

Submission by Southall Black Sisters to the Office of the United Nations High Commissioner for Human Rights.

COVID-19 and the increase of domestic violence against women.

Introduction to Southall Black Sisters

1. Founded in 1979, Southall Black Sisters (SBS) is a leading UK based non-governmental organisation (NGO) for black and minority ethnic (BME) women. The bulk of our work is directed at assisting women and children - overwhelmingly survivors of domestic and other forms of gender-related violence - to obtain effective protection and to assert their fundamental human rights. Based in West London, SBS provides advice, advocacy and support to women who represent some of the most marginalised and disadvantaged groups in our society. Many arrive at SBS having experienced violence and abuse and related problems of homelessness, mental illness, poverty and insecure immigration status. Our advice and casework ranges from dealing with one-off enquiries, to undertaking mid to long-term casework, which covers a number of overlapping support needs. Our work has a national and even international reach, and we handle on average 500 new cases and 6500 calls to our helpline every year.
2. At least 60 per cent of the women that SBS works with have insecure immigration status. Some of these women are dependent on their partners or spouses for their immigration status, whilst others arrive in the UK through other immigration routes. Most become destitute once they flee domestic abuse and then find themselves unable to obtain safety through access to safe alternative accommodation or benefits, due to the NRPf condition in immigration law. NRPf is a legal restriction imposed by the UK Border Agency on people subject to immigration control, preventing them from accessing non-contributory welfare benefits and social housing. Breaching this condition puts a person's current or future right to be in the UK at risk. As a consequence, many abused women with NRPf who escape abuse face homelessness and destitution, and are often forced to find other means of survival that are full of immense risks and dangers, or to reconcile with their abuser(s). In the context of the pandemic, this group of women have been particularly impacted since they have been wholly excluded from the UK Government's funding announcements; and policies enacted to protect vulnerable groups.
3. We have campaigned for many years for adequate protection for BME women facing gender-related violence. We have been particularly focussed on the exclusion of migrant women experiencing abuse from protection measures in the UK. From the late 90s onwards, we worked with the UK's Home Office to bring about reforms in immigration law and policy to provide migrant women who were denied access to the welfare state, a route to leave abusive relationships without fear of deportation and destitution. We were instrumental in the enactment of the Domestic Violence (DV) Rule in 2002¹ and the Destitute Domestic Violence Concession (DDVC) in 2012.² Consequently, migrant women on spousal visas in the UK who

¹ <https://www.gov.uk/government/publications/application-to-settle-in-uk-form-setdv>

² <https://www.gov.uk/government/publications/application-for-benefits-for-visa-holder-domestic-violence>

experience domestic abuse now have a route to safety and protection. The DV Rule means that those who are in the UK on a spouse or partner visa, and whose relationship breaks down because of domestic violence, can apply for Indefinite Leave to Remain (ILR) if they can show that they are victims of domestic abuse. The DDVC allows those making applications under the DV Rule to access public funds for a three-month period, pending the outcome of their DV Rule application.

4. New domestic abuse legislation (The Domestic Abuse Bill) was first announced in the UK in June 2017, and since then we have been campaigning to ensure that protection for migrant women is included and placed on a statutory footing. Details of our campaign can be found in our Domestic Abuse Bill briefing papers: [here](#) and [here](#).

The Covid-19 pandemic and violence against women and girls

5. The emergence of the Covid-19 pandemic in the UK raised serious concerns about the consequences for women and girls subject to violence and abuse in their homes, particularly BME and migrant women. There is long-standing evidence to show that rates of violence against women and girls (VAWG), such as domestic abuse, typically increase in periods of crisis and conflict, including wars³ and natural disasters. It is also well known that these moments of crisis can aggravate pre-existing inequalities, by further marginalising already disadvantaged groups.⁴
6. On 23 March 2020, the Government introduced three new measures to contain the spread of Covid-19, commonly referred to as 'lockdown': 1) requiring people to 'stay at home', except for very limited purposes 2) closing certain businesses and venues, and 3) stopping gatherings or more than two people in public.⁵ We remain concerned that the measures announced have created a conducive context for abuse, giving rise to impunity for perpetrators and heightening risks to women.

To what extent has there been an increase of violence against women, especially domestic violence in the context of the COVID-19 pandemic lockdowns? Please provide all available data on the increase of violence against women, including domestic violence and femicides, registered during the COVID-19 crisis.

7. Within the first few weeks of lockdown, data began to emerge from multiple sources, including our own figures, showing a rise in domestic abuse and domestic abuse-related homicides. The following quotes provide examples of what women were reporting to SBS:

"I don't know how long this situation with the virus will last but I'm sure that it's going to be difficult and very stressful for us. It is not obvious and tricky, the gaslighting and the crazy

³ <https://www.rescue-uk.org/sites/default/files/document/2051/p868ircsynthesisbriefreportlr.pdf>

⁴ <https://www.odi.org/sites/odi.org.uk/files/resource-documents/11113.pdf>

⁵ <https://www.gov.uk/government/publications/full-guidance-on-staying-at-home-and-away-from-others/full-guidance-on-staying-at-home-and-away-from-others>

making... I've reached a point like today when my hands are shaking during an argument and I can't stop it! I need your help and your experience to make this self-isolation bearable for me and my son."

"We are separated but we are still living under the same roof as he refuses to move out. It was okay before because he would be out until late, but the Covid pandemic is causing more upset. I feel pressure because he shouldn't be going out the house anymore, but I have no control over him. He chooses when he wants to go out, putting my children and I at risk of catching the virus. He went out drinking recently, then came home and called me names in front of my child. I'm trying to shield my children from it but I can't. With Covid-19, it's even more intense. I've pleaded with him to go and stay with his family or friends, I told him not to drink at home but he won't listen. He does what he wants, it's a control thing. I feel depressed, alone. I can't call my family to come round anymore, as I don't want to put them at risk. I'm getting more and more anxious that he's going out when he shouldn't be. I'm having to negotiate with him when I don't want to, and I don't know when he's going to retaliate."

