

Ending the need for food banks: consultation on a draft national plan 20th January 2022

About us

Public Health Scotland (PHS) is Scotland's lead national agency for improving and protecting the health and wellbeing of all of Scotland's citizens. Our vision is for a Scotland where everybody thrives. Focusing on prevention and early intervention, we aim to increase healthy life expectancy and reduce premature mortality by responding to the wider determinants that affect people's health and wellbeing. To do this, we use data, intelligence and a place-based approach to lead and deliver improvement against Scotland's public health priorities.

If you have any questions or would like further information, please contact: Elspeth Molony, Interim Senior Executive Lead 07717 513 623 elspeth.molony@phs.scot

Our response

Question 1: Do you think that the approach outlined is consistent with the vision to end poverty and the need for food banks? Is there anything else you think should be included?

Yes. We welcome the opportunity to respond to and help shape the development of the national plan to end the need for food banks. We agree with the vision and ambition to end the need for food banks as a primary response to food insecurity and that further action is required.

Food insecurity in Scotland

Data suggests that 8% of households (~ 200,800) in Scotland in 2019/20 had low or very low food security (were food insecure). Food insecurity is higher

¹ Department for Work and Pensions (2021) Family Resources Survey 2019/20. Household Food Security in the United Kingdom. Available:

amongst certain population groups, whose needs should be considered when planning action to address food insecurity. UK and Scottish evidence suggests that:

- Food insecurity is more prevalent amongst households headed by younger adults, lone parent households, larger families (with three or more children) and households where one or more adults has a disability.²
- While there is little available data in Scotland on the use of food banks and food insecurity by ethnic minority groups, we know that some live in higher rates of poverty and spend a higher proportion of their income on housing costs.^{3 4}
- It is also reported that Gypsy/Travellers are at increased risk of food insecurity.⁵
- Prevalence of food insecurity was also very high among low-income working-age households receiving support from the state than those over state pension age.
- Whilst 6% of households claiming Pension Credits were food insecure, this
 increased to 21% for those claiming Child Tax Credits and 43% for those
 claiming Universal Credit.⁶
- Working-age adults using food banks are also much more likely to report having a common mental health disorder or a musculoskeletal problem than the general working-age population.⁷
- 23% of households referred to food banks were homeless.⁸

 $https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/972867/Ch9_Household_Food_Security.xlsx$

² Department for Work and Pensions (2021) Family Resources Survey: financial year 2019 to 2020. Available: https://www.gov.uk/government/statistics/family-resources-survey-financial-year-2019-to-2020

³ Scottish Government (2020) Poverty and Income Inequality in Scotland 2016-19. Available: https://www.gov.scot/publications/poverty-income-inequality-scotland-2016-19/

⁴ Scottish Government (2019) Social tenants in Scotland 2017. Available: https://www.gov.scot/publications/social-tenants-scotland-2017/

⁵ Scottish Government (2020) COVID-19 Framework for Local Decision Making on Gypsy/Traveller Support - Version 4 Test and Protect – June 2020. Available: https://www.cosla.gov.uk/__data/assets/pdf_file/0026/15749/Covid19FrameworkforLocalAuthoritiesonSupportingGypsy-Travellers-V4.pdf

⁶ Department for Work and Pensions (2021) Family Resources Survey: financial year 2019 to 2020. Available: https://www.gov.uk/government/statistics/family-resources-survey-financial-year-2019-to-2020

⁷ Loh, S. et al (2020) Working-age adults using food banks in England have significantly poorer health and higher rates of mental health conditions than adults in the general population: A cross-sectional quantitative study. *Health and Social Care in the Community*. 2021 Sep; 29(5):1594-1605. https://doi.org/10.1111/hsc.13226

⁸ Sosenko, F. et al (2019) State of Hunger. A study of poverty and food insecurity in the UK. Available: https://www.stateofhunger.org/wp-content/uploads/2019/11/State-of-Hunger-Report-November2019-Digital.pdf

 The specific needs of people experiencing homelessness, especially around having no address and limited access to cooking facilities, need to be considered.

