Business and Regulatory Impact Assessment

The Welfare Foods (Best Start Foods) (Scotland) Regulations 2019

1. Purpose and intended effect of the Best Start Foods

1.1. Objectives

Best Start Foods aims to support low-income pregnant women and families with children under the age of three, on certain benefits, with the costs of providing a healthy diet.

By providing continuous support throughout pregnancy up until a child turns three, Best Start Foods aims to promote maternal and infant wellbeing, tackle inequality and contribute to early intervention in establishing healthy eating habits. Best Start Foods also intends to lessen the stigma around the current UK Healthy Start Voucher scheme by replacing existing Healthy Start Vouchers with a prepaid payment card in Scotland alongside increasing healthy food choices available to recipients of the benefit.

1.2. Background

Section 27 of the Scotland Act 2016 devolved the powers in relation to the Welfare Foods schemes, which includes Healthy Start Vouchers, Healthy Start Vitamins and the Nursery Milk scheme. This BRIA focusses on the scheme that will replace Healthy Start Vouchers in Scotland, the Best Start Foods scheme.

The Programme for Government 2016 also stated that the Scottish Government will streamline the application process for the replacement scheme for Healthy Start Vouchers and the Best Start Grant. This will create a single application form for both benefits and has the potential to increase and improve the effectiveness of support to parents. Best Start Foods, will be one of the first wave of benefits to be delivered by the Social Security Scotland in Summer 2019.

1.3. Rationale for Government Intervention

The Scottish Government is committed to tackling inequality and improving the health of our nation. One of these challenges is how best to ensure everyone has access to a healthy diet. Through devolving the powers over Welfare Foods the Scottish Government is committed to improving policies to better meet Scotland’s dietary and nutritional needs, and to reduce the considerable health inequalities that exist.

Promoting the health of children and their families is one of the Scottish Government’s five strategic aims which seeks to help people to sustain and improve their health, especially within disadvantaged and vulnerable communities. Early intervention and prevention initiatives are fundamental as
a healthy start lays the foundation to a healthy future. Establishing good nutrition, healthy diet and positive eating habits in infancy is important as good practice can be taken forward into childhood and throughout adult life.

Maintaining a healthy weight is key for both physical health and mental wellbeing. The Healthy Start Voucher scheme is the only government scheme to directly influence eating habits in the early years and is, therefore, key to preventing obesity.

There is strong and growing evidence of the impact of diet in the early years on longer term outcomes. Some recent research has shown that early educational attainment is negatively correlated with poor diet at home before the age of three. In addition, a wide range of clinical evidence from the British Medical Association (BMA) and the Scientific Advisory Committee on Nutrition (SACN) has established the connection between poor early nutrition and an increased risk of chronic disease in later periods of life.

Best Start Foods will contribute to fulfilling the Scottish Government’s National Outcomes and will specifically contribute towards the following outcomes:

- We are healthy and active
- We tackle poverty by sharing wealth and opportunities

Devolving Welfare Foods and creating the new Best Start Foods scheme in Scotland also provides the Scottish Government with the opportunity to address the bureaucracy associated with the current scheme and to deliver a number of improvements:

- Simplifying the application process
- Introduce awareness raising initiatives to increase uptake of the scheme to ensure families can access affordable, nutritious food at the point of need.
- Developing the Best Start Foods scheme to be delivered in a way that ensures dignity and respect for its recipients by moving to a pre-paid payment card, thus reducing the stigma associated with the current paper vouchers. The payment card also removes the need for retailers to register for reimbursement as they will be paid at the point of sale.
- Increasing the Best Start Foods payment from £3.10 to £4.25, per eligible person, per week to increase support for low income families.

2. Consultation

2.1. Public Consultation
A formal public consultation on Welfare Foods ran from 5 April 2018 to 28 June 2018. Respondents were invited to comment on proposals to improve support for low income families with young children to purchase healthier foods. The proposal included replacing Healthy Start Vouchers with a new Best Start Foods prepaid card, increasing financial support and expanding the range of food available through the new Best Start Foods scheme. 147 consultation responses were received.
The consultation papers were made available on the Scottish Government’s website: https://www.gov.scot/publications/welfare-foods-consultation-meeting-needs-children-families-scotland/.