8. In April 2020, we saw a 62% rise in referrals to our service from a single borough - compared to the same period in the previous year, as well as a 17% increase in new visitors to our website, compared to the same period in 2019. In May 2020, we had 17 referrals to the Multi Agency Risk Assessment Conference (MARAC) for victims who have been identified as at high risk of serious harm or homicide, in a single week.⁶ At the same time, in the North of England BME specialist services reported a 30-50% increase in referrals.⁷ A similar picture emerged in statutory services, with London's Metropolitan Police service reporting a 24% rise in domestic abuse charges and cautions between 9 March (the date when people with symptoms were asked to self-isolate) and 24 April.⁸
9. The UK also saw a spike in domestic homicides over the same period. According to the campaigning group 'Counting Dead Women', since the 23rd March 2020, 26 women (and two young children) have been killed by their partners or family members, with further information pending about the murder of an additional seven women (amounting to a total of 35 domestic homicides of women and children in seven weeks).⁹ This means that an average of around 5 women are killed a week in the UK. This figure is more than double the general trend of 2 women killed a week by a current or former partner in previous years, according to the Office for National Statistics.¹⁰
10. SBS, along with many other BME specialist organisations have also repeatedly warned the UK Government that the true extent of the increased prevalence of abuse will not be uncovered

⁶ <https://www.standard.co.uk/news/uk/bme-domestic-abuse-charity-sees-highest-volume-of-calls-for-help-in-40year-history-during-lockdown-a4470791.html>

⁷ https://829ef90d-0745-49b2-b404-cbea85f15fda.filesusr.com/ugd/2f475d_6d6dea40b8bd42c8a917ba58ceec5793.pdf

⁸ <https://www.theguardian.com/society/2020/apr/24/charges-and-cautions-for-domestic-violence-rise-by-24-in-london>

⁹ <https://kareningalasmith.com/2020/04/14/2020/>

¹⁰

<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/homicideinenglandandwales/yearendingmarch2018#how-are-victims-and-suspects-related>

until lockdown restrictions are eased, and for some time after. We are anticipating a surge in reports as many women in the most dangerous and precarious circumstances currently remain unable to seek help; particularly those who face additional barriers to escaping, such as disabled women, BME and migrant women; those who do not have English as a first language, and are isolated – without friends, family or networks of support in the UK. This remains a major concern. Despite our call to the Government to plan for the post ‘lockdown’ surge in demand, the Government has insisted that the funds it has belatedly made available to support abused women in the context of the pandemic must be spent by the end of October 2020 (see details of the Government’s funding announcements in paragraph 40 below.)

11. Our experience suggests that many of abused migrant women with NRPF currently remain hidden from official statistics and the reach of services. We have long drawn attention to the fact that perpetrators weaponise women’s insecure immigration status, by manipulating their fear of reporting abuse and their dependency on them for their survival. A lack of adequate protection for abused migrant women essentially guarantees their silence and gives perpetrators a green light to commit gender-related violence with impunity.
12. Our experience during the pandemic has not only shown an increase in the prevalence of VAWG in the UK, but our service, and many others, are experiencing an increase in demand from existing users, who are struggling with the increased isolation and the withdrawal of physical networks of support. SBS has expanded our provision of telephone and online counselling sessions since it is the only point of access for many, and serves as a vital lifeline for women who are isolating, and oftentimes distressed. Each contact through our telephone advocacy work takes longer than usual. In some cases, we have also had to provide mobile phones or financial support to provide unlimited data on mobile phones so that we can maintain communication with our users. Of the combined users of SBS and 3 BME specialist services, 39% do not have safe access to phones, credit and/or the internet. Since the week commencing 20 April, we have offered weekly outreach advice surgeries online via Facebook messenger or email, for those who cannot safely contact us by telephone.¹¹We also carry out more frequent welfare checks on existing and new users.

Are helplines run by the Government and/or civil society available? Has there been an increase in the number of calls in the context of the COVID-19 pandemic?

13. There are helplines available for women and girls experiencing domestic abuse, however at the point of lockdown, these were not provided with additional resources and funds to meet increased demand. Many have struggled due to lack of capacity during the pandemic. As of 1 June, the National Domestic Abuse Helpline saw an overall increase in demand of 66%; with staff noting that many of these were from third parties, including statutory services and concerned friends and family. In April 2020, SBS’ own national helpline for BME and migrant women (including those with NRPF) experienced a 19% increase in calls compared to the previous year, as other preferred routes to seeking help, including ‘drop-ins’ had all but vanished.

¹¹ <https://southallblacksisters.org.uk/news/sbs-launches-live-outreach-advice-surgeries/>

14. Following an outcry, almost one month after lockdown in the week commencing 20 April, the Government announced that it was making £2million available to ‘immediately bolster domestic abuse helplines and online support.’¹² However, there was a lack of transparency about how this funding was to be distributed and despite the claims that funding would ‘immediately’ relieve helplines, it took at least another three weeks for £1m of the funding to reach the chosen mainstream services such as Refuge, Respect and Rape Crisis. As of 12 May, none of the selected helplines had received that funding, and by 19 May, the remaining £1m had not yet been allocated to any services.
15. The public awareness campaign which preceded the helpline funding also created considerable frustration and ‘nervousness’ in the VAWG sector since it raised expectations that help and assistance would be available to those reporting domestic abuse, without the provision of additional resources to meet demand - particularly the provision of alternative accommodation options (explored further from paragraph 33 onwards) and support for BME and migrant women through the funding of specialist services (paragraph 57).

Can women victims of domestic violence be exempted from restrictive measures to stay at home in isolation if they face domestic violence?

16. At the date when lockdown was introduced on 23 March, the UK Government had not initiated any co-ordinated crisis strategy on VAWG and Covid-19 (and it still has not done), nor had it consulted with the VAWG and BME specialist sector regarding the implications of lockdown for service-users or women and girls facing abuse at home. We have also not had the opportunity to review the Government’s equality impact assessments as these have not been made publicly available. Consequently, at the time of announcement, there were no accompanying statements concerning women and girls living in abusive circumstances, including any such exemptions from restrictive lockdown measures.
17. In the absence of guidance from the Government, local specialist services and local authorities were effectively left to their own devices, practices and interpretations of existing laws and policies in relation to abused women and children. This means that abused migrant women remain neglected. In one case in Manchester, a migrant woman and her three-year old child experienced domestic abuse and the police temporarily removed her husband from the home, one week after lockdown. However, the woman was told by the police that she would not be provided with alternative accommodation due to the ‘stay at home’ guidance. She was instead instructed to remain in the home, where her husband was due to return, and to ‘remain vigilant’. Her husband returned home unaccompanied early the next day, placing her and her child in great danger.¹³ Domestic abuse organisations have frequently reported accounts of women being told to “stay put” in abusive environments during lockdown. Migrant women, for whom the normal routes to safety are not available, were and continue to be frequently met with this response from the police and social workers. Others are met with a more

¹² <https://www.gov.uk/government/news/home-secretary-announces-support-for-domestic-abuse-victims>

¹³ <https://www.safety4sisters.org/blog>

punitive response if they summon up the courage to report their abuse.

