

Trussell Trust submission to the Scottish Government's Social Security Committee's Consultation on the Social Security (Scotland)

Bill



Background:

1. The Trussell Trust welcomes this consultation and the opportunity to submit evidence. We are an anti-poverty charity that runs a network of 53 foodbanks in Scotland that provide a minimum three days' worth of nutritionally-balanced emergency food and support to people in crisis. We work to tackle hunger in the UK by providing emergency food alongside addressing the underlying causes of hunger through signposting, co-locating services onsite through our More Than Food approach, and through advocating for policy change to reduce the need for referrals to foodbanks.

2. During the 2016-17 financial year, Trussell Trust foodbanks in Scotland provided 145,865 three day emergency food supplies to people in crisis. Of these, 47,955 went to children. Benefit delays and changes comprised 42% of all referrals to Trussell Trust foodbanks in Scotland¹ over that period.

3. We have feedback to contribute on aspects of the Bill that were not a focus of this consultation and would welcome the opportunity to share further feedback with the committee including via one of the oral evidence sessions.

Key Reflections on the Consultation:

- The future delivery of the benefits that are being transferred, including short-term assistance, are highly likely to impact on foodbank referral numbers. E.g.
 - Recent research has revealed that a large proportion of households who are referred to foodbanks in the Trussell Trust Foodbank Network have someone with a disability or health condition.
 - Research into fuel poverty in the network in Scotland has identified that fuel poverty is a significant issue for people referred to foodbanks.
 - Research among the network has highlighted the need for further action around short-term and emergency assistance.
- We welcome the fact that the Scottish Government intends to develop Regulations with external help because expert knowledge and evidence will help inform effective policy development that otherwise could lack sufficient scrutiny.
- We welcome the annual report on the Social Security Charter.
- We would be keen to hear more about the Scottish Government's plans for topping up 'reserved' benefits (those controlled by the UK Government), and for creating new benefits, which are not included in the Bill.
- We welcome the inclusion of 'short-term assistance' in this Bill but emphasise the need to increase accessibility and availability of this provision, to be accompanied by appropriate and affordable repayment.

Recommendations:

- To include an additional principle: The Scottish social security system should act as a safety net to prevent people falling into crisis and destitution.

¹ [Note: our figures are a measure of volume and need, not unique individuals helped. Our figures are the most complete and authoritative picture of emergency food provision across the UK, but do not account for clients helped by independent foodbanks]

- To ensure commitment to expert knowledge and evidence being used to inform effective policy development and scrutiny.
- To lay out more detail about plans for topping up 'reserved' benefits (those controlled by the UK Government), and for creating new benefits.
- Commitment to developing affordable repayment schemes alongside increased accessibility and availability of short-term assistance and clarity about future development of the Scottish Welfare Fund.

Foodbank Network Research Findings:

Profile of households

4. Research published by the University of Oxford, Kings College London, and The Trussell Trust in June 2017 which surveyed people referred to foodbanks across the UK, including Scotland, showed that a large proportion of people referred to foodbanks have a disability or long-term health condition and a large proportion are lone parents².
- Three-quarters of households using food banks contained someone with a long term health condition and/or disability.
 - Over 50% of households were classed as having a disability. This was based on responses to a question about how their health condition impacted their day-to-day activities, consistent with the definition used in national surveys.
 - 1/3 households were affected by mental health.
 - Compared to the profile of low-income households in the UK, the households of food bank users are almost three times more likely to contain someone with a disability.
 - Lone parents and their children constitute the largest number of people receiving help from food banks. Food bank users are predominantly made up of single, working-age adults without children, lone mothers with children, and families with three or more children.
 - Half of respondents had gone without heating, or more than four days in a given month and had been unable to afford essential toiletries, and/or had been unable to afford appropriate clothes for the weather
 - 28% of those who had experienced rising expenses said this was due to housing costs, such as rent or energy, going up. Tenants in private housing were more likely to find it difficult to keep up with rents than socially rented properties.
 - The average monthly income of the sample was £319.43 and 1 in 6 were in employment. About 16% of households reported having no income in the past month.

5. People referred to foodbanks could be eligible for the benefits being transferred in the Bill and their lives could be impacted by changes to delivery of the benefits. We would welcome more detail on plans for topping up reserved benefits and the creation of new benefits.

Fuel Poverty

6. Trussell Trust research into fuel poverty in the network in Scotland analysed data from almost 20% of the network in Scotland. 80% of these said they thought clients need help with paying their bills and all were unsure what support was offered through their local council. 20% said they were already providing some sort of fuel poverty alleviation initiative. Others provided: signposting to external services, prepayment meter top up and warm clothes.

Short-term and Emergency Assistance

7. Research conducted among Trussell Trust foodbanks in 2014 and 2016 highlighted that people were referred to foodbanks due to hitting a financial crisis, having exhausted all their usual coping mechanisms³. Findings have demonstrated that awareness of, access to, and monitoring of Short-term Benefit Advances needs to be improved. While some income is better than no income, it is also important that repayment plans are appropriate and take account of the individual's circumstances.

² https://www.trusselltrust.org/wp-content/uploads/sites/2/2017/07/OU_Report_final_01_08_online2.pdf p.81

³ <https://www.trusselltrust.org/wp-content/uploads/sites/2/2016/01/foodbank-report.pdf>

8. Additionally, the first part of the University of Oxford research on foodbank use identified a strong, dynamic link between JSA sanction rates and foodbank referrals⁴. We have called on the UK Government to introduce a yellow-card system approach to sanctioning. However, there has been little uptake around changes to the current system.

