

Written evidence submitted by Women for Refugee Women (NBB12)

Evidence to the Nationality and Borders Public Bill Committee

About Women for Refugee Women:

Women for Refugee Women (WRW) works with women seeking asylum, to challenge the injustices of the UK's asylum system. We are based in London, and also work with partners across England and Wales who support and campaign with women seeking asylum.

Introduction to submission:

- At WRW we are deeply concerned about the particular harm that the Nationality and Borders Bill will have on women seeking asylum because of their specific vulnerabilities and their particular experiences of violence.
- WRW's research has documented how many women seeking asylum in the UK **have fled gender-based violence in their countries of origin** – including rape, domestic violence, forced marriage, forced sexual exploitation, and FGM.
- Our 2020 report *Will I Ever Be Safe?*, which interviewed 106 asylum-seeking and refugee women forced into destitution in the UK, found that **78% of these women had experienced gender-based violence in their countries of origin**.¹ Our 2017 report *We Are Still Here*, which interviewed 26 asylum-seeking women who had been held in immigration detention, found that **85% of the women we spoke to were survivors of gender-based violence**.²
- Many women are abused again on their journeys to safety. *Will I Ever Be Safe?* found that **45% of the women interviewed had experienced rape, sexual violence, torture, physical violence and/or imprisonment during their journey to the UK**.
- Women already struggle to get protection from the UK's asylum system. Women and men who seek asylum face a culture of disbelief at the Home Office, whose unfair and irrational decision-making is well documented. But women are disadvantaged further because of the inadequate understanding among some Home Office decision-makers of gender-based violence. In addition, women who have experienced sexual violence or exploitation often face severe challenges in disclosing their stories.
- Once they are wrongly refused asylum they are generally forced into destitution, which has devastating impacts on their safety. *Will I Ever Be Safe?* found that a third of women who had been raped or sexually abused in their country of origin were then raped again or subjected to further sexual violence in the UK after becoming destitute. Women who are refused protection also become liable to immigration detention. Being locked up in detention is highly traumatising for already vulnerable women.
- **The Nationality and Borders Bill will make it even harder for women to be recognised as refugees and live in safety in the UK.** We believe that a number of the proposed measures will have a **disproportionate impact on women**, as a result of the particular nature of their asylum claims. In the sections below, we explain how the Bill will do this.
- To date there has not been a genuine attempt by the government to listen to women who have been forced to cross borders for safety. The consultation on the *New Plan for Immigration*, a 52-

¹ Women for Refugee Women (2020) *Will I Ever Be Safe?*; <https://www.refugeewomen.co.uk/wp-content/uploads/2020/02/WRW-Will-I-ever-be-safe-web.pdf>

² Women for Refugee Women (2017) *We Are Still Here*; <https://www.refugeewomen.co.uk/wp-content/uploads/2019/01/women-for-refugee-women-reports-we-are-still-here.pdf>

page document, was open for only six weeks, and the format of that process made it impossible for many women in our networks to respond.

- In its *Tackling Violence Against Women and Girls Strategy*, published shortly after the Nationality and Borders Bill was introduced to Parliament, the government recognised the ‘devastating impact’ of gender-based violence on women and insisted: ‘We want to ensure that victims and survivors can be confident they will get the support they deserve’.³ At the same time, the government has committed to a foreign policy that ‘consciously and consistently delivers gender equality’.⁴
- Yet, the provisions in the Nationality and Borders Bill undermine such claims. Rather than providing asylum-seeking women who have fled gender-based violence with safety and support, **the Bill will actively harm and retraumatise them.**

Detailed consideration of Bill provisions:

In the sections that follow we consider in detail the clauses in the Nationality and Borders Bill that we are concerned will have a significant – and in some instances disproportionate – impact on women.