Food insecurity and health

There is evidence that stress, depression and anxiety associated with food insecurity affect more than half of households who are referred to food banks. There is evidence that children who grow up in food insecure homes are more likely to have poor health and worse educational outcomes compared with children growing up in food-secure homes. 10

Ending the need for food banks

Food banks are one of several models that provide emergency food aid. Alternative food aid providers, such as social supermarkets, pantries or larders are also used to mitigate food insecurity (as well as repurpose surplus food). There are also 'alternative hidden forms of food assistance' in faith-based settings such as mosques and temples which serve some ethnic minority groups.¹¹

We welcome the end of the use of any type of food aid provision to be used as a primary response to food insecurity and are concerned that the reliance on food aid as a response to poverty has become accepted and normalised. There is evidence that alternative food providers, as outlined above, whilst providing more choice and dignity than a food bank, are not sustainable and could not or should not be extended for three main reasons:

- The reliance on volunteers and voluntary sector.
- The reliance on an ongoing supply of surplus food.

⁹ Sosenko, F. et al (2019) State of Hunger. A study of poverty and food insecurity in the UK. Available: https://www.stateofhunger.org/wp-content/uploads/2019/11/State-of-Hunger-Report-November2019-Digital.pdf

¹⁰ Williamson, S. et al (2017) Deprivation and healthy food access, cost and availability: a cross-sectional study. *J Hum Nutr Diet*. 2017 Dec; 30(6):791-799. https://doi.org/10.1111/jhn.12489

¹¹ Power, M. et al (2017) All in it Together? Community Food Aid in a Multi-Ethnic Context. *Journal of Social Policy, 46*(3): 447-471. https://doi.org/10.1017/S0047279417000010
¹² Caraher, M. and Davison, R. (2019) The normalisation of Food Aid: What happened to

¹² Caraher, M. and Davison, R. (2019) The normalisation of Food Aid: What happened to feeding people well? [version 2; peer review: 4 approved]. *Emerald Open Res.* 2019, 1:3. https://doi.org/10.12688/emeraldopenres.12842.2

Limited reach to those experiencing food insecurity. 13 14 15

Question 2: Do you think that the actions underway will help to reduce the need for food banks as a primary response to food insecurity?

Yes, the actions underway to help reduce the need for food banks as a primary response to food insecurity will contribute to ending the need for food banks, particularly for working families with children. However, by themselves they are unlikely to achieve the policy goal, particularly because of their lack of reach or relevance for working-age households who are unable to work (especially those without children). We would therefore support Scottish Government ambitions to go further and do things differently.

Adequate income

The Department of Work and Pensions, Home Office, Scottish Government and local government need to work together to ensure that safety net incomes are adequate. Without changes within the reserved social security system, the Scottish Government will need to do even more with its existing powers. Issues to consider include public sector debt; the Scottish Child Payment; the Scottish Welfare Fund; people with No Recourse to Public Funds; and exploration of a Minimum Income Guarantee.

Public sector debt

Debts to the public sector, particularly repayment of Universal Credit advance payments and historic tax credits, are an important driver of food bank use.¹⁶ Addressing this is likely to help end the need for food bank use in Scotland. In our response to the Child Poverty Delivery Plan 2022-26 consultation¹⁷ we recommended that local and national partners in Scotland work together with the Department of Work and Pensions to identify households where debt to the public sector is impacting on child poverty and write this debt off. It would

¹³ Saxena, L. P. and Tornaghi, C. (2018) The Emergence of Social Supermarkets in Britain: Food poverty, Food waste and Austerity Retail. Research Report. Centre for Agroecology, Water and Resilience, Coventry University: Coventry. Available: https://pureportal.coventry.ac.uk/en/publications/the-emergence-of-social-supermarkets-in-britain-food-poverty-food

¹⁴ Loopstra, R. (2018) Interventions to address household food insecurity in high-income countries. *Proceedings of the Nutrition Society.* 77(3): 270-281. doi:10.1017/S002966511800006X150

¹⁵ Caraher, M. and Davison, R. (2019) The normalisation of Food Aid: What happened to feeding people well? [version 2; peer review: 4 approved]. *Emerald Open Res.* 2019, 1:3. https://doi.org/10.12688/emeraldopenres.12842.2

