

# **COST-BENEFIT ANALYSIS OF EXTENDING SUPPORT TO DOMESTIC ABUSE VICTIMS WITH NRPF**

A technical report for the Domestic Abuse Commissioner

**December 2022**

*Kath Scanlon, Bert Provan, Ria Ivandić, Mariña Fernández-Reino, Christine Whitehead and Fanny Blanc*

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*FINAL REPORT*

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Christine Whitehead and Fanny Blanc



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## Executive summary

### Background

This report provides the technical underpinning to the report by the Domestic Abuse Commissioner's Report<sup>1</sup> laid before Parliament in December 2022. That report was in response to the Home Office request that she set out '*the gaps in evidence available to the Home Office on support for Migrant Victims of Domestic Abuse, by establishing the number of victims and survivors of domestic abuse who have no recourse to public funds, the cost of supporting those who need support, and the cost benefit of such interventions.*'<sup>2</sup>

LSE was asked by the Commissioner to provide a detailed technical analysis to underpin her response. This LSE report provides our views on relevant evidence but no policy recommendations. Such recommendations are made in the Commissioner's report, having considered our evidence alongside the evidence of other stakeholders and people she has consulted.

Our analysis required us to make strong assumptions, and there is significant uncertainty around many of them. There is considerable uncertainty in published validated statistics about the numbers of migrants in the UK with each visa status, and even more uncertainty about numbers of undocumented migrants and of 'visitors'. There is also uncertainty about how many of these migrants currently experience domestic abuse, and an added and independent uncertainty about the proportion of those people who would present at services. We have also had to make various assumptions which affect the costs and benefits. We address and mitigate these and other uncertainties through our sensitivity analysis and additional modelling in this report. In addition, an accompanying Excel workbook sets out in detail our assumptions and how they underpin our conclusions, which allows for further sensitivity analysis and modelling to be done.

### Two scenarios

The Commissioner set out two scenarios to be used in this LSE report. The scenarios were drawn up in light of previous reports and policy discussion<sup>3</sup> around how support might best be given.

The approach considered most promising was to extend the current system. The Destitution Domestic Violence Concession (DDVC) permits certain victims or survivors of domestic abuse with no recourse to public funds to be exceptionally allowed access to such funds if they are destitute; and the Domestic Violence Indefinite Leave to Remain (DVILR) process allows victims or survivors of domestic abuse to apply for indefinite leave to remain in the UK on an exceptional basis.

- Both scenarios envisage an **Emergency Access Phase** (EAP), during which survivors can present themselves at or be referred to a domestic abuse support service. There would then be a maximum 72-hour period to confirm whether or not they are eligible for support. If they are, they will move to the next stage.<sup>4</sup> All survivors irrespective of immigration status can apply, including undocumented migrants, overstayers, visitors to the UK and students with student visas. Access to the next, specialist services, phase does not depend on immigration status.

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<sup>1</sup> Domestic Abuse Commissioner: *Safety before status: the solutions* (2022)

<sup>2</sup> Home Office (2021) *Statement of Outcomes Domestic Abuse Commissioner's Office NRP Research 2021-22*

<sup>3</sup> See for example *House of Lords House of Commons Joint Committee on the Draft Domestic Abuse Bill Draft Domestic Abuse Bill* First Report of Session 2017–19 Report, at paragraph 258.

<sup>4</sup> This process is not dissimilar to the First Responder stage under the Modern Slavery provisions. See Home Office (2022) *Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland*

- b
- Under both scenarios, survivors accepted in the EAP will enter the **Access to Specialist Services Phase** (ASSP) and become eligible for community-based support and accommodation-based services for themselves and any minor children. Community-based services include counselling, case work, and specialist legal advice on immigration status and applications for other support. Accommodation-based services include access to refuge or funding to access other temporary accommodation.

In terms of funding and longer-term migration status for victims, the scenarios differ.

- Under Scenario 1 all survivors can apply for DDVC (for public funds if destitute) and DVILR (to seek indefinite leave to remain in the UK), including those with irregular migration status. Successful applicants will receive public support during an interim period to cover the cost of accommodation and specialist help while their DVILR applications are processed. Our central case assumes that most survivors will require on average six months' support to allow for determination of DVILR applications. Visitors and students are assumed to require a shorter period of support (on average one month).
- Scenario 2 treats regular and irregular migrants differently. Only those with regular migration status can apply for DDVC and DVILR. Those with irregular status can access accommodation and specialist services during the interim period; the cost will be covered through a new special fund, not by allowing access to public funds through the DDVC process. Similarly, irregular survivors would have no automatic right to apply for DVILR. In exceptional circumstances, survivors could apply for a new special visa allowing them to make a DVILR application.

Additional details of the scenarios are set out in the Commissioner's report, including the rationale for the choice of these specific policy options.

### *Migrant numbers and incidence of domestic abuse*

We set out first the basic underlying numbers of migrants who have no recourse to public funds (NRPF). This NRPF condition applies to most non-EEA residents who do not have 'Indefinite Leave to Remain' (ILR) and are thus subject to immigration control. It also applies to people who are in the UK without immigration status and to people visiting the UK with a visitor visa. There are no official figures on the total number of people with NRPF. Overall, we estimate there are about **1.8 million adult migrants with NRPF** in the country. We have used the best available sources for the estimates below, but considerable uncertainty remains. This total is made up of two main groups:

First, people with limited leave to remain, which includes those who are on mainstream immigration routes (work, family and study visas, including dependents); people who are on the family and private life routes (sometimes referred to as '10-year routes to settlement'); people on the British National (Overseas) (BNO) visa route; and people on student visas. Asylum seekers are not included in this report as separate support arrangements apply to them. Our estimates here are:

### Estimated number of adults with limited leave to remain (2020-2021)

Visa type	Women		Men		Total	
	Mainstream visa routes	10-year routes	Main-stream visa routes	10-year routes	Mainstream visa routes	10-year routes
Work – all categories	204,369		195,462		399,831	
Dependent visa	5,448		3,337		8,785	
Family	140,613	60,980	41,342	54,076	181,955	115,056
Other	17,035	8,015	19,810	8,015	36,846	16,029
BNOs*	30,764		30,764		61,528	
Study	256,378		245,699		502,068	
<b>TOTALS</b>	<b>654,607</b>	<b>68,995</b>	<b>536,414</b>	<b>62,091</b>	<b>1,191,013</b>	<b>131,085</b>
			<b>GRAND TOTAL: ADULTS WITH LLR</b>		<b>1,322,098</b>	

See Table 2 in the main report, with accompanying notes

The second group is of undocumented migrants, who lack immigration status and thus do not have a legal right to reside in the UK – which is to say have no ‘leave to remain’ at all. The most recent estimate of the undocumented migrant population in the UK comes from Pew Research Centre, which produced lower and upper bound estimates based on 2017 data. This has then been adjusted for non-UK citizens granted ILR since 2004:

### Undocumented population corrected for non-UK citizens granted ILR since 2004 (283,000)

	Estimated number
Male	248,160
Female	268,840
Under 18	72,380
18-34	227,480
35 to 64	196,460
65+	20,680
<b>TOTAL</b>	<b>517,000</b>
<i>Of which 18+</i>	<b>444,620</b>

See Table 4 in the main report, with accompanying notes and additional details. Based on Pew Research Centre estimates 2017

Finally, there is undetermined number of visitors in the country at any one time. We have not estimated the total figure as it fluctuates so much, but have allowed for a small number of victims in the country as visitors, some of whom will not require visas at all.

We then estimate how many survivors of domestic abuse there are amongst the various groups above, and how likely they might be to subsequently report this abuse and use any available support services. We used two separate sources to produce alternative estimates: the Crime Survey for England and Wales (CSEW), and crime-reporting data. Academic literature has established that domestic abuse is widely under-reported to police authorities and social services. On average in the United Kingdom, about 1 out of 4 victims of domestic abuse report the abuse to the police in a given year (ONS, 2019). The Crime Survey of England and Wales (CSEW, 2018) reported that 31% of individuals experiencing domestic abuse told someone in an official position, most frequently the police (17.3%) and health professionals (17.7%). The reasons why cases go unreported can be personal (embarrassment, fear of retaliation, economic dependency) and/or societal (imbalanced



power relations for men and women in society, privacy of the family, victim blaming attitudes). Another critical factor is that the tools of the criminal justice system can be ineffective in stopping the violence: economic sanctions are often counterproductive as the victim and offender share finances, and arresting the offender generally does not reduce violence or help prevent re-victimization. One study of migrant victims found migration status affected vulnerability: almost two-thirds of women in that study said their perpetrator had threatened deportation if they reported the violence, with more than half having been told by perpetrators that they would lose their visa if they reported it. Migrant survivors without access to public funds are particularly vulnerable to such abuse, as they often depend economically on their abusers.

Our estimates on incidence and reporting compare the migrant population to a similar population of UK residents by age and gender using the Crime Survey of England and Wales. We then used both that survey and evidence of police reports of domestic abuse from a large English police force to estimate the numbers who may engage with services. These numbers were then broken down into the categories of migrants provided in the initial estimates of numbers in the first section, and final numbers to support the Cost Benefit Analysis (CBA) were estimated. In the costs section we make further assumptions about how many of those who report would seek help from specialist services and require accommodation. The numbers in the table below are based on the CSEW data, and informs the subsequent estimates of costs and benefits.

### **CSEW-based estimates of numbers of victims who would report and seek help, by migration status**

<b>1 Migration status</b>	<b>2 Numbers of victims who would engage with specialist services</b>	<b>3 Of whom, would seek help from specialist services and require accommodation</b>
On mainstream routes including BNOs	9,811	2,943
On 10-year routes	2,688	806
Irregular/undocumented	8,289	1,658
Visitors/students	11,256	2,251
<b>TOTALS</b>	<b>32,044</b>	<b>7,659</b>

See Table 8 of the main report and accompanying notes

### **Costs and benefits (gains)**

We modelled the costs<sup>5</sup> of Scenarios 1 and 2 per survivor household, broken into two stages:

- the Access to Specialist Services Phase for the first period of assistance (lasting from one to six months, and including emergency accommodation – as in the table above) and
- a later extended support phase for those who are granted DVILR. *This is not an extension of the work undertaken by support agencies in the scenarios described above.* Rather this refers to the costs (mainly to public funds) consequent on being granted DVILR. The length of the extended support phase varies depending on the migration status of the survivor.

<sup>5</sup> Modelling of both costs and gains was carried out from May-July 2022. The figures have not been updated for subsequent inflation.

The model incorporates assumptions about numbers at various stages of the proposed new services, and these affect the costs and benefits generated. The main assumptions are the period of time victims spend in each stage including the period of receipt of welfare benefits or similar payments, the proportions granted DVILR, and the levels of take-up. Similarly, calculation of benefits relies on assumptions about for example how soon victims could get a job.

In relation to the “Business as Usual” element of the CBA, and in relation to the likely benefits through reduced incidence addressing the cost of incidents of domestic abuse, we have drawn on the wide literature on the costs of domestic abuse. The detailed estimates provided in the Home Office 2019 report *The economic and social costs of domestic abuse* are particularly helpful. This report consolidates much of the previous evidence, and estimates the social and economic cost for victims of domestic abuse in year ending March 2017 in England and Wales to be approximately £66 billion.

Under both scenarios, migrant victims of DA are entitled to immediate support from a dedicated fund. This would cover the cost of accommodation and subsistence for victims and their children for an initial period (in the central case, we have modelled an **initial Access to Specialist Services Period (ASSP) of 6 months for regular migrants and undocumented/irregular migrants, and 1 month for visitors and students**). Because a high proportion of victims are in London, we assume that **the payment will be the equivalent of the median Universal Credit payment for that household type in London**, pro rata to the support period.

In addition, there will be a separate funding element to cover the specialist support services that would not be covered by Universal Credit. These include support groups, signposting to solicitors, counselling and advocacy/casework. The cost of these is an average, taken from recent Home Office research (unpublished). We estimate that **specialist support will cost £2,000 per victim helped**, based on that work and on figures provided by specialist services and other research in the sector.

The central estimate for the cost of initial ASSP support is **£42 million** for the first annual cohort in Year 0. Note that this cost is the same under Scenarios 1 and 2; they differ in terms of the funding mechanism through which initial support is delivered, but not in terms of the amount.

**Cost of ASSP initial support, Scenarios 1 and 2 (Y0, first annual cohort)**

UC equivalent during initial period	£30,476,913
Additional amount for specialist services	£11,190,213
TOTAL	<b>£41,667,126</b>

See Table 11 of the main report

For the “extended support phase”, to which some victims move after the initial ASSP phase, the costs differ between Scenario 1 and Scenario 2. The main cost is Universal Credit, as under ILR access to public funds in general is awarded.

**Cost of ongoing support for migrants who are awarded ILR and those who re-present to services, Scenarios 1 and 2 (Year 1 cost, first yearly cohort)**

	Scenario 1	Scenario 2
Universal Credit	£26,042,742	£24,296,215
Child benefit	£2,796,790	£2,632,586
Residual admin and public sector costs	£1,619,621	£1,619,621
Additional costs for unsuccessful ILR applicants who re-present		£2,849,179
GROSS TOTAL	<b>£30,459,153</b>	<b>£31,397,601</b>
Business as usual (BAU) costs	(£16,196,208)	(£16,196,208)
TOTAL COSTS NET OF BAU	<b>£14,262,944</b>	<b>£15,201,393</b>

See Table 12 of the main report

Green Book recommends modelling over ten years. We did this in three stages: first, we estimated costs for the first year, which consisted of both initial ASSP assistance and longer-term help for some migrants. Second, we modelled costs and gains for ten years for the first cohort of victims, and finally, on the assumption that similar numbers would come forward each year, we modelled costs and gains over a ten-year period for all annual cohorts. Annex C provides details.

Over a decade, the net costs of implementing new policies under both scenarios would be about **£537 million** in present value terms. Tables A17 and A21 in Annex C set out ten-year cost calculations for Scenarios 1 and 2, and the more detailed workings are in the accompanying spreadsheet.

Turning to benefits, we identified four main areas of gain that could be expected from a change in policy that would extend support to migrant victims with NRPF. Most of the gains would accrue to survivors and their families, but some would benefit the public sector and wider society. The main categories of gain that are quantified in our model are:

- Physical and emotional harm prevented—a benefit to the victim
- Homelessness and destitution prevented—again, a benefit to the victim
- Improved employment prospects and work skills – a benefit to both victim and the public sector and wider economy
- Gains for children in households where there is domestic abuse

There are other, wider gains (e.g. improved community cohesion) that are discussed but not modelled in the CBA.

In estimating gains we drew on the extensive literature on costs of domestic abuse, mentioned briefly above, as well as additional evidence from stakeholder agencies working with survivors. Much of this evidence cited specific issues experienced by migrant survivors, as well as evidence around the effectiveness of “by and for” services provided by support groups staffed by people from similar migrant backgrounds and often with personal experience of domestic abuse.

We adjusted the expected gains to reflect that undocumented or other migrants who are denied DVILR or do not hold other relevant visas could be subject to deportation proceedings. Given the remit of the Domestic Abuse Commissioner and the Home Office, we have only included benefits (whether for the victims themselves or local communities) which would be realised in the UK.

## CBA summary: central estimates

The table below summarises our central estimates of costs and gains (benefits) over ten years for the **first annual cohort of victims**. Costs vary only slightly between the two scenarios, with each costing around £61.5 million in present value terms. Gains are higher under Scenario 1 (£246 million) than Scenario 2 (£226 million). The BCR over ten years for the first annual cohort is 4.0 for Scenario 1, and 3.7 for Scenario 2.

### 10-year CBA: first cohort of victims

	Scenario 1	Scenario 2
10-year PV of net costs for Y0 cohort	<b>£61,683,989</b>	<b>£61,305,066</b>
<b>Gains: Y0 cohort, 10-year PVs</b>		
Physical & emotional harm prevented	£106,703,310	£100,766,469
Homelessness & destitution prevented	£26,369,187	£24,373,581
Employment & skills, including higher tax revenues	£91,014,626	£80,711,788
Children's gains	£22,077,684	£20,407,318
Total of PVs of gains: Y0 cohort	<b>£246,164,807</b>	<b>£226,259,156</b>
<b>Benefit-cost ratio, 10 years, Y0 cohort</b>	<b>4.0</b>	<b>3.7</b>

See Table 22 of the main report

Assuming a similar number of victims would present in each year, we calculated costs and gains for **ten annual cohorts of victims**. Over ten years, for all cohorts, again the costs would differ little between Scenarios 1 and 2, with present-value totals of both coming in at around £537 million. The present values of gains would exceed £2 billion in both scenarios. Gains are higher under Scenario 1 (£2.3 billion) than Scenario 2 (£2.1 billion). The BCR over ten years for ten annual cohorts is higher for Scenario 1 (4.3) than Scenario 2 (3.9).

### 10-year CBA: ten annual cohorts

	Scenario 1	Scenario 2
Sum of PVs of costs: 10 annual cohorts	£536,826,358	£536,719,998
Sum of PVs of gains: 10 annual cohorts	£2,293,420,355	£2,107,967,253
<b>Benefit-cost ratio (BCR) 10 years, 10 annual cohorts</b>	<b>4.3</b>	<b>3.9</b>

See Table 23 of the main report

### Modelling alternative scenarios

For our sensitivity analysis we modelled some specific different scenarios, and compared each to the baseline above. These were:

- Assume 70% fewer people come forward for help
- Use police prevalence data rather than Crime Survey of England & Wales to estimate numbers
- Reduce the Access to Specialist Services Phase period from 6 months to 3
- Reduce total time on Universal Credit to 9 months total, for DVILR cases
- Assume that 40% of main group attain ILR rather than 76%
- Use UC benefit cap rates and not London median
- Replace UC rates for basic income with asylum seeker rates (S98)
- Use police prevalence data, limit ASSP to 3 months, further 3 months UC for DVILR cases
- Exclude gains for children

In summary, what emerged was:

- Cost benefit ratios remain similar with changes to the numbers of survivors assisted. There is considerable uncertainty about how many migrants there are, how many may be survivors of domestic abuse, how many may engage with any new services provided, and the capacity of services for survivors to gear up to deliver new services. The benefit-cost ratios are not particularly sensitive to how many engage, as additional cases also are likely to bring additional gains.
- A key driver of overall costs, and also of BCRs, is the amount of basic income paid to survivors and for what period. Reducing the period of intensive support (ASSP period) would reduce costs to some extent. Higher levels of savings would come from reducing the assumed period during which survivors who are awarded DVILR remain on Universal Credit
- Similarly, if the amount of Universal Credit in payment is set at the maximum (benefit cap level) and not the central case rate of the median London UC payment, then the costs considerably increase, and BCR ratios reduce sharply
- In contrast assuming basic income was paid at a rate similar to that paid to asylum seekers, but still allowing for the need to provide funding for accommodation in refuges or other temporary or permanent accommodation, would produce a 25% reduction in overall 10-year NPV costs and a marked increase in BCRs.
- Under all individual variations of the model there remained a positive BCR, which is to say that the benefits are likely to be of greater social value than the costs.
- Modelling a combined range of reduced numbers, shorter periods in ASSP support and shorter overall periods of UC provision shows a significant increase in CBA ratios and a 75% reduction in overall 10-year NPV costs. Because support would be provided for a shorter period the associated gains might be smaller, but we have not modelled that.

## 1 Introduction

This report provides estimates of the costs and benefits of two potential ways of extending support to all victims of domestic abuse regardless of migration status. There is currently a system to extend support to migrant survivors of domestic abuse with NRPf, but it is limited to migrants with a certain type of family visa. Other categories of migrant including those on work visas, undocumented migrants and students are ineligible.

The Home Office/Domestic Abuse Commissioner's Office brief for this work is to conduct:

*research to address the gaps in evidence available to the Home Office on support for Migrant Victims of Domestic Abuse, by establishing the number of victims and survivors of domestic abuse who have no recourse to public funds, the cost of supporting those who need support, and the cost benefit of such interventions. (The report) will also provide key recommendations to Government to influence policy and decision making following the Support for Migrant Victims Fund in 2022.<sup>6</sup>*

This report accompanies a separate document<sup>7</sup> published by the Domestic Abuse Commissioner ('the Commissioner'). The cost benefit numbers in the Commissioner's report are based on a 'central case' which we have estimated, and which follows her guidance in relation to the options to be costed (the 'scenarios'). This LSE report provides details of the analysis, methodology, primary research findings and recommendations around that central case. It examines the evidence around the likely numbers of migrants with different categories of visa, or no visa, who are in the UK, then goes on to look at evidence around how many may be victims and survivors of domestic abuse. We then estimate the likely number who might present at agencies who can provide support and advice. These numbers are fed into a spreadsheet model to produce estimates of the costs of providing the type of support and services in each of the Commissioner's scenarios. A further estimate is then made of the benefits of the provision of those services (gains to the public purse, to survivors themselves and to wider society). These benefits comprise future harm prevented and the savings to the public sector of addressing such harm; increased opportunities for survivors and eventually their children to contribute productively to society; and increases in the wellbeing of families, which produces social value.

