



Response to the Proposal for SNAP 2

General

1) Do you broadly support the idea of SNAP 2 and the contents of this draft proposal?

We broadly agree with and support the idea of SNAP 2 and the aim of creating a “Scotland where everyone can live with human dignity,” (p4). As an organisation, we support older people across Scotland, therefore we particularly support recognition of human rights of older people as a specific theme.

However, we believe there is a significant omission in the proposal for SNAP 2 – food. There is no discussion of the right to food in the Proposal for SNAP 2. The ‘Right to Food’ has been in international law since the Universal declaration of Human Rights in 1948. Specifically, “Article 25. (1) *Everyone has the right to a standard of living adequate for the health and well-being of himself and his family, including food*”.¹ A United Nations Special Rapporteur exists on the right to food, which defines:

*“the right to food is the right to have regular, permanent and unrestricted access, either directly or by means of financial purchases, to quantitatively and qualitatively adequate and sufficient food corresponding to the cultural traditions of the people to which the consumer belongs, and which ensure a physical and mental, individual and collective, fulfilling and dignified life free of fear.”*²

The Right to Food is central to multiple human rights, the Committee of Economic, Social and Cultural rights (1999) recognise, “*the right to adequate food shall therefore not be interpreted in a narrow or restrictive sense which equates it with a minimum package of calories, proteins or other specific nutrients,*” (p2)³. “*The human right to food is of crucial importance for the enjoyment of all rights,*” (p1)⁴. Thus, emphasising food is a fundamental need and human right in Scotland and is integral in ensuring “*everyone can live with human dignity,*” (p4). Food should therefore form a key aspect of SNAP 2. Greater recognition of the interconnectivity across Human Rights (and the themes in SNAP 2) is therefore also necessary.

2) How do you think you and your community could support SNAP 2 in the future?

See Question 4- What could you or your community do to support these actions?

¹ <https://www.un.org/en/universal-declaration-human-rights/index.html>

² <https://www.ohchr.org/EN/Issues/Food/Pages/FoodIndex.aspx>

³ Food and Agricultural Association (1999) Substantive issues arising in the implementation of the international covenant on economic, social and cultural rights. Online Available from: http://www.fao.org/elearning/Course/R1/en/pdf/CESCR_GC12.pdf

⁴ <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G99/420/12/PDF/G9942012.pdf?OpenElement>



Issues and Actions

3) First theme you wish to comment on

Theme 10 Older People's Rights

4) Comments

What has changed or needs updating in relation to this theme?

As previously recognised, food is a fundamental need and human right, our relationship with food is not static throughout our life-course and this must be reflected in proposal's for SNAP 2, as well as future policy. Food is connected to all issues highlighted in the proposal in relation to Older People's Rights. Therefore, we would be keen for Theme 10: Older People's Rights to be updated to include the right to food and recognise the unique challenges and needs associated with food for this social group, particularly in relation to the unacceptable prevalence of Malnutrition amongst older people in Scotland.

Malnutrition is a serious condition that occurs when a persons' diet does not meet their nutritional needs. The National Institute for Health and Care Excellence defines a person as being malnourished if they have⁵:

- A Body Mass Index (BMI) of less than 18.5kg/m²
- Unintentional weight loss greater than 10 percent within the past three to six months
- A BMI of less than 20kg/m² and unintentional weight loss greater than 5 percent within the past 3-6 months.

The latest community-based data estimates 1 in 10 people in the UK over the age of 65 are malnourished or at risk of suffering from preventable malnutrition.⁶ Older people are particularly at risk of becoming malnourished, particularly those over the age of 65.⁷ Malnutrition has a devastating impact on the physical health, wellbeing and quality of life of older adults.

