



Project 17

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Healthy Start Consultation – guidance for individuals responding.

The Department for Health and Social Care (DHSC) has launched a consultation asking for opinions on whether eligibility for Healthy Start vouchers 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 and access to Healthy Start vitamins."

We understand that it can be daunting to fill in this kind of online survey and that many have limited access to devices that allow them to fill in long online forms. We have therefore copied the questions into this handy guide which you can download and look at and think about your answers before you start. We have also provided some suggested answers and guidance on the kind of information that we think it would be helpful to include under each of the questions – however, these are just suggestions to help guide you and you can answer the questions in any way you feel is right. The most influential information you can provide will be testimony of the impact that having, or not having, access to Healthy Start has had on you, your children and your family. Your experience is the best evidence you can provide, it does not need to be technical. So please speak from the heart and share as much information as you feel comfortable with.

The survey is anonymous and you do not need to provide information that identifies you.

The link to filling in the form is here:

<https://consultations.dhsc.gov.uk/669e6b75d3d588df2e0015f5>

The first question when accessing through the above link is:

Question 1. "In what capacity are you responding to this survey:

- An individual sharing my personal views and experiences
- An individual sharing my professional views
- On behalf of an organisation"

Select the appropriate option (for most people with lived experience this will be option 1)

Question 2. Next question asks for information on your age, sex, gender (fill in as appropriate)

Question 3. Next question(s) asks about ethnic group (fill in as appropriate)

Question 4. Next question(s) asks where you live in the UK (fill in as appropriate)

All the information required up to this point is anonymised information to understand general characteristics of who is filling in the survey - none of the information identifies you as an individual. The next question asks if you want to share your email address with the Department of Health and Social Care – It is up to you if you want to provide this information or not and there is no requirement that you do so.

Question 5. "Are you happy to share your email address with the Department of Health and Social Care?"

If you answer yes – the form will take you to a page where you can fill in your email address and then on to the first question in the consultation.

If you answer no - the form will take you to the first question in the consultation.

Questions for the main consultation:

Current eligibility for Healthy Start

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?"

Possible answers:

- Agree

- Neither agree nor disagree
- **Disagree (suggested response)**
- Don't know

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful for you to provide information on:

[We believe that all children in families that meet the financial eligibility criteria should be able to access nutritious food regardless of their parents immigration status. It would be helpful to hear about the impact of being excluded from accessing benefits by having no recourse to public funds (either as a condition on your visa or due to not having a regularised immigration status) on your ability to provide nutritious food for yourself and your family.

For those currently accessing the ex-gratia scheme: it would be helpful to comment on how easy or hard you found it to access the scheme, what was your family's experience before being able to access the Healthy Start vouchers (e.g. was there things you had to do without and what was the impact on you, your children and the whole family), and how has this experience changed now that you can access the scheme. Based on your experience, what do you think the impact of being excluded from the scheme is for other families with NRPF?

For those eligible but not currently accessing scheme: It would be helpful to hear more about why you are not currently accessing the scheme - e.g helpful to comment on lack of awareness, how no one told you you would access, difficulty with application process, and providing required evidence, fear of giving information to authorities etc

For those not currently eligible: it would be useful to hear about how you family struggles to provide nutritious food for your children, the sacrifices you have to make to make sure they get adequate food, your worry about your children, how unfair it feels that your children cannot access this benefit, how you worry about long term impact of being denied nutritious food on your children etc

For those with mixed eligibility (e.g. one British child under 4 and one non-British child under 4): it would be helpful to comment on how that makes you feel, knowing that one child is considered deserving of nutritious food and not the other simply because of their nationality. It would be helpful to hear about how you deal with that - e.g. sharing the food between kids so both get some but no one gets enough etc.]

Extending eligibility for Healthy Start

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?"

Possible answers:

- **Agree (suggested answer)**
- Neither agree nor disagree
- Disagree
- Don't know

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

[We believe that all children in families that meet the financial eligibility criteria deserve to be able to access nutritious food regardless of their parents immigration status.

