

Migrant Victims of Domestic Abuse: A critical appraisal of evidence from the Home Office Review

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**A report prepared for the Office of the
Domestic Abuse Commissioner**

DISCLAIMER

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Abbreviations and Terms

Term	Meaning/application
VAWG	Violence Against Women and Girls
HOR	Home Office's Review on Migrant Victims of Domestic Abuse, published in June 2020
DAC	Office of the Domestic Abuse Commissioner
DACR	Domestic Abuse Commissioner's Independent Review of HOR
DDVC	Destitute Domestic Violence Concession
LAWRS	Latin American Women's Rights Service
S4S	Safety4Sisters North West
SBS	Southall Black Sisters
SUMW	Step Up Migrant Women
Stakeholders	<p>Stakeholders are individuals or organisations who have an interest in a subject and can meaningfully contribute to discussion and decision-making on it, as they have relevant experience, knowledge and/or expertise</p> <p>In the case of the DACR, this term refers to the VAWG expert sector organisations who submitted evidence to the Home Office Migrant Review, and this was the term employed in the Home Office Migrant Review to describe them. The DACR researchers use the terms 'stakeholders' and 'expert sector organisations' interchangeably to describe those who submitted evidence to the Home Office Migrant Review.</p>
Triangulate/triangulated/triangulation	Triangulation is a research strategy which involves considering, cross-referencing, and comparing the evidence from multiple data sources, methodological approaches, theoretical perspectives and/or researchers
Terms of Reference (ToR)	A formal document which outlines the context, aims, objectives and parameters of a piece of work, as well as delineating team roles, responsibilities and expected outputs. The ToR can cover one or more stages or components of a project, and provides guidance for contributors
Code/coding/coded	<p>In qualitative research, a code is a type of shorthand or label that researchers use to describe, categorise and analyse data</p> <p>For example, as part of the DAC Review, researchers created the code 'Expertise by experience' to flag the use of service user testimony and narratives across stakeholder evidence submissions and the HOR. Codes can be either 'deductive' or theory-driven – developed prior to data analysis – or 'inductive' or data-driven, developed during</p>

	data analysis. Some studies employ a hybrid approach, using both forms of coding
Transparency/auditability	Methodological transparency/‘auditability’ is a research norm or standard, according to which researchers are expected to make the “data, analysis, methods, and interpretive choices underlying their claims visible in a way that allows others to evaluate them” ¹ , retrace their steps if desired and draw their own (informed) conclusions
Experiential evidence	Practitioners’ experiences and expertise constitute a form of data that can support and contribute to evidence-informed policy and practice (Dabby 2017 ²)
Contextual evidence	Victims’ experiences, values and expectations constitute a form of data that can support and contribute to evidence-informed policy and practice (Dabby, 2017)
Trustworthiness	Qualitative research is appraised as trustworthy in relation to several key criteria: <ul style="list-style-type: none"> • Credibility – the findings are credible, clearly justified by the evidence presented and based on a plausible interpretation of the data • Transferability – the findings are richly described and of wider relevance; they can be extrapolated or applied to other contexts and groups of people • Dependability/confirmability – the process for collecting and interpreting the evidence is consistent, appropriate and clearly explained • Reflexivity – the researcher critically reflects on, and takes into account, their own biases, perspective and values³
Value	The evidence presented or described contributes to the conversation; it fills in or addresses gaps in the evidence; it amplifies marginalised or neglected voices and viewpoints. Additionally evidenced/measured for the purposes of the DACR by looking at frequency of citation across expert sector evidence submissions
Relevance	The evidence presented or described is relevant to the subject (in this instance, the needs of migrant victims and barriers to accessing safety, support and justice)

¹ Moravscik, A. (2019). *Transparency in Qualitative Research*

<https://www.princeton.edu/~amoravcs/library/TransparencyinQualitativeResearch.pdf>

² Dabby, C. (2017). *The A to Z Advocacy Model: Asians and Pacific Islanders Build an Inventory of Evidence-Informed Practices*. Oakland CA: Asian Pacific Institute on Gender-Based Violence. <https://s3.amazonaws.com/gbv-wp-uploads/wp-content/uploads/2018/11/16233433/A-Z-AdvocacyModel-2017.pdf.pdf>

³ Korstjens, I. & Moser, A. (2018). ‘Series: Practical guidance to qualitative research. Part 4: Trustworthiness and publishing’, *European Journal of General Practice*, 24:1, 120-124, DOI: 10.1080/13814788.2017.1375092

Context	The evidence presented or described is clearly placed in context; the context in which the research was carried out is relevant to the context to which the findings are being applied or extrapolated
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1 Executive Summary

The purpose of this review (hereafter, DAC Review/DACR) is to consider and assess the evidence that informed the Home Office Migrant Victims of Domestic Abuse Review (HOR). This review was commissioned by the Office of the Domestic Abuse Commissioner (DAC). The review was carried out between March - April 2021 by Dr Olumide Adisa and Dr Katherine Allen at the University of Suffolk’s Centre for Abuse Research.

By reviewing the body of evidence submitted to the HOR before June 2020, researchers identified key findings and recurrent themes within the evidence that informed the conclusions drawn by the Home Office. Additionally, by triangulating (cross-referencing and supporting/substantiating) the evidence submitted and referenced by the sector, while comparing the sector’s use and interpretation of evidence to the HOR, researchers were able to evaluate the credibility of the HOR conclusions regarding gaps and insufficiencies within the evidence. Researchers also reviewed the initial ToR provided by the Home Office and the methodological approach taken, framing several recommendations for improving the effectiveness of future evidence-gathering and collaboration with stakeholders.

1.1 Background & Context

The DACR forms one strand of a wider project undertaken by the DAC to improve provision for migrant victims of domestic abuse. The DACR emerged in the context of the passage of the Domestic Abuse Act through Parliament, with particular relevance to proposed amendments to the Bill to safeguard the rights and interests of migrant victims, and the Home Office’s response to these recommendations.

In February 2017, the Prime Minister announced plans for an ambitious programme of work designed to transform responses to domestic abuse, culminating in the introduction of a new Domestic Abuse Bill⁴. In March 2018, the Westminster Government undertook a consultation to elicit feedback on the legislative proposals set out in the draft Bill⁵. The consultation was designed to “harness the knowledge and expertise of victims and survivors, support organisations and research experts [as well as] professionals across policing, criminal justice, health, welfare, education and local authorities” (HM Government, 2018: 8).

⁴ Home Office (2017). *Prime Minister's plans to transform the way we tackle domestic violence and abuse* [Press release] 17/02/2017. Available at: <https://www.gov.uk/government/news/prime-ministers-plans-to-transform-the-way-we-tackle-domestic-violence-and-abuse> (Accessed: 15 May 2021)

⁵ HM Government (2018) *Transforming the Response to Domestic Abuse: Government Consultation*. Available at: https://consult.justice.gov.uk/homeoffice-moj/domestic-abuse-consultation-sign-version/supporting_documents/Transforming%20the%20response%20to%20domestic%20abuse.pdf (Accessed 01 April 2021)

The consultation received over 3,200 responses from across the UK. Following this consultation, the government convened a Joint Committee to undertake pre-legislative scrutiny of the draft Domestic Abuse Bill. The issues raised by the Joint Committee recommendations were premised on the fact that the Domestic Abuse Bill “missed the opportunity to address the needs of migrant women who have no recourse to public funds” (HOR, S.1). These recommendations triggered the Home Office response and commitment to undertake a review of the “overall response for migrant victims of domestic abuse” (HOR, S.2), which then led to the Migrant Victims of Domestic Abuse Review (HOR).

The main recommendations made by the Joint Committee included the extension of the Destitute Domestic Violence Concession (DDVC) from three to six months, extending support for migrant victims under the Domestic Violence Indefinite Leave to Remain immigration route (DVILR), and the establishment of a ‘firewall’ at the level of policy and practice to separate reporting of crime and access to support services from immigration enforcement. These proposed measures were designed to address the barriers to reporting and accessing safety and support that some migrant victims face, contributing to a more effective and equitable national response to DA.

There were two stages to the HOR. The first was a review of a sample of DVILR applications. The second involved gathering oral and written evidence from expert sector organisations. It is worth noting that a draft ToR was provided to the DACR. To our knowledge however, this was not published as is the norm with similar Home Office reviews⁶.

In June 2020, the HOR was published. Based on submitted evidence from stakeholders and analysis of the sample DVILR applications, the HOR concluded that:

1. There was insufficient evidence around which groups of migrant victims currently excluded from DDVC and DVILR are in most need of support, and whether provisions that are already in place might be able to meet these needs
2. There was insufficient evidence around the duration of support needed by migrant victims who are currently ineligible for the DDVC, and how they might be supported to move on from safe accommodation
3. As a result of these identified gaps in the evidence, the HOR concluded that there was insufficient information on the additional funding needed and how/where this should be directed. The Home Office would therefore undertake a pilot scheme (Supporting Migrant Victims) to provide emergency support to migrant victims with NRPF, which would also enable evidence gathering around these questions
4. Although the HOR received oral and written evidence on the topic of information sharing between police and immigration enforcement, it was determined that any decisions on this subject would be postponed until the conclusion of the super-complaint brought against the police by Liberty and Southall Black Sisters (SBS) (published in December 2020).

Following the publication of the HOR, stakeholders who had submitted evidence were highly critical of the HOR and published a number of responses detailing the chronology of their engagement with the evidence-gathering process and highlighting aspects of the

⁶ For example, the Terms of Reference for the Independent Review of the Prevent strategy, publicly available here: <https://www.gov.uk/government/publications/independent-review-of-prevent-terms-of-reference>

evidence submitted by the sector which they felt was omitted, misinterpreted or misrepresented in the final HOR⁷.

These post-review responses have provided useful context for the DACR from sector organisations' perspective about the review findings but also helped the DACR researchers to identify more information on the evidence submitted by VAWG sector organisations. For example, SBS and Latin American Women's Right Service (LAWRS) Joint Response (2020) highlights which sections of previously submitted evidence includes data on the immigration status of victims supported, the duration of support required and the barriers that migrant victims faced to accessing channels of support that were in principle open to them (for further analysis see sections 3.3 and 3.4).

1.2 Findings and recommendations

As part of their analysis of the evidence, researchers evaluated the extent to which HOR claims about the content and strength of the evidence on migrant victims was supported by submissions from stakeholders. DACR researchers identified three claims by the HOR which were not supported/substantiated by the evidence provided.

1. "What was unclear from the evidence we received was the immigration status of those who needed support, and particularly whether any other support was available to them. For example, we were provided with evidence that suggested that some individuals on visitor and student visas had come forward for support. However, individuals on these visas must prove that they are able to support themselves financially in order to be granted leave to enter the UK so it was not clear why they might have been in need" (Home Office, 2020: 11) – **reviewers identified supporting evidence provided as part of the evidence submissions that explains and justifies this need for support**
2. "Additionally, we saw evidence that victims of trafficking, asylum seekers, and those granted discretionary leave had also been provided with support. There is, however, existing support available for victims of trafficking through the National Referral Mechanism (NRM), asylum seekers who would otherwise be destitute are supported by the Home Office, and those with Discretionary Leave are granted recourse to public funds" (Home Office, 2020: 12) – **reviewers identified supporting evidence provided as part of the evidence submissions that explains and justifies this need for support**
3. "We were also told that the current system worked well for those currently eligible for the DDVC, but that, if the DDVC were expanded to cover other migrant groups who cannot apply for the DVILR, three months' support would not be long enough for many of them to resolve their situation and move on from the refuge. However, data from the 2019 Southall Black Sisters' report 'Safe and Secure' shows that of the 55 women they supported for which they had data, only seven were supported for longer than three months" (Home Office, 2020: 12-13) – **reviewers identified evidence in submissions by SBS, the Angelou Centre and S4S which explains and justifies**

⁷ Researchers reviewed responses to the HOR by: SBS & LAWRS (2020). *Migrant Victims of Domestic Abuse Review Findings: A response by Southall Black Sisters and Latin American Women's Rights Service* Rights of Women (2020). *Response to the Migrant Victims of Domestic Abuse Review Findings of July 2020: Domestic Abuse Bill 2020*

some migrant victims' need for longer-term support, including some victims who have spousal visas but whose cases are more complex.

There were other evidence sources referenced within the HOR which DACR researchers did not have access to within the review's timeframe. Researchers were therefore unable to 'triangulate' (cross-reference and support/substantiate) claims made in the HOR relating to these evidence sources:

- 1. Discussions between the Home Office and refuge managers from the charity Refuge in October 2019**
- 2. Internal records of DVILR applications (these were provided to the DAC).**

The conclusions in this report are organised under three themes that emerged during the process of critically appraising the evidence submitted to the HOR by stakeholders, evaluating the claims made in the HOR in light of this evidence (including claims around gaps and insufficiencies in the evidence), and identifying 'missing' evidence which was not referenced in the HOR despite being submitted by expert sector organisations.⁸ These are:

Theme 1: Lack of clarity on the rationale for the selective focus on certain types of evidence over others

- There are many types and sources of knowledge, and the role and function that each should play ought to have been expressly communicated to contributors. It is notable that contextual evidence/expertise by experience, such as case studies, were largely absent from the HOR. **It is not clear why this form of evidence was de-emphasised**
- As there was no published/final ToR to refer to, and as the HOR does not provide a detailed methodology regarding the evidence review process, researchers cannot conclusively state that this form of evidence was absent from the HOR because it was viewed as less credible than the grey literature reports which were cited. However, as this form of evidence was omitted from the HOR – and the HOR conclusion that there was insufficient evidence regarding questions which stakeholders felt had been thoroughly addressed in uncited evidence submissions – this seems to be a likely explanation
- A key finding from the DACR was that the omission of contextual evidence in the form of survivor case studies may have contributed to the HOR's conclusion that there was insufficient evidence on certain questions (e.g. to explain why migrant victims who entered the country with student or visitor visas would subsequently require support, as they should in theory be economically self-supporting). While contextual evidence is qualitatively different from the forms of data given greater prominence in the HOR (aggregated/national datasets) and cannot speak to quantitative issues such as the numbers of migrant victims in need of support and projected costs, it can afford insights about the complexities of migrant victims' journeys that cannot be discerned in quantitative, large-scale data. The DACR concluded that these nuances are central to understanding why stakeholders are

⁸ The DAC have also been given access to the 100 case files considered as part of the Stage 1 of the Home Office Review, and the DAC will be analysing these separately to contribute to the report's overall conclusions

calling for changes to the DDVC, and why the evidence suggests these changes are warranted

- Equally, DACR researchers would recommend undertaking a rapid evidence assessment (REA) of grey literature, academic research and other forms of published evidence prior to/in addition to soliciting evidence from the sector. This would enable reviewers to avoid duplication in the evidence-gathering process (e.g. calling for more information on questions where there is already a robust evidence base; soliciting new submissions from organisations who have already provided published written evidence in the recent past, as with the 2019 Joint Committee submissions) and placing additional pressure on the VAWG sector to collect and present evidence when existing grey literature/academic research may be a better 'fit' for the forms of evidence reviewers are seeking and regard as credible.

Theme 2: Trustworthy and relevant sources of evidence from expert sector organisations selectively omitted

- A review's effectiveness depends on the transparency, openness and the quality of dialogue with contributors. Feedback on the HOR before publication would have allowed for adjustments to correct any omission of evidence, enabling stakeholders to better understand and respond to HOR expectations for submissions and interpret the evidence provided

For instance, we found 13 instances where evidence provided or referenced by the sector was not referenced in the HOR. Following further examination of the sources for each of these statements, researchers identified four pieces of evidence that were not referenced in the HOR but exemplified the trustworthiness, value, relevance, and context criteria (Bates et al, 2018; McIlwaine & Evans, 2018; McIlwaine et al, 2019; Nye et al, 2018). This means that researchers judged that they would have been highly relevant to the questions and contexts that the HOR was designed to address, provided valuable information, and the evidence was gathered through appropriate and reliable methods.

Theme 3: Gaps in communication, particularly in relation to the lack of a published ToR

Evidence reviews (when not undertaken independently) are inevitably affected by the values and preferences of reviewers. This lack of independence is a significant weakness of the HOR. In order to militate against perceptions of bias or selective use of evidence, the HOR could have provided more information regarding the review process, and more detailed explanations for the justification/reasoning behind citing some sources and omitting others.

- It is unclear what the Home Office rationale was for selecting some evidence over others for inclusion in the HOR. Given the significance of the issue, it is important that a ToR be published at the beginning to provide guidance to contributors on the type of evidence that will be given more weight over others
- While the HOR included legitimate insights from stakeholders, it is essential (given the complex issues associated with support for migrant victims of domestic abuse) that stakeholders are given sufficient time to address any ambiguities identified by the Home Office from the evidence submitted before the HOR was published

- Where the HOR interpretation/characterisation of a piece of evidence significantly differs from that of the stakeholder who submitted the evidence, this should be noted and explained. Greater transparency and ongoing dialogue with the sector around ambiguities in the evidence provided could militate against charges of bias or misreading evidence where interpretations diverge.