*A Fairer Scotland for Older People-A Framework for Action*⁸, recognises one of the key issues affecting the health of older people in Scotland is tackling and preventing malnutrition in Older Age. "Older people are particularly at risk of becoming malnourished which can seriously affect their health and wellbeing". "Preventing malnutrition, and effective identification and treatment, can significantly improve the

⁵ National Institute for Health and Clinical Excellence. (2006) Nutrition support for adults: oral nutrition support, enteral tube feeding and parenteral nutrition. Available from: <https://www.nice.org.uk/guidance/CG32>

⁶ Malnutrition Task force (2017). State of the Nation Report: Older people and malnutrition in the UK today. Online. Available from: http://www.malnutritiontaskforce.org.uk/wp-content/uploads/2017/10/AW-5625-Age-UK-MTF_Report.pdf

⁷ <https://www.bapen.org.uk/malnutrition-undernutrition/introduction-to-malnutrition?start=1>

⁸ <https://www.gov.scot/publications/fairer-scotland-older-people-framework-action/>



quality of people's lives and reduce demand on health and social care services," (p23). Therefore, we would be keen to see explicit reference to malnutrition in SNAP 2, as a key issue affecting Older People's Rights. This is necessary to demonstrate commitment to tackling the high prevalence of this preventable issue and ensuring individuals have a right to food, whatever their life-stage and individual circumstances.

Social Care is intrinsically connected to food and the specific issue of malnutrition in older age, over 80% of individuals who received meal support in 2017, through Social Care, were over 65.⁹ 6,390 people received meal services, according to the 2017 census, with recognition in the census, in reality this number is likely to be higher. Therefore, the additional issues identified in the proposal for SNAP 2 including, "the rising eligibility criteria for access to social care" and "the impact of high turnover in the social care workforce" are directly connected to accessing food and Older People. This theme and its actions must therefore be directly connected to and work in partnership with Theme 24: Social Care and Right to Independent Living. For instance, with a social care system which is supplemented by unpaid carers (657,300 people according to the Scottish Household Survey 2007/08)¹⁰ and informal support. The system must be sustainable, delivery of carers rights, will allow carers to meet the needs of the Scottish population, and ensure people have holistic individual care, that provides them with a right to food.

As an organisation we recognise the potential challenges and risks associated with technology use for the older population and welcome inclusion and identification of this in the proposal for SNAP 2. However, as Age UK's 'Technology and Older People Evidence Review'¹¹ also demonstrates, "the use of technology for enabling social contact for participation can be very successful". For instance, allowing people to continue to have personal choice and autonomy through ordering their weekly shop online. Therefore, whilst ensuring the risks are managed, increasing accessibility and widespread use of technology can help tackle other issues that affect Older People's Rights, we would welcome recognition of the opportunities technology can provide for Older People in Scotland; whilst considering accessibility, safety and inclusivity.

We welcome recognition that access to food can be dependent on financial means for some Older People. However as recognised by the Food and Agricultural Association¹² this is not the only reason an individual may struggle to access food, "Food security exists when all people, at all times, have physical, social and

⁹ <https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2017/12/social-care-services-scotland-2017/documents/00529425-pdf/00529425-pdf/govscot%3Adocument/00529425.pdf>

¹⁰ Audit Scotland (2014) Reshaping care for older people Online. Available from: https://www.audit-scotland.gov.uk/docs/central/2014/nr_140206_reshaping_care.pdf

¹¹ https://www.ageuk.org.uk/documents/en-gb/for-professionals/computers-and-technology/evidence_review_technology.pdf?dtrk=true

¹² www.fao.org/economic/ess/ess-fs/en/



economic access to sufficient, safe and nutritious food which meets their dietary needs and food preferences for an active and healthy life.” Food Security includes physical accessibility- the presence of shops, accessibility of shops; the wider social benefits associated with food, as well as individual choice- including cultural and dietary needs. The Food Train 2019 Member Survey¹³ demonstrates, transport, mobility, health, absence of family/ friends are also factors that prohibit our members from accessing food and requiring use of The Food Train services. Theme 10: Older People’s Rights must be updated to recognise not only the overall right to ‘some/any’ food, but the social, physical, economic right to food. This requires an active acknowledgement of the intersectionality of the term ‘Older Person’ – recognising the range of individual needs within this category. For instance, in relation to geographical location. There is *“geographical variation in the ageing of the population within Scotland. In general, it is lowest in the cities and higher in more rural areas”*.¹⁴

