

# Policy and Sustainability

10.00am, Tuesday, 22 February 2022

## Ending the need for food banks: City of Edinburgh Council response to consultation on a draft national plan

Item number	Executive
Executive/routine	
Wards	All
Council	
Commitments	

### 1. Recommendations

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- 1.1 To note the response to the Scottish Government's consultation on a draft national plan to end the need for foodbanks, approved by the Executive Director of Corporate Services in consultation with the Leader and Depute Leader under urgency provisions set out in A4.1 of the Committee Terms of Reference and Delegated Functions so as to meet the consultation deadline.

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## Ending the need for food banks: City of Edinburgh Council response to consultation on a draft national plan

### 2. Executive Summary

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- 2.1 This report summarises the Council's response to the Scottish Government's consultation on a draft national plan to end the need for food banks.
- 2.2 The response notes that Government proposals align with Council priorities as set out in the End Poverty Edinburgh Action Plan, and the Council Business Plan. The draft national plan is also in alignment with the 2020 findings of the Edinburgh Poverty Commission and its call for local and national agencies to improve income security as a means of avoiding reliance on foodbanks and to develop place-based approaches to bring together healthy eating, sustainability and community development.
- 2.3 The Council's response to the consultation specifies a range of areas where further consideration or clarification by the Scottish Government would be helpful and the need for fair, sustainable funding to deliver all of the measures.

### 3. Background

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- 3.1 The Scottish Government have drafted a national plan outlining its vision and approach to [ending the need for food banks](#) as a primary response to food insecurity. Consultation on these proposals opened on 20 October 2021 and the closing date was 25 January 2022. The Scottish Government will use feedback and suggestions to inform the final plan.
- 3.2 The vision is that everyone has a sufficient and secure income to be able to access food that meets their needs and preferences. Where financial hardship does occur, coordinated local responses prioritise access to emergency financial assistance and money advice alongside access to holistic support services. Where help to access food is needed, this is provided in a way that maximises dignity and reduces future need.
- 3.3 The plan presents a summary of action underway to prevent poverty and sets out intentions for further actions. The activities are underpinned by a human rights

approach which prioritises action that prevents poverty and promotes cash-first responses alongside holistic support services where needed.

## 4. Main report

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- 4.1 The Scottish Government's current approach has two elements: preventing the need for emergency food provision arising, and cash first, dignified responses when food poverty does arise.
- 4.2 Their proposals for further actions include: a commitment to delivering a minimum income guarantee, increasing access to emergency financial assistance, money advice and holistic support services; key stakeholders (food banks, money advice services, local authority officers and public health) working together to develop the best response for their local area; piloting the use of shopping vouchers; developing shared values for all stakeholders on access to emergency financial assistance and holistic support services.
- 4.3 These proposals align with a number of existing Council plans and priorities, including:
  1. The Council's End Poverty in Edinburgh Delivery Plan and its actions to improve income security and reduce the cost of living for people in poverty in Edinburgh
  2. The City of Edinburgh Council Business Plan, and its commitment to deliver partnership actions for a long-term support and intervention strategy to prevent food poverty and food insecurity; and,
  3. The Council's 20-minute Neighbourhood Strategy, and its aim to deliver sustainable, safe and resilient neighbourhoods where residents have equal access to most of their daily needs, including access to local shops and support services.
- 4.4 The Council's response to the Scottish Government's consultation makes the following key points to support the further development of the national plan and its implementation:
  1. Even with the most highly effective supports in place to prevent poverty, there will always be individuals who fall into crisis for unavoidable reasons and who need emergency food support. The key aim for the national plan should be to ensure that support is available and accessible when it is needed, that the support is provided in a way that is dignified and respectful, and that people are helped in a way that ensures their crisis is temporary and prevents future harm.
  2. High quality welfare advice is crucial to reducing poverty but needs strong, sustained, and appropriately resourced infrastructure. In the context of a rising cost of living crisis which is increasing demand for advice services as well as risk of food insecurity, advice providers face challenges to secure sustainable funding for community-based services in all parts of the city, as well as a shortage of appropriately skilled advice workers.

