

The Trussell Trust: Response to the Scottish Government's consultation on a draft national plan to end the need for food banks

1. Do you think 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?

The Trussell Trust is an anti-poverty charity supporting a UK-wide network of more than 1,200 food bank centres and together, we provide emergency food and support to people locked in poverty, and campaign for change to end the need for food banks across the UK.

There are currently 426 food banks across the UK operating more than 1,200 food bank centres and delivered by 28,000 food bank volunteers. There are 43 food banks in Scotland, distributing parcels at over 130 centres, and in 26 local authorities. The Trussell Trust welcomes the Scottish Government's draft national plan to end the need for food banks as a primary response to food insecurity. In the run up to the Holyrood elections in May 2021, we called on all parties and their candidates to pledge that food banks cannot become a permanent part of the fabric of our communities, and we called on the incoming Scottish Government to commit to end the need for food banks in Scotland and develop an action plan within 12 months to make this happen.

We are pleased that the Scottish Government listened to our call and is working to deliver this commitment. However, we believe the national action plan needs to be much more ambitious than simply ending the need for food banks. Ending the need for food banks as a primary response to food insecurity should not result in the growth of other forms of charitable food aid. To genuinely achieve the goal of ending the need for food banks in a way that promotes justice, compassion, and dignity, we must end the need for *all* charitable food aid in Scotland.

As we recover from the Covid-19 crisis and use our devolved powers over social security at Holyrood, we have an important opportunity to shape a social security system for Scotland that provides a strong safety net to protect people most in need and to focus on building a better, hunger free future together where everyone can afford the essentials.

We were pleased to see early progress on this commitment after the May '21 elections and hope this consultation will help shape a national plan that will put Scotland firmly on the path to a hunger free future for all. The Scottish Government's vision of a Scotland where "everyone has a sufficient and secure income to access food" is very much aligned with the Trussell Trust's own vision of a just, compassionate future, where no one should have to access charitable food provision to get by.

It is simply not right that so many people in Scotland are facing impossible choices, unable to afford the essentials that we all need to eat, stay warm and dry, and keep clean. Scotland is one of the richest nations in the world, yet one in four children are caught up in a cycle of poverty from which it is difficult to escape. We have the power to change this, but only if ending poverty is at the heart of all Scottish Government policy. No one should be going hungry in Scotland. There is no challenge more urgent for Scotland than ending poverty and in particular, destitution, shaping a future where everyone can afford the essentials.

We welcome the commitment of the Scottish Government to act, but people living in poverty now cannot afford to wait; commitments need to be matched with bold action. We need transformative policy change, in the short, medium, and long term, if we are to achieve the vision of a Scotland where no one needs to access charitable food aid.

We will only end the need for food banks in Scotland if we increase people's incomes; food insecurity is not about a lack of food, it is about lacking income to buy food. Food bank need is a symptom of poverty, particularly of destitution. Our latest State of Hunger research, published in May 2021, found that low income was the main reason people in Scotland need to use a food bank. 95% of people needing to use a Trussell Trust food bank are destitute, with an average monthly household income after housing costs of just £248 a month, or just £8 a day for a couple without children. This needs to cover energy bills, council tax, food, and other essentials.¹

Compared to five years ago, there has been a significant increase in people needing charitable food aid, with the number of food parcels given out by food banks in our Scottish network alone, up by 63%, from 136,000 in 2015/16 to 221,500 in 2020/21. Of the 221,500 parcels distributed in 2020/21, over a third (77,000 or 35%) were issued to children. 94% of people referred to a food bank in our Scottish network in late 2018 or early 2020 (the two points at which data for our State of Hunger reports was collected) were experiencing destitution, meaning they are unable to afford the essentials like heating and food.

The Covid-19 pandemic has changed the profile of people being supported by food banks, with people using food banks in our network now more likely to have no recourse to public funds (11% compared to 2% pre-2020), be a couple with children (24% compared to 19% pre-2020) and to report mental health problems (72% compared to 54% in early 2020). However, single adults have always been a significant group turning to food banks for help. In late 2019 and early 2020, 56% of households referred to food banks in the Trussell Trust network in Scotland were single adults, mainly single men².

We are yet to see the full impact of the UK Government's £20 a week cut to Universal Credit and there is no doubt the looming hike in household energy bills and current cost of living crisis, with inflation predicted to reach 6% by April 2022, will put further pressure on people already struggling to afford the essentials. We therefore need to see concerted action by the Scottish Government to boost household incomes. In this respect,

¹ <https://www.trusselltrust.org/wp-content/uploads/sites/2/2021/05/State-of-Hunger-2021-Report-Final.pdf>

² <https://trusselldev.wpengine.com/wp-content/uploads/sites/2/2022/01/State-of-Hunger-food-bank-use-poverty-and-destitution-in-Scotland.pdf>

the new Scottish Child Payment is welcome, but we know there is much to be done to increase the take-up of this new benefit, given it is currently estimated to be as low as 60%³. It also needs to be rolled out as quickly as possible to support children and young people aged 6-15 and ensure continued support for families who will currently stop receiving the payment on their child's sixth birthday.

However, given that more than half of households (56%) referred to food banks in our Scottish network are single adults, actions to better support this group need to be prioritised alongside further support for families with children. This includes the expansion of money and welfare advice services, and improved support during the five-week wait for Universal Credit. For single people who are looking for work, the social security system in Scotland does not even provide enough income to avoid destitution.

We welcome the Scottish Government's recognition that a cash-first response must be central to tackling food insecurity⁴. If we are to end the need for charitable food aid, we need to focus on these principles developed through the A Menu for Change project:

1. Increase the income people have to buy food and essentials
2. Improve access to cash and advice in a crisis
3. Deliver holistic public services, which treat people with dignity, kindness, and respect
4. Focus on prevention to avoid an immediate crisis becoming long-term hardship

In this respect, the Scottish Welfare Fund (SWF) has a key role to play in providing adequate cash grants to people in crisis and preventing the need for a food bank referral. We already have evidence about what needs to change to make the SWF work better for everyone and urge the Scottish Government, local authorities and Health and Social Care Partnerships to adopt the A Menu for Change report's best practice recommendations.⁵

We also welcome the Scottish Government's recognition that tackling food insecurity is integral to wider action on poverty and that early intervention and prevention must be at the heart of this approach, including action to increase incomes from fair work and from social security, as well as reducing the cost of living. While we are supportive of a Minimum Income Guarantee for everyone in Scotland, this is a long-term aspiration; the immediate priority must be to focus on scaling up existing services and support that can be delivered with Holyrood's existing powers. Making small changes will not end the need for charitable food provision; we need bold and radical action to deliver meaningful change for people living in poverty and destitution.