The recognition that loneliness and social isolation disproportionately affect older people is an important inclusion in the SNAP 2 proposal, as also recognised by *A Fairer Scotland for Older People*¹⁵ and *A Connected Scotland*¹⁶, however, we would welcome acknowledgement that this issue is directly connected to food and the prevalence of malnutrition amongst older people. For instance, The Food Train 2019 Member survey demonstrates 85% of our members live alone, and thus typically eat alone. According to *A Connected Scotland*, *“Evidence suggests that over a third of people in Scotland live alone, and 40% of adults who were living alone in 2017 were of pensionable age.”* This has direct connection to food. There is extensive international research and academic recognition that feelings of loneliness increase the risk of malnutrition amongst older people. In a study of persons aged 75 years and older, Eskelinen, Hartikainen and Nykaken (2016)¹⁷ found, *“frequent feelings of loneliness... were associated with the risk of malnutrition/malnutrition,”* amongst older people. Therefore, the actions of SNAP 2 must recognise the interconnected nature of the issues affecting Older People’s rights in Scotland. Food must be central to this if we are to ensure delivery of Older People’s rights, including the right to food, whilst reducing the prevalence of preventative issues, including malnutrition and loneliness.

Is there something else you think SNAP 2 should do?

¹³ <https://www.thefoodtrain.co.uk/images/documents/2019MemberSurveyReport.pdf>

¹⁴ <https://www.gov.scot/publications/fairer-scotland-older-people-framework-action/>

¹⁵ <https://www.gov.scot/publications/fairer-scotland-older-people-framework-action/>

¹⁶ <https://www.gov.scot/publications/connected-scotland-strategy-tackling-social-isolation-loneliness-building-stronger-social-connections/>

¹⁷ Eskelinen, K., Hartikainen, S. and Nykanen, I. (2016). Is loneliness associated with malnutrition in older people? *International Journal of Gerontology*. 10(1). <http://dx.doi.org/10.1016/j.ijge.2015.09.001>



- SNAP 2 should work in partnership with *A Fairer Scotland for Older People- A Framework for Action* to publicly acknowledge Malnutrition and 'right to food' as a human rights issue affecting older people in Scotland.
- In relation to this, SNAP 2 should explore existing models of support across Scotland in relation to older people and Right to Food. SNAP 2 should focus on the development of preventative strategies to reduce the level of malnutrition amongst older people in Scotland.
- In relation to social care, SNAP 2 should recognise the right to food is a key aspect to social care provision for Older People in Scotland. SNAP 2 should ensure as part of the Health and Social Care Integration, the human right to food is prioritised and delivered, by ensuring provision recognises the challenges to eating and accessing food in older age.
- SNAP 2 must recognise accessing food is not based solely on financial means. SNAP 2 must consider what social, cultural, dietary and physical factors affect the delivery of the right to food and other human rights for Older People in Scotland. SNAP 2 must recognise – the intersectional nature of the category 'Older Person' and ensure all actions do not consider this term as homogenous but as diverse. Different actions will be necessary to meet different individuals' needs.
- SNAP 2 must consider what opportunities technology can provide to tackle human rights affecting Older People, rather than see it solely as a risk, including in relation to loneliness and social isolation, as well as Theme 11: Personal Choice and Autonomy.
- In relation to loneliness and social isolation this should include recognition that eating with others is inexplicably linked to an improved wellbeing, (Pettigrew, 2007)¹⁸. For instance, people that often eat together/ more socially often feel happier (Dunbar, 2017).¹⁹ SNAP 2 should work with Health and Social Care Boards to reduce the pressures on carers, with a focus on providing greater time per individual and individual, holistic care, taking pressure off the 657,300 un-paid careers. SNAP 2 should ensure the right to food is a key focus of the change in the current Free Personal and Nursing Care (at home) legislation. This should include clarification of food within care at home.
- A preventative approach to tackling malnutrition, delivers a human right to food whilst being cost-effective. The cost of malnutrition in England alone is estimated to be £11.9 billion in 2011-2012.²⁰ SNAP 2 should also work alongside the *A Connected Scotland-Our strategy for tackling social isolation*

¹⁸ Pettigrew, S. (2007) Reducing the experience of loneliness among older consumers. *Journal of Research for Consumers*. 12.

¹⁹ Dunbar, R. (2017). Breaking bread: The functions of social eating. *Adaptive Human Behaviour and Physiology*. 3(3), 198–211.