As the Commissioner required, the main part of this report is '*presented in a way that is easily understood by a wide audience, and that reflects the tone and principles of the Domestic Abuse Commissioner's Office*'. We have not made specific policy recommendations, but rather provided relevant evidence which can inform such policy decisions.

The analysis we have done requires strong assumptions to be made, and there is significant uncertainty around many of these assumptions. There is also considerable uncertainty in published validated statistics about the numbers of migrants in the UK with each visa status, and even more uncertainty about numbers of undocumented migrants and of 'visitors'. There is also uncertainty about how many of these migrants currently experience domestic abuse, and an added and independent uncertainty about the proportion of those people who would seek help.

We address and mitigate these and other uncertainties through our sensitivity analysis and additional modelling in this longer methodological report. That is, we have set out in more detail the evidence used to estimate the numbers and to provide the assumptions used in the Commissioner's report. We have also given details of the specific sensitivities of the

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<sup>6</sup> Home Office (2021) *Statement of Outcomes Domestic Abuse Commissioner's Office NRPf Research 2021-22*

<sup>7</sup> Domestic Abuse Commissioner (2022) *Safety Before Status: The Solutions* <https://domesticabusecommissioner.uk/>

modelling of numbers, costs, and benefits, the risks and uncertainties in the modelling. This sensitivity testing produced additional sets of CBA outcomes based on different numbers and assumptions to those used in the central case.

This LSE report reflects several contextual factors:

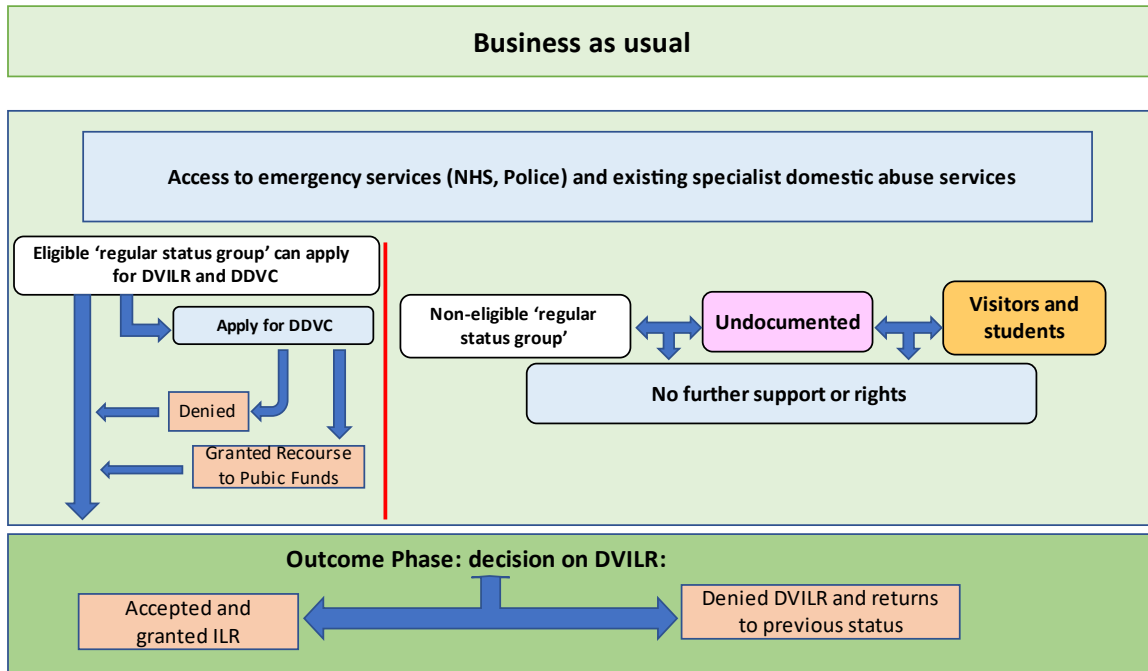
- The overarching policy imperative set out by the Commissioner which is to provide immediate and appropriate support to survivors of domestic abuse, in order to enable them to access the support they need which therefore removes them from a dangerous situation and works towards breaking the cycle of abuse. There is a requirement in our brief to provide evidence around options, which we have taken to include exploring the most cost-effective variations which could deliver this imperative in the context of her choice of scenarios.
- The uncertainty about how long support will be required. Sector experts stress that in order to break the cycle of abuse a considerable period of support is required, but we have modelled options where intensive income- and accommodation-based support is provided for a shorter period than community-based support.
- Other programmes that also address the needs of migrants with no recourse to public funds – for example Section 98 support for asylum seekers under the 1999 Immigration Act and the Modern Slavery Act 2015. These offer different levels of support; neither provides support at Universal Credit levels or wider access to public funds such as child benefit.
- The risks of abuse for the purposes of gaining immigration status. The Commissioner and the domestic abuse support sector are unaware of any cases where survivors have come forward to make unwarranted claims for support, and indeed emphasise that the main issue is that many survivors do not seek support due to fear or to lack of knowledge that they have the right to this support. But introducing a direct route to indefinite leave to remain is undoubtedly a risk that must be considered in modelling the scenarios.

The report has five more sections. In section 2 we set out alternative scenarios for providing support to migrant victims with NRPF, as developed by the DAC. The third section covers the estimation of the numbers of migrants with NRPF, and the numbers who might be victims of abuse. The fourth section sets out the approximate costs of providing support under the two scenarios, while the fifth section addresses the likely benefits of such support. The sixth and final section brings together the social cost-benefit analysis, together with a concluding discussion.

## 2 The Commissioner’s scenarios (options) to provide support

The overview flow chart for the current ‘business as usual’ system of accessing support appears in Figure 1. This shows that migrants victims with NPRF currently fall into two groups: those who are eligible to apply for the DDVC and DVILR, and those who are not.

**Figure 1: Business as usual flow chart**



The objective of this report is to set out the costs and benefits of policy change that would provide support for *all* migrant victims of DA, regardless of migration status. The brief for the work requires us to set out

*an estimate of the length of time support would be needed for victims on average, the level of support needed, and the cost of providing this support on a national scale.*

The Commissioner set out two scenarios which she wished to be used in this LSE report. The scenarios were drawn up in light of previous reports and policy discussion<sup>8</sup> around the ways in which this support might best be given.

The approach considered most promising was to extend the current system, represented in Figure 1. The Destitution Domestic Violence Concession (DDVC) permits certain victims or survivors of domestic abuse with no recourse to public funds to be exceptionally allowed access to such funds if they are destitute; and the Domestic Violence Indefinite Leave to Remain (DVILR) process allows victims or survivors of domestic abuse to apply for indefinite leave to remain in the UK on an exceptional basis.

The DAC developed two scenarios based on this existing model. Scenarios 1 and 2 are described in brief below. Steps 1 and 2 are common to both scenarios; in step 3 they differ.

<sup>8</sup> See for example *House of Lords House of Commons Joint Committee on the Draft Domestic Abuse Bill Draft Domestic Abuse Bill First Report of Session 2017–19 Report*, at paragraph 258.



1. Both scenarios envisage an **Emergency Access Phase** (EAP), during which survivors can present themselves at or be referred to a domestic abuse support service. There is then a maximum 72-hour period to confirm whether or not they are eligible for support. If they are, they will move to the next stage.<sup>9</sup> All survivors irrespective of immigration status can apply, including undocumented migrants, overstayers, visitors to the UK and students with student visas. Access to the next phase does not depend on immigration status.
2. Under both scenarios, survivors accepted in the EAP will enter the **Access to Specialist Services Phase** (ASSP) and become eligible for community-based support and accommodation-based services for themselves and any minor children. Community-based services include counselling, case work, and specialist legal advice on immigration status and applications for other support. Accommodation-based services include access to refuge or funding to access other temporary accommodation.
3. In terms of funding and longer-term migration status for victims, the scenarios differ.
  - Under Scenario 1 all survivors can apply for DDVC (for public funds if destitute) and DVILR (to seek indefinite leave to remain in the UK), including those with irregular migration status. Successful applicants will receive public support during an interim period to cover the cost of accommodation and specialist help while their DVILR applications are processed. Our central case assumes that most survivors will require on average six months' support to allow for determination of DVILR applications. Visitors and students are assumed to require a shorter period of support (on average one month).
  - Scenario 2 treats regular and irregular migrants differently. Only those with regular migration status can apply for DDVC and DVILR. Those with irregular migration status can access accommodation and specialist services during the interim period; the cost will be covered through a new special fund, not by allowing access to public funds through the DDVC process. Similarly, irregular survivors would have no automatic right to apply for DVILR. In exceptional circumstances, survivors could apply for a new special visa allowing them to make a DVILR application.

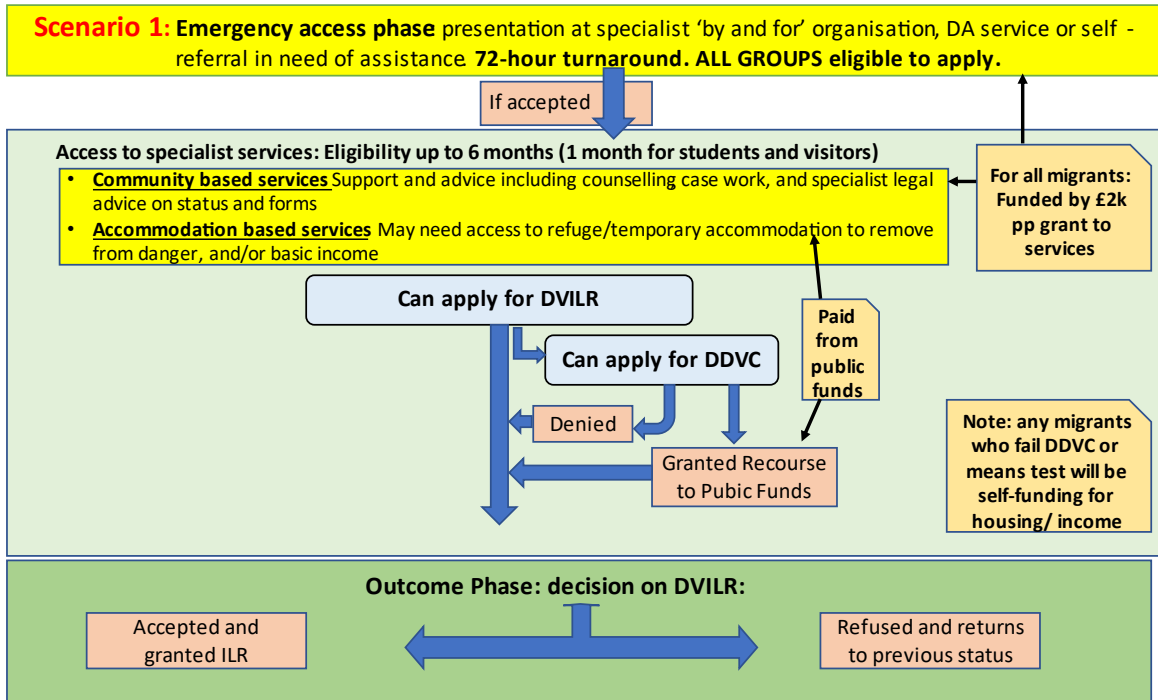
Additional details of the scenarios are set out in the Commissioner's report, including the rationale for the choice of these specific policy options.

Figures 2 and 3 below provide a graphic overview of each scenario. Note that the flow charts apply only to those migrants who do not currently have access to DDVC and DVILR. The process for those that do have access to DDVC and DVILR is as Figure 1 above.

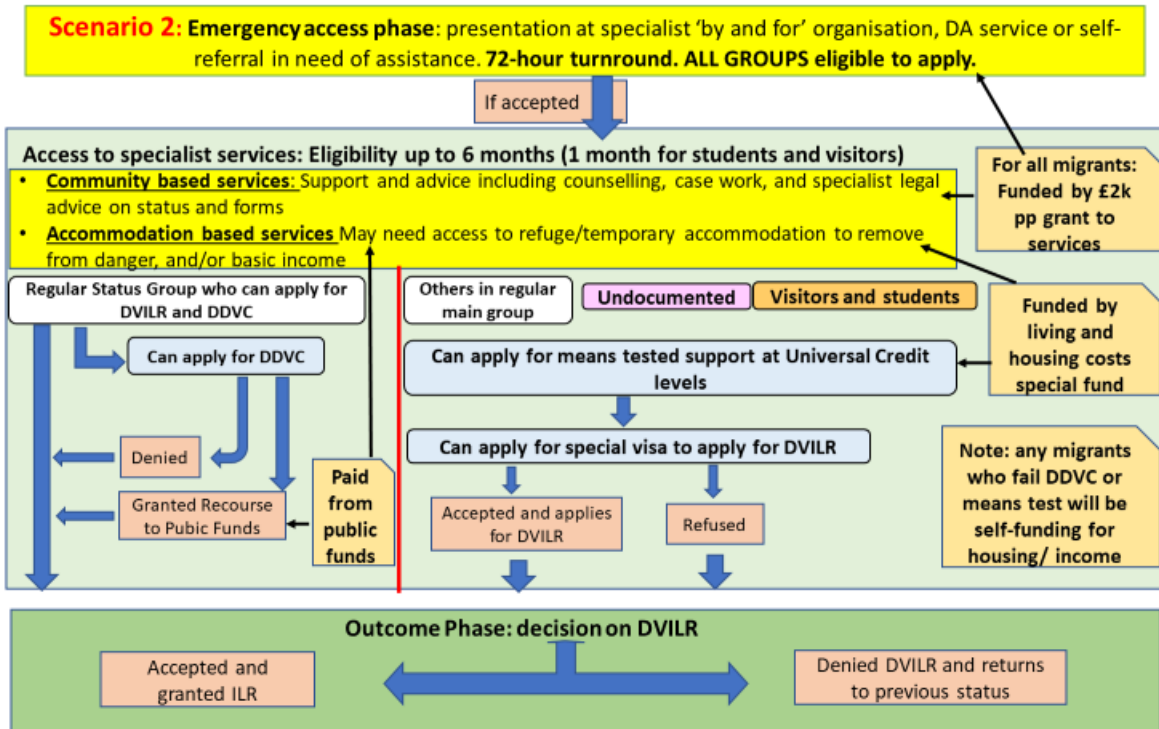
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<sup>9</sup> This process is not dissimilar to the First Responder stage under the Modern Slavery provisions. See Home Office (2022) *Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland*

**Figure 2: Scenario 1 flow chart**

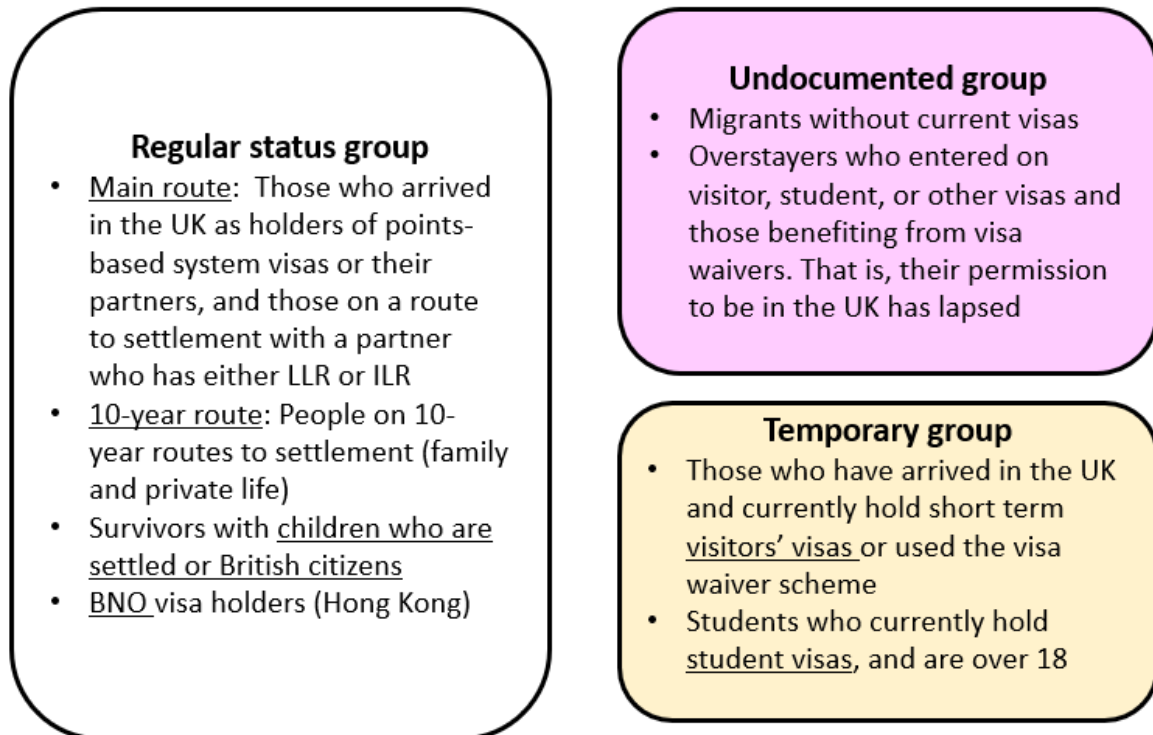


**Figure 3: Scenario 2 flow chart**



The migrant groups referred to in these diagrams are classified in Figure 4<sup>10</sup>.

**Figure 4: Classification of migrant groups with No Recourse to Public Funds**



<sup>10</sup> Our classifications were developed specifically for the requirements of this project and do not align with those normally used in migration studies.

### 3 Estimates of numbers of NRPF migrants

#### Overview

The 'No Recourse to Public Funds' (NRPF) condition applies to most non-EEA residents who do not have 'Indefinite Leave to Remain' (ILR) and are thus subject to immigration control. It also applies to people who are in the UK without immigration status and to people visiting the UK with a visitor visa. Among the factors shaping the impacts of lifting the NRPF condition are the number of people in each category of 'leave to remain' affected, and the amount of time that they spend in a status that has the NRPF condition. There are no official figures on the total number of people with NRPF.

This section outlines the different groups of people subject to NRPF and what is known about their duration of stay in the UK and their number. In doing so, we address

- How many people are likely to be in each of the main leave categories with NRPF (shown in Figure 4 above)
- How many of these are likely to be survivors of domestic abuse
- How many survivors would report abuse to an authority, and
- How many would present for assistance to public services, were they to be made available.

In more detail, there are two main groups of people who are subject to the NRPF conditions:

First, people with limited leave to remain, which includes those who are on mainstream immigration routes (work, family and study visas, including dependents); people who are on the family and private life routes, which are sometimes referred to as '10-year routes to settlement'; people on the British National (Overseas) (BNO) visa route; and people who are in the UK on a visitor visa.

Secondly, undocumented migrants, who lack immigration status and thus do not have a legal right to reside in the UK--that is, they do not have 'leave to remain'--at all. Asylum seekers are not included in this report as separate support arrangements apply to them. Refused asylum seekers (those whose asylum application and appeal have been unsuccessful), however, are included in the undocumented population.

At this point it is useful to set out the final numbers used in the CBA as the basis for costs and benefits. Table 1 below summarises our central estimate of how many survivors of domestic abuse with the NRPF condition would likely take advantage of the proposed policy, were it to be put in place, and engage with support services. It is broken down in terms of the type of visa they hold, including those who hold no visa. Estimates are based on a range of official and other published data, as explained below, using figures as of 2020.

There is considerable uncertainty in published validated statistics about the numbers of migrants in the UK with each visa status, and even more uncertainty about numbers of undocumented migrants and of 'visitors'. There is also uncertainty about how many of these migrants experience domestic abuse, and what proportion might report this abuse to any available services. To address these uncertainties, we have modelled several variations to the central estimates in this report. Those covered by this table all have the NRPF condition. The specific methodology for providing numbers in each of the categories in the table is set out in more detail in the remainder of this section.

