UCAC

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Evidence for the Committee on the Proposed Healthy Eating in Schools (Wales) Measure 2008

June 2008

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

A Measure can support and strengthen the existing measures and ensure a holistic whole-school approach to healthy eating. However, care must be taken not to duplicate what is already available and not to spend money unnecessarily and create an additional work load.

There will be no means for the Measure to address the nature of the food that pupils bring from home, therefore the Measure alone is not going to change society's attitude towards healthy eating. It is possible that it will not reach some of our children and young people.

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

a) the duty on Welsh Ministers, governing bodies, head teachers and local education authorities to promote healthy eating in schools:

These all need to work together to ensure a suitable provision of healthy food for our children and young people.

b) 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

We have concerns about how it will be possible to inspect healthy eating in schools. The school's policy and the school's effort should be inspected rather than achievement. It is not possible to force children and young people to eat healthily. So many factors affect their choices of food, and a school's success / failure should not be measured according to the number of pupils who eat healthily. The influence of habits at home is so strong where food is concerned.

The cost of having inspectors who specialise in nutrition standards, or nutrition standards experts who are trained as inspectors, must also be considered. Are we talking about one person per team of inspectors?

c) 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

Perhaps it is possible to ensure maximum levels in the meals prepared for the pupils, but what about special events such as a children's Christmas party, open evenings or parents' evenings when parents contribute towards the food provided? There is a danger of such social events coming to an end if it is not possible to make exceptions occasionally.

The Measure also mentions trips and visits. It is difficult to control food standards on these type of occasions. UCAC is concerned about how it would be possible to control pupils' choices of food when they are on a visit, e.g. theatre, holiday abroad, Theme Park. How accountable will schools be for this? Impractical.

d) encouraging take up of school meals and protection of identity of those who receive free meals

UCAC agrees that there is a need to provide healthy food in schools and encourage pupils to eat school meals. The cost of each meal must be considered in an arrangement where the pupils may choose their food.

UCAC believes that using local produce, wherever possible, should be part of the guidelines for the providers.

There is certainly a need for protecting the identity of those who receive free meals. Children and young people are sensitive to the stigma of receiving free meals.

e) the duty on local education authorities to ensure availability of drinking water for pupils

UCAC agrees that the availability of drinking water on school premises is important. Maintaining the provision, if we're talking about water coolers, has serious financial implications.

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

The costs of funding the policies / developments

UCAC does not believe that it is the schools and the LEAs who should pay for any additional costs involved in implementing the Measure. It is the responsibility of the Welsh Assembly Government to fund it fully. Healthy eating is not a matter that involves the world of education alone. It is a social problem, and a medical problem with many factors affecting people's choices. In the long term, any improvements will save money for the health and social services.

Again, UCAC recommends that the reports on the developments should be submitted by the Governing Bodies for three years only. The Welsh Assembly Government usually funds individual plans for three years only, after which the money is included in the annual settlement. In other words, the money gets lost in the Welsh education funding fog.

UCAC does not support any funding arrangement that is dependant on schools / LEAs making an individual bid or application for funding. Such systems add to the work load and can lead to unfairness.

A fair formula should be established that ensures that every authority and every school can fully meet the requirements of the Measure, without increasing their costs.

It must also be kept in mind that some of the costs will have to be sustained permanently, e.g. providing water on the school site, if this is to be the water cooler system.

Contracts

Will the changes be introduced as the contracts for food provision to schools are renewed, or will the Measure have the right to change the contracts before they expire? (This may mean additional costs).

Protecting the identity of those who receive free meals

It is so important to ensure this. Some schools are in a better position than others in terms of the arrangements they have in place. It may be worth considering some of the most successful examples and cost them before recommending them to schools that need to change their arrangements. There are cost implications here, too.

In the explanatory document, point 8.61, there is mention of an electronic system for determining eligibility for free school meals. It is not clear in the explanation whether parents would be expected to apply "online". If so, we ask that the Welsh Assembly Government ensures that other means of applying are also provided. The least privileged families are less likely to own a computer and less likely to have information and communications technology skills.

We also ask whether there is a real need to commission a specific report to discover why pupils do not take the opportunity to receive free school meals. (This is suggested in 8.60). UCAC feels that this would be a waste of money. Are the main reasons not already clear? Namely, the stigma attached to receiving free meals (unless there is a special arrangement in place in the school to protect their identity), the standard of food in some schools, not wishing to change to eating healthily if they are used to totally different foods? Would it not be better to firstly address protection of identity and see if the situation improves before spending money on commissioning a report? Whatever system is chosen, the individual's rights must be safeguarded. UCAC is aware of one school where children's fingerprints are used in the canteen rather than paying there and then, but some parents have stated that they do not wish for the school to take and use their children's fingerprints.

Resources and human resources

The Measure refers to the duty of an LEA to "have regard to any relevant reputable scientific advice." Should it not be sufficient to follow the Assembly's guidelines? Who is to determine what is "relevant" and "reputable"?

Some schools' kitchens need to be improved (some schools remain without a kitchen and must get their food from another site).

More teachers who have **specialised** in Cookery / Food Technology are needed.

Administration costs, e.g. the annual report and costs in terms of time spent working on preparing the report.

Although the Governing Body is to prepare the report (the Headteacher was originally named), it must be kept in mind that it is likely to be the Headteacher who will collect the information etc.

Suitably trained inspectors i.e. nutrition experts who are trained as inspectors. Are we talking about one person per team of inspectors?

Primary Schools and Food Skills

Not every Primary School has access to the school's kitchen equipment. What about current Health and Safety matters? Does this limit Primary School children's experiences of preparing food?

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

Although we do not have many PFI schools in Wales, in some cases it is the finance company that has the right to run vending machines, and the right to determine their contents. UCAC would like to see the Measure change this to ensure that these machines also have to provide only healthy drinks / snacks. UCAC voiced this concern in its response to the original consultation.

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?

Yes. But it must be kept in mind that we cannot Legislate that children and young people must eat what the school provides. The school can only encourage. Therefore the Measure is sure to develop a holistic and comprehensive policy, but it is harder to anticipate what the pupils' response will be, and thus what the **implementation** of the policy will be.

There is a need to ensure other things as well if we want to see permanent changes, in the long term. The importance of Cookery / Food Technology skills needs to be re-established. At present, no College in Wales offers a course for prospective Cookery / Food Technology teachers. There is a need to provide an Initial Teacher Training course for Cookery / Food Technology Teachers in Colleges. Maybe the Assembly Government could consider a Bursary (Golden Hello) to attract people to teach in the field? Maybe a secondment course could be funded for those wishing to diversify?

What is the point of providing healthy food for our pupils if we do not teach them how to prepare healthy meals after leaving school? And teaching them the theory in PSE and Physical Education lessons is not going to be enough to ensure that they can cook!

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