2.2. Retail Stakeholders

Extensive engagement has taken place with retailer representative groups: Scottish Retail Consortium (SRC), Scottish Grocers Association (SGA) and the National Federation of Retail Newsagents (NFRN). These groups were invited to respond to the consultation. 4% of consultation responses came from businesses, including these representative groups alongside private or independent businesses.

In addition, specific questions were constructed following the public consultation and asked, in relation to this BRIA, at a meeting of the Short Term Working Group on Welfare Foods on 4 September 2018, and at a meeting of retail representatives on 26 September 2018. The key comments received from attendees were:

- Initial training and continuous support is required for retailers to understand the new system, how it works, eligible foods and how the prepaid card payments are made.
- There is a risk that retailers without card payment facilities would be excluded from the system.
- Retailers are limited in the space available for promotional materials.
- Some concerns were raised over connectivity issues for retailers in rural areas.
- Some initial concerns were raised around retailers operating close to the English border where English residents may want to use a shop in Scotland and vice versa.
- Retailers do not want to be responsible for policing appropriate use of prepaid card.

2.3. Independent Retailer Engagement

The Scottish Government have undertaken engagement with independent retailers both currently registered under the Healthy Start Voucher scheme and those not registered to assess the impact of a new Best Start Foods payment card on their business.

Consultation took place between December and May 2019 with 12 small scale local retailers across Scotland visited by the team. The areas surveyed were Leith and North East Glasgow. All high areas of multiple deprivation that would be likely to have a customer base that could use Best Start Foods payment card.

Retailer responses were widely positive with some common themes:

- Retailers felt replacing Healthy Start Vouchers with a prepaid card would have a positive impact on their store as the current paper
scheme took too much of their time and resources.

- Retailers also commented that the payment card would ensure both retailers and recipients do not lose out, as they often do with the current scheme if the vouchers become damaged or out of date.
- All of the retailers consulted had card payment facilities, with a range of minimum spend including £1, £5 and £10, many of the retailers had no minimum spend or were flexible on the approach,
- There was a consensus that as the prepaid card works like a standard chip & pin payment card they would not require additional guidance or support from Scottish Government.

Some concerns noted from small retailers:

- Some retailers were still unsure of the policy of not ‘policing’ the goods being purchased with the payment card.
- One particular retailer in a high deprivation area in Glasgow also did not have a card reader. This was surprising, as the shop had been a post office previously, however the shopkeeper highlighted that the banking charges for such machines were too much for his business. There might also be too much competition in this area now as there are two big supermarkets nearby and the shop did not stock some of the grocery provisions that would be expected for Best Start Foods.

2.4. **Short Term Working Group on Healthy Start Vouchers**

The Short Term Working Group offered insight into the current Healthy Start Voucher scheme and helped shape the proposals for Best Start Foods as set out in the public consultation. They acted as a point of contact between the Scottish Government, local authorities, health boards and third sector to advise, at a strategic level, on the action required to adequately support low income families with young children in improving their diets.

At the time of consultation, the Short Term Working Group on Welfare Foods included the following representatives:

- Convention of Scottish Local Authorities (COSLA)
- Scottish Council for Voluntary Organisations (SCVO)
- Trussell Trust
- NHS Borders
- NHS Dumfries and Galloway
- Fareshare
- Scottish Local Government Partnership (SLGP) (South Lanarkshire)
- NHS Greater Glasgow and Clyde
- Scottish Women’s Aid
- NHS Tayside
- NHS Grampian
- Voluntary Health Scotland
- Child Poverty Action Group (CPAG)
- Healthy Start Alliance
The views of the group have also helped to shape further stakeholder engagement on Best Start Foods from an operational perspective.

2.5. **Within Government**

The consultation was made available to Scottish Government policy areas including Creating Health, Social Security (including Low Income Benefits and Best Start Grant) and Legal Services.

Information gathering has also been conducted with UK counterparts in the Department of Health and Social Care, in terms of the existing Healthy Start system and the legislative requirements of devolving powers to Scotland and the transitional arrangements. Further information collaboration has also taken place with the Department of Health and Social Care, Department of Work and Pensions and HMRC around the operational aspects of the Best Start Foods scheme.

2.6. **Other Public Bodies**

Local Authorities, NHS Boards and other public bodies were also included in the public consultation invitation. 22% of responses came from NHS Boards and 18% of responses from Local Authorities.

