

Poverty Alliance response to Ending the need for foodbanks: consultation on a draft national plan: January 2022

About us

The Poverty Alliance is Scotland's anti-poverty network. Together, we influence policy and practice, provide evidence through research, support communities to challenge poverty and build public support for the solutions to tackle poverty. Our members include grassroots community groups, activists who are experiencing poverty, academics, large national NGOs, voluntary organisations, statutory organisations, trade unions, and faith groups.

Introduction

In a just Scotland, everyone would have enough income from employment and/or social security to live a decent and dignified life. Currently, too many people are having to make impossible choices about whether to prioritise paying for food or other essentials such as travel, rent or bills.

The growth in the numbers of people relying on foodbanks represents a failure to successfully tackle poverty. Harmful and unjust policies such as the two-child limit and the benefit cap, along with the recent £20 cut to Universal Credit are tightening poverty's grip, and coupled with the growing cost of living crisis, the situation low-income households are facing is of serious concern. As a result, we need urgent and bold action from the Scottish Government to prevent more people from being swept into poverty, and to prevent more people from being forced into using food banks.

Our response to this consultation is shaped by the experiences of our member organisations and previous research projects such as the A Menu For Change project and the Get Heard Scotland programme. Both projects feature the experiences of people who have been or currently are facing food insecurity and these experiences will inform our response today.

Responses to consultation questions:

- 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]**

[N]

Along with CPAG, Nourish Scotland and Oxfam Scotland, the Poverty Alliance published the A Menu For Change report in 2019¹ which laid bare the drivers of food insecurity, with insecure incomes from employment and social security being central. We were therefore glad to see the Scottish Government recognise this as the primary cause of food insecurity in this strategy. Many of the policies detailed in this strategy will go some way to supporting

¹ <https://amenuforchange.files.wordpress.com/2020/01/found-wanting-a-menu-for-change-final.pdf>

and securing household incomes, and in so doing will help to tackle food insecurity. However, we do not believe they will not go far enough to eradicate the need overall.

Ending the need for foodbanks is to end poverty. To do this, the Scottish Government must use all powers available to maximise investment in social security and incentivise employers to pay the real Living Wage whilst ensuring flexible, secure working conditions. As the strategy indicates, many of the policies driving food insecurity come from the UK Government, policies such as the 5-week wait for Universal Credit and the benefit cap. However, there are clear and significant interventions the Scottish Government can make with the powers they have that would help to further reduce food insecurity and bring us closer toward the vision of ending the need for food banks.

Prevention

Fair work

Insecure, low paid work is a significant driver of food insecurity, forcing people to rely on other support to afford basic necessities. Although significant parts of employment policy remain reserved to the UK Government, there are still several actions the Scottish Government can take using the powers it currently has.

On the promotion of the real Living Wage, there has been a great deal of success in the real Living Wage movement with 2,448 employers currently accredited as Living Wage employers, with 52,000 workers receiving a pay increase as a result ²However certain sectors are less likely to pay the real Living Wage, such as the care sector and hospitality sector. Workers in these sectors are disproportionately³ affected. What these groups also share in is increased vulnerability to poverty and a higher likelihood to need to turn to foodbanks.

To tackle this, as we called for in our 2021 manifesto 'A Scotland For All Of Us', ⁴ the Scottish Government should use its local taxation powers to drive and incentivise a move towards paying the real Living Wage. For example, introducing a locally-collected low-pay levy in order to fund a Fair Work Bonus for Living Wage-accredited employers. This would incentivise employers to embed Fair Work practices rather than develop business models based on low-paid, insecure work, thereby ensuring more people have secure, decent income from work and reducing the chance of food insecurity.

Further to this, in developing employability schemes, it is critical that the Scottish Government ensures that groups already facing exclusion from the labour market (lone parents – who are overwhelmingly women-, BME people, disabled people and people with mental health issues) are not overlooked. Data from the Trussell Trust shows that two thirds (66%) of households referred to a food bank in early 2020 had one or more members with a

² <https://scottishlivingwage.org/>

³ <https://www.gov.scot/collections/working-poverty/>

⁴ <https://www.povertyalliance.org/wp-content/uploads/2021/03/A-Scotland-for-all-of-us-Poverty-Alliance-2021-Scottish-Parliament-election-manifesto.pdf>

disability.⁵ Employability schemes must therefore be designed in ways that reflect and meet the needs of different groups, so as to prevent further exclusion.