Recommendations:

1. If future reviews on the topic of support for migrant victims are carried out, these should be expanded to reflect other equally robust submissions made by the sector and/or to clearly explain and justify the reliance on some forms of evidence and the omission of others. In order to support the rigour of any future reviews on this subject, and to avoid duplicating work/evidence-gathering, DACR researchers recommend undertaking a rapid evidence assessment (REA). While academic evidence reviews on migrant victims of domestic abuse in the UK is relatively sparse, the HOR would have been strengthened by an REA of the academic and grey literature to fully grasp the existing evidence base before/in addition to calling for new information (see Adisa, 2019)⁹
2. Ongoing dialogue with expert sector organisations be part of any future review or pilot project as it concerns support for migrant victims. It is unclear whether consultation with the sector ended after the workshops and final call for evidence in March 2020¹⁰ or if feedback was sought about the HOR before publication
3. Robust evidence be provided by the Home Office to support the claim on the financial costs of expanding the DDVC
4. An independent rapid evidence assessment or quick scoping review be undertaken. This will address the selective bias and transparency issues of the HOR
5. Future reviews include a ToR, technical appendix on methodology, and justification for selecting certain types of evidence, with weight assigned to the type of evidence; provided for transparency
6. A ToR should be published for future calls for evidence for the VAWG sector. Future ToRs should clearly set out the weighting of different types of evidence. This would help to prevent a mismatch in expectations between the reviewing agency and stakeholders contributing evidence
7. The findings in this report are drawn upon to ensure that the Supporting Migrant Victims (SMV) pilot is focused on meeting new information gaps identified by the DAC through its strand of work on migrant victims of domestic abuse. Given the extent of the written evidence provided by stakeholders for the HOR, and, prior to

⁹ Adisa O. (2019). [The effectiveness of interventions supporting migrant victims/survivors of domestic abuse: An evidence brief. University of Suffolk](#)

¹⁰ The Southall Black Sisters & LAWRS joint response to the HOR (2020) states that they and other members of the SUMW coalition received a final call for evidence on 18 March 2020. This was received in the form of an email from the “Home Office’s Domestic Violence Immigration Policy team, with a deadline to respond by 8 April” (SBS & LAWRS, 2020: 4)

this, for the Joint Committee, as well as the availability of a wider evidence base formed of grey literature and academic research, future work should build on this evidence base rather than duplicating it.

1.3 The structure of the report

This report has three main chapters. Chapter 2 introduces the methodology and scope of the DACR. Chapter 3 discusses the findings and the strengths and weaknesses of the HOR. The report concludes with a summary of the findings and recommendations.

2 Methodology & scope of the DACR

This section discusses the approach used in reviewing and triangulating the evidence provided for the DACR.

The DACR was carried out between March and April 2021 by Dr Olumide Adisa and Dr Katherine Allen at the University of Suffolk's Centre for Abuse Research.

The HOR's reception by stakeholders forms part of the wider context for the DACR, therefore shaping the approach taken by researchers. Post-HOR responses from Rights of Women (2020) and SBS and LAWRS indicate that several VAWG sector organisations who had contributed evidence were critical of the HOR's approach and conclusions. In their joint response to the HOR, SBS and LAWRS identified specific claims in the HOR which they perceived as unjustified or contradicted by the evidence with which the Home Office had been provided. For example, they rejected the HOR statement that "what was unclear from the evidence we received was the immigration status of those who needed support" (Home Office, 2020: 11), arguing that stakeholders had provided adequate evidence on this front.

Researchers systematically appraised the evidence submitted by stakeholders in order to understand the reasoning behind the HOR use of evidence, and to evaluate the accuracy of HOR claims about gaps in the evidence (and sector counter-claims that sufficient, trustworthy evidence had been provided). Critical appraisal and 'triangulation' (or cross-referencing and checking) of the evidence submitted and cited by stakeholders was adopted as this would allow researchers to assess whether the HOR selective use of evidence is justified or can be explained by differences in quality – that is, did the HOR cite only a small subset of the evidence sources which were provided to them (Thiara, 2019; Women's Aid, 2017; Women's Aid, 2018a; Women's Aid, 2018b; Women's Aid, 2019) because they judged other, uncited sources to be less trustworthy?

Following critical appraisal and cross-referencing of the evidence submitted by stakeholders, researchers did not identify a difference in methodological quality or credibility between the reports that were cited in the HOR and other reports/briefings that were not cited or referenced (e.g. Bates *et al*, 2018; McIlwaine & Evans, 2018; McIlwaine *et al*, 2018). However, researchers did discern patterns in the *kinds* of evidence included in the HOR, which may point to the need for clearer guidance by the Home Office around the types of evidence which would be accorded more weight in the HOR.

The DACR comprised three stages:

Stage 1: During the preliminary phase of the DACR, researchers reviewed the evidence submitted to the HOR by the VAWG sector, using qualitative data analysis software and 15 codes informed by the Centre for Evidence Based Management (CEBM) checklist (for further detail about this stage of the review, please see Appendix Section 5.1 and 5.2). This preliminary review stage enabled researchers to familiarise themselves with the evidence, and to assess the appropriateness of the CEBM checklist as an analytical framework for appraising each of the documents submitted by the sector. During this initial stage, researchers also flagged claims which were justified by appealing to external data sources rather than primary research for later ‘triangulation’. For example, if an evidence submission from LAWRS supported a claim or argument by citing a grey literature report from Women’s Aid, this was highlighted for cross-referencing in Stage 2.

Stage 2: Researchers went on to triangulate the claims flagged in Stage 1. Stage 2 would be crucial for evaluating evidence submissions which appealed to pre-existing literature, as well as developing an understanding of stakeholders’ and the HOR respective use of evidence (see Section 2.2. for more detailed explanation of this stage).

Stage 3: Researchers returned to the evidence that had been reviewed and coded during Stage 1. Initial analysis had shown that some of the evidence submitted to the HOR was not amenable to/appropriate for critical appraisal using the full CEBM checklist. For example, submissions from Women’s Aid (2020) and Step Up Migrant Women (2020) predominantly cited pre-existing reports and research, rather than presenting their own research or case studies (see Stage 2 for further details).

Equally, it was judged that submissions which grounded their claims in primary evidence from internal data and casework would be unlikely to meet criteria around methodological transparency – not because the evidence had been gathered using unreliable or deceptive methods, but because this data was collected in the course of VAWG provision and advocacy, rather than as part of a study aiming to present findings for peer review and publication. As such, it is probable that authors collated the data with a different set of evidential and presentational norms in mind (e.g., focused on monitoring and evaluation and understanding and documenting the needs of service users), rather than providing a replicable audit trail.

In order to appraise the submissions for which aspects of the CEBM checklist were unsuitable, researchers adapted the criteria for trustworthiness in qualitative research.

Qualitative research is appraised as trustworthy in relation to several key criteria, including¹¹:

- Credibility – the findings are credible, clearly justified by the evidence presented and based on a plausible interpretation of the data
- Transferability – the findings are richly described and of wider relevance; they can be extrapolated or applied to other contexts and groups of people
- Dependability/confirmability – the process for collecting and interpreting the evidence is consistent, appropriate and clearly explained
- Reflexivity – the researcher critically reflects on, and takes into account, their own biases, perspective and values.

¹¹ Korstjens, I. & Moser, A. (2018). ‘Series: Practical guidance to qualitative research. Part 4: Trustworthiness and publishing’, *European Journal of General Practice*, 24:1, 120-124, DOI: 10.1080/13814788.2017.1375092. As with the CEBM checklist, these criteria also include confirmability/dependability. However, for the reasons discussed, researchers determined that it would be inappropriate to apply this criterion to evidence submissions based on casework

Researchers adapted and simplified these criteria, appraising documents in relation to trustworthiness, value, relevance and context:

- Trustworthiness – appropriate research design and methods were used, the findings are credible and consistent with wider literature, clearly justified by the evidence presented, based on a plausible interpretation of the data
- Value – the evidence presented or described contributes to the conversation; it fills in or addresses gaps in the evidence; it amplifies marginalised or neglected voices and viewpoints. Additionally evidenced/measured for the purposes of the DACR by looking at frequency of citation across expert sector evidence submissions
- Relevance – the evidence presented or described is relevant to the subject (in this instance, the needs of migrant victims and barriers to accessing safety, support and justice)
- Context – the evidence presented or described is clearly placed in context; the context in which the research was carried out is relevant to the context to which the findings are being applied or extrapolated

These four lenses or categories broadly correspond to the underlying values tracked by the CEBM checklist – i.e. is the evidence relevant to the problem and context, are the findings trustworthy, and do the findings tell us anything new/valuable? These terms essentially simplify or distil the more complex and fine-grained questions from the CEBM checklist. This enabled DACR researchers to appraise the forms of primary evidence provided by stakeholders which, as previously noted, would have been unlikely to meet CEBM standards of methodological transparency (casework and service user case studies) but which the DACR researchers judged to be credible, relevant and valuable.

2.1 Stage 1 of the DACR: qualitative analysis guided by the CEBM checklist

The DACR used critical appraisal methods to systematically assess the evidence provided to the HOR.

Critical appraisal involves the use of a standardised framework to guide and support judgements of research quality. There are a range of critical appraisal tools available, which are tailored for different research methodologies and disciplines. Researchers chose to use the Centre for Evidence Based Management's Critical Appraisal of a Case Study checklist.

This tool was selected as it was considered to be the most appropriate rubric for assessing the various forms of primary evidence submitted by stakeholders, such as organisational and service user data, case studies of service users, and interview and survey data from service providers and service users.

During the initial stage of the review, researchers used the appraisal questions from this tool as a guiding framework to code, analyse and extract relevant findings and citations from reviewed studies.

Table 1: CEBM Critical Appraisal of a Case Study checklist¹²

1.	Did the study address a clearly focused question/issue?
2.	Is the research method (study design) appropriate for answering the research question?
3.	Are both the setting and the subjects representative of the population to which the findings will be referred?
4.	Are the methods for collecting data clearly described?
5.	Are the methods for analysing the data likely to be valid and reliable? Are quality control measures used?
6.	Was the analysis repeated by more than one researcher to ensure reliability?
7.	Is the researcher's perspective clearly described and taken into account?
8.	Are the results credible, and if so, are they relevant for practice?
9.	Are the conclusions drawn justified by the results?
10.	Are findings transferable to other settings?

Using these appraisal questions as a starting point, researchers developed a set of codes which would enable them to evaluate the evidence submitted for the HOR and establish whether HOR claims regarding the evidence were supported. Researchers independently reviewed and coded the data using qualitative data analysis software, ATLAS.ti¹³.

It was during this stage that researchers determined that some of the evidence submitted to the HOR was not amenable to/appropriate for critical appraisal using the full CEBM checklist, due to primarily presenting secondary evidence or evidence from casework. This would shape the approach taken to appraising the evidence in Stages 2 and 3 of the DACR.

In contrast to systematic reviews and academic research articles, which are evaluated in terms of methodological transparency or 'auditability', grey literature reports and evidence briefings (aimed at professionals, policy makers and the wider public) typically adhere to a different set of evidential norms and may lack any extensive or detailed discussion of methodology. Equally, there are additional ethical, legal and practical complexities around publishing some forms of data, particularly those relating to vulnerable participants and sensitive subjects. It is therefore not always feasible, or desirable, to evaluate grey literature and evidence briefings by precisely the same metrics as academic articles. Accordingly, while researchers critically assessed every report and evidence submission that we received which presented primary data, not all appraisal criteria were relevant to each document.

In Stage 3 therefore, researchers appraised all submitted evidence that was not suitable for the CEBM checklist through the lens of *trustworthiness, value, relevance, and context* (see [Methodology](#) above for details). The inclusion of experiential evidence from

¹² Centre for Evidence Based Management (July 2014), Critical Appraisal Checklist for a Case Study. Retrieved 07/05/2021 from <https://www.cebma.org>

¹³ ATLAS.ti is commonly used by researchers in the social sciences to support the systematic coding, annotation and analysis of documents and transcripts

practitioners/service providers and contextual evidence from migrant victims was also taken into account as a methodological ‘plus’, supporting the credibility of findings.

Written evidence presenting secondary data:

The majority of written evidence provided to researchers consisted of collated secondary/pre-existing evidence in support of the submitting organisation’s central claims and recommendations, predominantly citing grey literature reports and case studies from specialist organisations. For example, Women’s Aid (2020) referenced McIlwaine *et al’s* (2019) research with London-based migrant victims, the Liberty and SBS super-complaint on policing and immigration status¹⁴, and the organisation’s own Annual Audit (2019) and No Woman Turned Away annual project reports (2017, 2018, 2019).

As discussed further in the ‘[Triangulating evidence](#)’ section of this report, the breadth and consistency of supporting evidence referenced across these submissions supports the major ‘consensus’ claims advanced by the sector. Due to the scale of evidence drawn upon across all submissions, it was outside the scope of this review to critically appraise each piece of supporting evidence cited in these submissions.

Therefore, this review adopted a purposeful/pragmatic approach and focused on a particular subset of evidence that is important for appraising the HOR. Included in this subset were the relevant independent research findings and grey literature that were cited in evidence submissions but not referenced in the HOR, particularly those that appeared to contradict statements made in the Review or corresponded to gaps in evidence identified in the Review.

It is worth mentioning that to gain a better understanding of the wider body of evidence referenced by expert sector organisations (but not directly mentioned in HOR) we additionally reviewed the 93¹⁵ published written evidence submissions and supporting documents presented to the Joint Committee on the Draft Domestic Abuse Bill in April 2019.

Of these 93 published submissions and supporting documents:

- 15 presented primary research on migrant victims, or included substantive discussion of/engagement with existing research
- 17 discussed research on migrant victims, providing relevant citations
- 13 briefly referred to migrant victims but lacked any in-depth discussion
- 48 contained no references to migrant victims, or exclusively discussed ‘migrants’ and discrimination on the grounds of national origin in relation to abortion rights in Northern Ireland.

While outside the scope of this review, these 93 submissions provided relevant background for contextualising, and assessing the credibility of, the Migrant Review evidence submissions, and in analysing the use of evidence by specialist organisations and the Home Office. The

¹⁴ The final report based on this super-complaint is now completed and publicly available: HMICFRS, the College of Policing and the Independent Office for Police Conduct (2020) *Safe to share? Report on Liberty and Southall Black Sisters’ super-complaint on policing and immigration status* available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945314/safe-to-share-liberty-southall-black-sisters-super-complaint-policing-immigration-status.pdf

¹⁵ List of published written evidence available here: https://publications.parliament.uk/pa/jt201719/jtselect/jtddab/2075/207515.htm#_idTextAnchor073

extent to which these earlier submissions informed the direction and findings of the Review is unclear based on the content of the final report. However, it is worth noting that several organisations who provided relevant 2019 submissions were not listed among the 24 contributors to the Migrant Review (e.g. the AIRE Centre; the Children's Society; the Prison Reform Trust; the Refugee Council).

2.2 Stage 2 of the DACR: Triangulating the evidence

Triangulation is a research strategy which involves considering and comparing the evidence from multiple data sources, methodological approaches, theoretical perspectives and/or researchers.

Cross-referencing and comparing evidence in this way helps researchers gain a better understanding of a subject 'in the round' and assess the validity of findings. For example, demonstrating that multiple researchers have arrived at the same conclusions on a subject lends support to the validity of the conclusion, while identifying areas of disagreement may point to a need for further research. Additionally, it may indicate that underlying differences in values or theoretical frameworks are contributing to alternative interpretations of a broadly consistent body of evidence.

In the case of the DACR, researchers used triangulation to achieve several aims:

1. Understand how stakeholders and the Home Office used the evidence – which pieces of evidence were most commonly cited? Were there relevant and methodologically robust pieces of evidence provided by stakeholders not cited in the Home Office Migrant Review? Were there detectable differences in the patterns of evidence used by stakeholders and the Home Office?
2. Identify areas of agreement/disagreement in the collated evidence on migrant victims – does the evidence presented by stakeholders generally 'agree' when it comes to the major obstacles facing migrant victims in accessing safety, justice and support? If so, is there a similar agreement when it comes to recommendations for addressing these?
3. Ascertain whether there are remaining gaps in the evidence on the needs of migrant victims and consider how these might be addressed.
4. Identify where there are differing interpretations of, or glosses on, the same underlying evidence – if these exist, which interpretations are more closely linked to the facts and/or values?

Researchers were provided with a range of evidence from a variety of sources and time periods:

- Oral evidence to the Joint Committee on the Draft Domestic Abuse Bill – 21-22 May 2019)
- *Joint Committee on the Draft Domestic Abuse Bill: First Report of Session 2017–19* – June 2019. As background research, researchers additionally reviewed the written submissions provided for the Joint Committee, of which 15 were categorised as highly relevant for inclusion in the HOR

- Eight documents were submitted as written evidence for the HOR by stakeholders from the ending VAWG sector, provided between March - April 2020
- Three written summaries produced by the Home Office of the three workshops held in October 2019 with stakeholders (see Annex 1 for a full list of stakeholder attendees by workshop)
- Two written responses to the HOR findings by stakeholders (SBS and LAWRS – September 2020; Rights of Women – November 2020).

The Office of the DAC has also been given access to the 100 case files considered as part of the HOR and will be analysing these separately. This analysis will help inform the report's overall conclusions.

In total, we were provided with 16 documents relating to the HOR. As two of these documents postdate the HOR, written in response to the review findings rather than being submitted prior to its publication, these were not critically appraised or considered as part of the evidence on which the Home Office could reasonably have drawn. However, reviewing these documents added to researchers' understanding of the sector's expectations for the review and its use of evidence, as well as highlighting areas where stakeholders felt that the HOR understanding or framing of submitted evidence was inaccurate or incomplete.

2.3 Stage 3 of the DACR: Data extraction and critical appraisal

As discussed in this section's introduction, in contrast to systematic reviews and academic research articles (which are evaluated in terms of methodological transparency or 'auditability') grey literature reports and evidence briefings aimed at professionals, policy makers and the wider public typically adhere to a different set of evidential norms and may lack any extensive or detailed discussion of methodology. Equally, there are additional ethical, legal and practical complexities around publishing some forms of data, particularly those relating to vulnerable participants and sensitive subjects. It is therefore not always feasible, or desirable, to evaluate grey literature and evidence briefings by precisely the same metrics as academic articles. Accordingly, while researchers critically assessed every report and evidence submission that we received which presented primary data for trustworthiness, value, relevance and context, not all of the CEBM appraisal criteria were relevant to each document.

