

Cardiff Institute of Society, Health and Ethics

HES(3)-06-08(p1)

Dear Ms Williams

Thank you for the invitation to submit evidence to the Committee. I am pleased to do so, on behalf of the Cardiff Institute of Society, Health and Ethics (CISHE), of which I am Director. I provide brief responses to each of the consultation questions below.

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

Yes, we welcome this measure since existing arrangements fail to ensure that all schools accord healthy eating the priority that it deserves, and are not required to have regard to guidance or scientific advice on policies or actions that have an impact on pupils' diet and nutrition. This leads to highly variable practice, much of which is inadequate or ineffective.

"2. 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;"

Yes, effective school action to promote healthy eating will benefit pupils' educational performance and long term health.

"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;"

Yes, this is very important, as it will ensure that all schools accord healthy eating the importance that it deserves. However, sections 4, 5 and 6 do not require school governors, the Chief Inspector of Schools or Welsh Ministers to report on whether steps taken to promote healthy eating are in accordance with the guidance and advice detailed in Section 1 sub-section (3). There is the danger that ineffective action is implemented and replicated rather than steps that are most likely to be effective.

"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;"

Yes, although the detail of the content of the standards is important and not currently specified.

"encouraging take up of school meals and protection of identity of those who receive them;"

Yes. Consistent research that nutritional content of packed lunches and, in particular, lunches bought away from the school site, is inferior to that of school meals.

"the duty on local education authorities to ensure availability of drinking water for pupils."

Yes, important to do this, but also important to restrict access to sweet and/or carbonated drinks on school premises.

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

The guidance mentioned in Section 1 sub-section (3) will be important in helping schools and authorities to identify effective action. Substantial research evidence is emerging regarding effective measures, including work undertaken in CISHE highlighting (1) the importance of training and engaging lunchtime supervisors to support healthy eating; (2) the importance of multiple actions to promote healthy eating; (3) the importance of reinforcing actions such as fruit tuck shops with policies such as restrictions on foods that pupils can bring to school. The development and dissemination of this guidance needs to be planned and schools supported in interpreting and implementing the guidance.

Schools, Chief Inspector and Ministers are required to report on the extent to which there appears to be an increase in healthy eating, but the details of how data are to be collected are not given. The costs of collecting such data should not be underestimated, and the value of such data will be limited unless they are collected following a well designed protocol. It may be more efficient to require schools, Chief Inspector and Ministers to collect data on school actions taken and the extent to which these actions follow guidance, with another independent mechanism used to identify impact on healthy eating. One option may be to continue or expand the Welsh Youth Health Surveys which would be a cost-efficient source of high quality monitoring data.

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

Section 1 sub-section (4) specifically states that authorities will not be required to impose any restriction on the nature, quality or quantity of food or drink brought by a pupil to school, but it will make it much more difficult for school measures to improve healthy eating to be effective if pupils are still able to bring unhealthy foods to school. This is both for the individual pupil concerned, but also has a detrimental effect on the critical aspect of changing norms and acceptability among pupils, where peer modelling and peer influence are such strong determinants of child and adolescent behaviour.

A provision for evaluation and monitoring would be welcome.

"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, although I think its success will be critically determined by high quality guidance and support mechanisms. Otherwise, the measure may be perceived by many schools and authorities as an additional burden, bringing on additional work and expense and leaving schools with the job of identifying what to do, which will be time consuming and frequently liable to lead to increased volume of inadequate, ineffective or even harmful actions.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Laurence Moore', with a horizontal line underneath.

Professor Laurence Moore

CISHE is a collaborative venture between Cardiff School of Social Sciences,

Cardiff Law School and the Centre for Health Sciences Research

"Mae AGIMC yn fenter gydweithrediadol rhwng Ysgol Gwyddorau Cymdeithasol Caerdydd, Ysgol y Gyfraith Caerdydd a'r Ganolfan Ymchwil Gwyddorau Iechyd"