With these qualifications, the numbers used in the central case, which is to say the number of potential beneficiaries of the policy change proposed by the Commissioner, are:

**Table 1: Estimated number of NRPF survivors who would engage with new support services, by migration status**

Numbers of victims who would engage	
On mainstream routes including BNOs	9,811
On 10-year routes	2,688
Irregular/undocumented	8,289
Visitors/students	11,256
<b>TOTALS</b>	<b>32,044</b>

### *Mainstream visa holders*

Table 2 below summarises the numbers of adults with temporary leave to remain (i.e., not Indefinite Leave to Remain (ILR)), by the type of visa they hold<sup>11</sup>. Most of the data are for the most recent period for which data were available at the time of writing, which was December 2020. However, we have also added figures from the BNO route in 2021. Some of the people included in the figures will have left the UK prior to the expiry of their visas, and elsewhere we make adjustments for this. Those covered by this table all have the No Recourse to Public Funds condition. The different types of visas are discussed below.

**Table 2: Summary table. Estimated number of adults with limited leave to remain (2020-2021)**

Category of leave	Women		Men		Total	
	Mainstream visa routes	10-year routes	Mainstream visa routes	10-year routes	Mainstream visa routes	10-year routes
Work – all categories	204,369		195,462		399,831	
Dependent visa	5,448		3,337		8,785	
Family	140,613	60,980	41,342	54,076	181,955	115,056
Other	17,035	8,015	19,810	8,015	36,846	16,029
BNOs*	30,764		30,764		61,528	
Study	256,378		245,699		502,068	
<b>TOTALS</b>	<b>654,607</b>	<b>68,995</b>	<b>536,414</b>	<b>62,091</b>	<b>1,191,013</b>	<b>131,085</b>
<b>GRAND TOTAL: ADULTS WITH LLR</b>						<b>1,322,098</b>

Source: *Migrant Journey: report 2020 and FOI 68608, 68698, and 69526.*

Note: BNO figures are visa grants data for 2021; all other figures are for the end of December 2020. Numbers in the total column may slightly differ from the sum of the women and men columns. People in the family and private routes (10-year routes) are included in the 'family' and 'other' categories in the Migrant Journey: report data.

\*Gender breakdown for BNO visas not available at time of modelling, so a 50/50 distribution was assumed

### *People on work, family, or study mainstream visa routes*

The largest category of visa-holders with NRPF comprises people who moved to the UK on work, family or study visas, which represent the three principal mainstream visa routes. People moving to the UK on family visas will be eligible for ILR after five years of continuous residence. This is also the case for many work-visa holders (e.g., skilled worker visa), although some work visas are strictly temporary.<sup>12</sup> Student visas do not provide a direct path to settlement either. This means that people on student visas will need to switch to a

<sup>11</sup> Fuller breakdowns of the figures for those on mainstream visa routes, and on the ten-year route to settlement, appear in Annex B.

<sup>12</sup> Although some work visas are strictly temporary (e.g. they expire after a given period and cannot be renewed, as in the case of the Youth Mobility Scheme), or they do not lead directly to settlement and holders must switch to another category first (as in the case of Intracompany Transfers)

different visa category (e.g., long-term work or family visa) and stay on those visas for five years before applying to ILR. Estimates of the number of adult residents on mainstream routes comes from Migrant Journey Report 2020.

There are approximately **367,000 adults** on mainstream visas with five-year routes to settlement, not including people on BNO visas (discussed below).

### *People on ten-year routes to settlement*

Some people hold leave to remain that explicitly requires them to be in the UK for at least ten years before settlement. These **ten-year routes to settlement** (family life as a partner or parent, and private life and exceptional circumstances) also have the NRPF condition normally applied to them<sup>13</sup>. Residents with a family in, or long-term ties to, the UK can rely on the right to family or private life protected by Article 8 of the European Convention on Human Rights (McKinney and Sumption, 2021). The family and private life ten-year routes function in practice as a means to regularisation in the UK (Gardner and Patel, 2021), and are available to people who have overstayed a previous visa.

People on family and private life routes cannot be separately identified within Migrant Journey data, which is the main data source used to estimate the number of people with different immigration statuses at a given point in time. Those on the family life route are included in the family category, while those on the private life route are in the 'other' category. In addition, some will not be in the data at all, because they did not enter on one of the mainstream entry visa categories. In some cases, for example, they are living in the UK without valid immigration status and have their status regularised because they qualify for one of the ten-year routes. This report uses additional data supplied by the Home Office on people whose first recorded grant of leave was in-country, in order to ensure that such people are included.

People in the ten-year routes need to renew their visas every 2.5 years if they are still in the UK. Importantly, qualitative research with migrants on ten-year routes has suggested that costs and the need to make repeated applications every 2.5 years can lead to people losing status and having to start the ten years again (Gardner and Patel, 2021). This complicates efforts to estimate how long people currently living in the UK on a ten-year route still have left until they will be eligible for ILR.

We estimate there are approximately **131,000 adults on ten-year routes** to settlement. This is lower than previously published estimates because children are excluded.

### *British Nationals (Overseas) (BNO) visa route*

In 2021 the government introduced a scheme for Hong Kong nationals, that allows BNO citizenship holders to reside in the UK. The BNO citizenship was created by the Hong Kong Act 1984 and was offered to Hong Kong residents who held British Dependent Territories Citizenship (BDTC). BDTC holders could apply for BNO status until 1997, when Hong Kong was handed over to China. BNO citizenship cannot be passed on to spouses and children (Walsh, 2021; Gower and Kirk-Wade, 2021). Based on Home Office estimates, there are approximately 2.9 million BNOs and 2.3 million BN(O) dependents living in Hong Kong (Gower and Kirk-Wade, 2021: 19).

A total of 75,961 people, including dependent children, used this route to come to the UK in 2021, when the route started. Based on a survey of 500 BNO visa holders conducted by the

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<sup>13</sup> People on family visas (5-year route) and those on ten-year routes (family and private life) can apply for a change of conditions to have the NRPF condition removed if they become destitute or are at imminent risk of destitution.

Home Office and IFF<sup>14</sup>, 52% of visa holders were women and 59% had at least one child under 18. The publicly available data only includes main applicants and thus does not provide the exact share of those who arrived who are under 18. Given that the profile of BNO applicants is similar to those in the Skilled Worker route (former Tier 2), we assume that the share of dependent children is the same (19% among Tier 2 visa holders, based on Migrant Journey: report 2020). This gives a total of approximately **62,000** BNO adults. This implies that roughly half of all dependents were children, which is plausible given that some families will have no children, and some will have more than one.

### *Temporary migrants: Students and visitors*

We have treated students and visitors separately in our modelling, as we assume that most intend to stay only temporarily in the UK. Student visas do not provide a direct path to settlement. This means that migrants on student visas would need to switch to a different visa category (long-term work or family) and stay on those visas for five years before applying to ILR. There are approximately **500,000 adults on student visas** in the UK.

Adding all the groups together, the overall total of adult visa-holders with NRPF who are legally in the UK including those on study visas is approximately **1.3 million**. This is similar to previously published figures (Migration Observatory, 2020) despite excluding children; this is because we have used more recent data, included an estimate for BNO visa holders, and included people whose first grant of leave was made in-country.

There are no figures on the number of visitors in the country at any one time. A standard visitor visa for tourism, business, or study (courses up to six months) permits a stay of up to six months, but the citizens of many countries (USA, EU) do not require visas to enter, and the number of visitors in the country exhibits strong seasonal variation. In a normal year, tens of millions of non-UK passengers come to the UK (Home Office, 2022), although the vast majority will stay for short periods (e.g. a few days or weeks) and have no need for services or support of any kind while they are in the UK<sup>15</sup>. While we cannot estimate the number of visitors in the country, there is evidence from specialist by-and-for services that a small number of victims are on unexpired visitor visas. Those who entered on visitor visas but have overstayed are included in the figures for undocumented migrants.

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<sup>14</sup> Home Office (2022) Survey of Hong Kong British National (Overseas) visa holders 2021. [Available online](#).

<sup>15</sup> Source is the data tables embedded in this briefing: Home Office (2022) Statistics relating to passenger arrivals in the United Kingdom since the COVID-19 outbreak, May 2022. [Available online](#).

### People without immigration status

There are no official statistics about the size or characteristics of the population living in the UK without legal status, whom we refer to as undocumented migrants. There are four main ways in which a person can become an undocumented migrant in the UK (Walsh, 2021):

- People who enter the UK regularly (i.e. with an entry clearance visa) and breach the conditions attached to their visa, such as overstaying, doing work that is not permitted, or having a criminal conviction.
- People who enter the UK irregularly or through deception.
- Asylum seekers who do not leave the country after their application has been rejected and all rights of appeal exhausted.
- People born in the UK to parents who are undocumented. These children are typically included in estimates of the UK's undocumented population, although some of them can acquire citizenship directly. In those cases, parents might also be able to regularise their situation through the family or private life ten-year routes.

The most recent estimate of the undocumented migrant population in the UK comes from the Pew Research Centre, which produced lower and upper bound estimates based on 2017 data. Excluding asylum seekers, the Pew estimates range from 800,000 to 1.2 million.

**Table 3: Undocumented population in the UK per Pew estimates**

	Lower-bound estimate	Upper-bound estimate	Estimated %
Male	384,000	576,000	48%
Female	416,000	624,000	52%
Under 18	112,000	168,000	14%
18-34	352,000	528,000	44%
35 to 64	304,000	456,000	38%
65+	32,000	48,000	4%
<b>TOTAL</b>	<b>800,000</b>	<b>1,200,000</b>	<b>100%</b>

Source: Based on the Pew Research Centre estimates, 2017. Note: includes children of unauthorised migrants even though a share of those will be UK citizens.

Pew used the 'residual method' to calculate the size of the undocumented population in the UK, for which two estimates are required:

1. Number of non-EU citizens living in the UK, for which Pew relied on the Annual Population Survey, which is the largest household annual survey in the UK.
2. Number of people with leave to remain in the same year. Pew relied on an estimate of non-EU citizens holding a valid residence permit each year that the Home Office is required to report to Eurostat.

The government does not know the exact number of non-UK citizens with ILR in the UK, but Migrant Journey data indicate that between 2004 and 2017, around 283,000 non-EU citizens were granted ILR but did not become UK citizens. Based on ONS data, the number of long-term residents with ILR that was granted *before* 2004 could be over 200,000 (Walsh and Sumption, 2020).



For this report we have modified the Pew estimates to correct for those granted ILR since 2004 (Table 4 below), but not for the unknown number of people granted ILR before 2004. The resulting lower-bound estimate was used as the basis for our calculations—that is, 517,000 undocumented persons of which an estimated **444,620** are adults.

**Table 4: Undocumented population corrected for non-UK citizens granted ILR since 2004 (283,000)**

	Lower-bound estimate	Upper-bound estimate	Estimated %
Male	248,160	440,160	48%
Female	268,840	476,840	52%
Under 18	72,380	128,380	14%
18-34	227,480	403,480	44%
35 to 64	196,460	348,460	38%
65+	20,680	36,680	4%
<b>TOTAL</b>	<b>517,000</b>	<b>917,000</b>	<b>100%</b>
<i>Of which 18+</i>	<b>444,620</b>		

Source: Migration Observatory calculations based on Pew Research Centre estimates, 2017

Note: the number of non-UK citizens granted ILR, excluding citizenship, from 2004 to 2017 (283,000) has been estimated with Home Office Migrant Journey: 2020 report data. The distribution of the undocumented population by age and sex is based on Pew Research Centre estimates.

### Summary

Overall, we estimate there are about **1.8 million adult migrants with NRPF** in the country: 1.3 million with visas or regular migration status (Table 2), and about half a million without (Table 4). This does not include visitors, whose numbers fluctuate. The next section sets out the issues and options for moving beyond the numbers of migrants with NRPF to the more specific estimates of how many of these people might be survivors of domestic abuse, and in addition the likelihood of those survivors using any new services provided.

## 4 Incidence and reporting of domestic abuse amongst migrants with NRPF

In this section we summarise our estimates of domestic abuse prevalence and reporting amongst migrants with NRPF and likelihood of reporting this abuse and using any newly available support services. We used two separate sources to produce alternative estimates: the Crime Survey for England and Wales (CSEW), and aggregated crime-reporting data. Annex B treats the subject of estimating incidence and reporting more fully, and Annex C contains technical details of the calculations performed; the emphasis in this section is on the numbers that feed into the SCBA.

### *Context of estimating incidence and reporting of domestic abuse*

Domestic abuse is different from many other crimes, in part due to the close relationship between victim and offender, which makes reporting much less likely than for other types of crime (Gracia, 2004). Academic literature has established that domestic abuse is widely under-reported to police authorities and social services. International evidence indicates that reported cases of domestic violence against women represent only a very small share when compared with prevalence data. On average in the United Kingdom, about 1 out of 4 victims of domestic abuse report the abuse to the police in a given year (ONS, 2019). The Crime Survey of England and Wales (CSEW, 2018) reported that 31% of individuals experiencing domestic abuse told someone in an official position, most frequently the police (17.3%) and health professionals (17.7%).

The reasons why cases go unreported can be personal (embarrassment, fear of retaliation, economic dependency) and/or societal (imbalanced power relations for men and women in society, privacy of the family, victim blaming attitudes). Hoyle and Sanders (2000) discuss how the 'private nature' and stigmatization of domestic abuse discourage reporting, through the victim's emotional and economic dependency on the perpetrator, isolation and lack of support networks and other measures of control. Gracia (2004) observes that stigmatization, including embarrassment, victim blaming and the perception of domestic abuse as a purely private issue, lead to significant under-reporting. Lack of awareness of domestic violence laws and available resources also correlates with a lower likelihood of reporting (Kim and Ferraresso 2021).

Another critical factor is that the tools of the criminal justice system can be ineffective in stopping the violence: economic sanctions are often counterproductive as the victim and offender share finances, and arresting the offender generally does not reduce violence or help prevent re-victimization (Davis and Smith 1995, Angrist 2006, Xie and Lynch 2016). Access to specialist resources and social support, however, do prevent re-victimization (Bybee and Sullivan 2005, Xie and Lynch 2016). Research suggests that reporting by the victim does more to reduce the probability of repeat victimization (Xie and Lynch 2016) through the benefit of being given more information and resources, rather than the benefit of the police arrest.

While there is little empirical academic literature focusing specifically on migrant survivors, there are several findings from the third sector worth highlighting. The Right to be Believed Report, undertaken by King's College London and the Latin American Women's Rights Service (McIlwaine et al 2019), was aimed at understanding the profile of women with insecure migrant status who have experienced Violence Against Women and Girls (VAWG) and who reside in London. It surveyed around 60 migrant women who had used services of

specialist migrant organisations. Migration status affected vulnerability, as 'almost two-thirds (62%) of women said their perpetrator had threatened deportation if they reported the violence, with more than half having been told by perpetrators that they would lose their visa if they reported it (54%)'. Even so, across this sample of women, only a fifth of women did not formally report the abuse. (Note that the sample was drawn from people who had received specialist support services, and so will disproportionately include those willing to discuss the abuse with external organisations.) Many of those who did not report cited fear of deportation and a lack of access to information as factors (18%). However, in this sample, 'more than two-thirds (68%) of women reported VAWG to the police with 39% being treated well but a quarter treated badly and a further 36% were neutral about their treatment.' For other types of reporting, 'women's organisations were the most important place to report VAWG after the police, with almost half of women (47%) turning to specialist women's organisations after they had reported to the police.'

'Forgotten Women: Domestic Violence, Poverty and South Asian Women with No Recourse to Public Funds' commissioned by Saheli in 2008 (Anitha et al 2008), focuses on the experiences of 30 South Asian women who had survived domestic violence and had NRPF status. They lived in the North West and Yorkshire regions and were interviewed between January and June 2007. All the women in this study who had NRPF and had left the abusive relationship were living in dire poverty and deprivation; 26 were either unemployed (20) or not permitted to work due to overstaying their visa (6). However, the likelihood of reporting in this sample was very high as almost all the women (28) 'had contacted an average of four services each to receive help about the domestic violence they had faced'. 73% said they had reported the abuse to police, often several times.

### *Sources of estimates of incidence and reporting*

Since we could not calculate the true rate of domestic abuse incidence among migrant categories eligible for the two scenarios, we estimated their likelihood of being a domestic abuse survivor and of reporting the abuse by looking at the most similar groups for which we did have data. The groups of 'most' similar individuals were defined as those of the same gender and age and similar employment status, as these characteristics are correlated with the likelihood of domestic abuse victimisation.

Two alternative data sources were used to produce separate estimates for the number of survivors of domestic abuse amongst the NRPF population, and the number that might be expected to report the abuse: incidence and reporting rates for domestic abuse derived from the Crime Survey for England and Wales as the main source for the estimates, and police recorded reporting rates as the additional source.

### *General patterns*

Several clear patterns emerged from our analysis of domestic abuse prevalence data:

- Women are on average twice as likely as men to experience domestic abuse
- For women, prevalence is highest among 16–24-year-olds (10-15%), and around 8% for 25-55 year olds. For those aged 56 and above it falls to 4%
- Individuals not born in the UK are less likely to say they have experienced domestic abuse (3.7% as compared to 5.9% for those born in the UK)
- Employment status is an important determinant of prevalence – 13.1% of unemployed women report experiencing DA, twice the rate for those in employment (7.3%)

- Prevalence by age and gender has not changed significantly over time
- Men are overall much less likely to report DA to the police (for White North Europeans the ratio of female to male victims is 3.5:1).

### *Central case estimates for the CBA – Crime Survey of England and Wales (CSEW)*

The first data source for calculating incidence and reporting of domestic abuse was the Crime Survey for England and Wales. The CSEW is a major sample survey that asks whether individuals have experienced crime in the preceding twelve months, and whether they reported it to the authorities. We used CSEW data to calculate incidence rates for domestic abuse for different subsets of the population, defined by the age and gender of the victim. These rates were applied to the relevant subsets of the mainstream and 10-year cohorts. As a robustness check, we have also conducted analysis using individual level responses from the Crime Survey of England and Wales to more precisely disaggregate the relationship between nationality and domestic abuse prevalence, as reported in Annex B.

The second step was to estimate how many of the victims with NRPf might go on to report the abuse. CSEW asks respondents who were victims of crime whether they reported it. According to that survey, the proportions of domestic abuse victims who reported the abuse to any authority (not just the police) were 26.1% for men and 33.4% for women. These rates were not segmented by age.

The resulting estimates<sup>16</sup>, shown in Table 5, feed into the CBA calculations of costs and gains. Based on CSEW data, some 32,000 victims with NRPf each year could be expected to approach the authorities, of whom about 7,700 would require refuge or accommodation. About three-quarters of the victims are female.

**Table 5 CSEW-based estimates for victims who would report to any authority including specialist services**

	<b>Female victims who would engage</b>	<b>Male victims who would engage</b>	<b>Total</b>	<b>Of whom require support/ accommodation</b>
Dependent visa (5yr)	139	34		
Family visa (5yr)	3,803	436		
Other visa (5yr)	447	209		
Work visa + BNOs (5yr)	2,672	2,071		
<b>Total main route</b>	<b>7,061</b>	<b>2,750</b>	<b>9,811</b>	<b>2,943</b>
Family visa (10yr)	1,775	619		
Other visa (10yr)	210	84		
<b>Total 10-year route</b>	<b>1,985</b>	<b>703</b>	<b>2,688</b>	<b>806</b>
<b>Undocumented</b>	<b>6,068</b>	<b>2,221</b>	<b>8,289</b>	<b>1,658</b>
Study	7,627	2,629		
Visitors	750	250		
<b>Total temporary</b>	<b>8,377</b>	<b>2,879</b>	<b>11,256</b>	<b>2,251</b>
<b>Overall totals</b>	<b>23,491</b>	<b>8,553</b>	<b>32,044</b>	<b>7,659</b>

### *Alternative approach to estimating incidence and reporting – police data*

Data Source 2 was aggregated police recorded data from an English police force. This source records whether survivors report their experience of domestic abuse to the police, in

<sup>16</sup> See Annex B for a fuller explanation of how the estimates were produced.

contrast to the CSEW which provides individuals' self-reported experience of crime irrespective of whether or not they go on to report it to the police. We considered it important also to model alternative numbers from this police source in this report as the proposed provision of new services does involve survivors taking active steps to engage with services. Based on police data, some 11,000 victims with NRPF could be expected to report to the police, of whom about 2,600 might require refuge or accommodation (Table 6).