We do not support reducing or replacing food bank referrals with the distribution of shopping vouchers. This could lead to stigma for people needing to access support; it fails to respect people's ability to make the best choices for themselves about how to meet their needs and introduces additional barriers for how people address their needs. For

³ <https://digitalpublications.parliament.scot/ResearchBriefings/Report/2021/7/13/c9019cbc-3242-4f2c-9d37-fa7cb34f1376>

⁴ <https://www.gov.scot/binaries/content/documents/govscot/publications/progress-report/2021/02/scottish-government-response-un-food-insecurity-poverty/documents/food-insecurity-poverty/food-insecurity-poverty/govscot%3Adocument/food-insecurity-poverty.pdf>

⁵ [a-menu-for-change-swf-report-updated.pdf](https://www.a-menu-for-change-swf-report-updated.pdf) (wordpress.com)

example, vouchers are less flexible than cash because they cannot be used in many shops. Cash support, such as a SWF crisis grant, can also cover the cost of energy and equipment to cook food, and the home to eat it in. Vouchers are not able to meet these parallel needs at all. Overall, distributing vouchers fails to address the root cause of the issue, which is people not having enough money.

Vouchers will not end food insecurity - the only way to end food insecurity is to increase people's income. We urge the Scottish Government to focus on a cash-first approach - to which it rightly commits in this draft plan - and increase the income people have to spend on essentials. For example, supporting local authorities to strengthen access to the Scottish Welfare Fund, because this can provide cash quickly in a crisis, is a cash-first alternative to distributing vouchers.

We can only end the need for charitable food provision in Scotland if we ensure everyone has enough money to afford the essentials for themselves and their families, with access to a social security system that steps in, when necessary, with emergency cash support, ensuring all people in financial crisis are enabled to access all the financial and other support to which they are entitled.

Ultimately, this plan should be about ending poverty and destitution in Scotland, not reducing the number of food banks. We want to see a Scotland where no one needs to access charitable food aid where everyone has enough money to afford the essentials.

To achieve this, we have five key policy asks of the national plan:

- **Focus on income**, especially how the Scottish Welfare Fund can support more people in immediate financial crisis and use existing powers to mitigate the detrimental effects of UK Government welfare policies such as the five-week wait for Universal Credit and the benefit cap.
- **Improve access to advice and support, with a 'no wrong door' approach**, by extending the Money Talk Team's work, and protecting the crucial role of local authorities in delivering money and debt advice by bringing in a statutory duty that would guarantee the provision of these services in every local authority area.
- **Lead development of referral pathways**, by building on the cash-first partnerships pilot to secure an advice-first principle, instead of a food-first response, among frontline services. Every local authority should have a strategy to ensure no-one is referred for charitable food without also being offered advice, including how to find out about any income they are entitled to. Every service referring people to a charitable food aid provider should adopt and implement a written onward referral policy that ensures advice and support are also provided.
- **Create a new Dignity Charter, led by people with direct experience** of poverty, to establish a standard of service that improves the experience for people in Scotland needing to access support from social security, whether at UK, national or local level.
- **Measure progress and report** on these actions against agreed key milestones, including the launch of the national plan in June 2022 and an annual review of progress.

2. Do you think that the actions underway will reduce the need for food banks as a primary response to food insecurity?

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?

Yes

4. Is there anything else that you think should be done with the powers we have at a national and local level to reduce the need for food banks as a primary response to food insecurity?

While we have answered “yes” to questions 2 and 3 and agree these actions will help reduce the need for food banks, unless they are significantly scaled up and fully resourced, they will not end the need for charitable food provision in Scotland. If the national plan is to deliver on its goals, it also needs to include further details on how each of the actions already underway and additional actions proposed for the future, will deliver on this objective; to achieve this, the plan needs to have a much greater focus on the drivers of food bank use and on ending destitution.

To end the need for charitable food provision in Scotland, the Scottish Government needs to develop a national action plan that:

- a) Ensures everyone can afford the essentials
- b) Helps local services work together to ensure people get the right support at the right time
- c) Involves people with direct experience of poverty, as well as local food banks and other support services

Our response below outlines the actions we suggest the Scottish Government takes in each of these areas, but as outlined in our response to Q1, our five key policy priorities are:

- **Focus on income**, especially how the Scottish Welfare Fund can support people in immediate financial crisis and use existing powers to mitigate the detrimental effects of welfare policies such as the five-week wait for Universal Credit and the benefit cap.
- **Improve access to advice and support, with a ‘no wrong door’ approach**, by extending the Money Talk Team’s work, and protecting the crucial role of local authorities in delivering money and debt advice by bringing in a statutory duty that would guarantee the provision of these services in every local authority area.

- **Lead development of referral pathways**, by building on the cash-first partnerships pilot to secure an advice-first principle, instead of a food-first response, among frontline services. Every local authority should have a strategy to ensure no-one is referred for to a food bank without also being offered advice, including how to find out about any income they are entitled to. Every service referring people to a charitable food provider should adopt and implement a written onward referral policy that ensures advice and support are also provided.
- **Create a new Dignity Charter, led by people with direct experience** of poverty, to establish a standard of service that improves the experience for people in Scotland needing to access support from social security, whether at UK, national or local level.
- **Measure progress and report** on these actions against agreed key milestones, including the launch of the national plan in June 2022 and an annual review of progress.

a) ENSURE EVERYONE CAN AFFORD THE ESSENTIALS

It is not right that anyone is unable to afford to heat their home or put food on the table. People are forced to charities for food when there isn't enough money for the essentials. The vast majority (95%) of people that need support from a food bank in the Trussell Trust's UK-wide network are destitute, meaning that they cannot afford essentials that we all need to eat, stay warm and dry, and keep clean. Provision of food only helps someone to meet one of these immediate needs, not all of them. It will not address the underlying issue that the person in hardship still does not have sufficient income to afford the essentials.

Effective solutions to poverty should be focused on money, not food.

We believe the Scottish Government should take the following steps to ensure everyone in Scotland can afford the basics:

1. Use social security powers to increase incomes
2. Increase funding for the Scottish Welfare Fund
3. Take more action to make work pay and accessible to all
4. Improve support for disabled people
5. More action to end homelessness
6. Make transport more affordable and accessible
7. Extend free school meals to all
8. Take speedier action to tackle child poverty
9. Prioritise a fairer approach to statutory debt
10. Introduce a Minimum Income Guarantee
11. Incorporate the Right to Food into Scots law
12. Better support for people with no recourse to public funds

1. *Use social security powers to increase incomes*

The most immediate driver of the need for food banks is the design and delivery of the social security system and therefore using social security powers to increase incomes, is the key action the Scottish Government can take to end the need for food banks and other charitable food aid.

Our recent State of Hunger research⁶ found that the five-week wait for Universal Credit is a key factor in driving hardship and food bank use, with almost one in five people (19%) using a food bank while waiting for their first Universal Credit payment. We are seeing even more people forced to repay unaffordable advance payments taken out to cover the five week wait. This means that people are starting their claim in debt with long-term consequences to their financial and emotional wellbeing, which will have a negative impact on their lives and on wider society.

