

British Dietetic Association Welsh Board

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Consultation HES Committee

The British Dietetic Association would like to thank you for the opportunity to comment on the 'Consultation HES Committee'

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.

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.

Translating national policy guidance into local policy development and implementation

Working with catering services on school meal provision and training of staff.

Developing innovative and accredited training methods on food and nutrition skills for key personnel and the curriculum.

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 organizations on implementing food and nutrition initiatives.

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 and the resources made available to dietitians to support delivery in this area.

Please find below our comments on the changes that have been made to the proposals and 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.

Yours sincerely



Nicola Morris

On behalf of Bwrdd Cymru BDA

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

The principle of a Measure that will build on and enhance the existing relevant legislation and guidance related to the promotion of healthier eating in schools is to be welcomed. There is concern however, that the scope of the Measure is too narrow to achieve a whole school approach:

An 'All school' approach needs to encompass the wider school community and all partner organisations that work with schools.

Many local authorities and health partnerships are now developing joint food and fitness policies and this is a recommendation through Welsh Assembly Government, Food and Fitness - Promoting healthy eating and physical activity for children and young people in Wales (2006), a 5 year implementation plan for children and young people. Some 'Appetite for Life' implementation groups are looking at both. It would be a backwards step to look at food/healthy eating in isolation. There is encouragement through the healthy schools scheme and Welsh Assembly Government grants to increase activities to promote food and fitness.

If the measure is solely for food sold on the school premises, and is not 'fully holistic', pupils will bring in their own 'unhealthy choices' or purchase outside.

The inclusion of other premises needs to be clarified as this may have a big impact on increasing extra curricula activities, out of hours learning, after school clubs, community focused schools and activities set up by schools in local authority leisure centres.

It is unclear how this will link to 'Appetite for Life' and other existing initiatives within this policy area which is important if it is going to build on and enhance these. It says that some of the recommendations in 'Appetite for Life' will be encompassed in the measure. Further clarity is required.

If there is no reference to locally produced or locally sourced food will this undermine any guidance that may be included in the The Quality of Food action plan later this year. 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.

The definition of the word healthy eating needs to include 'balanced, affordable, nutritious and sustainably produced'.

Do you support the key provisions set out in the proposed Measure i.e

The duty on Welsh Ministers, governing bodies, head teachers and local education authorities to promote healthy eating in schools

Agree. What will be the repercussions for non-compliance? These need to be considered as well as who will deal with this.

The change in section 4 - placing a duty on governing bodies to report on healthy eating in schools as part of the current annual report by the governing body is to be welcomed. However, the method of reporting needs to be clear as will how an 'increase in healthy eating' will be measured.

The burden on head teachers has not been fully addressed. The level of support required and cost implications needs to be determined in order for the Measure to work. There will need to be assurance that funds are not diverted from other educational budgets

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.

Healthy eating should be part of the inspection regime and includes reporting requirements on Welsh Ministers, the Chief Inspector of Education and training in Wales and governing bodies

It is important to include all aspects of school food as part of Estyn inspection if it is to become integral to the school. This will need to include not only school meal standards, but also changes to the curricula, other aspects of school meals and school food policy attainment.

There will need to be agreement regarding how the information is collected and recorded to ensure consistency and validity across Wales.

Power of Welsh Ministers to specify nutritional standards, including the requirement to specify maximum levels of salt, sugar and artificial additives in food and drink provided for pupils on school premises

The inclusion of a new duty to 'take steps to ascertain the views of pupils before making regulations on the nutritional requirements of food in schools and to consult such other persons as they consider appropriate'(Section 7(12)) is welcomed. 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.

It is assumed that the standards will be based on the nutrient standards in 'Appetite for Life'?

There is some uncertainty in relation to the inclusion of artificial additives.

Encouraging take up of school meals and protection of identity of those who receive them

We support the promotion of increased uptake of free school meals. However, the stigma associated with free school meals needs to be addressed.

The duty on local education authorities to ensure availability of drinking water for pupils

This must be free, with appropriate access within school and plentiful - not from drinking fountains.

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

Local Authorities do not currently have the necessary nutritional/health expertise to interpret guidance and advice or resources to implement such a Measure by themselves and the Measure does not reflect the partnership approach to achieving change.

Schools and catering services will not be able to adhere to this Measure by themselves and will require a great deal of support both financial and expert advice.

Local Authorities will need expert guidance on purchasing suitable products.

The implications for existing contracts is great if tenders are mid way through when the Measure is statutory.

Current design and technology teachers do not necessarily have the expertise to deliver increased food and nutrition in the curriculum and teacher training will need to be addressed. Local Authorities need specialist Education advisors or equivalent to strengthen and support the curriculum developments.

Dietitians have an important role to play in all of the above and to work with all facets of the school community and their partners.

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

The Measure needs to reflect the partnership approach to school meals and all the partners that need to be involved.

'to consult with school councils from time to time to have regard to their views'. The inclusion of this new duty in section 1(3)(c) is not strong enough. Where successful changes have been made, partnerships with pupils have been the priority engaging in School Nutrition Action Groups(SNAGS), peer led education, practical cooking for example.

Also, what about parents of younger children?

The Measure should incorporate reference to health organisations as work is very much being carried out in partnership under 'Health Alliances' and 'Health, Social Care and Well Being Strategies' and health and local authorities should be coming together on public health issues. The current measure is solely an educational/local authority Measure and therefore is not aligned with current practice and ways of working.

The establishment of School Nutrition Action Groups with representation from School governors, pupils, school catering, community dietitian, teaching staff and parents would support the availability, promotion and provision of healthier food in schools

Requirements for schools to have food and fitness policies(Appetite for Life recommends but does not require)

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.

Length of meal times and queuing are the biggest barriers to pupils being able to choose to eat a balanced, nutritious meal and it is important that this is looked at in the Measure, particularly length of lunch hour. Head teachers are increasingly reducing lunch hours to enable pupils to leave earlier and this has a huge impact on availability, choices and serving of food. Unless this is addressed and more importance paid to the social aspect of lunch times and eating the Measure is unlikely to lead to increased uptake of healthier choices.

Legislation must take account of all school food but must be supported with resources/information to enable parents and pupils to make healthier choices.

Consideration needs to be given to food sold immediately outside the school grounds.

Include 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.

Consideration regarding the training of lunchtime supervisors employed separately by individual schools.

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.

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.

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 requirements, learning disabilities 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.

Do you think the proposed 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?

As already mentioned, there is some concern that the scope of this Measure is too narrow. It states that it is about the promotion of healthier eating and ensuring a 'holistic approach' however, the extent of the Measure is not sufficient to achieve a whole school approach.

For this to be 'a holistic, comprehensive 'made in Wales' policy on nutrition in schools', consideration will need to be given to all of the points described above.

Consideration may also need to be given to incentives for school children and schools.