In order to appraise submissions, including those for which aspects of the CEBM checklist were unsuitable, researchers adapted the criteria for evaluating trustworthiness in qualitative research.

Critically appraised on trustworthiness, value, relevance and context:

We reviewed two documents submitted as written evidence to the HOR by SBS – including one joint submission with their Recourse to Safety partner organisations¹⁶ the Angelou Centre

¹⁶ Recourse to Safety was a national, "two-year project funded by the DCMS Tampon Tax Fund (TTF) for the period 1 April 2019 to 31 March 2021" (Southall Black Sisters, the Angelou Centre & Safety4Sisters North West, 2020). The project provided safe accommodation, subsistence, advice,

and S4S – which presented primary data from their work with migrant women (e.g. case work/service user statistical and outcome data, case studies, experiential evidence and systems knowledge from practice). These evidence submissions were appraised for trustworthiness, value, relevance and context, although not all CEBM appraisal criteria were relevant given the nature of the evidence.

Researchers judged these findings to be trustworthy, as they were consistent with findings about the distinctive needs and experiences of migrant victims across the wider academic and grey literature, grounded in service user data, case studies and experiential evidence from practitioners, while the conclusions drawn were clearly situated in relation to/justified by the data presented. They were judged to represent a valuable contribution to the evidence as they shed light on the nuances and complexities of migrant victims' experiences of abuse, and how these intersect with immigration status. For example, 'F's' case study vividly illustrates the practical and emotional barriers some migrant victims face when trying to access existing channels of support to which they are theoretically entitled:

"F was eventually referred to SBS and we began assisting her in June 2018 when she and her children presented as homeless as her friend could no longer assist her. She was extremely fearful that her children would be taken away from her by the police due to her immigration status. We made an immediate referral to social services for accommodation funded under Section 17 of the Children's Act, but this was refused on the basis that they disputed her history of abuse." (SBS, 2020)

This form of evidence was judged to be highly relevant to the questions raised by the HOR regarding the forms of provision that are already available for migrant victims, and why further support would be warranted.

Critically appraised using CEBM checklist:

In total, researchers critically appraised nine reports against the full CEBM checklist criteria - five of which were cited in the HOR (Thiara, 2019; Women's Aid, 2017; Women's Aid, 2018a; Women's Aid, 2018b; Women's Aid, 2019) and four of which were referenced by the sector as part of their written evidence but not cited or referenced in the HOR (Bates *et al*, 2018; McIlwaine & Evans, 2018; McIlwaine *et al*, 2019; Safety4Sisters North West, 2016).

- *Women's Aid (2018) Funding a National Network of Refuges Providing a lifeline for families fleeing domestic abuse* – grey literature produced by ending VAWG umbrella organisation
- *Women's Aid (2017) Nowhere to Turn: Findings from the First Year of the No Woman Turned Away project* – grey literature produced by ending VAWG umbrella organisation
- *Women's Aid (2018) Nowhere to Turn, 2018: Findings from the second year of the No Woman Turned Away project* – grey literature produced by ending VAWG umbrella organisation

advocacy and holistic wrap-around support for abused migrant women, primarily those with non-spousal visas

- Women’s Aid (2019) *Nowhere to Turn: Findings from the third year of the No Woman Turned Away project* – grey literature produced by VAWG umbrella organisation
- Mcllwaine, C., Granada, L. & Valenzuela-Oblitas, I. (2019) *The Right to be Believed: Migrant women facing Violence Against Women and Girls (VAWG) in the ‘hostile immigration environment’ in London* – research report from academics, co-produced with VAWG organisation
- Thiara, R. (2019) *Safe and Secure: The No Recourse Fund. Report of Findings* – pilot evaluation by academic researcher
- Mcllwaine, C., Evans, Y. (2018) *We can’t Fight in the Dark: Violence Against Women and Girls (VAWG) among Brazilians in London*. King’s College London – research report from academics, co-produced with VAWG organisation
- Safety4Sisters North West (2016) *Migrant Women’s Rights to Safety Pilot Project* – grey literature pilot evaluation produced by specialist ‘by and for’ organisation
- Bates, L., Gangoli, G., Hester, M. and Justice Project Team (2018), *Policy Evidence Summary 1: Migrant Women*. University of Bristol, Bristol – evidence summary based on academic research

Researchers detected no disparity in terms of trustworthiness or other appraisal criteria between reports that were cited in the HOR versus those that were not selected for inclusion. Further details of researchers’ critical appraisal of these reports can be found in the Appendix sections 5.6-5.10 and 5.13-5.16.

Written evidence presenting secondary data:

The majority of written evidence provided to researchers consisted of collated secondary/pre-existing evidence in support of the submitting organisation’s central claims and recommendations, predominantly citing grey literature reports and case studies from specialist organisations. For example, Women’s Aid (2020) referenced Mcllwaine *et al’s* (2019) research with London-based migrant victims, the Liberty and SBS super-complaint on policing and immigration status¹⁷, and the organisation’s own Annual Audit (2019) and No Woman Turned Away annual project reports (2017, 2018, 2019).

As discussed further in the ‘[Triangulating evidence](#)’ section of this report, the breadth and consistency of supporting evidence referenced across these submissions supports the major ‘consensus’ claims advanced by the sector. Due to the scale of evidence drawn upon across all submissions, it was outside the scope of this review to critically appraise each piece of supporting evidence cited in these submissions.

Therefore, this review adopted a purposeful/pragmatic approach and focused on a particular subset of evidence that is important for appraising the HOR. This subset were the relevant independent research findings and grey literature that were cited in evidence submissions but

¹⁷ Her Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) (2020) *Safe to share? Report on Liberty and Southall Black Sisters’ super-complaint on policing and immigration status*. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945314/safe-to-share-liberty-southall-black-sisters-super-complaint-policing-immigration-status.pdf (Accessed: 01 April 2021)

not referenced in the HOR, particularly those that appeared to contradict statements made in the Review or corresponded to gaps in evidence identified in the Review.

It is worth mentioning that to gain a better understanding of the wider body of evidence referenced by expert sector organisations (but not directly mentioned in HOR), we additionally reviewed the 93 published written evidence submissions and supporting documents presented to the Joint Committee on the Draft Domestic Abuse Bill in April 2019 (see Appendix section 5.4 for further details).

Of these 93 published submissions and supporting documents:

- 15 presented primary research on migrant victims, or included substantive discussion of/engagement with existing research
- 17 discussed research on migrant victims, providing relevant citations
- 13 briefly referred to migrant victims but lacked any in-depth discussion
- 48 contained no references to migrant victims, or exclusively discussed ‘migrants’ and discrimination on the grounds of national origin in relation to abortion rights in Northern Ireland.

While outside the scope of this review, these 93 submissions provided relevant background for contextualising and assessing the credibility of the HOR evidence submissions, and in analysing the use of evidence by specialist organisations and the Home Office. The extent to which these earlier submissions informed the direction and findings of the Review is unclear based on the content of the final report. However, it is worth noting that several organisations who provided relevant 2019 submissions were not listed among the 24 contributors to the HOR (e.g. the AIRE Centre; the Children’s Society; the Prison Reform Trust; the Refugee Council).

3 Findings

3.1 Approach and scope of the Home Office Review

This section will briefly summarise the methodological approach taken by the HOR, including an overview of the ToR, and appraise the strengths and weaknesses of the process.

Researchers were provided with an initial draft of the Home Office ToR, which was produced in August 2019. The stated aim outlined in the initial ToR was to consider the evidence for “extending the domestic violence provisions of the Immigration Rules to all migrant victims of domestic abuse, in light of the recommendations made by the Joint Select Committee on the Draft Domestic Abuse Bill”.

In particular, the HOR was designed to shed further light on the issues migrant victims currently face in relation to insecure immigration status, access to safe accommodation, subsistence, support and legal services; to identify areas for improvement in existing provision, and to examine how the existing provision could be extended and augmented to identified gaps in support. These aims closely correspond to the content of the final HOR report.

The ToR outlined four objectives through which the review would achieve this overarching aim (Home Office, 2019):

- a. Gather and interrogate the evidence on the issue
- b. Understand whether additional support is required to assist this group of victims
- c. Develop proposals to address gaps in support
- d. Understand the risks, costs and impacts of any proposals.

The original timeframe for producing initial findings and recommendations was Autumn 2019. This version of the ToR is relatively sparse, at around 390 words, and contains limited detail.¹⁸ In order to understand how the ToR may have shaped Home Office Review outcomes and to assess whether the ToR for the HOR conforms to the norms/standards for this type of document, researchers reviewed the ToR as well as two relevant comparators: ToR for the *Independent Review of Prevent* and the multiple ToR for the *COVID-19 Response – Spring 2021: roadmap reviews*.¹⁹

Researchers found that the draft ToR for the HOR was less detailed/lengthy than those published for the independent review of Prevent (around 590 words) and the multiple ToR for different components of the *Roadmap Reviews* (combined word count of around 2290 words across four ToR).

Given the legislative, practical and ethical complexities associated with the HOR, it is arguable that taking a similar approach to the *Roadmap Reviews* (multiple ToR allowing for a more granular set of objectives relating to each sub-topic) would have been commensurate to the task at hand. Equally, given the tabling/postponement of reviewing the need for a firewall between police and immigration enforcement in light of the (then) ongoing super-complaint, this section of the wider Migrant Review could have been outlined separately, with more detailed specifications around the DDVC and DVILR components of the review.

As understanding the projected costs associated with proposed changes to provision for migrant victims was one of the four main objectives of the review – and as the final HOR concluded that they had received/reviewed insufficient evidence in relation to this – detailed guidance on the evidence needed to fulfil this objective may have supported the effectiveness of the review.

Researchers reviewed the HOR ToR in reference to the following questions:

1. Were the objectives specific, achievable, relevant, measurable and timely?
2. Was there clear guidance regarding the amount and forms of data/input from stakeholders needed to satisfy these objectives?
3. Was consideration given to identifying relevant resources and evidence that are already available, to ensure that the review is not duplicating work or omitting relevant materials?

Researchers judged that the objectives were relevant, guided by the Joint Committee's findings and recommendations. However, the brevity of the draft ToR and the lack of specificity/precise language means that it is difficult to assess how measurable and achievable the objectives are

¹⁸ Although as an initial draft it is possible that subsequent versions were more detailed

¹⁹ <https://www.gov.uk/government/publications/covid-19-response-spring-2021-reviews-terms-of-reference>

within the timeframe – ‘gathering and interrogating the evidence’ could involve returning to the Joint Committee’s evidence with a critical eye, soliciting new, ‘bespoke’ evidence from stakeholders and/or undertaking an extensive literature review.

Similarly, although the Home Office’s stated aim is to “improve our understanding of the issues raised by the committee and the evidence behind these”, it is unclear from the initial draft what the scope or parameters of this process are, and whether this will involve reviewing the evidence submitted to the Joint Committee (Home Office, 2019). As the final HOR does not cite or refer to evidence submitted to the Joint Committee, more clarity around this in the ToR would have been helpful. It is possible that evidence already submitted by stakeholders to the Joint Committee was not resubmitted for the HOR, and this could have contributed to the Home Office’s perception of gaps in the evidence.

The final HOR, which was published in June 2020, was undertaken in two stages. The first stage utilised 100 sample cases from the Home Office’s internal management information systems; and the second stage involved “gathering evidence from 24 expert organisations representing or specialising in the complex and interrelated issues” (S.5, p.6) experienced by migrant victims of domestic abuse. This gathering of evidence involved written submissions and three workshops with stakeholders, as well as discussions with key refuge managers from the charity Refuge.

3.2 Use of evidence by the HOR

Researchers reviewed the HOR and the evidence provided by stakeholders in order to understand the HOR use of evidence, with particular attention to the written evidence and reports which researchers had critically appraised and found to be trustworthy, valuable, relevant and clearly contextualised.

The HOR cited five documents from ending VAWG organisations; four from a ‘mainstream’ service provider (Women’s Aid) and one from a specialist ‘by and for’ organisation which works extensively with migrant women – SBS (See Table 2 below).

Table 2: Evidence from the ending VAWG sector that was cited in the HOR

Women’s Aid (2018) <i>Funding a National Network of Refuges</i>
Women’s Aid (2017) <i>Nowhere to Turn: Findings from the first year of the No Woman Turned Away project</i>
Women’s Aid (2018) <i>Nowhere to Turn, 2018: Findings from the second year of the No Woman Turned Away project</i>
Women’s Aid (2019) <i>Nowhere to Turn, 2019: Findings from the third year of the No Woman Turned Away project</i>
Thiara, R. (2019) <i>Safe and Secure: The No Recourse Fund</i>

While reviewing the evidence, researchers identified 13 instances where relevant evidence provided or referenced by the sector was not referenced in the HOR (see Table 14 in Appendix section 5.13 for further details).

Each of these claims or pieces of evidence were flagged by reviewers for future triangulation and coded as relevant evidence that had not been cited or referenced in the HOR.

While all of these statements were relevant and represented potentially valuable contributions to the evidence, not all met the trustworthiness and context criteria. For example, it was difficult to establish the evidential provenance of statements made in the Home Office workshops which were based on notes taken by the Home Office during oral evidence from a number of stakeholders. This made assessing trustworthiness, and understanding the context within which these claims arose/their wider applicability, challenging. Equally, some statements from the sector were based on organisational data that was not featured in the evidence submissions provided to the DACR.

Following further examination of the sources for each of these statements, researchers identified four pieces of evidence that were not referenced in the HOR but exemplified the trustworthiness, value, relevance, and context criteria. These are:

- The evidence briefing (Bates *et al*, 2018) and grey literature reports (McIlwaine & Evans, 2018; McIlwaine *et al*, 2019). These were additionally critically appraised using the CEBM checklist (see Tables in Technical Appendix). Both McIlwaine & Evans (2018) and Mcilwaine *et al's* (2019) reports incorporate findings gathered through survey responses; surveys are widely used in VAWG research on prevalence and forms of victimisation, with a well-established body of evidence on designing survey instruments that yield accurate/reliable estimates (e.g. behaviourally-specific wording)
- The Freedom of Information request submitted by the BBC's Victoria Derbyshire programme regarding information sharing by police with the Home Office for immigration enforcement purposes. The responses showed that around two-thirds of police forces reported sharing information with the Home Office. (Nye, Bloomer & Jeraj, 2018). While this news report was not suitable for critical appraisal using the CEBM checklist, it was assessed as highly relevant and trustworthy, based on nationwide police data. It was also gathered through an appropriate and reliable method: Freedom of Information requests are an emerging research tool in social research, enabling researchers to bypass "routinised" and formulaic releases of public information in order to "access the raw data and uncover the interconnections between phenomena" (Savage & Hyde, 2014: 305) ²⁰.

²⁰ Savage, A. & Hyde, R. (2014). 'Using freedom of information requests to facilitate research', *International Journal of Social Research Methodology*, 17:3, 303-317, DOI: 10.1080/13645579.2012.742280

Table 3: Relevant and trustworthy evidence not cited in HOR

Relevant evidence not included in HOR	Evidence submission referenced in	Original source of evidence
<ul style="list-style-type: none"> • “Responses to Freedom of Information requests in England and Wales from 45 police forces confirm that 27 of these share victims’ details with the Home Office for immigration control purposes and only three responded that they do not share victims’ information” 	<p>SUMW/LAWRS (2018) <i>Safe Reporting of Crime for Migrants with Insecure Immigration Status: Roundtable Report</i></p>	<p>Nye, C., Bloomer, N. & Jeraj, S. (2018). ‘Victims of serious crime face arrest over immigration status’, (BBC News)</p>
<ul style="list-style-type: none"> • “More than half of women surveyed by Kings College London and Latin American Women’s Rights Service, reported they felt they would not be believed by the police because of their immigration status (54%) with more than half feeling that the police or the Home Office would support the perpetrator over them (52%)” 	<p>Women’s Aid (2020) <i>Protection for Migrant Women</i>. Evidence submission</p>	<p>McIlwaine, C., Granada, L. & Valenzuela-Oblitas, I. (2019) <i>The Right to be Believed: Migrant women facing Violence Against Women and Girls (VAWG) in the ‘hostile immigration environment’ in London</i></p>
<ul style="list-style-type: none"> • “Reporting VAWG amongst Brazilians in London is limited and hampered by lack of information, shame, fear and insecure immigration status • “Reporting is affected by a range of different barriers, including women not always being aware of what VAWG refers to, especially in relation to emotional/psychological violence. As a result, many are often made aware of VAWG indirectly through accessing other services • “A majority (56%) of women never reported an episode of violence in London, mainly because they thought nothing would be done about it, lack of information, shame, and fear of deportation due to insecure immigration status • “Reporting to the police was mainly a negative experience, especially when women had irregular immigration status” 	<p>SUMW/LAWRS (2018) <i>Safe Reporting of Crime for Migrants with Insecure Immigration Status: Roundtable Report</i></p>	<p>McIlwaine, C. & Evans, Y. (2018), <i>We can’t Fight in the Dark: Violence Against Women and Girls (VAWG) among Brazilians in London</i>. King’s College London</p>

Relevant evidence not included in HOR	Evidence submission referenced in	Original source of evidence
<ul style="list-style-type: none"> • “The Justice Project team conducted interviews with 251 women victims of VAWG where 37 had insecure migrant status and the other 202 held UK/ EU status or ‘secure’ status • “Key findings include women with insecure migrant status being destitute at higher rates as a result of VAWG and experiencing multiple perpetrators in lifetime. Moreover, police conducted fewer investigations, fewer civil injunctions were provided, and fewer migrant women accessed to family court” 	SUMW/LAWRS (2018) <i>Safe Reporting of Crime for Migrants with Insecure Immigration Status: Roundtable Report</i>	Bates, L., Gangoli, G., Hester, M. and Justice Project Team (2018), <i>Policy Evidence Summary 1: Migrant Women</i> . University of Bristol, Bristol.)