**Table 6: Police data estimates for victims who would report to the police and engage with specialist services**

	<b>Would report to police: Female</b>	<b>Would report to police: Male</b>	<b>Total</b>	<b>Of whom require support/ accommodation</b>
Dependent visa (5yr)	52	7		
Family visa (5yr)	1,530	88		
Other visa (5yr)	174	43		
Work or BNO (5yr)	993	416		
<b>Total main route</b>	<b>2,749</b>	<b>554</b>	<b>3,303</b>	<b>991</b>
Family visa (10yr)	767	134		
Other visa (10yr)	82	17		
<b>Total 10-yr route</b>	<b>849</b>	<b>151</b>	<b>1,000</b>	<b>300</b>
<b>Undocumented</b>	<b>2,844</b>	<b>526</b>	<b>3,370</b>	<b>674</b>
Study	2,307	491		
Visitors	253	84		
<b>Total temporary</b>	<b>2,560</b>	<b>575</b>	<b>3,135</b>	<b>633</b>
<b>Overall totals</b>	<b>9,002</b>	<b>1,806</b>	<b>10,808</b>	<b>2,598</b>

The two data sources were relatively consistent in showing the number of female victims as higher than the number of males by a factor of about 3 or 4:1. As expected, the numbers based on police data were much lower than those from CSEW. Following consultation with the Commissioner, we based our central estimate on CSEW data but also report estimates based on police data in the final section of this report, alongside other sensitivity and alternative options modelling.

## 5 Social cost benefit analysis: estimating costs

As described earlier, our analysis covers two possible options for providing assistance to migrant victims of domestic abuse with NRPF, called Scenario 1 and Scenario 2. Table 7 summarises the assistance that would be available to cohorts with different migration status. (See Section 2 for more details about the scenarios.)

**Table 7: Categories of assistance available under Scenarios 1 and 2 by migration status**

	Scenario 1		Scenario 2	
	initial help + apply for DVILR	initial help only	initial help + apply for DVILR	initial help only
Mainstream routes	X		X	
10-year routes	X		X	
Undocumented	X		*	X
Visitors/students	*	X	*	X

\*in exceptional circumstances

This section addresses the likely costs of policy change; the benefits (gains<sup>17</sup>) are set out in the following section. In general, the costs are per victim household. There are two main elements of cost: provision of a special initial ASSP assistance fund (a one-off cost) and the ongoing payment of welfare benefits to households that secure DVILR and remain in the country.

The following discussion sets out how we have calculated expected costs, and the assumptions used, many of which also feed into the calculation of benefits. **Assumptions are designated in bold in the text.**

### *Approach to modelling costs*

We have modelled the costs of Scenarios 1 and 2 per survivor household, broken into two stages:

- the initial ASSP phase for the first period of assistance (lasting from one to six months--see below); and
- a later phase for those who are granted DVILR. For the purposes of the CBA model and costings we have called this subsequent period the 'extended support phase'. This refers to the costs (mainly to public funds) consequent on being granted DVILR. The length of the extended support phase varies depending on the migration status of the survivor; this is discussed below.

The basic form of the model is

$$(\text{Unit cost per household Year X}) \times (\text{Number of households supported Year X}) = \text{Total cost Year X}$$

<sup>17</sup> Although this is a cost-benefit analysis, we use the word 'gains' to avoid potential confusion (as government welfare benefits represent costs).

Projected future annual costs are discounted using the Green Book discount factor of 3.5%, and summed over a ten-year period.

*A note about welfare payments*

The main costs of extending access to public funds would be government payments of Universal Credit and child benefit. In social cost benefit analysis, such welfare payments are generally regarded as a transfer of resources from taxpayers to beneficiaries and can be shown as both costs (to society) and benefits (to recipients); at the level of society as a whole they cancel each other out. However in this case omitting the payments from the SCBA could be misleading, as it would imply that policy change would have little cost. We have therefore included only the social impacts of the welfare payments on the benefits side of the equation, not the payments themselves. We followed a similar approach in earlier research for the GLA (Benton et al 2022). On that occasion we consulted HM Treasury about our approach, and followed their advice.

The tables in Annex C set out the main variables used in the modelling and the sources of information for each.

*Numbers of victims who would seek help*

On the advice of the Domestic Abuse Commissioner we have based our central estimates on figures derived from the Crime Survey for England and Wales (CSEW). Alternative calculations based on police data are set out later in this report.

Column 2 of Table 8 sets out the baseline numbers for NRPF victims likely to engage with support services under Scenarios 1 or 2 (from Table 5, above). We estimated that **about 32,000 victims would report to an authority**. Not all of these would go on to seek help from specialist services; we estimated that **20 – 30% would do so or about 7,700**. For the initial analysis we have assumed that **100% of those who did seek help would go into a refuge or require funding for alternative accommodation e.g. provided by a local authority**. ONS statistics indicate that on average across England and Wales there are only 3-5 bed spaces per 1000 estimated female victims. Although capacity constraints may limit the numbers of NRPF victims who could enter a refuge, many or most of those who seek assistance will still require alternative accommodation of some sort.

**Table 8: CSEW-based estimates of numbers of victims who would report and seek help, by migration status**

<b>1</b>	<b>2 Numbers of victims who would engage with specialist services</b>	<b>3 Of which, would seek help from specialist services <u>and</u> <u>require accommodation</u></b>
On mainstream routes including BNOs	9,811	2,943
On 10-year routes	2,688	806
Irregular/undocumented	8,289	1,658
Visitors/students	11,256	2,251
<b>TOTALS</b>	<b>32,044</b>	<b>7,659</b>

## Business as usual (BAU)

Despite the implications of the term ‘No Recourse to Public Funds’, in fact the public sector does already undertake expenditure related to victims of DA with NRPF. These expenditures fall into three main categories, as set out in Table 9. The largest cost is borne by the NHS in treating the injuries and consequent medical problems of victims. This cost per victim was estimated by the Home Office as £1200 in 2017 prices (Table 10); updated to 2020/21 values it is £1347. This is an average cost across all victims; total business as usual (BAU) expenditure in the baseline year (Year 0) for victims of DA with NRPF is estimated at £7.3 million.

**Table 9: Annual business as usual public expenditure on victims of DA with NRPF**

	Number	% to which applied	Unit cost	Total cost in Year 0
<b>Health services</b> required as a result of victims' injuries	5,408	100%	£1,347	<b>£7,283,911</b>
<b>Police and criminal</b> legal costs	5,408	100%	£915	<b>£4,946,990</b>
Annual cost to <b>local authorities</b> of supporting victims with children under S17 of Children Act	1,947	20%	£10,185	<b>£3,965,307</b>
<b>Total</b>				<b>£16,196,208</b>

The second cost element is from police and criminal legal costs, again taken from Home Office research. The average cost per victim was £815 in 2017 prices, or £915 in current values. The total BAU expenditure in Year 0 is estimated at £4.9 million.

Finally, local authorities support some NRPF victims of DA with minor children through their duties under S17 of the Children Act. We heard from experts that not all survivors with NRPF manage to access local authority support, so based on this evidence have assumed that this expenditure is undertaken for 20% of NRPF victims with children. The total estimated BAU local-authority expenditure in this category is £4 million in Year 0.

**Table 10: Unit costs of domestic abuse in England & Wales for 2016/17**

Costs in Anticipation	Costs as a consequence				Costs in response				Total
	Physical and emotional harm	Lost output	Health services	Victim services	Police costs	Criminal legal	Civil legal	Other	
£5	£24,300	£7,245	£1,200	£370	£645	£170	£70	£5	£34,015

Source: Home Office 2019

## Overall numbers

If Scenario 1 were to be adopted, BAU costs would be reduced but not eliminated, as there would still be residual public-sector costs for administration, signposting and general support. We have conservatively estimated these as 10% of the existing expenditure.

Reduction in BAU costs would not be as marked if Scenario 2 were to be adopted. Most undocumented migrants would receive initial assistance, so BAU costs would fall in the first instance. However because they would not qualify for ongoing support, some could be



expected to re-present in subsequent years. We have therefore modelled a Year 0 reduction commensurate with that for Scenario 1, but then an increase in public-sector costs in following years.

### *Initial support*

Under both scenarios, migrant victims of DA are entitled to immediate support from a dedicated fund. This would cover the cost of accommodation and subsistence for victims and their children for an initial period (in the central case, we have modelled an **initial Access to Specialist Services Period (ASSP) of 6 months for regular migrants and undocumented/irregular migrants, and 1 month for visitors and students**). Because a high proportion of victims are in London, we assume that **the payment will be the equivalent of the median Universal Credit payment for that household type in London**, pro rata to the support period.

In addition, there will be a separate funding element to cover the specialist support services that would not be covered by Universal Credit. These include support groups, signposting to solicitors, counselling and advocacy/casework. The cost of these is an average, taken from recent Home Office research (unpublished). We estimate that **specialist support will cost £2,000 per victim helped**, based on that work and on figures provided by specialist services and other research in the sector.

The central estimate for the cost of initial support is **£42 million** for the first annual cohort. Note that this cost is the same under Scenarios 1 and 2; they differ in terms of the funding mechanism through which initial support is delivered, but not in terms of the amount.

**Table 11: Cost of initial ASSP support, Scenarios 1 and 2 (Y0, first annual cohort)**

UC equivalent during initial support period	£30,476,913
Additional amount for specialist services	£11,190,213
TOTAL	<b>£41,667,126</b>

### *Ongoing support*

Under both scenarios, migrant victims who successfully changed status to DVILR would be entitled to claim public funds; the main cost elements would be Universal Credit and child benefit. As for the initial support, because a high proportion of victims are in London, we assume that **the payment would be the equivalent of the average Universal Credit payment for that household type in London, for the median period of claiming UC**.

Under Scenario 1, survivors who successfully applied for ILR would receive some £30 million of public support in the first year after the initial ASSP period, most in the form of Universal Credit. The public sector would save some £16 million in the costs of business as usual, bringing the net cost to the public sector to £14 million in the first full year after the initial ASSP period.

Under Scenario 2 the cost for Universal Credit and child benefit in the first year after the ASSP period would be slightly lower than under Scenario 1. This would however be offset by expenditure by the health service, courts and police on unsuccessful ILR applicants who were victimised again and re-presented to services. The net cost to the public sector under Scenario 2 is estimated at £15 million in the first full year after the ASSP period.

**Table 12: Cost of ongoing support for migrants who are awarded ILR and those who re-present to services, Scenarios 1 and 2 (Year 1 cost, first yearly cohort)**

	Scenario 1	Scenario 2
Universal Credit	£26,042,742	£24,296,215
Child benefit	£2,796,790	£2,632,586
Residual admin and public sector costs	£1,619,621	£1,619,621
Additional costs for unsuccessful ILR applicants who re-present		£2,849,179
<b>GROSS TOTAL</b>	<b>£30,459,153</b>	<b>£31,397,601</b>
Business as usual (BAU) costs	(£16,196,208)	(£16,196,208)
<b>TOTAL COSTS NET OF BAU</b>	<b>£14,262,944</b>	<b>£15,201,393</b>

Under both scenarios, costs decline rapidly after the first two years for the initial cohort of victims assisted. This is for two main reasons: first, most regular migrants would eventually be eligible to apply for ILR, and the model only adduces costs (and benefits) for the 'extra' period afforded by an earlier-than-usual ILR process. Second, we assume that most survivors will remain on Universal Credit for a relatively short period of time.

**Table 13: Annual total costs less BAU (undiscounted), Years 1-10 (first yearly cohort)**

Year	Scenario 1	Scenario 2
1	£14,262,944	£15,201,393
2	£2,796,790	£3,344,881
3	£897,666	£911,536
4	£897,666	£777,981
5	£897,666	£744,592
6	£377,349	£215,927
7	£377,349	£213,840
8	£377,349	£213,319
9	£377,349	£213,188
10	£377,349	£213,156

### *Costs in Year 0*

Tables 14 and 15 set out the overall fiscal effects of the two scenarios on government expenditure in Year 0. For central government, the business as usual (BAU) costs for this group of victims and survivors total approximately £12 million per year. In the first year, Scenario 1 would involve c.£57 million in gross central-government costs, made up of initial ASSP support, ongoing benefit payments and administrative costs. Costs fall over time, as shown above; in addition they would be partially offset in later years by increased tax revenues from victims whose employment situation improved.

For Scenario 2 the costs are initially slightly lower at c.£56 million; again, these would be partly offset in future by higher revenues. Net of BAU costs, Scenario 1 would require c. £45 million in additional government expenditure in Year 0, while Scenario 2 would require net expenditure in Y0 of c.£44 million.

**Table 14: Fiscal effects of the two scenarios by expenditure category, Year 0: Central government**

<b>Business as usual: central govt</b>		
Costs to NHS	£7,284,000	
Costs to police/justice system	£4,947,000	
<b>Total BAU costs to central govt</b>	<b>£12,231,000</b>	
<b>Post-policy costs: central govt</b>	<b>Scenario 1</b>	<b>Scenario 2</b>
ASSP support	£41,667,000	£41,667,000
Universal credit	£13,021,000	£12,148,000
Child benefit	£1,398,000	£1,316,000
Residual public-sector and admin costs	£1,223,000	£1,223,000
Gross post-policy central govt costs	£57,309,000	£56,354,000
<b>Post-policy costs to central govt, net of BAU</b>	<b>£45,078,000</b>	<b>£44,123,000</b>

Local governments currently spend approximately £4 million under Section 17 of the Children Act to support NPRF victims of domestic abuse with children. Under Scenarios 1 and 2 they would see a net saving of about £3.5 million in Year 0 as expenditure shifted from local to central government.

**Table 15: Fiscal effects of the two scenarios by expenditure category, Year 0: Local government**

<b>Business as usual: Local government</b>	<b>Scenario 1</b>	<b>Scenario 2</b>
Annual cost of support under S17 Children Act	£3,965,000	
<b>Post-policy costs: local government</b>		
Residual public-sector and admin costs	£397,000	£397,000
<b>Post-policy savings to local government</b>	<b>£3,569,000</b>	<b>£3,569,000</b>

### *Costs for annual cohorts over ten years – NPV*

Per Green Book recommendations, we have modelled costs and benefits over ten years. The tables above provide costs for the first annual cohort of victims to benefit from the policy change. We assume that in future years similar numbers of victims would come forward, and that they would have similar attributes in terms of demographic characteristics and migration status.

Tables A15 and A19 in Annex C set out ten-year cost calculations for Scenarios 1 and 2. Over a decade, the net costs of implementing new policies under Scenario 1 would be about **£537 million** in present value terms. For Scenario 2 the net cost would be about **£323 million** in present value terms.

## 6 Estimating gains (benefits)

We identified four main areas of gain that could be expected from a change in policy that would extend support to migrant victims with NRPF. Most of the gains would accrue to survivors and their families, but some would benefit the public sector and wider society. The main categories of gain are:

- Physical and emotional harm prevented—a benefit to the victim
- Homelessness and destitution prevented—again, a benefit to the victim
- Improved employment prospects and work skills – a benefit to both victim and the public sector and wider economy
- Gains for children in households where there is domestic abuse

This section provides information about approaches to measuring costs of domestic abuse, and the potential gains in relation to domestic abuse services. It then sets out how additional problems faced by migrant survivors can influence the likely take up of services, and how potential gains are affected by the migrant status of the survivors, in the context of the two scenarios being evaluated. Note that gains are partly anticipated savings from future domestic abuse prevented, where the savings are for example to health service costs. There are also additional anticipated benefits to the public purse from activities like employment including taxation; and wider social gains from better physical health, mental health, and contribution to local communities. These gains are explained more in each section below.

### *Other research on the gains from reducing domestic abuse*

In preparing this report we have drawn on several published analyses of the costs of domestic abuse. Home Office (2019)<sup>18</sup> estimates the economic and social costs of domestic abuse, and summarises as follows:

*The average unit cost of a domestic abuse victim is calculated at £34,015<sup>19</sup>. The largest element of domestic abuse cost is the physical and emotional harm suffered by the victims themselves (£47 billion), accounting for 71% of all estimated costs of domestic abuse. The next highest cost is for lost output relating to time lost at work and reduced productivity afterwards (£14 billion).*

That report drew on a 2004 report by Sylvia Walby (updated in 2009) which comprehensively explored the relevant literature at that time and provided a detailed analysis of methodologies for estimating the impacts of domestic abuse<sup>20</sup>.

There is also a range of reports on impacts of services produced by or on behalf of providers of services to survivors such as for example NEF Consulting's (2016) report on the work of the domestic abuse support services organisation Refuge. This report, entitled *Refuge: A Social Return on Investment Evaluation*, concluded that

*The Social Return on Investment (SROI) for Refuge is calculated to be 4.94:1. This means that for every £1 invested, clients, their families and society-at-large reap a reward equivalent to £4.94.*

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<sup>18</sup> Home Office (2019) *The economic and social costs of domestic abuse* (Research report 107) HMSO London. [Available online.](#)

<sup>19</sup> All values expressed in 2020/21 prices

<sup>20</sup> This report is also cited as the basis for local government CBA of local initiatives in HM Treasury (2014) *Supporting public service transformation: cost benefit analysis guidance for local partnerships*. HM Treasury, with Public Service Transformation Network and New Economy. London (p46). [Available online.](#)

In a piece of work done for Women's Aid, a group of academics reviewed a programme of work which aimed to transform the lives of women and girls through systemic change to policy, practice and commissioning by promoting early intervention and reducing the prevalence, impact and tolerance of domestic violence and abuse (DVA). Their 2021 report<sup>21</sup> stated

*All Roadmap interventions were found to generate substantial SROI<sup>22</sup> values comparable to those reported for other DVA interventions.*

Six reports<sup>23</sup> on other interventions of various types also informed our estimates of monetisable gains. These evidence the direct costs to the public sector of insecure migration status, destitution, or homelessness (including health and mental health services, criminal justice services, and costs to social services and housing services). They also make reference to less direct and less easily monetisable impacts including human and emotional (or wellbeing) costs and impacts on children.

The methodologies used in the various studies vary according to the specific nature of the areas of social value policy being assessed, as do the sources of data about, and assumptions around, the numbers of people affected. There are also differences in the sources of monetised estimates for similar types of cost. Below we have set out the judgements we have made around the most appropriate study or studies to use for the specific situation of migrant survivors in this report and CBA.

Wider information about the nature, extent, and impact of domestic abuse in migrant households relevant to this CBA appears in several publications by the Safe Lives organisation. Information on the current work of agencies providing assistance to survivors of domestic abuse has also been commissioned by the Home Office.

### *Additional barriers faced by survivors who are migrants*

Extensive documentation sets out the barriers to any survivors of domestic abuse from coming forward to receive assistance and escape the situation they are in, as cited in the section above on estimating reporting behaviour. It is the nature of domestic abuse that the perpetrator will seek to coercively control their victim and prevent them from reporting or escaping the abuse through economic, emotional and physical control and threats, including of depriving the victim of access to children.

A wide-ranging review of the additional barriers to services providing support to migrants appears in Ravi Thiara's (2020) report *Safe and Secure: The No Recourse Fund*. The summary introduction of that report set out that

*The disproportionate impact of violence and abuse on migrant women resulting from their intersectional location amplifies both the ways in which violence is experienced and the barriers to accessing support and justice. Women with insecure immigration status and no recourse to public funds (NRPF) find that control of immigration status takes precedence over their rights as victims of violence against women and girls (VAWG), and statutory and other support services frequently fail to provide the type of help they require. Consequently, they are left with little choice than to either remain*

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<sup>21</sup> Roadmap Evaluation Team (2021) Roadmap Evaluation Final Report. [Available online](#).

<sup>22</sup> Social Return on Investment

<sup>23</sup> Nottingham Rights Lab's report (2019) on *The Modern Slavery (Victim Support) Bill – a cost benefit analysis*; Crisis' report (2016) on *Assessing the costs and benefits of Crisis' plan to end homelessness*; the HACT/Simetrica report (2015); the HACT value tables (2020) on the wellbeing value of improving housing security by tackling homelessness; the Social Integration Commission report (2018) on the cost benefits of integration and the JRF report on the costs and drivers of destitution (2016).

*trapped in abusive contexts or face the threat of destitution, detention and/or deportation and are exposed to further economic and sexual exploitation.*

That is to say, migrant women are very likely to have both worse outcomes from continuing domestic abuse and also have fewer effective routes to escape abuse and receive needed support.