3. **Options**

3.1. **Do Nothing**

Section 27 of the Scotland Act 2016 Act came into force on 8 February 2019, devolving the functions relating to the subject-matter of section 13 of the Social Security Act 1988, which includes the Healthy Start Voucher scheme. Not taking forward the powers for a new replacement scheme (Best Start Foods) is therefore not a viable option. Furthermore, there would be no benefits from maintaining the status quo.

If the Department of Health and Social Care stopped administering Healthy Start Vouchers to Scottish applicants, and the Scottish Government did not provide a replacement scheme then around 20,000 pregnant women and children would be worse off every week as they would no longer receive support to purchase healthy foods.

3.2. **Introduce benefit on same basis as current HSV scheme:**

This approach would devolve the Healthy Start Voucher scheme to Scotland but make no changes in terms of eligibility, level of payment, application process or integration with other benefits. This ‘lift and shift’ approach would be inconsistent with the Programme for Government (2016) commitment, set out on page one, whilst ignoring the opportunity devolution provides.

Furthermore, this approach misses the opportunity to shape the support available to meet the needs of the people of Scotland, and fails to ensure the
available schemes help those most in need. By making no changes to the administration of Healthy Start Vouchers the Scottish Government would not be adequately supporting families to access affordable, nutritious food. Retaining this system would also entail the Scottish Government administering a benefit, at cost, that is viewed by stakeholders as ‘bureaucratic’ and ‘outdated’ with uptake as low as 41% in some parts of the country.

3.3. **Introduce Best Start Foods (recommended option)**

The Scottish Government proposes the following changes:

**Registration for Retailers**

Under the Best Start Foods scheme, retailers will no longer have to register in order for users to buy their healthy foods using their prepaid card. This will increase the choice of retailers that recipients can use. This change also has a positive impact on retailers, in that more retailers will be able to benefit from the scheme without the need to go through a registration and continuous reimbursement process. We will encourage existing retailers already registered to accept the HSV to continue to do so to benefit families visiting from other parts of the UK and to maintain services for retailers and customers on the border.

**Application Process**

The Scottish Government is proposing a change in the application process for users to bring it up to date and to make it more accessible. The proposed changes include enabling claimants to apply through an online process from start to finish. At the moment, Healthy Start applicants can fill out an application online but must then print and send the application via post, to a processing centre. At the moment, around 20% of claims are delayed or not progressed due to missing information (including, missing applicant or medical professional signatures, missing personal data or misunderstanding due to language barriers). The proposed changes to the application process simplify the process for applicants and there will be a number of alternative arrangements including translation services, large print and braille.

**Eligibility**

The Scottish Government is proposing a slight change to the eligibility for Best Start Foods when compared to Healthy Start Vouchers. Pregnant women on a qualifying low-income benefit will be able to apply from the moment they know they are pregnant, currently under the Healthy Start scheme women must be at least 10 weeks pregnant to apply, they must also have their midwife or a qualified health professional, sign their application form. The Scottish Government is proposing a change to this process, for the majority of Best Start Foods applicants, their pregnancy will be verified by the agency at 24 weeks using data from their Baby Box application. This will have a widely positive impact on applicants, at current the main cause of HSV
applications being declined is due to incomplete applications and a large proportion of these are missing a health professional's signature. This, in turn, will have a positive impact on health services as it decreases the time and resources spent completing these forms. For women who have chosen not to apply for a Baby Box, and this is believed to be a very small number of women, at current uptake is around 85%, they will be able to verify their pregnancy using a Mat B1 form.

Further proposed changes to eligibility also include, a slight increase in the qualifying benefits and decreasing the age range for eligible children from birth to 3 years old, as outlined below the increase in weekly payments mean children will be better off on a weekly basis, and over the course of their eligibility period when compared to the HSV scheme. This is to align with broader policies, including the increased number of hours for universal Early Learning and Childcare (ELC) provision for children aged 3 to 4, which will include a free meal, drink of milk and a healthy snack.

