

Submission to the Scottish Government Consultation on ending the need for food: consultation on a draft national plan

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? [Y/N/Don't Know] [Open comment]

Yes.

The Mental Health Foundation's vision is for a world with good mental health for all. We work to prevent mental health problems. We drive change towards a mentally healthy society for all, and support communities, families and individuals to live mentally healthier lives, with a particular focus on those at greatest risk. **As a prevention-focused charity, we welcome the Scottish Government's approach to ending the need for food banks, aligned with a wider commitment to human rights and eliminating poverty in Scotland, underpinned by a dual focus on prevention and response.** This situates this draft national plan in a wider policy context that recognises the complex and multiple issues that result in food bank use and that must be addressed collectively.

Approach

To ensure that the Scottish Government's approach achieves its goals, it must be underlined that household food insecurity is caused by people not having enough money to afford food, due to lack of adequate income or social security payments, precarious work and rising living costs. Tax and welfare reforms over the last decade have disproportionately negatively impacted poorer households¹. It is estimated that over 10% of the UK population is affected by food insecurity² and the 2019 Scottish Health Survey showed that 9% of adults in Scotland worried about running out of food due to lack of money or other resources³.

This approach must consider the population groups most worried about or impacted by running out of food: adults on low incomes (27%), single parents (25%), single adults living alone (21%) and adults living in the most deprived areas of Scotland (16%)⁴. **A focus on ensuring that people with protected characteristics are fully included within the plan will be imperative to achieving the goal to end the need for food banks as a primary response to food insecurity, for example age, ethnic origin and gender, because the way that different population groups will or will not involve in the actions set out by the plan will differ greatly.**

Prevention

In terms of prevention, it should be acknowledged that household food insecurity is an economic, social and health care issue. **The Mental Health Foundation is concerned about the rising use of food banks primarily because poverty and poor mental health are inextricably linked. Given the negative impact of food insecurity on the physical and mental health of those who experience it, one cannot be tackled without addressing the others**⁵.

¹ https://www.waronwant.org/news-analysis/uk-food-poverty-right-food-human-right?gclid=EAlaIqobChMI7cXp85e29QIVCrTtCh0Drw7REAAAYAiAAEgLeEPD_BwE.

² <https://academic.oup.com/jpubhealth/advance-article/doi/10.1093/pubmed/fdab120/6232493>.

³ <https://www.gov.scot/publications/mapping-organisations-responding-food-insecurity-scotland/pages/2/>.

⁴ <https://www.gov.scot/publications/mapping-organisations-responding-food-insecurity-scotland/pages/2/>.

⁵ <https://onlinelibrary.wiley.com/doi/full/10.1111/hsc.12872>.

The Foundation supports the use of the Independent Food Aid Network's Hierarchy of Responses as a helpful tool to frame the draft national plan. The Foundation believes that the approach outlined in the plan is consistent with the vision to end poverty and the need for food banks as a primary response to food insecurity. **However, the link between household food insecurity and poor mental health should be made much more explicit and therefore there are elements of the approach and plan that we recommend be reviewed to reflect the impact of food scarcity on mental health throughout.**

We welcome the **preventative** focus on fair work and wages, an effective social security system with adequate payments and a commitment to reducing the cost of living, enabling everyone to buy sufficient, healthy and nutritious food that meets their needs and preferences. If achieved at national scale, this will reduce food bank use and positively impact the mental health and wellbeing of all citizens in Scotland.

Response

The Mental Health Foundation backs the Scottish Government's calls for an approach that promotes a joined-up locality-based **response** to end the need for food banks as a primary response to food insecurity and one that promotes emergency financial support and money advice in place of food parcels. We welcome plans for developing a holistic network of support services alongside a cash-first approach. **The Foundation recommends that mental health providers and advocates form an integral part of any holistic support service network to ensure that those who live in poverty and who have been forced to use food banks receive the right support to improve their mental health and wellbeing and that related policy developments adopt a mentally healthy approach.**

While cash-first interventions aligned with a human rights-based approach that offer dignity and choice are favourable to emergency food aid and shopping vouchers, the Foundation does acknowledge that unforeseen crises situations will arise that require immediate access to food. Removing options to access food parcels and vouchers before wider societal and structural causes of poverty are addressed will mean that some people fall through the gaps. In cases where people face waiting for benefits or experience a change of circumstances that disrupts their income, there is still a place for food banks and vouchers for Emergency Use Only and as a last resort⁶. As an emergency measure we recognise the benefit of shopping vouchers and endorse plans to trial in the advice sector. Significant investment will be required to implement an effective and accessible network of services and resources for those most in need.

2. Do you think that the actions underway will help to reduce the need for food banks as a primary response to food insecurity? [Y/N/Don't Know]

Yes.

