



# KALAYAAN

justice for migrant domestic workers

2 December 2020

Matt Hancock MP  
Secretary of State Secretary of State for Health and Social Care

Nadhim Zahawi MP  
Parliamentary Under Secretary of State (Minister for COVID Vaccine Deployment)

Kevin Foster MP  
Minister for Immigration

Victoria Atkins MP  
Minister for Safeguarding

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Dear Sir / Madam,

## COVID-19 Concerns Migrant Domestic Workers and the Vaccine Programme

We are writing in light of recent developments, to highlight some issues with respect to how the roll out of any vaccine programme will be promoted and implemented, as we wish to ensure that the unique circumstances of migrant domestic workers are not overlooked, thereby excluding them from access.

The recent announcements regarding potential vaccines are most welcome developments. We appreciate the government's efforts to ensure the UK is at the forefront to secure access to the different vaccines, as and when they become available. There have been reports that the vaccine programme could begin roll out as early as December this year. In light of this, we are keen to flag up issues which would affect the client group for whom we advocate.

We understand that to combat the COVID-19 public health crisis it is essential that everyone within the UK is vaccinated against it. We are concerned that an individual's immigration status must not be a bar to accessing the vaccine. We note that to date the government has made it clear that overseas visitors to England, including anyone living in the UK without permission, will not be charged for COVID-19 testing and treatment. We are concerned that there should also be clear messaging with respect to the vaccine programme.

We understand that efforts to roll out the vaccine programme are under consideration, and that general practice will lead delivery.<sup>1</sup> Although we note that government, in particular the Home Office, will understand the plight of migrant domestic workers and will be familiar with

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<sup>1</sup> <https://www.bma.org.uk/advice-and-support/covid-19/gp-practices/covid-19-vaccination-programme>

the issues we raise, to ensure the vaccine programme is effective, messaging to general practitioners and/ vaccine centres must address a number of issues which affect migrant domestic workers, head on, as local general practitioners will be the gate keepers to access, and therefore must also understand the position of migrant domestic workers.

We are of the view that it is essential that government's messaging to the public and also general practice provides clarity with respect to a number of issues:

1. Who is entitled to the vaccine?
2. How people can have access to the vaccine?
3. What, if any, documentation will be required to access the vaccine?

### *Eligibility for the Vaccine*

We are of the view that the government must state explicitly, in publicity material regarding the vaccine programme, that anyone in the UK will be eligible for the vaccine whether they are resident in the UK legally or illegally, and that everyone is eligible to register with a GP. Clear messaging addressing these points is vital to encourage an increased uptake of the vaccine.

We understand that the government currently intends to roll out the vaccine on the basis of age. However once those under the age of 50 are being vaccinated, we would ask that some consideration be given to prioritising the vaccination of individuals living in crowded, shared accommodation, because of the greater risk of infection and the difficulty for those infected to self isolate, when living in such conditions.

### *Registration to General Practice*

We understand that it is likely that people will need to register with their local general practice to access the vaccine. We would ask that the government ensure that it is made clear to GPs and patients, when promoting any vaccine programme, that there is no regulatory requirement to prove identity, address, immigration status or provide an NHS number in order to register. <sup>2</sup>

We often receive reports from clients that they have been wrongly turned away from their local general practice, when attempting to register with them, because they do not have the aforementioned information or documents available. There is clearly widespread misunderstanding within general practice about the requirements to register, details of which are buried in primary care policy and guidance manuals.

We are concerned that as a consequence of the government's hostile environment policies, requiring documentary evidence has become normalised. It has become common practice for these details to be requested/ required even when they are not necessary. We would request that the government actively address this issue by widely publicising the correct position.

It is very important that the government makes clear to general practitioners that they will not be required to check a person's immigration status when registering or checking eligibility for the vaccine.

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<sup>2</sup> <https://www.nhs.uk/using-the-nhs/nhs-services/gps/how-to-register-with-a-gp-practice/>

If vaccinating centres are created, the requirements to register with these centres should not differ from those placed on general practice.

### *Documentation*

We would request that the government does not make the provision of identity documents, a prerequisite to accessing the vaccine, whether this is at general practice or a vaccine centre, as many of those we help are unable to do so.

It is important to understand the practical reasons why migrant domestic workers find themselves unable to provide such documentation. A significant proportion of migrant domestic workers are victims of trafficking and modern slavery. Many do not have their passports and identity documents because they are retained by their employer, as a means of exercising control over their workers, which enables them to exploit their staff.

Many migrant domestic workers will have identity documents which are no longer valid because they have become overstayers. We hear reports that people will overstay before seeking help because they are not aware of the protections available to them and they are fearful of the consequences of approaching the authorities, in case they are in fact punished for escaping from their employers. As a result, a significant number of the cohort we assist are in the UK illegally and/ without documentation by the time they have first approached Kalayaan or the authorities for help.

Even when our clients do obtain assistance, many will continue to live in precarious circumstances residing on an ad hoc basis with friends, moving from place to place, if it means they can stay with someone they are familiar with. However, this often means that they cannot provide proof of address, as they do not have a tenancy agreement or utility bills in their name.

We raise our concern about documentation as we are aware that some type of identity verification may be requested as part of the vaccine programme. We note that to receive a COVID home test kit, the Department for Health and Social Care, have been using a credit reference agency, TransUnion, to verify people's identities. As a consequence, people in the UK without a credit history were unable to access a home test kit.<sup>3</sup> We are concerned that accessing the COVID vaccine should not be made more difficult for migrant domestic workers because of their circumstances. Providing documentation or checking their credit history to verify their identity should not be necessary in this programme, given that it is not necessary for the purposes of registering with a GP. Such requirements will create an unnecessary barrier to the vaccine and possibly act as a deterrent.

### *Data Sharing with the Home Office*

We would ask that the government makes it explicitly clear that any data collated for the purpose of rolling out this programme and administering the vaccine will not be shared with the Home Office or used for any non COVID purpose.

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<sup>3</sup> ['I was refused a home Covid test after credit check' - BBC News](#)

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This is very important because we are concerned that people who are unclear about their immigration status or who have become overstayers, may be deterred from engaging with this programme if they fear there may be implications for their immigration matters.

It is in the governments interests that there is full take up of the vaccine, so anything that could be a deterrent should be addressed head on and explicitly in any publicity campaign.

*Publicity Material*

We would request that publicity material produced to promote the programme and disseminate information with respect to it, is published in a number of languages, to ensure that official information regarding the programme is widely available. We think this is particularly important given the volume of misinformation available and disseminated in the public domain, through social media. This will also help address the possible vaccine hesitancy a programme will encounter.

We raise these issues as we are keen to ensure that any vaccine programme is as effective as possible, given the importance to public health. General practice will face an unprecedented challenge, implementing this programme and are likely to encounter unforeseen issues. By raising matters that effect migrant domestic workers, we hope to inform and assist with its roll out.

Thank you for your assistance with this matter

Yours faithfully

Rita Gava - Director  
**Kalayaan**

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