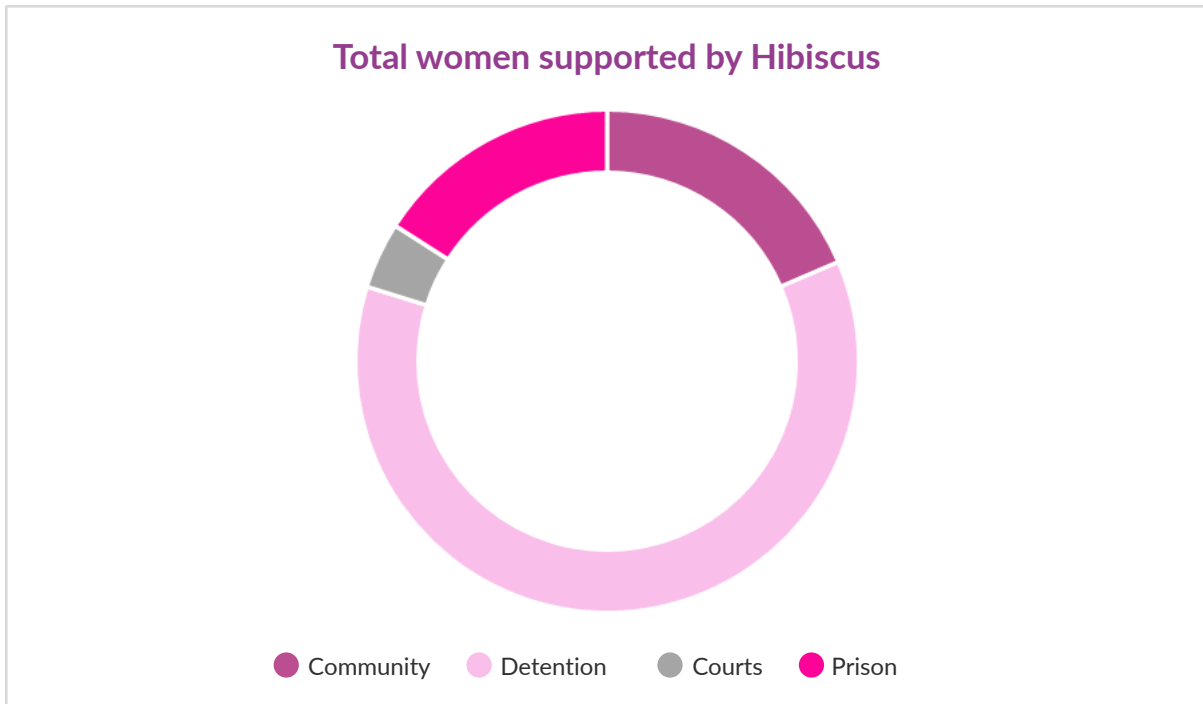
We held two discussions, in May and October 2023, with migrant women who have been supported by Hibiscus. Ten women took part in the first discussion and eight took part in the second. Some women took part in both discussions.

All names have been changed in the women's case studies, to protect their identity.

4 NRPF Network website, accessed 04/08/24. Available at: <https://www.nrpfnetwork.org.uk/information-and-resources/policy/summary-of-policy-recommendations>

# ANALYSIS OF OUR CASEWORK DATA, 2023 TO 2024

Analysis of our casework data from April 2023 to March 2024 gives an insight into the multiple needs experienced by our service users, particularly those who are identified with housing needs.



In this period, Hibiscus' project workers supported **960** women. Of these, **588** were supported in Immigration Removal Centres (IRCs), **178** were supported in the community, **41** were supported by the Courts Project and **153** were supported in prison.

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## Housing status of Hibiscus' service users in the community

Of the **178** women supported by Hibiscus in the community, **98** presented with housing needs.

Of these 98 women:

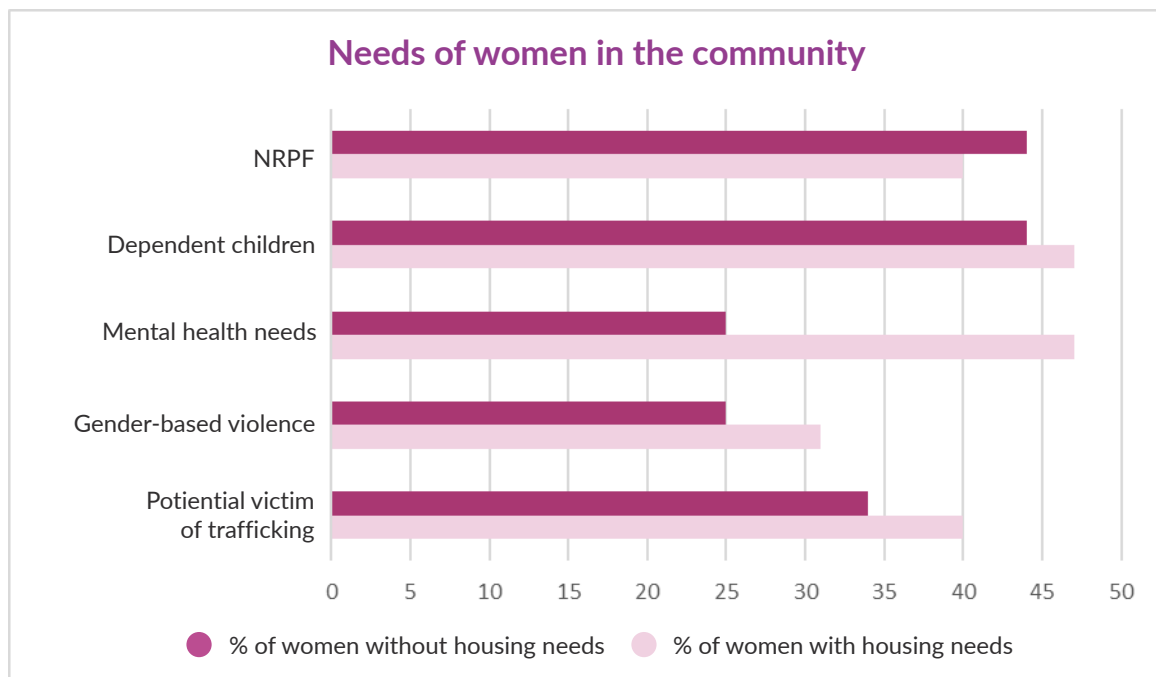
- **2** were being accommodated by a charity
- **14** were living in temporary/emergency accommodation provided by a local authority
- **7** were living in permanent accommodation provided by the local authority (social housing)
- **20** were living with friends and family
- **18** were living in NASS accommodation
- **11** were privately renting
- **5** were supported by NRPF teams/social services
- **5** were sofa surfing
- **2** were living in supported accommodation.



# Needs of Hibiscus' service users in the community

Of the same 98 women with housing needs:

- **46** women (47%) also had mental health needs (compared to 25% of our service users in the community without identified housing needs)
- **39** women (40%) were identified as victims of trafficking/modern slavery (compared to 34% of those without housing needs)
- **30** women (31%) had experienced domestic violence/VAWG (compared to 25% of those without housing needs)
- **46** women (47%) had dependent children (compared to 44% of those without housing needs).
- **40%** of women had NRPF (compared to 44% of those without housing needs)<sup>5</sup>



These data show the significant levels of need for all service users supported by Hibiscus in the community. Nearly half of the women have dependent children, who are directly affected by what their mother is experiencing. The data indicate that service users with housing needs are significantly more likely than others also to have mental health needs, and somewhat more likely to have needs relating to trafficking/modern slavery and domestic abuse and other forms of VAWG.

This reflects research showing the links between homelessness and insecure housing and the multiple disadvantage which can both lead to women's homelessness and be caused by it.<sup>6</sup> It is also an indication of the need for accommodation provision – and the process by which it is accessed – to take account of the multiple, complex needs that many women have.

<sup>5</sup> These figures are based on service users' immigration status at the end of the reporting period. Some service users began the reporting period with NRPF but received status and recourse to public funds by the end of the period. This will include women who received refugee status and then faced the housing needs that follow eviction from Home Office accommodation and navigating housing/homelessness applications.

<sup>6</sup> [Solace Women's Aid & Connection at St Martin's \(2022\) A Strategy for Ending Women's Homelessness in London: Evidence Report and Guidance](#), p4

### Further needs of many of the women include:

- Physical health needs (both generally and resulting from disrepair in accommodation)
- Poverty/destitution arising from low wages, low rates of asylum support payments, problems with benefits (such as gaps/renewals/errors) or lack of access to statutory support if NRPF
- Experience of barriers rooted in patriarchy such as denial of services in community languages and failure to respond effectively to cultural distinctions
- Limited access to women-only specialists and 'by and for' provision
- Lack of access to legal aid solicitors.