Part 2: Asylum

1. A two-tier system

- a. Clause 10 distinguishes between ‘Group 1’ and ‘Group 2’ refugees, depending on how they travelled to the UK and whether they have claimed asylum immediately after arrival. If a woman has arrived through a safe third country or has not presented herself to the authorities ‘without delay’, and is subsequently recognised in the UK as a refugee, she would fall under ‘Group 2’. As a ‘Group 2’ refugee she would have no automatic path to settlement, even if she has proved a well-founded fear of persecution. She would have restricted rights to family reunion and limited access to public funds. As ‘Sara’, one woman in our network said, ‘they might as well be ending the asylum system completely.’
- b. **We wholly object to the two tier-system that would harm some of the most desperate women in need of refuge.** Women are often compelled to take irregular routes to reach safety. Even if new safe routes were created by the government, they would simply not be available to all those in need of protection. Many women would not be able to safely reach an embassy or cross a border to access a resettlement programme, if those routes did indeed exist. Others would only be able to disclose their need for protection once they reach a country they consider safe. Yet under the proposed changes women who arrive irregularly, including through a safe third country, would be treated less favourably. Further, she could be prosecuted and imprisoned for one to four years.⁵
- c. As well as punishing people based on their mode of arrival, the two-tier system penalises those who are unable to claim asylum soon after arriving in the UK. Yet there are many reasons for why women may not be able to do this. LGBT+ women, who are forced to live their lives in

³ HM Government (2021) *Tackling Violence Against Women and Girls Strategy*;

<https://www.gov.uk/government/publications/tackling-violence-against-women-and-girls-strategy>

⁴ HM Government (2018) *UK National Action Plan on Women, Peace & Security 2018-2022*;

<https://www.gov.uk/government/publications/uk-national-action-plan-on-women-peace-and-security-2018-to-2022>

⁵ Part 3, Clause 37

hiding, are often unaware that they are refugees when they arrive, only realising that they can seek asylum much later. Some women from our network escaped danger by arriving in the UK on a visa, as this was the only legal route open to them; they hoped that their stay would be temporary, but later discovered that their lives were still at risk and that they should claim protection in the UK. Many women who have survived sexual and gender-based violence are heavily traumatised, and need time to heal and feel safe before they can share their stories of persecution with government officials. The severe difficulties in disclosure that women may experience are acknowledged in Home Office policy, so it is unclear why the department is actively going against this in the Bill.⁶

- d. Applicants for asylum are already required to claim asylum as soon as possible after entering the UK, and if they fail to do so the Asylum and Immigration (Treatment of Claimants) Act 2004 instructs judges to treat this as potentially damaging to their credibility.⁷ At the same time, the Home Office has the power to certify a claim as ‘clearly unfounded’ where it decides that there is no prospect of it succeeding. In light of these existing powers, it is unclear why the government is going even further by designating certain people who make late claims as ‘Group 2’ refugees.
- e. Clause 10(5) gives the Home Secretary broad discretion to set the length of any limited period of leave given to ‘Group 2’ refugees, such that they may be indefinitely liable for removal. Indeed, both the New Plan for Immigration as well as the explanatory notes on the Bill confirm that ‘Group 2’ refugees, who have a well-founded fear of persecution, will only be given temporary protection status - no more than 30 months according to the New Plan - after which they will be reassessed for return or removal.⁸ The uncertainty and the inability to move forward with their lives would retraumatise women who have been subjected to the most horrific abuse.
- f. The absence of gender in the UN Refugee Convention makes the assessment of many women’s cases complex, and particularly when they involve persecution by private individuals as opposed to the state. Home Office guidance reminds us that ‘[v]iolence against women can occur more commonly within the family or community.’⁹ Yet, decision-makers have often shown a poor understanding of how private violence falls within the UN Refugee Convention, and the UK’s obligation to grant asylum. Having to periodically demonstrate the need for safety is likely to be harmful for all women who have survived gender-based abuse, and especially for those who have fled private violence.

2. Accommodation centres

- a. Clause 11 provides for the introduction of large-scale asylum accommodation centres, where people seeking asylum will be housed while their claim is processed. Under Subsection (8), the maximum time that asylum claimants can be housed in an accommodation centre, six months, is removed. **This means that people seeking asylum could remain in accommodation centres for**

⁶ Home Office (2018) *Gender Issues in the Asylum Claim*; https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/699703/gender-issues-in-the-asylum-claim-v3.pdf

⁷ s.8.

⁸ *New Plan for Immigration*, Chapter 4: Disrupting Criminal Networks and Reforming the Asylum System; & *Nationality and Borders Bill: Explanatory Notes*.

⁹ Home Office (2018) *Gender Issues in the Asylum Claim*.

the entire time their claim is being considered – which can be many months, and even years.