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? [Y/N/Don't Know]

Yes.

⁶ <https://www.trusselltrust.org/wp-content/uploads/sites/2/2016/01/foodbank-report.pdf>.

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? [Open comment]

Fair work and wages

Achieving the Scottish Government's vision to end poverty will be determined by the success of its commitment to ensure fair wages, secure work, and a well-functioning social security system with adequate welfare payments. Only under these circumstances will a reliance on food banks as a primary response to food insecurity reduce. Tackling income poverty would result in a reduction in the prevalence of food banks, reversing the rising rates of use observed particularly over the last decade. **The Scottish Government should use the devolved powers that are available to it at both national and local level to achieve the actions set out in the draft plan which has the potential to become even more ambitious with the support and input from partners including the Mental Health Foundation.**

Considering the Scottish Government's commitment to Fair Work for all, we know that poverty, job insecurity and underemployment are among the root causes of poor mental health. **Research carried out by the Mental Health Foundation in 2020 indicated that a third of adults in Scotland in full-time work are worried about losing their jobs⁷. The survey found that nearly a third of adults who participated said that they were concerned about their finances, including bills and debts. Further, it revealed that one in six people unemployed at the start of the pandemic reported having suicidal thoughts.** This work highlights the extreme financial and employment inequalities caused and exacerbated by the pandemic and the impact on people's mental health. Financial and job security are closely linked to mental health and economic insecurity will affect the poorest. Secure employment results in increased financial security, physical health and psychological wellbeing.

Regarding fair wages, and despite the successes of the Living Wage Scotland initiative in partnership with the Poverty Alliance, it is estimated that around 333,000 employees in Scotland are still paid below the real Living Wage⁸. The Foundation welcomes progress so far however recognises that there is more work to be done and encourages the Scottish Government to continue to champion the real Living Wage to increase incomes across the country and build a Living Wage Nation. When barriers to fair wages are abolished, we will then see a reduction in food bank use and improvement in mental health outcomes for the people of Scotland.

To lift people out of poverty through employment, the Scottish Government must continue to support organisations to adopt Fair Work First criteria in both the public and private sectors. It has been found that job insecurity can be as damaging for mental health as unemployment. Poverty is bad for mental health enforcing health inequalities among people who are more structurally at risk and there is evidence to suggest that people who claim social security benefits, many of whom will be in work, report feeling stigmatised. **The Foundation recommends continuous review of employability and social security services as a critical measure, to create alignment with the principles of dignity and respect that the Scottish Government aspires to.**

We believe that there are practical ways in which to remove barriers to work and claiming benefits, particularly for people living with mental health problems who face greater challenges. Reduced barriers to work and greater uptake of benefit payments will lead to increased incomes and less reliance on food banks as a primary response to food insecurity.

⁷ [Coronavirus: Mental Health in the Pandemic | Mental Health Foundation.](#)

⁸ [Real Living wage increase expected to help lift more Scots out of poverty \(pressandjournal.co.uk\).](#)

The Foundation recommends that all Jobcentre staff receive Mental Health First Aid Training, to provide them with an awareness of the issues experienced by people with poor mental health. The prevalence of mental health problems among people who are unemployed and living in poverty is high. Anecdotal reports suggest that people can experience mental health stigma from Jobcentre staff and find processes discriminatory, which can lead to worsening of their mental health. If Jobcentre staff are trained to identify and understand the interconnections between mental health and unemployment, barriers to claiming benefits and seeking employment could be better addressed.

Additional support for people with mental health problems using Jobcentre services could include stress risk assessments, behaviour at work policies and mentally healthy workplace training to ensure that staff and clients get the support and advice they need. The Foundation would further suggest that unsupported online job searches and benefits claims, that have increased during the Covid-19 pandemic, are unsuitable for many people with poor mental health and for those who cannot or will not use the internet. Suitable in-person support should be re-introduced for those who will benefit from it most. **Adopting a tailored and person-centred approach to working with unemployed people in receipt of social security payments will increase the efficiency of and engagement with welfare and employability services, and therefore contribute to a reduction in the need for food bank use.**

A preventative approach that adheres to the principles of Fair Work is crucial to a fully functioning and healthy society. **The Foundation recommends that the Scottish Government continues to ensure that the public sector adopts its Fair Work strategy. Work with private and third sector partners must be progressed to address issues of job insecurity and underemployment across sectors and industries, beyond the public sector.** While the Scottish Government has shown commitment to improving workplace wellbeing through its Fair Start Scotland service and Mental Health and Employment Working Group, more will need to be done to combat increased job insecurity and rising unemployment in the wake of the furlough scheme and end to the Universal Credit uplift. The Foundation and partners call for the Scottish Government to provide an economic safety net for all, regardless of employment status, including turning the Universal Credit advance payment into a grant, campaigning with third sector partners to end welfare sanctions and removing the five-week waiting period for a first Universal Credit payment.

