Action For Refugees In Lewisham

F3, 2nd Floor
Leemore Central Community Hub
Bonfield Road
Lewisham SE13 5ES

Tel - 0208 297 4111

Email - info@afril.org.uk
Web - www.afril.org.uk

Healthy Start Consultation October 2024

Healthy Start is a scheme that helps low-income families buy healthy food and vitamins for pregnant women and children under four. The scheme provides:

- A prepaid card with money to buy milk, fruit, vegetables, pulses, and baby formula
- Free vitamins
- Encouragement to breastfeed and eat a healthy diet

Currently this scheme is not available for people who have a 'No Recourse to Public Funds' condition, and people who are subject to immigration control, unless they have a British child aged under 4. The government has run a consultation to seek views on whether eligibility for the Healthy Start scheme should be extended to include people who are prevented from accessing public funds due to immigration controls.

AFRIL works with a large number of people who are excluded from this scheme at present due to their immigration status. We strongly believe this scheme should be extended to all low-income families regardless of their immigration status, and so together with input from our members, we responded to the consultation.

See more about the consultation here:
https://www.gov.uk/government/consultations/healthy-start-eligibility-for-families-who-cannot-access-public-funds/eligibility-for-healthy-start-for-groups-who-have-no-recourse-to-public-funds-or-are-subject-to-immigration-controls

Question 1. "At present, Healthy Start is restricted to those in receipt of certain qualifying public funds and those with NRPF, or who are subject to immigration controls, who have at least one British child aged under 4. Do you agree or disagree with the current eligibility criteria for Healthy Start?

(Disagree)

Action for Refugees in Lewisham (AFRIL) disagrees with the current eligibility criteria for Healthy Start. AFRIL is a community organisation working with refugees, asylum seekers and vulnerable migrants in South East London, living in poverty due to their immigration status. The stated purpose of the Healthy Start Scheme is to reduce health inequalities, by supporting women and children most at risk of poor nutritional outcomes (due to their low income), to access nutritious foods and essential vitamins.

Action For Refugees In Lewisham

F3, 2nd Floor
Leemore Central Community Hub
Bonfield Road
Lewisham SE13 5ES

Tel - 0208 297 4111

Email - info@afril.org.uk
Web - www.afril.org.uk

At present, in order to be eligible for the Healthy Start Scheme applicants must be accessing means tested benefits, meaning the majority of AFRIL's members are unable to access the scheme as they are excluded from accessing public funds (e.g. asylum seekers in receipt of support under the *the Immigration and Asylum Act 1999*, individuals with a no recourse to public funds (NRPF) condition attached to their visa, 'undocumented' families with an irregular immigration status, individuals in receipt of basic support under Section 17 of the *Children Act 1989).*

We believe that the current eligibility criteria for Healthy Start directly contravenes the purpose of the scheme, by excluding children in families with 'no recourse to public funds', as children from families who are unable to access means tested benefits are often living in even more extreme poverty, and are at even higher risk of poor nutritional outcomes than families who currently qualify for Healthy Start.

To respond to this consultation we have spoken to the people our charity exists to support, AFRIL members, who at some point, have been unable to apply for Healthy Start vouchers due to their immigration status. Their experience demonstrates the absolute necessity, and urgency, of extending this scheme to all families regardless of immigration status, to ensure that the women and children "in the greatest need" can access nutritious foods and essential vitamins.

Question 2. "Do you agree or disagree that eligibility for Healthy Start should be extended to non-British children under 4 from families with NRPF or who are subject to immigration controls?"

(Agree)

AFRIL, and our members, believe that yes, the Healthy Start Scheme should be extended to all children under the age of 4, from families that meet the financial eligibility criteria, regardless of their nationality or of their parents' immigration status. We feel that the current eligibility criteria for Healthy Start discriminates against children because of their nationality and the immigration status of their parents. Related to this, the majority of people subject to immigration control and with a NRPF condition will be people of colour/racialised.

AFRIL works with a significant number of people who are subject to immigration control, are experiencing destitution and have children under 4 years of age, but are excluded from the Healthy Start scheme because of their immigration status.