18. Almost one week after lockdown and three weeks after people with symptoms were asked to self-isolate, the UK's Home Secretary Priti Patel made a statement in a Sunday newspaper (the Mail on Sunday), acknowledging that guidelines about social distancing and self-isolation could leave 'the victims of hidden crime, such as domestic abuse and child sexual abuse, feeling especially isolated, vulnerable and exposed.'¹⁴ This was accompanied by government guidance which clarified that 'the household isolation instruction as a result of coronavirus does not apply' to anyone who needs 'to leave [their] home to escape domestic abuse.'¹⁵ Almost a month later, on 27 April, a letter was sent by the Minister for Rough Sleeping and Housing, Luke Hall MP, to all local authority leaders in England stating that they should:

"work closely with domestic abuse safe accommodation providers in [their] area to ensure that victims of domestic abuse and their families, including those from out of [their] area, can be provided with safe emergency accommodation with appropriate support."

19. However, no additional funding was provided for this purpose; instead local authority leaders were directed to use the £1.6bn of funding already announced for councils on 18 April, for the purposes of responding to the pandemic, mainly to house rough sleepers.¹⁶

Restrictions for migrant women with NRPF

20. To date, there has been no such guidance or exemptions for migrants or attempts to lift immigration restrictions, including for migrant women with NRPF who are facing abuse and violence at home. The Government has refused to suspend the NRPF condition, as has been done in other European countries, such as Portugal where foreign nationals with pending immigration applications temporarily have the same rights associated with permanent resident status – including access to public services.¹⁷ This leaves many abused migrant women with a dangerous 'choice'; between staying in an abusive environment during the pandemic, or facing destitution and detention, since they are excluded from the welfare safety net that other abused women can access to escape abuse.¹⁸
21. The lockdown measures, combined with the absence of any guidance regarding women with NRPF, has led to chaos and inconsistency in local authorities' interpretation of their duties. Where there are destitute women with children subject to NRPF, according to legislation local authorities are obliged to safeguard the welfare of children, young people and other vulnerable adults under Section 17 of the Children Act 1989. This includes the provision of

¹⁴ <https://www.dailymail.co.uk/news/article-8163919/Priti-Patel-admits-home-not-safe-haven-abuse-rises-amid-Covid-19-crisis.html>

¹⁵ <https://www.gov.uk/government/publications/coronavirus-covid-19-and-domestic-abuse/coronavirus-covid-19-support-for-victims-of-domestic-abuse>

¹⁶ <https://www.gov.uk/government/news/government-pledges-extra-16-billion-for-councils>

¹⁷ <https://commonslibrary.parliament.uk/research-briefings/cbp-8888/>

¹⁸ There are reports that migrants are still being taken into immigration detention during the pandemic, even where it is known that no removal can take place:

<https://twitter.com/BellaSankey/status/1247875611554709504>

accommodation and financial support.¹⁹ However, even prior to the pandemic this was not always realised in practice for a number of reasons, including the climate of austerity and the absence of adequate government statutory guidance and support for those with NRPF. There remains considerable inconsistency in practice amongst key statutory welfare services across the UK.²⁰

22. On an almost daily basis, SBS is witness to the ways in which abused migrant women and children are turned away by local authority children's services. Sometimes they are deliberately and disingenuously sent to another agency or another borough and sometimes they are advised to return to their abuser(s) or to their countries of origin - without having gone through the requisite risk or needs assessment. We frequently have to challenge social services both for their failure to carry out assessments, and/or the poor quality of such assessments when they are carried out. For example, between July and September 2019, SBS legally challenged social services on 18 occasions for refusing to provide support under Section 17 to NRPF women with children in the first instance.

23. In the context of the Covid-19 pandemic, local authority responses have become even more problematic. Local authorities have continued to tell migrant women with children that they have no duty of care to families at risk of street homelessness should they flee domestic abuse, due to the NRPF policy. In essence, this means that the exemptions to the 'stay at home' guidance for victims of domestic abuse have not been applied to migrant women with NRPF. Our advocates have had to use our valuable time and resources challenging local authorities, including writing to Directors of Children's Services to remind their staff of their duty to safeguard children. In many cases, abused migrant women are put at direct risk of harm due to the dangerous interplay between the 'stay at home' guidance and the NRPF policy, as demonstrated in the case below from the organisation Apna Haq, based in the north of England:

"We are supporting our second victim this week who has no recourse to public funds. She was told by the Independent Domestic Violence Advocate (IDVA) from our neighbouring town, that she had no choice [but to return to her address where the perpetrator was staying]. She could not go to a refuge due to the NRPF condition, and she could not stay with her brother (where she had gone to after the police took her out of the abusive husband's home), and thus would have to return to her husband."

Widespread support for lifting the NRPF condition

24. On 16 March 2020, a coalition of organisations, including SBS, the Joint Council for the Welfare of Immigrants, Liberty and Doctors of the World wrote to the Home Secretary demanding that the NRPF condition be lifted.²¹ A fortnight later, and the day after the Government announced

¹⁹ http://www.nrpfnetwork.org.uk/policy/Documents/NRPF_national_picture_final.pdf

²⁰ <https://www.nao.org.uk/naoblog/local-government-in-2019/>

²² Letter addressed to Rt Hon Priti Patel on 30 March 2020, signed by 28 members of Step Up Migrant Women UK

exemptions to the household isolation policy for victims of domestic abuse, a coalition of more than 40 BME and migrant specialist frontline services, called on the Home Secretary to abolish the NRPF condition and to ease other immigration restrictions.²² Our call remains unanswered.