Women, work and wellbeing

The Mental Health Foundation recognises the actions identified in the Scottish Government's Gender Pay Gap Action Plan to realise its ambition of fair wages and to tackle the pressing issue of economic inequality experienced by women. There is much more to be done in Scotland in terms of women's labour market participation. Scotland's gender pay gap is high at 10% and the women's labour market is 'characterised by low pay, discrimination, insufficient working hours and precarious work'⁹. This becomes even more pronounced for young women, women with disabilities, and women from Black, Asian and minority ethnic communities. **The Foundation recommends a gendered approach to Fair Work policy development.**

Women are more likely to be in part-time, low paid and insecure work, factors that result in poorer mental health outcomes. Add to that women-specific experiences such as pregnancy, post-natal health, disproportionate caring responsibilities and menopause, and it is unsurprising that the mental wellbeing of women in the workplace is suffering. **The Foundation recommends that women's mental health should be more explicitly addressed in the Action Plan given the negative impact on mental health of low paid and unstable employment and relative lack of career progression. With the additional**

⁹ <https://www.closesthegap.org.uk/content/resources/Close-the-Gap-response-to-the-Scottish-Governments-consultation-on-Becoming-a-fair-work-nation---December-2021.pdf>.

challenges that women face in the workplace, they and their families are more likely to become trapped by poverty and experience household food insecurity.

Social security

A study carried out by Welfare at a Social Distance to investigate the UK benefits system during the Covid-19 pandemic funded by ESRC found that over half (52.9%) of those surveyed with experience of being food insecure were claiming income or work related benefits and among those classed as severely food insecure, 62.1% were claiming benefits¹⁰. The report concluded that food insecurity and benefits are intertwined issues and that a significant increase in benefits would be required to see a fall in food insecurity. To underline the extent of the crisis, recent research by the Institute for Fiscal Studies indicates that benefits must be increased by twice as much as planned in 2022 if the poorest households are to be supported through the cost-of-living crisis¹¹. If we are to see a reduction in food bank use as a primary response to food insecurity, the cost-of-living crisis must be mitigated by increasing incomes through adequate work, wages and social security payments.

Specifically, the Mental Health Foundation recommends further consideration of the Scottish Government's plans to double the Scottish Child Payment and increase eligibility to under 16s from April 2022. While this is a positive development, careful thought needs to be given as to how families with children and young people manage in the meantime and cope with the financial demands of raising dependent young people aged 16-18.

The Foundation recommends that the Scottish Government should continue to use the powers it has to maximise income from social security and continually review its developing social security system to ensure it is delivering on claims that it is founded on the principles of dignity, respect and social security as a human right. A more efficient social security system providing adequate welfare payments will maximise incomes for those most in need and contribute to ending the need for food banks as a primary response to food insecurity.

The Foundation recommends that the continued design of Social Security Scotland is undertaken in a way that rebuilds trust with benefits recipients many of whom have been penalised throughout successive UK Government welfare reforms, which directly contributed to the population mental health crisis that is evident today in Scotland and the UK. **Building a social security system based on human rights and founded on the principles of dignity and respect will nurture a person-centred approach that will see increased uptake of benefits, rising incomes and reduced food bank use.** As disability payments form the largest part of the Scottish Government's social security budget, and as we move closer to the introduction of the Adult Disability Payment and doubling of the Scottish Child Payment, it is suggested that the Government invests time and effort into understanding why people do not take up benefits for physical and mental health conditions and uses this research to inform its take-up strategy¹². **The Foundation recommends that the Scottish Government progresses with plans to end stigma and discrimination related to benefit uptake, which will increase household incomes, reduce food insecurity and improve mental health outcomes for those accessing social security as a human right.**

Boosting people's income through social security payments will help end the reliance on food banks as a primary response to food insecurity. Rebuilding people's trust in a system of welfare that has been broken by the UK Government is essential to improve uptake of benefits in Scotland that will increase incomes, reduce poverty and food bank use.

¹⁰ <https://www.poverty.ac.uk/editorial/hunger-and-welfare-state-food-insecurity-among-benefit-claimants-during-covid-19>.

¹¹ [Benefits must rise to twice as much as planned to ease cost of living crisis, says IFS | Institute for Fiscal Studies | The Guardian](#).

¹² <https://digitalpublications.parliament.scot/Committees/Report/SSC/2020/3/11/Benefit-Take-up>.

Removing access barriers presented by complicated application forms, poor signposting, unfair criteria and non-person-centred policies will improve mental health outcomes for those in need of benefits and contribute to creating a mentally healthy society.