Insecure work is another key trigger of food insecurity, as evidenced in the A Menu for Change report which noted a higher reliance on foodbanks during gaps in income due to short term contracts ending or lack of guaranteed hours due to zero-hours contracts⁶. This links to the transition between employment and social security which often worsens outcomes for households relying on it. For example, research by the Trussell Trust showed that the 5-week wait for initial Universal Credit payments was one of the key drivers leading people to use foodbanks⁷. Power over employment law is reserved to the UK Government, there are initiatives that can be supported, such as the Living Hours initiative that is being delivered by Living Wage Scotland.⁸

Finally, the Scottish Government must also prioritise action to remove barriers to paid work, for example, many single parents are locked out of the labour market due to a lack of flexible and affordable childcare. We welcomed the previous expansion of funded childcare to 1140 hours however this could and should be expanded further to 50 hours of childcare per week, in order to support parents – particularly lone parents, who are overwhelmingly women - both to reduce costs but also to support those who wish to begin working, training and education. Engender have produced a comprehensive set of policy recommendations the Scottish Government should consider to ensure Scotland's economy works for women.⁹

Social Security

Social security is often the primary source of income for people who are unable to work or face additional barriers to finding work. However, income from social security is inadequate to meet living costs and often leaves people unable to afford the essentials leading to foodbank use.¹⁰ In the A Menu For Change programme, participants noted that their level of food insecurity often moved between different levels of severity depending on sudden and/or unexpected changes to income.¹¹ These changes were often related to insecure work conditions (zero-hour contracts, temporary contracts) or unexpected changes to benefits (having disability benefits reassessed to a lower level, the 5-week wait for universal credit).

How these benefits are administered and assessed, and particularly how they function in practice is crucially important after an individual moves into paid employment and before they receive their first benefit payments. The five-week wait for Universal Credit is particularly harmful in these transitional stages, and although Universal Credit is still a policy area reserved to the UK Government, mechanisms can be put in place with the social security powers Scotland possesses to offset this. For example, the Universal Credit

⁵ <https://www.trusselltrust.org/wp-content/uploads/sites/2/2021/05/State-of-Hunger-2021-Report-Final.pdf>

⁶ <https://amenuforchange.files.wordpress.com/2020/01/found-wanting-a-menu-for-change-final.pdf>

⁷ <https://www.trusselltrust.org/wp-content/uploads/sites/2/2017/04/Early-Warnings-Universal-Credit-and-Foodbanks.pdf>

⁸ <https://scottishlivingwage.org/living-hours/>

⁹ [Recovery \(engender.org.uk\)](https://engender.org.uk)

¹⁰ <https://www.trusselltrust.org/news-and-blog/latest-stats/mid-year-stats/>

¹¹ <https://amenuforchange.files.wordpress.com/2020/01/found-wanting-a-menu-for-change-final.pdf>

Contingency Fund has been put in place in Northern Ireland which provides people waiting on their first Universal Credit payment with a one-off payment to tide them over.¹² Such a Fund could and should be explored by the Scottish Government.

We have welcomed a number of recent developments in Scotland's social security system, such as the doubling of the Scottish Child Payment to £20 per week and the continued investment in the Scottish Welfare Fund. However, data from the Scottish Government shows that just over half (53%) of applicants to the Scottish Welfare Fund were single-person households.¹³ Although we welcome policies aimed at ensuring no child is swept into poverty, more work must also be done to support households without children. For example, the single persons discount on council tax acknowledges the heightened costs of living alone, freeing up household income for other costs.

Some examples of measures that the Scottish Government can take now to reduce the need for foodbanks include:

- Ensuring that eligibility for the Scottish Child Payment is expanded to all over 6's as soon as possible and provide bridging payments (equating to the doubled amount) in the meantime.
- Continuing to invest in the discretionary housing payment scheme, ensuring that amounts are in-line with current real rental costs in both the social and private rental sectors.
- Beginning the process to investigate and implement a support fund for people leaving domestic abuse situations.
- Increasing the value of other financial support for low-income families, including the Best Start Grant and School Clothing Grant.
- Increasing the value of financial support for carers, including the Carer's Allowance Supplement and the Young Carers Grant.
- Investing in welfare rights provision to ensure people are aware of and able to access their entitlements.

Cost of living

The continuing cost of living crisis is a significant cause for concern for low-income households and this was highlighted in engagement that we have undertaken with Poverty Alliance member organisations. The looming price hike of energy costs has the potential to push many more people into hardship. Although many of the plans detailed in the strategy have the potential to reduce the reliance on foodbanks, they do not appear to be strong enough to offset the financial shock on low-income households due to the cost of living crisis, which will likely lead to a squeeze on household budgets and a subsequent increasing reliance on foodbanks.

