

Eligibility for Healthy Start (England, Northern Ireland & Wales) - consultation response

Extending eligibility for Healthy Start

The Royal College of Paediatrics and Child Health (RCPCH) welcomes the extension of the Health Start scheme to non-British children aged under 4 from families with no recourse to public funds (NRPF) or who are subject to immigration controls. The RCPCH also encourages UK Government to [extend the Healthy Start scheme to pregnant people and mothers with NRPF](#) or who are subject to immigration controls with children under one. The College would encourage making the vouchers permanently available to all children, including children seeking asylum in a simple and accessible way that does not impact asylum claims.

The College also encourages the DHSC to streamline the application process, making it more accessible and consistent, and to consider implementing auto-enrolment or an opt-out system to increase uptake.

Do you agree or disagree with the current eligibility criteria for Healthy Start?

Disagree

The scheme is valuable in helping vulnerable families, but there are some areas where eligibility could be expanded or improved to better meet the needs of certain groups.

RCPCH believe that the current eligibility criteria for Healthy Start is effective in targeting low-income families and vulnerable groups, however we disagree with the exclusion of families with NRPF.

One of the major gaps in the current eligibility criteria is the exclusion of families with NRPF, including many migrants and those under immigration controls. These families often experience extreme poverty and food insecurity but are barred from accessing Healthy Start because they are not eligible for the qualifying benefits. In May 2021 DHSC did temporarily expand the eligibility of healthy start to some families with NRPF, demonstrating it's possible and makes a positive impact, and therefore should not be reversed and instead be made permanent and extended to all those with NRPF.

The RCPCH puts children at the core of everything we do, and we believe the wellbeing of children, regardless of their parents' immigration status, should be prioritised, and excluding these families' risks increasing health inequalities.

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

The extension of the Healthy Start scheme to children aged under 4 from families with NRPF or who are subject to immigration controls will allow more vulnerable children access to nutritious food. Currently, children and adolescents in the UK typically have suboptimal diets, and children from lower socio-economic backgrounds are more likely to face barriers in accessing healthy food, leading to diets that meet fewer UK dietary recommendations.

The Healthy Start scheme supports wider government priorities on preventing childhood obesity and reducing inequalities, two areas RCPCH continuously campaign for. Healthy eating is vital for children's development and educational attainment and sets the direction for good health and wellbeing throughout the life course. Access to healthy food forms a solid foundation for future health. The right nutrition and care during the 1000 day window influences not only whether the child will survive, but also his or her ability to grow, learn and rise out of poverty.ⁱ

The lack of secure access to nutritious food can result in malnutrition and increase the risk of children being underweight or overweight.

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

The RCPCH recommends extending the Healthy Start scheme to pregnant people with NRPF or who are subject to immigration controls with children under one, as maternal health is vital to the outcomes of children, especially in their early years.

Unborn children should not suffer due to their parent's immigration status. Ensuring that pregnant people, regardless of their legal status, have access to nutritious food and vitamins is crucial for the health and development of the child. Poor antenatal nutrition can lead to low birth weights, developmental issues, and long-term health problems for the baby.ⁱⁱ

Healthy Start aims to give children the best possible start in life, and excluding some pregnant people based on immigration status undermines this goal. The most cost-effective impact on health across the life course is in childhood, starting from pregnancy. When political focus is on treatment rather than prevention, the cost to society soars. Data also shows that maximising maternal health and wellbeing during and after pregnancy improves child health outcomes.ⁱⁱⁱ

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

The RCPCH agree that eligibility for Healthy Start should be extended to mothers with No Recourse to Public Funds (NRPF) or who are subject to immigration controls with children under one.

Extending Healthy Start eligibility to mothers with NRPF or under immigration controls with children under one would promote child welfare, reduce inequalities, and support better long-term health outcomes for vulnerable infants. Data consistently show that poverty and inequality impact a child's whole life, affecting their education, housing and social environment and in turn impacting their health outcomes.^{iv} By extending the Healthy Start Scheme to mothers with NRPF or who are subject to immigration controls with children under one will positively impact that child's life into adulthood. RCPCH would additionally suggest that the Health Start eligibility is extended to **all** parents with NRPF with children under one.

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

The RCPCH believes there are other groups with NRPF or who are subject to immigration controls to whom eligibility for the Healthy Start scheme should be extended. These groups are also likely to experience financial hardship and food insecurity, making access to the scheme crucial for the health and wellbeing of their children.

Some individuals subject to immigration control may be in receipt of other support - asylum support or support under section 17 of the Children Act – however the College believe accessing such support should not make people ineligible for Healthy Start vouchers.

The College urge you to extend the Healthy Start Scheme to Families Seeking Asylum or Refugee Status and those with Limited Leave to Remain (LLR). These groups are highly vulnerable due to their limited or no access to public funds, making it difficult for them to meet their children's basic nutritional needs. Extending Healthy Start eligibility to these groups aligns with our values as a College and our broader goals of reducing childhood inequalities, protecting child welfare, and preventing long-term health problems.

Benefits and challenges of extending Healthy Start

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

Agree

The RCPCH agree that there are benefits to adding families with NRPF to the eligibility criteria for the Healthy Start scheme. The primary aim of the Healthy Start scheme is to improve the health and nutrition of vulnerable children. Excluding families with NRPF from the program contradicts this, as their children are likely to be equally, if not more, vulnerable to food insecurity due to their lack of access to public funds. Including families with NRPF in the scheme will also help reduce inequalities.