Reduced cost of living

As UK citizens experience an unprecedented rise in energy prices, a cut in Universal Credit of £20 for the poorest in society, increased national insurance and growing inflation, it is unsurprising that more and more people are forced to turn to food banks for basic survival and the population mental health crisis that existed pre-pandemic spirals out of control. According to Reuters, the number of British households struggling with energy bills is set to triple and it is estimated that the UK Government will need to spend more than £7 billion in 2022 to offset the effect of rapidly increasing household energy prices. In Scotland it is predicted that energy bills could increase by as much as 50% by April 2022. The effects of increased energy costs leading to a steep rise in fuel poverty combined with reduced Universal Credit payments, higher national insurance and rising inflation will reduce household incomes across Scotland placing more people in debt. More people living in poverty will lead to rising food bank use.

Evidence shows that increased cost of living is directly associated with poor mental health. Being unable to manage bills and living in debt can cause stress, depression and anxiety and this is emphasised by research that shows that 50% of adults who are struggling with debt also experience mental health problems¹³. As highlighted by Citizens Advice Scotland, poor mental health and money problems are inseparable, as limited income means that people are likely to constantly worry about providing for their families and experience debt-related stigma perhaps compounding already existing mental health stigma¹⁴. The impact of Covid-19 has placed increased financial burdens on people who were already struggling with money pre-pandemic, due to job losses and reduced working hours. Decreased incomes and the economic impact of the pandemic has hit the poorest hardest, and more people have been forced to access emergency food aid as referrals to food banks soared.

The Mental Health Foundation endorses an increase in the number of and access to advice services, such as Citizens Advice Scotland's Money Talk Team, which have maximised household incomes by delivering in non-traditional settings to improve reach and uptake. Research produced by the Coalition for Racial Equality and Rights in 2020 found that prior to the Covid-19 pandemic, minority ethnic people in Scotland faced disproportionate levels of poverty and were less likely to access mainstream advice services¹⁵. The research showed that in Scotland, someone from a Black, Asian and minority ethnic group is twice as likely to experience poverty as someone from a white Scottish or British background. This indicates that people from minority ethnic populations are likely to be among those hit hardest by increasing costs of living and experience related mental health problems. **The Foundation recommends that the Scottish Government proceeds without delay in developing an Advice Services Strategy to support people from priority groups in an individualised way, such as low-income families. We strongly suggest that this service be extended to include people from Black, Asian and minority ethnic communities in a culturally appropriate manner.**

Considering childcare costs and their impact on the cost of living, expanding the number of early years funded childcare hours and the free school meals offering is also welcome. This will contribute to reduced cost of living for families across Scotland and support people (largely women) to return to work or to increase their working hours, therefore increasing household incomes and reducing food insecurity. **The Foundation suggests however that the Scottish Government reviews its support in this area, to include early years**

¹³ <https://www.nationaldebthline.org/fact-sheet-library/debt-and-mental-health-s/>.

¹⁴ <https://www.cas.org.uk/news/opinion-pandemics-impact-mental-health-has-been-devastating>.

¹⁵ <https://b0353f24-0d04-4fc5-9c7d->

2716ba8ba44f.usrfiles.com/ugd/b0353f_0db6596cc9ee46ab9aa13b97699aae79.pdf.

funded childcare hours for all children from two years old and progresses its commitment to offering free school meals to all primary school pupils. This will not only reduce reliance on food banks as a primary response to food insecurity but will also help tackle the shame felt by parents who do not earn enough to adequately provide for their children, and the humiliation experienced by children identified as receiving receive free school meals.

Recent research carried out by the Mental Health Foundation into student mental health and wellbeing found that over a fifth (21.5%) of students surveyed worried about running out of food, nearly a quarter (23.5%) ate less due to a lack of resources or money and 7.2% lived in households that had run out of food¹⁶. The rising cost of living affects students who represent a significant proportion of Scotland's population, and who struggle to find a balance between funding their degree, working, affording food and accommodation. In 2021, research carried out by the National Union of Students found that 14% of students surveyed had used food banks¹⁷. The study reported that the Covid-19 pandemic had negatively impacted the income of three in five students in Scotland and despite improvements to supporting the cost of living for students introduced by the Scottish Government, many are struggling to make ends meet. The Foundation recommends that students are not overlooked as a population group in the development of this national plan and that student-specific policies are embedded into actions to end the need for food banks that will allow them to eat well and focus on their academic studies.

Minimum Income Guarantee, Universal Basic Income and Universal Basic Services

The Foundation welcomes continued discussion around Minimum Income Guarantee, Universal Basic Income and Universal Basic Services.

