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Wednesday 19 May 2021

Dear Marc Owen OBE,

Changes to Biometric Enrolment.

As a coalition of organisations supporting abused migrant women, we write to express our concern and dismay about the proposed changes to the enrolment of biometrics for victims of domestic violence and abuse. We have learned that, as of 26 May, biometric testing can only take place at an immigration centre (UKVI Services and Support Centre), whereas previously this service was available at a wide range of relatively local, and perceptually neutral, post office locations.

We are at a loss to understand how or why this decision was arrived at without prior discussion or consultation with those of us who, often funded partially or wholly by central government to do so, support extremely vulnerable migrant service-users experiencing abuse and violence. Indeed, the Home Office made a commitment to consult on any such changes at a meeting on 23 January 2019, attended by Rights of Women, the Immigration Law Practitioners' Association (ILPA), The Law Society and others. The proposed change will mean that vulnerable migrant victims of abuse will now have to go through what will be a very onerous, unnecessary and potentially discriminatory process.

As you will be aware, specialist women's organisations like ours have engaged effectively with successive governments to develop policies and initiatives that support women experiencing violence and who are subject to immigration conditions. It has therefore come as a great surprise that the UKVI has announced this sudden change about which none of us were consulted, but which will have profound, and we fear negative, implications for our services and the women using them - and, by extension, to some immigration services themselves. We set out below some of the problems this presents, many of which are practical and logistical problems that are not a feature of the current immigration arrangements and could surely be avoided.

For the whole of London and the South East, the immigration centre for biometric testing is Croydon. Many of the abused migrant women that we support have little or no access to any finances at all due to financial dependence on their sponsors and partners due to the No Recourse to Public Funds (NRPF) rule. Many are subject to economic abuse and coercive control which results in little to no freedom of movement. (The NRPF

rule and its impact on migrant women experiencing violence in the UK, has been repeatedly highlighted to UK governments by the CEDAW committee which has found it to be profoundly discriminatory.)

The migrant women who approach us are therefore often destitute, traumatised and live in a state of fear and anxiety. They certainly have limited experience of travelling around large areas of London (or if they live outside London, other large cities and regions) and have little to no confidence and/or language skills to navigate their areas successfully. The majority also shoulder the burden of caring for children, elderly relatives and running their households entirely on their own. They therefore have extremely limited time on their hands - and what time they do have is often spent in obtaining legal advice from lawyers and much needed support from the police, social services, and health services, as well as specialist organisations like ours. Some women such as European Nationals who have not yet managed to clarify their settlement status following Brexit are anxious about meeting the approaching the 30th June deadline, which means that they are not able to focus on other matters. The vast majority have a perfectly legitimate right to be in the UK and are on legitimate routes to settlement.

In the light of this, the change in relation to biometrics testing will, in our view, only increase the anxieties and fears that such women already experience. It is in any case, wholly unnecessary. As it is, many women are very frightened of engaging with any authorities, especially with immigration officials, for fear of being detained and deported, irrespective of whether or not their fear is grounded in reality. On the other hand, there may well be cases where women may actually go on to be wrongfully detained, thus requiring extensive intervention from support services such as ours and from lawyers. The requirement to attend an immigration centre will substantially add to women's stress and trauma and increase the likelihood of non-disclosure of abuse. This will make it even more difficult for us to reach out to vulnerable and 'at risk' women and ensure that they have the proper advice and representation they need to flee abuse and to regularise their stay in the UK.

For all these reasons, frontline services like ours will have to ensure that we accompany women to the immigration centres. This is a substantial, unbudgeted burden to us in terms of both time and money. We will have to pay for the travel and any other expenses, including possibly childcare, of the woman herself (at least upfront even if she can claim some of them back) and of the staff member supporting her. We will also have to write off more or less a whole day for whoever accompanies women to Croydon or to any of the other immigration centres which will be difficult to access if they live nowhere near them. We have been told that for some frontline services, the nearest UKVI centre may be over 70 miles away. Some services will not have the staff resource or funding up front to facilitate this visit, which may well result in migrant victims being denied emergency refuge, if they are unable to get around this change.

In passing the Domestic Abuse Act, the government had previously signalled its intention to ratify the Istanbul Convention. It has recognised that lockdown, and the release from lockdown, have exacerbated existing levels of violence against women and girls and the demand on services supporting women. Cases of gender-related abuse and violence with additional complexities brought about by insecure immigration status, NRPF, poverty and destitution, transnational marriage abandonment, forced marriages and related so-called honour crimes, child custody including abduction and unlawful retention, the lack of access to legal aid and so on, already take up vast amounts of our time and resources to address. Many women already have little or no access to other specialist legal and support services due to high demand and shortages and to add to the burden, they will now have to travel often long distances to an immigration centre and even further for organisations outside London. Such a measure is impractical, disproportionate and serves no legitimate purpose. Indeed, we are unaware of any evidence or research to show why this is necessary let alone an improvement upon current immigration arrangements that are both efficient and productive.