Four out of five people using food banks in the Trussell Trust network tell us that social security is their main income, yet the social security system provides only a third of the income necessary for a minimum socially acceptable standard of living, as measured by the Joseph Rowntree Foundation's (JRF) 'Minimum Income Standard'⁷. The JRF measure states that a single person needs to earn £20,400 a year to reach a minimum accepted standard of living in 2021, while a couple with two children would need to have an income of £34,200 between them.

The Scottish Government has already demonstrated how financial support can be targeted to raise incomes with the introduction of the Scottish Child Payment. This provides an excellent model for how existing social security powers could be used to provide targeted payments for people during the difficult wait for Universal Credit. Given the clear link between the five-week wait at the start of a Universal Credit claim and food bank use, this action would have a significant impact on reducing the need for charitable food aid in Scotland. We would also urge the Scottish Government to use its powers to mitigate the UK Government's benefit cap, which disproportionately impacts on poorer households with three or more children (which make up 85% of households affected)⁸, undermining the successful delivery of Scotland's 2030 child poverty targets and forcing families into rent arrears, debt, and food insecurity.

It would also be helpful to better promote the Scottish Choices scheme and increase the flexibility it offers by, for example, offering the option of more frequent payments to people at every meeting with their work coach.

Scotland's social security system should be geared to ensuring everyone can afford the essentials and easily access income support in a way that is simple and person-centered. These steps would not only significantly decrease food bank use and levels of destitution, but also can be achieved within the existing devolution settlement.

⁶ <https://www.trusselltrust.org/wp-content/uploads/sites/2/2021/05/State-of-Hunger-2021-Report-Final.pdf>

⁷ <https://www.jrf.org.uk/report/minimum-income-standard-uk-2021>

⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/822218/benefit-cap-statistics-may-2019-tables.ods

2. Increase funding for the Scottish Welfare Fund

Solutions focused on raising incomes and reducing costs are always preferable to solutions involving the provision of food, as they allow people to make their own choices. Cash-based approaches to support are preferred by those with low-incomes because of their flexibility, dignity, safety, and convenience.

The Scottish Welfare Fund (SWF) plays a crucial role in providing cash grants to people in crisis who cannot afford the essentials, yet it is not always easy to access, and we know support can vary, as documented in the A Menu for Change report⁹. We already have clear evidence of what needs to change and where best practice can be shared; it is frustrating we have seen little action to fix the issues already identified. The SWF is most effective when grants are made quickly, when it is easy to make applications and when decision-making results in high-quality, consistent decisions.

It is disappointing that funding for the SWF has been frozen in the 2022 Scottish Budget, given that poverty in Scotland has been increasing since around 2010-2013, with destitution levels up to the same level as 20 years ago¹⁰. Recent application figures show that repeat Crisis Grant applications are at their highest point since the fund began, with three out of four applications now coming from people who have applied previously¹¹. The most recent statistics also show that a third of applications were rejected.

We need further investment in the SWF to improve its resourcing and administration and to enable much better promotion of the fund, both to people who need crisis support and agencies who could refer people to the fund. Its effectiveness depends on having staff available to assess applications quickly and sensitively. In particular, fast decisions are crucial to reducing the need for charitable food aid. For the SWF crisis grant to be a meaningful alternative to a food parcel, it needs to reach people the same day the application is submitted, or they will also need charitable food aid.

We recommend SWF guidelines are amended to suggest crisis grants should be made on the same day. Local authorities will need appropriate administration resources to make this possible. We would also like to see action to lift No Recourse to Public Funds restrictions, where possible and in such a way that it does not impact on a person's immigration status. For example, the Welsh Discretionary Assistance Fund is payable to people with no recourse to public funds, yet the Scottish Welfare Fund isn't. This needs to change.

3. Take more action to make work pay and accessible to all

The challenges of insecure work and low incomes must be addressed as part of any action plan to end the need for food banks. While we recognise that employment law is largely reserved to Westminster, the Scottish Government does have significant powers to influence and deliver fair work, including promoting a fair living wage and decent living hours for all. Public procurement powers should be fully utilised to

⁹ [a-menu-for-change-swf-report-updated.pdf](#)

¹⁰ [Poverty in Scotland 2021 | JRF](#)

¹¹ <https://www.gov.scot/publications/scottish-welfare-fund-statistics-update-to-30-june-2021/>

encourage better pay, terms and conditions in the workplace, improve job security and quality for low paid workers and flexibility for parents and carers. In addition to continuing to promote best practice, the Scottish Government must also focus on employers that have not adopted fair work practices.

While we know that most households needing support from food banks in our network do not have anyone in work when they visit a food bank, of those that do, almost half (43%) have been working on a temporary, zero-hours or short-hours contract basis. This reflects the findings of the 2019 A Menu for Change report¹² which found that moving in and out of temporary work triggered cycles in and out of acute food insecurity because of gaps in income. Scotland will not meet its commitment to be a Fair Work Nation by 2025 if insecure work is driving people to food banks. Linked to this increase in concerted action to make work pay, there must be a focus on ensuring Scotland's social security system serves as a responsive and reliable safety net. When people move in and out of work or onto or between benefits, adequate and flexible protection needs to be in place to prevent the change in circumstances from causing people to fall into crisis.

The Scottish Government should 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. Engender and Close the Gap have produced a comprehensive set of policy recommendations the Scottish Government should implement to ensure Scotland's economy works for women¹³.

Where the Scottish Government currently does not have sufficient powers to act, it should aim to build a consensus at Holyrood to support the transfer of new powers required to meet the goal of ending the need for food banks and other charitable food aid, such as the devolution of employment law. However, the priority should be to make the most of existing powers. We welcome the progress made last year with the introduction of a requirement to pay the real Living Wage to public contracts and look forward to further action to embed fair work principles in every workplace in Scotland, including to end the use of exploitative zero-hours contracts, which make it impossible for people to budget.

4. Improve support for disabled people

Our latest State of Hunger research found that disabled people were more likely to need to use a food bank. Over three quarters (77%) of working age people in Scotland referred to our food bank network in early 2020, were disabled (as defined by the Equality Act 2010). This is over twice the rate in the general Scottish working-age population, where 30% of working age adults have a disability.

Where the Scottish Government does already have powers, for example, in respect of devolved disability benefits, the opportunity must be taken to deliver these benefits differently in order to reduce poverty and destitution. During the assessment process for the new Adult Disability Payment, there needs to be a focus on ensuring the right decision is reached the first time, taking into account all supporting evidence and we

¹² <https://amenuforchange.files.wordpress.com/2020/01/found-wanting-a-menu-for-change-final.pdf>

¹³ [Recovery \(engender.org.uk\)](https://engender.org.uk)

welcome the commitment of the Scottish Government to putting dignity, fairness, and respect at the heart of Scotland's social security system. But a more caring approach needs to be matched with increased benefit levels and better eligibility criteria, if it is to provide the enhanced support disabled people need.

