

Consultation – Proposals for Healthy Eating in Schools Measure

Response from Estyn

1. Do you think that the proposed Measure will promote a holistic “all school” approach to healthy eating? Are there any additional powers that could be included in the Measure to further promote this approach in schools?

Specific judgements about how well schools in Wales currently enable and encourage learners to be healthy are contained in Estyn’s report ‘Food and Fitness: A report on how well schools in Wales support children and young people to be healthy and active’. This report, which makes recommendations to schools, local authorities and the Welsh Assembly Government, is due to be published shortly and has been seen by officers in the Health Improvement Division and Additional Needs and Inclusion Division at the Welsh Assembly Government. Advice on Estyn’s role specifically in relation to school meals was provided in the report ‘School meals: advice on the role of inspection in monitoring school meal standards’ in 2006.

Overall, the proposed measure would help to address the relevant issues highlighted by Estyn in its reports referred to above. There are a range of matters that need to be considered in particular and these are detailed in the responses to the questions that follow.

2. The proposed Measure provides for Regulations which will specify nutritional standards to be introduced by Welsh Ministers. Do you think that this incremental approach will ensure that children, young people and parents are not alienated by the speed of the reforms?

Estyn’s ‘Food and Fitness’ report makes a number of recommendations as detailed below.

Schools should:

- R1 review their lunch time arrangements to ensure that they support healthy living;
- R2 plan and set targets to increase the take-up of free school meals;
- R3 plan to meet the new nutrient, food and drink standards in the Appetite for Life Action Plan¹;

¹ <http://wales.gov.uk/docrepos/40382/403829/1822473/appetiteforlifeactionplane?lang=en>

- R4 improve the coordination of healthy living work across the curriculum, provide more opportunities for pupils to learn how to prepare food and use a consistent approach to teaching what makes a balanced diet;
- R5 provide pupils with the recommended minimum amount of physical education and offer pupils a wider range of physical activities;
- R6 ensure that toilets and changing facilities meet appropriate minimum standards; and
- R7 evaluate the effectiveness of their actions to improve pupils' health.

The Welsh Assembly Government should work with schools and local authorities to:

- R8 ensure that all schools meet the new nutrient, food and drink standards in the Appetite for Life Action Plan as soon as is practicably possible and set a target date for this;
- R9 fund improvements to catering and dining facilities and facilities for teaching pupils how to prepare and cook food;
- R10 introduce minimum standards for school toilets and changing facilities; and
- R11 provide guidance for schools on how to evaluate the effectiveness of their actions to improve pupils' health.

Recommendations and 8 are particularly relevant as Estyn recommends that the current Welsh Assembly Government proposal set out in the Appetite for Life Action Plan do not go far enough in that it does not require all schools to meet the new nutrient, food and drink standards and it does not set a target date by which this would happen either.

However, the Welsh Assembly Government also needs to take account of recommendation 9 as the facilities in some schools must be improved in order for the provision for children and young people to improve. Estyn's report made the following comment.

Many schools have kitchens that require investment in new facilities. A few schools do not have kitchens on site and meals are prepared elsewhere and transported to the school; the delay between food being cooked and food being served results in meals that are less appealing for pupils.

With regard to the suggestion that children, young people and parents could be alienated by the speed of the reforms, Estyn's 'Food and Fitness' report found that children, young people and parents are generally very supportive of moves to encourage healthy living in schools, as the following excerpts note.

Most pupils (and their parents) that have to pay for school meals are prepared to pay more for better-quality, healthier food and a pleasant dining experience.

Most schools choose not to suggest to parents what is or is not allowed in packed lunches brought from home. However, the few schools that have tried to limit the content of packed lunches have done so sensitively and successfully as the average packed lunch in these schools was healthier than in other schools.

Almost all parents cooperate when schools work in partnership with them to address health issues. The most successful schools communicate regularly with parents through letters, meetings and special events and consult with them before making any significant changes to policy. This ensures that there is a shared understanding about the school's approach. Only a very few parents have objected to requests for pupils not to bring chocolate, sweets, crisps or sugared drinks to school on the grounds of 'civil rights'.

Furthermore, implicit within the first and second recommendations for schools is the need for careful consideration of the impact of allowing pupils in secondary schools off site during the lunch hour. Estyn's report notes:

Pupils who are allowed off-site often buy food in local shops and cafes, which can be cheaper than but not as nutritious as food in school. Pupils who are eligible for free school meals often do not take up their free meal if they are allowed off-site, because they wish to be with their friends.