While the Scottish Government does not have powers over some key areas related to the cost-of-living crisis, it does have powers in many areas where a real difference can be made. One such area is transport. In our research *Transport and Child Poverty Beyond the Pandemic* commissioned by Transport Scotland, findings showed that low-income households were often exclusively using public transport and had no access to private

¹² <https://www.nidirect.gov.uk/articles/extra-financial-support#toc-1>

¹³ <https://www.gov.scot/publications/scottish-welfare-fund-statistics-update-to-30-june-2021/>

transport. Alternatives were limited with support networks such as family and friends cited as the main alternative options for low-income families. This reliance on public transport resulted in participants being disproportionately affected by issues such as availability of different transport modes, the cost of transport and timing and frequency. Transport was required for day-to-day engagement with services and support networks including accessing healthcare, education, childcare, caring responsibilities, employment, shopping and engaging in leisure activities. Transport could either alleviate or exacerbate poverty depending on participants' household circumstances.¹⁴

This is why our *Everyone Aboard* campaign calls for an expansion of free bus travel to made free for all those under the age of 26 and those on low-income benefits.¹⁵ Given we know that the majority people using foodbank are in receipt of low-income benefits¹⁶, this is a significant policy move which could help redirect cash from travel costs into food costs whilst also tackling the climate emergency and ensuing a Just Transition. Relatedly, free bus travel allows people to access larger supermarkets that often offer cheaper food compared to smaller convenience stores.

Response

Scottish Welfare Fund and other discretionary support

The Scottish Welfare Fund is a good example of a cash-first approach that allows individuals the help they need when they need it. As such, it is an important intervention that can prevent food bank use by giving people the cash they need so that they do not have to rely on a food bank.

Participants in the A Menu For Change project noted that when their Scottish Welfare Fund applications were successful, they were significantly preferable to going to a food bank or community café as there was the flexibility to not only pay for food but other household essentials. One participant noted that this cash award was preferred as it allowed her son - who has a disability and is fussy about what he eats- to choose what he wanted to eat therefore reducing the stress of the situation where a food parcel may not provide food he wants to eat. In contrast, not all experiences were positive with some participants noting confusion around eligibility criteria and unempathetic administrators of the fund.

Additionally, we know that experiences of the SWF vary between local authorities in terms of amount of support allocated, applications being rejected and the timeliness of responses. We know from hearing from people with experiences of applying to the SWF that it is most effective when grants are made quickly, where applications are easy to engage with and when decision-making results in high-quality decisions. To support these experiences, we need additional investment in the SWF to improve its resourcing and administration whilst enabling better promotion of the fund to people who need crisis support. Quick decisions on SWF applications are crucial to reducing the need for any emergency food aid. For the SWF to be a real alternative to food banks, it needs to reach people the same day or they will need emergency food regardless.

¹⁴ <https://www.povertyalliance.org/wp-content/uploads/2021/06/Transport-and-Child-Poverty-Beyond-the-Pandemic.pdf>

¹⁵ <https://www.povertyalliance.org/campaigns/everyone-aboard-campaign/>

¹⁶ <https://www.trusselltrust.org/wp-content/uploads/sites/2/2021/05/State-of-Hunger-2021-Report-Final.pdf>

We are glad to see the Scottish Government announce a review on the performance and administration of the SWF and hope that the outcomes of this review allow improvements for those turning to it for support.

Money Advice

Access to money advice services and imbedding these in locations such as GPs is a welcome action and should be targeted in areas with high levels of poverty. This should also link into the 'no wrong door' approach to ensure that people in need of financial support can receive the welfare rights advice they require whilst also being linked to local community organisations to provide wrap around support. It is important to note, though, that while money advice services are vital sources of support, we must emphasise that no amount of money advice can mitigate an income crisis, which is the key driver of food bank use.

Cash-first approach & Dignified Food Access

Cash first approaches were identified by our members as working best for empowering people to seek support and access food. Such approaches are rights-focused and enable individuals to meet their own needs as they see fit, while reducing the stigma associated with other forms of support.

This was evidenced in the A Menu For Change report¹⁷ which found that that shame is one of the key barriers facing people experiencing food insecurity; often preventing them from seeking support. Addressing stigma and in particular the stigmatisation of poverty must be central to ensuring dignified food access.