- b. Since April 2020 the Home Office has been using two large-scale accommodation centres for asylum-seeking men who have arrived in the UK by boat: Napier Barracks in Kent, and Penally Camp in Wales. A recent short report by the APPG on Immigration Detention, which is conducting an inquiry into these sites, notes that – although, legally-speaking, they are not detention centres – they nonetheless ‘replicat[e] many of the features found in detained settings, including visible security measures, shared living quarters, reduced levels of privacy, and isolation from the wider community’.¹⁰
- c. Residents of Napier and Penally who have given evidence to the APPG have described these sites as feeling ‘prison-like’. This has a retraumatising effect on people who are already vulnerable, as a result of the previous experiences that have forced them to seek protection. We are therefore very concerned about the potential use of such accommodation centres for asylum-seeking women, many of whom, as we have highlighted, are survivors of rape and other forms of gendered violence.
- d. We are also concerned by the lack of privacy that characterises such sites. The APPG notes that in Napier and Penally, ‘the lack of private space was forcing residents to hold sensitive discussions, for example with lawyers, within earshot of other residents and/or staff’. For many asylum-seeking women who have experienced rape and other gender-based violence, disclosure of their previous experiences can be very difficult, as a result of the shame and stigma they feel. Thus, accommodation centres’ lack of privacy is likely to have a specific impact on them, and make it particularly difficult for them to get their claims for protection recognised.

3. Restrictions in bringing evidence

- a. Clause 16 permits the Home Secretary to serve an evidence notice on a person who has made a protection/human rights claim, forcing them to raise all the reasons for why they need protection. Clause 17 specifies that if the person fails to provide evidence within a specified period their credibility could be damaged. Further, under Clause 23, decision-makers are instructed to give regard to the principle that ‘minimal weight’ be given to later evidence ‘unless there are good reasons’, which is undefined in the Bill and therefore left entirely to the discretion of the Home Secretary.
- b. Yet there are many good reasons why women who have fled sexual and gender-based violence cannot share relevant experiences right away. As we have highlighted above, this is acknowledged in Home Office guidance which refers to ‘guilt, shame, concerns about family “honour” or fear of family members.’¹¹ The same guidance acknowledges that women who have been trafficked to the UK may be facing threats from their traffickers at the time of their interview, such that they are unable to speak openly. Some women, who have fled persecution because of their sexual orientation, are not able to disclose their sexuality during the time of their initial claim; they may still be coming to terms with it themselves, a process which can take years. Thus, here too the Bill goes directly against Home Office policy which states that late disclosure should not automatically prejudice a woman’s credibility.¹² The backlog of asylum

¹⁰ APPG on Immigration Detention (2021) *Inquiry into Quasi-detention: Interim Report*; <https://appgdetention.org.uk/wp-content/uploads/2021/09/210907-APPG-Inquiry-Interim-report-Summary-of-oral-evidence-sessions.pdf?x87756>

¹¹ Home Office (2018) *Gender Issues in the Asylum Claim*.

¹² Home Office (2018) *Gender Issues in the Asylum Claim*.

cases urgently needs addressing, but restricting the ability of vulnerable women to bring evidence is neither a fair nor effective solution.

- c. There is already a very similar power in place, to serve an evidence notice, under s.120 of the Nationality, Immigration & Asylum Act 2002. A person who is served with a s.120 notice is under an ongoing duty to keep the Home Office informed of any change of circumstances. If the person then raises an issue after their appeal has been determined, the Home Secretary can prevent them from accessing the appeals process again under s.96 of the same Act. Thus, it is unclear why the government is introducing another evidence notice, and harming the prospects of vulnerable people to successfully claim asylum, when there are already powers in place that can address situations where applicants are acting in bad faith. The government has not presented any clear evidence to suggest why these new powers are needed, which will only strengthen the existing culture of disbelief, rather than dismantle it.
- d. **Women already face significant barriers to the full investigation and recognition of their protection claims. The clauses on late evidence will worsen those obstacles.** As well as causing harm to women in desperate need of safety, they will lead to greater unfairness in the system, an increasing number of incorrect decisions and ultimately therefore an increase in the backlog of cases.