Improved financial support for disabled people would lead to a reduction in the need for food banks in Scotland. The Scottish Government should use its devolved social security powers to improve the sufficiency, accessibility, and responsiveness of benefits, to better support disabled people, whether in or out of the labour market. For example, the eligibility criteria for Adult Disability Payment (ADP) should be changed to remove the twenty-metre rule for the enhanced mobility rate and, across the board, payment rates should be increased to ensure all disabled people and people living with a health condition in Scotland (and their carers) receive adequate financial support.

5. *More action to end homelessness*

Everyone in Scotland should have a safe, warm, and affordable home. We welcome the significant progress made by the Scottish Government, local authorities, and housing associations, in delivering more affordable homes and the commitment to deliver a further 110,000 affordable homes (including 70% for social rent) by 2032. However, if it is to become a reality, this commitment needs to be matched by sufficient funding. The budget currently in place is not sufficient to deliver this bold target¹⁴ and to tackle Scotland's housing crisis. The building programme needs to be accelerated over the next five years if we are to address Scotland's chronic housing shortage and end homelessness.

Affordable social housing is central to the cycle of poverty yet, according to Shelter, there are over 13,000 households in temporary accommodation, including more than 7,000 children¹⁵. Around a third of people referred to Trussell Trust food banks report being made homeless in the 12 months prior to needing to access charitable food aid. As well as ensuring action to end homelessness is sufficiently funded, the Scottish Government should carry out further analysis to better understand the relationship between homelessness and food bank use. In addition, the Scottish Government should review Discretionary Housing Payments to ensure adequate financial support for people affected by the UK Government's benefit cap.

6. *Make transport more affordable and accessible*

Transport costs can be a significant barrier for people looking to increase their incomes by taking paid work, as well as needing to attend social security appointments and visit support services. We support the Poverty Alliance's Everyone Aboard campaign, which calls for free bus passes to be extended to people on Universal Credit. This is an example of an action the Scottish Government can deliver which would make a real difference to people in financial crisis and at risk of needing to access charitable food provision.

¹⁴ <https://www.insidehousing.co.uk/news/news/scottish-budget-831m-affordable-housing-spend-higher-than-expected-but-not-enough-say-sector-bodies-73660>

¹⁵ https://scotland.shelter.org.uk/housing_policy/key_statistics/homelessness_facts_and_research

7. *Extend free school meals to all*

We support the Scottish Government's expansion of free school meals and action to ensure families with children can access free school meals all year round. We support the STUC's campaign for universal free school meals, to ensure every child and young person at school in Scotland receives at least one nutritious meal a day. It is disappointing that the roll-out of free school meals to P6 and P7 children has been delayed and there is no clear commitment on when the necessary capital and revenue spending will be provided to local authorities to fully roll out this policy. We urge the Scottish Government to implement this commitment in time for the start of the new school year in August 2022, to ensure every primary school child in Scotland receives at least one healthy meal every day. We would also like to see a clear timeline for the introduction of free school meals to all young people in Scotland's secondary schools.

8. *Take speedier action to tackle child poverty*

More than one in four (260,000) of Scotland's children are officially recognised as living in poverty¹⁶, with 13% of children living in material deprivation, in families that cannot afford essentials such as a warm winter coat. The JRF's most recent Poverty in Scotland report found that 16% of children were trapped in poverty for at least three to four years. This is more than three times higher than the Scottish Government's target of less than 5% of children being trapped in persistent poverty¹⁷. Without a far greater scale and pace to activity designed to reduce child poverty, the Scottish Government will fail to meet its own targets by a significant margin and too many children will continue to be caught in a cycle of poverty.

Of the families supported by our network, larger families with three or more children were over-represented: 15% of households referred to Trussell Trust food banks in late 2018 or early 2020 had three or more children. We therefore welcome the commitment to double the Scottish Child Payment (SCP) to £20 a week from April 2022 and to roll it out to all under 16s by the end of this year. However, while the SCP has the potential to provide a significant boost to family income levels, there continue to be real challenges around take-up of this new benefit; addressing these will be central to achieving its policy goals. This contrasts with Child Benefit which is delivered universally and has one of the highest take-up rates of any benefit. In addition, the SCP has not yet been rolled out to older children, which means that children currently lose SCP when they turn six years old.

The Scottish Government should consider all options to maximise take-up of SCP, accelerate its roll out to six-16-year-olds and increase the level of payment so that Scotland's interim child poverty targets can be met by 2023/24¹⁸.

¹⁶ [Poverty and income inequality statistics - gov.scot \(www.gov.scot\)](https://www.gov.scot/resources/documents/2021/04/20210420_Poverty_and_income_inequality_statistics.pdf)

¹⁷ <https://www.jrf.org.uk/report/poverty-scotland-2021>

¹⁸ Fraser of Allander analysis concludes that the "good news is that, based on the assumption of broad economic recovery over the next few years, our analysis shows that meeting these (Child Poverty) targets is possible with the powers that the Scottish government currently hold" and that "if the Scottish Child Payment was used alone to meet the target, a payment of £40 a week would meet the interim target and cost in the region of half a billion a year". [Poverty and inequality: looking pre- and post- pandemic](#) Fraser of Allander Institute, 2021

In developing schemes to boost income levels for families, the Scottish Government should streamline the number of benefits and payments to reduce the current complexity of the system and ensure a more targeted approach to reducing poverty. For example, payments to families, such as the SCP and school clothing grants, could be automated to reduce complexity and ensure all eligible families receive the support they are entitled to. Consideration should be given to all possible options for improving delivery, including universality and ending the need for families to apply for each form of support. The Trussell Trust has commissioned research in partnership with Save the Children Scotland to look at the impact of the SCP so far and recommendations for change. We look forward to sharing our research in early 2022.

Finally, given the fact that current child poverty levels in Scotland sit at more than double the 2030 target¹⁹, it is vital the forthcoming Child Poverty Delivery Plan is bold enough to put Scotland on a path to meet both the interim and 2030 targets.

9. *Prioritise a fairer approach to debt*

Debt is an almost universal experience for people needing to turn to food banks, and this was already the case before Covid-19 hit. Our State of Hunger research found that almost all (90%) households who needed to use a food bank on the eve of the pandemic were in some form of debt. The pandemic has plunged people into even deeper forms of debt.