We triangulated 15 claims made in the HOR regarding the evidence on migrant victims, by cross-referencing these claims against the various pieces of evidence submitted or drawn upon as far as possible. It is worth noting that a written summary of the October 2019 meeting with refuge managers from the charity Refuge (S.16) was not provided to the DAC, in spite of this meeting prominently featuring in the HOR. As a result, researchers were not able to review the content of this meeting in detail, and are unable to assess the validity of the evidence provided by refuge managers. In line with our critical appraisal methods, it was challenging to confirm the ‘trustworthiness’ of this data source.

Similarly, we did not have access to the internal management records the Home Office used to adjudicate between conflicting evidence regarding the adequacy of the three-month timeframe for support under the DDVC:

“We received conflicting feedback about whether the current three-month timeframe for support under the DDVC was long enough. Under the existing arrangement, where an application for the DVILR is made within three months, support will continue under the DDVC until that application has been decided rather than end at the three-month mark. The Home Office’s internal management information shows that the majority of DVILR applications are made within three months” (Home Office, 2020: S.27, p.12).

There were therefore some aspects of the HOR that lacked transparency/auditability.

Theme 1: Lack of clarity on the selective focus on certain types of evidence over others

SBS were mentioned five times in the review but we note that the Home Office review selectively focuses on the SBS pilot evaluation (Thiara, 2019) which only captures information on 55 women. DACR researchers have not drawn attention to this sample size, suggesting that this is an inadequate or unrepresentative group of service users, or that smaller sample sizes should preclude a study/report being used as evidence in the HOR or future reviews on migrant victims. However, other grey literature reports with equally robust methodology and based on similar or greater sample sizes were not cited in the HOR. In order to provide more

clarity around the HOR inclusion criteria and expectations for stakeholders submitting evidence, and to militate against charges of selectivity or lack of rigour, it would therefore have been beneficial for the reasoning for this decision to be explained. For example, while Thiara's (2019) report met the criteria of trustworthiness, value, relevance, and context, research reports from LAWRS/SUMW, McIlwaine *et al* (2019)²¹, McIlwaine & Evans (2018)²² and Safety4Sisters²³ (2016) also met these criteria and yet were not referenced in the HOR, despite being submitted to the Home Office. It is not clear why these pieces of evidence were not referenced.

Based on the five citations of evidence provided by the ending VAWG sector, the Home Office predominantly chose to reference published reports featuring data collected/aggregated by a national umbrella organisation (Women's Aid, 2017, 2018a, 2018b, 2019) in addition to one citation of Thiara's (2019) independent evaluation of the No Recourse Fund Pilot.

Theme 2: Trustworthy and relevant sources of evidence from expert sector organisations selectively omitted

While we critically appraised the Women's Aid reports and found them to be trustworthy – yielding credible findings which give a good sense of the scale and contours of the barriers facing migrant victims across England – as noted, other evidence submissions which were found to be similarly valuable and trustworthy were not cited or referred to in the review.

It is also notable that some forms of evidence which featured prominently in ending VAWG sector submissions, including the Women's Aid No Woman Turned Away reports (contextual evidence and expertise by experience²⁴) were largely absent from the HOR, even in instances where these reports were cited, suggesting that the wider evidence source was judged to be trustworthy and relevant for inclusion. It is not clear why this form of evidence was de-emphasised in the HOR.

This disparity may point to a need to tailor evidence submissions to make the salience of this kind of evidence at a national/policy level clearer. Our analysis suggests that the sector's use of case studies and testimony from migrant victims fulfils an important evidential role, illustrating the complexity of victim's needs and experiences, and justifying the recommendations to build more flexibility into the system. For example, the HOR presented some of the central 'consensus' claims advanced by the sector as unjustified/under-evidenced with respect to the need to extend the DDVC to victims with non-spousal visas, when the recommendation is supported by case studies detailing how and why some migrant victims are unable to access timely support under the present system.

²¹ Study based on survey research with 50 migrant women and semi-structured interviews with 11 migrant women with current or previous insecure immigration status

²² Study based on quantitative survey research with 175 migrant women, 25 in-depth interviews and five focus group discussions

²³ Internal evaluation/reflections based on 10-month pilot project – case histories for 61 women.

²⁴ In addition to including aggregated, nationally-representative data gathered via national databases such as Routes to Support and the National Domestic Violence Helpline, the No Woman Turned Away annual reports also highlight contextual evidence describing survivors' experiences of help-seeking (interviews with survivors; artworks from survivors; survey data from survivors) and experiential evidence from practitioners (interviews with caseworkers, case notes, and capture forms regarding bad practice)

As engagement with sector organisations in the HOR is so important, the ambiguities and uncertainties in the interpretation of the evidence base may have been addressed by expert sector organisations if given the opportunity to have done so. Instead, leaving out the evidence raises questions of ‘selectivity bias’ about the exclusion of certain types of evidence. To elaborate on three examples identified in the DACR:

Example 1: Claim no. 6, made in S. 23 of the HOR

The Home Office report states that:

“What was unclear from the evidence we received was the immigration status of those who needed support, and particularly whether any other support was available to them. For example, we were provided with evidence that suggested that some individuals on visitor and student visas had come forward for support. However, individuals on these visas must prove that they are able to support themselves financially in order to be granted leave to enter the UK so it was not clear why they might have been in need.” (S.23)

This statement seems to be based on selected sections of the evidence presented. One of the expert submissions which was not referenced in the HOR stated that “Economic abuse was a common thread and all of the 70 migrant women with insecure status had been economically abused and had no or very little money of their own. They were prevented from working and not given any or very little money for basic needs or were made to work and their wages taken off them.” (Source: Safe and Secure – Final Report – October 2019)

This evidence source clearly demonstrated that victims of domestic abuse, regardless of whether their visa status required demonstration of economic independence, were vulnerable to economic abuse. This evidence was not considered by the Home Office and would have addressed the clarity issue around who should be targeted for support as the evidence suggests that migrant victims of domestic abuse may be particularly vulnerable to economic abuse (McIlwaine *et al*, 2019; Thiara, 2019), potentially resulting in a radical change in their economic circumstances and ability to support themselves.

Example 2: One reference to a ‘child’ of EEA migrants, S.45, HOR

As this case study also illustrates, the children of migrant victims with non-spousal visas and NRPF are themselves vulnerable to ongoing abuse, family separation and/or destitution, yet the impact of proposed changes to the DA Bill on children is largely unexplored in the HOR. The evidence submission by SBS, the Angelou Centre & S4S suggests that inconsistencies in the interpretation of statutory guidance by local authorities results in a postcode lottery for migrant families at risk of destitution:

“Vulnerable migrant women with children who face destitution should receive local authority support under Section 17 of the Children Act 1989, which stipulates that local authorities must provide accommodation and financial support to families for safeguarding reasons. However, our experience and that of other organisations show that local authorities regularly fail to meet their responsibilities to vulnerable families, explained in part by a lack of resources in the context of austerity, and the absence of statutory guidance as to how to support those with NRPF. There is considerable inconsistency of practice across the UK in the support that is given to migrant women and children.” (SBS, the Angelou Centre & S4S: 2020)

Example 3: “bureaucratic” abuse and “perpetrators” acknowledged once in S.47, HOR

The evidence presented by the sector for the HOR regarding “bureaucratic” abuse (McIlwaine *et al*, 2019: 8), wherein perpetrators intimidate and consolidate control over migrant victims by withholding immigration documents, delaying or interfering with the progress of regularising/securing permanent status, and/or purposely misleading victims about their status and rights in the UK, further clarifies this point. Immigration status and economic self-sufficiency are not always fixed and straightforward categories, but can be complex and subject to change, sometimes as a direct result of coercive and controlling behaviours by the perpetrator(s). Case study evidence presented by the sector illustrates how this form of abuse can leave migrant victims who entered the country on student or visitor visas in precarious economic/legal situations:

“KB came to the UK in 2009 from Bolivia with a 6-month student visa. She met her partner and lived with him for two years with their two daughters. She became a victim of emotional and psychological abuse. KB did not report to social services and the police out of fear of her daughters being taken away and of being deported. Her ex-partner threatened her with this which caused her anxiety leading to suicide attempts by drinking bleach at one point. She was denied refuge because of her immigration status and has continued to live with perpetrator in the same house.” (LAWRS, 2018: 8)

Based on these examples, it is reasonable to conclude that the HOR did not go far enough in considering the full breadth of evidence provided by the sector. In section 4, the DACR provides some recommendations for addressing the gaps identified.

Theme 3: Gaps in communication, particularly in relation to the lack of a published ToR

Reviews commissioned or undertaken by government agencies tend to have a published ToR to support the call for evidence. Researchers received an initial ToR, which was drafted on 21 August 2019. Researchers reviewed the document to understand the original remit and objectives, and to assess the extent to which the range of evidence submitted corresponds to (or diverges from) the ‘steer’ from the Home Office. As an early draft document which did not contain any of the guidance for evidence submissions that may have been given in later versions, it was challenging to gauge how far the differing use of evidence by the ending VAWG sector and by the HOR is linked to the terms of reference.

Evidence reviews (when not undertaken independently) are inevitably affected by the values and preferences of reviewers. This lack of independence is a significant weakness of the HOR. In order to militate against perceptions of bias or selective use of evidence, the HOR could have provided more information regarding the review process, and more detailed explanations for the justification/reasoning behind citing some sources and omitting others. Equally, given the significance of the issue and the additional pressures evidence-gathering and presentation may place on stakeholders, it is important that a ToR be published at the beginning to provide guidance to contributors on the type of evidence that will be given more weight over others.

While the HOR included legitimate insights from stakeholders, it would have strengthened the review findings if stakeholders had been given sufficient time to address any ambiguities in the evidence identified by the Home Office before the HOR was published. Equally, had stakeholders been given an opportunity to review the HOR prior to its publication, this would have enabled them to flag any concerns about the interpretation or framing of evidence that were subsequently raised in post-review responses.

3.3 Strengths and areas of improvement identified for the HOR:

This section summarises some of the strengths and limitations of the HOR. Some of the points raised as limitations have already been highlighted under the review findings.

- Although some relevant and trustworthy sources of evidence were not referenced, the HOR mentioned that it used multiple sources of evidence for the review (grey literature, workshops, conversations with refuge managers, and DVILR cases)
- Clear ‘brief’ and purpose of the review mentioned in the HOR, both supported by referencing the Joint Committee on the Draft Domestic Abuse Bill. Recommendations to consider:
 1. Duration of DDVC and access to refuge
 2. The introduction of a data-sharing ‘firewall’ between police and immigration enforcement
 3. Ensuring migrant victims have appropriate access to the EU Settlement Scheme
- However, as referenced above, the draft ToR used internally lacked detail. As mentioned earlier, a well-laid out ToR published with the Home Office Call for Evidence would have been useful
- A huge part of the HOR focused on points 1 and 3 and the HOR was clear about its stance on point 2 to defer its decision until after the outcome of the Liberty/SBS super-complaint before concluding as to the information sharing and the establishment of the firewall issue raised by the Joint Committee and expert sector organisations. As this super-complaint was published in December 2020, the HOR was reserved about making claims on this issue.

3.4 The claims and conclusions of the HOR regarding evidence collected

Researchers reviewed the claims made in the HOR regarding the evidence submitted by stakeholders, cross-referencing or ‘triangulating’ with the original evidence wherever possible in order to assess the credibility of findings.

Researchers triangulated both ‘descriptive’ and ‘evaluative’ claims made by the Home Office regarding the evidence. For example, the HOR contains this descriptive claim paraphrasing a

statement made by stakeholders regarding the needs of some migrant victims on ‘self-supporting’ visas: “we were provided with evidence that suggested that some individuals on visitor and student visas had come forward for support” (Home Office, 2020: 11-12). However, this descriptive claim is embedded within, and forms part of the context for, a wider evaluative claim made by the Home Office, regarding the value and meaning of the evidence provided:

“What was unclear from the evidence we received was the immigration status of those who needed support, and particularly whether any other support was available to them. For example, we were provided with evidence that suggested that some individuals on visitor and student visas had come forward for support. However, individuals on these visas must prove that they are able to support themselves financially in order to be granted leave to enter the UK so it was not clear why they might have been in need” (Home Office, 2020: 11-12).

Capturing both kinds of claims was important for understanding the HOR use of evidence, and for considering how and why their interpretations of the same evidence might differ from those offered by stakeholders. All claims, descriptive and evaluative, are recorded in Table 8 in Section 5.7 of the technical appendix. The main evaluative/inferential claims made by HO regarding the value and significance of the evidence are listed below.

Credible claims:

1. Some migrant victims’ access to safe accommodation is restricted due to the intersection of immigration policy around recourse to public funds and refuge funding streams (50% through housing benefit). This makes it unsustainable for many refuges to accommodate victims with or believed to have NRPF, disincentivising them from providing equal access to all – referenced in workshop, evidenced in reports from Women’s Aid, including No Woman Turned Away project, which were cited in HOR

Claims that were not judged to be credible:

1. “What was unclear from the evidence we received was the immigration status of those who needed support, and particularly whether any other support was available to them. For example, we were provided with evidence that suggested that some individuals on visitor and student visas had come forward for support. However, individuals on these visas must prove that they are able to support themselves financially in order to be granted leave to enter the UK so it was not clear why they might have been in need” (Home Office, 2020: 11) – **reviewers identified supporting evidence provided as part of the evidence submissions explaining and justifying this need for support**
2. “Additionally, we saw evidence that victims of trafficking, asylum seekers, and those granted discretionary leave had also been provided with support. There is, however, existing support available for victims of trafficking through the National Referral Mechanism (NRM), asylum seekers who would otherwise be destitute are supported by the Home Office, and those with Discretionary Leave are granted recourse to public funds” (Home Office, 2020: 12) – **reviewers identified supporting evidence provided as part of the evidence submissions that explains and justifies this need for support**
3. “We were also told that the current system worked well for those currently eligible for the DDVC, but that, if the DDVC were expanded to cover other migrant groups who cannot apply for the DVILR, three months’ support would not be long enough for many of them to resolve their situation and move on from the refuge. However, data from the

2019 Southall Black Sisters' report 'Safe and Secure' shows that of the 55 women they supported for which they had data, only seven were supported for longer than three months" (Home Office, 2020: 12-13) – **reviewers identified evidence in submissions by Southall Black Sisters, the Angelou Centre and Safety4Sisters which explains and justifies some migrant victims' need for longer-term support, including some victims who have spousal visas but whose cases are more complex.**

Evidence that researchers were not able to access within the timeframe of the review in order to triangulate/cross-reference claims made in the HOR:

1. Discussions between the Home Office and refuge managers from the charity Refuge in October 2019
2. Internal records of DVILR applications (these were provided to the Office of the DAC).

Discussion:

A key finding from the DACR was that the omission of contextual evidence in the form of survivor case studies may have contributed to the HOR's conclusion that there was insufficient evidence on certain questions. While contextual evidence is qualitatively different from the forms of data given greater prominence in the HOR (aggregated/national datasets), and cannot speak to quantitative issues such as the numbers of migrant victims in need of support and associated costs, it can afford crucial insights about migrant victims' journeys that cannot be discerned in quantitative, large-scale data. The DACR concluded that these nuances are central to understanding why stakeholders are calling for changes to the DDVC, and why the evidence suggests these changes are warranted.

Case studies presented by the sector demonstrate the complexity of migrant victims' lives and immigration statuses, and how these are directly impacted by their experiences of abuse. This complexity means that that descriptions of 'dependent' versus 'self-supporting' migrants which present these as fixed and stable categories, are too simplistic and do not reflect the nuances of victims' lives:

"Ms Y came to the UK in 2011 on a student visa with her husband as a dependant. In 2013 Ms Y made an application to Home Office to continue with her studies, but she could not financially support herself and she had no choice but to leave her dreams of studying. During all this, Ms Y was experiencing [coercive] control, jealousy, sexual violence and emotional abuse from her husband. Within a few months of their arrival, he started having extra marital affairs, and in 2015, he divorced Ms Y.

"Ms Y now was an over stayer and there was a gap in her immigration from 2015 – 2018. During this time she met a British man and married him. The second husband made an application to Home Office for her indefinite leave to remain on a spousal visa. The application was refused in September 2019. Ms Y put in an appeal in October 2019" (SBS, the Angelou Centre and S4S, 2020).

As discussed in section 3.2 of the DACR, economic and 'bureaucratic' abuse can itself leave migrant victims vulnerable to destitution, including those who were economically active and/or self-supporting prior to entering a relationship with the perpetrator.

Similarly, researchers identified evidence submitted to the HOR by SBS, the Angelou Centre and S4S that bears on why asylum seekers and victims of trafficking may require flexible/

interim support through the No Recourse Fund: “The project funds women for direct costs for accommodation and subsistence from the first point of contact when their status may be unclear and until they have obtained support from social services or made an application to remain in the UK and accessed funds under the DDVC or Asylum Support (NASS)” (SBS, the Angelou Centre and S4S, 2020). Even for migrant victims who were able to access timely support via the NASS, there were identified reasons why accessing support by a ‘by and for’ ending VAWG organisation was preferred in some cases, whether due to more specialised support, fewer bureaucratic hurdles to negotiate, or having access to gender-specific and gender-sensitive spaces:

“A woman who was homeless and on the streets was in contact with eight agencies before she received help; once in NASS accommodation, it took a further four months to get a decision about Section 4 support” (Thiara, 2019: 32)

“Where women had lived in NASS accommodation, they found this ‘very uncomfortable’” (Thiara, 2019: 12).