These additional barriers have an impact on how we measure the likely gains from the proposed changes, in that they affect the likelihood of survivors coming forward for assistance, and the extent of the gains which might be realised. Note that some of these barriers apply only in some cases, and some migrants may in fact be entitled to work in the UK and be doing so. Nevertheless they affect many of the most excluded migrants. The barriers which are of particular relevance this CBA include:

- Uncertainty about their immigration status and rights. Victims may not be aware of what their immigration status is, perhaps because the perpetrator lies about their status or hides their documentation, and worry that they may be reported to the Home Office and either deported or have their children removed if they seek help. This is behind proposals by the Commissioner, the Justice Select Committee, His Majesty's Inspectorate of Constabulary and Fire & Rescue Services and some advice agencies to seek a 'firewall' to avoid information about individuals being passed between domestic abuse services and the Home Office.
- Linked to this may be the fear that if they are deported, or if they remain in the UK but separated from their partner, similar abuse may then continue within their wider family. They may fear, or have been made to believe, that would cause their family to lose status or income by seeking support to leave the situation of abuse. This may also be internalised as a sense of shame about their own position.
- Being unable to speak English adequately and because of this be unable to inform themselves about their rights, seek information online or in person, and successfully describe or present their case to those who could assist them.
- Facing public authorities at local and nation level who may quickly decide that they lack entitlement to any public assistance with services or other advice and support, and consequently refuse any applications made for support. Evidence shows that such snap judgements are often incorrect, and that many migrants are entitled to claim status and assistance.
- Being in a situation of social and emotional isolation within the household if they have no previous history of making friends (for example at school) or being part of any community in the UK. This can include being forbidden by the perpetrator to leave the house or make any such supportive contacts outside the home, and hence be totally confined and dependent on the perpetrator.
- Irrespective of the fear of information passing to the Home Office about their current situation, perhaps aware that they may at some point need to apply for Indefinite Leave to Remain and that decisions about that would be linked to the conditions of any original visa as a spouse or partner of a main applicant, or to the fact that they are undocumented or have irregular status.

These issues affect potential gains from policy changes in that there may be fewer survivors who are willing to engage with any new services made available. There are also specific issues about how their immigration status affects the gains which can be monetised and counted within the CBA.

### *The differences between the scenarios and how they could affect engagement*

The scenarios which this report has been asked to examine seek to provide immediate assistance to any migrant survivor irrespective of their actual immigration status or recourse to public funds. This principle of 'safety before status' takes account of the fact that survivors may need specialist and culturally specific assistance to establish their rights and access services, and appropriate personal and emotional support to go through this process. Both scenarios provide a period of initial ASSP support and immediate removal from danger while further steps can be taken to establish what rights the migrant survivor current has, and what options are available to move on after this initial period. In this respect the proposals are not dissimilar to the approach taken to victims of modern slavery under the 2016 Modern Slavery Act.

The scenarios differ in terms of the options for proceeding in the 'move on' period after initial support. Scenario one provides for stronger guarantees to survivors that they have the immediate right to apply for DDVC and DVILR in all cases, including those who are undocumented, present with valid visitors' visas, or students. Scenario two is more restrictive about the right to apply for indefinite leave to remain automatically, limiting it to those with regular, non-temporary visa status and those who can show exceptional reasons why this route should be made available.

We have read, and heard in interviews and from other evidence, that in fact there may be important links between the likelihood of survivors coming forward for support and the choice between the two scenarios.

First, the automatic right to apply for DDVC and DVILR in Scenario 1 may provide more assurance to survivors that there is less risk of deportation and less risk that their children may be taken from their care. There is a guaranteed route to a formal presentation of their case to remain. This may encourage more of them to seek assistance.

Second, the statutory basis of permitting automatic access to apply for DVILR may make it much clearer to local authorities and other public bodies that these survivors have a recognised right to services, and thereby speed up the provision of those services.

Third, unlike Scenario 1 one which gives statutory access to mainstream funding, Scenario 2 provides for a time limited fund to provide services. Such funding pots are normally subject to annual or triennial review and approval. There would be regular review points at which the funding and details of the scheme were subject to uncertainty and possible change. This could be another deterrent to coming forward.

Finally there are issues about the right to work, as opposed to access to public funds and permission to apply for DVILR. We presume that under Scenario 1 there would be a right to work granted where none was already available (e.g., for undocumented migrants) as soon as the survivor was accepted onto the programme, whereas with Scenario 2 this would not be the case (although it might be made the case in the detail of the policy).

### *Addressing uncertainty about how many will engage and the proportion of gain realised*

Two issues affect costs and gains. First, we have provided estimates of the numbers of survivors affected, and already allowed for the best estimates of who amongst those in need would come forward to engage with services. This is a new area of policy with a population of migrants with very different backgrounds and in different situations from UK citizens as a whole, so there must be some uncertainty about this.

Second, there is a similar uncertainty about the impact of services on survivors. Again we have drawn on the best research evidence around the costs of domestic abuse and the gains from reducing it. Some of this evidence comes specifically from benefit analysis of migrant domestic abuse services – and the Home Office’s Supporting Migrant Survivors is providing additional evidence around this. In the CBA we have used monetary values for gains which have been drawn from a wider UK or English population. There is uncertainty about how this might apply to the migrant population. In fact given that these migrant survivors may have suffered more harm for longer – as noted above – it may be that they would benefit to a larger degree than the wider UK population and hence gain more. Alternatively they might not gain as much because of continued concerns about coming forward.

Because of the interaction between the different elements of the proposed programme of changes this is best done as an adjustment in terms of the likely range of effectiveness of the programme as a whole. This is done at the end of the process as an exercise in assessing the ranges and optimum bias of the central model. To do this we have varied both the take up/engagement rates, and also the extent of realisation of the gains.

We should also note that in relation to the overall cost benefit ratios, as set out above there are already several independent evaluation studies of the impact of services to survivors of domestic abuse in the general population that have shown high social return on investment (SROI) ratios, so even with these variations we could expect to have a positive ratio.

#### *Impact of expected length of stay in UK on gains which can be counted*

The HM Treasury Green Book recommends that costs and benefits should be calculated for ‘over the lifetime of the proposal’<sup>24</sup>. Estimating gains for non-migrants is done on the basis that they and any children in the household will be resident in the UK for an indefinite number of years (the ‘lifetime’), during which they will be both consumers of public services and contributors to paying the costs of public services through taxation and wider contributions to local communities.

For example, costs savings to the NHS from reducing the risk and costs of future incidents of domestic abuse can be assumed to be likely over the ten-year period of the analysis, and longer-term benefits from better child development can be relevant to the overall gains to society. Similarly UK domestic abuse survivors can all be assumed to have the right to work and hence contribute to taxation income throughout the entire period of support.

This situation is more complicated for migrants. The length of the ‘lifetime’ must be considered for each of the scenarios under consideration. Each scenario envisages an initial ASSP period during which any survivor, irrespective of immigration status, can receive support. Each also envisages that some of those survivors may not be successful in any application of ILR under the DVILR or another visa or special route to ILR. The remainder of the survivors will either be able to apply under other schemes (for example continuing on the five-year scheme) or may be subject to deportation if they remain undocumented migrants. It is also reflected in the main Home Office (2019) figures which note (p23) that the

*...the assumption [is] that there is an even distribution of harms through the...three-year average abuse period.*

To address this point we have assumed that we should not count gains which would accrue to migrant survivors once they have left the UK. It may well be, and it is to be hoped, that the support given to them would have a lasting positive impact on their lives, and the lives of

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<sup>24</sup> HM Treasury (2022) The Green Book. Central Government guidance on appraisal and evaluation. [Available online.](#)



their children, whether they were in the UK or not. But for the purposes of this CBA we have taken steps to adjust the monetizable gains so that only those realised by migrants residing in the UK are counted. Under each scenario, some of the estimated gains can reasonably be expected to arise in the initial period when the survivors are living and being supported in the UK—whatever their later residence status. Longer-term gains, including gains from employment, are adduced only for those migrant survivors who are awarded ILR. Regardless of expected duration, gains are expressed in present-value terms and accounted for in Year 0 in the central case, although we also do an alternative model of extending some of the gains over later years.

### *Individual gains areas*

This section outlines how estimates of the likely number of beneficiaries have been estimated for each type of gain, and the basis for monetising the value of each type of gain<sup>25</sup>. It also takes account of the points above about expected periods of residence in the UK.

The approach to ‘gains’ in relation to abuse are based on the idea that early intervention will reduce the impact and costs of the abuse. The costs of abuse are linked to the fact that, as set out in Home Office (2019)<sup>26</sup>:

*The main element of this cost is the physical and emotional harms borne by the victims themselves following their often prolonged and repeated period of abuse*

Intervening promptly will reduce these costs. Society at large will benefit from savings to the public purse, and survivors and their children (if any) will enjoy increases in wellbeing and make greater contributions to society. These effects are reflected in measures of social return on investment, and also in improvements in quality of life years (QALYs). Reductions in the costs of DA as identified by the Home Office are adduced as gains from policy change.

In relation to the later years, which are important for the overall ten-year calculations required by the Green Book, we have separated out gains which rely on the assumption of continued residence in the UK by identifying those which would accrue only after the granting of ILR. This applies to employment gains, some elements of housing gains, community gains and gains for families with children.

### *Physical and emotional harms*

In this section we focus on physical and emotional harm caused by abuse.

The physical and emotional unit costs for harms that domestic abuse victims suffer have been taken from Home Office (2019). The unit cost for physical and emotional harm, including from homicides, was estimated at £24,300 or £27,285 at 2020-21 prices (see Table 10, above). This figure was arrived at in the following way (at p10 of the report):

*The QALY method is used to quantify these costs. The same approach was used in ‘The Economic and Social Costs of Crime’ (Heeks et al., 2018) and ‘The Economic and Social Costs of Modern Slavery’ (Reed et al., 2018), based on the work of Dolan et al. (2005). This approach uses the percentage by which the victims’ health-related quality of life is estimated to be reduced (the QALY loss) by suffering particular*

<sup>25</sup> The underlying evidential and research bases of the unit cost figures are set out in the ‘Gains values’ sheets in the more detailed Excel workbook published alongside this report.

<sup>26</sup> Home Office (2019) *The economic and social costs of domestic abuse* Research Report 107. Home Office, London

*injuries and psychological harms. The QALY method is outlined within 'The Green Book: appraisal and evaluation in central government' (HM Treasury, 2018a).*

*The physical and emotional harm to the victims is calculated as the likelihood of sustaining physical and emotional injuries (LIKE), multiplied by the percentage reduction in health-related quality of life (REDUCEQL), multiplied by the duration of the recovery period (including the length of abuse where appropriate) as a fraction of a total year (DUR). This is then multiplied by the value of a year of life at full health (VOLY) to give an estimate of the average cost.*

The same publication contains a figure for health service (main public sector) costs of £1,200, (£1,347 at 20-21 prices), calculated as follows (at HO 2019 p12):

*The estimates of health service costs are based on the treatment that is likely to be required for certain injuries and the prevalence of injuries for violent and sexual incidents (estimated using the CSEW).*

The 'abuse period' over which the costs occur is assumed in the Home Office report (p5) to be three years.

In light of variations in migrants' expected future period of residence in the UK, we applied the Home Office figures differently to different groups. Many in the **main visa group** are on routes which would lead to long term residence, and some 76% are eventually granted ILR (after accounting for those who leave before getting to the point of applying for ILR, as set out earlier). To maintain a conservative approach to gains, we allocated half the gains for physical and emotional costs foregone to all survivors who seek help, rather than the full amount. The remaining half was allocated only to those eventually awarded DVILR, on the assumption that the intensive six-month initial ASSP support period would likely mitigate the risk of a continuing cycle of abuse. We also modelled the alternative approach of allocating 100% of physical and emotional gains to all survivors, but it made little difference to the CBA outcomes.

In relation to **undocumented migrants**, there is little evidence about how long they have been in the UK, or what their experiences were prior to or during that time. Many will have experienced traumatic journeys as part of their arrival as undocumented migrants and a proportion – possibly a significant proportion – of the emotional and physical harm they have experienced may be related to this rather than or in addition to domestic abuse. We have therefore attributed 25% of the Home Office figures for physical and emotional harms foregone for the initial period, but allowed gains equivalent to the main group for those awarded ILR. The additional gains can be expected to accrue in this later period of UK residence.

In relation to **visitors and students** we assume that benefits will be lower, as their stay in the UK is shorter. Visitors will have had little or no experience of life in the UK and persistent periods of domestic abuse will have been mainly in their home countries, even though a specific incident in the UK may trigger the use of services. Similar reasoning applies to students. Both groups are likely to experience significant immediate gains from the use of emergency services, but most can be expected to return to their homes after intervention. In the model we therefore allocate gains to them for only a limited period. For the small proportion awarded ILR due to exceptional circumstances, the remaining full gains are allocated due to the new expectation that they will remain UK residents indefinitely.

In the case of the health service costs, we have assumed that these are consequent on actual incidences of demands on health services and have counted them equally in all cases as direct public services savings.

The figures used in the CBA are as follows:

**Table 16: Value of gains from physical and emotional harm prevented, by migration status (both scenarios)**

Migration status	Unit gain from emergency support (£)	Additional unit gain for those awarded ILR (£)
Regular status	13,643	13,643
Undocumented	3,411	23,874
Visitor/student	1,364	25,921

### Housing and homelessness

A major barrier to victims' safety is the risk of homelessness or rough sleeping – the latter particularly for single victims including male survivors. Access to emergency shelter and subsequently to long-term homes is the second main area where survivors will benefit.

There is considerable literature around the benefits of preventing homelessness and rough sleeping. PWC's 2018 report for Crisis<sup>27</sup> identifies the main ones as

- avoiding the use of local authority homelessness services (although this report recognises the use of temporary accommodation as necessary and unavoidable)
- reduced use of public services such as NHS, mental health, or drug and alcohol services. This aspect of gains has already been counted in the physical and emotional harms section above
- increased economic output (dealt with in the section below)
- increased wellbeing as a result of moving to appropriate temporary housing or from temporary housing to permanent housing.

Their report estimates the benefit-cost ratio (BCR) of providing alternative safe and more secure housing, health and mental health support, and direct, effective assistance in dealing with public authorities:

*Overall, we estimate that the discounted total cost of the low to medium support solution<sup>28</sup>.... is £683m between 2018 and 2041. We also estimate that, over the same period, this solution will deliver discounted benefits of £1,978m. This means that, for every £1 invested in this solution, £2.9 would be generated in benefits.*

Their 2.9:1 BCR is estimated over a longer period than the 10 years used in our report.

The main housing-related gain included in our model is that of moving from temporary to permanent housing. This is quite different from avoiding homelessness and rough sleeping, and happens over a longer timescale. Moving to settled housing allows the survivor to begin a process of integration into a local community and benefit from greater security, stability and confidence.

<sup>27</sup> PWC/Crisis (2018) *Assessing the costs and benefits of Crisis' plan to end homelessness* Crisis, London. [Available online.](#)

<sup>28</sup> This refers to the group most similar to the migrant group in this study, so for example not including actual rough sleepers

For the value of this gain we have relied on work done by Daniel Fujiwara for the Housing Association Charitable Trust (HACT) to monetise various housing related benefits. The wellbeing values of moving from temporary to secure long-term housing are £8,036 and £8,019 for households with and without children, respectively. Because this is a long-term gain we have modelled it only for those granted DVILR.

**Table 17: Value of gains from moving to settled housing, by household type (both scenarios)**

Household type	Unit gain for those awarded ILR (£)
Households with children	8,036
Childless households	8,019

### *Employment and skills*

Home Office (2019) sets out two types of cost related to employment: as a result of domestic abuse, many survivors take time off work, and they may be less productive following their return. Per victim, the cost of these two effects was estimated at £7,245. However, the situation for some migrants will be different from the main UK population<sup>29</sup>.

Both Universal Credit (post-ILR) and specialist support for DA victims offer survivors help with building an economically independent future for themselves, through referrals to training and job search agencies. Our calculation of gains related to employment is restricted to those survivors awarded DVILR, as during the initial ASSP period the main focus of specialist services will be on establishing basic rights to which survivors are entitled, providing health and counselling support, re-establishing their social relations with others and rebuilding self-esteem and self-confidence.

The following figures and assumptions feed into our gains estimates around employment:

- Latest ONS data<sup>30</sup> indicates 67.3 % of lone parents with children in the UK work, and 70.0% of women without children
- Cost benefit work carried out by the Social Integration Commission (2016)<sup>31</sup> indicates that social integration increased the chances of finding employment by 13%.
- Evidence from the Women's Aid Federation suggests that after assistance from their services between April 2021 – April 2022, 66% of survivors obtained employment

We also know that survivors in the main visa groups will have been working before engaging with the programme. Giving them access to services can enable them more quickly to return to work.

Taking all these factors into account we have conservatively estimated that in the population awarded DVILR, **40% of survivors with children would enter or re-enter part time employment**, and **50% of those without children would enter full time employment**. The gains are allocated from Year 2 only, and only for those survivors who receive DVILR status giving them the right to remain in the UK, to work and to receive public funds.

<sup>29</sup> See for example the Nottingham Rights Lab report on employment opportunities for victims of modern slavery exiting the National Referral Mechanism: they valued the unit gain from acquiring a job at £26,104.

<sup>30</sup> Office of National Statistics (2022) Working and workless households in the UK: January to March 2022. [Available online](#).

<sup>31</sup> For background and links to the three reports from this commission on the benefits of integration of migrants and other ethnic minority citizens see <https://www.belongnetwork.co.uk/resources/social-integration-commission/>

Although the Home Office research did provide an estimate of the value of employment gains in terms of costs foregone, we have calculated our own figures based on somewhat different assumptions to reflect the specific population in question. Using current hourly wage rates for full and part time work (for households without or with children, respectively), and data on the average number of hours worked in full and part time jobs, we estimated resulting annual incomes. From this we deducted the amount of Universal Credit (or equivalent payment) the newly employed would lose. This differs considerably for people with or without children, and people with children get an additional allowance before the 55% deduction applies. We also calculated the tax, NI, and other taxes that the newly employed would pay on this income, which would flow to the public sector. More details can be found in the 'employment gains' tab of the accompanying spreadsheet. The resulting figures used in the CBA are as follows:

**Table 18: Value of gains from improved employment and skills, by household type (both scenarios)**

Household type	Unit gain for those awarded ILR (£)
Childless households	8,161
Households with children	6,062

### *Children's gains*

An important category of gain is to children in households where abuse is experienced. The main benefit is that they would no longer be exposed to abuse in the household. There is considerable evidence of the negative impact on children of such exposure, which is reviewed in an annex<sup>32</sup> to Home Office (2019). That concludes that

*There is some evidence of this witnessing having immediate and future harms to a child's mental (and possibly physical) health, their future relationships, and links to increases in bullying, and poorer academic and economic outcomes*

Witnessing domestic abuse may increase the chances of the child perpetrating such abuse as an adult, continuing a cycle. Other impacts include educational underachievement, lower incomes and worse housing conditions in later life. These costs were not monetised in the Home Office 2019 study, as children exposed to domestic abuse sometimes live in households where they are also subject to direct child abuse and it is difficult to separate the effects. In addition, there are few longitudinal studies of the issue, so while there is clear evidence of negative impacts on children from domestic abuse, there are technical difficulties in quantifying and monetising them.

Other evidence<sup>33</sup> on the impact of domestic abuse of children supports the notion that the effects on children's mental health can be severe and long-lasting.

These impacts are so important that and clearly evidenced that they should be reflected in the gains. Whether the gains are attributable to cessation of exposure specifically to domestic abuse, or to cessation of other abuse within the family, is less of an issue where the survivor and the children are being removed from the family situation altogether, reducing the risks and generating the gains flagged in the literature.

<sup>32</sup> 'The impacts on children from witnessing domestic abuse'

<sup>33</sup> See for example Callaghan, J. E. M., Alexander, J. H., Sixsmith, J. and Fellin, L. 2015. *Beyond 'Witnessing': Children's Experiences of Coercive Control in Domestic Violence and Abuse*. Journal of Interpersonal Violence. 33 (10); Stephanie Holt, Helen Buckley, Sadhbh Whelana (2008) *The impact of exposure to domestic violence on children and young people: A review of the literature* Child Abuse & Neglect 32 (2008)

To approximate the wider benefits of preventing emotional and social harm for young people of all ages, we applied a figure of £9,283 from the HACT social impact tables, which monetises the one-off lifetime gains for a young person of improvements in confidence. This amount was allocated to each child in a victim household with children (average 1.83 children/household in those households with children).

Not all analysts agree that gains to children can be monetised: HO 2019 has an extended section which concludes that these should be part of unmonetizable gains. We therefore also modelled gains without this element (see final section of this report).

The second major gain to children from giving NRPF victims access to public funds would be from the effects of child benefit. Evidence shows that children in low-income families have better long-term outcomes if they receive additional income from welfare benefits in the child's early years. A major systematic review of the impact of additional income on children's outcomes was published in 2013 and updated in 2017 and 2021.<sup>34</sup> The studies reported look at the impact on children's outcomes of systematically increasing household cash income. Impacts were seen at different ages, and covered a range of outcomes for children, including cognitive development and social and behavioural outcomes. One key gain was cognitive development improvement in early years (pre-school). These gains were seen even where short periods of poverty in the child's early years were followed by later increases in family incomes.