Action For Refugees In Lewisham

F3, 2nd Floor
Leemore Central Community Hub
Bonfield Road
Lewisham SE13 5ES

Tel - 0208 297 4111

Email - info@afril.org.uk
Web - www.afril.org.uk

Not being able to access nutritious foods and vitamins at a young age can have a profound impact on a child's health. One AFRIL member, who previously had NRPF and no status, but now has Leave to Remain and is receiving healthy start vouchers, spoke to us about the impact not being able to afford nutritious foods and vitamins had on her child's health when she was without recourse to public funds. She explained her son had low Vitamin D and Iron levels, which led to pigmentation issues with his skin. The GP attributed this condition and his deficiencies to his diet not containing ample amounts of fruit, vegetables and vitamins.

She was able to access the Healthy Start vouchers by the time her son was around 3.5 years old, however she said "if we had the healthy start vouchers right from when I gave birth to him, possibility this would not have happened to him". This mother spoke of the huge impact that now being able to access the scheme has had on her family. She described her children's new found love for red plums and blueberries, fruits she would not have chosen previously due to being unable to afford them. She spoke of how her family have been able to explore new fruits and vegetables, and how her confidence when cooking has grown as she is able to try nutritious recipes with ingredients she couldn't previously afford.

It is accepted that health outcomes in early childhood play a significant role in determining future risk of chronic illness (disease, obesity and diabetes) and therefore an investment in the health of all children, regardless of immigration status, is an investment in both the child's future, and the future of the NHS.

Question 3. "Do you agree or disagree that eligibility for Healthy Start should be extended to pregnant women with NRPF or who are subject to immigration controls?"

(Agree)

AFRIL, and our members, believe that yes, Healthy Start should be extended to all pregnant persons who meet the financial eligibility criteria. It is imperative that pregnant persons are able to receive adequate nutrition for not only their own health, but for the health and development of their child; a notion expressed in the statutory purpose of the Healthy Start scheme.

There is extensive research demonstrating that pregnant persons of colour in the UK experience higher levels of pregnancy-related inequality and adverse outcomes than white women. A report by the Parliamentary Women and Equalities Committee in 2023 found that "maternal mortality for Black women is currently almost four times higher than for White women". There is a need for urgent, and targeted interventions to address healthcare inequalities and improve maternal outcomes for all pregnant persons in the UK. Access to Healthy Start vouchers for all pregnant

Action For Refugees In Lewisham

F3, 2nd Floor
Leemore Central Community Hub
Bonfield Road
Lewisham SE13 5ES

Tel - 0208 297 4111

Email - info@afril.org.uk
Web - www.afril.org.uk

persons who meet the financial criteria would be one such important intervention, contributing to improving the health and wellbeing of pregnant persons of colour. This would also be in line with the statutory purpose of the Healthy Start scheme.

One AFRIL member explained that her husband abandoned her and her young children, due to the extreme stress and pressures of providing for his family, with two chronically unwell children, whilst on a NRPF visa. As her status in the UK was dependent on his visa, when he left her and the children, they were without status and without income. She spoke about the immense pressure that the NRPF condition put on her family, and how they were unable to afford food after paying the rent and bills. She said she believes if her family had been able to access the Healthy Start scheme when they were still together, “this scheme would have taken a bit of the responsibility off my husband, which would have supported my family and prevented him from leaving”. She strongly felt that extending the Healthy Start Scheme to all families that meet the financial eligibility criteria, regardless of immigration status, would help to keep families together.

Question 4. "Do you agree or disagree that eligibility for Healthy Start should be extended to mothers with NRPF or who are subject to immigration controls with children under one? "

(Agree)

AFRIL, and our members believe that yes, Healthy Start should be extended to all mothers with children under 1, who meet the financial criteria regardless of immigration status. One AFRIL member explained “since having kids, I can’t let the kids be hungry”, and said that she would often go without food herself, in order to make sure that there was enough food for her children.