Finally, researchers were able to identify supporting evidence in the HOR evidence submissions from Southall Black Sisters, the Angelou Centre and Safety4Sisters North West (2020) and Thiara (2019) explaining why stakeholders felt the DDVC should be extended beyond the three-month timeframe:

“Women on non-spousal visas required support for longer and **those supported for three months or over were mostly non-spousal women and were variously assisted for between three to eight months (three were complex spousal visa cases due to various reasons including difficulty gathering evidence, abandonment, and revocation of spouse visa and hence required longer support). [...]** **Both non-spousal visa cases and complex spousal visa cases typically required up to six-eight months of support**” (Thiara, 2019: 10).

It is worth highlighting that the quote above is taken from the pilot evaluation report for the No Recourse Fund, which was **cited in the HOR in support of their claim** that few migrant victims require support beyond three months. This interpretation of the evidence by the HOR radically differs from both the factual statement presented by the author – that women typically required six to eight months’ support – and the sector’s takeaway from this evidence that there is a need for more flexibility and ‘slack’ in the timescales to respond to the complex challenges faced by migrant victims, particularly those on non-spousal visas.

Researchers would recommend that in instances where the HOR is offering a markedly different interpretation/use of evidence originally provided by stakeholders, this should be clearly flagged and justified. This would have reduced concerns around selective presentation of evidence and militated against charges of bias.

4 Conclusions and recommendations

The conclusions in this report are organised under three themes that emerged during the process of critically appraising the evidence submitted to the HOR by stakeholders, evaluating the claims made in the HOR in light of this evidence (including claims around gaps and insufficiencies in the evidence), and identifying ‘missing’ evidence which was not referenced in the HOR despite being submitted by expert sector organisations.²⁵ These are:

1. Lack of clarity on the selective focus on certain types of evidence over others
2. Trustworthy and relevant sources of evidence from expert sector organisations were selectively omitted
3. Gaps in communication, particularly in relation to the lack of a published ToR.

In light of the DACR findings, researchers have identified six recommendations for future Home Office reviews and the SMV pilot.

Recommendations for future reviews

1. The Home Office stated that “we need a better evidence base” (S.58, p.20). However, critical appraisal of evidence submissions which were provided to the Home Office but not referenced in the HOR suggests that there is growing robust evidence available to guide policy decisions presently. **The DACR recommends that**, if future reviews on the topic of support for migrant victims are carried out, these should be expanded to reflect other equally robust submissions made by the sector and/or to clearly explain and justify the reliance on some forms of evidence and the omission of others. In order to support the rigour of any future reviews on this subject, and to avoid redundancy, DACR researchers recommend undertaking a rapid evidence assessment (REA).

While academic evidence reviews on migrant victims of domestic abuse in the UK are relatively sparse, the HOR would have been strengthened by an REA to fully grasp the existing evidence base before/in addition to calling for new information (see Adisa, 2019)²⁶. Undertaking an REA of grey literature, academic research and other forms of published evidence prior to/in addition to soliciting evidence from the sector would be valuable as it would enable reviewers to avoid duplication (e.g. calling for more information on questions where there is already a robust evidence base; soliciting new submissions from organisations who have already provided published written evidence in the recent past, as with the 2019 Joint Committee submissions), and placing additional pressure on the VAWG sector to collect and present evidence when existing grey literature/academic research may be a better ‘fit’ for the forms of evidence reviewers are seeking and regard as credible.

REAs were developed in the context of an increasing emphasis on evidence-informed policy, and the need for a quick, reliable method of “accessing, harnessing and using the

²⁵ The DAC has also been given access to the 100 case files considered as part of the Stage 1 of the Home Office Review, and the DAC will be analysing these separately to contribute to the report’s overall conclusions

²⁶ Adisa O. (2019). [The effectiveness of interventions supporting migrant victims/survivors of domestic abuse: An evidence brief. University of Suffolk](#)

best available research evidence for effective policy making” (Bevan *et al*, 2014)²⁷. They are less exhaustive than systematic reviews, and are designed to enable the reviewer to quickly get a handle on *what is already known* about an issue, giving a balanced overview of a topic. Carrying out an REA allows reviewers to map and synthesise the evidence within a shortened timeframe while remaining “rigorous and explicit in method” (Bevan *et al*, 2014). Undertaking this process would have allowed for a more targeted evidence-gathering process which may have better fulfilled the Home Office’s expectations around the forms of evidence needed to address the central HOR questions and avoided unnecessary duplication and pressure on the VAWG sector.

2. **The DACR recommends** that future reviews include a ToR, technical appendix on methodology and justification for the selection of certain types of evidence and weight assigned to the type of evidence provided for transparency.
3. Case work and testimonies from experts by experience featured prominently in the submissions provided to the Home Office by the sector, but were not referenced in the HOR. Following critical appraisal of the evidence, the DACR concluded that these forms of evidence provided valuable insights that would not have been available through other (quantitative, aggregated) forms of data favoured in the HOR. However, the omission of this form of evidence from the HOR suggests that less weight was given to these sources of evidence. **The DACR recommends** that future calls for evidence by the Home Office should include a published ToR which clearly stipulates the type of evidence that is required, and outlines how different forms of evidence will be weighted.
4. **The DACR recommends** that ongoing dialogue with expert sector organisations be part of any future review or pilot project. It is unclear whether consultation with the sector ended after the workshops and final call for evidence in March 2020²⁸ or if feedback was sought about the HOR before publication. This is considered to be good practice for most independent reviews and further underscores the importance of reviews being commissioned independently.

VAWG sector organisations are often stretched to maximum capacity and may not always be able to devote significant time to making submissions. However, a ToR would provide transparency on the detail of evidence and timeframe required by the Home Office. An ongoing dialogue with contributors to provide comments on the review findings would have demonstrated the Home Office’s good faith. In order to maintain channels of communication with contributors and forestall charges of misinterpretation/omission of evidence (as featured in stakeholder responses to the HOR), future reviews must be undertaken independently and ensure that contributors have sight of a draft version of the report before publication.

Recommendations for the Home Office to consider through its Support for Migrant Victims (SMV) pilot

5. **The DACR recommends** that the findings in this report are drawn upon to ensure that the SMV pilot is focused on meeting new information gaps identified by the DAC through

²⁷ Civil Service (2013) Rapid Evidence Assessment Toolkit index. Available at: <https://webarchive.nationalarchives.gov.uk/20140402163359/http://www.civilservice.gov.uk/networks/gsr/resources-and-guidance/rapid-evidence-assessment/what-is> (Accessed: 6 May 2021)

²⁸ The SBS and LAWRS joint response to the HOR (2020) states that they and other members of the SUMW coalition received a final call for evidence on 18 March 2020. This was received in the form of an email from the “Home Office’s Domestic Violence Immigration Policy team, with a deadline to respond by 8 April” (SBS and LAWRS, 2020: 4).

its strand of work on migrant victims of domestic abuse. Given the extent of the written evidence provided by stakeholders for the HOR, and, prior to this, for the Joint Committee, as well as the availability of a wider evidence base formed of grey literature and academic research, future work should build on this evidence base rather than duplicating it.

6. **The DACR recommends that** an independent REA be undertaken to inform the evaluation and conclusions of the SMV pilot. This will address the selective bias and transparency issues of the HOR.
7. From the HOR, it is clear that stakeholder concerns about the need to extend the DDVC have been acknowledged. However, it is challenging to find strong justification for the claim made by the HOR that “there is currently a lack of evidence to demonstrate how long individuals who are not currently eligible for the DDVC and how they could be supported to move on from safe accommodation” (HOR, 2020: S.32). The decision made in the HOR seems to be based on the significant financial costs involved, which are not substantiated by evidence in the HOR. **The DACR recommends** that the Home Office implements robust evaluation/evidence-gathering procedures during the course of the SMV pilot to establish the costs of accommodating and supporting migrant victims who are not currently eligible for the DDVC.

5 Appendix

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5.1 CEBM Critical Appraisal of a Case Study checklist²⁹

1. Did the study address a clearly focused question/issue?
2. Is the research method (study design) appropriate for answering the research question?
3. Are both the setting and the subjects representative with regard to the population to which the findings will be referred?
4. Are the methods for collecting data clearly described?

²⁹ Centre for Evidence Based Management (July 2014), Critical Appraisal Checklist for a Case Study. Retrieved 07/05/2021 from <https://www.cebma.org>

5. Are the methods for analysing the data likely to be valid and reliable? Are quality control measures used?
6. Was the analysis repeated by more than one researcher to ensure reliability?
7. Is the researcher's perspective clearly described and taken into account?
8. Are the results credible, and if so, are they relevant for practice?
9. Are the conclusions drawn justified by the results?
10. Are findings transferable to other settings?

5.2 Codes used to analyse evidence submitted to the HOR, as per the CEBM checklist

Before beginning the review process, researchers had initially developed nine pre-established or 'deductive' codes to analyse the data, guided by the CEBM Critical Appraisal of a Case Study checklist. This preliminary review stage enabled researchers to familiarise themselves with the evidence, and to assess the checklist's appropriateness as an analytical framework for the documents. During this stage, researchers developed a further six 'inductive' or data-driven codes, based on emerging patterns or ambiguities within the data.

Code	Meaning	Relevance for appraisal
A review of a sample number of cases (inductive)	HOR sample cases	Understanding HOR methodology
Selective bias (deductive)	Questions reflect biased framing of the problem Evidence is presented selectively	Undermines the trustworthiness of the findings
Evidence from expert sector organisation (inductive)	Evidence submitted by a specialist organisation with relevant knowledge and experience	Experiential evidence supports trustworthiness of findings
Expertise by experience (deductive)	Victim-survivor point of view included	Contextual evidence supports trustworthiness of findings
Independent evaluation (deductive)	Evidence collected via impartial persons/process	Independent persons/processes supports trustworthiness of findings
Justified conclusions (deductive)	Statement is clearly grounded in and supported by evidence presented	Clear and well-justified reasoning supports trustworthiness of findings
Not referenced in HOR (inductive)	Evidence is not cited in the HOR	Identifying patterns in the HOR use of evidence, and understanding the reasoning underlying these
Referenced in HOR (inductive)	Evidence is cited in the HOR	Identifying patterns in the HOR use of evidence, and understanding the reasoning underlying these

Representative setting/scope (deductive)	Evidence gathered in contexts representative of those in which review findings will be applied	Supports the relevance of the evidence to the HOR
Representative subjects (deductive)	The victim-survivors whose point of view is included in the evidence is representative of the wider population of victim-survivors to whom the review findings will be applied	Supports the relevance of the evidence to the HOR
Reputable source (deductive)	Study/persons/organisation cited as a source of evidence is a reliable source of knowledge on the subject	Supports the trustworthiness of the evidence
Transferability (deductive)	The findings are transferable to other settings and groups	Supports the evidence's relevance to the HOR
Transparency/auditability (deductive)	The process for collecting and analysing data is thoroughly documented and replicable	Supports the trustworthiness of the evidence
Triangulating evidence (inductive)	References to other data sources (research, grey literature) in support of claims	'Triangulating' (or cross-referencing and appraising) the evidence cited in support of a statement/argument enabled researchers to assess its credibility
Identifying unsubstantiated claims (inductive)	Claims for which supporting evidence is not provided	Claims which are not supported by the evidence are less trustworthy

5.3 Evidence provided by VAWG sector

Table 4: Evidence provided by the VAWG sector to DACR researchers

Report/evidence submission from the VAWG sector	Type of evidence
Women's Aid (2020). <i>Protection for Migrant Women</i> . Evidence submission	Secondary evidence from specialist 'by and for' sector and independent sources, appeal to international human rights convention (<i>Istanbul Convention</i>), migrant victim case studies, prior research reports by Women's Aid
End Violence Against Women (2019). <i>Migrant women who are victims of domestic abuse May 2019 Briefing</i> <i>Roundtable meeting with Caroline Noakes, Immigration Minister, and Victoria Atkins, Minister for Crime, Safeguarding and Vulnerability</i>	Secondary evidence from specialist 'by and for' sector and independent sources, appeal to international human rights convention (<i>Istanbul Convention</i>)

Report/evidence submission from the VAWG sector	Type of evidence
SUMW/LAWRS (2018). <i>Safe Reporting of Crime for Migrants with Insecure Immigration Status: Roundtable Report</i>	<p>Evidence from key stakeholders, including the Open Society Foundation, the ending VAWG sector and independent journalist Natalie Bloomer.</p> <p>Claims and recommendations grounded in appeals to national legal and statutory guidance (<i>Human Rights Act, 1998; Statutory Guidance framework: Controlling or Coercive behaviour in an intimate or Family Relationship, 2015</i>) international human rights convention (<i>Istanbul Convention</i>) examples of good practice in policing internationally, case studies, case work/service user statistical data, experiential evidence and systems knowledge from practice, as well as presenting secondary evidence from ending VAWG and specialist 'by and for' organisations and independent sources</p>
McIlwaine, C., Granada, L. & Valenzuela-Oblitas, I. (2019). <i>The Right to be Believed Migrant women facing Violence Against Women and Girls (VAWG) in the 'hostile immigration environment' in London</i>	<p>Primary, mixed methods research with a diverse group of migrant women living in London and the specialist services that support them. Incorporates survey research with 50 migrant women, semi-structured interviews with 11 women with current or previous insecure immigration status and with 10 representatives from specialist organisations, and two focus groups with migrant organisation professionals and service users</p>
SUMW (2020) <i>Review into Support Levels for Migrant Victims of Domestic Abuse. Evidence from the Step Up Migrant Women Coalition.</i> Evidence submission	<p>Evidence from a coalition of more than 50 'by and for' organisations, migrant groups, VAWG sector and human rights organisations; led by LAWRS.</p> <p>Claims and recommendations grounded in appeals to national statutory guidance (<i>Statutory Guidance framework: Controlling or Coercive behaviour in an intimate or Family Relationship, 2015</i>) international human rights convention (<i>Istanbul Convention</i>) secondary evidence from independent sources, prior research by Women's Aid and organisational data from Rights of Women</p>
SBS, the Angelou Centre & S4S (2020) <i>Recourse to Safety: Working Together to Keep Women with No Recourse to Public Funds (NRPF) Safe and Secure</i>	<p>Primary evidence from specialist 'by and for' partner organisations delivering the Recourse to Safety project. Incorporates case work/service user statistical and outcome data, case studies, experiential evidence, and systems knowledge from practice</p>
SBS (2020) <i>Home Office Review into support levels for migrant victims of domestic abuse: Last call for evidence</i>	<p>Primary and secondary evidence from specialist 'by and for' ending VAWG organisation. Incorporates casework/service user statistical data, case studies and experiential evidence and systems knowledge from practice, and references secondary evidence from the NRPF Network and supporting findings from the Thiara (2019) evaluation of the No Recourse Fund pilot</p>

Report/evidence submission from the VAWG sector	Type of evidence
Thiara, R. (2019) <i>Safe and Secure: The No Recourse Fund. Report of Findings</i>	<p>Primary, mixed methods research with a diverse group of migrant women living in England and Scotland. Incorporates survey research with 70 participants (women and supporting organisations) interviews and follow-up with 18 women supported via the Fund, three group discussions with women's organisations, individual discussion and survey feedback from agencies, plus discussion with staff administering the Fund.</p> <p>Findings and recommendations further contextualised and supported by reference to secondary evidence from reputable sources</p>

5.4 Joint Committee on the Draft Domestic Abuse Bill evidence

Table 5: Overview of the Joint Committee on the Draft Domestic Abuse Bill evidence

Joint Committee	Evidence received
House of Lords and House of Commons (2019) <i>Joint Committee on the Draft Domestic Abuse Bill Oral evidence: Draft Domestic Abuse Bill, HC 2075, Tuesday 21 May 2019</i>	<p>I: Oral evidence from witnesses Councillor Simon Blackburn, Chairman of the LGA Safer and Stronger Communities Board, Local Government Association; and Hannah Gousy, Policy and Public Affairs Manager, Crisis.</p> <p>II: Oral evidence from witnesses Victoria Atkins MP, Parliamentary Under Secretary of State for Crime, Safeguarding and Vulnerability and Parliamentary Under Secretary of State (Minister for Women), Home Office; Edward Argar MP, Parliamentary Under Secretary of State, Ministry of Justice</p>
House of Lords and House of Commons (2019) <i>Joint Committee on the Draft Domestic Abuse Bill Oral evidence: Draft Domestic Abuse Bill, HC 2075, Wednesday 22 May 2019</i>	I: Oral evidence from witnesses Heather Wheeler MP, Parliamentary Under Secretary of State, Ministry of Housing, Communities and Local Government; and Jackie Doyle-Price MP, Parliamentary Under Secretary of State for Mental Health, Inequalities and Suicide Prevention
House of Lords and House of Commons (2019) <i>Joint Committee on the Draft Domestic Abuse Bill; Draft Domestic Abuse (including the Bill First Report of Session 2017–19)</i>	The Joint Committee was appointed to undertake pre-legislative scrutiny of the Draft DA Bill. The Committee received a total of 539 written submissions and heard evidence from 36 witnesses, including representatives from specialist services for migrant victims