We would be keen to see more direct work by the Scottish Government to tackle the stigmatised nature of poverty perhaps through embedding lessons about poverty into schools, communication campaigns raising awareness of the difficult choices people in poverty have to make and tackling misrepresentation of people facing poverty by some media outlets – fighting the negative narratives pushed such as 'benefit scroungers'. The Cost of the School Day (CoSD) initiative, developed by the Child Poverty Action Group in Scotland is an important example of a practical approach to addressing the practices in schools that can led to children from low incomes families feeling stigmatised. It is important that the lessons from the programme are learned and applied to approaches to ending the need for foodbanks in Scotland.

As previously stated, the most direct way that the Scottish Government can reduce the shame felt by people facing food insecurity is to take a cash first approach and ensure that all people in Scotland have enough income to afford to buy the food they need.

What more we plan to do

Explore Minimum Income Guarantee and Universal Basic Services

We support the exploration of implementing a Minimum Income Guarantee and Universal Basic Services. It is important to be clear, though, that both a Minimum Income Guarantee

¹⁷ <https://amenuforchange.files.wordpress.com/2020/01/found-wanting-a-menu-for-change-final.pdf>

(MIG) and a Universal Basic Services (UBS) approach are long-term goals. Key to the delivery of both MIG and UBS should be practical steps to increase incomes towards a recognised minimum income standard. This means building on the increase to SCP and applying an adequacy measure to Scottish social security entitlements.

Pilot the use of shopping vouchers in place of foodbank referrals

Our members raised some concerns regarding the use of food vouchers in place of foodbank referrals and again reiterated their preference for cash first approaches or pre-paid cards. For example, vouchers can be withheld in circumstances of domestic abuse. On a practical note, vouchers can place limits on the range of food shops available to the person in receipt of them depending on which shops choose to take part or have an awareness of the voucher scheme. This also places further strain on households who may have dietary needs due to health or religious practices as participating stores may not cater for their needs.

However, there may be some occasions where this may be preferred, for example our members raised the example of cases of financial domestic abuse where money may be withheld. On this however we would suggest consulting with organisations such as Engender who are better placed to advise. Overall, piloting the use of vouchers is inconsistent with the vision for a cash-first response to food insecurity and we would instead strongly favour cash-first approaches.

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

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]

Although we answered Yes to both questions 2 and 3, there are a number of areas we believe require further exploration and policy intervention in order to end the need for foodbanks as a primary response to food insecurity.

Rural Poverty/Geography

One aspect that the strategy does not consider in any great detail is the issue of geography, and in particular rurality. Poverty Alliance members emphasise that people facing food

insecurity who live in rural areas face combined issues surrounding not just affording food, but also the lack of available shops and unaffordable or inaccessible public transport to reach what few shops are available.

As stated previously in this submission, a further expansion of free bus travel would help to mitigate at least some of challenge for people living in rural areas. More broadly, we would welcome further consideration of how the interventions detailed within the strategy will be delivered in rural areas, and whether such areas require different types or scales of intervention.

People with No Recourse to Public Funds Status

A further concern we have is the lack of meaningful action for people with NRPF status. Having consulted with the Scottish Refugee Council, we believe that there is a significant opportunity for the Scottish Government to intervene with the powers it currently possesses to reduce the high levels of food insecurity faced by people in the asylum system.

As noted previously, the primary cause of food insecurity is inadequate income and asylum seekers who are in receipt of asylum support, receive only £5.66 per day making food insecurity an ever-present feature of their day to day life. These rates mean that poverty is built into the asylum system, because people do not have the opportunity to access income through employment or social security.

Most social security support delivered by the Scottish Government is not available to asylum seekers. For example, families in the asylum system are unable to access the Scottish Child Payment. In other devolved nations, people with NRPF status can access other support mechanism For example, the Welsh Discretionary Assistance Fund is payable to people with NRPF status but the Scottish Welfare Fund is not. This is one example where expanding eligibility can make significant changes for people with NRPF status living in Scotland. The Scottish Government should explore all possible legal and legislative options for widening access to the Scottish Child Payment, and to other forms of social security support, to people in the asylum system.

Relatedly, the Scottish Refugee Council noted that people in the asylum system have significant numbers of appointments due to the legal processes that they are going through and they often talk about having to choose between the cost of travel to appointments and adequate food for that day. This is another situation where the calls from our Everyone Aboard campaign would ease the financial pressure on this group. Our call for the extension of free bus travel for under 25's will help this group significantly as they will no longer have to make these choices, this call has also been echoed by the Voices Network who are campaigning for free travel to be extended to all asylum applicants.