Another AFRIL member, an asylum seeker in receipt of Section 95 support (and so not eligible for the Healthy Start scheme) had recently given birth, and spoke to us about the difficulty in surviving on her asylum support payments with her newly born child. She explained that she relies on food banks to access food, but that she is rarely able to access fresh fruit and vegetables from the food bank, normally just “a couple of potatoes”.

She explained that the baby bank she visits gives her a box of formula milk every 3 months, however she needs one every week for her daughter, and that she has to spend £15 a week on this alone. She spoke about how after buying necessary household items, food, and travel costs, her family is unable to buy essential items like winter clothes. As asylum seekers in the UK, her family do not have the right to work, however they have been waiting several years for a decision on their asylum claim. She has applied for permission to work but has been waiting a long time for a decision on that too. She

Action For Refugees In Lewisham

F3, 2nd Floor
Leemore Central Community Hub
Bonfield Road
Lewisham SE13 5ES

Tel - 0208 297 4111

Email - info@afril.org.uk
Web - www.afril.org.uk

explained that if she had the right to work, she would willingly seek employment in order to provide for her family independently and not have to rely on the Home Office for support, but that they "can't do anything, we are stuck". She was familiar with the Healthy Start scheme but knows she is not able to access this due to her immigration status, and said if the scheme were to be extended it would be "very helpful" to her family.

Question 5. "Are there any other groups with NRPF or who are subject to immigration controls to whom eligibility for Healthy Start should be extended?"

AFRIL and our members believe that the Healthy Start scheme should be available to all families that meet the financial eligibility regardless of their immigration status. As such, eligibility should be extended to all individuals and groups who are also subject to immigration control.

Helping "the most vulnerable" and those in " the greatest need" to avoid poor health outcomes is the statutory purpose of the Healthy Start scheme, therefore in order to meet its purpose and statutory goals, the scheme needs to be extended to all families.

One AFRIL member explained to us that she had tried to apply for the Healthy Start vouchers twice; once when she was subject to immigration control (she had a British Child so was within the eligibility criteria for the ex-Gratia scheme), and again after she was granted status and was in receipt of mainstream means tested benefits. When she applied as an undocumented person she found the burden of proof she needed to submit to be much higher and more complex, and also said that being made to use a different form when applying made her feel like she had done something wrong. She said that she hopes this scheme will be extended to all families in need regardless of immigration status, and that if this happens there should be one application form for everybody applying. She felt this would also help people who were without status in the UK to feel safer when applying for the scheme; as this would make clear it is a scheme available for everybody and not a public fund.

The individuals we work with often have complex immigration statuses, which may be hard for somebody who is not legally trained to understand, due to the variety of documentation which may demonstrate somebody's status. We often see our members denied entitlements they are eligible for, due to administration staff's lack of knowledge and confidence around which documents are acceptable. In including all children into the eligibility for this scheme, issues demonstrating eligibility will be greatly reduced, which will also be easier for those administering the scheme.

Action For Refugees In Lewisham

F3, 2nd Floor
Leemore Central Community Hub
Bonfield Road
Lewisham SE13 5ES

Tel - 0208 297 4111

Email - info@afril.org.uk
Web - www.afril.org.uk

Question 6: Are there any other groups with NRPF or who are subject to immigration controls to whom eligibility for Healthy Start should not be extended?

No. There can be no reasonable basis for an eligibility criteria which denies children from the poorest families access to this scheme, therefore in order to meet its statutory purpose, the scheme should be extended to all eligible individuals/families regardless of immigration status.

Many of the families we work with, who are subject to immigration control, are being supported under section 17 of the Children Act, or are in receipt of Asylum Support from the Home Office. These payments are far lower than the amount individuals in receipt of Universal Credit receive, therefore accessing these payments should not make people ineligible for Healthy Start vouchers, so long as they demonstrate that they meet the financial eligibility criteria.

Question 7. "Do you agree or disagree that there are benefits to adding these groups to the eligibility criteria for the Healthy Start scheme?