We support the concept that the Minimum Income Guarantee (MIG) is an assurance that no one will fall below a set income level that would allow them to live a dignified life. A MIG should reduce poverty, inequality and insecurity as a payment that people on low incomes and other forms of support can rely on. A significant effect of a MIG should be a reduction in food bank use. **The Foundation recommends that development and evaluation of the MIG trials incorporate a mental health component. Given that poverty and poor mental health go hand in hand, the Foundation is actively seeking to be involved in relevant Scottish Government MIG workstreams to ensure that mental health outcomes are embedded in policy and practice.**

The Foundation also welcomes proposals for pilots of a Universal Basic Income (UBI) Guarantee in Scotland. UBI aims to provide an economic safety net for all. Moreover, our recent review of UBI pilots from high-income countries around the world found it holds the potential to significantly improve population mental health and well-being¹⁸. This review concluded that removing the conditions associated with traditional welfare benefits was related to improved mental wellbeing among participants of adult studies. Participants reported a reduction in feelings of stress, symptoms of psychiatric disorder and perceptions of stigma and marginalisation, through to overall improvements in mental wellbeing and better cognitive functioning. **The Foundation urges the progression of work around supportive, tailored and unconditional interventions including Universal Basic Income and would seek to be a partner in these discussions to ensure that the mental health components are well-represented and understood.**

We also look forward to debate about the benefits and value of redesigning public services in Scotland to provide Universal Basic Services. With some of the worst health inequalities in the Western world, Scotland's leaders are in the position to pave the way for discussions

¹⁶ https://www.mentalhealth.org.uk/sites/default/files/MHF_Thriving_Learners_Report%20%281%29.pdf.

¹⁷ <https://www.heraldsotland.com/news/19129298.coronavirus-scotland-student-poverty-fears-foodbank-use-jumps/>.

¹⁸ [MHF UBI Report FINAL \(1\).pdf \(mentalhealth.org.uk\)](#).

with communities to understand what fit-for-purpose services look like. The Foundation holds the view that Universal Basic Services that are collectively developed and accessible by all would eliminate the need for food banks and other temporary interventions and funds that support people through challenging times until the next crisis arises. **The Foundation is keen to be an integral partner in discussion about the potential for Universal Basic Services that have the power to improve physical and mental health of the nation.**

Housing

Despite the Scottish Government's progress towards delivering more affordable homes, we still live in a society characterised by low quality and hard to access housing. Waiting lists for social housing are longer than they have ever been while uncapped rents climb sharply in the private rented sector. The Scottish Government's 2018 homelessness strategic action plan committed to significant investment in funding for housing in order to deliver 50,000 new affordable homes by March 2021, however the impact of Covid-19 pandemic restrictions left the Government unable to meet this target. **The reality in Scotland is that one household becomes homeless every 18 minutes**¹⁹.

We know that having a secure home creates a sense of belonging and emotional wellbeing not experienced by those living in unsuitable housing, staying with friends and family or living in temporary homes including hostels and night shelters. Insecure and unsuitable housing permeates all areas of life, creating barriers to sustaining employment and education and having to choose between paying rent or mortgage and eating. The housing crisis has directly contributed to increased food bank use, and it has a devastating impact on physical and mental health. We believe that everyone in Scotland should have the right to a safe, warm and affordable home, without having to sacrifice food or other essentials. As people living in Scotland face an end to the council tax freeze from April 2022, giving local authorities the freedom to set council tax rates, households are set to experience another increase in household bills that is likely to increase food insecurity. **The Foundation recommends embedding the need for safe and affordable housing into this draft national plan and continual review of how local authorities set council tax rates going forward.**

Scottish Welfare Fund

The Scottish Welfare Fund is a discretionary scheme established in 2013 that includes different types of grants administered by local authorities that do not have to be repaid. The Mental Health Foundation recognises that crisis grants help people cope with unexpected expenses and has been a significant source of help for people prior to and during the pandemic. We welcome the boost to Scottish Welfare Fund at the start of the pandemic. The Scottish Government doubled the funds available to mitigate the impact of Covid-19, however recent Scottish Government figures suggest that while more money is available, fewer grants were made in 2020, compared to 2019. Some charitable organisations supporting people through the pandemic have claimed that the number and amount of grants administered varies hugely across the country²⁰. **The Foundation calls for a review of guidance for local authorities about how to use the funds most effectively so that they are reaching those most in need. We recommend that the Scottish Government commissions further independent evaluation of the Scottish Welfare Fund, to learn from its successes and challenges and use this learning to improve the Fund for the future.**

Cash-first approaches

The Mental Health Foundation agrees with the premise of this national plan that cash-first approaches are preferable to providing access to emergency food aid as a response to a crisis of income resulting in food scarcity. The Independent Food Aid Network and partners

¹⁹ Scottish Government (2020). More homes. Retrieved from: <https://www.gov.scot/policies/more-homes/affordable-housing-supply/>.