25. On 21 April, in her reply to the demand to lift the NRPF condition in the context of the pandemic by the Home Affairs spokesperson for Liberal Democrats Party, Christine Jardine, the Home Secretary Priti Patel responded as follows:

‘Migrants with leave under the Family and Human Rights routes can...apply to have the restriction lifted by making a ‘change of conditions’ application if there has been a change in their financial circumstances’. The Home Secretary offered that the application form ‘has been recently digitised to make sure it is accessible for those who need to remain at home, and decisions are made on a case-by-case basis’; saying ‘applications are being dealt with swiftly and compassionately.’²³

26. This response is misleading since the ‘Change of Conditions’ application is available only for people granted leave to remain on the basis of family or private life, who are ‘destitute or have compelling reasons relating to the welfare of their child on account of very low income, or with exceptional circumstances relating to their financial circumstances.’²⁴ It does not apply to all abused migrant women with NRPF, who remain subject to restrictions.²⁵ Furthermore, in the current crisis it is simply unrealistic to expect vulnerable migrant women who are destitute, who have no resources, often no means of communication and do not speak English, to make applications that can take a month or more to process without any certainty of being successful. The response illustrates the lack of a crisis response to domestic abuse for migrant women and the refusal of the Government to end what has been a ‘hostile environment’ immigration agenda.

27. On 21 May 2020, [the High Court ruled that the NRPF policy](#)¹ does not adequately recognise the Government’s obligation to ensure the NRPF condition is not applied, or is lifted, where a person is at imminent risk of suffering inhuman or degrading treatment (contrary to Article 3 of the European Convention of Human Rights) by being prohibited from accessing public funds. This followed a legal challenge brought by a child supported by the Unity Project (which supports migrant families facing destitution as a result of the NRPF policy). Important as this case is, it only impacts on migrant families with NRPF who can no longer work - it does not extend to the cohort of women we support. It also shows that legal challenges have been the only way to force the Government to shift its position on migrants during the pandemic.

²² Letter addressed to Rt Hon Priti Patel on 30 March 2020, signed by 28 members of Step Up Migrant Women UK

²³ <https://www.politicshome.com/news/article/excl-anger-as-priti-patel-stands-by-universal-credit-curbs-for-migrants-amid-coronavirus-crisis>

²⁴ <https://www.gov.uk/government/publications/application-for-change-of-conditions-of-leave-to-allow-access-to-public-funds-if-your-circumstances-change>

²⁵

<https://static1.squarespace.com/static/590060b0893fc01f949b1c8a/t/5c054306aa4a99fb2c3e62e3/1543848712194/Self-help+Guide+to+Making+a+%27Change+of+Conditions%27+Application+-+Dec+2018+%281%29.pdf>

28. On 12 June, local authorities across the UK, represented by the Local Government Association, called on the Government to suspend the NRPF policy for the duration of the pandemic, due to concerns about the potential scale of homelessness and destitution. Yet the harmful policy still remains.²⁶ There has simply been no response to this.

Hostile environment policies

29. There have also been no exemptions for abused migrant women in terms of existing data-sharing agreements and the embedding of immigration enforcement in statutory services – policies that have been pursued for many years and which have gradually accelerated. These measures, along with the NRPF policy, make up the Government’s ‘hostile environment’ strategy for migrants and in effect, restrict migrant women from escaping abusive households. Our years of frontline experience show that women with insecure immigration status are too afraid to report their experiences of abuse to the police for fear of retribution from perpetrators or their families and from the state, in the form of detention and deportation. In 2019, in a survey of 50 migrant women subject to gender-based violence, almost two-thirds (62%) of women said their partners had threatened them with deportation should they report the violence. More than half of the women surveyed feared that they would not be believed by the police because of their immigration status (54%) or that the police or the Home Office would support the perpetrator over them (52%).²⁷
30. The practice of data-sharing between the police and the Home Office when victims report abuse is currently the subject of a joint super-complaint by SBS and the civil liberties organisation, Liberty²⁸. We stated:

“In some cases, [abused migrant women] are subjected to an immigration investigation by the police or even arrested, cautioned and detained and even charged with immigration offences, rather than assisted as victims of domestic abuse. It would seem from many of the cases that we have encountered that the police’s overwhelming concern is not the safety and well-being of the women or any children involved but whether or not they are lawfully in the UK. More often than not, no account is taken of the fact that many of these women have a right to make an application to regularise their stay as victims of domestic abuse, but have never had the opportunity to do so or obtained the support needed because they are trapped in abusive marriages or relationships due to fear of and intimidation by their perpetrators; who use their immigration status to exert absolute control over them.”

31. The policy of data-sharing has also led to legal proceedings brought by an SBS user against the Metropolitan Police in London.

²⁶ <https://www.theguardian.com/uk-news/2020/jun/12/councils-ask-for-uk-to-lift-bars-on-emergency-help-for-migrants>

²⁷ <https://stepupmigrantwomenuk.files.wordpress.com/2019/05/the-right-to-be-believed-full-version-updated.pdf>

²⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/767396/Super-complaint_181218.pdf

32. The embedding of immigration surveillance in all public and essential services, including healthcare²⁹, schools³⁰, housing³¹ and emergency services, means that many abused migrant women are effectively trapped at home during the pandemic – and cannot benefit from the wider exemptions from the ‘stay at home’ guidance applied to other domestic abuse victims.

Are shelters open and available? Are there any alternatives to shelters available if they are closed or without sufficient capacity?

33. Refuge (shelters) have remained open, however they have had limited capacity and the majority of migrant women with NRPF are unable to gain access to them. Although this was also the case prior to the pandemic, the lack of spaces has since become even more acute.

34. The UK entered the Covid-19 crisis with insufficient refuge spaces for women escaping abuse. As far back as 2017, in England, there was a 30% shortfall in the number of refuge spaces compared to the minimum amount recommended by the Council of Europe.³² Of that total, there was an average of just one vacancy per region for a woman with NRPF. Women’s Aid statistics for 2019/20 show that in one year, almost 4 in 5 BME women were turned away from refuges due to their immigration status and NRPF.³³ For these reasons, SBS has long had to resort to housing incredibly vulnerable women in Bed & Breakfast accommodation using our own financial resources, even though this is a highly unsatisfactory and unsafe measure.