Being subject to immigration control and experiencing insecure housing – including temporary housing, shared housing and poor quality housing – is highly stressful and hinders women's recovery from trauma. The experience of the immigration process, including immigration detention, is often in itself traumatising as one woman pointed out:

*“They took me to the deportation camp [IRC], this caused mental issues that continue up until now.”*

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# INSIGHTS FROM WOMEN AND FRONTLINE WORKERS

Hibiscus' practitioners and service users identified particular needs that commonly arise for migrant women, which must be taken into account in order to ensure accommodation is safe and suitable. It was acknowledged that expectations for accommodation must be subject to realistic limitations, but that it should be possible to meet certain basic standards. Some of these would be a requirement for anyone seeking accommodation, while others are particularly needed for this service user group.

One of the overriding additional factors faced by the women Hibiscus supports is the fact that many of these women are in recovery from trauma, and are often continuing to experience trauma. This means that uncertainty around temporary accommodation and frequent moves is particularly difficult to cope with, as is sharing accommodation with strangers (including men) and having to interact on a daily basis with staff (including male staff) who are not trained in taking a trauma-informed, gender-informed and intersectional approach. For women with children, there is additional concern about the impact of unsafe and unsuitable accommodation on their children's wellbeing, and significant stress caused to the women in trying to mitigate against negative impacts on their children.

## **If you could change one thing, what would it be?**

*“The right to work...Before I was in this [immigration] trouble, I was working and paying rent.”*

*“Accommodation in good repair – especially not damp.”*

*“No one should be forced to be in shared accommodation.”*

*“More organisations to help you get a safe place much quicker.”*

Women supported by Hibiscus

Through these discussions we identified five barriers to safe and suitable housing for migrant women and their children.

## **1. The ‘hostile environment’ policy**

Hibiscus' service users are severely impacted by the ‘hostile environment’ policy, which restricts the rights of those with insecure immigration status to work, rent, access health services and claim benefits. Many women Hibiscus works with are living in destitution. Migrant women who leave prison and IRCs are likely to become homeless. The cost-of-living crisis exacerbates poverty amongst migrant women. In addition to these severe challenges, migrant women face structural and procedural barriers to accessing and maintaining safe and suitable housing, including:

- Lack of trauma-informed, gender-informed and intersectional approaches in application processes and amongst onsite staff, including lack of knowledge and understanding of VAWG and associated risks and impacts
- Inaccessible application processes, including complex legal and procedural frameworks, online application processes, ‘gatekeeping’ responses and lack of access to legal aid solicitors
- Failure by state agencies to use available interpreting services
- Stigmatisation, discrimination and failure to accommodate cultural differences
- Lack of training and awareness amongst housing officers of immigration legislation, NRPF and VAWG.

## NRPF condition and restrictions on the right to work and the right to rent

Women and practitioners identified the NRPF condition, and restrictions on the right to work and the right to rent as major barriers to accessing safe and suitable housing, with one woman commenting:

*“If visa says NRPF it makes it a lot more difficult to find something suitable.”*

A practitioner commented:

*“A lot of our service users have no recourse and that makes it difficult.”*

Women who are subject to the NRPF condition cannot work and are ineligible for social housing, some shelters, refuges and supported housing. Some women may receive financial support payments or support with accommodation if they are eligible for support under Section 17 of the Children Act 1989 (due to dependent children) or Section 8(1) of the Care Act 2014 (due to their own safeguarding needs).

In order to be secure in their own accommodation, women need to be able to afford to pay for it on a sustainable basis, preferably independently. This reduces women's vulnerability to abuse and exploitation, including the exchange of sexual relations for accommodation ('sex for rent').<sup>7</sup> Ensuring accommodation is affordable for migrant women would enable them to be independent, covering their own housing costs wherever possible, reducing their vulnerability to abuse and exploitation, and promoting wellbeing for them and their children.

Many of the women Hibiscus supports wish to be allowed to work so that they can pay for their own accommodation and be as independent as possible from the state:

*“If they want to save money, let them give us the right to work!”*

Woman supported by Hibiscus

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## Difficulties accessing education, training and safe and suitable employment

Some of the women Hibiscus supports *do* have the right to work and are either working or trying to find work. One woman explained that she is doing a foundation course in social science at university and aims to do social work. Another woman, with three children of her own, is a support worker in a residential home for children with mental health needs and learning disabilities, working three night shifts a week. A third woman is looking for an administrative role. However, it is often still difficult for women to get into training and employment. One woman explained:

*“I worked as a nurse before. I want to do this again but you need £1200 to get back into it.”*

Barriers to working can also arise due to delays in providing documentation, as another woman explained:

*“I now have a work permit but no ID card so I can't get my national insurance number to work.”*

### Asylum seekers – permission to work

Asylum seekers may apply for permission to work if they have not received an initial decision on their claim within 12 months, provided the delay was through no fault of the applicant and subject to certain parameters, including the Home Office's Shortage Occupation List. Where permission to work is granted, this will only be valid until the claim has been determined and any appeal rights are exhausted.<sup>8</sup>

Applying for permission to work requires careful consideration as this might affect the individual's eligibility for National Asylum Support Service (NASS) accommodation and it may take some time to earn enough money to fund a deposit for private rented accommodation. Jobs on the Shortage Occupation List are often low paid, and may be enough to lift someone out of destitution but not enough to afford private rented accommodation.

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7 See also: [Beyond the Streets \(2023\) Excerpt from: Exchange of Sexual Relations for Accommodation \('Sex-for-Rent'\): Call for Evidence submission June 2023](#)

8 Part 11B of the Immigration Rules, explained in [HM Government \(2023\) Guidance: Permission to work and volunteering for asylum seekers \(accessible\) \(updated April 2024\)](#)

## Private rent is unaffordable even with welfare benefits

Even for those who receive welfare benefits and are permitted to rent, private rents are often too high to be affordable. One practitioner supporting a woman receiving universal credit was told by a private rental agency that she would need to be earning £45,000 per year to be taken on.

### Indy\*

Indy was in private rented accommodation and wanted to move. She had been really proactive, looking on Rightmove and trying to find somewhere that was affordable for her. The council had said they would pay her deposit, but refused to do this before she moved in. The landlord said she couldn't move in until the deposit had been paid. The Hibiscus practitioner was going back and forth between the two agencies trying to reach a solution.

\*Name has been changed to protect the woman's identity.

## Inaccessible application processes

Online application processes and lack of face-to-face contact make applications inaccessible for many women, as one practitioner explained:

*“Before, when someone was homeless you could go to the council and declare yourself as homeless. Now... often it is done online...”*

Practitioners noted the challenges arising from the move to online or telephone applications:

*“Just recently I have a service user who is a single mum of six children and she has s21 eviction, but when we tried to approach last Friday to [local authority] homeless unit which has practically disappeared, there is a phone number you have to use. You are not even having a proper interview. You can't do the application online from inside, which is very difficult for people.”*

There was a discussion amongst the women about the difficulties faced by homeless people in using online application processes, including the Jigsaw online application:

*“No one helps you fill this in online. We need to know what this Jigsaw puzzle is. We don't know how to use it.”*

Some women felt that failures to assess their needs meant they were not offered appropriate accommodation:

*“They are not assessing my problems, not providing appropriate facilities.”*

## Complicated legal and procedural framework, 'gatekeeping' approach and lack of legal aid

The complicated legal and procedural framework, coupled with an apparent lack of understanding or refusal to fulfil legal obligations on the part of some local authority housing officers, leads to delays, many hours of work by frontline practitioners, and the costs of involving solicitors. The impact of this 'gatekeeping' approach is compounded by lack of access to legal aid. Two practitioners described how challenging it can therefore be to support migrant women with their housing needs:

*“Housing on the community team was the one thing I dreaded having to deal with. There was no single rule. It was extremely confusing to navigate.”*

*“Housing issues stressed me out big time. Often there were solutions but they took a long time to find.”*

Adding to this, the complexity of the immigration system makes housing particularly challenging, not only for asylum seekers but also other groups such as EU nationals with or without pre-settled status. As one practitioner explained:

*“Even with [pre-settled status] you are not eligible for mainstream housing support from local authorities, or benefits unless you can pass particular tests.”*

## Inconsistent approaches by local authorities

Inconsistencies in the approach taken by different local authorities create additional challenges, as one practitioner explained:

*“There is inconsistency in how local authorities deal with me – how quickly they reply etc.”*

### Nadia\*

Nadia has severe Post-Traumatic Stress Disorder. The council wanted five years of address history from her. She had a positive Conclusive Grounds decision [confirmation that she is a victim of trafficking and therefore entitled to support], but the council would not accept this as a reason why she would not have five years of address history. They also refused to pre-book an interpreter for her prevention appointment and said, ‘If it seems like we need one on Friday, we’ll have to rebook the session with an interpreter.’ This made no sense as the practitioner was asking for one in advance.