²⁰ <http://edinburghagainstopoverty.org.uk/?p=2783>.

have supported this approach by developing cash-first referral leaflets outlining options such as welfare or financial advice in local areas across Scotland²¹. The design of the leaflets was based on learning from Scotland's [A menu for Change project](#), and since June 2020, the Independent Food Aid Network has worked with local stakeholders to publish leaflets across 17 Scottish local authorities in online and printed formats.

The Scottish Government is the first in the UK to trial this approach to addressing household food insecurity at scale and the only nation to see a subsequent fall in food bank use as reported by the Trussell Trust in November 2021²². Data from the Trussell Trust network of food banks in Scotland showed a 25% decrease in the distribution of food parcels between 2019 and 2020²³. The Trussell Trust links this decrease, which has not been seen elsewhere in the UK, to Scotland's unique policy interventions including a cash-first approach. A ScotCen impact report in November 2021 found that people facing financial difficulties and who accessed one-off payments experienced increased income that they would not have otherwise. The leaflets also increased people's awareness of sources of support in addition to food banks in an accessible, practical and consistent way across local authorities²⁴. **The Foundation welcomes the straightforward advice and support set out in cash-first referral leaflets and that they have been co-designed by people with lived experience.** This is a practical example of how people can be involved in decisions that can improve their lives in a more inclusive and sustainable way.

The Mental Health Foundation supports a roll out of cash-first approaches as a contribution to ending the need for food banks as a primary response to food insecurity. Providing cash to people who cannot buy food due to financial crisis is a means by which they can be supported in a more dignified way. The Foundation agrees that cash-first approaches do provide people with a level of self-respect and choice not experienced when using a food bank. By prioritising access to emergency financial assistance and a holistic network of support instead of emergency food aid is a step closer to the vision of a Scotland in which everyone has sufficient and secure income to be able to access food that meets their needs and preferences.

However, data from the Scottish Government and the Trussell Trust suggests that the overall need for food bank use in Scotland remains high, and cash grants are not a long-term solution to household food insecurity. Recipients may still experience the internal and external stigma associated with requiring emergency financial assistance as opposed to being financially independent and stable. Like food banks, one-off emergency cash grants are a temporary remedy for situations of financial crisis. **The Foundation suggests that while cash first approaches are preventative in that they reduce food bank use, they are not a substitute for adequate income and secure employment conditions.**

Investing in cash-first partnership work

More broadly, we endorse plans to ensure joined-up support for those in financial crisis from a range of providers, including mental health. **The Foundation is keen to be involved in supporting this network to adopt a mentally healthy approach that will result in a sustainable structure that can deliver empathetic and holistic support to people who may be in distress and suffering from lack of money and food in a trauma-informed way.**

²¹ <https://www.foodaidnetwork.org.uk/cash-first-leaflets>.

²² <https://www.ekklesia.co.uk/2021/12/02/is-scotlands-cash-first-approach-beginning-to-tackle-hunger/>.

²³ <https://www.trusselltrust.org/wp-content/uploads/sites/2/2021/11/Trussell-Trust-Mid-Year-stats-data-briefing-April-to-September-2021-1.pdf>.

²⁴ <https://uploads.strikinglycdn.com/files/f6973134-5d81-4eb5-83c1-3b6e66b10b41/Final%20Worrying%20About%20Money%20Report%20-%20ScotCen%20Nov%2021.pdf?id=3723275>.

The Foundation would add that any local and national networks of support providers established as a result of the national plan should include mental health services and support providers. Poverty and poor mental health go hand in hand and must be tackled as such. Where we find socio-economic inequalities, we will also find mental ill health therefore a genuine preventative approach will acknowledge and put supports and interventions in place to address both. **The Mental Health Foundation would encourage careful consideration of the relationship between poverty, food insecurity and mental health and ensure that this is incorporated mindfully into the national plan.** Actions underway and planned will only be effective and sustainable so long as people have support for their mental health, which is likely to have suffered as a result of experiencing food insecurity.

Dignified food access

Thinking about dignified food access, leads us to consider some of the images that we saw in the media during the pandemic such as the image taken by a soup kitchen volunteer in George Square in Glasgow that showed more than 200 people queuing for food in freezing weather conditions. This was a stark reminder that while plans may be underway to tackle poverty there is still a long way to go and reminded us of society's reliance on charities and volunteers to feed the poor and hungry. This was a visual representation of people being forced to access food in the most undignified of ways.