5.5 Home Office workshop summaries

Table 6: Home Office summaries of workshops with stakeholders

Evidence provided by Home Office	Type of evidence
Home Office workshop summary: Various (2019). <i>Workshop 1 – Support and accommodation for victims of domestic abuse who are migrants</i>	Oral evidence from ending VAWG sector, human rights and civil liberties NGOs based on casework/service user statistical data, experiential evidence, and systems knowledge from practice
Home Office workshop summary: Various (2019). <i>Workshop 2 – Support and problems encountered by individuals from EEA and EU countries and their family members who are victims of domestic abuse</i>	Oral evidence from European Settlement Scheme (EUSS) Policy Team (Home Office), ending VAWG sector, human rights and civil liberties NGOs based on casework/service user statistical data, experiential evidence, and systems knowledge from practice
Home Office workshop summary: Various (2019). <i>Workshop 3 – To be as informed as possible about the concerns expressed to the Joint Committee about information sharing between the Police and Immigration Enforcement. To better understand the victim’s journey through the system</i>	Oral evidence from Immigration Enforcement, the Metropolitan Police Service, the Equality and Human Rights Commission, ending VAWG sector, human rights and civil liberties NGOs based on casework/service user statistical data, experiential evidence, and systems knowledge from practice

5.6 Responses to the HOR by the VAWG sector

Table 7: Responses from the VAWG sector to the HOR findings

Response from ending VAWG sector	Type of evidence/information presented
SBS & LAWRS (2020). <i>Migrant Victims of Domestic Abuse Review Findings: A response by Southall Black Sisters and Latin American Women’s Rights Service</i>	Chronology of engagement with the Review, with extensive reference to evidence submissions (including Thiara, 2019 pilot evaluation)
Rights of Women (2020). <i>Response to the Migrant Victims of Domestic Abuse Review Findings of July 2020: Domestic Abuse Bill 2020</i>	Primary and secondary evidence from ending VAWG sector, including case work/service user statistical data, experiential and systems knowledge from practice and contextual evidence from work with migrant victims

5.7 Claims made in the HOR regarding evidence submitted by the sector – triangulating evidence

Table 3: Claims made in the HOR regarding evidence submitted by the sector – triangulating evidence

Claim	Source cited or referred to	Able to triangulate within the evidence submitted by the sector to the HOR?
<p>1. “At the workshop, we were told that access to a refuge space is often dependent upon a victim being able to pay for that space. Refuge buildings are usually houses adapted for multiple occupation and rented from a housing association, local authority or similar landlord. Most refuges are part-funded through local government grants and fundraising. They make up the remainder of their funding (often around 50%) through housing benefit, paid to them through the victims they are supporting” (Home Office, 2020: S.18, p. 11)</p>	<p>Women’s Aid (2018). <i>Funding a National Network of Refuges</i></p>	<p>Yes: “Currently, refuges are primarily funded through two key funding streams: Rent and related service charges are funded through housing benefit, which on average makes up about half of a refuge’s income” (Women’s Aid, 2018: 4)</p>
<p>2. “We were told that if a migrant victim is not eligible for the DDVC it is difficult for them to access a refuge space as, from a funding perspective, it is unsustainable for many refuges to support victims... who are unable to pay for their space through benefits. 21. This was supported both by our conversation with refuge managers, and by evidence from Women’s Aid’s ‘No Woman Turned Away’ project. Of the 977</p>	<p>Conversation with refuge managers</p>	<p>No: researchers were unable to access the record of this discussion</p>

Claim	Source cited or referred to	Able to triangulate within the evidence submitted by the sector to the HOR?
<p>victims supported by the project from January 2016 to January 2019, 231 (24%) were unable to access public funds” (Home Office, 2020: S.20-21, p. 11)</p>		
<p>3. “We were told that if a migrant victim is not eligible for the DDVC it is difficult for them to access a refuge space as, from a funding perspective, it is unsustainable for many refuges to support victims who are unable to pay for their space through benefits. 21. This was supported both by our conversation with refuge managers, and by evidence from Women’s Aid’s ‘No Woman Turned Away’ project. Of the 977 victims supported by the project from January 2016 to January 2019, 231 (24%) were unable to access public funds” (Home Office, 2020: S.20-21, p. 11)</p>	<p>Women’s Aid No Woman Turned Away project reports, 2017-2019.</p>	<p>Yes: Women’s Aid reports show that in its first year the NwTA project supported 404 women, among whom 110 (or 27.23%) had NRPF (Women's Aid, 2017: 22)</p> <p>Second year: NwTA project supported 264 women, among whom 61 (or 23.1%) had NRPF (Women's Aid, 2018: 6)</p> <p>Third year: NwTA project supported 309 women, among whom 60 (or 19.4%) had NRPF (Women's Aid, 2019: 9)</p> <p>Over the three-year period, 231 women with NRPF supported through project (24% of total)</p>
<p>4. “We were told that some refuges have funds of their own that they can use to support a victim who does not have access to public funds. These funds are often generated through local fund-raising initiatives; however, stakeholders at the workshops said this was not the norm and most refuges are simply unable to provide spaces</p>	<p>Home Office workshop summary: Various (2019). <i>Workshop 1 – Support and accommodation for victims of domestic abuse who are migrants</i></p>	<p>Yes: “Women’s Aid and Refuge told us that half of refuge funding comes from housing support. Both agreed it was very difficult to support a woman with NRPF, although this has been funded through charitable reserves in some cases [...] All stakeholders from</p>

Claim	Source cited or referred to	Able to triangulate within the evidence submitted by the sector to the HOR?
<p>for migrant victims who do not have access to public funds. As such, the expert organisations recommended that the DDVC be expanded to include all migrants, regardless of immigration status”</p>		<p>the sector argued that the DDVC should be opened to all migrants”</p>
<p>5. “What was unclear from the evidence we received was the immigration status of those who needed support, and particularly whether any other support was available to them. For example, we were provided with evidence that suggested that some individuals on visitor and student visas had come forward for support. However, individuals on these visas must prove that they are able to support themselves financially in order to be granted leave to enter the UK, so it was not clear why they might have been in need” (Home Office, 2020: S.23, p.11-12)</p>	<p>Evidence on migrant victims with visitor and student visas in need of support presented in multiple submissions – see Thiara (2019) and SBS, the Angelou Centre and S4S (2020)</p>	<p>Yes: “Migrant women who are not on spousal visas, including students and domestic workers, are excluded from these vital routes to safety [DDVC and DV Rule]. These women continue to face formidable barriers when attempting to escape abuse”. Service user data from three Recourse to Safety partner organisations shows that 12.5% of women supported through the project between 1 April 2019 and 31 March 2020 entered the UK on “Other visas e.g. family, visitor, student, work” (SBS, the Angelou Centre and S4S, 2020)</p>
<p>6. “What was unclear from the evidence we received was the immigration status of those who needed support, and particularly whether any other support was available to them. For example, we were provided with evidence that suggested that some individuals on</p>	<p>Evidence on migrant victims with visitor and student visas in need of support presented in multiple submissions – see Thiara (2019) and SBS, the Angelou Centre and S4S (2020)</p>	<p>No: reviewers identified supporting evidence provided as part of the evidence submissions that explains and justifies this need for support.</p>

Claim	Source cited or referred to	Able to triangulate within the evidence submitted by the sector to the HOR?
<p>visitor and student visas had come forward for support. However, individuals on these visas must prove that they are able to support themselves financially in order to be granted leave to enter the UK so it was not clear why they might have been in need" (Home Office, 2020: S.23, p.11-12)</p>		<p>Case studies presented by the sector evidence the complexity of migrant victims' lives and immigration statuses. This complexity means that descriptions of 'dependent' versus 'self-supporting' migrants which present these as fixed, stable categories, are too simplistic and do not reflect the nuances of victims' lives:</p> <p>"Ms Y came to the UK in 2011 on a student visa with her husband as a dependant. In 2013 Ms Y made an application to Home Office to continue with her studies, but she could not financially support herself and she had no choice but to leave her dreams of studying. During all this Ms Y was experiencing [coercive] control, jealousy, sexual violence and emotional abuse from her husband. Within a few months of their arrival, he started having extra marital affairs, and in 2015, he divorced Ms Y.</p> <p>Ms Y now was an over stayer and there was a gap in her immigration from</p>

Claim	Source cited or referred to	Able to triangulate within the evidence submitted by the sector to the HOR?
		2015 – 2018. During this time she met a British man and married him. The second husband made an application to Home Office for her indefinite leave to remain on a spousal visa. The application was refused in September 2019. Ms Y put in an appeal in October 2019” (SBS, the Angelou Centre and S4S, 2020)
<p>7. “Additionally, we saw evidence that victims of trafficking, asylum seekers, and those granted discretionary leave had also been provided with support. There is, however, existing support available for victims of trafficking through the National Referral Mechanism (NRM), asylum seekers who would otherwise be destitute are supported by the Home Office, and those with Discretionary Leave are granted recourse to public funds” (Home Office, 2020: S.24, p.12)</p>	<p>Evidence on migrant victims of trafficking/ asylum seekers in need of support presented in multiple submissions – see Thiara (2019) and SBS, the Angelou Centre and S4S (2020)</p>	<p>Yes: service user data from three Recourse to Safety partner organisations shows that 17.5% of migrant victims supported through the project between 1 April 2019 and 31 March 2020 were an “Asylum seeker, dependent of asylum seeker or failed asylum seeker” (SBS, the Angelou Centre & S4S, 2020)</p>
<p>8. “Additionally, we saw evidence that victims of trafficking, asylum seekers, and those granted discretionary leave had also been provided with support. There is, however, existing support available for victims of trafficking through the National Referral Mechanism (NRM),</p>	<p>Evidence on migrant victims of trafficking/ asylum seekers in need of support presented in multiple submissions – see Thiara (2019) and SBS, the Angelou Centre and S4S (2020)</p>	<p>No: researchers identified evidence provided as part of the evidence submission that bears on why asylum seekers and victims of trafficking may require flexible/interim support through No Recourse Fund:</p>

Claim	Source cited or referred to	Able to triangulate within the evidence submitted by the sector to the HOR?
<p>asylum seekers who would otherwise be destitute are supported by the Home Office, and those with Discretionary Leave are granted recourse to public funds” (Home Office, 2020: S.24, p.12)</p>		<p>“The project funds women for direct costs for accommodation and subsistence from the first point of contact when their status may be unclear and until they have obtained support from social services or made an application to remain in the UK and accessed funds under the DDVC or Asylum Support (NASS)” (SBS, the Angelou Centre and S4S, 2020)</p>
<p>9. “Additionally, it was mentioned that some victims experienced a delay in obtaining a fresh British Resident Permit (BRP) to confirm that recourse to public funds had been given. These delays often impacted on migrants’ ability to claim benefits from DWP, and we heard that some refuges were therefore refusing to grant migrant victims a space until the BRP had been received. Southall Black Sisters presented evidence to show that they had supported some migrants on spousal visas who had experienced these delays. However, the refuge managers we spoke to said that they accept migrant victims based solely on the Home Office letter confirming that the</p>	<p>Home Office workshop summary: <i>Various (2019) Workshop 1 – Support and accommodation for victims of domestic abuse who are migrants</i></p>	<p>Yes: “South Hall Black Sisters explained that this very much depends on whether the victim is entitled to DDVC or not. They explained that, even where victims have been granted under the DDVC, refuges are turning victims away because they are only entitled to benefits for three months. It was claimed that access to refuges is further delayed by the delay in the issuing of BRPs”</p>

Claim	Source cited or referred to	Able to triangulate within the evidence submitted by the sector to the HOR?
DDVC has been granted” (Home Office, 2020: S.26, p.12)		
10. “Additionally, it was mentioned that some victims experienced a delay in obtaining a fresh British Resident Permit (BRP) to confirm that recourse to public funds had been given. These delays often impacted on migrants’ ability to claim benefits from DWP, and we heard that some refuges were therefore refusing to grant migrant victims a space until the BRP had been received. Southall Black Sisters presented evidence to show that they had supported some migrants on spousal visas who had experienced these delays. However, the refuge managers we spoke to said that they accept migrant victims based solely on the Home Office letter confirming that the DDVC has been granted” (Home Office, 2020: S.26, p.12)	Conversation with refuge managers	No: researchers were unable to access the record of this discussion
11. “We received conflicting feedback about whether the current three-month timeframe for support under the DDVC was long enough. Under the existing arrangement, where an application for the DVILR is made within three months, support will continue under the DDVC until that application has been decided rather than end at the three-month mark.	Home Office internal management information	No: internal/sensitive data

Claim	Source cited or referred to	Able to triangulate within the evidence submitted by the sector to the HOR?
<p>The Home Office’s internal management information shows that the majority of DVILR applications are made within three months” (Home Office, 2020: S.27, p.12)</p>		
<p>12. “Some organisations mentioned that refuges were turning migrant victims away in the belief that they would only be eligible for housing benefits for three months (we were told that the average length of stay in a refuge can be anywhere from four months to a year)” (Home Office, 2020)</p>	<p>Home Office workshop summary: <i>Various (2019) Workshop 1 – Support and accommodation for victims of domestic abuse who are migrants</i></p>	<p>Yes: “South Hall Black Sisters explained that this very much depends on whether the victim is entitled to DDVC or not. They explained that, even where victims have been granted under the DDVC, refuges are turning victims away because they are only entitled to benefits for three months”</p>
<p>13. “We were told that some migrants struggled to obtain legal support and the necessary documentation for their DVILR application within the three-month period” (Home Office, 2020)</p>	<p>Evidence on duration of DVILR application process for ‘complex’ cases presented in multiple submissions – see Thiara (2019) and SBS, the Angelou Centre and S4S (2020)</p>	<p>Yes: “Women on non-spousal visas required support for longer and those supported for three months or over were mostly non-spousal women and were variously assisted for between three to eight months (three were complex spousal visa cases due to various reasons including difficulty gathering evidence, abandonment, and revocation of spouse visa and hence required longer support). [...] Both non-spousal visa cases and complex spousal visa cases</p>

Claim	Source cited or referred to	Able to triangulate within the evidence submitted by the sector to the HOR?
		typically required up to six-eight months of support” (Thiara, 2019: 10)
<p>14. “In contrast, we were also told that the current system worked well for those currently eligible for the DDVC, but that, if the DDVC were expanded to cover other migrant groups who cannot apply for the DVILR, three months’ support would not be long enough for many of them to resolve their situation and move on from the refuge. However, data from the 2019 Southall Black Sisters’ report ‘Safe and Secure’ shows that of the 55 women they supported for which they had data, only seven were supported for longer than three months” (Home Office, 2020: S.29, p. 12-13)</p>	<p>Home Office workshop summary: <i>Various (2019) Workshop 1 – Support and accommodation for victims of domestic abuse who are migrants</i></p>	<p>“Southall Black Sisters... told us that victims covered by the DDVC are usually able to apply for DVILR within three months. They told us that where three months is not working is for the non-spousal visa applicants who have more complex needs”</p>
<p>15. “In contrast, we were also told that the current system worked well for those currently eligible for the DDVC, but that, if the DDVC were expanded to cover other migrant groups who cannot apply for the DVILR, three months’ support would not be long enough for many of them to resolve their situation and move on from the refuge. However, data from the 2019 Southall Black Sisters’ report ‘Safe and Secure’ shows that</p>	<p>Thiara, R. (2019). <i>Safe and Secure: The No Recourse Fund. Report of Findings</i></p>	<p>No: this conclusion is based on a selective reading or misinterpretation of the presented evidence. Both the pilot evaluation (Thiara, 2019) and the subsequent evidence submission from Recourse to Safety partner organisations (SBS, the Angelou Centre and S4S, 2020) state that the length of support needed is individually variable and predicated on</p>

Claim	Source cited or referred to	Able to triangulate within the evidence submitted by the sector to the HOR?
<p>of the 55 women they supported for which they had data, only seven were supported for longer than three months” (Home Office, 2020: S.29, p. 12-13)</p>		<p>multiple factors such as “the complexity of immigration matters, access to legally aided lawyers, to timely crisis support etc. [...Additionally], the evaluation by Dr Ravi Thiara of the SBS NRF in <i>Safe and Secure</i> suggests that overall, both non-spousal visa cases and complex spousal visa cases typically require up to six to eight months of support” (SBS, the Angelou Centre and S4S, 2020)</p>

5.8 Critical Appraisal checklist – McIlwaine et al (2019)

1. McIlwaine, C., Granada, L. & Valenzuela-Oblitas, I. (2019). *The Right to be Believed: Migrant women facing Violence Against Women and Girls (VAWG) in the 'hostile immigration environment' in London*

Appropriate research design?	Representative setting and subjects?	Data collection methods	Data analysis	Positionality	Credibility	Justified conclusions?	Transferability	Trustworthiness, (Assessed) value	Use of evidence
Yes: Mixed method study design designed to build an evidence base for policy recommendations	Yes: London-based migrant women with varying immigration statuses and countries of origin	Survey research with 50 migrant women, semi-structured interviews with 11 migrant women with current or previous insecure immigration status, with 10 representatives from organisations supporting them, including two focus groups with professionals and migrant women. The use of survey research in VAWG prevalence studies is well-established methodology	Descriptive/ inductive approach, presenting overview of survey and interview findings. Limited details regarding data analysis processes. Not uncommon for grey literature	Human rights and intersectional perspective – "Led by migrant and black and minority ethnic women , the project and campaign propose to increase awareness about the challenges faced by migrant women survivors of VAWG when seeking help from statutory and voluntary organisations, to influence key decision-makers at London and national levels. This is to	Highly credible: Primary research with migrant survivors and specialist organisations that support them – findings consistent with wider evidence base presented across evidence submissions	Yes: Report features extensive evidence from focus group participants, interviewees and survey respondents. In some cases, authors note that their understanding of participant's experience diverged from participant's own (e.g. psychological violence and marital rape were not always perceived by the victim as a form of VAWG). Where their understandings differ, this is noted. Analysis of participant testimony is mostly	Participants from a range of backgrounds/ countries of origin. London-based study – but many of the challenges migrant women/ professionals disclosed are also applicable at a national level (e.g. information sharing by police, NRPF, bureaucratic and economic abuse based on/affecting migration status)	Yes: undertaken by reputable source with relevant research expertise (see McIlwaine & Evans, 2018)	Not referenced in HOR Referenced in: Thiara (2019). <i>Safe & Secure</i> Women's Aid (2020). <i>Protection for Migrant Women</i> evidence submission Post-review references: SBS and LAWRS (2020). <i>Migrant Victims of Domestic Abuse Review Findings: A response by Southall Black Sisters and Latin American Women's Rights Service</i>