\*Name has been changed to protect the woman’s identity.

Last minute responses to a housing need cause significant stress to families and those trying to support them, and eat up hours of staff time, as two practitioners explained:

*“When someone was homeless or going to become homeless, that was really stressful. For example someone has been granted refugee status and gets an eviction notice from the NASS accommodation, dealing with the council at that stage is also difficult. You contact them in advance, but they always wait until the last minute to find a solution and put a lot of stress on the service user and on ourselves. I’ve been dealing with the council after working hours on the day of the eviction, and then suddenly the out of hours team will provide emergency accommodation. Why, after we have been in touch for ten days? That is so stressful. If there is something that can help to make that process easier...”*

*“When we find women who are homeless it’s one of the toughest things, because there is not much you can do; you rely on shelters but sometimes they aren’t open, only in the winter, or they are at capacity. Housing is a really stressful area.”*

## Who is going to pay?

Problems can arise over who will pay for accommodation for women who have NRPF. For example, victim/survivors of domestic abuse might get placed in refuge or emergency accommodation and the local authority might try to shift responsibility to another local authority, or say that social services need to pay, or vice versa.

### Gloria\*

Gloria had severe mental health issues and was at risk of domestic abuse; her address kept moving between boroughs as she needed to move to stay safe. Her mental health support was also getting transferred between boroughs as they kept saying the new borough she was living in was responsible. The support was continually disrupted, and Gloria had to keep starting over.

\*Name has been changed to protect the woman’s identity.

One service user supported by Hibiscus had been housed under the Mental Health Act. She was involved in a fight and was arrested. The accommodation was only paid for three days, and she was told she had to leave because no one would pay. Eventually another solution was found, but this was highly stressful for her. This kind of situation can also arise for women who have NRPF, who may be offered emergency accommodation for a short period, but when the council or other provider realises that they are NRPF they might not pay for this to continue, or will argue about who needs to pay. Some cases are passed back and forth between local authorities. There can be a lack of communication between boroughs, with one borough expecting another to deal with the case, even where there is a risk of domestic abuse.

## Local connection and intentional homelessness

Some practitioners noted that local connection and intentional homelessness remain significant barriers to housing. Some local authorities house women a long way out of borough, where women are isolated and end up leaving their accommodation. The authority may then view this as intentional homelessness without considering the wider context. In other cases, local authorities may refuse to accept referrals due to a lack of local connection even where they are at risk of abuse or exploitation, as in the following case reported by a caseworker, involving a trafficking victim:

*“The Council usually try to send the service user in the area where they have longer connection. I had a service user who was living in [a borough in Northern England]. [Name of local authority] was supporting her, providing accommodation. One day she saw her trafficker. She escaped to [a London local authority] to stay with a friend. The friend told her she had to leave because her child was noisy and people were complaining.*

*“I referred her to [the same London local authority housing department]. They took all the evidence but didn’t consider all that and they have referred her to [the original borough in Northern England], which immediately accepted to take her back. She was screaming, she was crying. She didn’t want to go.*

*“I find it a barrier – how to fight with them, the reason why the place she has stayed for longer cannot be suitable all the time. Again I had to involve a solicitor. The service user has now been placed in London.”*

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## Lack of legal aid

Hibiscus’ casework team frequently needs to call on solicitors (such as Lawstop, Edwards, Osborne Law and Duncan Lewis). Following cuts to legal aid, it is very difficult to find housing solicitors when needed to challenge housing decisions or suitability of accommodation, as two practitioners explained:

*“Challenging decisions when housing comes to an end is difficult.”*

*“Finding a solicitor to do that work is really hard. I always end up using the same solicitor from Lawstop. Even when you’re accepted by the council, you’ll have families of five put in one room / disabled person on the first floor. Without a solicitor you’ve no hope.”*

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## Failure to use interpreting services

Failures by state agencies to use the interpreting services that are available to them cause delays and distress, as these two practitioners working in the community explained:

*“A big one as well is language. Most of the time councils and others will speak to the keyworker in English rather than communicating directly with the service user with an interpreter, so they are completely left out of the discussion about their own life.”*

*“No matter how many times you tell the council to provide an interpreter, they don’t do it. They say, ‘You need to learn English.’ So you and the council do the assessment as best you can and fill them in afterwards with an interpreter. You have to do it on the day as they will be homeless on the next day.”*

A practitioner supporting women in immigration detention explained how she felt she had to intervene to ensure women were able to communicate, even though staff in the detention centre should be using interpreting facilities themselves without her involvement:

*“All staff in IRC have access to Big Word and can call it any time and I don’t think I’ve ever seen an officer use it. They will just speak English more loudly.*

*“Yesterday there was a woman crying at the desk – she needed access to get her SIM card to speak to her sister because she had been detained. I offered to speak to her with Big Word.... Sometimes they [immigration detention staff] use Google translate but mostly it’s just a guessing game.”*

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## Stigmatisation, discrimination and failure to accommodate cultural difference

Stigmatisation of migrants, racism and sexism, and failure to accommodate cultural differences, exacerbate all the above. One practitioner commented:

*“In our current mainstream media, it’s quite hostile to migrants – saying they are invading and taking up spaces in our accommodation. It makes me wonder whether some of those attitudes affect how people at the council think of our service users or communicate with our service users. They’re not exempt from external influence. Racism is real and does it play a part in why the system is so hard for migrant women?”*

Practitioners noted the stigma faced by their service users, with one explaining:

*“Now it is so difficult and there is a lot of stigma especially for people from different ethnicity.”*

This includes racism, in this case reported by a practitioner working with a Roma woman:

*“We approached ... a few agencies, asking if there is a possibility to rent. They said you have to earn £60,000. Who has this to rent a 3-bed house? This woman has universal credit. I could have seen that all the doors were getting closed when we went inside also because of her appearance. She is a Roma woman, very traditional dress. ‘We don’t have anything available,’ before we even asked.”*

Three practitioners described how the system itself feels discriminatory:

*“The whole reason women are in these situations is because they are discriminated against by the system.”*

*“It’s not so much outward use of racist language but systemic.”*

*“Landlords aren’t going to say, ‘I don’t want migrant service users.’ We might know it to be true but I’ve not experienced that sort of brazen discrimination.”*

## 2. Reliance on poor quality, shared accommodation

### Shared accommodation

Women supported by Hibiscus felt strongly that no one should be forced to share accommodation with strangers. This was particularly important for women recovering from trauma and those with dependent children. In particular, women and children should not be required to share accommodation with men. One practitioner commented:

*“Waiting on a waiting list for mental health support and then going through counselling etc, when you go home you need your own space. They can’t expect you to recover from trauma when you’re sharing a space with someone else who may also have experienced trauma.”*

Where women do have to share accommodation, it is important for this to be women-only and to have agreed ground rules, such as on visitors and cleaning. One woman described Home Office accommodation in which she had to share with a woman who was bringing men back to the house, which made her feel unsafe. Some women were distressed by strangers using their personal items (food, pots/pans, toiletries etc.).

#### Ruby\*

Ruby was living in NASS accommodation. She was a victim of torture, domestic abuse and trafficking. She was placed in a shared room with another family (which included a man). After a few days her Hibiscus case-worker was able to have her moved to a single room, but it smelled like a dead body.

\*Name has been changed to protect the woman’s identity.

Shared housing is particularly unsuitable for women with dependent children. Some women explained they had accommodation in very small rooms, with insufficient space for their children. Some did not have appropriate facilities, such as no washing machine, broken cabinets and an overgrown garden. In a shared house where electricity needed topping up, other residents were making people with children pay more, as one woman explained:

*“People are being difficult when you have children, they think that the responsibility will be on your head because you have children. So you should be the one paying a lot of money. So I know that a lot of family are going through the same thing. It’s a big problem. Some people can’t afford it.”*

Some women complained that their landlord said the rent was all-inclusive but did not pay the top-up, so that residents ended up having to do it. One woman explained:

*“We pay them [landlords] money but they find it difficult to do repair and they collect huge amount of money... Sometimes we stay in a cold house because when you live in a shared house, no one wants to be wasting money.”*

The women emphasised the importance of having their own front door with a lock, and to have their privacy respected by housing officers and other staff visiting the property.