Many of the gains related to additional household income are evident only in the long term, because children will get better jobs and enjoy better wellbeing as adults. We have included these gains only in Year 0, so to that extent the gains set out in our model are an underestimate because they do not include continuing longer-term gains.

Our analysis uses a figure of £1,671 for gains to children from the household receiving child benefit, which is taken from Garfinkel et al (2021)<sup>35</sup>. The gain is applied only for those households with children where the victim attains ILR. The figures used in the CBA are as follows:

**Table 19: Value of gains to children, for households with children (both scenarios)**

Origin of gain	Unit gain for those awarded ILR (£)
Removal of child(ren) from environment of domestic abuse	9,283
Wellbeing gain to child(ren) from receipt of child benefit	1,671

<sup>34</sup>Cooper, K., Stewart, K. Does Household Income Affect Children's Outcomes? A Systematic Review of the Evidence. Child Ind Res 14, 981–1005 (2021).pdf

<sup>35</sup> Garfinkel, I., Sariscsany, L., Ananat, E., Collyer, S., & Wimer, C. (2021). The costs and benefits of a child allowance. CPSP Discussion Paper. Poverty & Social Policy Brief Vol. 5 No. 3 March 08, 2021

For Scenario 1, the gains are summarised below by category. The present value of gains over the SCBA period would be about **£246 million**, with physical and emotional harm prevented accounting for the largest amount (about 43%).

**Table 20: Scenario 1: Present values of gains by victim migration status and category of gain. Y0 cohort over SCBA period (10 years)**

Migration status	Physical and emotional harm prevented	Homelessness and destitution prevented	Children's gains	Employment and skills	Total	Of which public sector gains
Regular	£90,033,453	£22,869,802	£19,142,523			
Undocumented	£15,548,869	£3,326,011	£2,783,944			
Visitors & students	£1,120,988	£173,374	£151,218			
Totals	£106,703,310	£26,369,187	£22,077,684	£91,014,626	<b>£246,164,807</b>	£20,050,010

For Scenario 2, the gains are summarised below. The present value of gains over the SCBA period would be slightly lower than for Scenario 1, at **£226 million**.

**Table 21: Scenario 2: Present values of gains by victim migration status and category of gain. Y0 cohort over SCBA period (10 years)**

Migration status	Physical and emotional harm prevented	Homelessness and destitution prevented	Children's gains	Employment and skills	Total	Of which public sector gains
Regular	£90,033,453	£22,869,802	£19,142,523			
Undocumented	£9,612,028	£1,330,404	£1,113,577			
Visitors & students	£1,120,988	£173,374	£151,218			
Totals	£100,766,469	£24,373,581	£20,407,318	£80,711,788	<b>£226,259,156</b>	£17,780,353

## 7 Conclusions and sensitivity analysis

### *CBA summary: central estimates*

The Green Book recommends modelling over ten years. We did this in three stages: first, we estimated costs for the first year, which consisted of both initial ASSP assistance and longer-term help for some migrants. Second, we modelled costs and gains for ten years for the first cohort of victims, and finally, on the assumption that similar numbers would come forward each year, we modelled costs and gains over a ten-year period for all annual cohorts. Annex C provides details.

Table 22 summarises our central estimates of costs and gains (benefits) over ten years for the **first annual cohort of victims**. Costs vary only slightly between the two scenarios, with each costing around £61.5 million in present value terms. Gains are higher under Scenario 1 (£246 million) than scenario 2 (£226 million). The BCR over ten years for the first annual cohort is 4.0 for Scenario 1, and 3.7 for Scenario 2.

**Table 22: 10 Year CBA: first cohort of victims**

	Scenario 1	Scenario 2
10-year PV of net costs for Y0 cohort	<b>£61,683,989</b>	<b>£61,305,066</b>
<b>Gains: Y0 cohort, 10-year PVs</b>		
Physical & emotional harm prevented	£106,703,310	£100,766,469
Homelessness & destitution prevented	£26,369,187	£24,373,581
Employment & skills, including higher tax revenues	£91,014,626	£80,711,788
Children's gains	£22,077,684	£20,407,318
Total of PVs of gains: Y0 cohort	<b>£246,164,807</b>	<b>£226,259,156</b>
<b>Benefit-cost ratio (BCR), 10 years, Y0 cohort</b>	<b>4.0</b>	<b>3.7</b>

Assuming a similar number of victims would present in each year, we calculated costs and gains for **ten annual cohorts of victims** (Table 23). Over ten years, for all cohorts, again the costs would differ little between Scenarios 1 and 2, with present-value totals of both coming in at around £537 million. The present values of gains would exceed £2 billion in both scenarios. Gains are higher under Scenario 1 (£2.3 billion) than Scenario 2 (£2.1 billion). The BCR over ten years for ten annual cohorts is higher for Scenario 1 (4.3) than Scenario 2 (3.9).

**Table 23: 10-year CBA: ten annual cohorts**

	Scenario 1	Scenario 2
Sum of PVs of costs: 10 annual cohorts	£536,826,358	£536,719,998
Sum of PVs of gains: 10 annual cohorts	£2,293,420,355	£2,107,967,253
<b>Benefit-cost ratio (BCR) 10 years, 10 annual cohorts</b>	<b>4.3</b>	<b>3.9</b>



### Modelling alternative scenarios

For our sensitivity analysis we have modelled some specific different scenarios to test the sensitivity of the model. The **baseline** model is:

**Table 24: Baseline model**

Scenario 1				Scenario 2			
BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts	BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts
4.0	£61,684,000	4.3	£536,826,000	3.7	£61,305,000	3.9	£536,720,000

The base numbers are uncertain. What if in fact they were much lower, despite our best efforts to estimate their likely size? In addition, the provision of services requires that either refuge accommodation or other forms of temporary accommodation be provided, and that there are enough service providers to undertake the community-based support work envisaged in the scenarios. For these reasons we modelled the outcome as if the numbers in each of the NRPF groups above were 70% less (Table 25).

**Table 25: 70% fewer people**

Scenario 1				Scenario 2			
BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts	BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts
4.0	£18,505,000	4.3	£161,048,000	3.7	£18,392,000	3.9	£161,016,000

The ratios would remain the same as with the central estimate but the costs reduce considerably. This suggests that the main impact of lower numbers would be to reduce cost, but without changing the gains made per unit of cost -- which is to be expected.

Another way of looking at a reduction in numbers of victims is to use estimates based on police data. As set out in Chapter 3 above, these estimates are significantly lower than those based on CSEW. It may be considered that such estimates would more accurately indicate how many survivors would actually approach public or other services. Again this has a large impact on the outcomes, particularly in terms of reducing costs, though the ration of cost to benefit is not changed. This model shows:

**Table 26: Use police prevalence data**

Scenario 1				Scenario 2			
BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts	BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts
4.0	£21,786,000	4.3	£189,077,000	3.6	£21,761,000	3.9	£190,093,000

We also considered sensitivities around the period spent in the Access to Specialist Services Phase (ASSP), reducing it from 6 months to 3 months. This produces a modest reduction in costs and a modest increase in the BCR ratios. This might be surprising, but is in fact linked to the assumed total period on Universal Credit which is one of the main drivers considered next.

**Table 27: Reduce ASSP period to 3 months**

Scenario 1				Scenario 2			
BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts	BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts
4.4	£54,644,000	4.7	£471,239,000	4.2	£53,788,000	4.5	£466,682,000

Universal Credit is expected to continue for people granted DVILR for in total 1.5 years irrespective of the time in the ASSP support phase. If we keep the ASSP at 6 months but assume only 3 additional months of Universal Credit for DVILR cases (so 9 months in total) the outcome is:

**Table 28: Reduce total time on Universal Credit to 9 months total, for DVILR cases**

Scenario 1				Scenario 2			
BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts	BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts
5.5	£50,606,000	5.8	£44,692,000	4.5	£51,914,000	4.5	£458,619,000

This provides a marked increase in the CBA ratio and reduction in costs, as would be expected, although the cost reductions are modest. Note that while we can model shorter average periods on Universal Credit period after the granting of DVILR, we are not assuming a fixed time limit. That is, survivors with recourse to public funds who met the usual requirements in relation to training, job search, etc. would be entitled to UC and the full range of benefits linked to the provision of childcare.

We can also model outcomes if fewer of the survivors in the main group were to be awarded DVILR. The central case assumption is that 76% attain ILR; we have modelled a reduction to 40%.

**Table 29: Reduce award of DVILR from 76% to 40% for main group**

Scenario 1				Scenario 2			
BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts	BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts
4.1	£42,643,000	4.3	£375,378,000	3.6	£42,264,000	3.8	£375,272,000

This reduces the costs, mainly as fewer continue to receive Universal Credit due to the failure to secure DVILR rights to public funds. The CBA ratios remain similar.

Further sensitivity testing was undertaken in relation to rates of UC or other payments towards basic income. We have modelled using the maxima for Universal Credit (benefit cap rates) rather than the London median which was used in the central case. It may be felt that payments are likely to be higher because of the housing costs of refuge or temporary accommodation. The outcomes using the £23,000 benefit cap level for a single person or couple with children and the £15,410 cap for a single person are:

**Table 30: Use UC benefit cap rates and not London median**

Scenario 1				Scenario 2			
BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts	BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts
2.0	£111,200,000	2.1	£980,002,000	1.9	£108,974,000	2.0	£963,907,000

This increases costs and reduces the BCR ratios, although they are still well over 1:1.

Rather than paying survivors Universal Credit, we looked instead at paying them the amount provided to asylum seekers under S98 of the Immigration and Asylum Act 1999. This is £40.85 per person per week. We calculated an annual amount for survivors of abuse, assuming that households with children have on average 1.83 children. The S98-based payments would be £3,378 less per annum than Universal Credit for a couple or single person with children, and £1,845 less for a single person with no children. We did the calculation in this way as asylum seekers are provided with housing whereas this would not be the case under the Commissioner's scheme, so the UC element for housing benefit would still be a cost for survivors of abuse.

**Table 31: Replace UC rates for basic income with asylum seeker rates (S98)**

Scenario 1				Scenario 2			
BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts	BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts
5.5	£46,071,000	5.9	£397,089,000	5.0	£46,274,000	5.4	£402,024,000

This option would reduce costs and increase BCRs under both scenarios. Note that we modelled changes in cost only, but such a sharp reduction in payments to survivors would also affect gains. Modelling the reduction in gains is more complex than modelling cost reductions and was beyond the scope of this research, but BCRs would in fact be lower (probably significantly lower) than Table 31 indicates.

A further iteration brings several of these options together by using a three-month ASSP period, police data on numbers likely to present (which is a reflection of more likely sector capacity) and three months Universal Credit after the granting of DVILR.

**Table 32: Use police prevalence data, limit ASSP to 3 months, further 3 months UC for DVILR cases**

Scenario 1				Scenario 2			
BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts	BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts
6.1	£15,414,000	6.6	£133,447,000	4.9	£15,862,000	5.3	£138,205,000

This also yields increased BCR ratios (though in fact these will be overstated for the reasons set out above) and a significant reduction in costs.

Finally, in the gains section we flagged that Home Office (2019) has an extended section which concludes that gains for children living in households with domestic abuse are unmonetizable. We therefore excluded them from the gains. The outcome is below and shows a modest reduction in the CBA ratio:

**Table 33: Exclude gains for children who no longer witness domestic abuse**

Scenario 1				Scenario 2			
BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts	BCR Y0	10-yr cost 1 <sup>st</sup> cohort	BCR 10 yrs	10-yr cost all cohorts
3.7	£61,684,000	3.9	£536,826,000	3.4	£61,305,000	3.6	£536,720,000

## *Conclusions around sensitivity and uncertainty analysis*

This analysis has highlighted that:

- There is considerable uncertainty about how many migrants there are, how many may be survivors of domestic abuse, how many may engage with any new services provided, and the capacity of services for survivors to gear up to deliver new services. The BCRs are not particularly sensitive to how many engage, although the costs do depend strongly on volume.
- A key driver of overall costs, and also of BCRs, is the amount of basic income paid to survivors and for what period. Reducing the period of intensive support (ASSP period) makes modest savings to overall costs. Greater cost savings and better BCRs appear to be generated by reducing the period during which survivors who are awarded DVILR are assumed to remain on Universal Credit—but note that we did not model concomitant reductions in gains.
- Similarly, if the amount of Universal Credit in payment is set at the maximum (benefit cap level) and not the central case rate of the median London UC payment, the costs considerably increase, and the BCRs reduce sharply.
- In contrast assuming basic income was paid at a rate similar to that paid to asylum seekers, but still allowing for the need to provide funding for accommodation in refuges or other temporary or permanent accommodation, there is a 25% reduction in overall 10-year NPV costs and a marked increase in BCR ratios. Again the caveat applies that we have not modelled reductions in gains, which would be likely to be significant in this case.
- Under all individual variations of the model there remained a positive BCR ratio.
- Modelling a combined range of reduced numbers, shorter periods in ASSP support and shorter overall periods of UC provision shows a significant increase in BCR ratios and a 75% reduction in overall 10-year NPV costs. Because support would be provided for a shorter period the associated gains might be smaller, but we have not modelled that.

## **Annex A: Estimating the migrant adult population with NRPF: mainstream and ten-year routes**

The following sets out in detail how we have estimated the migrant adult population with NRPF on mainstream visas and on the ten-year route, based on published statistics, Freedom of Information Requests, and our own calculations. We take the various main types of visa and migration status in turn.

### **1. Data sources on people entering in mainstream visa categories**

Data about the immigration status of the population with non-EEA citizenship in the UK comes from the Home Office Immigration Statistics. The most comprehensive publicly available data source based on these statistics are the Migrant Journey reports (formerly known as the 'Statistics on changes in migrants' visa and leave status' report), which tracks people's legal status within the UK immigration system across time. For example, Migrant Journey data provide information on the number of people granted visas outside the UK, grants of extensions to stay, grants of settlement, and grants of citizenship. The publicly available dataset includes breakdowns by year, type of entry visa, current visa, nationality, and type of applicant (main vs dependent) since 2004. However, breakdowns by age and sex are still limited and more detailed breakdowns need to be obtained via Freedom of Information Requests. From 2021 onwards, MJ data will also include non-EEA migrants, who have been subject to immigration control since 1 January 2021. This report relies on MJ data from 2020, the latest available data at the time the analysis was conducted.

### **2. Mainstream immigration categories: work, family and study**

People moving to the UK on family visas will be eligible for ILR after five years of continuous residence (i.e., five-year routes to settlement). This is also the case for many work-visa holders, although some work visas are strictly temporary (e.g. they expire after a given period and cannot be renewed, as in the case of the Youth Mobility Scheme), or they do not lead directly to settlement and holders must switch to another category first (as in the case of Intracompany Transfers). Student visas do not provide a direct path to settlement. This means that migrants on student visas will need to switch to a different visa category (long-term work or family) and stay on those visas for five years before applying to ILR.

Visa duration and routes to settlement thus affect the number of people in the country at any one time with NRPF, as well as the expected duration of their stay. In addition, not everyone stays for the full duration that is permitted, as some choose to return home.

To analyse the duration of residence for non-EU citizen visa holders, we use data on the status of visa holders in the years after their initial visa grant (Home Office 'Migrant Journey' data). These data only include people who were initially granted status on a mainstream work, family or study visa.

Table A1 shows that the legal status of people 1 to 5 years after their entry visa for the cohort of migrants whose entry visa was in 2014 and 2015. For example, 33.4% of people who had an entry work visa in 2014 or 2015 no longer held a valid visa a year later: i.e., their visa had expired and not been renewed. This suggests that many work visa holders only come to the UK for a year (note that people will often hold work or study visas of less than five years). In fact, more than half of study/work visa holders (55%) no longer held a valid visa two years after their entry visa was granted; we can therefore assume that these people stay in the UK studying or working for less than two years. People on family visas are

significantly more likely to stay in the UK for five years after their entry visa –only 21% no longer held a valid visa five years after the initial visa grant.

**Table A1: Status of people whose entry clearance visas were issued in 2014 and 2015 (%)**

Years after entry visa	Entry visa	ILR or citizenship (%)	Temporary leave to remain (%)	Expired (%)	Total (%)
1 year	Dependent, joining or accompanying	2.0	79.7	18.2	100
	Family	1.1	98.2	0.8	100
	Study	0.0	82.0	18.0	100
	Work	0.3	66.3	33.4	100
2 years	Dependent, joining or accompanying	4.1	74.2	21.7	100
	Family	2.9	94.4	2.8	100
	Study	0.0	44.5	55.5	100
	Work	0.5	44.7	54.8	100
3 years	Dependent, joining or accompanying	6.7	54.6	38.7	100
	Family	5.2	86.2	8.6	100
	Study	0.0	33.0	66.9	100
	Work	0.7	35.3	64.0	100
4 years	Dependent, joining or accompanying	9.1	44.4	46.6	100
	Family	10.0	80.8	9.3	100
	Study	0.1	23.8	76.2	100
	Work	1.0	31.8	67.2	100
5 years	Dependent, joining or accompanying	21.3	18.2	60.5	100
	Family	38.7	40.0	21.3	100
	Study	0.1	16.4	83.5	100
	Work	9.3	15.0	75.7	100

Source: *Migrant Journey: 2020 report, data MJ\_01*

### 3. People on ten-year routes to settlement

Some people hold leave to remain that explicitly requires them to be in the UK for at least ten years before settlement. These **ten-year routes to settlement** (Family life as a partner or parent, and Private life and exceptional circumstances) also normally have the NRPF condition applied to them<sup>36</sup>.

<sup>36</sup> People on family visas (five-year route) and those on ten-year routes (family and private life) can apply for a change of conditions to have the NRPF condition removed if they become destitute or they are at imminent risk of destitution. During the period 2017 Q1 to 2020 Q1, an average of 800 people apply for a change of conditions each quarter. Applications spiked at the beginning of the pandemic (5,748 applications in 2020 Q2) and remained higher than before the pandemic (average of 1,700 per quarter from 2020 Q3 to 2021 Q3). The average acceptance rate of change of conditions applications between 2017 Q3 and 2021 Q4 was 73%. Data based on Home Office UK Visa & Immigration Transparency Data Q4 2021. See Appendix Table A1.

Family- and private-life routes arise from the impact of human rights legislation on the UK immigration system. Residents with a family in, or long-term ties to, the UK can rely on the right to family or private life protected by Article 8 of the European Convention on Human Rights (McKinney and Sumption, 2021), which says that 'everyone has the right to respect for his private and family life, his home and his correspondence'. Article 8 and children's welfare considerations allow some migrants--for example, undocumented migrants who have lived in the UK for at least 20 years, or people who do not qualify for a family visa but are parents of a British or long-term resident child--to secure permission to remain in the UK. The family- and private-life ten-year routes function in practice as a means to regularisation in the UK (Gardner and Patel, 2021), and are available to people who have overstayed a previous visa.

Some people take ten years to become eligible for settlement, not because they are on one of these routes but because they have spent time in different visa categories without accruing five years in any given one (e.g. a person who spends three years on a student visa, three on a family visa, and four on a work visa). These people can apply for ILR under the long residence route after ten years of continuous residence (paragraph 276B of the Immigration Rules). We cannot identify them in the data as they hold work, family or student visas, but most will be included in the data outlined in the previous section.

People on family- and private-life routes cannot be separately identified with the publicly available Migrant Journey data. Those on the family-life route are in the family category, while those on the private-life route are in the 'other' category. In addition, some will not be in the data at all, because they did not enter on one of the mainstream entry visa categories. Some are living in the UK without valid immigration status and have their status regularised because they qualify for one of the ten-year routes.

People in the ten-year routes need to renew their visas every 2.5 years. Importantly, qualitative research has suggested that costs and the need to make repeated applications every 2.5 years can lead to people losing status and having to start the ten years again (Gardner and Patel, 2021). This complicates efforts to estimate how long people currently living in the UK on a ten-year route still have left until their will be eligible for ILR.

Table A2 shows the estimated number of people on the ten-year routes at the end of 2020. Note that some of these people will already be included in the mainstream visa data above (if they entered on a work, family or study visa) while others will not. We subtracted ten-year route family migrants from the 'mainstream routes' family category so they are not double counted.