On a more immediate, topical, note, the change would also seem counter-intuitive in the current COVID pandemic since it encourages long journeys on public transport and face-to-face gathering in hubs involving

large, international groups of individuals, including those most at risk such as those from black and minority backgrounds.

We therefore urge you to withdraw this measure and to return to the existing arrangements that permit women to attend a local post office to enrol for their biometrics. Failing that, we would like to know more about the reasoning behind this initiative. We also request that the new arrangement be delayed pending a meeting between ourselves, and the relevant team within the UKVI, so that we have the opportunity to set out our concerns and to consider other alternatives for victims of domestic violence and abuse.

We look forward to hearing from you about this measure and the rationale behind it.

Yours Sincerely,

1. **Pragna Patel, Director, Southall Black Sisters**
2. **Gisela Valle, Director, Latin American Women's Rights Service**
3. **Umme Imam, Executive Director, Angelou Centre**
4. **Halaleh Taheri, Executive Director, Middle Eastern Women and Society Organisation**
5. **Andrea Simon, Director, End Violence Against Women Coalition**
6. **Pam Saleem, Operations Manager, Ashiana Network**
7. **Sarbjit Ganger, Director, Asian Women's Resource Centre**
8. **Meril Eshun-Parker, Director, London Black Women's Project**
9. **Eunice Manu, Coordinator, Women Asylum Seekers Together Manchester**
10. **Estelle du Boulay, Director, Rights of Women**
11. **Farah Nazeer, Chief Executive, Women's Aid Federation of England**
12. **Maureen Connolly, Birmingham and Solihull Women's Aid**
13. **Baljit Banga, Executive Director, Imkaan**
14. **Sara Kirkpatrick, Chief Executive, Welsh Women's Aid**
15. **Dr Marsha Scott, Chief Executive, Scottish Women's Aid**
16. **Gabriela Quevedo, Advocacy, Community and Learning Director, Latin American Women's Aid**
17. **Yasmin Rehman, Chief Executive, Juno Women's Aid**
18. **Fiona Dwyer, CEO, Solace Women's Aid**
19. **Sara Ward, Chief Executive, Black Country Women's Aid**
20. **Dania Thomas, Director, Ubuntu Women's Shelter**
21. **Priya Chopra, Chief Executive, Saheli**
22. **Sawsan Salim, Director, Kurdish Middle Eastern Women's Organisation**
23. **Sagina Bi, Acting Manager, Apna Haq**
24. **Liz Felton, Chief Executive, Rape Crisis South London**
25. **Karen Ingala Smith, Chief Executive, nia**
26. **Shonagh Dillon, CEO, Aurora New Dawn**
27. **Diana Nammi, Executive Director, Iranian and Kurdish Women's Rights Organisation**
28. **Jayne Butler, CEO, Rape Crisis England and Wales**
29. **Gurpreet Virdee, Director of Operations and Development, Women and Girls Network**
30. **Suzanne Jacob, CEO, SafeLives**
31. **Medina Johnson, Chief Executive, IRISi**
32. **Dr Liza Thompson, CEO, SATEDA**
33. **Natasha Rattu, Executive Director, Karma Nirvana**
34. **Gwen Bleasdale, Chief Executive, The Liberty Centre**
35. **Shahien Taj, Executive Director, Henna Foundation**
36. **Chris Davies, Head of Client Services, IDAS**
37. **Maria Constanza Mesa, Operational Director, Women Connect**

- 38. Harriet Wistrich, Director, Centre for Women's Justice**
- 39. Diana Fawcett, Chief Executive, Victim Support**
- 40. Tahmina Khan, Chair, Bangladeshi Women's Association Wales**
- 41. Shani Lee, Coordinator, London Violence Against Women and Girls Consortium**
- 42. Wendy Bulman, Service Manager, Shropshire Domestic Abuse Service**
- 43. Donna Covey CBE, Chief Executive, Against Violence and Abuse**
- 44. Dr Mary-Ann Stephenson, Director, UK Women's Budget Group**
- 45. Angela Everson, Chief Executive, WomenCentreLtd**
- 46. Ursua Lindenberg, Director, VOICES**
- 47. Sarah Horscroft, Senior Services Manager, Advance**
- 48. Fran Ellis, CEO, Rising Sun Domestic Violence and Abuse Service**
- 49. Samantha Higginbottom, Senior Independent Domestic Violence Advisor, Stockport Without Abuse**
- 50. Davina Clarke, Engagement Officer, Anah Project Ltd**
- 51. Jess McQuail, Director, Just Fair**
- 52. Hilary Brown, CEO, Virgo Consultancy Services Ltd**