It would be really helpful to hear about your family's experience. It would be helpful to hear about the impact of being excluded from accessing benefits by having no recourse to public funds (either as a condition on your visa or due to not having a regularised immigration status) on your ability to provide nutritious food for yourself and your family. How you have struggled to access nutritious food for your children, the impact this has had on you and your family - short term and long term. the sacrifices you have had to make to put food on the table - and sometimes not being able to put the kind of food you want to on the table - e.g. fast food being cheaper, food banks not giving out fresh vegetables and milk etc

If you have been able to access Healthy Start vouchers: it could also be helpful to hear about how this has changed things for you and your children - and this is why it should be extended to all children who meet financial criteria regardless of their parents immigration status. Children are children and all children deserve a good start in life regardless of their nationality and their parents immigration status.

If you have one child who has been able to access the scheme because of their British nationality and other children who have not been able to access as they hold another nationality it would be helpful to hear about how this has affected them and you as a family.]

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?"

Possible answers:

- **Agree (suggested answer)**
- Neither agree nor disagree
- Disagree
- Don't know

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

[It would be helpful to hear about any personal experiences you had whilst pregnant - of difficulty in accessing nutritious food etc and any worries this caused you about your babies

health and your own health. You can also speak about the experiences of friends and people around you as long as you do not give any personal details without their consent.

It would be helpful to hear about the impact of being excluded from accessing benefits by having no recourse to public funds (either as a condition on your visa or due to not having a regularised immigration status) on your ability to provide nutritious food for yourself whilst pregnant. If you were charged for maternity services it would be helpful to hear about the impact of this debt on your ability to provide nutritious food for yourself and your family. Finally, it would be helpful to hear what kind of difference you think it would have made to you (and your family) if you had access to Healthy Start vouchers - and therefore why you believe it would be important for other people with NRPF to have access to these vouchers during pregnancy.]

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? "

Possible answers:

- **Agree (suggested answer)**
- Neither agree nor disagree
- Disagree
- Don't know

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

[It would be helpful to heard about sacrifices you had to make with your own nutrition in the first year of your child's life - worrying about or problems with maintain good nutrition for yourself when breastfeeding - or just in general and any impact you think this had on your mental and physical health and ability to take care of yourself and your children during this time. If you think it would have been helpful to have access to Healthy Start vouchers, tell them how you think this would have benefitted you and your family and others with NRPF and a child under one.]

Extending eligibility for Healthy Start: other groups

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?"

Possible answers:

- **Yes (suggested answer)**
- No
- Don't know

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

[Yes. All children in families that meet the financial eligibility criteria should be able to access nutritious food regardless of their parents immigration status.]

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?"

Possible answers:

- Yes
- **No (suggested answer)**
- Don't know

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

[No. All children in families that meet the financial eligibility criteria should be able to access nutritious food regardless of their parents immigration status.]

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

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

Possible answers:

- **Agree (suggested answer)**
- Neither agree nor disagree
- Disagree
- Don't know

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

[If you have accessed Healthy Start vouchers: - then tell them about the benefits the vouchers have provided for you and your family and children. Short term and long term. And why you think all children deserve to have access to these benefits.

If you have not accessed Healthy start vouchers: - tell them of the struggles you have faced, and how you know others are facing the same, and how you think your children and all children in families who meet the financial eligibility criteria deserve to benefit from nutritious food regardless of their nationality or immigration status.

Can also talk about, in your own words, how important you think nutritious food is for the health and wellbeing of children and how children are the future - so making sure children have a good start in life benefits us all.]

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

Possible answers:

- **Agree (suggested answer)**
- Neither agree nor disagree
- Disagree
- Don't know

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

[Here it would be really helpful to hear about some of the challenges you can think of as a person subject to immigration control - based both on your own experience and the experience of people around you. Some examples of challenges I can think off at the top of my head might be e.g.: lack of awareness of the scheme and eligibility; fear that information will be shared with Home Office or other departments; not wanting to be seen to take advantage of the system; worried about breaching the conditions of your visa if you have a NRPF condition; language barrier; not having access to a computer to fill in long forms; struggling with filling in forms; difficulty gathering all the evidence they ask for etc - please add anything you can think of, based on your experience and those around you.]