Prepaid card

The Scottish Government is keen to ensure that Best Start Foods is run in a way that ensures dignity and respect for its recipients. Best Start Foods will provide a prepaid card system, replacing the Healthy Start paper vouchers. This will help to reduce stigma. The prepaid card will benefit retailers as under the current scheme, users pay for their healthy foods using a paper voucher and the retailer then has to claim the costs for the foods back from the Department of Health and Social Care. Under the new scheme the retailers will be paid at point of purchase. This will save on administration costs and simplify the process from their perspective. During meetings with retailers some concerns were raised over independent retailers who may not have card payment facilities, however, the general consensus has been that the benefits of a prepaid card would outweigh the negatives for independent retailers as a whole. Furthermore, as the retail sector moves forward in digitalisation, we are seeing an increase in retailers with card payment facilities and as demand grows this is likely to grow.

Payments

Best Start Foods will provide a weekly payment, per eligible person, of £4.25 (which will increase to £8.50 for the first year of a child's life to support breastfeeding or the cost of infant formula) paid onto a prepaid card, as described above. Payments will continue until a child turns three years old, at which point they are eligible to enter the universal Early Learning and Childcare system therefore receiving access to healthy food through a free meal, healthy snack and drink of milk.

Under the current system, families receive £3.10 per eligible person per week, up until a child’s fourth birthday. The new system stops payments a year earlier but with higher weekly payments, each child will have received £1,011.50 over their first three years of life which is £112.50 more than they would receive, over their first four years of life, under the current system.
3.4. **Costs**

The Scottish Fiscal Commission (SFC) is responsible for producing independent forecasts of all Scottish Government expenditure. For Best Start Foods payments, the SFC will publish forecasts alongside the laying of the Welfare Foods (Best Start Foods) (Scotland) Regulations 2019.

Healthy Start Vouchers in Scotland costs in 2017-18 were £4.04 million and in 2018-19 were £3.7 million. The SFC will be publishing forecasts on 30 May 2019. Based on these forecasts the SFC has set out that:

- The expenditure for Best Start Foods (and Healthy Start Vouchers) during the 2019-20 transition year is likely to be around £5 million, rising to £6 million in 2020-21.

- Take-up rates are difficult to gauge, but are likely to be around 62% in 2019-20 rising to 68% in 2020-21.

As described above, payments will cease on a child’s third birthday, as opposed to their fourth birthday under the current system. This has a positive financial increase of £112.50 per eligible child, as this is over a condensed period of time each eligible recipient will see a financial increase of £60 every year.

For children in receipt of Healthy Start vouchers who are aged two or above when they transition, they will receive the new rate of payment until the age of four. This transitional protection will ensure these children will not be worse off under the new system.

4. **Scottish Firms Impact Test**

Scottish businesses and third sector organisations, were invited to respond to the Public Consultation on Social Security in Scotland prior to our Consultation on Welfare Foods. Responses to the Social Security consultation were received from 14 private businesses and 5 business organisations, all of whom requested their responses remain anonymous.

Scottish businesses, including the third sector, also responded to our Public Consultation on Welfare Foods during Spring 2018. Responses were received from private or independent businesses as well as representative groups.

Stakeholder meetings have continued post-consultation with retailer representatives as well as meetings with the Short Term Working Group, which were held before and after the consultation, in order to invite further comment and discuss findings of the consultation.
4.1. **Competition Assessment**

The Scottish Government does not believe that Best Start Foods will have an adverse impact on the competitiveness of Scottish companies or the third sector within Scotland or the UK.

Best Start Foods removes the necessity for retailers to register; at the moment only registered retailers can accept the Healthy Start Vouchers. The introduction of a prepaid card not only negates the necessity of a registration process, it also opens the choice of retailers up for Best Start Foods recipients.

The new policy removes the need for retailers to register for the system and it is therefore hoped that all retailers will be able to be part of the system, negating any issue of competition. The Scottish Government will continue to encourage registered retailers to remain registered with the wider UK scheme to allow Healthy Start recipients from the wider UK to use these in stores in Scotland, particularly those close to the border.

Consultation responses and views expressed at meetings indicate that there is potential that if a retailer did not have a card reader, they would not be able to be part of the system which may impact on competition. However recent retailer research findings have not raised this as an issue for retailers, the Scottish Government will continue to work with retailers on an ongoing basis should a need arise to work around this, ensuring an inclusive, universal approach which supports businesses and maximises choice for consumers.