Poor childhood nutrition has long-term consequences. RCPCH's Poverty and child health report (2017)^v, found that several paediatricians observed that poor nutrition as a result of the inability to afford enough healthy food is associated with both poor growth of deprived babies and children on the one hand, and rising child obesity on the other.^{vi} By allowing NRPF families to access the Healthy Start scheme, the government can reduce future healthcare costs through prioritising public health, prevention and early intervention.

Including these groups would ensure that pregnant people and young children receive essential nutrition, which is crucial for healthy foetal development and the well-being of young children. The RCPCH wholeheartedly believes there are huge benefits to adding these groups to the Healthy Start scheme.

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

Agree

The RCPCH agree there could be potential challenges to adding these groups to the eligibility criteria.

Research shows there is insufficient information available on the Healthy Start Scheme. Many eligible families, particularly those from low-income backgrounds or vulnerable groups, are simply unaware of the scheme's existence.

The application process is complex and for families from migrant or ethnic minority backgrounds, particularly those who are non-native English speakers, may struggle to understand an already complicated application process.

The College would also urge DHSC to make the application process more consistent, easier to access and consider auto-enrolment or an opt-out process to increase uptake.^{vii} Overcoming these challenges also requires improving outreach, expanding digital access and support and ensuring that migrant families and vulnerable groups feel safe and informed about their eligibility and rights.^{viii} In the recent State of Health Visiting, 2022 UK survey report, findings show only 7% of health visitors in the UK felt confident that all families would be able to access the support they needed when a problem was identified.^{ix}

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

Positive effect

Ethnic minorities are disproportionately represented among those with NRPF or under immigration controls. Expanding eligibility would help reduce health disparities for these groups, many of whom are at greater risk of food insecurity and poorer health outcomes.

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

Positive effect

The RCPCH believe there would be significant positive effects on those who share the protected characteristic of pregnancy and maternity. Ensuring that these people have access to nutritious food can reduce the risk of complications during pregnancy, such as anaemia, pre-eclampsia and haemorrhages.^x

The Healthy Start scheme supports the health of newborns by providing nutritional assistance to mothers and babies. Expanding eligibility would ensure that mothers with NRPF can provide essential nutrition for their children in the crucial early months of life, where nutrition plays a key role in babies overall health.

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

Positive effect

For many people who share other protected characteristics, such as disability, we know that the risk of poverty, and therefore food scarcity, is higher^[10]. Therefore, expanding eligibility is likely to have a very positive effect on all people with NRPF who share any other protected characteristic.

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

If the eligibility criteria for the Healthy Start scheme remain unchanged, it could have negative effects on individuals who share the protected characteristic of race, particularly for ethnic minority and migrant communities. It would perpetuate health inequalities and reinforce socioeconomic barriers faced by ethnic minorities.

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

The RCPCH believe if the eligibility criteria for the Healthy Start scheme remains unchanged, it could have negative effects on individuals who share the protected characteristic of pregnancy and maternity, as the scheme would continue to exclude vulnerable people from accessing critical nutritional support.

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

Negative effect

If the eligibility criteria remains unchanged, it could negatively impact several groups that share protected characteristics under the Equality Act 2010, as outlined in our previous answers

About the RCPCH

The Royal College of Paediatrics and Child Health (RCPCH) is responsible for training and examining paediatricians, setting professional standards and informing research and policy. RCPCH has over 22,000 members in the UK and internationally. We work to transform child health through knowledge, research and expertise, to improve the health and wellbeing of infants, children and young people across the world.

Our key areas of work include:

- Training, exams and professional development – we are responsible for the postgraduate training of paediatrics in the UK, provide career support and run the membership (MRCPCH) and Diploma of Child Health examinations.
- Improving child health – we aim to improve outcomes through research, standards, quality improvement and policy in the UK and globally. We aim to ensure the voice of children, young people and families in our programmes.
- Member services – we support our members with a package of unique benefits. These include access to multidisciplinary educational programmes, including face-to-face courses and e-learning resources.
- News and campaigns – we engage with the media, government, NHS, charities and other stakeholders, working across the UK (Scotland, Wales, Ireland and England).

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ⁱ <https://www.unicef.org/southafrica/media/551/file/ZAF-First-1000-days-brief-2017.pdf>

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<https://www.unicef.org/nutrition/maternal#:~:text=During%20pregnancy%2C%20poor%20diets%20lacking,and%20developmental%20delays%20for%20children.>

ⁱⁱⁱ <https://stateofchildhealth.rcpch.ac.uk/evidence/maternal-perinatal-health/>

^{iv} <https://stateofchildhealth.rcpch.ac.uk/key-priorities/prioritise-public-health-prevention-and-early-intervention/>

^v <https://www.rcpch.ac.uk/resources/poverty-child-health-views-frontline>

^{vi} <https://www.rcpch.ac.uk/sites/default/files/2018-04/poverty20and20child20health20survey20-20views20from20the20frontline20-20final2008.05.20171.pdf>

vii <https://www.fph.org.uk/media/r2lh03yb/good-food-for-children-2-page.pdf>

viii Healthy Start Working Group policy positions (Sustain, March 2023)

ix [RCPCH responds to State of Health Visiting, 2022 UK survey report | RCPCH](#)

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<https://www.unicef.org/nutrition/maternal#:~:text=During%20pregnancy%2C%20poor%20diets%20lacking,and%20developmental%20delays%20for%20children.>