**Table A2: Estimated number of people holding leave to remain on the 10-year routes, by age group and sex, Q4 2020**

	Under 18s	All adults	Children + adults	Adult women	Adult men
Family life 10-year route	21,828	115,056	136,884	60,980	54,076
Private life 10-year route	9,397	16,029	25,426	8,015	8,015
<b>Total 10-year-routes</b>	<b>31,225</b>	<b>131,085</b>	<b>162,310</b>	68,995	62,091

Source: Migration Observatory briefing McKinney and Sumption (2021). *Migrants on ten-year routes to settlement in the UK*

Note: Sex breakdown based on average sex breakdown of all years (2013-2020)

Table A3 shows the number of people with temporary leave to remain at the end of 2020, for those whose initial visas were issued from 2004 onwards. Since the data do not provide a breakdown by type of applicant (main applicant and dependents) for male and female visa holders, we use the distribution of applicant types from the publicly available MJ 2020 data, which does not provide a breakdown by sex (Table A4).

Table A5 summarises our estimates of the number of adult visa holders likely to have NRPF by sex. We estimate there are about 627,000 adults holding on work and family visas, 131,000 on the ten-year route, and 500,000 with student visas. These figures do not include Hong Kong British Nationals Overseas (BNOs) (dealt with in the main report), as the Migrant Journey figures we used predate those visas.



**Table A3: Number of people with valid (temporary) leave to remain at the end of 2020, for those issued initial visas from 2004 onwards, by sex and age group**

	Category of leave at the end of 2020	Under 18	Under 18 (%)	18-29	30-49	50-69	70+	Unknown	Total male	Total adult males (18+)
Men	Dep. joining or accompanying	4470	57%	808	1959	511	56	0	<b>7804</b>	<b>3,334</b>
	Family	12280	14%	16257	54487	5754	539	1	<b>89318</b>	<b>77,038</b>
	Other	9706	27%	7025	15665	2661	238	8	<b>35303</b>	<b>25,597</b>
	Study	20829	8%	208070	36170	787	8	2	<b>265866</b>	<b>245,037</b>
	Work - Non-PBS & Other	390	3%	3632	8480	2499	176	0	<b>15177</b>	<b>14,787</b>
	Work - Tier 1	4138	21%	3336	9742	2258	138	0	<b>19612</b>	<b>15,474</b>
	Work - Tier 2	34571	20%	26871	106683	7038	103	0	<b>175266</b>	<b>140,695</b>
	Work - Tier 5	674	4%	11181	6381	378	36	0	<b>18650</b>	<b>17,976</b>
	Total	87058	14%	277180	239567	21886	1294	11	<b>626996</b>	<b>539,938</b>
		Under 18	Under 18 (%)	18-29	30-49	50-69	70+	Unknown	Total female	Total adult females (+18)
Women	Dep. joining or accompanying	4273	44%	1230	3460	703	49	0	<b>9715</b>	<b>5,442</b>
	Family	11968	7%	52293	101603	8248	392	1	<b>174505</b>	<b>162,537</b>
	Other	8541	27%	6424	14135	2243	271	2	<b>31616</b>	<b>23,075</b>
	Study	19719	7%	223088	32043	559	8	1	<b>275418</b>	<b>255,699</b>
	Work - Non-PBS & Other	356	2%	4646	8451	2812	208	0	<b>16473</b>	<b>16,117</b>
	Work - Tier 1	3776	21%	3209	9261	1478	67	0	<b>17791</b>	<b>14,015</b>
	Work - Tier 2	33444	19%	43340	96225	3986	61	0	<b>177056</b>	<b>143,612</b>
	Work - Tier 5	691	3%	17145	6688	269	34	0	<b>24827</b>	<b>24,136</b>
	Total	82768	11%	351375	271866	20298	1090	4	<b>727401</b>	<b>644,633</b>

		Under 18	Under 18 (%)	18-29	30-49	50-69	70+	Unknown	TOTAL	TOTAL ADULTS
Men & Women	Dep. joining or accompanying	8743	50%	2038	5419	1214	105	0	17,519	8776
	Family	24248	9%	68550	156090	14002	931	2	263,823	239575
	Other	18247	27%	13449	29800	4904	509	10	66,919	48672
	Study	40548	7%	431158	68213	1346	16	3	541,284	500736
	Work - Non-PBS & Other	746	2%	8278	16931	5311	384	0	31,650	30904
	Work - Tier 1	7914	21%	6545	19003	3736	205	0	37403	29489
	Work - Tier 2	68015	19%	70211	202908	11024	164	0	352,322	284307
	Work - Tier 5	1365	3%	28326	13069	647	70	0	43477	42112
	Total	169826	13%	628555	511433	42184	2384	15	1354397	1184571

Source: FOI 68698, based on Migrant Journey: report 2020

**Table A4: Share of adult dependents**

Category of leave at the end of 2020	% Adult dependents among total (adults + children)	% Adult dependents among total adults
Dep. joining or accompanying		
Family		
Other		
Study	1%	1%
Work - Non-PBS & Other	3%	3%
Work - Tier 1 & pre-PBS equivalents	22%	28%
Work - Tier 2 & pre-PBS equivalents	23%	29%
Work - Tier 5 & pre-PBS equivalents	3%	3%
<b>Total</b>		

Source: Migrant Journey: report 2020

**Table A5: Summary of visa data**

Category of leave at the end of 2020	ALL ADULTS			ADULT MEN			ADULT WOMEN			% adult dependents among total visa holders (children + adults)	% adult dependents among total adult visa holders
	Study visas	Work and family visas	10-year routes	Study visas	Work and family visas	10-year routes	Study visas	Work and family visas	10-year routes		
Dep. joining or accompanying		8,785			3337			5448			
Family		181,955	115,056		41,342	54,076		140,613	60,980		
Other		36,846	16,029		19,810	8,015		17,035	8,015		
Study	502,068			245690			256378			1%	1%
Work - Non-PBS & Other		31,120			14890			16229		3%	3%
Work - Tier 1		34,861			18267			16594		22%	28%
Work - Tier 2		291,612			144274			147338		23%	29%
Work - Tier 5		42,238			18031			24208		3%	3%
<b>Total</b>	<b>502,068</b>	<b>627,417</b>	<b>131,085</b>	<b>245690</b>	<b>259,951</b>	<b>62,091</b>	<b>256378</b>	<b>367,465</b>	<b>68,995</b>		

Source: Migrant Journey: report 2020

## Annex B: Domestic abuse prevalence and likelihood of reporting among migrants

This annex sets out our method for estimating the likelihood of domestic abuse prevalence among migrant categories covered by the first and second scenarios. For the purpose of this estimation, we follow the [government's definition](#), which defines domestic abuse as

'Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It can encompass, but is not limited to, the following types of abuse: psychological, physical, sexual, financial, or emotional.'

The Crime Survey of England and Wales contains more detail, with domestic abuse defined as any of the following:

- non-sexual abuse by a partner: physical force, emotional or financial abuse, or threats to hurt the respondent or someone close to them, carried out by a current or former partner
- non-sexual abuse by a family member: physical force, emotional or financial abuse, or threats to hurt the respondent or someone close to them, carried out by a family member other than a partner (father or mother, step-father or step-mother or other relative)
- sexual assault carried out by a partner or other family member: rape or assault by penetration including attempts, or indecent exposure or unwanted touching carried out by a current or former partner or other family member
- stalking carried out by a partner or other family member: two or more incidents (causing distress, fear or alarm) of receiving obscene or threatening unwanted letters, e-mails, text messages or phone calls; having had obscene or threatening information about them placed on the internet; waiting or loitering around home or workplace; or following or watching by any person, including a current or former partner or family member

As part of this exercise, we are interested in estimating two types of domestic abuse prevalence. First, the share of individuals that experience domestic abuse ([domestic abuse prevalence](#)), then the share of individuals that experience domestic abuse and report it to authorities or otherwise seek help ([domestic abuse reporting](#)).

### **Data sources**

As a first step in thinking about estimating domestic abuse prevalence and the reporting among migrant populations, we can imagine an ideal dataset. Such a dataset would identify all migrants in the groups identified in scenarios one and two across the United Kingdom and would allow us to run either a population or random sample survey. The survey would ask respondents whether they had experienced domestic abuse (using further list experiments to decrease the bias in reporting) and if so whether they had reported it. The individual responses on whether they had reported the experienced domestic abuse would be verified across administrative records (police, hospitalisations, NGOs) to further minimise biases in reporting. High statistical validity would require the response rate across the survey and these questions to be high, and the non-response to be randomly distributed.

Unfortunately such an approach is not possible. Just identifying the total numbers of migrants across these groups is a very difficult task, let alone reaching out to all of them individually and running a survey. The reasoning behind this is intuitively clear when we think about undocumented migrants, but also extends to other groups. In addition, eliciting true answers on having experienced domestic abuse without biases in reporting is extremely hard, researchers can almost never merge survey responses to administrative data to estimate reporting, and biases in non-response are often present. There are thus no systematic population-level data that would allow us to calculate the 'true' rate of domestic abuse prevalence and the 'true' rate of reporting for the migrant groups in the two scenarios. We therefore must estimate domestic abuse prevalence using the best data we can find—whilst recognising that it is imperfect—then make assumptions to best approximate how the estimates would speak to the migrant groups.

As we are interested in inferring population estimates, i.e. the share of individuals having experienced domestic abuse among a certain population, it is crucial to use data that allows such an approach. We relied on two data sources: the Crime Survey of England and Wales (CSEW) and recorded crime data reported by an English police force to the Home Office, which are considered to be the most comprehensive data sources on domestic abuse prevalence in England and Wales.

Table A6 summarises the data sources used in calculating the incidence of DA amongst the target groups. Strengths and limitations of the various sources are discussed in more detail below. Migration status to the level of detail required by the two scenarios is not recorded in either source, which is the largest limitation in using this data.

**Table A6: Data sources**

Data	Time period	Geography	Advantages	Limitations	Important points
Crime Survey for England and Wales (CSEW)	Annually, 2019 (03/2018-03/2020), 2018 (03/2018-03/2019), 2017 (03/2016-03/2017) <sup>37</sup>	England and Wales	<p>Survivors can self-report their experience despite having not reported the abuse anywhere else, meaning CSEW covers many crimes that are not reported to the police.</p> <p>The sample of the population is drawn from the small users' Postcode Address File (PAF), accepted as the best general population sampling frame in England and Wales. With the use of weights, it is representative of socio-demographic groups as well.</p>	<p>Detailed migration status is not recorded. There is only a set of questions that ask about being born in the United Kingdom and the time of the individual's arrival.</p> <p>Many of these migrants, particularly if undocumented, would be unlikely to agree to a face-to-face survey.</p> <p>It can be hard to differentiate crimes from incidents of domestic abuse, and many of these survivors will never come forward to the police nor any service provider.</p>	<p>Analysis presented in the release covers adults aged 16 to 74 years who are resident in households in England and Wales and who completed the self-completion section of CSEW on domestic abuse, sexual assault and stalking. For full CSEW definition of domestic abuse see first page of this annex.</p>
Police Incident data  Police Recorded Crime	Annually, 2017 and 2018	England and Wales, one large police force area	<p>The best population proxy of how many survivors do come forward and ask for assistance when dealing with domestic abuse.</p> <p>The data are very detailed and allow for differentiating different levels and types of victimisation (including re-victimisation).</p> <p>Due to the clear geographical scope of police territorial areas and their population characteristics, it allows calculation of average and specific socio-demographic reporting rates.</p>	<p>Migration status is not recorded although nationality of victim and perpetrator are sometimes recorded.</p> <p>Many of these groups of migrants, particularly the undocumented, would be unlikely to report their victimisation to the police.</p> <p>Does not include crimes that have not been reported to the police.</p>	<p>Data on crimes recorded by the police that were identified and verified as domestic abuse-related. Incidents refer to domestic abuse-related incidents that did not get recorded as a crime.</p>

<sup>1</sup> The CSEW 2021 was affected by the Covid-19 pandemic.

To produce prevalence estimates, we needed data with a precise population-level denominator (whether this was the full population, a specific socio-demographic group, the full migrant population, or a subset of the migrant population). Without knowing the denominator, it is impossible to calculate the prevalence rate of domestic abuse. Otherwise, the estimation of prevalence is likely to suffer from self-selection bias, or issues around selecting on the dependent variable.

A number of charities record subsets of their own data about service users, and some provide more detailed information on migration status, and while these are really important qualitatively to understand the context of their work, they fail to provide us with population estimates. For example, a domestic abuse charity working in East London and Birmingham and specialising in offering support to women speaking Polish and Urdu might report that it works with on average 200 women every year out of which 75% have no recourse to public funds (NRPF). We cannot however use such statistics to back out the domestic abuse prevalence amongst Polish migrant women, and the share who have no recourse to public funds. These statistics may not provide the context required to understand the national and local picture of domestic abuse (for example specialising in a certain locality where migrant groups are more concentrated); population estimates cannot be calculated (as the denominators are unclear); and the different sources may not be comparable across time or space due to differing definitions of domestic abuse. Finally, statistics from local services that specialise in giving support to migrant populations almost certainly suffer from selection bias as they are by definition likelier to attract victims that have no other option to receive support. These figures are nevertheless very useful in understanding prevalence in particular migration groups and the demand on local services and NGOs.

More generalisable figures appear in the Domestic Abuse Reports produced annually by Women’s Aid, a domestic-violence charity. Of their service users in England, they reported that 3,262 were not British nationals in financial year 2019/20, and 4,075 in 2021/22. Using these figures we calculated the average rate of domestic abuse reporting to Women’s Aid per 1000 Non-British and British individuals over these two years (Table A7). On average, 0.66 per 1000 non-British individuals seek help from Women’s Aid every year, compared to 0.59 per 1000 British individuals. However these figures are likely to be much lower than the true rates for both Non-British and British nationals, as they reflect only reports to a single charity working in the sector.

**Table A7: Women’s Aid users by nationality and domestic abuse incidence (England, 2019-2021)**

	Women’s Aid users in England		Total UK population (2019)	Average annual rate per 1000
	2019/20	2020/21		
<b>Non-British Nationals</b>	3,262	4,075	5,587,000	0.66
<b>British Nationals</b>	23,868	34,860	50,040,000	0.59

*Source: Author’s calculations based on Women’s Aid Domestic Abuse report (2021, 2022); ONS Population by country of birth and nationality, January- December 2019.*

The most recent report (Annual Audit 2022) focusing on FY 2020-2021, reported 30% of the non-British nationals (1,223) had no recourse to public funds, while 9.5% did not know if they had recourse to public funds. Individuals who were not British nationals had a wide range of immigration statuses; the most common were indefinite leave to remain (19.7%) followed by spouse visa (15.9%).

## Assumptions

For the reasons set out above, we could not calculate the true rate of domestic abuse incidence among migrant categories eligible for the two scenarios. We therefore estimated their likelihood of being a domestic abuse survivor and of reporting the abuse by looking at the most similar groups for which we did have data.

The groups of 'most' similar individuals were defined as those of the same gender and age, and similar employment status, as these characteristics are correlated with the likelihood of domestic abuse victimisation. Of course, these are not the only categories that influence the likelihood of domestic abuse victimization. Any vulnerability that leads to an imbalance in power in a relationship is general a predictor of domestic abuse victimization. For example, in the CSEW ending in March 2020, on average 11.18% of disabled individuals experience domestic abuse, which is more than twice the share of non-disabled individuals (4.6%). Similarly, migration status that depends on the partner leads to complete dependence of the victim and an imbalance in power, which converge to create a 'matrix of domination' (Collins, 2000). Moreover, the poverty and destitution faced by migrant women is often attributable to immigration policy and reinforces their vulnerability to domestic abuse victimization. However, due to the limits in data availability beyond age and gender breakdowns in migration data, and the fact that migration status is not available in data on in domestic abuse prevalence, we are unable to reflect these factors in our estimates.

We also discussed at length whether to adjust for domestic abuse prevalence among different ethnic groups and nationalities. In the end, we decided against this as it would require too many uncertain assumptions. Migration statistics have information about nationality but not ethnicity, while domestic abuse figures have data on ethnicity but not nationality. Moreover, most minority ethnic individuals across the United Kingdom are not migrants, so it is not clear that domestic abuse prevalence by ethnicity would be representative of migrant groups.

The rates of domestic abuse incidence were calculated using data from England and Wales, and assumed to hold for all of the UK (Scotland, Northern Ireland). The home nations have different total number of resident migrants, but there is no reason to expect that their likelihood of experiencing domestic abuse should vary, especially holding constant the availability of local services that we are assuming.

## Techniques for calculating prevalence and reporting

The calculations in basic form are, for each scenario:

$$\text{Prevalence (number of DA survivors)} = \text{total number of migrants affected} \times \text{average domestic abuse incidence}$$

$$\text{Number of survivors reporting to police or requiring assistance} = \text{total number of migrants affected} \times \text{average domestic abuse reporting likelihood to police}$$

We estimated prevalence by applying population-level data on the domestic abuse prevalence for the same gender and age breakdowns as present in these migrant groups, weighted by the proportion who were employed based on CSEW data. Gender and age appear in both in the migration and domestic abuse data, so these should be fairly good



estimates. Employment status does not appear directly in the migration data and the uncertainty around it is much larger. For all genders and age cohorts we have applied the same ratio of unemployed: employed, based on data from CSEW.

Detailed calculations appear in the spreadsheet that accompanies this report.

**Table A8: Basic equations for estimating prevalence**

A	B	C	D	E	F		
Age	Number of WOMEN	Number of MEN	prevalence MEN by age (%)	prevalence WOMEN by age (%)	Ratio unemployed/employed	TOTAL MALE SURVIVORS BY AGE	TOTAL FEMALE SURVIVORS BY AGE
Aged 20-29	W1	M1	dm1	dw1	R1=U/E	$(M1*dm1)*R1$	$(W1*dw1)*R1$
Aged 30-39	W2	M2	dm2	dw2		$(M2*dm2)*R1$	$(W2*dw2)*R1$
Aged 40-49	W3	M3	dm3	dw3		$(M3*dm3)*R1$	$(W3*dw3)*R1$
Aged 50-59	W4	M4	dm4	dw4		$(M4*dm4)*R1$	$(W4*dw4)*R1$
Aged 60-69	W5	M5	dm5	dw5		$(M5*dm5)*R1$	$(W5*dw5)*R1$

Sources:

- Columns A-C: Migration Observatory estimates
- Columns D-E: CSEW or police recorded crime
- Column F: CSEW

## Annex C. Detailed cost calculations

Table A11, below, sets out general inputs for the cost model. Unless otherwise indicated, these variables underpin the modelling for all survivors regardless of migration status. Because information about the demographic attributes of this cohort (especially the undocumented population) is poor, several of the inputs rely on researchers' judgement based on qualitative or incomplete quantitative evidence. The highlighted cells indicate inputs that were specifically varied in the spreadsheet model to test the effect of alternative assumptions.

**Table A9: General inputs to the model of costs**

Input	Variable			Source
	%	Number	£ per annum	
<b>OF VICTIMS REPORTING, % SEEKING REFUGE/ACCOMMODATION FROM SPECIALIST SERVICES</b>				
Regular migrants except students and visitors	30%			Judgement. Of victims that do get help from domestic abuse services, 70% of survivors access community based services like counselling and advocacy and do not access refuge or accommodation <a href="https://safelives.org.uk/sites/default/files/resources/SafeLives%20Briefing%20for%20Second%20Reading%20of%20DA%20Bill%2028.04.20_0.pdf">https://safelives.org.uk/sites/default/files/resources/SafeLives Briefing for Second Reading of DA Bill 28.04.20_0.pdf</a>
undocumented/ irregular, visitors and students	20%			Judgement. Proportion accessing refuge may be lower amongst undocumented and temporary visitors
<b>COST PER ANNUM</b>				
Annual cost of UC for single person			£7,939	Per DWP statistics, median UC payment for single childless claimant in London in Nov 2021 was £661.55/month
Annual cost of UC for family			£15,167	Per DWP statistics, median UC payment for single parent claimant in London in Nov 2021 was £1263.89/month
Annual cost of by & for services not covered by UC per beneficiary			£2,000	Per discussions with sector and unpublished research
Average annual child benefit per household with children			£1,718	Annual child benefit for notional family with 1.83 children (100% of £21.05/week for the first child, and 83% of £13.95/week for subsequent child).
<b>PERIOD FOR WHICH COST INCURRED</b>				
Average years claiming UC		1.5		Per DWP statistics, median length of time claiming UC is between 1 and 2 years. No breakdown available by household type
Average extra years child benefit for those on <u>main route</u>		2.5		Assumes median victim has been in UK for 1/2 the period necessary to qualify for ILR

Average extra years child benefit for those on <u>10-year route</u>		5		Assumes median victim has been in UK for 1/2 the period necessary to qualify for ILR
Years child benefit for <u>undocumented</u> under S1 <u>OR</u> <u>exceptional visa</u> S2 (based on 10-year CBA)		10		Assumes victims with children will claim child benefit for full 10-year period of CBA
Period after which victims/survivors secure new or better employment (in years)	1.5			Default: same as average years claiming UC
<b>HOUSEHOLDS WITH CHILDREN</b>				
% of victims with children	36%			Recent research (unpublished) into victims w/NRPF found 26% had children. 'Safe and secure' evaluation of pilot found 45% had children. Avg 35.5%.
Average number of children in victim households with children		1.83		On average, families of non-UK born households have 1.83 children per DWP.
<b>PROPORTIONS AWARDED DVILR/CLAIMING UC</b>				
% awarded DDVC who proceed to DVILR (main and 10-year routes)	76%			Not all who get DVC proceed to DVILR. Avg calculated from HO stats on DDVC/DVILR
% of <u>visitors/students</u> who successfully apply for DVILR	1%			Most here for a short visit so few are expected to seek ILR. Assumption can be varied.
% of those getting DVILR who would claim UC	75%			Most who attain DVILR will have come through DDVC route, which requires they evidence destitution.
<b>OTHER</b>				
Standard social time preference rate	3.5%			From HM Treasury Green Book

*Costs of Scenarios 1 and 2 - Specific inputs to each scenario*

Tables A12 and A13 set out the inputs specific to Scenario 1 and Scenario 2 respectively. In both scenarios, we have assumed that the initial assistance period lasts 6 months for regular and undocumented migrants, and on average one month for visitors and students. Again the highlighted cells indicate inputs that were specifically varied in the spreadsheet model to test the effect of alternative assumptions.

