

Scottish Government Consultation

Ending the Need for Food Banks national plan

Nourish Scotland response

January 2022

- 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.

We welcome the Scottish Government's alignment of its commitment to ending the need for food banks with its wider commitments to human rights, the Sustainable Development Goals and the eradication of poverty in Scotland. The two-pronged approach through prevention and response are consistent with this commitment.

For the approach to be successful, there will need to be further investment in efforts to: mitigate the effects that the benefit system has on financially insecure households; reduce the cost of living for groups at higher risk of food insecurity; and strengthen and promote existing financial assistance and advice provision in Scotland.

In general, we believe that the national plan should focus on ending the need for 'charitable food aid' (rather than 'food banks') by improving the affordability of a healthy and sustainable diet. This will help clarify that the intention is to realise human rights, eradicate poverty and ensure that everyone can afford the food that meets their needs and preferences without the need for charity of any kind.

Within the prevention strand, we welcome the focus on fair work, social security and reduced cost of living to enable everyone to afford the food that meets their needs and preferences.

People in the asylum process or with no recourse to public funds require specific, targeted measures to reduce the cost of living where income from work and social security are restricted or unavailable, and this should be reflected in the national plan.

Within the response strand, we agree that joined up local responses promoting emergency financial assistance and money advice alongside holistic support services should be the primary response to a financial emergency or crisis.

It should not be the case that charitable food aid is ever required. It is the government's responsibility to prevent and respond to financial emergencies and crises and to ensure that people can afford a healthy and sustainable diet.

- 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]

We recommend including a target to end severe food insecurity by 2030 in the upcoming Good Food Nation Act. This is in line with the Scottish Government's commitments to end hunger as part of the Sustainable Development Goals (SDG2). The Good Food Nation bill provides a timely and important opportunity to put this commitment into law ahead of the Human Rights Act.

Giving effect to the International Covenant on Economic Social and Cultural Rights in Scots Law through the Human Rights Bill is an important step in realising the right to adequate food in Scotland. The Scottish Government and local authorities could be preparing for this by establishing meaningful methods for involving people with experience of food insecurity in decision-making at all levels and developing rights-based training for staff in every part of the public sector who play a role in preventing and responding to food insecurity.

More local information is needed to effectively monitor the needs of different groups and the impact of different strategies. This requires greater understanding of whether measures to boost incomes, reduce the cost of living or improve responses to financial crisis are most effective for groups of people with particular characteristics or experiences. Local authorities should be responsible for measuring food insecurity at a local level to enable local monitoring of particular strategies and interventions on specific groups or areas. This should also be linked to actions undertaken as part of the proposed Cash First Partnerships.

For the prevention strand to be successful, the Scottish Government and local authorities will need to work together to trial, implement and review targeted strategies to support all groups of people at higher risk of food insecurity.

For example, the draft national plan recognises that people with no recourse to public funds are excluded from many mainstream supports, and references 'funding to the British Red Cross to provide vital crisis cash support'. However, the British Red Cross Scottish Crisis Fund has only limited funding and reach across Scotland, while we know that many people continue to be supported by community food providers who recognise the persistent financial pressure that people are facing. The Scottish Crisis Fund is designed as an innovative and important cash-first response for people facing acute hardship and destitution, but more work is needed to prevent destitution from arising in the first place. Greater upstream collaboration between the Scottish Government and local authorities could reduce the costs of living of people with no recourse to public funds and prevent hardship from occurring.

Unmanageable transport cost (including to access food retail of their choice) is often listed as one of the top challenges for people living on low incomes. Free transport for people on low incomes or in the asylum process may make a significant difference to a household's ability to afford food with choice and dignity. Involving people with direct experience in the design and delivery of these interventions will be essential and cost-saving in the long-run.

Actions to prevent food insecurity could also include ring-fencing / protecting cost of living expenses for anyone who has had support withdrawn or is repaying a debt to national or local government. The Scottish Government could explore mitigation payments for people waiting for Universal Credit payments (similar to the Universal Credit Contingency Fund in Northern Ireland) and support to ensure that repayment of a benefit advance to the UK Government does not leave someone unable to afford the food that meets their needs and preferences. At local level, local authorities should review and amend policies around debt recovery and repayment of arrears where these leave someone financially insecure.

For the [response](#) strand to be successful, emergency financial assistance will need to be much more widely promoted, understood and accessible to all frontline services and people facing acute financial crises. Money advice and holistic support services will also need to be widely promoted, resourced and readily accessible to people in every community, with waiting times significantly reduced and confidence restored.

The proposed Cash First Partnerships will be well-placed to explore and understand the specific, localised gaps in delivery and what is needed to reduce the barriers to existing provision. We welcome this approach and believe that with sufficient funding, this network of partnerships has the potential to draw out considerable learning about the barriers that prevent people from accessing existing support and how good practice models can be replicated and / or scaled up to reach more people and make services more accessible and effective. Local food insecurity measurement will help to evaluate the effect of these partnerships' activities.

The effective, timely and dignified delivery of emergency financial assistance is critical to making 'food banks the last port of call' in Scotland. However, existing provision will not be sufficient on its own to address the significant need arising in our current economic and social crises.

We therefore welcome the Scottish Government's commitment to review the 'purpose and operation' of the Scottish Welfare Fund. In 2019, the A Menu for Change project published a set of [recommendations](#) for both the Scottish Government and local authorities about how to improve the delivery of the Scottish Welfare Fund and reduce the need for emergency food aid. Further lessons can also be drawn from local authorities' delivery of emergency financial assistance during the pandemic. People with experience of financial hardship should be involved in this review to ensure that addressing barriers such as shame in seeking financial assistance are fully reflected in the recommendations.