¹⁶ Sosenko, F. et al (2019) State of Hunger. A study of poverty and food insecurity in the UK. Available: https://www.stateofhunger.org/wp-content/uploads/2019/11/State-of-Hunger-Report-November2019-Digital.pdf

¹⁷ Available on request from elspeth.molony@phs.scot

be reasonable to extend this approach to all other groups experiencing poverty. The money advice services which the Scottish Government and local partners are investing in could act as trusted intermediaries in this process. In addition, the Scottish Government should also consider intervening directly to bridge the gap between claiming Universal Credit and receipt of first payment.

Scottish Child Payment

Whilst we welcome the Scottish Child Payment, it will not reach all groups affected by food insecurity including families with no recourse to public funds. Asylum seekers with no access to asylum support rely upon social support networks and the third sector to access food and other necessities, such as clothes and toiletries. The value of the payment itself is also set at too low a level given pressures of living costs and difficulties in increasing income from earnings. Our response to the Child Poverty Delivery Plan 2022-26 consultation outlines our rationale for this and recommends increasing the Scottish Child Payment to £30 per child per week.

Scottish Welfare Fund

In 2019/20, the Scottish Welfare Fund awarded 120,000 Crisis Grants for food. More than half (57%) were repeat awards, so the number of food insecure households being given assistance from that source in that year is likely to be less than 90,000 (assuming repeat awards received only two awards). This suggests that up to 40% of households with low or very low food insecurity received support from the Scottish Welfare Fund in 2019/20 (86,000/200,800), highlighting the limitations of the fund in meeting need. The Scottish Government should consider increasing funding of the Scottish Welfare Fund until the issue of debts to the public sector driving emergency food aid are resolved.

No Recourse to Public Funds

We welcome the joint commitment by COSLA and the Scottish Government to improve support for people with No Recourse to Public Funds in Scotland,

content/uploads/2019/03/From-Pillar-to-Post-Feb-2019.pdf

¹⁸ McKenna, R. (2019) FROM PILLAR TO POST. Destitution among people refused asylum in Scotland. Destitute Asylum Seeker Service. Available: https://www.rst.org.uk/wp-

¹⁹ Scottish Government (2020) Scottish Welfare Fund statistics: annual update 2019-2020. Available: https://www.gov.scot/publications/scottish-welfare-fund-statistics-update-to-31-march-2020/

²⁰ Scottish Government (2020) Scottish Welfare Fund statistics: annual update 2019-2020. Available: https://www.gov.scot/publications/scottish-welfare-fund-statistics-update-to-31-march-2020/

particularly the Hardship Fund and recognition that food has to be culturally appropriate.²¹

Dignified Food Access

We acknowledge that the 'Dignity Principles in Practice' programme uses a pragmatic approach to provide practical support and advice to community food aid providers to improve practice. Programmes such as these must be adequately resourced to reach and encourage food aid providers to embed more dignified approaches to food aid. There is evidence that consensus on how to implement 'dignity' can be challenging for those working on the frontline. As we move towards a cash first approach consideration should be given to revisiting and updating the dignity principles, including whether surplus food models fit into dignified and sustainable responses. For example, people with experience of the asylum system highlighted hunger and food insecurity and that, where food is accessible, it does not always meet people's dietary needs. Access to fresh fruit and vegetables was raised as a particular challenge. This can be due to a combination of the low level of financial support people receive, the cost of food and the cost of transport to reach supermarkets or other food provision.²³

Question 3: Do you think that the suggestions for what more we plan to do will help to reduce the need for food banks as a primary response to food insecurity?

Yes, the suggestions for what more Scottish Government plan to do will help to reduce the need for food banks as a primary response to food insecurity.

