



Welsh Assembly Government: Consultation Healthy Eating Measure

The British Dietetic Association would like to thank you for the opportunity to comment on the Welsh Assembly Governments: Consultation Healthy Eating Measure.

The British Dietetic Association, founded in 1936, is the professional association for registered dietitians in Great Britain and Northern Ireland. It is the nation's largest organisation of food and nutrition professionals with over 6,000 members.

Registered dietitians are the only qualified health professionals that assess, diagnose and treat diet and nutrition problems at an individual and wider public health level. Uniquely, dietitians use the most up to date public health and scientific research on food, health and disease, which they translate into practical guidance to enable people to make appropriate lifestyle and food choices.

Dietitians are the only nutrition professionals to be statutorily regulated, and governed by an ethical code, to ensure that they always work to the highest standard. Dietitians work in the NHS, private practice, industry, education, research, sport, media, public relations, publishing, NGOs and government. Their advice influences food and health policy across the spectrum from government, local communities and individuals.

We welcome the proposed measure and the fact that this will build on and enhance the existing relevant legislation and guidance related to the promotion of healthier eating in schools.

It is important that a consistent message is conveyed across the educational system with regards to the promotion of good nutrition.

Dietitians are key experts in the development of public health nutrition policy and implementation of national and local initiatives. In many areas dietitians are leading partnership work on the whole school approach to food and health.

There is an important role for dietitians at both a local level and at a strategic level and to work with all facets of the whole school approach to food and nutrition:

- Interpretation of standards requires a dietitian's professional expertise for implementation.

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INVESTOR IN PEOPLE

- Working with catering services on school meal provision.
- Developing innovative and accredited training methods on food and nutrition skills for key personnel.
- Facilitating the development of School Nutrition Action Groups (SNAGs). The SNAGS are an excellent vehicle for involving and empowering pupils in achieving change for themselves.
- Dietitians provide expertise and guidance to healthy schools schemes and partner organisations.
- Community Dietitians currently working with schools across Wales can provide evidence of good practice of pioneering food and nutrition based initiatives and programmes which demonstrate a whole school approach to food and health.

It is important that these rapidly developing roles for dietitians are taken into consideration.

Please find below our responses to the consultation questions.

I would be grateful if you could provide me with any feedback to this consultation and inform me of any further consultations. We would also be prepared to give oral evidence to a future committee.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Nicola Morris', written over a large, hand-drawn circular scribble. A vertical red line is positioned to the right of the signature.

Nicola Morris
On behalf of Bwrdd Cymru BDA

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?

While in principle the intention is good, further clarification is required as to how this will be achieved.

An ‘All School’ approach needs to encompass the wider school community and all partner organisations that work with schools. It currently puts the onus on heads which is key, but implementation of measures to improve the uptake of healthier food choices through a whole school approach needs to be carried out in conjunction with others in a partnership approach, the key partners being pupils. If this doesn’t happen the danger is it will be dictated by Heads in a top down approach.

An ‘All school’ approach should include development of the curriculum to incorporate knowledge and skills, effective methods of nutrition education, provision of healthier choices, marketing and promotion and inclusion of the wider school environment.

Providing healthier options alone will not necessarily guarantee the uptake - it needs to be about informed choice. The inclusion of OCN (Open College Network) level 2 Food and Nutrition Skills courses and OCN level 1 Practical Cooking Skills courses within the school curriculum would benefit pupils and staff.

The Measure says it will address ‘more than just food eaten in schools’ however, it is not clear how? Legislation must take account of all school food but must be supported with resources/information to enable parents and pupils to make healthier choices. It needs to include packed lunch policies with nutritional specifications similar to school meal specifications and systems for how schools are enforcing them.

- What about food sold immediately outside the school grounds? And also food brought in to school from home?
- How will the measure underpin actions outlined within ‘Appetite for Life’?
- It is assumed that these proposals will be based on the nutrient standards in ‘Appetite for Life’?

Section 7 (2) (d) artificial additives. Artificial additives are not included in the ‘Appetite for Life’ food or nutrient standards. Maximum amounts of artificial additives will need to be added. The ability to include foods or drinks which use artificial sweeteners, as a choice, should not be excluded.

- There will need to be some consideration of the full spectrum of children and young people in schools including those that have particular nutrition requirements, are underweight, those with limited food preferences, cultural requirement, special needs etc.
- Consideration will also need to be given as to how the 'healthier eating' message is conveyed, i.e. less emphasis on the banning of food and more emphasis on the importance of eating a balanced, varied diet, and eating more of foods from particular food groups, e.g. fruit and vegetables.
- Also less emphasis should be given to the term healthy eating which can have negative connotations.