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

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

As above

[Here it would be good to talk about things that would have made it easier for you to access the Health Start voucher scheme - beyond extending the eligibility criteria. Thinking of some of the challenges you mentioned in the previous question, what could have reduced these? e.g.

- making sure people are aware of the scheme - getting the word out to migrant communities and mainstream healthcare professionals who do the referrals

- making sure that the scheme does not require impossible paperwork to apply
- provisioning a guarantee that the information provided will not be shared with other departments
- clear statement that Healthy Start is not a public fund, that it can be accessed by all and will not put anyones conditions of leave at risk
- providing information in a number of languages and having access to interpreters for referral and explaining scheme
- providing help with filling in forms and providing access to a computer for this purpose at public hubs, like libraries or GP offices
- making sure that healthcare professionals know that everyone can and should access the scheme if they meet the financial eligibility criteria
- not rely on accessing benefits as a determinant of low income as this excludes many with NRPF. Understanding that many may not be able to provide copies of payslips or bank accounts in their own name to demonstrate low income as many do not have the right to work and open bank accounts.
- establish a panel of people with lived experience who can advise on issues around access, structural injustices, inherent racism and barriers to accessing the support - and work to find innovative ways of circumnavigating these....
- lots of other things that may have been helpful to you in accessing support - little or large...]

Any further information about eligibility

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"

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

[Here you can mention anything else that you have not been able to say in the previous categories....

This may be a good place to explain the impact of NRPF on your family. For example how many people without recourse to public funds are earning a low income but cannot access benefits which mean that they often have to survive on less than families who can access benefits. It may be helpful to speak about how this affects the family on a daily basis - having to go without essentials, struggling to cover school uniforms, clothes, heating and food for the family without being able to rely on benefits. If this has led the family to take on debt from friends and family or community lenders or if this has resulted in having to work in exploitative and precarious workplaces to try to make ends meet. It may also be helpful to talk about other effects of NRPF such as not being able to access extended subsidised childcare which limits how much parents can work which further limits income. In addition the high cost of visa fees, Immigration Health Surcharge and legal representation, existing

debt including healthcare charges (particularly maternity charges) affect our ability to provide a nutritious diet to our kids.

This evidence can help the people making the rules understand how hard everyday survival is for people with NRPF who are at the same time barred from the safety net of benefits to help them. Healthy Start is one of the things that could help with this for young children, pregnant women and recent mothers.]

Further questions for individuals

Question 11. "Do you meet all the current eligibility criteria for the Healthy Start non-statutory scheme?"

(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)

Possible answers: **(you will need to fill this in according to your own personal circumstances but all the answers are anonymous).**

- Yes
- No
- Don't know

Question 12. "If you said no, please explain why you do not meet the eligibility criteria "

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

[please fill in according to your own circumstances - e.g. this may be because you do not have a British child, or you are an asylum seeker or you may not have been able to demonstrate your eligibility or financial income or anything else that excludes you from Healthy Start vouchers under the current scheme.]

Equality analysis

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"

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

Possible answers:

- **Positive effect (suggested answer)**
- Neither positive nor negative effect
- Negative effect
- Don't know

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

[The majority of people with NRPF will be racialised individuals - who are already struggling with the structural injustices, racism and health inequalities that are well documented in our society. Barring people from accessing a social security safety net (NRPF policy) is part of the so-called hostile environment policies intentionally designed to punish migrants and racialised communities. The current eligibility criteria for the Healthy Start vouchers - which are linked to accessing benefits (and holding a British passport) - is excluding many people with NRPF who are both some of the poorest in the UK as well as often people of colour or from racialised communities. The current eligibility criteria for Healthy Start vouchers is contributing to further these racist policies by holding children's nutrition hostage to their nationality and parents' immigration status. This may be resulting in further discrimination towards children from racialised communities and prevents the scheme from helping many of the children in the UK who are living in poverty and struggling with accessing nutritious food - exactly the children/families the Healthy Start scheme was set up to help. Expanding the eligibility to all children in families who meet the financial eligibility criteria regardless of their immigration status would go some way to reversing this discrimination and have a positive impact on those who share the protected characteristic of race.