Exploration of a Minimum Income Guarantee

We support continued exploration of a Minimum Income Guarantee. The Food Foundation estimate that the lowest income quintiles would have to spend 40% of their disposable income to meet the requirements of a healthy diet²⁴. The 2020 Minimum Income Standard allocates a healthy food budget of £51

²¹ Scottish Government (2021) Ending destitution together: strategy. Available: https://www.gov.scot/publications/ending-destitution-together/

²² Nourish Scotland (2020) Emergency Food Provision: Dignity during COVID-19 – Online Workshop Report. Available: https://www.nourishscotland.org/wp-content/uploads/2020/10/COVID-19-Online-Workshop-Report.-7-External.pdf

²³ Scottish Government (2021) Ending Destitution Together: A Strategy to Improve Support for people with No Recourse to Public Funds living in Scotland 2021-2024. Available: https://www.gov.scot/publications/ending-destitution-together/pages/1/

²⁴ Scott, C. et al (2018) Affordability of the UK's Eatwell Guide. The Food Foundation. Available: https://foodfoundation.org.uk/sites/default/files/2021-10/Affordability-of-the-Eatwell-Guide_Final_Web-Version.pdf

per week for a single working-age adult with no children (£7.31 per day).²⁵ The safety net income under Universal Credit of £324 a month (£10-11 a day) suggests 60-70% of their disposable income would have to go towards food alone.

Strengthening the protection of human rights

We agree with the recommendation to strengthen the protection of Human rights, including a right to adequate food, as an essential part of the overall right to an adequate standard of living.

Implementing a rights-based approach to food, and specifically a rights-based approach to food insecurity, has the potential to influence household food security, reduce nutrition-related inequalities and improve health.²⁶

The national plan for ending the need for food banks would support the national strategy for Ending Destitution Together. The strategy takes a human rights-based approach and recognises the fundamental rights to an adequate standard of living – in particular the right to food, housing and social security which is essential to ending destitution.²⁷

Concerns about where to access food impacts on the ability of people seeking asylum to focus on their legal case. Asylum seekers report not being able to focus on their legal case as when they are destitute their primary concern is finding a place to sleep and food to eat.²⁸

Invest in cash-first local partnership work to make food banks the last port of call.

We agree and welcome a cash-first approach. Providing cash to households facing hunger due to an income crisis provides the most dignified response. The benefits of a cash-first, rather than a food aid first, approach are well

²⁵ Loughborough University (2021) *Household Budgets*. Centre for Research in Social Policy. Available: https://www.lboro.ac.uk/research/crsp/minimum-income-standard/household-budgets/ [Accessed 15 December 2021]

²⁶ NHS Health Scotland (2015) Position statement on food poverty. Briefing paper. Available: http://www.healthscotland.scot/publications/position-statement-on-food-poverty

²⁷ Scottish Government (2021) Ending Destitution Together: A Strategy to Improve Support for people with No Recourse to Public Funds living in Scotland 2021-2024. Available: https://www.gov.scot/publications/ending-destitution-together/pages/1/

²⁸ McKenna, R. (2019) FROM PILLAR TO POST. Destitution among people refused asylum in Scotland. Destitute Asylum Seeker Service. Available: https://www.rst.org.uk/wp-content/uploads/2019/03/From-Pillar-to-Post-Feb-2019.pdf

documented and include reducing stigma and providing choice.^{29 30} Leadership and communication will be required to help build system-wide understanding and commitment to this approach.

We support a holistic approach including continued investment in the embedding of welfare and debt advice in community and health to increase incomes, improve health and reduce health inequalities.^{31 32} It is important to recognise that some groups will require a wider package of support than others. It may be useful to look across other policy areas implementing holistic support packages and incorporate learning from them, for example from the Housing First approach.

Much of the emergency food aid system is operated by voluntary organisations and volunteers. Consideration must be given to ensure that implementation is sufficiently resourced to ensure consistent and accurate messaging and services. Evidence suggests that policies which are proposed in ways that readily lead to implementation and evaluation are more likely to succeed.³³

Piloting the use of shopping vouchers in place of food bank referrals.

