

Written evidence submitted by Hibiscus Initiatives (RRB74)

Renters' Rights Bill: Public Bill Committee

Ensuring the Bill offers equal protection to Black and minoritised migrant women and their children

About Hibiscus Initiatives

1. [Hibiscus Initiatives](#) ('Hibiscus') is a national voluntary sector organisation which has been delivering services to Black, minoritised and migrant women in contact with the criminal justice system and immigration system for over thirty years.¹ Hibiscus supports Black and minoritised migrant women in prison, in immigration detention and in the community. Many of the women Hibiscus supports are victim/survivors of serious harm including trafficking and violence against women and girls (VAWG).
2. Hibiscus has recently published an evidence report, [Unsafe, Insecure: barriers to safe housing for Black and minoritised migrant women and their children](#) and an accompanying [policy briefing](#) making recommendations for reform. The evidence report is based on insights from our frontline workers and the women we support, identifying significant barriers faced by Black and minoritised migrant women seeking safe housing for themselves and their children.

Summary

3. This important Bill will provide much needed protections for renters' rights. However, as currently drafted we are concerned that it does not adequately address the additional barriers faced by Black and minoritised migrant women and their children to accessing safe and suitable housing. We are therefore asking committee members to consider how the Bill could be improved to ensure Black and minoritised migrant women and their children benefit from the same protection as other renters, instead of being left subject to an unjust 'two tier' system.
4. This submission includes anonymised case studies taken from our *Unsafe, Insecure* report; the names have been changed to protect the women's identities.

Rosa

Rosa was placed in temporary accommodation, which was a one-bed flat with terrible damp. Her child developed asthma. There was also a rat in the property that she saw next to her child while they were sleeping. The housing officer was not helpful and concluded that the property was suitable. Rosa's Hibiscus caseworker had to gather medical evidence, including from the GP, and enlist the support of a welfare solicitor. Eventually Rosa was moved.

Proposed improvements to ensure the Bill protects migrant women and their children

5. The Bill includes a number of important reforms to strengthen renters' rights. It must be ensured that Black and minoritised migrant women and their children are included in these new protections. For example:

¹ We use the term 'migrant women' to indicate women without British citizenship.

- (a) The Bill outlaws discrimination by landlords against those in receipt of benefits and those with children. However, discrimination against migrant renters is currently baked into the housing and immigration systems. Our research shows that the right to rent restrictions, alongside other structural barriers, hostile immigration policies, racism and a lack of safe, women-only accommodation, prevent Black and minoritised migrant women accessing safe and suitable accommodation. **Amending the Bill to repeal the right to rent restrictions would go some way to overcoming barriers to safe housing for Black and minoritised migrant women and their children.**
 - (b) The Bill makes provision for a Decent Homes Standard to apply to the private rented sector and temporary accommodation. Our research builds on existing evidence that migrants in asylum seekers' accommodation or temporary accommodation are subject to unacceptable housing conditions. **We call on committee members to support Amendment 72 tabled by Gideon Amos MP to extend the Decent Homes Standard to include asylum seekers' accommodation.**
 - (c) The Bill extends Awaab's Law from the social rented sector to include the private rented sector. In order to ensure the same protection is available to all, including Black and minoritised migrant women and their children, **the Bill should be amended to extend Awaab's Law to ensure it includes temporary accommodation, emergency accommodation and asylum seekers' accommodation.**
 - (d) The Bill introduces a new Ombudsman to protect renters' rights. **The Bill should be amended to introduce a commitment to ensuring the Ombudsman is accessible to migrants, including asylum seekers.**
6. The above measures would need to be accompanied by investment, including funding for local authorities, to allow for proper implementation. We ask committee members to consider the above proposals and ensure Black and minoritised migrant women and their children are not excluded from the important new protections provided by the Bill.

Unsafe, Insecure: barriers to safe housing for migrant women and recommended reforms

7. Our research identifies five key barriers which combine to make Black and minoritised migrant women and their children particularly vulnerable to unsafe and insecure housing and the significant harms associated with this, and recommends reforms:
 - (1) The 'hostile environment' policy and associated structural, legal and procedural barriers (including failures by state agencies to use interpreting services and limited access to legal aid) block mainstream housing routes for Black and minoritised migrant women and their children, and increase stigma and discrimination. **We recommend that the government should end the 'hostile environment' policy and instead support migrant women into education, training and work.**
 - (2) The reliance on poor quality, shared accommodation for migrants, instead of decent, self-contained, family-friendly social housing in communities, causes harm to health and re-traumatisation to Black and minoritised migrant women and their children. **We recommend that central and local government should invest in**

decent, self-contained social housing in communities which is accessible to migrant women and their children.

- (3) The failure to adopt a gender-informed, trauma-responsive and intersectional approach to migrant women's accommodation provision and the housing application process causes harm to Black and minoritised migrant women and their children. **We recommend that all agencies should take a gender-informed, trauma-responsive and intersectional approach to accommodation provision and the application process.**
- (4) The failure to address links between imprisonment or immigration detention and housing problems can increase both the risk of imprisonment and the risk of homelessness for Black and minoritised migrant women and lead to separation of families. **We recommend that the government, criminal justice agencies and local authorities should work together to ensure migrant women are never incarcerated in prison or immigration detention due to a lack of accommodation in the community.**
- (5) The failure to collect and publish data about housing outcomes for Black and minoritised migrant women and their children hampers progress. **We recommend that the government should improve collection and publication of disaggregated data to measure progress in improving outcomes.**

Ruby

Ruby was an asylum seeker living in Home Office accommodation. She was a victim of torture, domestic abuse and trafficking. She was placed in a shared room with another family, which included a man. After a few days her Hibiscus caseworker was able to have her moved to a single room, but it smelled like a dead body.

8. Several of the women taking part in our research complained of living in overcrowded conditions. In one case, a woman was living in a studio flat with her two children, without enough space to live a normal life. She commented:

"If you have problem with papers, it can delay everything... You can see that this woman is sleeping with these two children in one bed... And you are the one telling me that I live in a 'well-furnished house' and that I don't need help...When you don't have papers, they don't want to provide."

9. Another woman with a history of trauma explained:

"Not having somewhere safe [to live] is slowing my recovery – if you're constantly experiencing new trauma how can you deal with it as new ones keep coming up?"

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29 October 2024