



## **Eligibility for Healthy Start for groups who have no recourse to public funds (NRPF) or are subject to immigration controls**

*This consultation response was produced by the Faculty of Public Health (FPH) in collaboration with the British Association for Child and Adolescent Public Health (BACAPH)*

### **Consultation questions**

The purpose of this consultation is to seek views on whether eligibility for Healthy Start should be extended further to include others who do not have access to public funds. DHSC is interested in receiving views from those who are subject to, or who work with those who are subject to, the following types of immigration control:

- those who require leave to enter or remain in the UK but do not have it
- those who have leave to enter or remain in the UK subject to a condition that they do not have recourse to public funds
- those who have leave to enter or remain in the UK as a result of a maintenance undertaking

In particular, DHSC welcomes views on whether Healthy Start eligibility should be extended to:

- non-British children under 4 from families with NRPF or who are subject to immigration controls
- pregnant women with NRPF or who are subject to immigration controls
- mothers with NRPF or who are subject to immigration controls with children under one

When providing your answers DHSC would like to hear about views on both elements of Healthy Start:

- the financial support to buy healthy foods
- access to Healthy Start vitamins



## Questions for all respondents

### Current eligibility for Healthy Start

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

Please explain your answer (maximum 350 words).

The UN Convention on the Rights of the Child outlines societal/government responsibilities towards children as: protection from hazards that may harm, promotion of assets to create resilience well-being, provision of services when needs arise alongside a guarantee of personal autonomy in keeping with the age and maturity of the child.

Many immigrant children will grow to become adults in the UK. Improving nutrition in early childhood will have long-term health and economic benefits. It is not equitable to deny any group of children residing in the UK access to mechanisms to improve their nutrition that are afforded to the majority.

### Extending eligibility for Healthy Start

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

Please explain your answer (maximum 350 words).

- Asylum seekers are at increased risk of food insecurity due to barriers in accessing social and economic opportunities. Research in other developed countries shows that when asylum seekers are unable to access adequate resources to buy nutritious food, they skip meals and eat food stuffs with low nutritional value. (McKay et al, 2018. Food-Based Social Enterprises and Asylum Seekers: The Food Justice Truck; Khuri et al, 2022. Dietary Intake and Nutritional Status among Refugees in Host Countries: A Systematic Review; O'Reilly et al, 2012. Nutritional vulnerability seen within asylum seekers in Australia).
- Research has shown that asylum seekers are at increased risk of reduced fruit and vegetable intake with significant consequences of malnutrition, undernutrition, and micronutrient deficiencies (Wood et al, 2021. What factors are associated with food security among recently arrived refugees resettling in high-income countries? A scoping review.)



- There are potential long-term consequences to the health of children seeking asylum due to poor nutritional intake (Mansour et al, 2020. Prevalence, Determinants, and Effects of Food Insecurity among Middle Eastern and North African Migrants and Refugees in High-Income Countries: A Systematic Review).
- A study demonstrated that child hunger was less prevalent in asylum seekers who received benefits (Sellen et al, 2002. Food insecurity among refugee families in East London: results of a pilot assessment).
- In the United States, the Women, Infants and Children (WIC) benefit scheme is available for asylum seekers and those with no recourse to other public funds. This provides a safety net for the health and wellbeing of pregnant women, infants and children from asylum seeking families who are most at risk of dietary nutritional deficits (McElrone et al, 2019. Barriers and facilitators to food security among adult Burundian and Congolese refugee females resettled in the US).
- Since August 2024, eligibility for access to Best Start Foods in Scotland has been extended to include non-British children aged under three years with no recourse to public funds.

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

Please explain your answer (maximum 350 words).

- Research has shown that asylum seekers are at increased risk of reduced fruit and vegetable intake with significant consequences of malnutrition, undernutrition, and micronutrient deficiencies (Wood et al, 2021. What factors are associated with food security among recently arrived refugees resettling in high-income countries? A scoping review.)
- Pregnant women are at increased risk of vitamin D deficiency. In addition, many of the other risk factors for vitamin D deficiency, including limited exposure to sun light (including covering skin for cultural reasons), and darker skin pigmentation are seen within the asylum seeking population, increasing their vulnerability to vitamin D deficiency during pregnancy. Healthy Start vitamins can reduce vitamin D deficiency in these women and their children.

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

Please explain your answer (maximum 350 words).

- Research has shown that asylum seekers are at increased risk of reduced fruit and vegetable intake with significant consequences of malnutrition, undernutrition, and micronutrient deficiencies (Wood et al, 2021. What factors are associated with food



security among recently arrived refugees resettling in high-income countries? A scoping review.)

- There are potential long-term consequences to the health of children seeking asylum due to poor nutritional intake (Mansour et al, 2020. Prevalence, Determinants, and Effects of Food Insecurity among Middle Eastern and North African Migrants and Refugees in High-Income Countries: A Systematic Review).
- A study demonstrated that child hunger was less prevalent in asylum seekers who received benefits (Sellen et al, 2002. Food insecurity among refugee families in East London: results of a pilot assessment).
- Women who are breastfeeding and infants are at increased risk of vitamin D deficiency. Healthy Start vitamins can reduce vitamin D deficiency in these women and their children.
- Since August 2024, eligibility for access to Best Start Foods in Scotland has been extended to include non-British children aged under three years with no recourse to public funds.

## Extending eligibility for Healthy Start: other groups

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

- Don't know

Please explain your answer (maximum 350 words).