'Cash-first' responses to food insecurity should always be the preferred option. However, we recognise that vouchers are a more dignified than being referred to a food bank to alleviate an immediate crisis. Whilst vouchers may provide more autonomy than using a food bank, consideration needs to be given to ensuring these can be used in an adequate range of outlets, and

²⁹ Hilber, D. and MacLeod, M.A. (2019) The Scottish Welfare Fund: Strengthening the Safety Net. A Study of Best Practice. Available:

https://amenuforchange.files.wordpress.com/2020/01/a-menu-for-change-swf-report-updated.pdf

³⁰ Independent Working Group on Food Poverty (2016) Dignity: Ending Hunger Together in Scotland. Available: https://www.gov.scot/publications/dignity-ending-hunger-together-scotland-report-independent-working-group-food/

³¹ Public Health Scotland (2021) *Allocating resources proportionate to need - Improving access to financial advice in GP practices*. Available: http://www.healthscotland.scot/reducing-health-inequalities/case-studies-of-inequalities-sensitive-practice/allocating-resources-proportionate-to-need/improving-access-to-financial-advice-in-gp-practices [Accessed 15 December 2021]

³² Egan, J. and Robison, O. (2019) Integrating money advice workers into primary care settings: an evaluation. Available:

https://www.gcph.co.uk/assets/0000/7293/Advice_workers_in_deep_end_GP_primary_care_setting.pdf

³³ Theis, D.R.Z. and White, M. (2021) Is Obesity Policy in England Fit for Purpose? Analysis of Government Strategies and Policies, 1992–2020. *The Millbank Quarterly*. 2021 Mar; 99(6): 126-170. https://doi.org/10.1111/1468-0009.12498

address costs for other essentials such as transport or personal or household items. ³⁴

Concerns were raised during the pandemic by frontline staff working with asylum seekers that the Home Office may penalise asylum seekers who had previously relied on food banks for receiving food aid such as supermarket vouchers as it could be considered additional income to their asylum support payment (£37.75 per week).³⁵ If shopping vouchers were to replace food bank referrals consideration would need to be given as to whether asylum seekers would be indirectly discriminated against.

Development of shared values between national food insecurity funders on access to emergency financial assistance and holistic support services.

We welcome plans to develop shared values between national food insecurity funders on access to emergency financial assistance. We recommend that shared values must be agreed by and adopted across the wider emergency food aid system. This should include a wider set of national and local organisations than outlined, including alternative food aid provision such as social supermarkets, pantries and larders, as well as food aid suppliers such as supermarkets and producers.

There is evidence that the differing approaches and perceived barriers to accessing local welfare provision can lead to a lack of confidence among frontline staff that those using food aid provision will be provided for.³⁶ ³⁷ Therefore, buy-in of shared values from local food aid providers is particularly important to ensure confidence that a cash first and holistic approach is effective and will result in a reduction in the need for food aid.

³⁴ Child Poverty Action Group (2020) *Is Food the Right Response to Child Hunger?* Available: https://cpag.org.uk/news-blogs/news-listings/food-right-response-child-hunger [Accessed 15 December 2021]

³⁵ Children's Neighbourhoods Scotland (2020) Refugee, asylum seeking and Roma families during the Covid-19 pandemic: Insights from frontline workers in Glasgow. Available: https://childrensneighbourhoods.scot/wp-content/uploads/2020/12/CNS-refugee-and-migrant-families-report.pdf

³⁶ Marshal, C. and Goodwin, S. (2021) Independent Food Aid Network and Nourish Scotland report - Promoting a 'cash first' approach to food insecurity in Scotland: Lessons from developing 'Worrying About Money?' leaflets. Available: https://www.nourishscotland.org/wp-content/uploads/2021/07/Promoting-Cash-First-in-Scotland-300621_FINAL.pdf

³⁷ MacLeod, M.A. (2015) Making the Connections: A study of emergency food aid in Scotland. Available: https://www.povertyalliance.org/wp-content/uploads/2019/03/Emergency-Food-Aid-Report.pdf

Consideration should be given to co-production of shared values with national food aid providers/ local networks and others involved in food aid provision, such as FareShare.

Question 4: Is there anything else that you think should be done with the powers we have at a national or local level to reduce the need for food banks as a primary response to food insecurity?

As well as policies related to maximising income, we urge the Scottish Government to ensure coherence across wider policies related to food and health systems and consider levers which can support the national plan through, for example, the Good Food Nation Bill.