*“Security – just to be safe. To be stable accommodation. The main door locked. This shared accommodation that I’m in right now. Some people come out and leave the front door unlocked. I have complained. God forbid anything could happen. I’ve got two young daughters living with me.”*

Woman supported by Hibiscus



## Located in their community

It was important for the women that their accommodation should be located within reach of their community and support networks, including essential services such as school and health services, appointments with Probation and Immigration, women's specialist services, and their personal support network such as friends or church. The suitability of the location was also affected by whether women felt safe in the local area. A caseworker explained:

*“Safety is one of the most important elements. I've got a service user who has been living in one borough since she arrived. She has a community in that area – she's got friends. Because of all these housing problems [this service user's child had developed asthma], she has to take child to hospital twice a month. Her friends support her in different ways. Moving service users to a different area is disconnecting them from that community and making them feel scared because it is a new area where they may feel unsafe. It may be safe, but how they perceive is such a big issue for them.”*

Practitioners also noted the importance of proximity to local services, as one explained:

*“Access to any services that people are engaged with already – proximity and accessibility to them, and to community support such as friends and other community. Some service users are very involved with churches, so being able to access them would be really important.”*

Another practitioner commented:

*“Similarly to that, I've had service users moved to areas that were totally unsuitable... for example I had*

*a lady who was Pakistani and was a single mother. She was placed in an area which was largely that culture [Pakistani]. She was discriminated against because it's not accepted – so an awareness of that. You could integrate into a different area of town quite easily but your own culture won't accept you.”*

For service users who are recovering from trauma, being able to continue accessing services where they had built relationships was particularly important, as one practitioner explained:

*“Service users who are traumatised, they already have rapport with professionals such as psychotherapists and doctors. Connecting with other professionals and building a new rapport may be really retraumatising for them.”*

One woman spoke of her distress at the prospect of being moved a long way away while she waited for a place in a safe house:

*“They tried to move me to Manchester, my mental issues were made worse. They wanted to move me away from everything and everyone that I knew. And I had to fight and got ill and I couldn't even stand on my feet and all that. So, it's been affecting my mental health... They made me an offer to stay in a hotel in Ilford before I was moved to a safe house. You can't forget those experiences; it's staying in my head. You can't do anything, you feel like you're trapped, you don't know what's next... And are you going to get an accommodation in a safe house here or are you going to go outside? And now I'm staying in the safe house and I'm rebuilding myself.”*

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## Temporary accommodation and frequent moves

Facing frequent moves, often at short notice, is highly stressful for migrant women recovering from trauma and/or living with insecure immigration status, as one woman explained:

*“The unknown/uncertainty is the worst part of feeling like you're in an unsafe and temporary situation.”*

This is made worse by restrictions on the amount of belongings women are allowed to take with them, being moved to locations where they are uprooted from their community and support networks, and being forced to agree to moves at short notice without seeing the property. This is particularly difficult for women with children, as one woman explained:

*“I don't know what to tell my son about the current situation, he's not eating at school – I just look for something to distract him.”*

Several women had been asked to agree to move into new accommodation without seeing it first, in some cases through an online process without even seeing someone face to face. One woman explained:

*“If I don't sign, they take me to shared accommodation again.”*

The women explained that when you are asked to move, you are only allowed two pieces of luggage. This is particularly difficult for women with children, as they have their own things, including toys and other valued belongings. The women said they were told to give their things away to charity. One explained:

*“I lost so much.”*

A woman asylum seeker explained that she had been told she had too many belongings, without accounting for the fact that this included clothes and toys for her children.

## Inadequate move-on periods and delays in processing applications

One woman described the impact on her and her young son when the council waited until the day of her eviction from Home Office accommodation before they provided her with temporary accommodation, although the eviction letter had been provided to them months earlier:

*“The lady was just pretending that she wasn’t aware of which I sent her an email, I even screenshot it, called her and she knew the date; they waited in the last date. I was begging the house manager to allow me to stay there for the weekend but he couldn’t let us.*

*“The council ended up sending us to the out of hours team who eventually found us something, but then they didn’t have the key. Me and my son waited for 4 hours in the cold for them to sort it out – it was frustrating, I cried. Too many things were going on and happening in that moment. I couldn’t express how I feel. I didn’t know what to say to my son, it was already past 10 at night and we were out in the cold. You don’t have words to say, no words could come out of your mouth to say.”*

### Meena\*

Meena was living in NASS accommodation and got her leave to remain. She hadn’t received her eviction letter from the Home Office and was placed in a dirty hotel room with damp. Contacting the Home Office was impossible. Eventually her Hibiscus case-worker had to involve the local authority safeguarding team who agreed that the conditions were terrible, but said they couldn’t do anything because it was the Home Office who was managing the accommodation. The eviction letter didn’t come for two months, at which point the service user could be moved on and helped by the council.

\*Name has been changed to protect the woman’s identity.

Another woman described her experience of eviction:

*“The stress of the bailiffs was very difficult, and the children were asking if they would have somewhere to live when they came back from school. I didn’t know what to say to them. My children were outside waiting for the van to take them, late at night. We were still there up until past 11:00.”*

Inadequate move-on periods were exacerbated in the summer of 2023 by a new Home Office practice under which asylum seekers who gain refugee status received only 7-10 days’ notice to leave their Home Office-funded accommodation. Following a campaign by Hibiscus and other organisations supporting refugees with housing needs, and concerns raised by local authorities, the policy was eventually dropped by the government in December 2023.<sup>9</sup> Hibiscus’ service users were directly affected by this change as illustrated in the case studies below.<sup>10</sup> Move-on periods remain too short and should be extended to at least 56 days. The women Hibiscus supports have pointed out the need for agencies to communicate more effectively with each other so that work can be done to ensure there is no gap in accommodation, with one commenting:

*“It’s for the agencies to liaise, not to put it on the woman.”*

Another woman pointed out:

*“But we get 56 days from the council.”*

9 [The Guardian, ‘Home Office reverses policy on UK hostel evictions after surge in refugee homelessness’, 21 December 2023](#)  
10 [see also: Inside Housing, ‘The new seven-day notice-to-quit policy puts migrant women at even greater risk’, Ghadah Alnas-seri, 3 October 2023](#)

## Women affected by the 7-day move on policy

### Adeela\*

Adeela lived in NASS accommodation with her partner and their two children, who were in primary school. In August, they had been refused asylum but were granted permission to stay in the UK on the basis of their Article 8 (ECHR) right to family life.

Adeela immediately approached her local council to start a homelessness application, but they said that they would not be able to proceed until she received an eviction notice. Her asylum support provider was not able to provide documentation about her imminent eviction until it was formally confirmed by the Home Office.

Adeela's family was stuck in limbo: there was nothing she could do to prepare for their imminent eviction. In the meantime, Adeela's children had already started the school term. Adeela said:

*“This has had a negative impact on my children. I've had to buy their uniforms, but I don't know when and where they will be transferred to once we're homeless. My son asks me how long he will be able to stay with his friends, but I just don't know.”*

### Alma\*

Alma was a trafficking victim and an asylum seeker. She had three children; the youngest was four months old, underweight and undergoing medical assessment. Three months previously Alma had been granted discretionary leave to remain in the UK for one year. Although she had not received refugee status (her claim was still being processed), this meant that she was no longer entitled to stay in NASS accommodation. She had recently received an eviction notice giving her 7 days to leave her accommodation.

Alma's Hibiscus project worker contacted the local authority where she lived, who accommodated the family in a hotel for a week, with nothing except a bed and TV, not even a refrigerator. Alma had to buy bottles of milk to feed her child; once the bottles were opened, if not finished, she had to throw them away.

The family were then moved to a shared house. The conditions were very bad. Their room was smelly, the mattresses and carpets were dirty and there were mice in the room. The mice had been eating their food, especially the children's cereals. The children had developed skin rashes and had been seen by the health visitor who was due to make a report to the housing department. The teacher of Alma's oldest child had asked Alma to seek medical advice in case her child's skin condition was contagious. The situation was causing significant stress to the whole family; Alma was already on anti-depressants.

Alma had not been told when she would be given suitable accommodation, but her key worker had been told that clients are not usually moved from emergency accommodation for at least six weeks. Alma added:

*“The conditions that my children and I have been living since we have been evicted from NASS have affected my mental and physical wellbeing. While I was in hotel for one week, I had no fridge to store my baby's milk, I had to wash baby's clothes and others in the sink by hand. There was nothing to hang the wet clothes to dry apart from a single chair. The hotel was not suitable for me and my family even for a single day.*

*“After a week I was moved to a room of a shared house, again a very dirty room, and no baby cot. and I am sharing a bathroom and toilet with six other families. I have no idea how long I will be kept here.”*

## Women affected by the 7-day move on policy (continued)

### Tiia\*

Tiia received refugee status in summer 2023 and her Biometric Residence Permit (BRP) letter shortly afterwards. She was then evicted from her Home Office accommodation with 10 days' notice. Her Hibiscus project worker contacted the council who said they would assess her claim in October. They then agreed to speak to her in September but she was assessed as not in priority need and became at high risk of street homelessness.