Feedback from an engagement event with businesses on 26 September 2018 demonstrated a broad positive view of the policy, with it being noted that the true impact will not be known until the system is in place and we can learn from the lived experience of businesses. Many positive impacts were identified, such as increasing the ability to compete and that the scheme “may result in more retailers becoming involved in existing “Healthy Option Schemes” and those already participating may offer a more extensive range especially with the range of tinned products.” Potential negative impacts identified were around whether there would be merchant fees for card payments and how reconciliation would work.

Retailer research undertaken in early 2019 with a variety of small, independent retailers as well as large chain stores supported the findings from the engagement event above. General responses were positive that the prepaid card will save retailers time and resources.

Any procurement required to support the administration of the Best Start Foods scheme will be subject to the Public Contracts Scotland (2015) Regulations¹ (“the 2015 Regulations) and the Procurement Reform (Scotland) Act 2014² (“the 2014 Act”) which together provide a national legislative

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² http://www.legislation.gov.uk/asp/2014/12/contents
framework for sustainable public procurement which supports Scotland’s economic growth through improved procurement practice. The 2015 Regulations and the 2014 Act provide the statutory foundations for the Scottish Model of Procurement.

| Will the measure directly or indirectly limit the number or range of suppliers? | No |
| Will the measure limit the ability of suppliers to compete? | No |
| Will the measure limit suppliers’ incentives to compete vigorously? | No |
| Will the measure limit the choices and information available to consumers? | No |

### 4.2. Test run of business forms

No new forms will be brought in with the implementation of the proposed legislation for businesses.

### 5. Legal Aid Impact Test

#### 5.1. The introduction of the Welfare Foods (Best Start Foods) (Scotland) Regulations 2019 are unlikely to have legal implications in relation to the operation of the scheme. Within the other impact assessments we have tried to gather evidence from a large range of client groups who would use the services of Best Start Foods. The likelihood is that devolution of Welfare Foods will have little impact on legal aid, as there is not expected to be an increase in aid necessary as a direct result of Best Start Foods. All applicants to Best Start Foods will have the ability to request a review of any decision made on their claim and details of this will be laid out in Social Security Scotland operational guidance. This will not be included in our legislation and should have no further impact on Legal Aid.

### 6. Enforcement, sanctions and monitoring

Best Start Foods will be delivered by Social Security Scotland (the Agency) and the new prepaid card scheme will be monitored by them in partnership with the prepaid card provider.

In situations of overpayment due to infant loss or pregnancy ending in anything but a live birth, miscalculation or genuine error, we have no intention to pursue any recovery.

The Scotland Act 2016 devolves the Welfare Food powers allowing the creation of the Best Start Foods scheme, we will be replicating some of the offences similar to those under the current Healthy Start Voucher scheme. In
cases of Best Start Foods overpayments, our policy fall in line with the Scottish Public Finance Manual – see: https://www2.gov.scot/Topics/Government/Finance/spfm/overpayments, therefore policy on fraud and overpayments will be set out in operational guidance.

Offences include:

a) an offence of failure to notify a change in circumstances which affects eligibility for Best Start Foods; and

b) an offence of making dishonest representations for obtaining Best Start Foods.

c) an offence of failing to comply with regulation 16, which provides that the payment card remains the property of Scottish Ministers and any individual in possession of the card should produce or deliver it to Scottish Ministers within such a time as they may direct.

The offences will mirror the UK penalties, for a) and c), the penalty is a fine not exceeding level 3 on the standard scale (currently £1,000) and for b) the penalty is a fine not exceeding level 5 on the standard scale (currently £5,000) or imprisonment for a term not exceeding 3 months, or both.

7. Implementation and delivery plan

Public Procurement of the prepaid card provider has been undertaken in line with Scottish Government Procurement policies and the prepaid card provider is now in place. Best Start Foods is expected to go live in Summer 2019 with a pilot exercise undertaken between April and June 2019.

The pilot exercise focused on existing Healthy Start Voucher recipients in the TD postcode area (Scottish Borders) and offered the opportunity to engage with local businesses, retailers, public sector and third sector organisations about any effect the differences in Best Start Foods might have. The findings from this pilot will feed in to the continuing improvement of the policy and its implementation.

There will be ongoing evaluation of the policy as it develops.