3. Increased and effective nationwide campaigns are needed to increase the take up of benefits and ensure citizens know how to access the supports they are entitled to, particularly among key groups such as older people where evidence shows take up rates are low.
  4. While 'cash first' approaches to addressing emergency need are welcomed, it is important that key mechanisms to deliver this ambition are appropriately resourced and delivered. This includes ensuring that local authorities have the resources needed to make sure that Scottish Welfare Fund, and other schemes are able to deal with food crisis applications at the point of need and paid within an appropriate time frame.
  5. Accessing food is not solely related to income – people need to have access to good quality, affordable food suppliers within their local area, with implications for local provision and transport and links with the 20-minute neighbourhood agenda.
  6. Free school meals policies have the potential to increase their impact on preventing food poverty. Potential changes could include amending eligibility to take consideration of family size, families in temporary accommodation, and considering the use of pre-paid debit cards as a means to reduce stigma, extend choice, and increase uptake.
- 4.5 The Council also states that fair, sustainable funding is needed to deliver all of the measures.
- 4.6 The response further notes that other national policy changes under development may affect the way local partners work, and the capacity of local government to implement the vision outlined in the draft plan. In particular, the development and implementation of the National Care Service could bring significant disruption to local authorities and health boards, which will have implications for the capacity to engage in other strategic areas.

## **5. Next Steps**

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- 5.1 The Council will continue to seek opportunities to engage with the Scottish Government in developing effective responses to poverty.
- 5.2 The Council will continue to work with EVOC to develop a long-term support and intervention strategy to prevent food poverty and food insecurity in all our communities, on behalf of the Edinburgh Partnership.
- 5.3 A comprehensive review of advice services in Edinburgh has been commissioned by the Edinburgh Partnership and is underway. The findings will help to determine the future scale and configuration of services, and associated implementation requirements.

## **6. Financial impact**

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- 6.1 There is no financial impact or implication for the Council at this stage.

## **7. Stakeholder/Community Impact**

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- 7.1 The findings of the Edinburgh Poverty Commission have informed the Council's response, which has been drafted with support from NHS Lothian.

## **8. Background reading/external references**

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- 8.1 [A Just Capital: Actions to End Poverty in Edinburgh](#)

## **9. Appendices**

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- 9.1 The City of Edinburgh Council response to the Scottish Government consultation on a draft national plan to end the need for foodbanks.

### Ending the need for food banks: consultation on a draft national plan City of Edinburgh Council submission January 2022

#### Q1. 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?

City of Edinburgh Council agrees with the Scottish Government's position that the need for food banks is primarily a reflection of poverty (inadequate and insecure incomes) and that they are not an appropriate or long-term response to poverty. The Council further agrees that cases where the use of foodbanks is seen as a first or only option for people in food crisis represents a failure of efforts to prevent poverty, and a missed opportunity to offer support and prevent future hardship.

The Scottish Government's approach, as described in the consultation document has two elements: *prevention* and *crisis response*. The Council agrees that this approach — preventing the need for emergency food provision arising, and cash first, dignified responses when food poverty does arise - is appropriate and is consistent with the city's own commitment to end poverty and reliance on foodbanks as articulated in the End Poverty in Edinburgh Delivery Plan.

Overall, the vision and approach set out in the draft national plan is consistent with the principles and scope of the Councils own plans, as well as with

- The findings of the [Edinburgh Poverty Commission](#), and its call for local and national agencies to improve income security as a means of avoiding a reliance on foodbanks and to develop place-based approaches to bring together healthy eating, sustainability and community development
- The Edinburgh Partnership Community Plan and City of Edinburgh Council Business Plan, and their commitments to deliver partnership actions for a long-term support and intervention strategy to prevent food poverty and food insecurity, and
- The Council's 20-minute Neighbourhood Strategy, and its aim to deliver sustainable, safe and resilient neighbourhoods where residents have equal access to most of their daily needs, including access to local shops and support services.

Notwithstanding this strong alignment, the Council's view is that further consideration is needed in the following areas of the Scottish Government's proposals:

#### ***Welfare Advice, and the need for strong, sustained, and appropriately resourced infrastructure:***

While it is agreed that access to benefits advice/income maximisation should be an integral part of ending the need for foodbanks, there are continuing challenges to resourcing the partnership infrastructure needed to deliver these services at the scale and quality required to meet demand. At present an advice review is underway in Edinburgh to scope and assess the effectiveness of partnership resources used to

fund local advice and income maximisation provision in the city, and make recommendations on the scale and patterns of funding needed for a long term sustainable advice service. On completion of this review, the Council and partners would welcome engagement with Scottish Government on implementing its findings.