35. Many refuges suspended new referrals within the first few weeks of the lockdown for a variety of reasons, including a reduction in staff numbers, the need to safeguard other residents and due to the lack of available ‘move-on’ accommodation. Refuge providers have described the challenges of housing new women when some of the existing residents are self-isolating in the premises. The average number of UK-wide refuge vacancies listed on Women’s Aid’s ‘Routes to Support’ database for example, dropped by around 55% in April 2020³⁴ and on 14 April, Solace Women’s Aid reported that its 23 refuges across London were completely full.³⁵

36. The circumstances outlined above have left many migrant women without access to safety. In one case on 22 April, we were contacted by a support worker from a domestic abuse service in South West England, who was supporting a woman who had to flee her home due to domestic abuse. They were seeking our advice about on how to find safe accommodation for the woman as she had NRPF. The organisation had made an application on her behalf for the

²⁹ <http://www.docsnotcops.co.uk/about/>

³⁰ <https://www.schoolsabc.net/>

³¹ <https://www.theguardian.com/uk-news/2019/mar/01/right-to-rent-scheme-ruled-incompatible-with-human-rights-law>

³² <https://1q7dqy2unor827bqjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2020/01/The-Domestic-Abuse-Report-2020-The-Annual-Audit.pdf>

³³ <https://1q7dqy2unor827bqjls0c4rn-wpengine.netdna-ssl.com/wp-content/uploads/2020/06/Nowhere-to-Turn-2020.pdf>

³⁴ Update from Woman’s Aid during weekly sector meeting hosted by the Domestic Abuse Commissioner (27 April 2020)

³⁵ <https://www.theguardian.com/society/2020/apr/14/fiona-dwyer-2m-for-coronavirus-domestic-abuse-victims-its-pitiful>

DDVC on 20 April so that she could access a refuge space, but they were still waiting for its confirmation. In the meantime, the local council had given her temporary accommodation in a hotel with other street homeless people in an area that was in close proximity to the perpetrator she was escaping. The woman was at considerable risk of harm and the domestic abuse service was worried for her safety. Despite these concerns, other refuges outside the area were refusing to accept her due to the NRPF condition.

SBS' campaign for emergency accommodation

37. In anticipation of cases such as these and in the absence of any national plan of action from government, on 27 March, SBS and the organisation Compassion in Politics decided to take action to resolve the urgent need for emergency crisis accommodation. We wrote a letter to a number of leading hotel chains requesting accommodation for women and children fleeing abuse, including migrant women with insecure immigration status. This call was supported by over 30 organisations from the VAWG sector,³⁶ as well as the Chair of the APPG on Domestic Violence and Abuse, Jess Phillips MP, the London Victim's Commissioner, the Victim's Commissioner and the Domestic Abuse Commissioner. We received an immediate and overwhelmingly positive response from large hotel chains and hostel providers, who offered a selection of accommodation options across the UK at hugely subsidised rates, in recognition of the difficult and dangerous circumstances that abused women faced in the crisis.
38. On 9 April, we wrote to Chancellor of the Exchequer and the Home Secretary, urging them to underwrite the costs of the hotel and hostel accommodation offered to the VAWG sector.³⁷ The letter highlighted the fact that at that time, 12 women and children had been killed by partners or family members since the lockdown. We also referenced similar schemes that had already been established internationally, including in France³⁸ and Australia.³⁹ Our letter was again supported by over 30 organisations and was also endorsed by the Deputy Mayor for Policing and Crime in London. Between 24-27 April, a survey commissioned by Amnesty International found that of the 2000 people surveyed, 70% of the public supported the Government funding hotel rooms for domestic abuse victims.⁴⁰
39. We have not received a direct a response to our letter from either the Home Secretary or the Chancellor. As a consequence, on 27 April we launched a legal challenge against the Ministry for Housing, Communities and Local Government,⁴¹ for the failure to provide emergency funding for adequate accommodation for domestic abuse survivors during the Covid-19 crisis. We argued that this failure constituted unjustified discrimination towards women, contrary

³⁶ <https://southallblacksisters.org.uk/wp-content/uploads/2020/03/Letter-to-hotel-from-VAWG-sector-Friday-27-March-2020.pdf>

³⁷ <https://southallblacksisters.org.uk/wp-content/uploads/2020/04/Letter-to-Rt-Hon-Rishi-Sunak-MP-from-SBS-and-Compassion-in-Politics-9-April-2020.pdf>

³⁸ <https://www.france24.com/en/20200330-france-to-put-domestic-violence-victims-in-hotels-as-numbers-soar-under-coronavirus-lockdown>

³⁹ <https://www.independent.co.uk/news/world/australasia/coronavirus-homeless-housing-hotels-australia-rough-sleepers-five-star-perth-a9437966.html>

⁴⁰ <https://www.amnesty.org.uk/press-releases/uk-72-uk-think-more-should-be-done-protect-all-domestic-abuse-victims>

⁴¹ <https://southallblacksisters.org.uk/press-releases/press-release-hotel-chains-womens-charities-urge-government-to-help-women-escape-abuse/>

to Article 14 of the European Convention on Human Rights, and was unlawful and in breach of the public-sector equality duty contained in the Equality Act 2015 s 149.

40. On 2 May 2020, two days before a reply to our letter was due, the Secretary of State for Housing, Communities and Local Government announced a £76 million package to support the ‘most vulnerable in society’ during the pandemic. He stated that a proportion of the fund would go to charities that address domestic abuse.⁴² Of that total, £10 million was provided by the Ministry for Housing Communities and Local Government (MHCLG) to distribute to charities that operated domestic abuse safe accommodation services. We were informed that: “Where refuges do not have enough existing capacity to support those in need as a result of domestic abuse the funding will also enable refuges to make available hotels or other temporary accommodation to survivors of domestic violence where they judge it to be safe and appropriate to do so.” A further £25m was announced for the Ministry of Justice, and £3m for the Home Office.⁴³ Of the total, approximately a paltry £1.5m has been earmarked for support for migrant women. A figure that is nowhere near sufficient to meet the accommodation and subsistence costs of thousands of migrant women. In addition, no funds were ringfenced for BME specialist services, as had been requested by the VAWG sector.⁴⁴
41. We remain concerned that the Government’s funding announcements have made no explicit reference to either the need to support migrant women with NRPF or the need for ring-fenced funding for BME specialist services. Consequently, there is an ongoing risk for abused migrant women with NRPF during the pandemic, and it may be some time before we uncover the extent of harm caused.
42. As an alternative measure, we worked with a women’s refuge in London (Solace Woman’s Aid) to establish an emergency hotel bed scheme for abused women for a three-month period in London, with funding provided by the Mayor’s Office for Policing and Crime (MOPAC) in London (see paragraph 54 for more details). This follows a similar initiative established by MOPAC for homeless people in London towards the end of March.⁴⁵ Even with this arrangement however, we struggled to secure 20 out of 70 spaces for women with NRPF who were regarded as too much of a risk compared with other women, because of the uncertainty around obtaining ‘move-on’ accommodation for them by the time the scheme ended. The reality is that within the first fortnight of the project, these spaces for women with NRPF were full – which indicates the serious level of unmet need amongst abused migrant women with insecure immigration status in the UK.