Fortunately, someone at Tiia's church agreed to provide her with a room while she waited for her benefits claim to be approved so that she could move into private rented accommodation.

Even though Tiia was extremely proactive and applied for benefits as soon as she received her BRP, she did not receive her first payment until mid-September. With the abrupt termination of her NASS support (both accommodation and financial) and the council not offering a housing assessment until well after her eviction date, there was a high chance that Tiia would have ended up rough sleeping if she hadn't been able to find someone to stay with. Tiia's project worker commented:

*“This experience has been extremely difficult for Tiia, who had hoped that once she received her status she would be supported to re-establish her life in the UK, but instead feels like she was tossed aside and left to fend for herself.”*

\*Names have been changed to protect the women's identity.

## Disrepair, overcrowding and health and safety

Accommodation that is clean and in good repair – particularly that is not damp – was of key importance to the women.

### Rosa\*

Rosa was placed in temporary accommodation, which was a one-bed flat with terrible damp. Her child developed asthma. There was also a rat in the property that she saw next to her child while they were sleeping. The housing officer was not helpful and concluded that the property was suitable. The practitioner had to gather medical supporting evidence, including from the GP, and enlist the support of a welfare solicitor. Eventually Rosa was moved.

\*Name has been changed to protect the woman's identity.

Some women spoke about landlords failing to do repairs.

## Regulation of accommodation standards

The Houses in Multiple Occupation (Asylum-Seeker Accommodation) (England) Regulations 2023 (the 'Regulations') sought to exempt landlords of Houses in Multiple Occupation (HMOs) from the usual health and safety framework.<sup>11</sup> According to the then government, the Regulations were intended to reduce the number of asylum seekers living in hotels. However, the women we spoke to felt strongly that asylum seekers' accommodation should be entitled to the same standard of regulation as anyone else's housing.

Opposing the new regulations, Hibiscus argued that improving asylum seekers' accommodation and making it sustainable requires investment and better regulation, not less regulation. Ignoring concerns raised by Hibiscus and others that removing these licensing requirements would put an already vulnerable group at greater risk of poor and unsafe housing conditions, comprising another way in which asylum seekers and migrants more generally are treated as 'second class' residents in this country and denied their basic rights, the then government went ahead with the plans.

11 [Hansard Vol 830, Col. 30GC, 16 May 2023](#)

12 [Chartered Institute for Housing, 'Government withdraws draft regulations removing HMO regulation from asylum seekers accommodation the day before trial', 8 February 2024](#)

13 [The Guardian, 'Asylum accommodation to be excluded from social housing landlords crackdown', Diane Taylor, 15 January 2024](#)

14 [Hibiscus Initiatives \(2020\) Closed Doors: inequalities and injustices in appropriate and secure housing provision for female victims of trafficking who are seeking asylum, p28](#)

One practitioner noted how challenging this can be:

*“For service users in NASS accommodation, when it is in a really bad condition, what can we do about that?”*

Several of the women complained of living in overcrowded and cramped conditions. In one case, a woman was living in a studio flat with her two children, without enough space to live a normal life. She commented:

*“If you have problem with papers, it can delay everything... You can see that this woman is sleeping with these two children in one bed. Two boys in a bed that is so small, like this one will move, like you find yourself on the floor, you understand? And you are the one telling me that I live in a 'well-furnished house' and that I don't need help... When you don't have papers, they don't want to provide.”*

Another woman commented on overcrowding and lack of space:

*“Make sure the rooms are liveable – space. The rooms are like a little box. There are radiators, like toy radiators that don't bring no heat.”*

However, the Regulations have since been withdrawn in response to legal proceedings by eight asylum seekers.<sup>12</sup>

Despite this climb-down by the government, it is deeply worrying to see its 'two-tier' approach repeated in the exclusion of asylum seekers from new plans to crack down on irresponsible social landlords through Awaab's Law.<sup>13</sup> The new government risks further tragedy unless it takes action to address this significant gap in protection for vulnerable asylum seeking families.

Hibiscus has supported numerous women whose asylum accommodation was in poor condition, including where there were missing or faulty facilities, major leakages, rat infestations or broken windows. Housing managers in these cases took a long time to arrange repairs and, in some cases, did not take action at all. In one case reported to Hibiscus, a woman was housed in accommodation infested by cockroaches and both she and her baby got skin rashes as a result.<sup>14</sup>

## Adequate space and facilities

One woman described her struggles in temporary accommodation with her young son:

*“I was placed in February in accommodation (Travelodge Hotel). There is no fridge, microwave or any kitchen facilities. The housing officer is lying about trying to contact me, saying that she called me but she never did...”*

*“I have to buy all my food outside, which is unhealthy and expensive. I don’t have enough money to buy the actual things I need. They are moving us to another hotel for 6 days, and then back to where we are now. It is very frustrating and I don’t know how to explain how I feel. I can’t buy and keep any food, I can’t cook, I can’t wash my clothes. I can’t keep my son in one place, and he is struggling.”*

*“The hotel told me that I need to keep him from jumping and running around. After so long in this situation, I told him to jump and do whatever he wants, I don’t care.”*

*“Nothing is being done by the council and there are no updates for me. My son is used to my cooking and eating at home; the school is complaining that he’s not eating at school. I’m buying food only to throw it away as I don’t have anywhere to keep it. We have to travel 1 hour each way to get to school. I’ve asked the school for a letter to send to the council to see if that will help but they haven’t given me this.”*

Another woman commented that she had been in a similar situation, “The council moving me to a Travelodge with kids,” where it was impossible to cook or have enough space. She added:

*“It also causes emotional stress, the kids aren’t able to see their friends as we can’t have people over to visit. It affects our social life as well.”*

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## Reasonable adjustments to accommodate disability

It is a legal requirement for accommodation to meet reasonable requirements to accommodate disability. For women and children with any physical disabilities or particular health needs, it was noted that it was essential for these to be taken into account, such as providing accommodation with step-free access for wheelchair users.

However, some women discussed physical health issues that had not been taken into account in their housing allocation, including one woman who was placed in Home Office accommodation without step-

free access for her disabled child who is a wheelchair user, with implications on the health and wellbeing of both mother and child.

Women talked about the stress caused by unsuitable accommodation. Some women complained of the Home Office ignoring their health needs and placing them in unsuitable accommodation, such as a woman with arthritis who was placed in accommodation with steps and no lift.

### 3. Lack of a gender-informed, trauma-responsive and intersectional approach

#### Ending women's homelessness

As the Strategy for Ending Women's Homelessness in London<sup>15</sup> and the Women's Pan-London Rough Sleeping Census make clear<sup>16</sup>, tackling women's homelessness requires a comprehensive, gender-informed approach and an intersectional understanding of women's homelessness which must include support for women with NRPf and complex immigration status. The strategy emphasises the need for safe, suitable and specialist single-sex accommodation and wrap-around, multi-agency, trauma-informed support, as well as second-stage and move on accommodation and support, particularly mental health services. These findings were echoed in our discussions with women and frontline staff.

#### Women-only and refuge/safe house accommodation

For many women supported by Hibiscus, including those recovering from VAWG and those with dependent children, it was important for accommodation to be women-only. One woman who had been homeless for a year and a half explained:

*“They put me in a place with five men. One of them had his shirt off. I ran away in distress. I ran so far away. I went to a night shelter.”*

Some women fleeing domestic abuse or human trafficking require women-only refuge or safe house accommodation, but availability is limited. One practitioner pointed out that there is also a lack of safe house accommodation for couples. In one case she worked on, her service user chose to be homeless rather than leave her partner.

#### Gender-informed, trauma-informed and intersectional approach by staff

It was important to the women that staff onsite at the accommodation, such as security staff, and other staff that might visit such as housing officers, should be trained to take a gender-informed, trauma-informed, intersectional approach to their work. Some women required mental health support in order to feel safe and cope with living independently.

#### Women asylum seekers and victim/survivors of trafficking

The lack of gender-informed and trauma-informed provision is particularly acute for women asylum seekers and victims of trafficking. Research by Women for Refugee Women (WfRW) has found that the majority of asylum-seeking women who are detained are survivors of rape and other forms of VAWG, including domestic violence, forced marriage, female genital mutilation and sexual exploitation.<sup>17</sup> WfRW has reported:

*“Many have been accommodated in hotels, including mothers with their children. Many women experience gender-specific harms in hotel accommodation. There is no women-only accommodation for single women, and women we work with have told us they feel uncomfortable in mixed-gender accommodation, because of their previous experiences of gender-based violence. There have also been reports of women experiencing sexual harassment and threats in their hotel accommodation.”*

Hibiscus' Closed Doors report (2020) outlined the inadequacies of accommodation provided by the Home Office for women trafficking victims who are seeking asylum.<sup>18</sup> The report found that despite eligibility for safe house accommodation, some trafficked women were still receiving mainstream asylum accommodation and support which was not suitable for them. Problems included lack of safety or gender sensitivity; overcrowding; poor housing and sanitation; and overlooked mental health needs. The report recommended improvements to the Modern Slavery Victim Care Contract, improvements in training and accommodation provision, and stronger monitoring and accountability.

