

Welsh Local Government Association and Association of Directors of Education in Wales

HES(3)-04-08(p2)

Introduction

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities, the three fire and rescue authorities, and four police authorities are associate members.
2. It seeks to provide representation to local authorities within an emerging policy framework that satisfies the key priorities of our members and delivers a broad range of services that add value to Welsh Local Government and the communities they serve.
3. The Welsh Local Government Association welcomes the opportunity to provide evidence to the Committee on the Proposed Healthy Eating in Schools (Wales) Measure. This evidence is to be given jointly with the Association of the Directors of Education in Wales. In addition to working with the directors of education on the content of this evidence, local authority representatives working with school catering and procurement have also been consulted.
4. The WLGA and ADEW have supported the work that the Welsh Assembly Government has undertaken in recent years in the development of the Appetite for Life strategy. The WLGA had representation on the expert group that advised on the development of the strategy and as a direct result of that work the WLGA has a dedicated, Assembly Government funded, officer working on the implementation of the strategy. Both Associations continue to be committed to the principles of Appetite for Life and have been fully supportive of the implementation of the recommendations within that strategy.
5. The principles of the proposed Health Eating in Schools (Wales) Measure are very similar to that of the Appetite for Life strategy and subsequent action plan. The WLGA and ADEW have concerns that the measure, if passed, could undermine the work that is ongoing under Appetite for Life. Both Associations would like to see a continuation of the implementation of the action plan for Appetite for Life with the possibility of revisiting this statutory approach, if it is required, in the future.
6. If the proposed Measure is successful then the Assembly Government will be obliged to fund any new burdens placed on local authorities. The costings for the Measure are outlined in the impact assessment and show a relatively modest amount for the direct costs of the Measure. In impact assessment identifies costs incurred by Estyn for increased inspection responsibilities. Other areas identified, such as promotion of healthy eating are identified as already receiving funding via the Appetite for Life action plan. An area that is not costed is the promotion of the uptake of free school meals, this rightly identified as an area of current research. However, this area could have a significant impact on schools as one of the tested methods of increasing free school meal uptake is to install cashless smart card systems.
7. The impact assessment also highlights the substantial cost implications of introducing new nutritional standards, but does not include them in the direct costs of the Measure as the standards would be introduced separately as Regulation. The Food in Schools Working Group, who oversaw the development of Appetite for Life, estimated that the cost of introducing stricter nutritional standards would be between £17 - 38 million. It is the case that the Minister already has powers to implement nutritional standards for school meals via provision in the Education and Inspection Act 2006. It is a concern that if this Measure is passed then the incremental approach that is currently being taken could be altered which will have an impact financially.
8. The Appetite for Life strategy is engaging four local authorities in an action research project. Schools participating in the action research will test the introduction of the proposed, more stringent, standards not just for school lunches but also minimum standards for the provision of food and drink available in the whole school day. At the same time schools not participating in the project, who wish to work to higher standards than the current minimum requirements are being supported in this process.
9. The piloting of new standards allows local authorities, schools and the Assembly Government to develop a clear and evidenced based understanding of the financial implications of more stringent food and nutrient standards. The costs of introducing the new standards comes from increased costs of ingredients, increased staff time and also the potential slump in the uptake of changed menus. The current two year implementation process for Appetite for Life will allow for a smoother transition to the new requirements, especially in secondary schools where it has proven to be harder to introduced new menus.
10. The development of Appetite for Life was informed by the responses to an extensive consultation exercise and on lessons learnt from other parts of the UK. This has shown that there have been substantial financial difficulties in England with the introduction of a set of statutory requirements for school food. This was not only due to the downturn in meal numbers in both primary and secondary but also in the loss of trading surplus as food costs are higher and because labour costs increase as higher skills are needed to prepare fresher, healthier food to meet the standards. Financial consideration also has to be given to recent increases in the cost of foods which are currently estimated at between 17 - 20%. Taking all these factors into consideration it is the opinion of the WLGA that the Appetite for Life approach should be continued in order to fully assess the financial implications of introducing new nutritional standards and also allow time for the transition to be made to mitigate against a sharp down turn in the number of children and young people who eat school meals which would have nutritional and financial implications.
11. The current two year timetable for the implementation of the Appetite for Life action plan will also allow all stakeholders to be

involved in the process, including children and young people. Concerns were expressed by the Local Authority Catering Association (LACA) over these timescales because there was a worry that two years may not be a long enough transition period. Therefore, a statutory obligation and potentially shorter timescales would not be helpful to local authorities who are working towards improved nutritional standards in schools. Local authorities need to be given flexibility to work with their schools to introduce the new nutritional standards in a way that is appropriate to local circumstances.

12. The proposed Measure would impose a duty on governing bodies, head teachers and the local authority to promote healthy eating in schools. The governing body would also be required to include healthy eating in their annual report. In addition to this the Minister would have to report annually on progress made in improving nutrition in schools and improving standards. Although a clear reporting structure can be useful, it has been identified in Appetite for Life, and other research, that a whole school approach is needed to make the successful transition to a more nutritionally balanced menu. This includes the full support and understanding of head teachers, teaching staff, governing bodies, catering staff, students and parents. With the approach currently being followed via Appetite for Life the two year action research project will allow for partnerships to be built and developed and to allow all stakeholders to fully understand their part in improving the health of children and young people in their school. The current programme also gives sufficient time to work with children and young people to develop their understanding of healthy eating and a healthy lifestyle in general. This approach will be more successful at ensuring a whole school buy in rather than stringent reporting mechanisms.

13. In conclusion, the WLGA and ADEW agree with the principles in the Measure, as they are very similar to those in the Appetite for Life strategy and action plan. However, it is important that Appetite for Life research and projects continue, in order to make a full assessment of the financial implications and to allow a smooth and planned transition to improved nutritional standards. The statutory approach was taken in England which has resulted in problems of implementation, both financially and nutritionally. It would be useful to reassess this type of statutory approach in the future when the outcomes of the Appetite for Life work have been fully assessed.

For further information please contact:

Daisy Seabourne

Daisy.seabourne@wlga.gov.uk

Welsh Local Government Association

Local Government House

Drake walk

Cardiff

CF10 4LG

Tel: 029 2046 8600