In contrast to this, making making cash grants available to people in need implies a sense of trust in the recipient to choose how to feed themselves and their families that food aid does not²⁵. Most people who are facing financial crisis and driven to food bank use do not get a choice in the food they eat or what they feed their families. The use of food parcels and vouchers normalises food aid and takes away people's ability to make their own decisions. This carries an assumption that people living in poverty who turn to food banks cannot manage their money and bear some level of responsibility for their crisis situation. This ignores the structural causes of poverty over which individuals have no control such as rising living costs, insecure work and inadequate social security payments.

Research into the impact of cash-first approaches has revealed that people find using food banks humiliating, whereas accessing emergency cash provides more choice, less waste and budgeting opportunities²⁶. It has been demonstrated more broadly that austerity policies have had a psychological impact on those with direct experience, with mental health effects including humiliation and shame; fear and distrust; instability and insecurity; isolation and loneliness; and feeling trapped and powerless²⁷. These experiences have been found to increase mental health problems. Accessing food parcels and using food vouchers involve answering questions and involve the fear of being rejected whereas cash offers choice and autonomy to buy what people actually want and need. **The Foundation supports cash-first as a more dignified approach that results in less stigma and shame, does not normalise food banks and does not expect volunteers to compensate for the lack of income that leads to food insecurity.**

We recognise that cash-first approaches are not a long-term solution to providing dignified access to food. The key to developing sustainable responses to food insecurity will rely on working in partnership with specialist organisations that can create awareness, understanding and deliver educational programmes that reveal the truths about food scarcity in the wider context of the food system. The Scottish Government's work with Nourish Scotland and the Poverty Truth Community to facilitate a Dignity Peer Network that delivers workshops and develops tools and resources about how to engage with the Dignity Principles in practice are recognised by the Foundation as foundational to creating sustainable change in the way we perceive and access food.

²⁵ <https://www.theguardian.com/commentisfree/2021/nov/22/cash-food-parcels-empower>.

²⁶ <https://www.theguardian.com/commentisfree/2021/nov/22/cash-food-parcels-empower>.

²⁷ <https://repository.uel.ac.uk/download/bfa6d36a930832f3d06a2785523c79daab2bfaaa2525dd8701f84f0f8ebddd3b/11123876/paa-briefing-paper.pdf>.

The Foundation recommends that the Scottish Government continues to invest in these partnerships and provide funding (for example through FareShare Scotland) to support community organisations across Scotland's 32 local authority areas not only to adopt dignified working approaches in practice and access high quality surplus food, but also to equip communities to build capacity and deliver training that involves local people in growing food, reducing waste, helping the environment and improving knowledge about the food that we eat.

These initiatives are largely underfunded and rely on volunteers, yet they can provide valuable skills development opportunities within communities and act as a social catalyst whereby local residents unite to learn, cook and eat together. Evidence shows that holistic programmes that educate people about how to live sustainably, improve their health and take ownership over their lives through food are linked to better mental health outcomes.

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? [Open comment]

Robust measurement methods will need to be implemented in order to monitor the success of the national plan. The intended outcomes of the plan are clear as are the indicators developed to measure change (progress towards outcomes).

The Mental Health Foundation supports the use of clear outcomes and indicators to measure the progress and impact of actions in the national plan. We understand that steps have been taken to change how food insecurity is measured nationally in Scotland, removing the current Food Insecurity Experience Scale questions that have been included in the Scottish Health Survey since 2017, and alternatively using questions from the US Department for Agriculture Scale (USDA) in the UK-wide Family Resources Survey to measure food insecurity across the UK.

We believe that this could be problematic for a number of reasons:

- Data collected since 2017 through the Scottish Health Survey has begun to create a picture of how lack of money to afford food affects people in Scotland. Discontinuing data collection in the same way could mean that this learning becomes somewhat redundant.
- Moving the food insecurity questions into the Family Resources Survey, which is UK-wide, is likely to result in a smaller Scottish sample which may not provide the volume and depth of data that has been collected through the Scottish Health Survey to date.
- Collecting food insecurity data from Scottish respondents through a UK-wide survey risks losing the nuances that are possible to detect through a Scottish national survey, for example similarities and divergences in experiences between different areas of Scotland. Retaining the ability to understand how people experience food insecurity between and within nations is strongly recommended.
- The aim of the Scottish Health survey is to collect data that furthers the public health agenda, whereas the purpose of the Family Resources Survey is to inform the development of social welfare policy. We believe that the former methodology aligns more closely with the Scottish Government's human rights-based approach to eliminating the use of food banks underpinned by dignity.

In terms of the scales used to measure food insecurity in Scotland, it is our view that if the Food Insecurity Experience Scale is replaced by the USDA, or otherwise, all items on the scale should be incorporated into the survey. These scales are generally intended to be used in their entirety and not as separate items, as the latter approach risks misinterpretation of the severity of food insecurity experienced by respondents.