⁴² <https://www.bbc.co.uk/news/uk-52516433>

⁴³ <https://www.gov.uk/government/news/emergency-funding-to-support-most-vulnerable-in-society-during-pandemic>

⁴⁴ <https://www.endviolenceagainstwomen.org.uk/joint-statement-on-emergency-funding-from-violence-against-women-girls-sector/>

⁴⁵ <https://www.theguardian.com/world/2020/mar/27/councils-told-to-house-all-rough-sleepers-in-england-by-weekend>

Are protection orders available and accessible in the context of the COVID-19 pandemic?

43. Protection orders are still available in the UK, and courts are still hearing emergency applications for non-molestation and occupation orders, and other protection orders. These orders are sought by women or the police and are designed to be processed quickly. However, in the absence of any coordinated strategy, there is inconsistency in their application and implementation. SBS has been able to assist some women in obtaining these protection orders, partly because of our expertise and experience as a BME specialist organisation; and partly because the local police have been able to divert their resources to responding to domestic abuse due to a fall in crime elsewhere. Nationally however, it is a mixed picture. The National Police Chief Council has recorded a 3% increase in domestic abuse cases, which appears to have had an impact on their ability to obtain protection orders.⁴⁶ The independent Domestic Abuse Commissioner has also reported that some police forces are currently struggling to operationalise these orders due to the lack of an alternative address for perpetrators. Some court closures are also impeding women's ability to obtain court orders. There are reports that some judges are hesitant to issue Domestic Violence Protection Orders and Notices (DVPOs/DVPNS) to the police due to concerns about the lack of appropriate alternative accommodation for the perpetrator and the fear that this will lead to the breach of such orders by perpetrators; who may return home and put survivors at further risk of harm.⁴⁷
44. On 27 April, the Parliamentary Home Affairs Select Committee recommended that local authorities should ensure that any domestic abuse action plans include provision for temporary alternative accommodation for perpetrators when DVPOs are sought.⁴⁸ However, there remains no overarching oversight by central Government to ensure that these protection orders are being obtained and operationalised appropriately.

What are the impacts on women's access to justice? Are courts open and providing protection and decisions in cases of domestic violence?

45. We have been particularly concerned about women's access to the private law family proceedings, especially in relation to child contact. Children proceedings are often used by abusers as a means by which to exert control over survivors of abuse. In the context of the pandemic, our experience shows that perpetrators have used Covid-19 as a pretext to manipulate and abuse child contact arrangements. For example, we have had cases of perpetrators not returning children to their mothers after contact, on the basis that they were merely attempting to control the spread of the virus. This is echoed by other organisations who have reported accounts of perpetrators refusing to allow children contact with mothers who are key workers on the basis that their jobs are putting the children at risk. Others have reported that perpetrators are using the pandemic to continue their abuse by intentionally placing children at risk, or insisting on contact arrangements continuing contrary to

⁴⁶ <https://committees.parliament.uk/writtenevidence/2134/pdf/>

⁴⁷ <http://driveproject.org.uk/wp-content/uploads/2020/05/Accommodation-for-Perpetrators-of-DA-Emerging-Issues-and-Responses-May-2020.pdf>

⁴⁸ https://publications.parliament.uk/pa/cm5801/cmselect/cmhaff/321/32106.htm#_idTextAnchor055

Government guidance; or issuing enforcement applications unreasonably as a form of harassment.⁴⁹

46. On 19 March, The President of the Family Division and the Head of Family Justice, Sir Andrew McFarlane, published guidance, stating that the default position should be for all Family Court hearings to be undertaken remotely and that a court-based hearing should only take place where the 'requirements of fairness and justice require a court-based hearing, and it is safe to conduct one'.⁵⁰ However, this has impacted on the majority of poor migrant women who do not have access to resources that allow for such remote engagement.
47. In the UK, there are 1.9 million households without internet data⁵¹, however the transition to remote hearings has not been accompanied by any national scheme to ensure that everyone is able to participate remotely. In order to support women's participation in child contact proceedings, we have been compelled to facilitate women's engagement by ensuring they have access to phones, PCs and the internet. Without this support, many women would simply would not be able to seek the protection and legal remedies that they need.
48. Covid-19 and the resulting lockdown has also left many survivors struggling to access legal aid. Whilst the Government has relaxed the evidential requirements needed to qualify for legal aid, it has left intact the 'gateway criteria' for obtaining legal aid. This means that if women are unable to provide evidence of abuse because they have not been able to report it to various agencies, they are still barred from obtaining legal aid. The Government has not heeded calls to suspend the 'gateway criteria' during the lockdown as recommended by the Home Affairs Select Committee.⁵²

What are the impacts of the current restrictive measures and lockdowns on women's access to health services? Please specify whether services are closed or suspended, particularly those focusing on reproductive health.

49. We have not been privy to concerns about women's access to reproductive services in the context of Covid-19, but our primary concern remains the deterrent effect of immigration enforcement that is now embedded in the healthcare and indeed the wider welfare and criminal justice system. This is particularly problematic for migrant women seeking to escape abuse. The Department of Health and Social Care has refused to introduce a firewall between the NHS and the Home Office, including for those people with a confirmed coronavirus diagnosis. This contrasts with the response of the Department for Justice and Equality in Ireland, which gave an assurance within the first few weeks of the outbreak by stating that 'there will be no data sharing between Government departments on undocumented migrants during the Covid-19 pandemic.'⁵³ In a context where abused migrant women are likely to be

⁴⁹ Rights of Women (2020) Coronavirus and child contact arrangements. <https://rightsofwomen.org.uk/get-information/family-law/coronavirus-and-child-contact-arrangements/>

⁵⁰ <https://www.judiciary.uk/wp-content/uploads/2020/03/Presidents-Guidance-Covid-19-2.pdf>

⁵¹ <https://www.theguardian.com/world/2020/apr/28/digital-divide-isolates-and-endangers-millions-of-uk-poorest>

⁵² <https://committees.parliament.uk/publications/785/documents/5040/default/>

⁵³ https://fra.europa.eu/sites/default/files/fra_uploads/ireland-report-covid-19-april-2020_en.pdf

isolated and without access to resources and networks of support, these data-sharing agreements constitute a formidable barrier to reporting abuse because a key route to reporting that abuse – through health services – is effectively not available.