**Table A10: Inputs to Scenario 1**

Input	Variable		Source
	%	Number	
% of <u>undocumented</u> victims who would be granted DVILR	25%		% of those granted ILR likely to be lower than for those with regular status. Judgement.
Initial period of emergency support in months: S1 main route		6	Select Committee recommended 6 months support
Average period of emergency support required in months for <u>visitors and students</u>		1	Eligibility 6 months as for main route. Assume most will leave so estimate is one month

**Table A11: Inputs to Scenario 2**

Input	Variable		Source
	%	Number	
Period of emergency support in months: S2 special fund: <u>regular migrants</u> except temporary		6	
Period of emergency support in months: S2 special fund: <u>undocumented</u>		6	
Period of emergency support in months: S2 special fund: <u>students and visitors</u>		1	
% of <u>undocumented/irregular/temporary</u> visitors who successfully apply for DVILR	10%		% of those granted ILR likely to be lower in Scenario 2 than Scenario 1. Judgement.
% of BAU expenditure incurred by unsuccessful DVILR applicants who re-present to public services in the following year	25%		Judgement

For the cost calculations, we classified beneficiaries by migration status where relevant, and by whether or not they had children, which affects amounts of UC and child benefit. Estimated costs for the initial period for Scenario 1 are set out below. The cost of the initial period (six months support for all except visitors and students, who receive support for an average of one month) is about £42 million.

**Table A12: Costs for initial period, Scenario 1**

	Number	Annual £ per head	Total cost	Comment
<b>INITIAL PERIOD</b>				
All childless except visitors & students	3,461	£7,939	£13,736,970	UC equivalent only.
All victims w/minor child(ren) except visitors & students	1,947	£15,167	£14,762,506	UC equivalent only; no child benefit as no ILR yet
Additional amount for services		£2,000	£10,815,013	Paid for via fund to by & for services
Childless visitors & students	1,441	£7,939	£953,140	UC equivalent only, support for limited period (see Inputs C34)
Visitors & students w/children	810	£15,167	£1,024,297	As above, no child benefit.
Additional amount for services			£375,200	Paid for via fund to by & for services. Per capita amount smaller than for other S1 beneficiaries as duration of support is less.
<b>TOTAL FOR INITIAL PERIOD</b>			<b>£41,667,126</b>	Covers six months' support for all except visitors and students, who receive support for an average of 1 month

The one-year cost for those who proceed to ILR would be about £30 million in the first full year after the initial period, an amount which would fall over time.

**Table A13: Annual costs for those awarded ILR, Scenario 1**

	Number	Annual £ per head	Total cost	Comment
<b>EXTENDED SUPPORT PHASE – FOR THOSE WITH ILR. ANNUAL COSTS AFTER INITIAL PERIOD</b>				
Annual cost of public funds for those on <u>mainstream routes</u> including BNOs: childless victims	1,074	£7,939	£8,523,819	Childless regular migrants not on family route. Not all proceed to DVILR. UC only
victims w/child(ren) UC	604	£15,167	£9,160,167	UC element
victims w/child(ren): child benefit		£1,718	£1,899,124	Assumes same % have children as in overall cohort.
Annual cost of public funds for those on <u>10-year route</u> : childless victims UC	294	£7,939	£2,335,335	Only those on family route. Not all proceed to DVILR. UC only. Assumes 100% of victims would claim UC
victims w/child(ren) UC	165	£15,167	£2,509,680	UC element. Assumes same % have children as in overall cohort.
victims w/child(ren): child benefit		£1,718	£520,317	
Annual cost of public funds for <u>undocumented</u> : childless victims UC	199	£7,939	£1,579,273	
victims w/child(ren) UC	112	£15,167	£1,697,174	
victims w/child(ren): child benefit		£1,718	£351,865	
Visitors & students: childless victims UC	14	£7,939	£114,377	
victims w/children: UC	8	£15,167	£122,916	
victims w/children: child benefit		£1,718	£25,483	
Residual public sector and administrative costs			£1,619,621	
<b>ANNUAL TOTAL AFTER INITIAL PERIOD, FOR THOSE WITH ILR</b>			<b>£30,459,153</b>	First full year after initial period. Costs decline in later years

Table A16 gives costs and gains over ten years for the first annual cohort (that is, the victims who come forward for assistance in the first year). For the first decade, the present value of costs to the public sector *for this first cohort* would be about £62 million. This would generate gains worth £246 million to victims themselves, wider society, and the public sector. The BCR for the first annual cohort would be approximately 4:1.



**Table A14: Scenario 1 costs and gains over 10 years, first annual cohort**

	0	0	1	2	3	4	5	6	7	8	9	10
Elements of cost	initial period	remainder of first year										
Emergency initial period including add'l services	£41,667,126											
Universal Credit—main route		£8,841,993	£17,683,986	£0	£0	£0	£0	£0	£0	£0	£0	£0
Child benefit main route		£949,562	£1,899,124	£1,899,124	£0	£0	£0	£0	£0	£0	£0	£0
Universal Credit—10-year		£2,422,508	£4,845,016	£0	£0	£0	£0	£0	£0	£0	£0	£0
Child benefit 10-year route		£260,159	£520,317	£520,317	£520,317	£520,317	£520,317	£0	£0	£0	£0	£0
Universal Credit—undocumented, visitors & students who get ILR		£1,756,870	£3,513,740	£0	£0	£0	£0	£0	£0	£0	£0	£0
Child benefit undocumented, visitors & students who get ILR		£188,674	£377,349	£377,349	£377,349	£377,349	£377,349	£377,349	£377,349	£377,349	£377,349	£377,349
Residual admin and public-sector costs LESS higher tax revenues		£1,619,621	£1,619,621	£0	£0	£0	£0	£0	£0	£0	£0	£0
<b>Annual total S1 costs Y0 cohort</b>		£57,706,512	£30,459,153	£2,796,790	£897,666	£897,666	£897,666	£377,349	£377,349	£377,349	£377,349	£377,349
Current (BAU) costs		£16,196,208	£16,196,208	£0	£0	£0	£0	£0	£0	£0	£0	£0
<b>Total costs Y0 cohort net of BAU</b>		£41,510,304	£14,262,944	£2,796,790	£897,666	£897,666	£897,666	£377,349	£377,349	£377,349	£377,349	£377,349
<b>PV annual net costs Y0 cohort</b>		£41,510,304	£13,780,623	£2,610,833	£809,643	£782,264	£755,811	£306,973	£296,593	£286,563	£276,872	£267,510
<b>SUM OF PVs OF S1 NET COSTS FOR 1<sup>ST</sup> COHORT</b>											<b>£61,683,989</b>	
<b>PV OF S1 GAINS FOR FIRST COHORT</b>											<b>£246,164,807</b>	
<b>RATIO OF BENEFITS/COSTS (BCR)</b>											<b>3.99:1</b>	

On the assumption that a similar number of victims would come forward each year, Table A17 provides calculations for each annual cohort under Scenario 1. For the first decade, the present value of costs to the public sector *for all cohorts* would be about £540 million. This would generate gains worth about £2.3 billion to victims themselves, wider society, and the public sector. The BCR for all cohorts would be about 4.27:1.

**Table A15: Costs vs gains for annual cohorts to Y10, Scenario 1**

<b>COSTS BY YEAR</b>											
<b>Cohort</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>
Year 0	£41,510,304	£13,780,623	£2,610,833	£809,643	£782,264	£755,811	£306,973	£296,593	£286,563	£276,872	£267,510
Year 1		£41,510,304	£13,780,623	£2,610,833	£809,643	£782,264	£755,811	£306,973	£296,593	£286,563	£276,872
Year 2			£41,510,304	£13,780,623	£2,610,833	£809,643	£782,264	£755,811	£306,973	£296,593	£286,563
Year 3				£41,510,304	£13,780,623	£2,610,833	£809,643	£782,264	£755,811	£306,973	£296,593
Year 4					£41,510,304	£13,780,623	£2,610,833	£809,643	£782,264	£755,811	£306,973
Year 5						£41,510,304	£13,780,623	£2,610,833	£809,643	£782,264	£755,811
Year 6							£41,510,304	£13,780,623	£2,610,833	£809,643	£782,264
Year 7								£41,510,304	£13,780,623	£2,610,833	£809,643
Year 8									£41,510,304	£13,780,623	£2,610,833
Year 9										£41,510,304	£13,780,623
Year 10											£41,510,304
<b>Sum of NET costs for cohorts from years 0 - 10 (undiscounted)</b>											
	£41,510,304	£55,290,927	£57,901,760	£58,711,404	£59,493,668	£60,249,479	£60,556,452	£60,853,044	£61,139,607	£61,416,480	£61,683,989
<b>PVs of S1 net costs for cohorts from years 0-10</b>											
	£41,510,304	£53,421,185	£54,051,913	£52,954,322	£51,845,294	£50,728,444	£49,262,713	£47,829,943	£46,430,124	£45,063,173	£43,728,941
<b>SUM OF PVs OF S1 NET COSTS FOR Y0-10 COHORTS</b>											<b>£536,826,358</b>
<b>GAINS BY YEAR: Total gains for annual cohorts from Years 0-10 (undiscounted)</b>											
	£246,164,807	£246,164,807	£246,164,807	£246,164,807	£246,164,807	£246,164,807	£246,164,807	£246,164,807	£246,164,807	£246,164,807	£246,164,807
<b>PVs of S1 gains for Y0-10 cohorts</b>											
	£246,164,807	£237,840,394	£229,797,482	£222,026,552	£214,518,408	£207,264,162	£200,255,229	£193,483,313	£186,940,399	£180,618,743	£174,510,863
<b>SUM OF PVs OF S1 GAINS FOR Y0-10 COHORTS</b>											<b>£2,293,420,355</b>
<b>BENEFIT/COST RATIO (BCR)</b>											<b>4.27:1</b>

Estimated Y0 costs for **Scenario 2** appear in Table A18. The cost of the initial period (six months support for all except visitors and students) is the same as under Scenario 1--about £42 million—as the scenarios differ in the way initial support is delivered, but not in terms of the amount.

**Table A16: Costs for initial period, Scenario 2**

	Number	Annual £ per head	Total cost for initial period	Comment
<b>INITIAL PERIOD: REGULAR MIGRANTS ON mainstream AND 10-YEAR ROUTES</b>				
Childless victims on <u>mainstream &amp; 10-year routes</u>	2,400	£7,939	£9,525,574	UC equivalent only.
Victims w/minor child(ren) on mainstream & 10-year routes	1,350	£15,167	£10,236,708	UC equivalent only; no child benefit as no ILR yet
Add'l amount for services		£2,000	£7,499,413	Paid for via fund to by & for services
<b>INITIAL PERIOD: SPECIAL FUND FOR EMERGENCY ASSISTANCE</b>				
<u>Undocumented/irregular: childless victims</u>	1,061	£7,939	£4,211,396	Payment @ level of UC
Undocumented/irregular w/child(ren)	597	£15,167	£4,525,798	
Additional amount for services		£2,000	£3,315,600	Paid for via fund to by & for services
<u>Students/visitors: childless</u>	1,441	£7,939	£953,140	Reflects assumed shorter average period of support required
Students/visitors w/child(ren)	810	£15,167	£1,024,297	Reflects assumed average shorter period of support required
Additional amount for services		£2,000	£375,200	Paid for via fund to by & for services; reflects shorter avg period of support required
<b>TOTAL FOR INITIAL PERIOD</b>			<b>£41,667,126</b>	Covers six months' support for all except visitors and students, who receive support for an average of 1 month

Under Scenario 2 the one-year cost for those who proceed to ILR, after the initial period, would be about £29 million in the first year (slightly less than under Scenario 1). Again this amount would fall over time.

**Table A17: Annual costs for those awarded ILR, Scenario 2**

<b>EXTENDED SUPPORT PHASE – FOR THOSE WITH ILR. ANNUAL COSTS</b>				
Annual cost of public funds for those on <u>mainstream routes</u> : childless victims UC	1,074	£7,939	£8,523,819	Regular migrants not on family route. Not all proceed from DDVC to DVILR. Assumes same % have children as in overall cohort. UC only
victims w/child(ren) UC	604	£15,167	£9,160,167	As above, UC
victims w/child(ren): child ben		£1,718	£1,899,124	As above, child benefit
Annual cost of public funds for those on <u>10-year route</u> : childless victims UC	294	£7,939	£2,335,335	Only those on family route. Not all proceed from DDVC to DVILR. Assumes same % have children as in overall cohort. UC only. Assumes 100% of victims would claim UC
victims w/child(ren) UC	165	£15,167	£2,509,680	As above, UC
victims w/child(ren): child ben		£1,718	£520,317	As above, child benefit
Annual cost of public funds for <u>undocumented granted exceptional visa</u> : childless victims UC	106	£7,939	£842,279	
victims w/child(ren) UC	60	£15,167	£905,160	
victims w/child(ren): child ben		£1,718	£187,661	
Visitors & students granted exceptional visa: childless	14	£7,939	£9,531	
w/child(ren): UC	8	£15,167	£10,243	
victims w/child(ren): child ben		£1,718	£25,483	
Residual public sector and administrative costs			£1,619,621	
<b>ANNUAL TOTAL AFTER INITIAL PERIOD, FOR THOSE WITH ILR</b>			<b>£28,548,422</b>	First full year after initial period. Costs decline in later years

Table A20 gives costs and gains over ten years for the first annual cohort (that is, the victims who come forward for assistance in the first year) under Scenario 2. For the first decade, the present value of costs to the public sector *for this first cohort* would be about £61 million. This would generate gains worth £226 million to victims themselves, wider society, and the public sector. The BCR for the first annual cohort would be approximately 3.7:1.

**Table A18: Scenario 2 costs and gains over 10 years, first annual cohort**

Costs	initial period	rest of 1st year, if any	1	2	3	4	5	6	7	8	9	10
Emergency/ temp for regular migrants	£27,261,695											
Special fund for undoc'd/ irregular/ temporary	£14,405,430											
UC--main		£8,841,993	£17,683,986	£0	£0	£0	£0	£0	£0	£0	£0	£0
Child benefit -- main		£949,562	£1,899,124	£1,899,124	£0	£0	£0	£0	£0	£0	£0	£0
UC -- 10-year		£2,422,508	£4,845,016	£0	£0	£0	£0	£0	£0	£0	£0	£0
Child ben-- 10-year		£260,159	£520,317	£520,317	£520,317	£520,317	£520,317	£0	£0	£0	£0	£0
UC for undoc'd etc who get ILR		£883,607	£1,767,213	£0	£0	£0	£0	£0	£0	£0	£0	£0
Child benefit for above		£106,572	£213,145	£213,145	£213,145	£213,145	£213,145	£213,145	£213,145	£213,145	£213,145	£213,145
Residual admin costs		£1,619,621	£1,619,621	£0	£0	£0	£0	£0	£0	£0	£0	£0
<b>Annual total S2 costs Y0 cohort</b>			£2,849,179	£712,295	£178,074	£44,518	£11,130	£2,782	£696	£174	£43	£11
Current (BAU) costs		£16,196,208	£16,196,208	£0	£0	£0	£0	£0	£0	£0	£0	£0
<b>Annual costs Y0 cohort less BAU</b>		£40,554,939	£15,201,393	£3,344,881	£911,536	£777,981	£744,592	£215,927	£213,840	£213,319	£213,188	£213,156
<b>PV annual net costs Y0 cohort</b>		<b>£40,554,939</b>	<b>£14,687,336</b>	<b>£3,122,482</b>	<b>£822,153</b>	<b>£677,965</b>	<b>£626,926</b>	<b>£175,657</b>	<b>£168,077</b>	<b>£161,997</b>	<b>£156,423</b>	<b>£151,110</b>
<b>SUM OF PVs OF S2 NET COSTS FOR 1ST COHORT</b>												<b>£61,305,066</b>
<b>PV OF S2 GAINS FOR FIRST COHORT</b>												<b>£226,259,156</b>
<b>BENEFIT-COST RATIO (BCR)</b>												<b>3.7:1</b>

Assuming a similar number of victims would come forward each year, Table A19 provides calculations for each annual cohort under Scenario 2. For the first decade, the present value of costs to the public sector *for all cohorts* would be about £537 million. This would generate gains worth about £2.1 billion to victims themselves, wider society, and the public sector. The BCR for all cohorts would be about 4:1.

**Table A19: Costs vs gains for annual cohorts to Y10, Scenario 2**

<b>COSTS BY YEAR</b>											
<b>Cohort</b>	0	1	2	3	4	5	6	7	8	9	10
Y0	£40,554,939	£14,687,336	£3,122,482	£822,153	£677,965	£626,926	£175,657	£168,077	£161,997	£156,423	£151,110
Y 1		£40,554,939	£14,687,336	£3,122,482	£822,153	£677,965	£626,926	£175,657	£168,077	£161,997	£156,423
Y 2			£40,554,939	£14,687,336	£3,122,482	£822,153	£677,965	£626,926	£175,657	£168,077	£161,997
Y 3				£40,554,939	£14,687,336	£3,122,482	£822,153	£677,965	£626,926	£175,657	£168,077
Y 4					£40,554,939	£14,687,336	£3,122,482	£822,153	£677,965	£626,926	£175,657
Y 5						£40,554,939	£14,687,336	£3,122,482	£822,153	£677,965	£626,926
Y 6							£40,554,939	£14,687,336	£3,122,482	£822,153	£677,965
Y 7								£40,554,939	£14,687,336	£3,122,482	£822,153
Y 8									£40,554,939	£14,687,336	£3,122,482
Y 9										£40,554,939	£14,687,336
Y 10											£40,554,939
<b>Sum of costs for cohorts from years 0 - 10 (undiscounted)</b>											
	£40,554,939	£55,242,275	£58,364,758	£59,186,911	£59,864,876	£60,491,802	£60,667,459	£60,835,536	£60,997,533	£61,153,956	£61,305,066
<b>PV of S2 costs for cohorts fm yrs 0-10</b>											
	£40,554,939	£53,374,179	£54,484,126	£53,383,203	£52,168,781	£50,932,474	£49,353,017	£47,816,181	£46,322,231	£44,870,551	£43,460,314
<b>SUM OF PVs OF S2 NET COSTS FOR Y0-10 COHORTS</b>											<b>£536,719,998</b>
<b>GAINS BY YEAR: Total gains for annual cohorts from Years 0-10 (undiscounted)</b>											
	£226,259,156	£226,259,156	£226,259,156	£226,259,156	£226,259,156	£226,259,156	£226,259,156	£226,259,156	£226,259,156	£226,259,156	£226,259,156
<b>PVs of S2 gains for Y0-10 cohorts</b>											
	£226,259,156	£218,607,880	£211,215,343	£204,072,795	£197,171,783	£190,504,138	£184,061,969	£177,837,651	£171,823,817	£166,013,350	£160,399,372
<b>SUM OF PVs OF S2 GAINS FOR Y0-10 COHORTS</b>											<b>£2,107,967,253</b>
<b>BENEFIT/COST RATIO (BCR)</b>											<b>3.9:1</b>

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