For people referred to a food bank in Scotland in late 2018 or early 2020, ‘family or friends’ were the most common source of loans (43%), but one in three (35%) owed money to the DWP and one in five (20%) of all households had a high interest loan²⁰. 58% had arrears on bills and owed money on loans. This was many times higher than the equivalent figure for working age adults in the general UK population (6%) and working age adults in the general UK population who are in relative poverty (15%). Arrears on rent were most common, with four in ten (38%) people referred to a food bank in Scotland in late 2018 or early 2020 in rent arrears. 33% said they were in arrears on council tax (including water), which is broadly in line with the rest of the UK (34%). Most people (75%) referred to food banks in late 2018 or early 2020 were in arrears on one or more bills.

At a UK-level, we are calling on the government to act to ensure people facing destitution do not have to repay debts they simply cannot afford. There is also significant scope for progress at Scottish-level, where action to help people with rent and council tax arrears would help reduce the need for charitable food aid in Scotland.

Scottish council tax debt was the most common debt issue reported to Citizens Advice by people seeking debt advice. To prevent people from being pushed into destitution through often-punitive council arrears collections, a more supportive system for the recovery of council tax debt should be put in place. The Scottish Government should continue to develop good practice in affordable

¹⁹ <https://www.jrf.org.uk/report/poverty-scotland-2021>

²⁰ <https://trusselldev.wpengine.com/wp-content/uploads/sites/2/2022/01/State-of-Hunger-food-bank-use-poverty-and-destitution-in-Scotland.pdf>

repayment and debt write-off, alongside mitigation of debt recovery, in line with the CAB council debt collection charter¹⁵²¹ and work in partnership with COSLA to support councils to adopt best practice.

In addition, the Scottish Government should continue to fully fund the Council Tax Reduction Scheme, which provides significant support for people most at risk of needing to use a food bank. Any rolling back of this scheme would cause increased financial hardship amongst groups who are already most likely to need to access charitable food provision.

10. *Introduce a Minimum Income Guarantee*

A Minimum Income Guarantee for all reflects the Trussell Trust's values of compassion, justice, community, and dignity. Setting an income floor below which no-one should fall should be a hallmark of any society. Furthermore, by enabling people to make choices for themselves and their families, such a guarantee offers a much more dignified approach to supporting people at risk of destitution. A Minimum Income Guarantee would also provide businesses and other employers with a practical standard against which they support people to secure a good standard of living. It could also transform how we value unpaid care and ensure that destitution is consigned to history.

However, to deliver a Minimum Income Guarantee by 2030, the Scottish Parliament would require further powers to be devolved in relation to both social security and tax. The Scottish Government should begin the process of requesting these powers so progress can be made without further delay. In the meantime, Scotland already has significant scope to act to end poverty and all available policy levers need to be focused on this ambition, including raising the level of social security and family payments to boost household incomes and action to guarantee that no one in Scotland experiences destitution. People living in poverty and destitution cannot afford to wait for Holyrood to gain additional powers; we need urgent action now to increase incomes until a Minimum Income Guarantee can be delivered in full.

11. *Incorporate the Right to Food into Scots law*

We welcome the Scottish Government's commitment to strengthen the protection of human rights, including the right to food. The Scottish Government must act to give practical effect to the right to food by incorporating it into Scots law. The Good Food Nation (Scotland) Bill would be the ideal opportunity to do this and we would support amendments to this Bill to include a right to food.

There is strong public and cross-party support for a legal right to food, which we believe would underpin the Scottish Government's efforts to ensure no-one in Scotland goes hungry. A right to food would drive policy change, ensuring that cash and income-based strategies to end food insecurity are central to all strands of Scottish Government policy. We also support the Scottish Food Coalition in their call for an Independent Food Commission to oversee the delivery of a right to food for all.

²¹ [council_debt_collection_10.06_002.pdf \(cas.org.uk\)](#)

12. Better support for people with no recourse to public funds

Our State of Hunger 2021 research found that before the pandemic, 2-4% of people referred to food banks were likely subject to the No Recourse to Public Funds (NRPF) condition, this rose to 11% in mid-2020²². The Scottish Government's *Ending Destitution Together* strategy is welcome but if we are to end the need for charitable food aid in Scotland, better support for people with no recourse to public funds needs to be integral to the action plan. Asylum seekers are almost all destitute, receiving just £5.66 per day to live on, making food insecurity a daily reality.²³ These rates mean that destitution is built into the asylum system. If we are to end the need for food banks and charitable food aid in Scotland, we need better financial support for people with NRPF. This should include:

- Access to either the SWF or another form of cash-based crisis support
- Financial support for children, for example the SCP bridging payments, so long as this can be delivered in a way that does not impact on a person's immigration status or asylum support payments. Without this, there will always be children left behind as Scotland makes progress in tackling child poverty.
- Free bus travel, to prevent asylum seekers having to choose between travel and food.

Additional support for people accommodated in hotels, currently receiving just £8 per week, and for people currently dependent on cashless section four support.

b) HELP LOCAL SERVICES WORK TOGETHER TO ENSURE PEOPLE GET THE RIGHT SUPPORT AT THE RIGHT TIME

We know that people who need to use food banks have extremely low incomes. On average, people referred to food banks across our UK-wide network are managing on £50 a week after housing costs. Living on an extremely low income is frequently compounded by many other hardships including insecure work, high levels and multiple kinds of debt, inadequate housing, and poor mental and physical health.

Not only are households facing multiple hardships, but some people are also more likely than others to fall through the gaps between available support services and face destitution. The pandemic has exposed some of these fault lines, as we saw people from ethnic minorities and people who may have no recourse to public funds over-represented at food banks during the summer of 2020. The complexity of the multiple hardships people are facing requires intervention from a range of services.

Ensuring effective and integrated support services is particularly vital given that we know low-income households can face significant barriers to accessing existing informal and formal local support. Trussell Trust research has found that nearly nine in ten people referred to a food bank were unable to draw on support from friends, family, or local support organisations.

²² <https://www.trusselltrust.org/wp-content/uploads/sites/2/2021/05/State-of-Hunger-2021-Report-Final.pdf>

²³ <https://www.refugeecouncil.org.uk/information/refugee-asylum-facts/the-truth-about-asylum/>

We know from our research that adverse life experiences are a significant factor in food bank use, with 72% of people referred to a food bank in early 2020 having had at least one adverse life experience in the previous 12 months. The most common type of adverse experience was homelessness at 30%, with bereavement, substance misuse, domestic abuse and family breakdown also commonly reported. These challenges are often compounded by the design of systems intended to provide assistance, as well as the lack of availability of support or advocacy to navigate these complicated systems.

Once again, this highlights the need for investment in effective money and welfare rights advice to ensure people can get the right support at the right time.

While income maximisation and advice services are quite prevalent, food banks in the Trussell Trust network are reporting that people face multiple barriers to access them, including not having enough phone credit or internet access, long waiting times, confusion about knowing where to go and lack of trust. This needs to change if we are to ensure people in crisis receive the advice they need in a timely fashion, to prevent a short-term crisis becoming long-term hardship.