It is not simply the food and drink provision that determines whether children, young people and parents will be alienated or not. The overall quality of the dining experience is important. Estyn's report indicates that pupils are more likely to have a school meal where:

- food is freshly prepared;
- queues are not too long;
- the dinner break is long enough;
- the dining hall is attractive, warm and clean and not overcrowded or noisy;
- there are small tables and individual chairs rather than long tables with fixed seats;
- food is served on individual plates and bowls rather than on all-in-one trays; and
- members of staff dine at tables with pupils.

There are examples of good practice in Wales where secondary schools have already made significant moves to ban unhealthy food and improve the overall quality of the dining experience. Three of these examples are included in Estyn's report and are repeated below for convenience.

Case study: Sensitive approaches to changing meals in a secondary school

The catering manager in a secondary school has overseen the transformation of the school's catering facility. Over a three-year period she made many small adjustments to the salt, sugar and fat content of the meals without the pupils noticing. Less healthy options such as pastry-based snacks have been removed from the menu one at a time and replaced with healthier alternatives.

During this period, the number of pupils choosing to have a school meal has steadily increased.

The school canteen has recently received a Gold Healthy Options Award².

Case study: High quality 'food court' in a large secondary school

A secondary school has worked in partnership with a private catering firm to create a high quality 'food court' catering facility. A cashless system means that all pupils use a personal payment card.

A wide range of good quality meals are available at very competitive prices. In addition to the hot meal of the day (meat and vegetarian options) there is a salad bar, fresh fruit salad bar, baguette bar, jacket potato counter, sandwiches and an extensive range of fruit juices, water and hot drinks.

Most of the items available are sourced locally and have been adapted to healthier options through the reduction in sugar, salt and fat content. Chicken and beef burgers use locally-sourced meat that often comes from one of the pupils' home farms.

Since the introduction of the food court, the school has seen a significant increase in the number of students using the facility. Over 700 students are served at both break and lunch time. Significantly, before the changes only 60 of the 117 eligible pupils were taking their free school meal but now 114 pupils take it.

Case study: Developing a healthier school meals service in a secondary school

This new school has developed a comprehensive catering service using a private company who have a service-level agreement with the LEA. The general manager of catering is responsible for the catering needs of the whole campus – crèche, primary school, secondary school and the lifelong-learning centre.

² This award is part of a pilot Scheme run by the Chartered Institute of Environmental Health (CIEH) in 2007 – 2008 and will be available more widely in the future.

The manager is following the proposals in Appetite for Life proactively. Food in the canteen is very clearly labelled explaining dietary need and food groups. Large colourful posters promote healthy choices. For example, calcium products were shown on charts with information about why boys and girls need calcium.

A very good selection of fresh salad and fruit is always available. Most of the food available is low in fat, sugar and salt. Healthy pasta dishes are proving popular with pupils. Free tasting sessions are held to encourage pupils to try new healthy foods. The canteen uses local products as far as possible including local dairy products, Welsh beef, fresh vegetables and fruit.

The school holds regular meetings for parents to explain what is available in the canteen. There is a healthy-eating forum for parents, pupils and staff to discuss issues to do with food and drink in the school. The local authority's dietician usually attends these meetings to support the school and answer parents' questions. The school council feeds back to the catering manager once a month the views of pupils about the food and drink available and the service provided.

Overall, the continued participation of pupils and parents in developing the catering service coupled with the enthusiasm and attention to detail provided by the catering manager means that pupils in this school have an excellent facility.

3. Are there any additional powers which should be added to the proposed Measure that would further improve healthy eating in schools?

Please refer to the recommendations from 'Food and Fitness' included in the answer to question 2 above.

4. Does the proposed Measure promote satisfactorily the principles of sustainable development in the provision of healthy school food?

Section 3c of the proposed Measure states:

In this Measure "healthy eating" means eating (and drinking) food (and drink) whose nature, quality and quantity cause as little damage as is reasonably possible to the environment during the course of its production, processing and distribution.

This definition would benefit from further clarification and exemplification. For example, as part of the procurement process, how important is it that schools and local authorities consider whether or not products have been fairly traded? Is there a conflict between the promotion of fair trade foods and the reduction of food miles? How important is it that schools and local authorities consider whether or not foods are organic? The statement is aspirational but ambiguous and open to interpretation and may, therefore, not satisfactorily

promote principles of sustainable development. So long as sufficient guidance for schools and local authorities on matters relating to sustainable development is provided, the statement in Section 3c of the Measure may be satisfactory.