If this is relevant to you, please provide any information or examples of how these racist policies have affected you and your family and how giving more children access to healthy start vouchers would help families like yours.]

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

Possible answers:

- **Positive effect (suggested answer)**
- Neither positive nor negative effect
- Negative effect
- Don't know

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

[Government statistics shows that a significant proportion of those struggling with destitution as a result of the NRPF policy (and who are eligible to make a CoC application) are women. as above these are likely to be women of colour. Not only are migrant women subject to the structural injustices related to race outlined above but they are also further disadvantaged by inherent inequality of our patriarchal society. E.g. women are likely to take on most of the child care responsibility but do not have access to the same subsidised childcare as women who have recourse to public funds. This may be resulting in further discrimination towards women from racialised communities and prevents the scheme from helping many of the pregnant women, new mothers and children in the UK who are living in poverty and struggling with accessing nutritious food - exactly the children/families the Healthy Start scheme was set up to help.

It is women who are charged for maternity services and saddled with this debt, regardless of the nationality of the father, women are frequently in lower paid jobs, and the time around pregnancy and birth is often a precarious time in relationships and may put existing housing situations at risk. Therefore, expanding the eligibility for Healthy Start vouchers would lead to improvements for people who share the protected characteristics of pregnancy and maternity.

It would be helpful to have information and examples of who the above things affected you and your family during pregnancy and early motherhood - and in particular how this was impacted by the NRPF policy. If you were able to access Healthy Start vouchers, information about how this helped you and your family. If you could not access Healthy Start vouchers, how this support would have been helpful for you and other women in your position.]

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

Possible answers:

- **Positive effect (suggested answer)**
- Neither positive nor negative effect
- Negative effect
- Don't know

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

Please explain your answer (maximum 350 words). - something in disability but need to think about this

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

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?"

Possible answers:

- Positive effect
- Neither positive nor negative effect
- **Negative effect (suggested answer)**
- Don't know

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

[As set out above - this would continue to contribute to further excluding the racialised population already struggling with significant social injustices and health inequalities - with negative consequences for the life expectancy and health and wellbeing of children in these communities.]

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?"

Possible answers:

- Positive effect
- Neither positive nor negative effect
- **Negative effect (suggested answer)**
- Don't know

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

[As set out above - not making changes would continue to contributing to the inequalities of the patriarchy and significant social injustices and health inequalities suffered by women - not least the fact that the health system charges women subject to immigration control for maternity care - which further adds to the financial burden and stress on new mothers and pregnant persons.]

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

Possible answers:

- Positive effect
- Neither positive nor negative effect
- **Negative effect (suggested answer)**
- Don't know

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

[As above a negative impact on those with the protected characteristic of sex - as many of those likely to qualify for the financial threshold are women - often single mothers.]

Equality analysis: other information

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"

Consultation provides space for people to fill in comments explaining their answers (up to 350 words). We suggest it would be helpful to provide information on:

[please add any information, examples or comments you did not cover in the above answers.]

Final sections...

Lastly, the survey will present you with a summary of your answers and then bring you to some questions about how you heard about the consultation and how satisfied you are with the process. complete these and then, **IMPORTANTLY**, you must press **SUBMIT** and then your answers will be submitted and will be considered as part of the consultation process.

Thank you for taking the time to share your experiences and hopefully, together, we can lead the Department of Health and Social Care to make the right decision and provide all children in low income families with a nutritional safety net - regardless of their immigration status!!!