9. A report released earlier this year by The Trussell Trust found that foodbanks in areas of full Universal Credit (UC) rollout to single people, couples and families have seen a 16.85% average increase in referrals for emergency food, more than double the national average of 6.64%. As rollout continues, and as conditionality is extended to people who are in work, an increase in people falling into crisis is concerning. This could increase the numbers applying to/accessing funds such as short-term assistance, the Scottish Welfare Fund (SWF), and Budgeting Advances (the safety net under the safety net).

10. Foodbanks in the network have had mixed experiences of the Scottish Welfare Fund.

- West Lothian Foodbank has a close working partnership with the SWF in their area, which makes direct referrals to the foodbank. The referrals are often for individuals who have exhausted the use of the Fund (eg. three or more grants in a 12-month period). This ensures that people who are no longer eligible to be supported by the Fund, but who are still in need of crisis support, are not left to go hungry.
- Glenrothes Foodbank had a strong partnership with the Scottish Welfare Fund that drove foodbank use down by 31% due to the successful acquisition of crisis grants for those who most needed them. The Scottish Welfare Fund advisor would be situated within the foodbank one day per week and, of those referred by Glenrothes Foodbank, there was a 97% success rate for accessing those grants.
- North Lanarkshire Council developed a 'referral pathway' with the intention that those in need access the SWF as their first port of call. Those who are not eligible for the Fund are then referred to one of the local foodbanks registered with the pathway. Strong evidence provided by The Trussell Trust foodbank in Airdrie indicates that, in many cases, the pathway created a barrier and left a number of people without support.
- Edinburgh City Council introduced a similar scheme, whereby individuals could no longer receive a foodbank referral through The Advice Line but would instead be automatically transferred to the SWF. If ineligible for a crisis grant, the SWF would digitally refer the individual to the foodbank via email. Unfortunately the foodbank was not consulted on this procedural change and did not have the equipment to deal with it.

11. It will be important for the new social security system to consider any necessary alterations to short-term and emergency assistance provision (such as Budgeting Advances and the SWF) and their delivery alongside the roll-out of UC and reduction of the JCP estate⁵, as well as how it will interact with local agencies to ensure that everyone who is eligible for provision have awareness of and access to the relevant information and assistance.

Reflections on the Consultation's Priorities:

Regulations

12. We welcome the fact that the Scottish Government intends to develop regulations with external help because expert knowledge and evidence will help inform effective policy development. We support a person-focused and evidence-based approach to policy development. It would be useful to have more clarity on who would be consulted and whether this would include people receiving the relevant benefits in order that the Government may fully understand the complexities involved.

Principles

13. We would like to see the following principle included:

- The Scottish social security system should act as a safety net to prevent people falling into crisis and destitution.

⁴ <https://www.trusselltrust.org/wp-content/uploads/sites/2/2016/10/University-of-Oxford-foodbanks-sanctions.pdf>

⁵ For more information see our report into the impact of U.C. on foodbanks: <https://www.trusselltrust.org/wp-content/uploads/sites/2/2017/04/Early-Warnings-Universal-Credit-and-Foodbanks.pdf> p.12

14. Effective short-term assistance and emergency crisis assistance, such as the Scottish Welfare Fund, can play an essential role in ensuring people don't fall into a crisis or destitution.

Social Security Charter

15. We welcome the idea of the Social Security Charter and an annual report. It must be easily accessible and understood for those claiming benefits, to avoid any unnecessary confusion over eligibility or which could lead to withdrawal of benefits. The charter should be worded in such a way that it does not enhance the damaging 'scrounger' rhetoric, but instead reinforces the original purpose of social security as protection against destitution or the difficulties caused by an unexpected change in personal circumstances.

Designing the New System

16. We would like to hear more about how the Government will promote inclusion of opinion when designing the new system and how service users may be able to share their experience of engaging with the social security system to identify areas for improvement.

17. While aspiring for a system that is 'efficient and delivers value for money' it is important that learnings are taken into account from the evidence on the inefficient and in some cases harmful delivery of UC and other systems.

18. Processes should be transparent, easily understandable, fully explained, without a blanket approach and from the starting point that people are eligible for help, rather than being 'guilty until proven innocent'. This will help to preserve the dignity of individuals as is aspired to by the third of the proposed Scottish social security principles.

Conclusion:

19. Overall we welcome the committee's consultative approach to the Bill but want to draw the committee's attention to areas where more consultation with experts and service users is needed.

20. Changes to the delivery of benefits discussed in the Bill are likely to have an impact on foodbank referrals, due to a large proportion of people referred to foodbanks having a disability, a long term health condition, being a lone parent or being concerned about heating their homes.

21. Research among the Trussell Trust Foodbank Network has identified areas for improvement within the Social Security system, among benefits that are now being transferred and benefits that are still administered by Westminster. One example is the reduction in the waiting periods for receipt of assessment decisions and state support⁶. Research has also highlighted the need for greater accessibility to short-term assistance such as benefit advances and crisis fund provision to ensure that the social security system acts as a safety net to prevent people falling into crisis and destitution.

⁶ For more information see <https://www.trusselltrust.org/wp-content/uploads/sites/2/2017/04/Early-Warnings-Universal-Credit-and-Foodbanks.pdf> p.2