Adequate income is a key factor to addressing food insecurity, however there are numerous other factors, including local access to and availability of affordable nutritious culturally acceptable food, lack of transport, equipment and social rules, which need to be considered.³⁸ ³⁹ Alongside income-related policies, coherence across wider policy areas will be essential to ensure that ending the need for food banks translates into health improvements and reduced health inequalities.

Research shows that higher weight impacts people of all backgrounds. However, levels of obesity are very closely linked to the socio-economic circumstances within which people live. Adult obesity rates are consistently higher in Scotland's most deprived areas compared to the least deprived. There is a similar pattern of inequalities in child weight across Scotland, and in recent years the gap has been widening between those in the least and most deprived groups. As a similar pattern of inequalities in child weight across Scotland, and in recent years the gap has been widening between those in the least and most deprived groups.

³⁸ British Dietetic Association (2020) Food Poverty Policy Statement. Available: https://www.bda.uk.com/uploads/assets/84574fdc-8843-4996-ba5aabf1fa1c49ed/Food-Poverty-Policy-Statement.pdf

³⁹ NHS Health Scotland (2015) Position statement on food poverty. Briefing paper. Available: http://www.healthscotland.scot/publications/position-statement-on-food-poverty

⁴⁰ The Institute of Health Equity (2010) Fair Society Healthy Lives (The Marmot Review). Available: https://www.instituteofhealthequity.org/resources-reports/fair-society-healthy-lives-the-marmot-review

⁴¹ Scottish Government (2020) Diet and healthy weight: monitoring report 2020. Available: https://www.gov.scot/publications/diet-healthy-weight-monitoring-report-2020/

⁴² Public Health Scotland (2020) Primary 1 Body Mass Index (BMI) statistics Scotland. School year 2019-2020. Available: https://publichealthscotland.scot/publications/primary-1-body-mass-index-bmi-statistics-scotland-school-year-2019-to-2020/

⁴³ Tod, E. et al (2017) Obesity in Scotland: a persistent inequality. *Int J Equity Health.* 2017; 16: 135. https://doi.org/10.1186/s12939-017-0599-6

Affordable healthy food is essential to health, but research suggests that calorie for calorie healthier foods are more expensive than less healthy food, and the cost of a healthy diet can be prohibitive for some groups. 44 45 46 Evidence also suggests that it is harder to buy healthier food in deprived communities due to a higher density of fast-food outlets in these areas. 47

Question 5: Do you have any views on how we intend to measure impact, and what would give you confidence that we are moving in the right direction?

We welcome the recognition of the requirement for a comprehensive monitoring strategy to ensure that the intended outcomes of the plan have been achieved.

Confidence that we are moving in the right direction will be provided by a reduced need for foodbanks as evidenced by, for example:

Fewer people using food banks.

[Accessed 15 December 2021]

- Positive feedback from health and wellbeing surveys (such as the Scottish Health Survey and Family Resources Survey).
- Positive feedback from frontline staff working with those experiencing food insecurity.
- Feedback from local organisations and communities that the cash-first approach is resulting in reduced need for food banks.

We would encourage the Scottish Government to review their approach and adapt the monitoring strategy as appropriate throughout the process, should this be required.

11

⁴⁴ The Food Foundation (2021) The Broken Plate 2021: The State of the Nation's Food System. Available: https://foodfoundation.org.uk/sites/default/files/2021-10/FF-Broken-Plate-2021.pdf

⁴⁵ Rao, M. et al (2013) Do healthier foods and diet patterns cost more than less healthy options? A systematic review and meta-analysis. *BMJ Open.* 2013; 3(12). doi: 10.1136/bmjopen-2013-004277

⁴⁶ Darmon, N. and Drewnowski, A. (2015) Contribution of food prices and diet cost to socioeconomic disparities in diet quality and health: a systematic review and analysis. *Nutrition Reviews*. 2015 Oct; 73(10):643-60. https://doi.org/10.1093/nutrit/nuv027 ⁴⁷ The Health Foundation (2017) *Our food and health. How is our health influenced by the food we eat?* Available: https://www.health.org.uk/infographic/our-food-and-our-health