				<p>ensure that the rights of victims of VAWG take precedence over control of immigration status, so that they are able to report violence safely and obtain support without fear of destitution/ detention/ deportation” (McIlwaine <i>et al</i>, 2019: 3)</p>		<p>summarising/ descriptive. Where extrapolation from and/or inferences about participant experiences is included, these are often grounded in the wider literature</p>			
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Table 94: Critical appraisal checklist – McIlwaine *et al* (2019)

5.9 Critical Appraisal checklist – Thiara (2019)

2. Thiara, R. (2019). *Safe and Secure: The No Recourse Fund. Report of Findings*

Appropriate research design?	Representative setting & subjects?	Data collection methods	Data analysis	Positionality	Credibility	Justified conclusions?	Transferability	Trustworthiness, (Assessed) value	Use of evidence
Yes: Mixed method evaluation of NRF pilot	70 women (and their children) supported via the NRF. Predominantly from South Asian, African and Eastern European countries of origin Varied and complex immigration statuses, including spousal and non-spousal visas	70 surveys completed by women and organisations (including 13 outcome measures) interviews or follow up with 18 women, three group discussions with women's organisations. The use of survey research in VAWG prevalence studies is well-established methodology	Descriptive/ inductive approach presenting overview of survey data, women's perspectives and professionals' responses. Limited details regarding data analysis processes. Not uncommon for grey literature	Researcher conducting evaluation is independent/ academic rather than internal to organisation. Situated as critical of impacts of Hostile Environment policies on migrant victims, based on existing body of evidence (introduction and context)	Primary research with migrant survivors and specialist organisations that support them – findings consistent with wider evidence base presented across evidence submissions	Yes: claims and recommendations are supported by evidence from survey respondents, focus group participants and interviewees	Yes: participants from a range of backgrounds/ countries of origin. Majority of women supported living in London (around 58%) – but many of the challenges migrant women/ professionals disclosed are also applicable at a national level (e.g. NRPF, bureaucratic and economic abuse based on/affecting migration status)	Yes: undertaken by reputable source with relevant research expertise (see Thiara, R. & Gill, A. (2010). <i>Violence against Women in South Asian Communities: Issues for Policy and Practice</i> , London, Jessica Kingsley)	Referenced in HOR Referenced in: SBS, the Angelou Centre and S4S (2020). <i>Recourse to Safety: Working Together to Keep Women with No Recourse to Public Funds (NRPF) Safe and Secure</i> SBS (2020). <i>Home Office Review into support levels for migrant victims of domestic abuse: Last call for evidence</i> Post review references: SBS and LAWRS (2020). <i>Migrant Victims of Domestic Abuse Review Findings: A response by</i>

									<i>Southall Black Sisters and Latin American Women's Rights Service</i> <i>Rights of Women (2020). Response to the Migrant Victims of Domestic Abuse Review Findings of July 2020: Domestic Abuse Bill 2020</i>
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Table 5: Critical appraisal checklist – Thiara (2019)

5.10 Critical Appraisal checklist – McIlwaine & Evans (2018)

3. Mcllwaine, C., Evans, Y. (2018). *We can't Fight in the Dark: Violence Against Women and Girls (VAWG) among Brazilians in London*. King's College London.

Appropriate research design?	Representative setting and subjects?	Data collection methods	Data analysis	Positionality	Credibility	Justified conclusions?	Transferability	Trustworthiness, (Assessed) value	Use of evidence
Yes: Mixed methods primary research	Yes: looking specifically at experiences of Brazilian women in London – relatively young, with over half of survey participants aged between 31-40, and around 20% aged 41-50. Predominantly identify as ethnically White or Mixed. Largely working in professional and related occupations, but mean and median wages lower than those for UK. Most entered the country on non-spousal temporary visas, and around 80% had attained permanent residence. More than 80% lifetime prevalence VAWG/GBV	Quantitative survey with 175 women, 25 in-depth interviews and five focus group discussions, as well as service mapping of organisations based on interviews with representatives from 12 providers. The use of survey research in VAWG prevalence studies is well-established methodology	Descriptive/ inductive approach to presenting findings. Appendix contains details about data collection and processing methods (recording, transcription, translation). Less information about interpretation and analysis. Not uncommon for grey literature	Human rights and intersectional perspective	Highly credible: Findings are consistent with the wider evidence base, e.g. Mcllwaine <i>et al</i> 2019, which also found that language and lack of awareness that some forms of abuse were considered VAWG acted as barriers to reporting/ seeking help Also consistent with international evidence base on 'machismo' as a context for Latin American women's experiences of VAWG	Yes: claims and recommendations are supported by evidence from survey respondents, focus group participants and interviewees	Yes: although the study focuses on the experiences of a specific group of women, many of the issues identified are more widely applicable across UK (e.g. NRPF, resourcing specialist 'by and for' services, establishing a firewall between police and immigration enforcement)	Yes: undertaken by reputable source with relevant research expertise London-focused component of research conducted as part of the wider project entitled 'Healthy, Secure and Gender Just Cities: Transnational Perspectives on VAWG in Rio de Janeiro and London', funded by the Economic and Social Research Council and the Newton Fund	Not referenced in HOR Referenced in: SUMW/ LAWRS (2018). <i>Safe Reporting of Crime for Migrants with Insecure Immigration Status: Roundtable Report</i> Mcllwaine <i>et al</i> (2019). <i>The Right to be Believed: Migrant women facing Violence Against Women and Girls (VAWG) in the 'hostile immigration environment' in London</i>

Table 6: Critical appraisal checklist – Mcllwaine & Evans (2018)

5.11 Critical Appraisal checklist – S4S (2016)

4. S4S (2016). *Migrant Women’s Rights to Safety Pilot Project*

Appropriate research design?	Representative setting and subjects?	Data collection methods	Data analysis	Positionality	Credibility	Justified conclusions?	Transferability	Trustworthiness, (Assessed) value	Use of evidence
<p>Yes: mixed methods internal evaluation of 10 months pilot and exploration of emergent themes during group work – mixed methods, presenting statistical service user data and qualitative/ contextual evidence</p> <p>Case histories for 61 women throughout the course of the pilot project</p>	<p>Varied countries of origin, immigration status, number of children</p> <p>Case histories for 61 women, contextual evidence from survivors (40 group work sessions with 39 women supported)</p>	<p>Collated service user statistical data, referral data, experiential evidence from volunteer facilitating group work, volunteer notes from group work, contextual evidence from women accessing support</p> <p>Due to sensitivity of the topic and participatory approach, unobtrusive/ 'passive' data collection – not asking specific questions or setting agenda</p>	<p>Not discussed in depth. Descriptive/ inductive approach to interpreting themes from group work</p>	<p>Feminist and anti-racist organisation, operating with intersectional and human rights lens: "Safety4Sisters was established to address women with no recourse to public funds and their consequent exclusion from the most basic rights of safety and protection. Additionally, we wanted to highlight the human rights failures that accompany their attempts to live free from gender-based violence. Both our campaigning-based work and our direct project delivery has been directed at assisting migrant women to obtain effective protection and to support them in asserting their fundamental human rights and freedoms" (S4S, 2016: 3)</p>	<p>Highly credible: findings regarding varied and complex immigration status, minoritised and migrant women being disproportionately likely to have been subjected to multiple forms of GBV and perpetrators are consistent with other research</p>	<p>Yes: conclusions clearly grounded in service user data and case studies</p>	<p>Yes: although the study focuses on the experiences of a specific group of women, many of the issues identified are more widely applicable across UK (e.g. NRPf, discrimination, the 'justice gap' experienced by migrant women reporting abuse, social isolation and exclusion)</p>	<p>Yes: although limited in methodological detail, findings are credible, correspond to the wider evidence base, and claims about service user experience are grounded in statistical data and contextual evidence from group work</p>	<p>Referenced in: Thiara (2019). <i>Safe & Secure</i> McIlwaine et al (2019). <i>The Right to be Believed: Migrant women facing Violence Against Women and Girls (VAWG) in the 'hostile immigration environment' in London</i></p>

Table 7: Critical appraisal checklist – Safety4Sisters (2016)

5.12 Critical Appraisal checklist – Bates et al (2018)

5. Bates, L., Gangoli, G., Hester, M. and Justice Project Team (2018). *Policy Evidence Summary 1: Migrant Women*. University of Bristol, Bristol

Appropriate research design?	Representative setting and subjects?	Data collection methods	Data analysis	Positionality	Credibility	Justified conclusions?	Transferability	Trustworthiness, (Assessed) value	Use of evidence
Yes: mixed methods primary research – interviews with 37 women and descriptive statistical analysis of trends in data	Full study based on a convenience sample of 251 women victims of VAWG This strand of evidence from interviews with 37 non-UK/EU nationals (used as proxy for immigration status) Majority of interviewees had leave to remain dependent on a spouse, and had to apply for Indefinite Leave to Remain (ILR) or asylum	Interviews with 37 women Based on subset of data collected as part of the ESRC-funded research project Justice, Inequality and Gender-Based Violence, carried out by the Universities of Bristol, West of England and Cardiff between 2016 and 2018 (wider research study with 251 victims of VAWG)	Descriptive statistics on key characteristics, UK/EU compared to non-EU country of origin women Process for analysing data not described (short evidence briefing)	Not described. Part of a wider academic study on justice, gender inequality and violence – fairly 'neutral' editorial voice	Highly credible: higher prevalence of HBV, FGM and FM, and multiple perpetrators among migrant victims are consistent with other research, as are findings regarding 'justice gap', language barriers and conceptualisation of VAWG	Yes: recommendation grounded in findings and wider evidence base	Yes: nationally relevant/credible findings, although based on small group	Yes: part of a wider project which has already been subject to rigorous peer review by funders	Not referenced in HOR Referenced in: Thiara (2019). <i>Safe & Secure</i>

Table 8: Critical appraisal checklist – Bates *et al* (2018)

5.13 Evidence cited by sector that is not referenced in HOR

Relevant evidence not included in the HOR	Evidence submission referenced in	Original source (if different from evidence submission)	Implications/relevance
<p>1. "More than half of women surveyed by Kings College London and Latin American Women's Rights Service, reported they felt they would not be believed by the police because of their immigration status (54%), with more than half feeling that the police or the Home Office would support the perpetrator over them (52%)"</p>	<p>Women's Aid (2020). <i>Protection for Migrant Women</i>. Evidence submission</p>	<p>McIlwaine, C., Granada, L. & Valenzuela-Oblitas, I. (2019). <i>The Right to be Believed: Migrant women facing Violence Against Women and Girls (VAWG) in the 'hostile immigration environment' in London</i></p>	<p>Evidence that victim' concerns about information sharing regarding their irregular immigration status deters reporting, keeps victims in unsafe situations and contributes to a culture of impunity for perpetrators</p>
<p>2. "Rights of Women told us that the majority of victims they deal with have no access to DDVC"</p>	<p>Home Office workshop summary: <i>Various (2019) Workshop 1 – Support and accommodation for victims of domestic abuse who are migrants</i></p>	<p>"The organisation Rights of Women operates an advice phone line for immigration and asylum issues. Their data for the period 1st April 2018 to 31st March 2019 showed that it consistently received calls from a number of women not on spousal visas or leave. This is extremely alarming and illustrates the fact that there are many migrant women experiencing domestic abuse who are left without adequate support because they are not eligible for the DV rule and DDVC.</p> <p>These women often have to make a choice of either falling into destitution and homelessness or fleeing the abuser as they can't access public funds or remain with the abuser and risk further harm. This is not a meaningful choice, but it is unfortunately the reality." (SUMW Evidence submission, p. 5)</p>	<p>Supports claim that some migrant victims without access to DDVC are vulnerable to destitution</p>

Relevant evidence not included in the HOR	Evidence submission referenced in	Original source (if different from evidence submission)	Implications/relevance
3. "Step Up Women argued one of the biggest barriers is language and that women cannot access support if they do not know it is available to them"	Home Office workshop summary: <i>Various (2019). Workshop 1 – Support and accommodation for victims of domestic abuse who are migrants</i>	"Language barriers also emerged as important for almost half [46%] of the women and there was evidence of women stating that they experienced more violence if they resisted the perpetrator (see below) (Figure 4). Language problems also resulted in complex misunderstandings with some women reporting how they had ended-up being arrested by the police in the place of the perpetrators because they could not explain what had happened to them" (McIlwaine <i>et al</i> , 2019: 17)	Workshop, and supported by McIlwaine <i>et al</i> (2019) evidence submission from LAWRS (a member of the SUMW coalition) Supports claims made by sector regarding disparate outcomes for migrant women, and the 'justice gap' some migrant victims experience
4. "Step Up Migrant Women told us that an additional barrier through the current process is where a victim instructs a new solicitor who does not have access to a copy of the application submitted by the victims' previous solicitor, which can create significant delays"	Home Office workshop summary: <i>Various (2019). Workshop 2 – Support and problems encountered by individuals from EEA and EU countries and their family members who are victims of domestic abuse</i>	Workshop: Unable to triangulate this particular claim to written evidence submitted by sector (and to which reviewers had access)	Evidence of delays in legal process affecting migrant victims
5. Rights of Women claimed it [EEA nationals] was the majority. Refuge told us that it was around 12%, not including family members. They told us that under the EUSS it would be far greater and that, post-Brexit, they are expecting this number to improve Step Up Migrant Women claimed the number is big and that they would follow up with data after the meeting"	Workshop Summaries – SUMW, (2020). <i>Review into Support Levels for Migrant Victims of Domestic Abuse</i> <i>Evidence from the Step Up Migrant Women Coalition.</i> Evidence submission	Workshop: Unable to triangulate these claims to written evidence submitted by sector (and to which reviewers had access)	Regarding proportion of migrant victims supported who are EEA nationals/have relationship with an EEA national, and how this is anticipated to change in the near future (Brexit)

Relevant evidence not included in the HOR	Evidence submission referenced in	Original source (if different from evidence submission)	Implications/relevance
<p>6. "Refuge told us they are expecting an influx of these cases because those who are granted pre-settled status will have NRPF until 2025. They told us that the expectation that refugees will pick up the slack, after facing 50% cuts in funding since 2011, is unrealistic"</p>	<p>SUMW, (2020). <i>Review into Support Levels for Migrant Victims of Domestic Abuse Evidence from the Step Up Migrant Women Coalition.</i> Evidence submission</p>	<p>Workshop: Unable to triangulate this particular claim/argument to written evidence submitted by sector (and to which reviewers had access)</p>	<p>Regarding proportion of migrant victims supported who are EEA nationals/have relationship with an EEA national, and how this is anticipated to change in the near future (Brexit)</p>
<p>7. "End Violence Against Women asked why this guidance is not publicly available. It was argued that guidance is needed so that the treatment of victims is consistent across the board"</p>	<p>Home Office workshop summary: Various (2019). <i>Workshop 3 – To be as informed as possible about the concerns expressed to the Joint Committee about information sharing between the Police and Immigration Enforcement.</i> <i>To better understand the victim's journey through the system</i></p>	<p>"Immigration Enforcement said that the sector and victims perceive that the process leads to automatic arrest and detention, but that this is not the case. It was explained that the police and Immigration Enforcement share information to safeguard vulnerable victims and that the National Command Unit receive training and internal guidance on this End Violence Against Women asked why this guidance is not publicly available. It was argued that guidance is needed so that the treatment of victims is consistent across the board" (Workshop no. 3 summary, p. 9)</p>	<p>Need for consistent, publicly available guidance on when information sharing between police and immigration enforcement is appropriate/required</p>
<p>8. "Reporting VAWG amongst Brazilians in London is limited and hampered by lack of information, shame, fear and insecure immigration status Reporting is affected by a range of different barriers including women not always being aware of what VAWG refers to, especially in relation to emotional/psychological violence. As a result, many are often made aware of VAWG indirectly through accessing other services</p>	<p>SUMW/LAWRS (2018). <i>Safe Reporting of Crime for Migrants with Insecure Immigration Status: Roundtable Report</i></p>	<p>McIlwaine, C. & Evans, Y. (2018). <i>We can't Fight in the Dark: Violence Against Women and Girls (VAWG) among Brazilians in London.</i> King's College London</p>	<p>Evidencing barriers to reporting and help seeking for migrant women, including link to fears around information sharing between police and immigration enforcement</p>

Relevant evidence not included in the HOR	Evidence submission referenced in	Original source (if different from evidence submission)	Implications/relevance
<p>A majority (56%) of women never reported an episode of violence in London, mainly because they thought nothing would be done about it, lack of information, shame and fear of deportation due to insecure immigration status</p> <p>Reporting to the police was mainly a negative experience, especially when women had irregular immigration status”</p>			
<p>9. “The Justice Project team conducted interviews with 251 women victims of VAWG where 37 had insecure migrant status and the other 202 held UK/EU status or ‘secure’ status</p> <p>Key findings include women with insecure migrant status being destitute at higher rates as a result of VAWG and experiencing multiple perpetrators in lifetime. Moreover, police conducted fewer investigations, fewer civil injunctions were provided and fewer migrant women accessed to family court”</p>	<p>SUMW/LAWRS (2018). <i>Safe Reporting of Crime for Migrants with Insecure Immigration Status: Roundtable Report</i></p>	<p>Bates, L., Gangoli, G., Hester, M. and Justice Project Team (2018), <i>Policy Evidence Summary 1: Migrant Women</i>. University of Bristol, Bristol</p>	<p>Disparate outcomes between migrant victims with insecure status and others – supporting evidence for proposed changes to Bill</p>
<p>10. “Responses to Freedom of Information requests in England and Wales from 45 police forces confirm that 27 of these share victims’ details with the home office for immigration control purposes and only three responded that they do not share victims’ information”</p>	<p>SUMW/LAWRS (2018). <i>Safe Reporting of Crime for Migrants with Insecure Immigration Status: Roundtable Report</i></p>	<p>Nye, C., Bloomer, N. & Jeraj, S. (2018). ‘Victims of serious crime face arrest over immigration status’, <i>BBC News</i></p>	<p>Evidence regarding victim concerns about information sharing regarding irregular immigration status</p>