The Scottish Government and local authorities must be willing and ready to update guidance, reform delivery and commit resources to the Scottish Welfare Fund to ensure that it is capable of providing financial assistance where needed. This is likely to include investment in the administration and promotion of the Scottish Welfare Fund to ensure that people at risk of or experiencing food insecurity are aware of its existence and that local authorities are in a position to respond to applications quickly and with dignity. Promotion materials and application methods should be made available in multiple languages and formats to ensure inclusivity.

As an interim measure, we welcome the intention to work with partners in the advice sector through the pilot on shopping cards in place of food bank referrals to explore what is needed to support people who are waiting for a decision.

Alongside improvements to emergency financial assistance schemes, significant investment is needed to make money advice and holistic support services (including mental health services) available in every part of Scotland. Services should be easily accessible to people in financial crisis and *before* a crisis occurs. Lessons from the No Wrong Door approach can usefully inform these strategies. Without well-resourced and easily accessed support services in place, communities will continue to bear the brunt of the current social and economic crises.

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]

We welcome the intention to explore the integration of food insecurity measurement into the evaluation of measures such as the Scottish Child Payment and Minimum Income Guarantee. We see this as essential to understanding the effectiveness of any income-boosting measures implemented by the Scottish Government and recommend that it is integrated urgently.

We suggest that a similar approach should be used with measures to reduce the cost of living, particularly where these measures are targeted at / reaching groups at higher risk of food insecurity (as discussed in paragraphs 15-18 of the draft national plan).

We welcome the commitment to continue measuring food insecurity at a national level through the Scottish Health Survey and the Family Resources Survey. This information is critically important to understand the wider trends in food insecurity beyond what food aid provision figures reveal and should be linked to evaluating the impact of national measures such as the Scottish Child Payment. There should be a target to end severe food insecurity in Scotland by 2030 included in the upcoming Good Food Nation Act.

We note the intention to partner with national food banks and community food networks to monitor charitable food aid provision and suggest that resources would be better allocated to measuring food insecurity at a local level. Data on food aid provision is not an effective measure of the full picture of food insecurity, whereas longer-term monitoring of food insecurity at local levels would build our understanding of who is most at risk and the impact of local activities. Local authorities could be responsible for monitoring food insecurity as part of their poverty and child poverty action plans, as well as through the Cash First Partnerships proposed in the national plan.

Confidence about moving in the right direction –

The success of the plan cannot be measured by a reduction in food banks or charitable food aid alone, as this might mean that people are struggling without support. Success of the national plan will be when everyone in Scotland is able to afford a healthy and sustainable diet.

For this national plan to succeed, people must be aware of and feel confident to take advantage of income-boosting support and measures to reduce the cost of living. People in every community must also be aware of and be able to access emergency financial support and money advice services quickly, efficiently and with dignity.

Measures of progress in the aim to end the need for food banks will include:

1. Increased confidence in the general public that:
 - a. Incomes through work and social security are sufficient for people to afford the food that meets their needs and preferences.

- b. Emergency financial assistance, money advice services and holistic support services are readily available and easily accessible to respond effectively when emergencies/crises arise.
 2. Increased awareness and understanding of income-boosting and financial assistance measures to support people to afford the food that meets their needs and preferences, and how to access them.
 3. Increased awareness and understanding of money advice and holistic support services to help people experiencing longer-term financial insecurity, and how to access them.
 4. Increased uptake and engagement with 'cash-first' measures, including Scottish Welfare Fund crisis grants, other emergency financial assistance and money advice services.
 5. Improved experience of emergency financial assistance and money advice services, including:
 - a. Reduced waiting times
 - b. Improved 'word of mouth' recommendations to others in the community / positive feedback on the experience
- 6. Is there anything else that you think should be considered in the development of this plan? [Open comment]**

For Scotland to deliver on its commitments to human rights and the eradication of poverty, everyone in Scotland should have confidence that incomes through fair work and social security are enough to meet the cost of living, and that when an emergency arises, there is financial assistance available to support them. Actions to deliver on these commitments should place dignity at the heart of service design and delivery.

For Scotland to end the need for food banks, staff and volunteers of food banks and other forms of charitable food aid need to have confidence that people in their community are able to consistently afford the food that meets their needs and preferences. Until this happens, communities will go to great lengths to open and sustain charitable food aid projects to support people who are worrying about affording the food that they need.

We support the overall approach in this draft national plan and welcome the Scottish Government's leadership in setting out an ambitious vision for a future without the need for food banks. The actions proposed in the draft plan need to be strengthened and better integrated into wider activity across national and local government to ensure we meet our shared aims.

At the moment, there is a strong emphasis in the draft national plan on tackling child poverty through measures to support children and families. More localised and directed measures will be needed to support other groups who face persistent or intermittent financial pressures that lead to food insecurity, such as people with disabilities, minority ethnic households and people who are refugees or asylum seekers.

Greater clarity is needed on the timescale for delivery, scale of investment and monitoring and review processes for the national plan. For example, some of the 'actions underway' may be coming to an end soon, while some of the proposed actions have already begun. Though the exploration of a Minimum Income Guarantee and Universal Basic Services is welcome, the outcome of this will be too long-term to affect the need for charitable food aid in the coming years.

Greater clarity is needed within the response strand to distinguish 'help to access food' (which may include measures to help someone overcome geographic or physical barriers to sourcing and preparing food, such as Food Train or Meals on Wheels) from charitable food aid (which includes all forms of food-based support to help someone facing acute or prolonged financial hardship).