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

Please explain your answer (maximum 350 words).

It is not equitable to deny any group of children residing in the UK access to mechanisms to improve their nutrition that are afforded to the majority.

## Benefits and challenges of extending Healthy Start

We are interested in views on the benefits and challenges of adding the following groups in to the eligibility criteria for Healthy Start:

- non-British children, under 4, from families with NRPF or who are subject to immigration controls
- pregnant women with NRPF or who are subject to immigration controls
- mothers with NRPF or who are subject to immigration controls with children aged under one



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

- Agree

Please explain your answer (maximum 350 words).

- Improved equity of access to vitamins and healthy food, including increased fruit and vegetable intake for pregnant women, and children.
- Potential for reduced demand on healthcare services as a result of improved nutrition of pregnant women and young children.
- Wider impacts on wellbeing, mental and physical health have been evidenced through other schemes open to those with NRPF, such as the Rose Voucher Scheme.

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

- Don't know

Please explain your answer (maximum 350 words).

It is important that people seeking asylum can access benefits without this impacting on their asylum status. This is possible, as demonstrated by the recent change (August 2024) to the Scottish Government Best Start Foods being extended to non-British children under 3 years.

If you agree, do you have any suggestions for how these challenges could be overcome (maximum 350 words)?

## **Any further information about eligibility**

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 (maximum 350 words).

## **Further questions for individuals**

Do you meet all the current eligibility criteria for the Healthy Start non-statutory scheme?

- Yes
- No
- Don't know

You meet the criteria if all of the following are true:

- you have one or more British children who are aged under 4 years old
- your take-home pay is £408 or less per month



- you cannot claim public funds because of your immigration status (by this we mean you have a NRPF condition) or because you do not have an immigration status (you are in the UK without permission)

If you said no, please explain why you do not meet the eligibility criteria (maximum 350 words).

## Further questions for professionals or organisations

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

- No

They are eligible if all of the following are true:

- they have one or more British children who are aged under 4 years old
- their take-home pay is £408 or less per month
- they also cannot claim public funds because of their immigration status (by this we mean they have a NRPF condition) or because they do not have an immigration status (they are in the UK without permission)

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

- 10 or fewer
- 11 to 20
- 21 to 30
- 31 to 40
- 41 to 50
- More than 50

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?

- No

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

- 10 or fewer
- 11 to 20
- 21 to 30
- 31 to 40



- 41 to 50
- More than 50

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) (maximum 350 words).

## Equality analysis

The Secretary of State must comply with their obligations under the [Equality Act 2010](#) and specifically the [public sector equality duty \(PSED\)](#).

PSED covers the following protected characteristics:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (ethnic origin)
- religion and belief
- sex
- sexual orientation

PSED requires public authorities, in the exercise of their functions, to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Equality Act 2010
- advance equality of opportunity between people who share a protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not

We are particularly interested in how the Healthy Start scheme affects NRPF families or families subject to immigration controls with protected characteristics (especially race or ethnic origin, pregnancy and maternity) and what effects any changes would have on NRPF families or families who are subject to immigration controls.



## Equality analysis: extending Healthy Start to include certain groups

The following questions seek your views on whether changing the eligibility criteria for Healthy Start to include certain groups with NRPF or who are subject to immigration controls will affect those with:

- the protected characteristic of race
- the protected characteristic of maternity and pregnancy
- any other protected characteristics

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

- Positive effect

Please explain your answer (maximum 350 words).

Current inequity in access to vitamins and healthy food is based on nationality or citizenship. The proposed change to the eligibility criteria would have a positive effect in relation to the protected characteristic of race.

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

- Positive effect

Please explain your answer (maximum 350 words).

Women who are pregnant or breastfeeding are at increased risk of vitamin D deficiency. Extending the eligibility as proposed would have a positive effect in relation to the protected characteristic of pregnancy and maternity through access to Healthy Start vitamins.

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

- Positive effect

Please explain your answer (maximum 350 words.)

Reasons cited for seeking asylum include avoiding persecution for religious beliefs and / or sexual orientation. Two characteristics that also lie within the Equality Act legislation. There is potential to have a positive impact on these protected groups.

## Equality analysis: not extending Healthy Start

The following questions seek your views on whether not changing the eligibility criteria for Healthy Start to include certain groups with NRPF or who are subject to immigration controls will affect those with:

- the protected characteristic of race





- the protected characteristic of maternity and pregnancy
- any other protected characteristics

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

Please explain your answer (maximum 350 words).

Current inequity in access to vitamins and healthy food is based on nationality or citizenship. Not making the proposed changes to the eligibility criteria would maintain the negative effect in relation to the protected characteristic of race.

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

Please explain your answer (maximum 350 words).

Women who are pregnant or breastfeeding are at increased risk of vitamin D deficiency. Not extending the eligibility as proposed would have a negative effect in relation to the protected characteristic of pregnancy and maternity through limiting access to Healthy Start vitamins.

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

- Negative effect

Please explain your answer (maximum 350 words).

Reasons cited for seeking asylum among others include, avoid persecution in their own country for religious beliefs and or sexual orientation. Two characteristics that also lie within the Equality Act legislation. As such there is potential there to have a positive impact on these protected groups.

## **Equality analysis: other information**

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 (maximum 350 words).

DHSC should consider how they can remove the variance of value and purchasing power of Healthy Start vouchers to provide consistency for parents by extending the £8.50 weekly value to eligible children until age five years and increasing the value annually in line with inflation.