5. Do you agree with the duties, responsibilities and reporting requirements proposed in the Measure for head teachers and governors? Will these requirements ensure that progress is made on improving healthy eating in schools?

Most schools already communicate regularly with parents about the promotion of healthy eating, so the additional requirement for headteachers is not onerous. It may be useful to require a section about healthy eating to be included within the Governors' Annual Report.

6. Do you think that the duties, responsibilities and reporting requirements proposed for Assembly Ministers, Local Education Authorities and the Chief Inspector of Schools are sufficient to have a positive impact on the implementation and monitoring of healthy eating in schools?

The duties, responsibilities and reporting requirements proposed will improve the implementation and monitoring of healthy eating in schools.

There is currently a requirement for Estyn to report on 'whether the school has arrangements that encourage and enable learners to be healthy'. Estyn's 'Supplementary guidance on inspecting healthy living (including physical activity and food and drink)', May 2007, advises inspectors to consider the following questions in making judgement on standards in relation to healthy living:

- Does the school have a policy related to healthy living? What elements of healthy living are included in the policy?
- Does the policy have a beneficial effect on practice?
- Does the school encourage healthy eating and drinking?
- Does the school monitor the provision for school meals in supporting school policy?
- Is the school engaged in initiatives that promote healthy living?
- Do community focused schools have appropriate arrangements for ensuring that partners encourage and support healthy living?

Inspectors currently take a broad view when making a judgement about healthy living. They are not required to comment specifically on the nutritional value of food and drink available to, or consumed by, pupils. In order to make a fully informed judgement about nutrition, inspection teams would need to include an additional inspector with appropriate qualifications and expertise in this area.

This inspector would need to consider the range of food and drink available to, or consumed by, pupils including, as applicable:

- breakfast provision;
- tuck shop / snack provision;
- school meal provision;
- provision of milk;
- provision of free drinking water;
- provision through vending machines;
- provision for out-of-school-hours activities; and
- arrangements for provision of food and drink for off-site activities.

In order to make a judgement, the inspector would need to:

- interview a representative sample of pupils;
- interview catering staff;
- observe breakfast, break time and lunch time activities;
- reviewing menus for breakfast, snacks and school lunches against the relevant standards;
- review the content of vending machines against the relevant standards; and
- inspect relevant documentation such as policies, communications with parents and data about food and drink sales.

The nutrition inspector's judgement would be noted as part of the comments made about healthy living within key question 4 of the inspection report. A separate report could be provided alongside the main inspection report that provides detailed feedback to the school in a standard form.

7. There will be a financial cost as a result of the proposals in the Measure on the Welsh Assembly Government, Local Education Authorities, schools and to a lesser extent on Estyn. Will these proposals result in your organisation incurring financial costs, and if yes, what will these costs be? (please quantify).

At present, Section 28 inspection teams do not include a dedicated inspector to consider nutrition. However, this would be necessary in order to carry out effectively the additional function of the Chief Inspector of Schools outlined in section 5 of the proposed measure.

This will incur an additional, significant cost to every Section 28 inspection.

The calculations following are based on the experience of HMIE in Scotland where Nutrition Associate Assessors join their inspection teams for similar purposes. The cost would depend on the sample of inspections that would include a nutritionist. In Scotland, a nutritionist is used on some 25% of primary school inspections and some 75% of secondary school inspections. The time needed is about a day and a half for each primary school (a day inspecting and half a day for preparation and writing) and two days for secondary (a day and a half inspecting and a day preparation and writing). Hence, the total cost for us to follow the Scottish model (assuming staffing

cost of £500 a day estimated for us by the Food Standards Agency Wales) would be around **£100,000** a year ($25\% \times 240$ (primary) $\times 1.5 \times £500 + 75\% \times 60$ (secondary and special) $\times 2.5 \times £500$). Including a nutritionist on all inspections would cost around **£250,000** a year ($240 \times 1.5 \times £500 + 60 \times 2.5 \times £500$). These estimates do not include additional administrative costs, costs associated with training and monitoring or set-up costs for this new work.

HMIE in Scotland found that there was not a big enough pool of suitable freelance nutritionists. Sufficient nutritionists had to be employed by HMIE, on a short-term contractual basis initially, to fulfil the requirements.