AFRIL and our members believe that yes there are benefits to adding these groups to the eligibility criteria for the Healthy Start scheme. As already stated, the scheme must be extended to all families who fit the financial criteria, in order to meet its statutory purpose to help “the most vulnerable” or those “in the greatest need” to prevent low health outcomes.

We believe there will be an increased uptake of the scheme if it is made accessible for everybody, and will reduce or remove worries for those on a visa with a NRPF condition around implications for erroneously applying for a ‘public fund’ against the conditions of their visa. As Healthy Start vouchers can only be used to buy milk, fruit, vegetables and infant formula there is very little risk of fraudulence.

The AFRIL members we spoke to who have now begun accessing the Healthy Start scheme after previously being unable to due to their immigration status have said what a huge difference these vouchers have made to their families’ lives. One member explained how due to the cost of living, towards the end of the month she often has very little money left and struggles to make ends meet. She said for the last week of the month especially, the Healthy Start vouchers are a massive help, and ensure that her children are still able to access nutritious food and milk, and that the essentials are covered. She spoke of how previously, before she was in receipt of Healthy Start vouchers, she could only afford one bottle of milk per week, and had to carefully ration this. Now, she said her children are able to have milk whenever they want it. She said she believes “the Healthy Start scheme is really

Action For Refugees In Lewisham

F3, 2nd Floor
Leemore Central Community Hub
Bonfield Road
Lewisham SE13 5ES

Tel - 0208 297 4111

Email - info@afril.org.uk
Web - www.afril.org.uk

helping families", and that when she was not able to access these vouchers previously due to her immigration status, she "has a lot of memories she can never forget", due to the destitution and hardship her family endured.

Question 8. "Do you agree or disagree that there are challenges to adding these groups to the eligibility criteria for the Healthy Start scheme?

We do believe there will be challenges in adding these groups to the Healthy Start scheme, however these challenges can be overcome (as we will explain in the answer to the next question). There may be challenges in reaching these groups and raising awareness, however this is a challenge that can be overcome, and is far outweighed by the benefits to huge numbers of children able to access sufficient nutritious food.

Those subject to immigration control may be afraid that their data will be shared with other departments including the Home Office, and that this could negatively affect their immigration applications. To help people feel safe to apply, it should be made clear that data collected will not be shared with other departments, and there should be a firewall to ensure this does not happen.

Those who are on a visa with a NRPF condition may also be afraid that Healthy Start vouchers are a 'public fund' and that in applying to this scheme they are breaching the conditions of their visa. To increase uptake it should be made clear this benefit is not a 'public fund' and is available to all individuals regardless of immigration status. One AFRIL member suggested this could be made clear on Home Office documents to ensure transparency in accessibility. By extending eligibility for Healthy Start to all those who meet the financial criteria, there will no longer be a need to provide evidence of immigration status, which will both reassure those applying to the scheme, and make administration of the scheme simpler.

AFRIL members have cited concerns around onerous evidence of financial eligibility being needed for those not in receipt of mainstream benefits, and challenges in providing this. This challenge can be addressed by providing clear and simple guidelines on other methods of demonstrating eligibility.

Many AFRIL members, and people subject to immigration control do not have bank accounts, therefore there will need to be understanding of the types of documentation people subject to immigration control can demonstrate to prove financial eligibility.

Language barriers may also serve as a barrier, or a challenge for people to apply.

Action For Refugees In Lewisham

F3, 2nd Floor
Leemore Central Community Hub
Bonfield Road
Lewisham SE13 5ES

Tel - 0208 297 4111

Email - info@afril.org.uk
Web - www.afril.org.uk

Question 9. "Do you have any suggestions for how these challenges can be overcome?"

We have asked our members how they think these challenges could be overcome. AFRIL members who had heard of Healthy Start vouchers already, had heard of this either from healthcare professionals or through word of mouth in their community. Numerous members thought a campaign would be the best way of raising awareness and increasing uptake. They thought that GPs and midwives would be central to this, as "everybody goes to the GP, and people know they are trusted". They thought that having information available at the GP and staff who are able to advise on this, and ideally help people to apply would be the best way to raise awareness. Having midwives promote the scheme will help pregnant persons to access the scheme as soon as possible, and have the greatest impact by ensuring the child can access the benefits of this scheme right from conception.