Please provide examples of obstacles encountered to prevent and combat domestic violence during the COVID-19 lockdowns.

50. The overarching barrier to preventing and combatting domestic violence during the Covid-19 lockdown has been the lack of a crisis response that is co-ordinated at the highest levels of government. This has means that not all women and children who face abuse in the UK have effective routes to safety, irrespective of their background or immigration status.⁵⁴ Despite long-standing evidence from around the world concerning the increased risk and escalation of domestic abuse during periods of crisis, the Government has failed to implement a UK-wide coordinated strategy on the prevention of domestic abuse as part of its response to Covid-19. For example, the independent Domestic Abuse Commissioner and Victims' Commissioner were not invited to relevant planning and coordination groups on Covid-19, particularly the Covid-19 ministerial group or relevant COBRA meetings. Also, the VAWG sector, including BME specialist services, were not consulted or given advance notice of the Government's plans so that we could prepare for the impact on vulnerable women and children. Further, the Impact Assessment for the Coronavirus Act states that an equalities assessment was "carried out separately, as part of the Public Sector Equalities Duty", however this assessment has not yet been published.⁵⁵ On 6 April 2020, SBS, as part of a coalition of over 20 VAWG organisations sent a letter to the Prime Minister calling for a clear national strategy to protect women and girls and prevent abuse during the pandemic - the letter remains unanswered.⁵⁶
51. Post-lockdown, whilst the Government has since taken some steps to redress gaps in protection for women, for example through the announcement of funding initiatives, the response has been staggered and piecemeal. The refusal to ease any immigration restrictions for migrant women in particular has demonstrated that immigration control and enforcement remains a priority over the need to protect all women and girls from abuse. Inevitably, the NRPF policy and cumulative 'hostile environment' policies have heightened the risk that migrant women face, trapping them in abusive and dangerous environments.

Please provide examples of good practices to prevent and combat violence against women and domestic violence and to combat other gendered impacts of the COVID-19 pandemic by Governments.

52. In the course of the pandemic, we have witnessed examples of good practice internationally to prevent and combat violence against women. These include:

⁵⁴ https://www.basw.co.uk/system/files/resources/basw_90706-2_0.pdf

⁵⁵ <https://publications.parliament.uk/pa/cm5801/cmselect/cmwomeq/correspondence/Letter-from-Chair-to-Liz-Truss-MP-re-Covid-19-equalities-assessment.pdf>

⁵⁶ An Open Letter to the Prime Minister, April 2020: <https://www.womensaid.org.uk/wp-content/uploads/2020/04/An-open-letter-to-the-prime-minister.pdf>

- In Portugal, until at least 1 July, the Government will consider all foreign nationals with pending immigration applications as having the rights associated with permanent resident status. The concession is intended to ensure that migrants have access to public services, including healthcare, welfare benefits, bank accounts and rental contracts.⁵⁷
- In Ireland, the Department for Justice and Equality in Ireland gave assurances within the first few weeks of the Covid-19 outbreak that ‘there will be no data sharing between Government departments on undocumented migrants during the Covid-19 pandemic.’⁵⁸
- In France, the Government accommodated domestic abuse victims in hotels and has set up support in shopping centres and alert systems in pharmacies nationwide.⁵⁹
- In Italy, a public prosecutor in Trento mandated that perpetrators of assault will have to leave their homes rather than their victims.⁶⁰

53. But there was nothing similar initiated in the UK until campaigns and legal action were launched due to the failure of the UK government in providing a crisis response.

Please provide examples of good practices to prevent and combat violence against women and domestic violence and to combat other gendered impacts of the COVID-19 pandemic by NGOs and NHRIs or equality bodies.

54. As we have outlined in paragraph 42, in order to redress the gap in protection for women during the pandemic, SBS in association with a refuge, Solace Women’s Aid, was compelled to establish emergency hotel accommodation for women in London, funded by MOPAC.⁶¹ This project is coordinated and led jointly by both organisations and consists of the provision of 70 spaces for any woman and children escaping abuse in the capital. All residents are provided with three meals a day and supported by domestic violence advocates for the duration of their stay. Significantly, 20 of the 70 spaces have been reserved for migrant women with NRPF, who are also assisted through advocacy, counselling and support group work. Unfortunately, this successful model has not been replicated across the UK.

55. The following case study demonstrates the impact on a migrant woman with NRPF, who was housed and supported by our crisis hotel project. But for the help that she received, she would have either remained in an abusive marriage or rendered destitute and at risk of other forms of harm:

“My husband and I married in India, and I came to the UK in 2017 on a spousal visa. After arriving in the UK, my husband and his family started to abuse me. My husband would ignore me sometimes, and put me down. He had a dominant personality and would drink often, and

⁵⁷ <https://commonslibrary.parliament.uk/research-briefings/cbp-8888/>

⁵⁸ https://fra.europa.eu/sites/default/files/fra_uploads/ireland-report-covid-19-april-2020_en.pdf

⁵⁹ <https://www.france24.com/en/20200330-france-to-put-domestic-violence-victims-in-hotels-as-numbers-soar-under-coronavirus-lockdown>

⁶⁰ https://www.vice.com/en_uk/article/y3mj4g/france-is-putting-domestic-abuse-victims-in-hotels-during-coronavirus-lockdown

⁶¹ <https://southallblacksisters.org.uk/news/sbs-and-solace-launches-covid-19-crisis-project/>

be violent. I would try to speak to my mother-in-law about her son's behaviour but she would defend him, and told me it's my destiny.

My husband was not working – partly because of Covid-19, but he has had long-term issues with staying in employment. The lockdown made it worse. His business opportunities were suffering and the news of the pandemic was on 24/7. My husband started drinking a lot more after lockdown, so he got more aggressive with me. Sometimes he'd start drinking in the morning, he'd wake up and start to drink before even having breakfast – that was stressful for me. I would think to myself: If I have to move out from the house, where would I go? I had no clue about social organisations in the UK, as I came from abroad. I cannot return to India. If I go back to India I will suffer lots of abuse from my mother and brother. I had a disturbed family life – I raised my siblings and I left for another country as soon as I could.