We believe the Scottish Government should focus on the following actions to ensure local services work together to deliver the right support at the right time:

1. Universal access to high-quality, one-stop advice services
2. Improved funding for local authorities
3. Better referral pathways and learning from best practice
4. Improved mental health services
5. A right to independent advocacy for all

1. Universal access to high-quality, one-stop, advice services

High-quality, one-stop advice services should be available in every community. Good advice helps prevent a short-term crisis becoming a long-term hardship as well as preventing the short-term crisis even occurring in the first place. We need a “no wrong door” approach, enabling people to access the support they need in one place rather than being passed from one agency to the next. Local advice and support services should increase their presence in non-stigmatising settings, for example health centres, schools, support cafes and community centres, building on the evidence from the A Menu for Change project.

Advice at the point of crisis plays a huge role in helping individuals to access cash-first support, maximise their income, retain access to housing, energy, and warmth, and reduce crisis debt. This can support individuals to ensure crises will not re-occur, by tackling the causes that led to the crisis in the first place. Wherever possible, the person in crisis will have a choice of how they access advice or help to enable them to access support and advice to maximise their income in a way which suits them.

The Scottish Government directly funds the Money Talk Team, and this support should be widened both in size and scope beyond exclusively targeting low-income families. The service should be expanded specifically to support all those in financial crisis. Access to the Money Talk Team should be widened to ensure food banks, and crucially

people who use them, have good access to this service, and that those most at risk of financial crisis are supported. Publicity and marketing should be particularly targeted throughout the food bank network and communities most likely to be at risk of destitution and financial crisis, as well as to services referring to food banks and other charitable food providers.

In particular, the key groups supported by the team should be widened to encompass all those who are at higher risk of experiencing financial crisis and therefore more likely to have trouble affording food, fuel, and other essentials, rather than concentrating simply on vulnerable families and older people, as at present. This includes people who have no recourse to public funds, particularly refugees and asylum seekers, younger people, disabled people, lone parents, minority ethnic households including gypsy/traveller communities, younger parents (under 25), families with children under one, larger families, people living in households on low incomes and people living in the most deprived areas. In addition, the remit of the Money Talk Team should also be expanded to ensure that crisis support is an intrinsic part of its work and that they can respond appropriately when presented with individuals in crisis need.

We should learn from advice provision in housing services and place a statutory duty on local authorities to ensure that any individual in crisis can access free, confidential, and independent money and welfare rights advice. It must be available and accessible to all people in a timely manner, to support them at a time of crisis and focus on ensuring that preventable crisis situations do not re-occur. Additional resources must be allocated to local authorities to enable them to meet any new statutory requirement.

2. Improved funding for local authorities

Local authorities have a key role to play in ending the need for charitable food aid locally and implementing initiatives to end the cycle of poverty, but this can only happen if local authorities are properly funded. For example, in 2019/20 local authorities secured £400 million financial gain for individuals through their welfare rights and advice services, and this has increased each year since 2017/18²⁴.

Local authorities across Scotland provide lifeline local services to support people in crisis yet, between 2013-14 and 2021-22, they have seen a real terms cut in their budgets of 2.1%, at a time when the Scottish Government budget has increased by 2.3%, undermining their ability to deliver lifeline local services in their communities²⁵. The further cut of 2.4% to local authority budgets included in the 2022 Scottish Budget²⁶ could undermine local anti-poverty work and the ability of local councils to support the Scottish Government's action plan to end the need for food banks in their communities.

²⁴ [Common Advice Performance Management Reporting Framework: 2019/20 Annual Report](#)

²⁵ [Local government finance: concepts, trends, and debates | Scottish Parliament](#)

²⁶ [Budget 2022-23: Mind the \(Block Grant Adjustment\) Gap - SPICe Spotlight \(spice-spotlight.scot\)](#)

3. *Better referral pathways and learning from best practice*

If we are to end the need for charitable food provision in Scotland, we need to build a seamless support system that ensures everyone gets the right support at the right time. Every community in every part of Scotland needs a robust network of local support that works together to prevent a short-term crisis becoming long-term hardship by addressing the root causes - often called a referral pathway. There are a multitude of local services, provided across sectors, including family support services, housing support, social work, debt, and financial advice, which help to maximise incomes and address underlying needs. These services must receive adequate levels of investment and long-term funding, so they can support people effectively and should encompass community food settings, in addition to health centres and schools.

Frontline services working with people who may be at risk of food insecurity should adopt an advice-first principle instead of a food-first approach, ensuring people in financial crisis are supported to access all the financial support to which they are entitled. The excellent Independent Food Aid (IFAN) Network ‘Worrying about money?’ leaflets are a useful resource to support this²⁷.

Local advice and support services should have an increased presence in non-stigmatising settings, for example in health centres, schools, support cafes and community centres, with provision targeted in community regeneration areas and clear coordination and collaboration between the advice sector and community food initiatives.

There is valuable learning from the Child Poverty Act about how to translate national plans into local action through the development of local child poverty delivery plans. A national action plan to end the need for food banks could be translated into local action by supporting councils and Health and Social Care Partnerships to develop local strategies to ensure no-one is referred to charitable food aid without knowing what cash-based options are available to them and receiving any necessary support to claim them.

We would recommend:

- Every service that refers people to charitable food provision should adopt and implement a robust, written onward referral policy to advice and support services.
- The delivery of annual training and capacity building workshops for all organisations that refer people to charitable food aid, aimed at increasing referrals to advice and support services and reducing referrals to charitable food aid.
- Action is taken to encourage and support services to work closely together to reduce food insecurity, including maintaining a cross-sectoral group specifically responsible for creating and implementing a local action plan for tackling food insecurity. The group should include people with lived experience of poverty.

²⁷ [Cash First Leaflets - Independent Food Aid Network UK](#)

Additionally, councils and Health and Social Care Partnerships should work to raise awareness and understanding of Scottish Welfare Fund crisis grants to people in financial hardship. Actions could include involving people with lived experience of food insecurity and frontline support workers in a local review; disseminating information in professional and community settings; and developing and implementing a local advertising and social media campaign to increase awareness.

We welcome the Scottish Government's leadership on developing referral pathways through its proposal to invest in cash-first local partnership work to reduce the need for charitable food aid. We recognise this approach draws on the learning of the A Menu for Change partnership project, IFAN's cash-first referral leaflets and early insights from the Trussell Trust's Pathfinders project. We are keen to ensure that any pilot projects in this area are allocated enough resources to trial this work effectively across different local authorities, whether small, rural, or large. The proposed funding must be sufficient to enable the pilots to be delivered effectively, especially in local authority areas with larger populations, and should be reviewed urgently to ensure this is the case.