One AFRIL member said that when she was subject to immigration control, she "was sceptical about applying and was scared to go on with the application, I thought maybe this will affect me, maybe I will have to pay it back". Making the scheme accessible to all regardless of immigration status, and clear information and transparency about financial eligibility for the scheme will help increase uptake. It will be vital to provide a guarantee that information provided when applying will not be shared with other departments, and to issue a clear statement explaining that Healthy Start is not a public fund, and can be accessed by all.

With regards to overcoming language barriers, having information online in an accessible format which can be translated using google translate can help this. Having a free helpline that individuals can call for advice and support with referrals, with interpreters available (like the NHS HC2 scheme helpline) can also help counter this.

Making sure that the scheme doesn't require impossible, onerous paperwork to apply will be crucial to ensure it is accessible. Having an advisory panel of individuals with lived experience who can advise on challenges and issues will help to overcome challenges, as will dialogue with the Voluntary and Community Sector who support these individuals.

Question 10. "Please provide any further information that you would like DHSC to consider in relation to eligibility to Healthy Start for those with NRPF or who are subject to immigration controls"

N/A

Action For Refugees In Lewisham

F3, 2nd Floor
Leemore Central Community Hub
Bonfield Road
Lewisham SE13 5ES

Tel - 0208 297 4111

Email - info@afril.org.uk
Web - www.afril.org.uk

Question 11. Do you work with families that meet the current eligibility criteria for the non-statutory scheme?

Yes

If you do, how many families would you estimate you work with that meet the eligibility criteria for the non-statutory scheme?

11-20

Question 12. Do you work with families with NRPF or who are subject to immigration controls that do not meet the eligibility criteria for the non-statutory scheme?

Yes

If you do, how many families would you estimate you work with that do not meet the eligibility criteria for the non-statutory scheme?

60-80 families annually

Please explain why these families do not meet the eligibility criteria for the non-statutory scheme (for example, non-British child or British child aged over 4 years old).

- Asylum seeking families
- Undocumented individuals
- Refused asylum seekers looking to gather fresh evidence to make further submissions
- Families with non-British children / mixed immigration status households
- Children with different fathers
- Families with a no recourse to public funds condition on their visa who are not in receipt of mainstream benefits
- Families with NRPF who are slightly over the financial eligibility but are still really struggling due to additional burdens they are facing related to their immigration status e.g. legal fees, visa renewal fees, immigration health surcharge, debt, lack of support structures

Action For Refugees In Lewisham

F3, 2nd Floor
Leemore Central Community Hub
Bonfield Road
Lewisham SE13 5ES

Tel - 0208 297 4111

Email - info@afril.org.uk
Web - www.afril.org.uk

Question 13. What effect, if any, do you think expanding eligibility would have on those who share the protected characteristic of race?

Positive effect

87.5% of the families AFRIL supported in the last 12 months that have at least one child under 4 had a child under 4 and a take home pay of under £408 were racialised/people of colour. The majority of people with a NRPF condition will be racialised individuals, and so the current eligibility of only providing Healthy Start vouchers to children who have British Citizenship is likely to exclude many other children from racialised backgrounds. Therefore, expanding eligibility to include all individuals who meet the financial criteria regardless of immigration status will have a positive impact on the protected characteristic of race.

Question 14. What effect, if any, do you think expanding eligibility would have on those who share the protected characteristic of pregnancy and maternity?

Positive effect

In the last 12 months, AFRIL has supported 98 single parent families, which account for 65% of the families we work with. A high proportion of those affected by NRPF conditions are women, and Home Office data demonstrates that there is consistently a high proportion of women who apply for a 'change of conditions' to try and get the NRPF condition lifted from their immigration status. This would imply that a significant proportion of those who are struggling with destitution related to their immigration status are women. As already highlighted, it is imperative that pregnant persons are able to receive adequate nutrition for not only their own health, but for the health and development of their child; a notion expressed in the statutory purpose of the Healthy Start scheme. Extending eligibility of Healthy Start would have a positive effect on the protected characteristic of pregnancy and maternity.