²⁰ <https://www.bapen.org.uk/malnutrition-undernutrition/introduction-to-malnutrition?start=5>



*and loneliness and building stronger social connections*²¹ to ensure the links between food and wellbeing are built in and recognised across all policy.

- As outlined in the previous question, we believe these actions should be interconnected to other themes- namely Theme 24: Social Care and Right to Independent Living and Theme 11: Personal Choice and Autonomy.

What could you or your community do to support these actions?

The Food Train supports the establishment of a UN Convention on Rights of Older People and the establishment of an Older People's Commissioner for Scotland role. We suggest the Right to Food would form a key part of the convention and role, as demonstrated in this response food intersects and is vital to delivering multiple human rights for Older People. The Food Train team would happily be an active part of discussions that open-up this dialogue across the Human Rights themes of SNAP 2. The Food Train has over 2000 older adult customers, who could be consulted with as part of this process. The Food Train has been in existence for 25 years in 2020, as an organisation we have vast practical and research experience to draw on and influence the establishment of a UN Convention on Rights of Older People, which must include older people's voices, charities and organisations across Scotland who support and work with this social group. The Food Train is part of an existing network of partnerships across the UK and Scotland, we could activate our network to ensure this collaborative focus is emphasised, with the necessary skills and expertise.

The Eat Well Age Well Project, as part of the Food Train, is working to tackle malnutrition amongst Older People in Scotland. As part of this work Eat Well Age Well is:

- delivering training to carers, volunteers and health and social care staff to identify malnutrition so early action can be taken
- providing seed funding to local projects such as lunch clubs which we know are cost effective and help make a difference to the lives of older people
- raising awareness of this hidden problem
- conducting research to better understand the problem
- testing simple innovations in the community

At the heart of this work is working with older people themselves and community groups and wider stakeholders to prevent, detect and treat malnutrition. Eat Well Age Well has extensive knowledge of community-led means of preventing malnutrition. In partnership with the University of Glasgow, Eat Well Age Well is conducting research to assess older adults' nutritional and wellbeing outcomes associated with ageing in place with supported accessibility.²² Preliminary findings of

²¹ <https://www.gov.scot/publications/connected-scotland-strategy-tackling-social-isolation-loneliness-building-stronger-social-connections/>

²² <https://www.eatwellagewell.org.uk/images/ResearchSummary.pdf>



this research have found food security is not just down to financial barriers, amongst Older People in Scotland²³. The preliminary research findings emphasise the importance of considering food in relation to the issues of loneliness, social isolation and food insecurity. The publication of this research in spring 2020 will be ground-breaking and influential in this area of work. Eat Well Age Well has developed an extensive research base, findings of which could be used to inform the future of necessary work of SNAP 2 to ensure Older People's rights are delivered across Scotland, particularly the right to food.

The Food Train is exploring options to utilise technology positively amongst older people in Scotland to help realise their right to food, whilst providing personal choice and autonomy. For instance, giving Food Train members the choice whether to pay by cash or card as part of our delivery service. This is an area of work we believe is important, rather than solely focusing on the risk of technology. We would work with SNAP 2 on considering how technology could be an opportunity to realise the right to food for Older People in Scotland.

Delivery, Governance and Resources

13) What do you think about the proposed delivery, governance and resources model for SNAP 2?

We broadly support the proposed delivery, governance and resourcing framework proposed for SNAP 2.

- **Delivery-** We support the collaborative approach of the proposed structure of delivery of SNAP 2. The proposal of including multiple stakeholders and partners is a positive step to ensuring that SNAP 2 is adequately resourced. We would welcome delivery groups that are both thematic and action based. Overarching thematic delivery groups will ensure there is specific focus and recognition of each of the Human Rights recognised in SNAP 2 and ensure representation of each of the 25 themes. But we believe smaller action-based delivery groups will ensure Stakeholders and partners can focus their expertise on actions appropriate to their field of work, whilst also contributing to the Overall theme. We also believe it is important to facilitate dialogue and action across the themes. For instance, as recognised previously, the interconnection between Theme 10: Older People's Rights and Theme 24: Social Care and Right to Independent Living. Human Rights are cross-cutting and interconnected, so creating a delivery model that allows for these connections to be recognised and actions to be delivered that recognise multiple themes is a necessary step.