8. Summary and recommendation

As a result of the assessment it is clear that improvements to the existing scheme are necessary to bring the replacement scheme for Healthy Start Vouchers, Best Start Foods, up to date. By introducing a prepaid card, Scottish Government believes the impact on retailers will be widely positive. The possible impact on smaller businesses and availability of card payment facilities will be assessed regularly once Best Start Foods is live in order to ensure these businesses benefit from the new scheme. The reduction in time spent conducting administrative work associated with Healthy Start Vouchers, the reduction in delay to payment as they will no longer have to claim compensation and the withdrawal of paper vouchers removes the possibility of damage resulting in voids that retailers cannot be reimbursed for.
Furthermore, it is expected that the recommended replacement scheme would encourage competition, especially for local retailers as they will no longer have to register for the scheme. The impact of this will also mean more choice for recipients of the benefit, who will be able to use their prepaid card in any food retailer.

9. Summary costs and benefits table

<table>
<thead>
<tr>
<th>Option</th>
<th>Total benefit per annum: - economic, environmental, social</th>
<th>Total cost per annum: - economic, environmental, social - policy and administrative</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>The policy identified that a significant part of life for families on low incomes is suffering from limited financial support to maintain a healthy diet.</td>
<td>Financial support for families is insufficient in supporting them to provide/maintain healthy diets during pregnancy and for their children. The provision of additional financial support by increasing the value of Best Start Foods to £4.25 per week alongside making the payment card more accessible to families in the way it can be used to try to alleviate the potential stigma of vouchers is hoped to support an increase in the uptake of the benefit. Once the card is established we will use our links with other government policy teams to ensure that we can help to address the dietary choices made by providing some recipe advice for the Best Start Foods.</td>
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<tr>
<td>2</td>
<td>As set out on page 4, the change in benefit received per child from the current to the new system would be £112.50 across the lifetime of their entitlement, the benefit will increase by £1.15 per week for each eligible person. Resource and time savings for Health professionals, who will spend less time completing administrative tasks associated with the Healthy Start Voucher scheme, as they will no longer be required to counter-sign the application form. Families would have access to healthier foods, increasing choice and tackling inequalities. Potential for families to have more</td>
<td>As set out on page 6, The expenditure for Best Start Foods (and Healthy Start Vouchers) during the 2019-20 transition year is likely to be around £5 million, rising to £6 million in 2020-21. The cost of Healthy Start Vouchers in Scotland for 2017-18 was £4.04 million and in 2018-19 was £3.7 million due to a drop in take-up of Healthy Start Vouchers. This is expected to increase through communications around Best Start Foods. Little impact on revenue to retailers or local businesses, anticipated that benefits will far outweigh any costs. Some small, local retailers may consider investing in a card reader but this would be beneficial in the long run</td>
</tr>
<tr>
<td>disposable income to spend on essential items for their baby or child</td>
<td>as payments via debit/credit card continue to grow. ³</td>
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<tr>
<td>Families' additional spend could potentially increase business activity.</td>
<td>Increase in business activity for retailers not currently registered with the Healthy Start Voucher scheme.</td>
<td></td>
</tr>
<tr>
<td>Time, resource and financial savings for retailers under current scheme. No longer required to collect vouchers and wait to be reimbursed, a task which is time consuming and the vouchers are quite often void.</td>
<td>No registration scheme required for retailers. For the ability to participate in the supply of Best Start Foods a retailer just needs to be in the correct merchant code for Allpay to make payments. The only issue that we were made aware of was for community food groups who may not have access to a card reader machine however we asked for further evidence to support this in order to work on a solution to this and there was no additional information provided. We anticipate therefore that this is low risk.</td>
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10. Declaration and publication

11. The Cabinet Secretary or Minister responsible for the policy (or the Chief Executive of non-departmental public bodies and other agencies if appropriate) is required to sign off all BRIAs prior to publication.

Sign-off for Final BRIAs:

I have read the Business and Regulatory Impact Assessment and I am satisfied that (a) it represents a fair and reasonable view of the expected costs, benefits and impact of the policy, and (b) that the benefits justify the costs. I am satisfied that business impact has been assessed with the support of businesses in Scotland.

Signed:

[Signature]

Date:

30 May 2019

Minister responsible: Joe FitzPatrick, Minister for Public Health, Sport and Wellbeing

Scottish Government Contact point: Sarah Bruce, Team Leader, Welfare Foods team, Improving Health & Wellbeing Unit, Children and Families Directorate