4. Accelerated appeals procedure for people in detention

- a. Clause 24 reintroduces an accelerated appeals procedure for people whose cases, including asylum claims, are being processed while they are in detention. Under this clause, cases will be subject to the accelerated procedure if it is considered that 'any appeal ... would likely be disposed of expeditiously'. People subject to the accelerated procedure will have just **five days to lodge an appeal** against a negative decision on their case.
- b. The previous accelerated appeals procedure for detained asylum claimants operated as part of the Detained Fast Track (DFT). Like the new appeals procedure provided for by Clause 24, the DFT was also supposed to deal with 'straightforward' cases which could be processed quickly. However, **the DFT was abolished in 2015, following a series of legal challenges and a Court of Appeal finding that it was 'structurally unfair and unjust'**. The central problems with the DFT were: a) complex cases, including those involving women who had experienced rape and trafficking, were routinely being routed into it, because of inadequate screening; and b) the accelerated timescale for lodging an appeal made it almost impossible for these vulnerable individuals to meaningfully challenge a refusal of their asylum claim.¹³
- c. Even though the DFT has not operated since 2015, the **Home Office continues to detain women with active asylum claims, under Detained Asylum Casework (DAC)**. DAC is used for, amongst others, people who have claimed asylum *after* they have been detained. Many women do not claim asylum until this point because of the difficulties with disclosing their experiences of gendered violence, which we have highlighted above. It can also be because they simply do not realise that such experiences may form the grounds for a protection claim. WRW has worked with many women whose asylum claims have been processed under DAC, who are survivors of rape and other forms of gendered violence, including sexual exploitation.

¹³ Detention Action (2016) *The Fast Track is Dead*; <https://detentionaction.org.uk/2016/05/24/the-fast-track-is-dead/>

- d. Given the DFT's failure to identify 'straightforward' cases and ensure it was not dealing with complex claims by vulnerable individuals, **we have no confidence that only those cases that really can be dealt with swiftly will be subject to the accelerated appeals procedure set out by Clause 24.** Indeed, a number of recent reports on detention – including Stephen Shaw's 2018 review,¹⁴ and the Home Affairs Committee's 2019 report¹⁵ – testify to the Home Office's ongoing inability to develop and implement adequate screening mechanisms. A number of women we have supported whose cases were processed under DAC have now been granted leave to remain, including refugee status. Had they been subject to an accelerated appeals procedure, it is more likely they would have been wrongfully deported.

5. Offshore processing and detention of people seeking asylum

- a. Clause 26 introduces Schedule 3, which allows the government to remove people seeking asylum to countries outside the UK, and hold them in detention there, while their asylum claims are processed.
- b. If implemented, women who have survived rape, sexual exploitation and other forms of gendered violence will be subject to these measures. **This is because the key objective of 'offshore' detention is supposed to be deterrence.** There can be no exceptions to this policy, otherwise the objective of deterrence is undermined. Thus, when offshore detention was reintroduced by the Australian government in 2012, all people seeking asylum who arrived by boat were liable for removal to Nauru or Manus Island, 'even if they ... had characteristics warranting special consideration, such as being an unaccompanied minor, a survivor of torture and trauma, or a victim of trafficking'.¹⁶ As such, **by introducing such a provision the UK government must be willing to subject children, pregnant women, survivors of trafficking and other vulnerable people to offshore detention.**
- c. It is important to highlight, however, that even though deterrence is the formal objective of offshore detention, there is no empirical evidence to support its effectiveness as a deterrent strategy. A recent report by The Kaldor Centre for International Refugee Law highlights that in the year following the Australian government's reintroduction of offshore detention, 'more than 24,000 asylum seekers arrived in Australia by boat. This number was considerably more than at any other time since the 1970s, when boats of asylum seekers were first recorded in Australia. Moreover, as the months passed, and news of the policy presumably reached some of those who were contemplating travelling by sea to Australia, there was no noticeable change in the rate of arrivals, with boats of varying numbers of people (from two to more than 200) continuing to arrive on average several times per week.'¹⁷

¹⁴ Shaw, S. (2018) *Assessment of Government Progress in Implementing the Report on the Welfare in Detention of Vulnerable Persons*; <https://www.gov.uk/government/publications/welfare-in-detention-of-vulnerable-persons-review-progress-report>

¹⁵ Home Affairs Committee (2019) *Immigration Detention*; <https://publications.parliament.uk/pa/cm201719/cmselect/cmhaff/913/913.pdf>

¹⁶ Kaldor Centre for International Refugee Law (2021) *Offshore Processing: An Overview*; https://www.kaldorcentre.unsw.edu.au/sites/kaldorcentre.unsw.edu.au/files/factsheet_offshore_processing_overview.pdf