Students

Student loans and grants through Scottish Awards Agency Scotland (SAAS) are a significant investment, allowing people from all income backgrounds to access further and higher education. However, research by the National Union of Students Scotland shows that after average housing costs for student accommodation, many students are left with only £22 a week to afford food and other necessities.¹⁸ Students are unable to apply for the majority of social security benefits and are more often in insecure, low-paid work. For students who may be older, estranged or have additional responsibilities such as childcare or care, they may not have the option of accessing additional income from parents or work. Additionally, SAAS payments stop over the summer period leaving many students with no income and an inability to apply for social security. Particularly in relation to hiking student housing costs¹⁹ and the cost of living crisis, the efficiency of the amount of student loan payments is a further area for consideration in relation to food insecurity.

Housing

A Menu For Change also highlighted the need to look at food insecurity in relation to other sectors such as housing. In both the social and private rented sectors, rents have increased often above the rate of inflation.^{20 21} The report highlighted that limitations on social security allowances such as housing benefit means that it is becoming less likely that benefit payments cover the full rent amount adding further pressure on household budgets.²² This causes huge strains for low-income households when rents are often too high for people on the lowest incomes even in the social sector. We welcome the Scottish Government's commitment to build more affordable housing, including significant investment in social housing but we need to emphasise that 'affordable' housing has different meanings to different people. We welcome discussions about how best to ensure housing is affordable for all including the exploration of the delivery of rent controls.

Practically, when building new homes, the Scottish Government must ensure new homes are placed in areas where affordable food shops are accessible, expanding on learning from the 20-minute neighbourhood initiative.²³

Efficient funding of the third sector

In both the A Menu for Change programme and the Get Heard Scotland report, the role of community organisations was highlighted as a significant support mechanism for people facing insecure incomes. These organisations continually provide support to people facing food insecurity through methods such as food parcels, emotional support and even more informal support such as helping with school uniforms by giving used clothing.²⁴ This support

¹⁸ <https://www.nus-scotland.org.uk/articles/student-rent-rises-34>

¹⁹ See 18

²⁰ <https://www.gov.scot/publications/private-sector-rent-statistics-scotland-2010-2021/pages/9/>

²¹ <https://www.gov.scot/publications/social-tenants-scotland-2017/pages/7/>

²² <https://amenuforchange.files.wordpress.com/2020/01/found-wanting-a-menu-for-change-final.pdf>

²³ <https://www.gov.scot/publications/scotlands-fourth-national-planning-framework-position-statement/pages/5/>

²⁴ https://www.povertyalliance.org/wp-content/uploads/2021/11/TPA_GHS_Project_Research_Report_FINAL_proof_02-1.pdf

however is chronically threatened due to insecure funding cycles. As we called for in A Scotland For All Of Us manifesto²⁵ longer-term consistent funding models should be explored for these organisations in recognition of the vital support they provide to some of the most vulnerable to food insecurity. Third sector organisations who took part in the Get Heard project stated that funding processes should be redesigned to be less competitive and to encourage much more collaboration between organisations, rather than pitting organisations against one another.²⁶

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]

As indicated, the key cause of food insecurity is poverty therefore we would consider that reductions of the numbers of people in poverty to be a key indicator of reduction in the use of foodbanks.

Additionally, ensuring a joined-up network between different foodbanks/food parcel providers, local authorities and community organisations to note areas where use is reducing will also help identify where local strategies are succeeding and hopefully allow for learning from good practise examples and lesson learning from areas where reduction is not working. This will also allow for targeted approaches in areas where food bank reliance may remain higher than anticipated despite proposed interventions and to identify why this is happening.

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

We believe that more should be done by the Scottish Government concerning the role of stigma in exacerbating food insecurity. Participants in the A Menu For Change programme explained that feelings of shame and self-consciousness were often barriers to asking for support whether this be to foodbanks or in applying to the Scottish Welfare Fund.²⁷

For more information, please contact:

Ashley Mclean, Policy and Parliamentary Officer, Poverty Alliance

ashley.mclean@povertyalliance.org

²⁵ <https://www.povertyalliance.org/wp-content/uploads/2021/03/A-Scotland-for-all-of-us-Poverty-Alliance-2021-Scottish-Parliament-election-manifesto.pdf>

²⁶ <https://www.povertyalliance.org/wp-content/uploads/2021/02/Get-Heard-Scotland-Renfrewshire-February-2021.pdf>

²⁷ <https://amenuforchange.files.wordpress.com/2020/01/found-wanting-a-menu-for-change-final.pdf>