We should build on the track record of effective income maximising local referral pathways that have already been tested or are operating in Scotland. These include:

- **Moray's Flexible Food Fund**, launched in 2020 to provide financial support to individuals and families experiencing difficulties in accessing income to pay for food during the COVID-19 crisis. You are eligible if you are in receipt of another benefit and the award is two monthly cash payments, varied according to household size (from £70 to £460). The fund is administered by the local authority's Money Advice Moray team, which also undertakes a full benefits check, provides debt and money advice, and refers to other appropriate support services.
- Since December 2015, **30 GP practices in Glasgow** have embedded financial, housing, social security, and debt advice in their practices to increase income via improved access to social security and employment and to reduce household outgoings. A Glasgow Centre for Population Health evaluation (2017/18) identified an average financial gain of £8,254 per patient (median £1,453) and an average debt managed of £4,356 per patient (median £1,993). Patients have achieved a total financial gain of £5,042,608 over the last four years.

4. Improved mental health services

While benefit levels and benefit issues are the most common reason for a food bank referral, it is increasingly the case that people referred to food banks in our network are experiencing poor mental health. Poor mental health affected over half (54%) of households referred to our food banks in 2020. The link between poor mental health and food insecurity should be fully considered when designing health services and highlights the urgent need for further preventive spend on mental health support services to ensure people do not fall through the gaps. It is also vital that people with experience of using mental health services are involved in their design and improvement. The implementation of clear local referral pathways would help people better navigate the support they are seeking.

5. *A right to independent advocacy for all*

We believe everyone should have the right to independent advocacy but, currently, not everyone who is either using a food bank or at risk of food insecurity is eligible. Widening access to independent advocacy would help people get support, in the right way and at the right time, as well as helping people stay better engaged with support services. It would help prevent situations from escalating and crises developing and be transformative for people living in destitution, many who are not currently eligible to receive independent advocacy support. As well as acting to deliver universal access, the Scottish Government should consider national funding of independent advocacy services to ensure everyone who could benefit from independent advocacy support is able to access it in a timely fashion. We support the call of the Scottish Independent Advocacy Alliance for the right to access independent advocacy to be guaranteed in Scots law.

c) INVOLVING PEOPLE WITH DIRECT EXPERIENCE OF POVERTY, AS WELL AS LOCAL FOOD BANKS AND SUPPORT SERVICES, IN SHAPING AN ACTION PLAN TO END THE NEED FOR FOOD BANKS

If the Scottish Government is to effectively tackle poverty and destitution, it is vital that policy solutions are co-designed with people affected by poverty in order to learn from their experiences. This builds on years of best practice in Scotland, led by the Poverty Truth Community and others, and built into Social Security Scotland and the Poverty and Inequality Commission.

We have seen the value of in-depth participation in shaping policy ourselves, working with people with experience of being in debt to the government, including some participants from Scotland. We found that participants that had been through the participatory process were able to really contextualise and imagine the blockers and enablers of potential solutions, whereas respondents who hadn't been supported in the same way found it harder to see a way out. Participants also felt listened to and empowered to engage in advocating for change in the area. We therefore strongly welcome the fact that the Scottish Government is consulting directly with people with lived experience in the development of the action plan - this engagement needs to continue as the plan is implemented.

In seeking to implement the action plan, the Scottish Government should also work in partnership with food bank staff and volunteers. Food banks serve their communities, often having been in place for a number of years, and are therefore very well placed to support transformation to address the underlying drivers of food bank use. Food banks can drive initiatives, such as income maximisation projects, or work with other existing services that can help end the need for their services. This will play a vital role in delivering any exit plan for ending the need for charitable food aid.

At the Trussell Trust, we have initiated several programmes to support food banks to identify steps that reduce the need for their services locally, including the Pathfinder programme (supporting food banks to implement a strategic and holistic approach), the organising project (supporting food banks to work with key local partners) and on financial inclusion (providing resources for food banks to increase the financial inclusion support available to visitors to the food bank).

Like the Trussell Trust, IFAN is also committed to ending the need for charitable food aid and is supporting its member organisations to achieve this goal.

We welcome the Scottish Government's commitment to work alongside these networks of food banks, our members, and people with direct experience of accessing food aid, to provide practical assistance in developing transition and exit strategies.

In addition to involving people with lived experience of food insecurity in the development and delivery of the national action plan, at local level, local authorities should create and implement clear pathways for involving people with lived experience of food insecurity in informing local strategic groups and decision making. All levels of government need to do more to work with people in their communities to design, shape and deliver policy solutions.

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?

We would recommend that any approach to measuring the impact of the proposals to end the need for food banks takes the following approaches:

- **National monitoring of levels of food bank use**

The Scottish Government should track the national rates of food bank use through the recently included questions in the UK Family Resources Survey. These questions also allow for measurement of the scale of support provided, by asking about the number of parcels that have been provided to people over a given period. Monitoring and assessing changes to these figures will allow the Scottish Government to evaluate progress against a robust data source and understand change against the other nations and regions of the UK.

- **Monitoring levels of use seen by organisations that provide food parcels**

In 2021, the Trussell Trust supported a network of 43 food banks operating out of over 130 food bank centres in Scotland. Our most recent data shows these food bank centres provided over 84,500 food parcels to people facing hardship between 1 April 2021 and 30 September 2021²⁸ However, we know that the scale of need in Scotland is much more significant than just food parcels provided by food bank centres in the Trussell Trust network. Indeed, IFAN's membership includes 124 food banks in Scotland that are not part of the Trussell Trust network. IFAN estimates there are at least 171 independent food banks, plus many more charitable food aid providers, operating across Scotland. These figures also do not include the many food banks run by schools, universities and hospitals, and most Salvation Army food parcel distributors.

Therefore, we would recommend triangulating the results of the UK Family Resources Survey with data collected by organisations that provide charitable food to people facing hardship. A weakness of even large-scale social surveys is that they can exclude

²⁸ [Mid-Year Statistics, \(2021\), The Trussell Trust](#)

people facing hardship who are not living in private households. Some examples of people that may be harder to reach with these methods may include people who are sleeping rough, or are otherwise of no fixed abode, hidden households, or households living in other homeless accommodation or households of multiple occupancy. By solely relying on these surveys to measure levels of food bank usage, the Scottish Government would likely systematically undercount the overall scale of use in Scotland.

The Scottish Government should work closely with and, where appropriate, provide support for robust data collection by, organisations that provide charitable food aid to people. By doing so, they will be better placed to review, analyse, and understand trends in data made available by these organisations and importantly understand the broader context of need.

- **Monitor overall levels of need for food banks through a measurement of destitution in Scotland**

There are a number of ways in which the goal of ending the need for food banks could be achieved. At the Trussell Trust, our commitment to this goal stems from our values and our convictions about dignity. For us, ending the need for food banks means Scotland becoming a nation in which everyone can afford the essentials. Our belief is that, by simply focusing on actual use of food banks, you will necessarily exclude people who do not use food banks, for any number of reasons, despite not being able to afford the essentials. This could include lack of access to food banks, reluctance to use these services, cutting back on or stopping spending on other essentials rather than food, or people who are reliant on support from friends and family for the essentials.