¹⁷ Kaldor Centre for International Refugee Law (2021) *Cruel, Costly and Ineffective: The Failure of Offshore Processing in Australia*; https://www.kaldorcentre.unsw.edu.au/sites/kaldorcentre.unsw.edu.au/files/Policy_Brief_11_Offshore_Processing.pdf

- d. Policy measures that rely on deterrence assume that people have a choice in the decisions they make. **People who are forced to flee their countries because of violence and persecution have no such choice.** Therefore, deterrent measures will not stop them from making journeys to find safety.
- e. As well as being ineffective, offshore detention is harmful. **We are extremely concerned about the conditions in which women would be held, and in particular the risk to them of sexual violence and abuse.** In detention centres in the UK, where there are a range of safeguarding mechanisms in place, this has not been enough to protect people in detention from abuse. The 2015 Lampard Report on Yarl's Wood – which up until last year was the main detention centre for women in the UK – highlighted that between 2007-15, 10 members of staff were dismissed for incidents involving 'sexual impropriety' towards women held there. Such 'impropriety' included the repeated sexual harassment and abuse of 29-year-old woman by a male healthcare worker.¹⁸
- f. The UK government will have even less control over the treatment of detainees in offshore detention centres. **Thus, the risk to women of sexual violence and abuse in such centres will be increased.** The sexual harassment and violence that women detained offshore by the Australian government were subjected to has been well documented.¹⁹

6. Proving a well-founded fear of persecution

- a. Clause 29 introduces a two-part test for determining whether an individual has a well-founded fear of persecution and should therefore be granted refugee status. This new test requires that past facts are established on a 'balance of probabilities' - the same standard applied in civil claims - whereas the question of whether there is a future risk to the applicant will be assessed against a different standard of 'reasonable likelihood'.
- b. By introducing a dual standard of proof, Clause 29 reverses 20 years of UK jurisprudence and goes against UNHCR standards which make clear that 'refugee claims are unlike criminal cases or civil claims'.²⁰ According to UNHCR guidance, a decision-maker should consider the applicant's fear well-founded if there is a reasonable possibility that they would face harm if returned to their country of origin. It goes on to state that jurisprudence developed in common law countries on what standard of proof is to be applied in asylum claims 'supports the view that there is no requirement to prove...that persecution is more probable than not'.²¹ In other words, the case law from other countries shows that the standard applied in refugee status determination is lower than the civil standard of 'balance of probabilities'.
- c. The new test, with its heightened standard of proof, is likely to have a disproportionate impact on asylum-seeking women who have fled sexual and gender-based violence, or persecution based on their sexual or gender identity. Many women who have fled sexual and gender-based violence suffer from post-traumatic stress disorder and depression, which can have a significant

¹⁸ Lampard, K. (2016) *Independent Investigation into Concerns about Yarl's Wood Immigration Removal Centre*; <https://www.verita.net/wp-content/uploads/2016/04/Independent-investigation-into-concerns-about-Yarls-Wood-immigration-removal-centre-Serco-plc-Kate-Lampard-Ed-Marsden-January-2016-1.pdf>

¹⁹ See, for instance, Refugee Council of Australia (2020) *Australia's Man-made Crisis on Nauru*; <https://www.refugeecouncil.org.au/nauru-report/>

²⁰ UNHCR (1998) *Note on Burden and Standard of Proof in Refugee Claims*; <https://www.refworld.org/docid/3ae6b3338.html>

²¹ UNHCR (1998) *Note on Burden and Standard of Proof in Refugee Claims*.

impact on memory and their ability to share a full and consistent story. It should be noted that women already struggle to evidence their asylum cases in the current system - rape or other forms of sexual assault or sexual exploitation are often more difficult to prove because unlike other forms of torture they do not always leave physical scarring. Further, gender-based violence, especially abuse in the private sphere (such as the community) is not as well documented by human rights organisations and others, making the assessment of whether there is a future risk of persecution even more challenging for women. Coupled with the inadequate understanding that is often shown by decision-makers of the effects of sexual and gender-based violence, women end up facing multiple barriers to getting a fair assessment of their claims.