²³ <https://www.eatwellagewell.org.uk/images/6KeyFindings.pdf>



- Governance- We support the inclusion of a range of stakeholders who offer different experiences within the formal governance structure of SNAP 2. The inclusion of ‘rights holders with lived experience of human rights issues’ is positive. However, adaption and adjustment to ensure inclusion of these individuals would be a welcome step to ensure representation of ‘rights holder with lived experience of human rights issues’ across the 25 themes, in the SNAP 2 process. For instance, for inclusion of Older People within the process, and ensuring individuals have the opportunity to comment in community settings, not just parliamentary settings. As well as ensuring outcomes and resources are widely accessible- such as not solely being online, offering larger font publication etc.
- Resources – We note the Independent Evaluation concluded that SNAP 2013-2017 was under-resourced compared to other nations, “SNAP is under-resourced by the State compared with National Action Plans globally. State investment could address many of the issues outlined here,” (p61)²⁴. We support recognition of a commitment to financial support from the Scottish Government for delivery of the proposed actions. We suggest this would extend to additional actions outlined in the public proposal consultation, where appropriate, to ensure the actions of SNAP 2 are adequately resourced and deliverable.

14) How do you think SNAP 2 should connect with the Scottish Government’s National Task Force on Human Rights Leadership?

We believe the creation of the National Task Force on Human Right’s leadership in 2019 is a positive step towards ensuring human rights are put into practice in Scotland. Both bodies should be open to sharing resources and facilitating an open dialogue between their work. The monitoring and evaluation process proposed by the Scottish Government’s National Task Force on Human Rights leadership should ensure actions established by SNAP 2 are held accountable in law, through the establishment of an Act of the Scottish Parliament to provide Human Rights leadership.

15) How do you think SNAP 2 should engage with the Scottish Parliament?

In her evaluation of SNAP, Dr. Jo Ferrie recognised, “*there have been examples of commitment and support from the Scottish Government, but this does not appear to be consistently given, and has reduced over time,*” (p68)²⁵. We welcome the recommendation “*in a second phase of SNAP is to have a Minister of the Scottish Parliament attend SNAP meetings at times. This level of engagement could enhance the reputation of SNAP, and build legitimacy for the work done,*” (p54). We would

²⁴ <http://www.snaprights.info/wp-content/uploads/2019/07/SNAP-Evaluation-vFinal-16-July-2019.docx>

²⁵ <http://www.snaprights.info/wp-content/uploads/2019/07/SNAP-Evaluation-vFinal-16-July-2019.docx>



also welcome active involvement in the delivery of the actions of SNAP 2 from MSP's with direct responsibility for specific human rights outlined in the SNAP 2 proposal, such as Christina McKelvie- Minister for Older People and Equalities.

About you

16) What kind of organization do you represent?

Third Sector

17) Which areas of the country do you come from or represent?

The Food Train works across Scotland, providing a necessary lifeline and valuable practical support to older people in nine regions- Dumfries and Galloway, West Lothian, Stirling, Dundee, Glasgow, Renfrewshire, the Scottish Borders, East Renfrewshire and Clackmannanshire.²⁶ The Food Train also has National reach through the national neighbourhood meal-sharing service, Meal-Makers²⁷ and the 'Eat Well, Age Well'²⁸ project which works to tackle malnutrition in older people living at home and operates throughout Scotland.

18) What communities of interest do you represent?

The Food Train works to proactively assist older people at their time and point of need, helping those wishing to live independently at home. The Food Train projects support individuals from the age of 55, through the Meal-Makers sharing project. The largest proportion (41.1%) of Food Train customers according to the 2019 annual survey²⁹, are aged between 85 years and 94 years, with 4.3% of customers being 95 years plus. According to our Annual Survey, the majority of individuals Food Train support live alone (85%).

19) Would you like to be kept informed about the future development of SNAP 2

Yes

If answered yes, please leave your name and email address here:

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²⁶ <https://www.thefoodtrain.co.uk/>

²⁷ <https://www.mealmakers.org.uk/>

²⁸ <https://www.eatwellagewell.org.uk/>

²⁹ <https://www.thefoodtrain.co.uk/images/documents/2019MemberSurveyReport.pdf>