Relevant evidence not included in the HOR	Evidence submission referenced in	Original source (if different from evidence submission)	Implications/relevance
<p>11. "People with 'insecure immigration status' are those whose status is temporary or insecure due to waiting for a decision about their permission to stay, or because they are dependent on their partner's, spouse or other family member's status. Their stay is usually limited, they may be undocumented or do not have legal rights to stay (Equalities and Human Rights Committee, 2017; Safety4Sisters, 2016)"</p>	<p>Mcllwaine, C., Granada, L. & Valenzuela-Oblitas, I. (2019). <i>The Right to be Believed Migrant women facing Violence Against Women and Girls (VAWG) in the 'hostile immigration environment' in London</i></p>	<p>Citing Safety4Sisters report</p>	<p>Additional grey literature evidence on specialist projects supporting migrant women, not referenced in HO review</p>
<p>12. The organisation Rights of Women operates an advice phone line for immigration and asylum issues. Their data for the period 1st April 2018 to 31st March 2019 showed that it consistently received calls from a number of women not on spousal visas or leave</p>	<p>SUMW (2020) <i>Review into Support Levels for Migrant Victims of Domestic Abuse. Evidence from the Step Up Migrant Women Coalition.</i> Evidence submission</p>	<p>Rights of Women organisational data</p>	<p>Supports claim that some migrant victims without access to DDVC are vulnerable to destitution</p>
<p>13. "Based on casework of the three partner organisations in the period 1 April 2019 to 31 March 2020, we estimate that the average length of time between accessing the DDVC and submitting an application for indefinite leave to remain (ILR) is eight weeks. It can range between 3-4 weeks and 18 weeks, although a few complex cases have taken longer up to 29-35 weeks. The variation in time depends on the level of complexity involved in a particular case and being able to obtain timely and sound legal aided</p>	<p>SBS, the Angelou Centre and S4S (2020). <i>Recourse to Safety: Working Together to Keep Women with No Recourse to Public Funds (NRPF) Safe and Secure</i></p>	<p>Organisational/service user data from the Tampon Tax Fund funded joint project:</p> <p>"The majority of women (41%) used the NRF for 10-19 weeks, followed by those using it for 2-9 weeks (24.5%), 20-29 weeks (12%) and 30-39 weeks (10%). Some of the women required on-going support at the time of data collection. The shortest time period that women had been receiving support was 1 day, and the longest period was 46 weeks (almost one year)</p> <p>There is a significant difference in the period of support required for women on spousal visas</p>	<p>Supporting evidence regarding sector claims that the DDVC should be extended, in light of complexity and delays with process of securing ILR</p>

Relevant evidence not included in the HOR	Evidence submission referenced in	Original source (if different from evidence submission)	Implications/relevance
immigration advice and representation. There is often a waiting list due to the lack of legal aided firms practicing immigration law. This can cause significant delays in making applications for ILR”		compared to those on non-spousal visas. Those on spousal visas constituted 13% of the total, and the majority (11%) were on the NRF for 2-19 weeks, while those on non-spousal visas had wider range (from 1 day to 46 weeks) and needed support for much longer as about a quarter (25%) needed support for 20-49 weeks (as stated in the categories above).” SBS, the Angelou Centre and S4S (2020)	

Table 9: Evidence cited by sector that is not referenced in HOR

5.14 Evidence presented by the ending VAWG sector that DACR researchers were unable to triangulate

Evidence (quote)	Evidence submission referenced in	Original source (if different from evidence submission)	Implications/relevance
1. “ReportRacismGRT.com is a third-party reporting and support site run by the NGO ‘Herts GATE’ for Gypsy, Roma and Traveller victims of hate crime and hate speech. It has the backing of	SUMW/LAWRS (2018). <i>Safe Reporting of Crime for Migrants with Insecure Immigration</i>	Not able to triangulate as organisational data (internal/sensitive) from ReportRacismGRT	Relevant as the ‘justice gap’ and concerns around information sharing by police contribute to unequal

Evidence (quote)	Evidence submission referenced in	Original source (if different from evidence submission)	Implications/relevance
<p>those three groups. Their data of 125 cases of hate incidents logged on the site over the last year, shows that 99 did not report the incident and only 26 did report to police. That's 75% did not report. The reasons for not reporting were given as:</p> <ul style="list-style-type: none"> - 34% I did not think the police or authorities would do anything - 27% The incident is too common an occurrence to report - 8.5% I would have felt ashamed, embarrassed or uncomfortable - 8% I did not know how to report - 6.8% I thought it would be too much trouble to report it" 	<p><i>Status: Roundtable Report)</i></p>		<p>outcomes for minoritised and migrant victims</p>
<p>2. "Notably, research has shown that the police made an arrest in fewer cases of migrant women, and it was much less likely to conduct a criminal investigation and bring a criminal charge in cases involving migrant women. Indeed, there is also considerable evidence to show that they are more likely to be reported to the Home Office rather than protected as victims of gender-based crimes (SBS, 2019). Migrant women were also less likely to get a civil injunction, or order, or to use the family courts (Bates <i>et al.</i>, 2018)"</p>	<p>Thiara, R. (2019). <i>Safe and Secure: The No Recourse Fund. Report of Findings</i></p>	<p>Claim is grounded in evidence presented by SBS (2019) and Bates <i>et al</i> (2018) which shows a 'justice gap' for migrant victims</p> <p>However, reviewers were unable to triangulate the claim that migrant victims were more likely to be reported to the HO than protected as victims of gendered violence. This seems to be an <i>interpretation or framing</i> of the evidence cited which is presented in hyperbolic/emotive language, not a straightforward citation</p> <p>Southall Black Sisters (2019). <i>#Protection for all: The Domestic Abuse Bill & Migrant Women. Briefing Paper</i></p> <p>and</p> <p>Bates, L., Gangoli, G., Hester, M. and Justice Project Team (2018). <i>Policy Evidence</i></p>	<p>Relevant as the 'justice gap' and concerns around information sharing by police contribute to unequal outcomes for some migrant victims</p>

Evidence (quote)	Evidence submission referenced in	Original source (if different from evidence submission)	Implications/relevance
		<i>Summary 1: Migrant Women</i> . University of Bristol, Bristol	
3. "There is also some evidence to suggest that migrant and BME women suffer from disproportionately higher rates of these types of deaths linked to a history of abuse (Mayor of London, 2010)"	Thiara, R. (2019). <i>Safe and Secure: The No Recourse Fund. Report of Findings</i>	<p>We were able to triangulate this claim to the Mayor of London 2010-13 ending VAWG strategy:</p> <p>"A disproportionate number of domestic homicides involve recent migrants as victims and/or perpetrators" (Mayor of London, 2010: 41)</p> <p>However, the source of this claim was not cited within the Mayor of London report, making attribution challenging</p> <p>The Mayor of London; <i>The Way Forward: Taking action to end violence against women and girls - Final Strategy 2010- 2013</i></p> <p>Available at: https://www.london.gov.uk/sites/default/files/the_way_forward_-_strategy.pdf</p>	If migrant women are disproportionately subject to domestic homicide, this may suggest that existing mechanisms/support channels are inadequate and that changes are needed to address disparate outcomes

Table 10: Evidence referenced by the ending VAWG sector that researchers were unable to triangulate

5.15 Critical Appraisal checklist – Women’s Aid (2018a)

Appropriate research design?	Representative setting & subjects?	Data collection methods	Data analysis	Positionality	Credibility	Justified conclusions?	Transferability	Trustworthiness, (Assessed) value	Use of evidence
Yes: commissioned in the context of proposed changes	Scoping review, interviews and data from	Data collected from DA services (28	Not described in detail	Clearly stated position and objectives for research: "Women’s	Highly credible: grounded in	Yes: recommendations are based on experiential	National data: should theoretically	Yes: Draws on multiple	Reference in HOR

<p>to funding, which would have removed/devolved one of the refuge sector's key funding streams (rent and related service charges, presently funded via housing benefit)</p> <p>Comprised scoping review, consultation with experts on supported housing, welfare benefits and universal credit – Jo Linney, Lorraine Regan and Domini Gunn, organisational data (collected from 28 member organisations delivering 60 refuge services), interviews with key stakeholders</p>	<p>member organisations – lack of methodological detail makes it difficult to gauge how representative, but information regarding funding streams is nationally applicable</p>	<p>organisations providing 60 refuge services) interviews with key stakeholders in government and other related fields and a literature review of last five years (at time undertaken)</p>	<p>(not uncommon for grey literature)</p>	<p>Aid has continued to advise, offer data, insight, and expertise to the government while it has been considering new funding proposals for short-term supported housing. This briefing details its latest contribution to this work and sets out a proposal designed by independent consultants for a secure, sustainable and workable model of funding for independent refuges”</p>	<p>consultation with reputable sources, scoping review and primary data from refuges, and findings are consistent with wider research evidence</p>	<p>evidence from key stakeholders, organisational data from member organisations including information on available bedspaces, victims turned away due to lack of space or unable to access refuge due to accessibility issues</p> <p>Recommendation to continue funding rent and related service charges for refuges via housing benefit (universal credit) – justified in relation to findings regarding the precarity of the sector and the benefits of having a sustainable funding stream (not tied to local commissioning)</p>	<p>be nationally applicable (although details of composition/distribution of stakeholders not provided)</p>	<p>forms of evidence, Consultation of reputable sources, building on previous research on funding models</p>	
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Table 11: Critical appraisal checklist – Women’s Aid (2018a)

5.16 Critical Appraisal checklist – Women’s Aid (2017)

Women’s Aid (2017). *Nowhere to Turn: Findings from the First Year of the No Woman Turned Away project*

Appropriate research design?	Representative setting and subjects?	Data collection methods	Data analysis	Positionality	Credibility	Justified conclusions?	Transferability	Trustworthiness, (Assessed) value	Use of evidence
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<p>Yes: Mixed methods. Reporting on NWTA project to support women and their children who are unable to access conventional refuge accommodation, or for whom it is not the right option. Report designed to provide detailed monitoring and analysis around demand and availability of bed spaces, mapping regional provision and areas of shortfall, barriers to access identified by survivors and understand women's pathways to support</p>	<p>Survey data based on responses from 19 survivors, and interview data from four, so difficult to gauge/establish representativeness of contextual evidence</p> <p>Organisational data gathered via Routes to Support, National Domestic Violence Helpline and journey tracker likely to be nationally representative</p>	<p>Incorporates literature review, annual survey data from member services, organisational data – helpline calls, vacancy monitoring collected via Routes to Support database (UK wide database of DA services and refuge vacancies) NWTA caseworker journey tracker, plus contextual evidence from survivors collected via semi structured-survey questionnaire (n = 19) and semi-structured interviews (n = 4)</p>	<p>Caseworker journey data collated with demographic information of survivor and exported to Excel spreadsheet for analysis</p> <p>Vacancy monitoring data exported to Excel spreadsheet</p> <p>Otherwise, limited details regarding analysis process (not uncommon in grey literature)</p>	<p>“Women’s Aid is the national charity working to end domestic abuse against women and children. Over the past 44 years, Women’s Aid has been at the forefront of shaping and coordinating responses to domestic violence and abuse through practice, research and policy. We empower survivors by keeping their voices at the heart of our work, working with and for women and children by listening to them and responding to their needs”</p>	<p>Highly credible: Findings are consistent with wider evidence base from academic research and practice-focused/grey literature regarding the barriers to accessing refuge and the precarity of funding, particularly for victims with NRPF (see Adisa et al, 2020)³⁰</p>	<p>Yes: claims are grounded in multiple forms of evidence, enabling for triangulation of survivor/practitioner/research perspectives</p>	<p>Based on national data, so applicable at a national level</p>	<p>Yes: Draws on multiple forms of evidence, including wider literature, methodologically transparent regarding data collection and limitations of data gathered</p>	<p>Referenced in HOR</p> <p>Referenced in:</p> <p>Women’s Aid (2020). <i>Protection for Migrant Women</i>. Evidence submission</p> <p>SUMW/LAWRS (2018). <i>Safe Reporting of Crime for Migrants with Insecure Immigration Status: Roundtable Report</i></p> <p>Thiara, R. (2019) <i>Safe and Secure: The No Recourse Fund. Report of Findings</i></p>
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Table 12: Critical appraisal checklist – Women’s Aid (2017)

³⁰ Adisa O., Allen K., Costello F., Meehan A. (2020). [A scoping review of refuge provision models](#). University of Suffolk

5.17 Critical Appraisal checklist – Women’s Aid (2018b)

Women’s Aid (2018). *Nowhere to Turn, 2018: Findings from the second year of the No Woman Turned Away project*

Appropriate research design?	Representative setting and subjects?	Data collection methods	Data analysis	Positionality	Credibility	Justified conclusions?	Transferability	Trustworthiness, (Assessed) value	Use of evidence
Yes: As above, mixed methods approach to identify and understand gaps and variation in provision, and barriers women experienced to accessing safety	National case management and outcome data representative of women supported via the project nationally Interview data from a small, purposive sample of women with intersecting needs	Incorporates case management and outcome monitoring data from On Track (Women’s Aid case management system) – including support needs, abuse experienced, demographic data, outcomes, barriers, and what happened while awaiting refuge/safe accommodation Experiential data from practitioners (case notes, capture forms regarding bad practice) Three interviews with caseworkers, three interviews with a purposive sample of survivors with intersecting support needs Semi-structured survey data from survivors (not	Limited information on analysis process – not uncommon in grey literature	“Women’s Aid is the national charity working to end domestic abuse against women and children. Over the past 44 years, Women’s Aid has been at the forefront of shaping and coordinating responses to domestic violence and abuse through practice, research and policy. We empower survivors by keeping their voices at the heart of our work, working with and for women and children by listening to them and responding to their needs”	Highly credible: Findings are consistent with wider evidence base from academic research and practice-focused/grey literature regarding the barriers to accessing refuge and the precarity of funding, particularly for victims with NRPF (see Adisa <i>et al</i> , 2020)	Yes: claims are grounded in multiple forms of evidence, enabling for triangulation of survivor/practitioner/research perspectives	Based on national data, so applicable at a national level	Yes: Draws on multiple forms of evidence, methodologically transparent regarding data collection and limitations of data gathered	Referenced in HO review Referenced in: Women’s Aid (2020). <i>Protection for Migrant Women</i> . Evidence submission SUMW/LAWRS (2018). <i>Safe Reporting of Crime for Migrants with Insecure Immigration Status: Roundtable Report</i> SUMW (2020). <i>Review into Support Levels for Migrant Victims of Domestic Abuse</i> <i>Evidence from the Step Up Migrant Women Coalition.</i>

		<p>included in this part of the report)</p> <p>Case study of local authority responses to domestic abuse in East London (captured via an anonymous survey circulated to professionals at a Women's Aid event)</p>							<p>Evidence submission</p> <p>Thiara, R. (2019). <i>Safe and Secure: The No Recourse Fund. Report of Findings</i></p> <p>Post-review references:</p> <p>SBS and LAWRS (2020). <i>Migrant Victims of Domestic Abuse Review Findings: A response by Southall Black Sisters and Latin American Women's Rights Service</i></p>
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Table 13: Critical appraisal checklist –Women’s Aid (2018b)

5.18 Critical Appraisal Checklist – Women’s Aid (2019)

Women’s Aid (2019) *Nowhere to Turn: Findings from the third year of the No Woman Turned Away project*

Appropriate research design?	Representative setting & subjects?	Data collection methods	Data analysis	Positionality	Credibility	Justified conclusions?	Transferability	Trustworthiness, (Assessed) value	Use of evidence
Yes: As above, mixed methods approach to identify and understand gaps and variation in provision, and barriers women experienced to accessing safety.	National case management and outcome data representative of women supported via the project nationally	Incorporates case management and outcome monitoring data from On Track (Women’s Aid case management system) Contextual evidence/participatory methods: Semi-structured interviews with 17 survivors Artwork (drawings, poems, photographs and collages) by survivors supported through the project	Limited information – not uncommon in grey literature One survivor supports the analysis of artwork (referenced in acknowledgements)	“Women’s Aid is the national charity working to end domestic abuse against women and children. Over the past 44 years, Women’s Aid has been at the forefront of shaping and coordinating responses to domestic violence and abuse through practice, research and policy. We empower survivors by keeping their voices at the heart of our work, working with and for women and children by listening to them and responding to their needs”	Highly credible: Findings are consistent with wider evidence base from academic research and practice-focused/grey literature regarding the barriers to accessing refuge and the precarity of funding, particularly for victims with NRPF (see Adisa <i>et al</i> , 2020)	Yes: claims are grounded in multiple forms of evidence, enabling for triangulation of survivor/practitioner/research perspectives	Based on national data, so applicable at a national level	Yes: Draws on multiple forms of evidence, methodologically transparent regarding data collection and limitations of data gathered	Reference in HOR Referenced in: Women’s Aid (2020). <i>Protection for Migrant Women</i> . Evidence submission

Table 14: Critical appraisal checklist – Women’s Aid (2019)