- d. Additionally, Clause 30 introduces a restricted definition of 'particular social group', a ground in the Refugee Convention that women escaping gender-based violence frequently depend on to obtain refugee status. Again, the definition reverses UK jurisprudence, by providing that two criteria must be met in order for an applicant to show that they are a member of 'particular social group', not one as is currently the case. Since this ground is often used by survivors of gender-based violence, especially those who have fled private violence, women will be significantly and disproportionately impacted by this change, needing to overcome an additional hurdle in order to obtain refugee status.
- e. **This change was not heralded in the consultation and is an unexplained regressive step that, coupled with the change in the well-founded fear test, will result in more women being wrongly refused asylum.**

Part 4: Modern Slavery

7. Slavery or trafficking information notices

- a. Under the National Referral Mechanism (NRM) the identification of trafficking victims is a two-stage process, the first part being the 'reasonable grounds' test, which acts as an initial filter, before a 'conclusive grounds' decision is taken.
- b. Clause 46 specifies that asylum claimants who are served with a 'slavery or trafficking information notice' will be required to provide relevant information relating to being a victim of slavery or human trafficking within a specified period. Clause 47 provides that if they give this information after the specified period, 'without good reason', this will damage their credibility in relation to a reasonable grounds or conclusive grounds decision from the NRM.
- c. Yet it can take many months, sometimes years, for a woman who has been forced into sexual or other exploitation to speak about the abuse she has suffered. Indeed, the Home Office's own guidance²² clearly states that trafficking victims may take a long time to disclose what has happened to them because of the trauma to which they have been subjected. Many women who have been trafficked also find disclosure difficult because of fear of reprisals from their traffickers, as well as the shame and stigma they feel. **Thus, clauses 46 and 47 will mean that fewer women are recognised as victims of trafficking, and so will not receive the protection and support that they need.**

²² Home Office (2021) *Modern Slavery: Statutory Guidance for England and Wales*; https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/993172/Modern_Slavery_Statutory_Guidance_EW_Non-Statutory_Guidance_SNI_v2.3.pdf

8. Raised threshold for 'reasonable grounds' decision

- a. Clause 48 raises the threshold for being recognised as potential victim of trafficking (PVOT), through a 'reasonable grounds' decision from the NRM. A positive decision will now be made when there are reasonable grounds to believe the individual 'is' – rather than 'may be' – a victim of slavery or human trafficking.
- b. In the *New Plan for Immigration*, the government stated that raising the threshold for a reasonable grounds decision is necessary to prevent 'abuse' of the NRM, which apparently is often carried out by people who are attempting to 'frustrate' their removal from the UK. Yet there is no evidence of such abuse.
- c. Indeed, statistics recently published by the Home Office show that in 2017, almost 60% of people leaving detention who were referred into the NRM **were recognised by the Home Office as a PVOT through a positive reasonable grounds decision.**²³ Recent research has also shown that in 2020, 81% of challenges to negative reasonable grounds decisions by the Home Office were successful. Such evidence indicates that rather than 'abuse' of the system being a problem, the Home Office is actually making the wrong decision in a significant number of cases.²⁴
- d. Thus, it is already difficult for survivors of trafficking to be properly identified by the Home Office and to receive the support they need. **Raising the threshold for a reasonable grounds decision will make this problem even worse.**

9. Disqualification from protection

- a. Clause 51 disqualifies women from trafficking protections if they are a 'threat to public order', defined broadly to include those who are sentenced to a period of imprisonment of 12 months or more.
- b. WRW are aware of women who have experienced sexual and other forms of labour exploitation, who have been wrongfully prosecuted and imprisoned for criminal offences related to their exploitation, and who need protection. It is wholly unfair to punish victims for the crimes they were forced to commit.

Conclusion

We urge the government to abandon the above proposals and instead:

- 1) Increase safe and legal routes to the UK for people seeking asylum;
- 2) Ensure the asylum system has a culture of protection at its core rather than one of disbelief;
- 3) Ensure quality legal representation at all stages of the asylum process;
- 4) Ensure specialist mental health support;
- 5) End the policy of enforced destitution;

²³ Home Office (2021) *Issues Raised by People Facing Return in Immigration Detention*; <https://www.gov.uk/government/publications/issues-raised-by-people-facing-return-in-immigration-detention/issues-raised-by-people-facing-return-in-immigration-detention>

²⁴ After Exploitation (2021) *Majority of Trafficking Claims Found to be 'Positive' After Reconsideration*; <https://afterexploitation.com/2021/07/02/new-data-majority-of-trafficking-claims-later-found-to-be-positive-after-reconsideration/>

6) End the detention of women.

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