Hibiscus is not satisfied that these recommendations have been addressed. Recent research by Migrant Voice provides evidence of serious ongoing inadequacies in asylum seekers' hotel accommodation.<sup>19</sup>

Hibiscus has previously called for the Home Office and asylum accommodation providers to work with women with relevant lived experience and specialist organisations to co-design and co-deliver training and guidance for agencies providing accommodation and support, and for local authority housing and social care teams.<sup>20</sup>

15 [Solace Women's Aid & Connection at St Martin's \(2022\) A Strategy for Ending Women's Homelessness in London](#)

16 [Young L. et al \(2022\) Making Women Count: designing and conducting a rough sleeping census for women in London](#)

17 [Women for Refugee Women website, accessed 04/08/24. Available at: <https://www.refugeewomen.co.uk/welcome-every-woman/detention/>](#)

18 [Hibiscus Initiatives \(2020\) Closed Doors: inequalities and injustices in appropriate and secure housing provision for female victims of trafficking who are seeking asylum](#)

19 [Migrant Voice \(2023\) No rest. No security. Report into the experiences of asylum seekers in hotels](#)

20 [Hibiscus Initiatives \(2023\) Race, migration, criminalisation and mental health: The gendered experiences of Black, minoritised and migrant women in contact with the criminal justice system supported by Hibiscus Initiatives](#)

## 4. Imprisonment and immigration detention linked to housing problems

The previous government committed in its 2018 Female Offender Strategy to reducing the entry of women into the criminal justice system and reducing their imprisonment, and has recently reaffirmed these commitments and added an explicit commitment to improving women's outcomes on release from prison.<sup>21</sup> While the government made broad commitments to address the particular challenges faced by migrant women in the criminal justice system, this has not yet translated into any strategic action to address structural inequalities that can drive them into the criminal justice system and lead to their imprisonment.

### Exclusion of migrant women from Female Offender Strategy implementation

Women who are accused of offending and who do not have British citizenship are likely to be considered 'liable for deportation'. As such, they are more likely to be remanded in custody (rather than given bail in the community), and may be subject to stigma and discriminatory treatment in court proceedings, particularly as they are more likely than other women to be Black or minoritised, and to require an interpreter.<sup>22</sup> They are largely excluded from resettlement initiatives due to the usually mistaken assumption that they will not be remaining in the UK longer-term, and because they appear more likely to fail risk assessments allowing for day release from prison.

Some women are held in prison after the end of their sentence while they await a decision on immigration bail. This may be partly due to a lack of suitable accommodation in the community. Women with NRPF are specifically excluded from schemes designed to reduce homelessness for people leaving prison, such as the recently introduced HM Prisons and Probation Service (HMPPS) Community Accommodation Service Tier 3 (CAS3) which provides 12 weeks' accommodation post-release from prison.

Excluding migrant women from these opportunities for diversion, rehabilitation and resettlement puts them at greater risk of destitution, deterioration in mental and physical health, exposure to VAWG and exploitation, and reoffending.

### Imprisonment and homelessness

According to government figures, just under half (47%) of women left prison with settled accommodation in the year to March 2024. More than one in ten (11.7%) were rough sleeping on release, while 1.7% were recorded as "homeless, not rough sleeping". Nearly one in five (19.8%) were in bail or Probation accommodation, while 16.3% were living in other transient or temporary accommodation. Accommodation status was unknown for 3.5% of women.<sup>23</sup>

Measuring the scale of the problem is hindered by the differing definitions used to describe housing outcomes, and differences in how data are collected. Data are needed to measure outcomes over time post-release, including qualitative input from women regarding the nature of their accommodation, to gain a true picture. The published government data on housing outcomes do not distinguish on the basis of ethnicity or nationality, making it impossible to measure housing outcomes for migrant women.

A recent thematic inspection by HM Inspectorate of Prisons and HM Inspectorate of Probation found:<sup>24</sup>

*"...Only a third of the women we spoke to were being released to sustainable housing that was likely to last longer than three months."*

The inspection report notes the severe impact of homelessness for women, including increased risk of abuse and exploitation, the risk of breaching post-release supervision requirements or reoffending, and potential recall to prison.<sup>25</sup>

21 [Ministry of Justice \(2023\) Female Offender Strategy Delivery Plan 2022-2025; Ministry of Justice \(2018\) Female Offender Strategy](#)

22 See for example: [Prison Reform Trust & Hibiscus Initiatives \(2018\) Still no way out: foreign national women and trafficked women in the criminal justice system](#); [Robson, M. \(2022\) A suspect population? An examination of bail decision making for foreign national women in criminal courts in England and Wales](#); [Swaine Williams, K. et al, 'Achieving an intersectional approach – combating structural oppression experienced by Black, minoritised and migrant women in contact with the criminal justice system', Prison Service Journal \(forthcoming\)](#)

23 [MoJ \(2024\) Offender Accommodation Outcomes Statistics Publication, Table 4: Accommodation at release from prison](#)

24 [Criminal Justice Joint Inspection \(2024\) The quality of work undertaken with women](#)

25 [Ibid, p.4. See also: Safe Home for Women Leaving Prison Initiative \(2022\) Women's Prison Release Practice Briefing: Improving accommodation outcomes for women in contact with the criminal justice system](#) and [Prison Reform Trust \(2018\) Home truths: housing for women in the criminal justice system](#)



The Women's Prison Release Practice Briefing, published in 2022 by the Safe Homes for Women Leaving Prison Initiative, outlines the additional barriers to safe housing that are experienced by women in contact with the criminal justice system and makes recommendations for addressing this.<sup>26</sup> In relation to migrant women, this includes:

- Ensuring local authorities adopt a proactive approach to fulfilling their legal duties towards migrant women in relation to housing, preventing unnecessary delays and the cost of involving solicitors.
- Ensuring suitable, Home Office approved accommodation is available so that women leaving prison who are at risk of immigration detention can be granted immigration bail – without which women can spend significantly longer in prison as a result.

Recent research by Hibiscus into the experiences of our service users found that Black, minoritised and migrant women in contact with the criminal justice system face complex, compounding issues including VAWG, criminalisation, financial insecurity, inadequate housing, and barriers to accessing healthcare – all of which have detrimental effects on their mental health.<sup>27</sup>

The research found that Black and minoritised women are disproportionately affected by violence, including physical, psychological and sexual violence, and that they often face complex barriers to reporting these crimes. Migrant women also repeatedly report experiences of hyper-precarious employment and financial instability which greatly inhibits their ability to make sufficient housing arrangements for themselves and their families. The report argues that, by taking concrete actions to improve access to healthcare, stable employment, safe housing, and culturally appropriate support services, we can work towards a more equitable society that values the rights and dignity of all its members.

### Immigration bail

For women leaving prison and applying for immigration bail, their accommodation must be approved by Probation and the Home Office. One practitioner explained how this problem can manifest for service users coming out of prison:

*“For service users in prison, I’m finding difficulties when there are service users that are going to be released but they don’t have accommodation and therefore they can’t be released on immigration bail and they might be detained for a long time because they don’t have an address. But you can’t approach the council because of deportation order or lack of status. Is there an option for those service users?”*

In prison, practitioners were working with some women who didn’t have an address to be released to because of their immigration status and who were possibly facing deportation, as one caseworker explained:

*“It’s difficult to find a suitable address with probation approval.”*

Practitioners commented that Probation services would only help their service users find accommodation for their release from prison if they are high risk, in which case they must be accommodated in ‘suitable premises’. They reported that there is little to no support for those who are low/medium risk. It is difficult to secure Probation approval for the address, and these problems are exacerbated if there are immigration issues, as there are essentially no housing options.

*“Probation officers leave individuals homeless at the end of probation and rely on support workers.”*

Hibiscus caseworker

One service user reported that while homeless she received a text from her Probation officer saying that Probation was finished and she would have no further contact with them.