The Food Insecurity Experience Scale is currently more widely used globally than the USDA scale from the evidence available. Therefore, using the USDA scale may present limitations in terms of drawing international comparisons about household food insecurity, should the Scottish Government wish to do so.

The Foundation recommends that further consideration be given to the methodology for measuring food insecurity in Scotland and would be keen to be a part of this discussion. Further, we recommend that evaluation of the national plan for ending the need for food banks includes questions about mental health stigma and discrimination because these concepts are so closely linked to experiences of poverty and food insecurity as demonstrated by the evidence available.

This would enable analysis of the interrelationship between food insecurity and mental health stigma to allow us to develop a national understanding and to further strengthen the evidence base for ending the need for food banks as a primary response to food insecurity.

6. Is there anything else that you think should be considered in the development of this plan? [Open comment]

Community-based responses

The Foundation supports community-based responses supported at national and local level to end the need for food banks as a primary response to food insecurity.

For example, the Edible Estates initiative in Scotland creates growing projects in council estates working collaboratively with organisations to support people to grow fruit and vegetables in their own communities, increasing environmental sustainability and supporting the development of local community resilience. The core aims of Edible Estates are to encourage people to invest in and develop a sense of pride in where they live, take part in social activities, meet new people, learn new skills and improve their health and wellbeing²⁸. Community growing can give people a purpose and create community empowerment.

The Foundation recommends that initiatives such as these should continue to be championed and adequately supported by the Scottish Government and partners as a sustainable way in which to develop self-sufficient communities, in which people access healthy, local food that they have contributed to providing in a dignified way.

This will contribute to the reduction of social isolation and mental health improvement. The Community Empowerment (Scotland) Act 2015 that set out local authority duties to develop and deliver food growing strategies has not been far reaching enough in its implementation, as highlighted by a Scottish Parliament Committee in 2021, that found that not enough has been done to empower people from deprived backgrounds to take action in their communities²⁹. This report indicates that a lack of resources and support at grassroots level is hindering progress in empowering communities and more must be done to identify how to overcome barriers to engagement and participation.

Beyond the Scottish Welfare Fund and Covid-19 response and recovery funding that are crucial to enabling individuals, families and communities that were already struggling prior to the pandemic to recuperate and rebuild, the Mental Health Foundation strongly encourages the Scottish Government to be bold, forward looking and ambitious in the ways in which it leads structural change in systems, cultures and behaviours.

²⁸ <http://www.edibleestates.co.uk/about/>.

²⁹ <https://archive2021.parliament.scot/newsandmediacentre/117173.aspx>.

Led by lived experience

Tackling socio-economic inequalities is crucial if we are to reduce lack of access to high quality and nutritious food. It requires a human rights-based approach aligned with the PANEL principles to ensure that approaches proposed to reduce household food insecurity involve people who are directly affected, prioritising and supporting them to understand their rights and what this means in practice³⁰. When the social and material causes of poverty are tackled at source, raising living standards, income and levels of secure work, we are then more likely to see a fairer Scotland in which people don't want for food and regain the dignity of adequately providing for themselves and their families.

This aligns with the recommendations of the Dignity report that identified four principles to guide the design of dignified responses to food insecurity, including involving people with lived experience of food insecurity in decision making; recognising the social value of food; providing opportunities to contribute; and giving people the power to choose³¹. **The Foundation believes that a lived experience led approach should lie at the centre of this draft national plan alongside advice and guidance from those working on the frontline of emergency food aid.** There is a consensus that food banks are not a sustainable long-term solution to providing fair access to good, nutritious food, that would result in improved health and wellbeing outcomes.

Embedding mental health and tackling stigma

The Foundation believes that the stigma associated with poverty that results in household food insecurity should continue to be challenged. There needs to be greater awareness and understanding of the structural causes of poverty and food insecurity to break down the myths around the need to access emergency food aid and other essentials. The Foundation is currently developing programmes of research around poverty, economy and mental health, examining the impact of poverty and household food insecurity on mental health. These are growing areas of work for the Mental Health Foundation as there are gaps in the current evidence about the impact of poverty and food insecurity on mental health: how this affects mental health, the impact that it has on people's lives and behaviours and the associated stigma experienced.

³⁰ https://www.scottishhumanrights.com/media/1409/shrc_hrba_leaflet.pdf.

³¹ <https://www.gov.scot/binaries/content/documents/govscot/publications/independent-report/2016/06/dignity-ending-hunger-together-scotland-report-independent-working-group-food/documents/00502395-pdf/00502395-pdf/govscot%3Adocument/00502395.pdf>.