I'd suffered a lot of domestic abuse even before the lockdown but after the lockdown, things went completely out of hand and became impossible. That's when I had to leave.

I came to SBS with £4 in my account and in tears. I am overwhelmed by how they have helped me - I couldn't ask for more support. They have provided me with emotional support, they have checked in on me every day. I would have been in the streets or suffered more domestic abuse if it was not for SBS. Now I'm [in the emergency accommodation] at a further distance from my matrimonial home, meaning I have more independence and can move about freely in the local area with less fear. I am safe here. SBS gives me money to buy food and helped me apply for the Destitution Domestic Violence Concession, which came through recently. I have also been assisted in applying for universal credit which I have been told will be paid next month. I will be referred to an immigration solicitor who will support me to apply for Indefinite Leave to Remain under the Domestic Violence Rule. If successful, I will be able to stay in the UK independently. I am really looking forward to that day because it will give me the foundation I need to get on with my life. I don't know what I would have done if SBS didn't exist. “

56. Since 2009, SBS has also operated a No Recourse Fund (NRF) project, funded by the Tampon Tax funds and London Councils, to provide immediate housing and subsistence support to women (and their children) with NRPF who also face gender-based violence. Over the course of the pandemic, we have accelerated our fundraising efforts to ensure that we can provide emergency accommodation and subsistence to all migrant women and children who need it; and to extend our provision of support to our existing users; who are experiencing greater levels of isolation and poor mental health.

Please send any additional information on the impacts of the COVID-19 crisis on domestic violence against women not covered by the questions above

The disproportionate impact of Covid-19 on the BME specialist sector

57. The Covid-19 pandemic has had a disproportionate impact on the BME specialist women's sector, which is likely to have long-term effects on BME and migrant women's access to

specialist advice and support in the future, when things ‘return to normal’.⁶² Inequality in access to appropriate support for specialist services had already been curtailed by a decade or more of austerity measures prior to the crisis, which has led to the shrinking of BME specialist services and in some cases to their closure, creating a strain on those that have survived. The current crisis has compounded the problem.

58. There is ample evidence to show that the unique support pathways provided by BME specialist VAWG organisations are highly valued by BME women. They are essential in addressing all forms of abuse against BME and migrant women, who are ‘under-served’ by mainstream services.⁶³ However, austerity measures and commissioning processes have disadvantaged BME specialist services because they have privileged larger, more resourced generic and corporate providers. The structural disadvantage experienced by the specialist sector is demonstrated by data which shows that the combined income of 15 BME specialist women’s support services is less than the income of one single mainstream support service in the VAWG sector.⁶⁴ In 2008/2009, SBS engaged in a sustained and protracted struggle that involved a legal challenge to save our own specialist organisation, which was the only provider of domestic abuse services to BME women in Ealing. This followed a decision by Ealing Council to fund a single generic service for domestic abuse for all women in the borough.⁶⁵ The development was an early warning sign of what was to follow. Between 2014 and 2016, local authority funding for BME specialist organisations fell from 30% to almost zero percent and the BME specialist sector is now largely reliant on one key source of funding - the Big Lottery Fund.⁶⁶
59. What this means is that many BME specialist services entered the current crisis in an already precarious financial position. As a consequence, anecdotal evidence suggests that many BME and migrant women struggle to access appropriate services in their area – there are only around 30 specialist refuges BME women in England, which are mainly concentrated in London.⁶⁷
60. The crisis has also meant that many BME specialist organisations, including refuges, helplines and community-based services, are having to incur considerable additional costs (particularly in relation to IT infrastructure) as a result of the need to move to home-working in line with government guidance on social distancing. However, many smaller BME specialist services have no access to IT facilities and other resources needed to adapt their delivery model.

⁶² https://829ef90d-0745-49b2-b404-cbea85f15fda.filesusr.com/ugd/2f475d_6d6dea40b8bd42c8a917ba58ceec5793.pdf

⁶³ https://829ef90d-0745-49b2-b404-cbea85f15fda.filesusr.com/ugd/f98049_1a6181417c89482cb8749dbcd562e909.pdf

⁶⁴ Imkaan (2018) Summary of the Alternative Bill: From the Margin to the Centre Addressing Violence Against Women and Girls: <https://www.imkaan.org.uk/alternative-bill#:~:text=%22The%20Alternative%20Bill%20provides%20a,%2C%20border%20violence%2C%20and%20pove%20rty.>

⁶⁵ <https://southhallblacksisters.org.uk/campaigns/save-sbs-campaign-2008/>

⁶⁶ <https://publications.parliament.uk/pa/jt201719/jtselect/jtddab/2075/207508.htm>

⁶⁷ <https://publications.parliament.uk/pa/jt201719/jtselect/jtddab/2075/207508.htm>

61. Moving to telephone and online services has been financially and practically challenging for groups like SBS in contexts where we know that first generation BME and migrant women in particular will struggle to access our services. Many do not have the resources or knowledge or ability to contact agencies like ours remotely. A significant number rely on 'walking-in' and face-to-face contact as the main route to accessing our services. They often get to know of us by word of mouth and simply turn up at our door. For reasons to do with a greater lack of resources, lack of English, lack of trust in the welfare and legal system, inability to navigate their way through information online and fear of deportation, these women are arguably one of the key groups in society that are dependent on face-to-face access for support. Reaching out to this group and finding ways of maintaining their access has therefore been particularly challenging.
62. BME specialist services like ours, have incurred additional costs in order to maintain critical access to our services. As previously outlined, in response to the lockdown, SBS has increased counselling, advocacy and outreach services including carrying out more welfare checks on existing and new users. Our regular activities now take longer than normal to complete, such as taking statements, gathering evidence and providing much needed legal and other support.
63. In the course of the pandemic, the Government's funding announcements to date through the MHCLG, the MoJ and the Home Office are yet to reach frontline services, and it remains uncertain as to whether any of this funding will reach BME specialist services in any meaningful way - they will certainly exclude migrant women with NRPF for the most part. Unless the Government provides significant and sustainable funding; and strategies to redress these issues, we fear that the long-term impact of the pandemic on the vital BME specialist sector and therefore on BME and migrant women will be immense. The ongoing failure on the part of the Government to provide a more substantive response to the issue of domestic abuse and Covid-19 means that we are seeing a widening of the already considerable inequalities that exist in accessing safety and justice for the most disadvantaged in our society.

Southall Black Sisters
24 June 2020