SUBMISSION TO THE PARLIAMENTARY COMMITTEE ON THE IMMIGRATION AND ASYLUM BILL

Dear Committee Members,

Introduction

We are writing jointly from the All African Women's Group (AAWG) and Women Against Rape (WAR) to express our horror at the changes in the Immigration and Asylum Bill. We focus here on the impact on women and children and ask you to oppose this bill.

We are asylum-seeking and refugee women, most of us are mothers and carers. We have already survived war, persecution, the effects of climate breakdown, rape and other sexual violence, separation from our precious children and profound loss, including of loved ones. We suffer constant fear, destitution and the threat of detention and deportation.

We were shocked to read the Impact Assessment for this Bill, which shows how little detail has been worked out and how much is being left outside parliamentary scrutiny.

We **wrote** (*14 July 2026*) to urge women MPs to speak out against this bill and campaign to stop these and other related policies. This is an important moment for all MPs to stand with women seeking safety and oppose measures that will make our lives and the lives of our children even more precarious and dangerous.

1. Rape and trafficking survivors cannot get a fair hearing

The new Immigration and Asylum Bill penalises women for delays in reporting rape, trafficking and other violence. "Late claims" may be fast-tracked and receive less scrutiny, while appeal rights will be limited to a single hearing on a tight timescale.

The Home Office's own guidance recognises that trauma can cause delayed disclosure, fragmented memory and inconsistencies. Survivors of rape and trafficking are often treated as liars by the Home Office and the Tribunal, despite the well-documented difficulties victims have in disclosing traumatic experiences. Not being believed about rape causes immense distress, the impact of which is ignored.

In WAR's decades of experience, many women need help to report their experiences of rape and other sexual violence due to the shame and stigma they face. That do not receive this help within the asylum system, especially when it's so difficult to find a legal aid lawyer with the time and expertise to represent them properly. Also, many women do not know that rape and domestic violence are grounds to claim asylum; they do not know that rape in marriage is a crime; they do not recognise that their experiences amount to "trafficking" when the arrangements were made by a husband or so-called "boyfriend". All of these factors cause delay in reporting and any system that punishes victims for delay is knowingly sexist and hostile.

These changes will lead to more women being wrongly refused asylum and sent back to countries where we face persecution, violence and even death.

2. Removing independent judges and restricting appeals

The Bill proposes to replace independent immigration judges with a new appeals body that is closely tied to the Home Office. Appeals are often the first time that women seeking asylum have the chance of a fair hearing before legally qualified judges, with some semblance of accountability.

The Government argues that non-legally qualified adjudicators make decisions in other areas. But these are not decisions about life and death. The previous system of non-legally qualified adjudicators was scrapped by the last Labour government in 1999 because appeal decisions were found to be of poor quality.[i]

The proposals for protecting accountability within the new body are not yet written, and there are no safeguards in the Bill. We submitted evidence to the consultation on changes to the appeals system, but the concerns raised have been ignored in the Bill.[ii]

These new procedures are even more unfair when Home Office Country Policy Information Notes ("CPIN") which are used to decide women's claims are inaccurate and sexist. See our open letter about the dangers women face in Namibia that are systematically ignored by the Home Office when deciding asylum claims.[iii]

3. Lack of legal aid

Most of us cannot find lawyers to represent us in a complex and hostile system. There are no proposals to ensure that asylum seekers have access to legal aid lawyers. One of our members described the problems caused by the lack of legal aid like this:

> *"To be able to have a fair hearing, we need legal aid to support our cases and a safe space to speak about what we have suffered. Knowing that we are being listened to helps us gain confidence and self-esteem.*
>
> *Without legal aid, we miss crucial information and evidence, including country expert and psychological reports, which are essential to building strong cases. Without these, our cases are weak and lack the information we need to win. It is like going to farm without the necessary tools to work."*

From WAR's decades of experience working with asylum seekers who have suffered rape, we know that without sufficient legal aid, there can be no fair appeal system for victims.

4. Making refugees pay for asylum support and settlement is sexist

The Bill allows the Home Office to force refugees and those refused asylum to pay for the costs of their asylum support and accommodation. The limit is not set within the Bill although the Home Office has given a figure of £10,000. Although the Bill does not say that

this money must be repaid before settlement is granted, it is highly likely to form part of the "*earned settlement*" proposals. (We consider that the committee must ensure a full explanation about this is available to them when considering these provisions).

This is extortion from people who were left destitute and housed in slum conditions in hotels or camps while private companies made massive profits.[iv]

These proposals discriminate against women. Women, particularly women of colour and migrant women, are paid far less than men because of entrenched sexism and racism in the labour market. Single mothers are more likely to live in poverty.[v] Many refugee women are also survivors of rape, trafficking and other violence and need time to recover before we can enter employment.