In the short term, and in the context of a rising cost of living crisis which is increasing demand for advice services as well as risk of food insecurity, Edinburgh advice providers report challenges in filling vacancies for advice staff. Providers report a lack of applications from trained, skilled people and a need for additional resource to ensure adequate training is provided for new recruits. Again, the pressures and resource requirements involved in delivering the local infrastructure needed to meet Scotland wide goals should be recognised in the final national plan.

It is vital that people giving advice are skilled and accredited – incorrect advice can have major consequences for people. To ensure consistent quality of advice, local and national plans should consider introducing requirements for welfare rights and debt advisors to be registered to agreed standards, with mechanisms to ensure that there is sufficient capacity for quality assurance. National planning should also recognise that such recommendations would have further additional resource consequences for local partners.

The response to the Covid pandemic has shown the wide opportunities for effective, flexible delivery of advice by phone and digitally. There is scope to build on these opportunities to increase the accessibility of advice.

### **Crisis payments and the importance of effective promotional campaigns**

Assuming that the “cash first” approach is primarily to be delivered by Scottish Welfare Fund (SWF), the Council notes that SWF should be adequately resourced to be able to deal with food crisis applications at the point of need and paid within the stipulated time frame. This should include recognising the administrative resource costs borne by local authorities in delivering the fund. SWF guidance must be clear as possible for Local Government decision makers, particularly on the number of applications that can be made for crisis grants

An effective benefits take-up campaign is urgently needed, ensuring that older people are targeted as take up levels are known to be low. The national campaign of November 2021, it is noted, had limited impact in terms of local demand for support to claim benefits.

In general, local advice providers note that the term “money advice” which is used in the consultation document is confusing to people who can think it relates to investment planning or asset management. The terms debt advice and welfare rights advice are better understood by clients.

### **Housing costs as a critical driver of poverty and food insecurity**

The Edinburgh Poverty Commission concluded that *there is no solution to poverty in Edinburgh without resolving the city’s housing and homelessness crisis*. By extension, the findings of the Commission note that reducing housing costs must be a core part of any plan to address the challenge of food poverty caused by

inadequate incomes. The Commission further noted that this challenge was significantly more pressing in Edinburgh than in other parts of Scotland, and that 22,600 people in Edinburgh are pushed into poverty by the cost of housing alone, more than double the equivalent rate across Scotland as a whole. In line with these findings, the Council is committed to continue to work with Scottish Government and its partners to increase investment in social housing and maximise the number of social rented homes that can be delivered in the city.

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

The Council agrees that, in principle, current actions outlined in the plan (to increase income, reduce household costs, provide crisis funds with access to wraparound supports; welfare and debt advice; and support to community and third sector organisations to deliver dignified food access) have the potential to reduce the need for food banks if provided at the right scale and if delivered with the flexibility needed to meet the needs of local citizens.

However, current and anticipated increases in the cost of living through inflation and fuel costs, and increased levels of personal debt are significant challenges. Spending on food is often reduced by people/families when under financial pressure/debt so incomes need to be increased to a level where food and other essentials can be afforded.

As detailed in the answer to question 1, further consideration is needed to:

- Ensure that access to high quality welfare and debt advice is available in every community, in ways and in places that people trust
- Ensure benefits advice is of high quality, potentially only available from accredited providers – with implications for attracting, recruiting, training and retaining staff
- Explore ways to increase access to benefits advice, learning from the experience of remote support during the pandemic
- Ensure resourcing for community-based advice infrastructure is sustainable
- Provide income support for people experiencing in-work poverty (whose income is just above benefit/crisis funding eligibility levels)

## **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?**

The Council agrees that the further actions described (including a minimum income guarantee, increasing access to emergency financial assistance, money advice and holistic support services; better local collaboration among key stakeholders) are potentially helpful.