One practitioner supporting women in immigration detention commented:

*“In relation to release (not bail) I never know it’s going to happen, I just find out they have gone. So unless they are able to stay in touch with me I can’t*

26 Safe Homes for Women Leaving Prison Initiative (2022) Women's Prison Release Practice Briefing

27 Hibiscus Initiatives (2023) Race, migration, criminalisation and mental health: The gendered experiences of Black, minoritised and migrant women in contact with the criminal justice system supported by Hibiscus Initiatives

*do anything. They get given a Nokia phone while in the IRC and then use their own phone when outside, though usually continue using the same email address. Once they're gone, they're gone."*

Women with bail applications are sometimes given NASS accommodation, as she explained:

*"The women I work with are only in the unit where I work for two to three days. We can help them apply for NASS accommodation if they're an asylum seeker and can help them contact family outside the centre if they are unable to do so."*

Another practitioner added:

*"You are bailed, you have to sign with the IRC [Immigration Removal Centre] and probation every week, sometimes twice a week, maybe Croydon, but you don't have money to get there; you don't work, you don't have a home. They don't care about your situation."*

Practitioners described the problems experienced by migrant women who are not asylum seekers or refugees, but who are nonetheless ineligible for support. One practitioner explained:

*"We are putting women at risk every single time we let them on the streets ... they are not eligible for anything. I have referred service users to many organisations and they all came back to me saying, 'We want to help but she's not eligible for our support.' One woman was almost one year on the street and will go back on the street. She was sleeping outside in the cold and has mental health issues. Nobody was able to provide her with anything, including through MARAC. We are talking about women who have experienced DV [domestic violence] and trafficking and they are still on the streets and no one is doing anything for them."*

Practitioners described how difficult it can be to help service users find accommodation after prison. One practitioner had received a referral from an organisation offering through-the-gate support. This referral said that the organisation 'can't do anything' in relation to the service user's housing due to immigration issues. The practitioner commented:

*"The referral is made to me and I have to find a solution."*

In another case, a service user was living with her abusive partner in a joint tenancy. The partner was arrested and sent to prison, making her homeless, and she was unable to find other accommodation. She was told she was intentionally homeless. She had to stay with someone else who ended up being abusive towards her. The practitioner concluded:

*"This creates a situation where people are vulnerable to exploitation."*

## Imprisonment post-sentence

Hibiscus understands from recent anecdotal reports that migrant women have increasingly been held in prison beyond sentence pending decisions on immigration bail. It is not clear whether this is due to a lack of available, suitable housing in the community. There are also concerns that where women are being told that they may be moved to the IRC at Derwentside, they may be choosing to stay in prison near London rather than travel hundreds of miles away. Hibiscus was informed by Ministry of Justice officials in October 2023 that the Home Office and Ministry of Justice 'have worked to reduce the number of detainees held in prisons post release and have reached a record low'. It is not clear if this is the case for migrant women specifically.

## Exclusion from CAS3 accommodation

Under the CAS3 scheme introduced in 2021, individuals leaving prison at risk of homelessness should now be offered 12 weeks' CAS3 accommodation by Probation. This important new scheme is not available however, to those with NRPF. In October 2023, Ministry of Justice officials informed Hibiscus:

*CAS3 is intended to provide a platform from which Probation can engage with the individual, and relevant partner agencies, to help secure the effective move-on from the temporary CAS3 provision into long-term settled accommodation.*

*Currently Probation provide rehabilitative support to all prison leavers, including FNOs [foreign national offenders] with no recourse to publicly funded benefits and therefore an individual's needs will be supported.*

*Existing LA [local authority] provision to support FNOs with no recourse to publicly funded benefits will instead be utilised to support those released from prison until their immigration status has been resolved.*

However, in practice, exclusion from HMPPS-funded accommodation leaves migrant women even more vulnerable to destitution, abuse, exploitation, mental health deterioration and further criminalisation. It is also arguably discriminatory, as migrant women in contact with the criminal justice system are more likely than others to be Black or minoritised and are clearly experiencing less favourable treatment.

## 5. Data gap

There is very limited published, disaggregated national data about migrant women's experiences of the criminal justice system and immigration system, and their housing needs and outcomes. We aim to address this in part through the casework data included in this report. The work being done by Single Homelessness Project in collaboration with others to develop the Women's Rough Sleeping Census, including a focus on migrant women, is also aimed at addressing this gap.<sup>28</sup> In order to establish a baseline and measure progress, further work is needed by the MoJ to ensure the necessary data is appropriately collected, analysed and published regularly.

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28 [Young L. et al \(2022\) Making Women Count: designing and conducting a rough sleeping census for women in London](#)

# DEVELOPING FRONTLINE PRACTICE

We aim to strengthen Hibiscus' frontline work through two new frontline roles, and to measure the impact of these roles for our frontline staff and the women we support. We also aim to help develop and promote better ways of working amongst all organisations (statutory and non-statutory) who have a role to play on the ground in addressing migrant women's housing needs. In doing this work we are collaborating with other expert organisations and building on existing resources.

## Value of specialist housing roles to strengthen Hibiscus' casework

The Safe Housing for Migrant Women project has been welcomed by Hibiscus practitioners as a valuable opportunity for the team to learn and gain more support to improve housing outcomes for their service users. Two new frontline roles are central to the project:

- **The specialist housing project worker** is based in the community, and delivers housing advice to members of the team and women accessing Hibiscus' service in order to improve their housing outcomes. She has a combination of immigration and housing knowledge.
- **The through-the-gate project worker** provides intensive support to women being released from prison, supporting them to access services and reintegrate into the community.

These roles supplement the existing casework team, who are not housing specialists but who provide housing advice and advocacy as part of a holistic service. Hibiscus caseworkers discussed the challenges involved.

One practitioner explained:

*"I built my confidence by challenging a few cases. Some housing departments are different from others - some you can easily negotiate and reach somewhere. Some are so difficult, especially when they don't reply to your emails. There is some specific information about housing that probably we don't know. I have done training on housing but when I'm stuck, just to speed up the process, probably we need you [the specialist housing project worker]."*

Practitioners agreed from the outset that the specialist housing project worker was going to be a very important role. The team discussed how the role might work through internal referrals of cases, reflection meetings, meetings with service users and presentations. They had previously found it useful to have support from housing specialists at sister organisations, but these specialists did not always have expertise in working with migrant women, as one explained:

*"...because my service users were non-British, she didn't know what to do."*

Having a combination of immigration expertise and housing expertise was expected to be useful. Practitioners noted that having someone in the team with the capacity to build relationships with local authorities would also be helpful:

*“Having someone internal who can build connections within the council etc and help by contacting people in individual cases – if you’ve got connections that’s a huge positive. That’s often how housing is done. You need to know someone to get it done quickly. We don’t have that because we cover the whole of London.”*

The team discussed how the post could support them with casework:

*“Some kind of internal referral system, if we have a service user we feel like we’re hitting a wall with...”*

One worker suggested that it might be helpful for the specialist housing project worker to find or produce resources to support the team:

*“For me, personally, I would like some kind of flow chart from an information perspective – you’ve got a service user and I want to see exactly what that process looks like and the different avenues it goes down – these are your options – just because I find it all a bit of a minefield. The council accepts different duties and what does that mean and how do I challenge that?”*

The team agreed they would like to consider how they might develop their relationships with local authority housing departments, such as inviting them to meet the team, to tell them about our work and the issues our service users face.

## **Housing advice sessions and workshops for staff and women**

Since early 2023, the specialist housing project worker has facilitated numerous housing advice sessions with members of Hibiscus’ Community and Prison practitioner teams, offering housing advice to project workers who are supporting women with active housing needs.

She has also held a series of housing workshops for the women we support, to provide more education about the systems in place and how they can empower themselves to improve their housing situations. The first workshop was centred around private rented accommodation; the women learned about how to safely search for private rented accommodation, what financial support is available for rent and bills, the different landlord and tenant responsibilities, and how to manage issues within private rented accommodation (such as disrepair).

Seven women attended the workshop, including some who did not yet have their status but wanted to be prepared and learn about private rented accommodation for when they would be able to access it themselves.

Subsequent workshops have been held for a total of 23 women. These covered the process of applying for housing assistance from the local authority (detailing homelessness applications and applying to the housing register), accessing asylum support accommodation and managing issues that may arise.

The goal of the workshops so far has been to provide opportunities for empowerment and help equip the women with the necessary tools to advocate for themselves while dealing with housing issues throughout the course of their case.

## Challenges and what works well

We have begun to explore with our frontline colleagues what challenges are involved for them in supporting service users and what works well, with a view to identifying how organisations can work more effectively together to meet migrant women's housing needs.