Women everywhere are primary carers for children, elderly and disabled family members, as well as sustaining our communities. Yet this essential, unwaged work is treated as if it has no value.

Government research found that refugees are 22% less likely to be employed than people born in the UK and have a 55% lower weekly salary.[vi] Policies that tie settlement to payments and earnings therefore institutionalise discrimination. The longer it takes women to obtain settlement, the more they have to pay in Home Office fees.

The impact assessment to this Bill states that no one will be pushed into destitution, but it also acknowledges that money can be recouped through the Universal Credit system. There is clearly no guarantee that people will not be pushed into destitution.

5. Family separation and the impact on children

The restrictions on Article 8 rights, including the rules about parents remaining in the UK because of their relationship with a "qualifying child", are designed to affect people with and without criminal convictions. While the Government's rhetoric focuses on people convicted of serious crimes, their figures (in the Bill's impact assessment) show that 92% of those affected have no convictions, and women make up 45% of the total. There will still be no legal aid to enable parents to prepare the complex evidence that will be required to establish an Article 8 right under the new test. This is grossly unfair, particularly for mothers who are less likely to earn enough to pay for a private lawyer.

The policy is justified partly by the cost of benefits, but this ignores that those most likely to receive benefits are mothers and people with disabilities or serious illnesses. One of our members described the impact like this:

> "*This law is unfair and very harsh for mothers and children. It is not going to repair what has already been damaged for women and children; it is only going to cause more damage and fear.*
>
> *If mothers can never settle, this will have a great effect on their children too. It will cause more panic, anxiety and depression, and fear of what tomorrow will bring. Women will live in fear of being separated from their children, taking away what gives them joy, parts of their body away from them*."

A child who has lived here for seven years has settled, made friends and may know no other country as home. Taking them away will damage them emotionally and affect their development. Moving to a country they do not know can cause anxiety, isolation, depression and difficulties at school and in making friends.

Separating a child from one parent and leaving them with the other is also unfair. There may be domestic violence, putting the child at risk. Children should not have to suffer the grief of losing a parent through deportation. They may feel abandoned, confused and angry, and this can have long-term effects on their emotional wellbeing and relationship with their parents.

The system should promote unity, not separation. The bond between mother and child should be respected and supported, and they should feel safe. When the system persecutes women, children suffer the most.

6. The terror of the racist far right

It is distressing to see this Labour government pandering to extreme racist and sexist hatred. Some of us have been trapped in hotels with violent racists demonstrating outside. We gave evidence to Parliament about this.[vii] We face more overt racism now and are fearful for ourselves and our children. We know first-hand the terror caused by the rise of the far right and the importance of politicians and others in authority standing up to it.

Home Office research acknowledges that unmet needs and vulnerabilities, including long waiting times and restrictions on employment, hinder integration and increase public costs in health, education and other areas. Making the asylum process more discriminatory and hostile will only make this worse.

More refugees are being forced to seek safety in the UK because of war and genocide. Palestinians are the single largest and longest-standing refugee population globally, having suffered decades of occupation, terror and now genocide. Is it right that people suffering like this are turned away from the UK and denied protection and safety through hostile asylum systems?

What we ask you to do

Please scrutinise this Bill and support amendments that prevent this attack on women's and children's lives.

Our demands

- Defend the right to family reunion so mothers can live with their children in safety.
- End policies that deepen poverty and increase detention and family separation.
- Oppose income-based barriers to permanent status, including Home Office fees.
- Oppose Home Office restrictions on refugee status and citizenship.

- Defend appeal rights and oppose the removal of legally trained judges from an independent Tribunal.
- Reinstate adequate legal aid so asylum seekers can obtain proper representation.

Please tell us urgently what you can do to oppose these proposals and demand parliamentary scrutiny where the Government is planning to push through changes without even a vote.

Trinity, All African Women's Group (AAWG)

Cristel, Women Against Rape (WAR)

References

1. Home Office guidance on conducting asylum interviews
2. Home Office guidance on considering asylum claims and assessing credibility

[i] https://www.barcouncil.org.uk/static/4ff06bc3-5508-4bd2-aab256712f49fa28/Bar-Council-Second-Reading-Briefing-Immigration-and-Asylum-Bill-Jul-26.pdf

[ii] AAWG and WAR submission on proposed changes to the immigration appeals system

[iii] AAWG open letter on the Namibia country of origin report

[iv] Clearsprings Ready Homes, a company providing accommodation to asylum seekers has made nearly £187m in profits since being awarded lucrative government contracts, despite allegations of "terrible" conditions at the hotels it uses. BBC News 7 October 2025

[v] UK poverty statistics | Joseph Rowntree Foundation

[vi] *Understanding asylum seeker and asylum-route refugee vulnerabilities, needs, and support*, p. 100 (data from 2010–2016).

[vii] Evidence to Parliament on racist demonstrations outside asylum hotels