Question 15. What effect, if any, do you think expanding eligibility would have on those who share any other protected characteristics?

Positive effect

Action For Refugees In Lewisham

F3, 2nd Floor
Leemore Central Community Hub
Bonfield Road
Lewisham SE13 5ES

Tel - 0208 297 4111

Email - info@afril.org.uk
Web - www.afril.org.uk

Many of those who qualify for the financial threshold will be single mothers, therefore the current eligibility requirement has a negative impact on those who are affected by the protected characteristic of sex - women.

A significant number of AFRIL's members experience a recognised disability, these numbers are exacerbated by the national health outcomes for black and majority ethnic women. Navigating raising young children without statutory entitlements and living with a disability negatively impacts both parents, but also their children's development and educational attainment.

Question 16. What effect, if any, do you think not changing the eligibility criteria would have on those who share the protected characteristic of race?

Negative effect

As already explained, 87.5% of the families AFRIL supported in the last 12 months that have at least one child under 4 had a child under 4 and a take home pay of under £408 were racialised/people of colour. The majority of people with a NRPF condition will be racialised individuals, and so not changing the eligibility for Healthy Start vouchers will have a negative effect on those who share the protected characteristic of race, by preventing them from accessing Healthy Start vouchers, leading to lower health outcomes. Racialised individuals in the UK may already be struggling with significant social injustice and health inequalities; being unable to access Healthy Start vouchers will exacerbate this.

As a small community charity, with an in-house foodbank, AFRIL intimately understands the huge pressures faced by organisations supporting destitute migrant families. Funding for the limited projects that exist to provide healthy food to NRPF families is already tight, with need far outstripping demand. Without a systemic change the current reliance on charities is unsustainable.

Question 17. What effect, if any, do you think not changing the eligibility criteria would have on those who share the protected characteristic of pregnancy and maternity?

Negative effect

As already explained, it is imperative that pregnant persons are able to receive adequate nutrition for their own health and for the health and development of their child; a notion expressed in the statutory purpose of the Healthy Start scheme. Not changing the eligibility criteria for Healthy Start vouchers will have a negative effect on those who share the protected characteristic of pregnancy

Action For Refugees In Lewisham

F3, 2nd Floor
Leemore Central Community Hub
Bonfield Road
Lewisham SE13 5ES

Tel - 0208 297 4111

Email - info@afril.org.uk
Web - www.afril.org.uk

and maternity because it will prevent pregnant persons subject to immigration control from accessing this vital support, leading to lower health outcomes for this group.

Question 18. What effect, if any, do you think not changing the eligibility criteria would have on those who share any other protected characteristics?

Negative effect

N/A

Question 19. Please provide any further information that you would like DHSC to consider in relation to equality analysis for Healthy Start eligibility for those with NRPF or who are subject to immigration controls.

Please explain your answer (maximum 350 words).

One AFRIL member spoke about the trauma that a child can develop by receiving differential treatment from their peers, how this creates feelings of isolation and of not belonging - which can have long-term psychological impact. In her words; “kids are not different, they are all equal”, and so a child’s health and wellbeing shouldn’t be dependent on immigration status; no child should be excluded from accessing this.

Another AFRIL member told us about the hardship she faced when she was left without any means to support her young family, when her immigration status lapsed due to unforeseen circumstances. She explained whilst everyone knows it is difficult to survive without public funds, with little or no help, trying to survive in this way was extremely traumatic for her young family. She recalled how they had to queue for a long time at the local food bank every week in order to survive, sometimes in terrible weather conditions, even in the snow, and how “whatever was available was what we would eat, even if it was expired, we had to survive”. She described the impact living in such poverty had on her young children and said “this experience is a memory we will have forever, it is not something we can easily forget”. Extending the eligibility for Healthy Start vouchers to those who are financially eligible regardless of immigration status will truly have a life-changing impact on families living in poverty.