



To: Ms. Kirsty Williams AM,
Committee Chair,
National Assembly for Wales,
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Gofynnwch Am: Mike Keating
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Dyddiad: 20th June 2008
Date:

Dear Ms. Williams,

Re: Healthy Eating in Schools (Wales) Measure 2008

In response to the consultation document and your letter dated 16th May 2008. As the Director of Education and Lifelong Learning for Rhondda Cynon Taf County Borough Council I am writing from the Local Education Authority perspective to the questions in your recent communication.

1. **Is there a need for an Assembly Measure to promote healthy eating in schools in view of existing initiatives within this policy area?**

The statutory nutritional standards required for school lunches are laid down in the Education (Nutritional Standards for School Lunches (Wales) Regulations 2001. In addition the guidance documents provided by the Welsh Assembly Government provide advice for school governors, head teachers and caterers on the statutory standards required for school lunches. On this basis our current in house meal providers and our three 'opted out' secondary schools are meeting the required standards.

We are familiar with the background and were involved in the consultation documentation sent by the Food in Schools Working Group that the Welsh Assembly Government formed to address the food and nutritional standards in Wales.

We are also aware that the Appetite for Life Action Plan encompasses the majority of the areas outlined in the Measure and that Catering Direct, the in house catering team for this Authority has embraced the plan and is already working with our schools to implement the actions. However, enforcement as outlined in the Measure will detract from the cross departmental working that is actively encouraged by the LEA.

This authority has largest number of schools in Wales and it has to be appreciated that the changes in our schools will take time. In this context, a measure of this nature, with enforcement, will not be particularly constructive or helpful at this time.

2. **Do you support the key provisions set out in the proposed Measure,**

i.e.

- ***The duty of Welsh Ministers, governing bodies, head teachers and local education authorities to promote healthy eating in schools***
- ***Healthy eating should be part of an inspection regime and includes reporting requirements on Welsh Ministers, the Chief Inspector of Education and training in Wales and governing bodies***
- ***Power of Welsh Ministers to specify maximum levels of salt, sugar and artificial additives in food and drink provided for pupils on school premises***
- ***Encouraging take up of school meals and protection of identity of those who receive them; and***
- ***The duty on local education authorities to ensure availability of drinking water for pupils***

This authority supports the key provisions in principle as they are broadly similar to those outlined in the Appetite for Life Action Plan. The key difference is that the time frame for the Appetite for Life Action Plan provides a period to "try and test" the actions to ensure that they are workable prior to regulation. There will therefore be a requirement as part of this process to engage with school colleagues so they are aware of the duty and the impact this may have during the school working day.

At present, head teachers and teaching staff have to deal with many initiatives and priorities for the children and young people in our schools. Our previous experience shows that the "carrot and stick" approach does not necessarily address issues. It is far more meaningful to have schools engage in the process in a willing manner and work with the children and young people through the School Council frameworks and School Nutrition Action Groups (SNAG).

3. **What are the practical implications of putting these provisions in place?**

The practical implications are clearly the amount of financial resources which would be required by this authority for implementation.

One third of our primary schools (approximately 43 schools) do not have a kitchen. There is therefore a major funding issue as substantial financial resources will be required from the Welsh Assembly Government to provide kitchens and equipment in these schools.

These considerations would also apply to the provision of drinking water in our schools. Cost implications have already been raised regarding this area as there will be a requirement to involve public health colleagues to check and analyse the water to ensure it is safe and free from harmful bacteria to safeguard our young people.

Depending on the individual school budget, there is, at present, a differential ability for schools to meet financial demands. Consequently the cost of the enforcement as outlined in the measure could be put to better use by providing additional funds for either the schools or the catering service to enable them to address healthy eating.

In addition, more investment is clearly needed to address the cost of the food required to meet the requirement and staff hours will need to be increased in kitchens to "home" produce the meals from scratch.

4. **Are there further provisions that you would like to see added to the proposed Assembly Measure?**

Healthy schools and healthy pupils are clearly an essential element of pupil achievement and that in this authority we regard the school meal as an integral part of the school day achievement.

In many of our schools, teachers and kitchen staff work together to encourage healthy choices at lunch time. Much time and resources are currently utilised in our schools in relation to recording free and paid meals separately, following up outstanding payments for meals from parents and paperwork relating to cash collection. Together with the cost of an external company to collect and bank the cash on our behalf, this amounts to a significant cost to this authority.

As many of our communities in Rhondda Cynon Taf are in areas of high deprivation, there are obvious concerns about the gap between those pupils whose families fall in the category of being entitled to free meals and how many of the children and young people use this entitlement. We regularly report this information to our Members.

We would therefore wish to formally raise the question as to the consideration by WAG of providing free school meals to all pupils.

There are pilot studies currently on going in Scotland and there is evidence from one authority in England that providing free school meals does increase uptake which was followed by a change in policy so when the same parents were charged for meals the uptake decreased.

Notwithstanding that there would be administrative and cash collection savings in schools throughout Wales, it is appreciated that this would require financial investment. However the savings made in health care budgets in the future could outweigh the short term cost implications. Overall, this could ensure that every pupil is treated equally with the same chance for a healthier diet and future life.

5. **Do you think the proposed Assembly Measure will achieve its overall purpose and aim, i.e. to enable a holistic, comprehensive "made in Wales" policy on nutrition in schools to be developed and implemented?**

It has to be recognised by all interested parties that the targets to improve the health of our children and young people will not be achieved overnight. The current eating habits and food culture in Wales will take time and we estimate that implementation will take at least one generation of school aged children (15 – 20 years) to achieve.

It is for this reason, and in recognition of the step changes needed, we would support a gradual process involving pupils and stakeholders. In the current climate, imposing more radical regulatory changes is unlikely to bring about the major improvements we would all wish to see in the school meal consumption by the children and young people in Wales. Potentially there could be further confusion and the associated waste of food that will not help meet the aims and targets of improving the health and reduce the levels of obesity in Wales.

I would like to thank the National Assembly for Wales for the opportunity for the involvement in the consultation process for the Measure and would be pleased to discuss any parts of the response if required.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. R. Keating', with a horizontal line underneath.

Mike Keating
Director
of Education and Lifelong Learning