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Ending the need for food banks: consultation on a draft national plan - NSS response

Submitted via email: foodinsecurityteam@gov.scot

The National Secular Society is a not-for-profit, non-governmental organisation founded in 1866, funded by its members and by donations. We advocate for separation of religion and state and promote secularism as the best means of creating a society in which people of all religions and none can live together fairly and cohesively. We seek a diverse society where all are free to practise their faith, change it, or to have no faith at all. We uphold the universality of individual human rights, which should never be overridden on the grounds of religion, tradition or culture.

The NSS was founded over 150 years ago, and it campaigns on issues throughout the United Kingdom and occasionally abroad.

We are a democratic and independent non-profit organisation which receives no funding from government or other public bodies. Our campaigning is funded wholly by our members and supporters and is guided by our Secular Charter.

More information about our organisation can be found here:

<https://www.secularism.org.uk/about.html>

We welcome the Scottish Government's statement that its activities "are underpinned by a human rights approach" and that it aims to "strengthen the protection of human rights" in the consultation document. We agree that human rights should be central to any policy-making.

We are therefore concerned that some aspects of tackling poverty through foodbanks, debt advice or other services may not pay full regard to human rights where those services are delivered by organisations with a religious agenda.

Public services that are intended for the whole community, especially those funded by public money, should be provided in a secular context, open to all, without discriminating against anyone on grounds of religion or belief – either the people who are served or employed.

Many faith-based groups have demonstrated an ability to carry out public service provision without imposing their beliefs on service users or discriminating against users, employees or volunteers. Unfortunately, a significant number of religious groups unethically exploit their position as service providers to vulnerable people to advance their religion, or use dubious claims of "genuine occupational requirements" as an excuse to only hire workers or volunteers of a particular religion.

We urge the Scottish Government to ensure it only supports organisations that are genuinely inclusive of all, regardless of religion or belief, in tackling poverty.

Foodbanks and the Trussell Trust

The Scottish Government has said in its proposals that it will work with the Trussell Trust to support their foodbank transition and exit strategies. However, we are concerned that some members of the Trussell Trust network are engaging in unacceptable discrimination in their recruitment practices.

We urge the Scottish Government to raise this issue of discriminatory recruitment practices in its foodbank network with the Trussell Trust.

The Trussell Trust, which [says](#) it is “guided by Christian principles” also [states](#) that “equity, diversity and inclusion is central to our work”.

These are commendable values. However, the parent charity of the Trussell Trust only exerts limited control over its local foodbanks, which are generally run independently. As a result, some Trussell Trust foodbanks may engage in practices that are contrary to its stated values of “equity, diversity and inclusion”.

For example, in September Dundee Foodbank, which is a member of the Trussell Trust’s foodbank network, [advertised](#) for a warehouse job saying the successful candidate must have “Christian values” and “evidence a live connection with the church”.

In a country as increasingly irreligious and religiously-diverse as Scotland, it is highly inappropriate for an organisation delivering a service in partnership with a local authority, especially if it is in receipt of public funds, to restrict its employment or volunteering opportunities to members of a particular religion. Additionally, it may potentially be unlawful – the Equality Act 2010 only permits such discrimination where there is a demonstrable genuine occupational requirement for employees to have a particular religion or belief. It is unlikely that managing a warehouse demonstrates such a requirement.

If the Trussell Trust is unable to exert greater control over its network members to ensure this discrimination does not occur, the Scottish Government must consider the appropriateness of local authorities partnering with its foodbanks that are not truly committed to diversity, inclusion and equality – including among its employees and volunteers.

The same principles must apply to any organisation partnered with government to run a foodbank or otherwise tackle poverty, including independent foodbanks that are not Trussell Trust members.

Welfare and debt advice

We note that the consultation document states the Scottish Government will distribute over £7 million to providers of free debt advice. We are aware that in the past, the Scottish Government has funded debt advice charity Christians Against Poverty (CAP), and we are concerned that they may be included among the providers to receive this £7 million.

CAP is an evangelical organisation established with the dual charitable objects of relieving poverty and advancing the Christian faith. It has a poor reputation amongst professional debt advisers due to its ethically dubious practices. Its service is based around volunteers visiting service users in their homes. A particular concern is that the volunteers invite vulnerable clients to pray. It also invites some clients along to 'discovery breaks' – short holidays where they can 'learn more about the Christian faith'.

Advice UK, the national charity which supports independent advice services, terminated CAP’s membership in 2011 when it judged the ‘emotional fee’ of asking clients to pray whilst offering debt advice to be incompatible with membership.

We note that in the “Targeting and equalities” section of the consultation government, the Scottish Government has identified “asylum seekers”, “younger people”, “minority ethnic households” and “younger parents” as groups at higher risk of experiencing financial insecurity. All of these groups are less likely than the general population to be Christian. These groups are therefore far more likely to feel alienated and distressed at being pressured into prayer by debt advisors.

CAP also has a [policy](#) of only recruiting Christians, which appears to be applied to all roles regardless of the duties involved.

In 2020 we wrote to Cabinet Secretary for Communities and Local Government Aileen Campbell expressing these concerns regarding the Scottish Government’s decision to fund CAP. The response we received on 17 December 2020 did not reassure us that the Scottish Government will address these concerns, and said “Christians Against Poverty is well-placed to undertake this debt advice provision project.” **We urge the Scottish Government to reconsider its position and place greater requirements on recipients of public funds to ensure they do not proselytise and do not apply religion-based discrimination in their recruitment policies.**

Social action by faith-based organisations clearly contributes enormously to the welfare of Scottish society. However, where religious organisations join others in delivering publicly funded services, we believe it is reasonable to require them to respect boundaries and refrain from proselytising or discriminating against service users or their employees.

We therefore sincerely hope the Scottish Government will proactively address the issues raised here when working with foodbanks, debt advice providers and any other community service provider to eliminate poverty, to ensure all members of the public are treated with fairness and dignity regardless of religion or belief.