One worker commented on the disparity in outcomes for women with insecure immigration status:

*“The service users that I find it goes OK with are the ones that have better status. If you have indefinite leave or five years pre-settled, but for service users with no status or insecure status or deportation orders, that is a clear distinction as to how they are treated.”*

Another colleague noted that in her experience migrant women were expected by statutory services to be grateful for whatever they got:

*“I have to make my service users aware of the fact that, especially those that are asylum seekers, when you say you're fleeing from violence etc there is an assumption that anywhere is better than where you were. Often people don't understand why you need to be in a particular area, because it's better than where you came from, so how serious is your need. They think like that and I've heard it from people in housing. 'It doesn't matter that it's outside of London - why does she care?' A feeling that you're being ungrateful if you don't accept.”*

Another worker explained how hard it was to achieve any positive outcomes for service users in these cases, illustrating the wasted hours spent to arrive at the right outcome, during which time service users are suffering and resources are being used up by Hibiscus and statutory services:

*“I just feel that any positive outcome that's achieved, for me personally, has been months of work and many hoops jumped through. My personal feeling is...is it a positive outcome if they had to live in a horrible place for months first? It does end up good quite often actually but the process to get there feels really draining.”*

One caseworker explained how one case, which was eventually resolved positively, required 'almost two months of fighting with them [the local authority]', adding:

*“In the end when they accepted her, she got all possible support. She has a supportive social worker, a support worker who visits twice a week, takes her for shopping, looks after the child. She has received all possible support from social services. I'm also closing the case... That has to be one of the best cases to share with you.”*

Another member of the team noted how, even where an improvement has been achieved, it may not be what the service user really wants, and there are limits to what can be achieved:

*“It's worth bearing in mind that even a positive outcome might often not mean something that's wholly good. Expectation management is really important. For example I worked with a service user in my previous job where we fought really hard to get her the accommodation she was entitled to. It was a slightly small flat that was warm enough and she had everything that the council believed she needed, but it wasn't a particularly nice location. It wasn't challengeable. It wasn't something she was totally happy about. That was a lesson in managing expectations and discussing with the service user what a positive outcome would look like, and it might not be accommodation that they love or are even happy with, but there is a limit to what we can do even if we do get the best outcome for them.”*

Another added:

*“Often our standards of safety and suitability differ considerably from what statutory services offer.”*

One worker noted that the Covid-19 pandemic led to some improvements in housing provision and processes, illustrating that it was possible to create change:

*“I feel like Covid had quite a positive impact on the housing situation. Pre-Covid I had a lot of homeless service users. Then the Covid rule was, you're not allowed to be homeless so they had to house everyone. One service user had been sleeping on the floor of her church for two years. They wouldn't house her because they said she had accommodation. Then Covid meant the council had to buck their ideas up. She had to move from North London to [a South London borough] but she is housed. I don't know if it's gone back to the state it was in pre-Covid.”*

When asked to share information about examples of good practice, the team mentioned DePaul, a charity supporting homeless people under 25:

*“Every time I've contacted them they've been amazing. I had one lady and everyone was saying no and they got her somewhere in half an hour. Their reaction is what you want from the council.”*

We are continuing these discussions within and outside Hibiscus and will be publishing a toolkit in due course to promote better ways of working to improve housing outcomes for migrant women and their children.

# CONCLUSION

Hibiscus has for some time advocated investment in suitable social housing in communities that are accessible to migrant women, including asylum seekers, taking a gender-informed and trauma-informed approach to meeting the needs of women (including victims of trafficking and VAWG), pregnant women and children, and increasing the availability of women-only accommodation and support, including safe house accommodation where needed.

The evidence gathered in this report underlines the need for action to uphold the rights of migrant women and their children to safe, secure and decent housing. This means ending the misconceived prioritising of immigration control measures over migrant women's safety and wellbeing. It means ending the use of poor quality, shared accommodation; it requires the adoption of a gender-specific, trauma-informed and intersectional approach to ensure adequate housing is available and accessible. Specific attention is needed to ensuring that migrant women do not leave prison or immigration detention to homelessness and that they are not detained for longer than necessary due to lack of housing. The gap in data must be addressed to build the evidence base and measure progress.

Our recommendations for reform are set out in an accompanying policy briefing.

# ANNEX – WIDER FAILINGS AND RECOMMENDED REFORMS

Wide-ranging failings by the state to address poverty and homelessness, and the denial of basic rights to migrants, have an impact on migrant women’s access to safe and suitable housing. These have been the subject of recommendations from a range of expert organisations as outlined below. Our recommendations arising from this evidence report are set out in an accompanying policy briefing.

## Rebuilding the broken housing system

Shelter has campaigned for the UK’s broken housing system to be rebuilt by:<sup>29</sup>

- Building a new generation of social homes.
- Making renting affordable – including by abolishing the household benefit cap that limits the total amount of benefits that households can receive.
- Raising standards in rented homes.
- Strengthening housing rights.

These improvements must be made equally available to migrant women, recognising their additional needs, rather than operating a two-tier system in which migrants’ rights, and particularly the safety of migrant women, are downgraded.

## Building a fair and humane asylum system

The Refugee Council has campaigned for the implementation of a fair and humane asylum system, including by:<sup>30</sup>

- Giving refugees and people seeking asylum a fair hearing in the UK, no matter how they arrive, in keeping with commitments to international law.
- Ensuring migrants are appropriately housed in the community with support to integrate.
- Reducing the backlog of people waiting for a decision on their asylum claim.

WfRW aims to ensure women seeking safety in the UK have access to a fair and timely decision that recognises her specific experiences of persecution, including by:<sup>31</sup>

- Repealing the Illegal Migration Act 2023 so that women seeking safety can claim asylum in the UK.
- Dismantling the culture of disbelief that means women are often disbelieved and wrongly denied protection.
- Ensuring asylum decisions are timely and fair.

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29 [Shelter \(2023\) The Way Home: A Manifesto to Rebuild our Broken Housing System](#)

30 [Refugee Council \(2023\) Towards a National Refugee Strategy: Our vision for a fair and humane asylum system](#)

31 Women for Refugee Women website, accessed 15/12/2023. Available at: [Women for Refugee Women : Decision-making](#)



Refugee Action has asked the government to improve accommodation for individuals seeking asylum by:<sup>32</sup>

- Housing people seeking asylum in high quality and appropriate accommodation in communities
- Bringing standards for asylum seeker housing into line with those of the rest of the population and adjusted for their specific needs, as explained in Refugee Action's accommodation principles which to a great extent mirror our service users' priorities:<sup>33</sup>
  - Are people able to stay safe?
  - Do people have privacy?
  - Are people able to connect with loved ones, support services, legal advice and the wider community?
  - Does the accommodation reflect (and respond to) people's needs?
  - Do people have autonomy and independence?
  - Do people have stability?
- Working with and funding local authorities and NGOs to run integrated housing, support, and legal advice in communities and address the crisis in social housing.

Our research findings directly reflect the need for these reforms.

## Tackling child poverty

Child Poverty Action Group has campaigned for the government to recommit to ending poverty as a national priority, with a comprehensive strategy and targets, including the following immediate steps:<sup>34</sup>

- Scrap the two-child limit to support in universal credit and tax credits.
- Abolish the benefit cap which restricts the total amount of support a working-age household can receive from the social security system if they are earning less than the equivalent of 16 hours a week at the minimum wage or not in paid work.
- Raise child benefit by £20 a week per child.
- Roll out universal free school meals across England.

These reforms must be equally available to the children of marginalised migrant women.

## Giving migrant women equal protection from domestic abuse and other forms of VAWG

The Independent Domestic Abuse Commissioner, Latin American Women's Rights Service (LAWRS), Southall Black Sisters (SBS) and others have called on the government to:<sup>35</sup>

- Introduce a firewall to stop data sharing between statutory agencies and Immigration Enforcement to enable victim/survivors to come forward to report abuse and seek help, as recommended by the Justice Select Committee and Independent Domestic Abuse Commissioner.
- Extend the Domestic Violence Indefinite Leave to Remain (DVILR) and the Migrant Victims of Domestic Abuse Concession (MVDAC) joint model for those on partner/spousal visas to all migrant victim/survivors of abuse regardless of their immigration status, to prevent them from being trapped in violent relationships due to NRPF.
- Extend the current three-month provision to six months under the MVDAC to give victim/survivors the 'breathing space' to resolve problems by seeking advice and recover from abuse and to encourage more refuge providers to accept referrals and not turn migrant women away .
- Increase investment in frontline women's specialist 'by and for' services to give migrant women the protection they need from domestic abuse and other forms of VAWG.

These essential, long over-due reforms would all help to improve access to safe and secure housing for migrant women and their children.

32 [Refugee Action \(2023\) Hostile accommodation: how the asylum housing system is cruel by design](#)

33 [Refugee Action website, viewed 15/12/2023. Available at: Asylum Accommodation Principles - Refugee Action \(refugee-action.org.uk\)](#)

34 [Child Poverty Action Group website, viewed 15/12/2023. Available at: Solutions to poverty | CPAG](#)

35 [Independent Domestic Abuse Commissioner \(2021\) Safety before status: the solutions](#)

# Hibiscus

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Published by  
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Hibiscus Initiatives Limited is a  
registered charity no. 1104094 and  
a company limited by guarantee,  
registered in England no. 4533442

Supported by Oak Foundation