Other suggested additions:

- Requirement for schools to have food and fitness policies (Appetite for Life just recommends but does not require).
- A requirement to protect the school lunchtime and make the lunchtime a key part of the school day – to achieve the proposals outlined requires time, resources and skills for catering services and their staff. It shouldn't be seen as legislation for heads in isolation, but working in partnership with catering and health to achieve the measures.
- Include regulations for providing a dining room environment (together with appropriate kitchen facilities) that is conducive to healthier eating, and is a social focus and with minimal queues.
- A requirement for LAs to provide appropriate accredited staff training on food and health and promoting uptake of healthier choices (as in Appetite for Life). This could, for example, involve encouraging teachers or Heads to nominate teachers to undertake OCN (Open College Network) level 2 Food and Nutrition Skills courses (created, designed and delivered by Community Dietitians and funded by WAG) as part of their induction /inset training.
- What about training of lunchtime supervisors employed separately by individual schools?

- Incorporate activity as well as healthier eating. The availability of a range of activities within the school day would enhance the children's experience and could contribute positively to behaviour management as well as energy balance. Physical activity provision could also be considered to align with current Welsh Assembly Government policy on joining up food and fitness initiatives.
- The establishment of School Nutrition Action Groups with representation from School governors, pupils, school catering, a community dietitian, teaching staff, parents would support the availability, promotion and provision of healthier food in schools.
- The measure should make reference to the importance of involving children and young people as partners of change.
- Integration of food and nutrition activity within extracurricular programmes and out of hours learning e.g. promotion of OCN (Open College Network) level 2 Food and Nutrition Skills courses and OCN level 1 Practical Cooking Skills courses, WAG funded Cymru Cooks.
- The measure should encourage the linking of feeder primary schools with secondary schools through food based activity e.g. practical cooking workshops, peer led food and nutrition workshops managed and delivered by trained secondary school pupils to primary school pupils.

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?

While this is a good idea, it is important to have specific and realistic time frames to work towards to ensure that things happen. This should coincide with 'Appetite for Life' (i.e. from September 2008 action research project will test and implement standards over 2 years).

In addition to this, appropriate education, marketing and engagement with children, young people, parents, governing bodies, catering staff (in providing information, undertaking consultations, collating opinions and giving feedback) is critical.

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

- Requirement for schools to have food and fitness policies (Appetite for Life just recommends but does not require).
- A requirement to protect the school lunchtime and make the lunchtime a key part of the school day – to achieve the sort of proposals outlined requires time, resources and skills for catering services and their staff. It shouldn't be seen as legislation for heads in isolation, but working in partnership with catering and health to achieve the measures.
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4) Does the proposed Measure promote satisfactorily the principles of sustainable development in the provision of healthy school food?

The measure proposes increased regulation/legislation around the promotion/provision of healthier eating in schools which should help ensure that the school environment continues to provide and promote healthy nutrition to future generations.

The definition for 'healthier eating', rather than say (c) cause as little damage..... to the environment during production, processing or distribution..... should instead refer to 'healthy sustainably produced'.

The definition of healthier eating should be widened to include the terms sustainable production and distribution.

If using 'local' this needs to be defined as locally produced and /or locally supplied.

Local procurement should be the aim and be supported where available and achievable within financial constraints. It is important however, to match this aspiration with providing a range and variety of foods which both meet the nutrition standards and are accepted by the children in schools.

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?

Heads and Governors should be required to report their progress on improving healthier eating. Further clarity however, is required regarding the reporting responsibility for Governors.

How will heads be held accountable? What are the repercussions if they do not comply? These need to be considered as well as who will deal with this.

Consultation is needed with teachers/governors and families to discuss practicalities around method, delivery and content of reporting, particularly in agreeing the most effective and time-efficient method for communicating to parents. Families should be engaged with rather than reported to. This should not be a tick box exercise.

Consideration also does need to be given to Head Teachers current workloads and reporting requirements, whether it is necessary for them to report to all 4 parties listed (LEA, The Governing Body, parents and the general public) and whether there may be a role for the Welsh Assembly Government in reporting to the wider general public.

6) Do you think that the duties, responsibilities and reporting requirements proposed for Assembly Members, 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?

As above, what will be the repercussions for non-compliance. These need to be communicated and who would deal with these agreed. Could these be financial?

Regarding Chief Inspectors, there will need to be some agreement regarding how the information is collected and recorded to ensure consistency and validity across Wales.

Under section 5(ii) 'appears to have resulted in an increase in healthy eating in those schools'. How will this be measured? Will there be guidelines as to how to measure an 'increase in healthy eating'. Would this be increased promotion or uptake. The latter would require more intensive monitoring.

Further clarity is needed with regard to some of the statements, i.e. 'The Welsh Ministers to exercise their functions'. What does 'functions' mean here?

Dietitians have an important role to play in this and Ministers need to be expertly briefed and advised by such nutrition experts around the content aspects of the regulations.

LEAs are also likely to require advice and support from Community Dietitians in fulfilling their duties.

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 organization incurring financial costs, and if yes, what will these costs be?

There is an important role for dietitians at both local level and central level and to work with all facets of the school community and their partners. The extent of this will need to be estimated to ensure specialist nutrition and dietetic resources and expertise are available through additional core funding

Other Comments

We support the promotion of increased uptake of free school meals. The stigma of free school meals needs to be reduced. Consideration could be given as to whether this stigma may be reduced if meals were free for all children?

In the long term healthier children and young people would place less of a financial burden on the NHS.