Our support for this measurement approach also underpins our view that income-maximising solutions are needed to end the need for food banks. In-kind solutions, such as shopping vouchers, which de facto replace the use of a food bank, may not tackle the underlying need and risk conflating reducing *use* of food banks with genuinely ending the *need* for food banks.

Measuring the extent to which household incomes are proving sufficient to meet the cost of essentials is therefore critical. The measurement that we would recommend in this context is the Joseph Rowntree Foundation definition of destitution used in their *Destitution in the UK* report delivered by Heriot-Watt University²⁹.

The strength of the Joseph Rowntree Foundation's measurement is its ability to reach people that are not typically covered in social research methods. These can include people who are sleeping rough, or are otherwise of no fixed abode, hidden households, or households living in other homeless accommodation or households of multiple occupancy.

To monitor the progress towards ending the need for food banks, the Scottish Government should work with the Joseph Rowntree Foundation to expand the measurement of destitution in Scotland. Alternatively, it could commission its own

²⁹ <https://www.jrf.org.uk/report/destitution-uk-2020>

measurement of the number of people who cannot afford the absolute essentials in Scotland, but this should be designed to reach people facing hardship.

It may also be of value to look at the converse of this for example, what percentage of the population lives in households that *are* able to afford the essentials. This would provide a positive, stretching but achievable framework for change.

- **Robust evaluation of policy interventions**

The Scottish Government should ensure that robust evaluations are in place to measure the impact of individual policy interventions on both the population at risk of needing support from a food bank (destitution) and overall use of food banks put in place by the Scottish Government. This should include clear targets to reduce the need for charitable food provision by 2030, aligned with the interim and final targets for reducing child poverty.

At the Trussell Trust, evidence from food bank referrals and people using food banks shows that issues around the design and delivery of social security - including the accessibility of the application process, experiences during the application and subsequent claims process, eligibility criteria and the absolute value of benefits - are frequent drivers behind people needing support from a food bank. To learn about what works in reducing the need for food banks, the Scottish Government should ensure that all policy changes to the design and delivery of social security in Scotland should include a measurement of the impact of these changes on need for and use of food banks in their evaluation plans.

The Scottish Government should actively seek to engage with organisations that collect data on use of food banks, such as the Trussell Trust and IFAN, to understand the impact of any local or national level policy interventions on the levels of need seen by these organisations.

The Scottish Government should also regularly review the evidence provided on what works for reducing need for food banks. Networks such as the Trussell Trust and IFAN, and the individual food banks within those networks, often engage in local level pilots with the objective of reducing need. The Scottish Government should work with these organisations to regularly review what can be learnt about activities to reduce the need for food banks.

Reducing the need for charitable food provision should also be integral to the Scottish Government's next Tackling Child Poverty Delivery Plan.

- **Including the voices of people with lived experience of the problem in the evaluation and design of current and future policy interventions affecting incomes and ability to afford the essentials amongst people at risk of destitution.**

The Scottish Government should ensure that, throughout the implementation of its plan to end the need for food banks, it places the lived experience of people who are destitute or have experienced destitution at the heart of policy development and evaluation. People with lived experience should be supported to unpick and identify the flaws in the systems that should protect people from destitution, as well as

defining and shaping best practice to protect people from being at risk of needing to use a food bank.

By placing people at the centre of plans to monitor the impact of change designed to reduce the need for food banks, the Scottish Government will be better placed to understand what policies may be most effective in reducing need, if these changes are having an impact on levels of need, and why they are or are not having an impact on levels of need.

This approach is particularly powerful when looking at changes to disability benefits in Scotland, and changes to the Scottish Child Payment.

- **A Dignity Charter**

Flagship policies to support people in crisis, such as the Scottish Welfare Fund and Scottish Child Payment, should be backed up by a new Dignity Charter, building on the Scottish Government's approach of putting dignity and respect at the heart of our new social security system. We note the development of *Our Charter*, to guide the delivery of Social Security Scotland's work. Given the complexities and challenges for people in Scotland in navigating local, national, and UK-wide social security systems and support, we recommend the impact of *Our Charter* is reviewed before it is extended to set out agreed standards every citizen should expect when accessing social security in Scotland, whether delivered locally, nationally, or UK-wide.

This process should be led by people with direct experience of social security. For example, we have worked with people who have lived experience of a range of government debt to co-produce a set of recommendations which imagine what a fairer system could look like. The group prioritised the principles of respect, clarity, and flexibility, and these principles should inform a fairer approach to accessing social security in Scotland.

Adoption of the Dignity Charter would be voluntary and used to shift behaviour and encourage adoption of best practice.

6. Is there anything else that you think should be considered in the development of the plan?

- The success of the action plan will depend on ongoing collaboration between the Scottish Government, local government and third sector and therefore we would suggest the Steering Group on Ending the Need for Food Banks should play a key role in measuring progress and outcomes. The work will need to be fully resourced, with both national and local funding streams, to ensure ongoing input is meaningful and drives successful delivery of the national plan. The Scottish Government should work in partnership with other funders to support the national plan and ensure it is well resourced.

- A national network of projects tackling food insecurity could be established to enable the whole emergency/community food provision sector to share best practice, understand income maximisation, poverty, and destitution, and how to design out charitable food provision as a response.
- We would like to see a clear timeline agreed for the implementation, monitoring and reporting on the delivery of Scottish Government's National Action Plan, including actions already underway and additional actions included. The plan should be agreed by June 2022, ensuring it is in place within the year, as called for by the Trussell Trust and the Independent Food Aid Network in May 2021 and agreed to by the First Minister. Targets should be set to reduce the need for charitable food provision by 2030, to align with other national targets and progress on delivery should be reviewed annually.
- We strongly welcome the Scottish Government's focus in the draft plan on working with the Trussell Trust and IFAN to end the need for food banks. However, if the Scottish Government is to achieve the objective of ending the need for charitable food aid as a primary response to food insecurity in Scotland, then the delivery of the plan should involve all community food providers.

Ultimately this plan is about ending poverty and destitution in Scotland, not just the need for food banks.

We want to see a Scotland where no one needs to access charitable food aid and where everyone has enough money to afford the essentials.

Our hope is that the launch of the Ending the Need for Food Banks Action Plan will drive real and transformative change for people in every community of Scotland who currently need to access charitable food or face food insecurity.

We have the power to shape a brighter future for Scotland, where no one goes hungry. The Scottish Government must use every policy lever at its disposal to achieve this ambition and end hunger in Scotland once and for all.

We look forward to working with the Scottish Government and other partners to realise our shared vision of a hunger free future.