Alongside the comments highlighted in the answers given to question 1, however, the Council notes that

- Consideration of a minimum income guarantee should make specific references to the levels of income necessary to ensure that food poverty/the

need for food banks is eradicated, taking account of current inflation, increases in the cost of fuel and the cost of rent, and the cost of accessing a healthy balanced diet essential for long term health and wellbeing

- With regard to emergency assistance and local collaboration, the national plan should consider establishing national principles for emergency food provision, including choice, good nutrition, culturally appropriate food which meets dietary requirements, as well as means of providing support which maintain dignity and respect for citizens.
- With regard to proposed plans for piloting the use of shopping vouchers in place of food bank referrals, there is a need to ensure that vouchers can be spent in the local area in shops that provide suitable range, quality and value for money
- Similarly, the local response to food security needs to ensure that communities have access to affordable, good quality food – this spans accessible and affordable transport and links to the 20 minute neighbourhood agenda.

#### **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?**

As noted above, the following are crucial:

- Cost and availability of transport to access food on a regular basis
- Review of planning and placemaking approaches to ensure access to affordable food retailers or other providers within a 20 minute local neighbourhood
- Review of Free School Meals provision, including amending eligibility to take large families and young people in temporary accommodation into consideration, with the latter being considered for allocation as the default position, given the potentially limited cooking facilities available
- Considering the use of pre-paid debit cards (e.g. Go Henry card) to reduce stigma, extend choice and increase uptake, and
- Considering the introduction of free school meals as a universal entitlement.

#### **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?**

The four actions proposed would give a good range of evidence of progress:

- Continuing to measure food insecurity through the Scottish Health Survey and the Family Resources Survey
- Working with national food banks and with community food networks to monitor and understand wider impact
- Commissioning independent evaluation of activities funded to improve local referral pathways, from the perspectives of frontline practitioners and people seeking support

- Exploring the integration of food insecurity measurement in the evaluation of income-boosting measures like the Scottish Child Payment and through exploration of a Minimum Income Guarantee.

To have confidence that we are moving in the right direction, the Council would expect to see:

- Reductions in the number of people experiencing food insecurity (via the national surveys)
- A reduction in claims for SWF in general and in relation to food poverty
- Reductions in demand for emergency food from the perspectives of food banks and food networks (but noting that there may be hidden demand, ways to engage with wider community organisations to estimate underlying trends will be helpful)
- Clear referral pathways which are well understood and are based on dignity (and monitoring information which shows a reduction in demand and repeat demand from individuals/households)
- Feedback from families that the additional payments are helping to reduce food insecurity
- Improved uptake of entitlements such as free school meals, supported by an understanding of what strategies are effective
- Feedback from professional stakeholders (e.g. GPs, health visitors, teachers) on what actions are considered to be effective

The Council would also be keen for evidence from these evaluations to be widely shared to help understand any ongoing/new pressures and barriers (e.g. the increases in fuel costs) and what actions are considered to be effective.

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

The Edinburgh Poverty Commission noted that even with highly effective supports in place to prevent poverty, there will always be individuals who fall into crisis for unavoidable reasons and who need emergency support. The key aim for any plan should be to ensure that support is available and accessible when it is needed, that the support is provided in a way that is dignified and respectful, and that people are helped in a way that ensures their crisis is temporary and prevents future harm.

In doing so, it is important that the focus on ending the need for foodbanks does not become a question of semantics, with one form of support being replaced by a largely similar model. Future responses to urgent need for food should support people to move beyond the crisis.

The proposals include Scottish Government investing in cash-first local partnership work to make food banks the last port of call which will mean food banks, money advice services, local authority officers including those from the Scottish Welfare Fund and public health teams coming together to identify the best response for their local area and agreeing short, medium and long term actions to deliver it".

Clarification is needed of the level of funding which will be made available from the

Scottish Government to support a cash first approach etc and whether this will be new/additional funding. Fair, sustainable funding is needed to deliver all of the measures.

Finally, it should be noted that other policies under development by the Scottish Government have the potential to affect the way local partners work, and the capacity of local government to implement the vision outlined in this draft plan. In particular, the development and implementation of the National Care Service could bring significant disruption to local authorities and health boards, which will have implications for the capacity to engage in other strategic areas.