

Her Majesty's Chief Inspector of Education and Training in Wales

HES(3)-06-08(p2)

Consultation - Proposed Healthy Eating in Schools Measure Committee

Response from HMCI, Estyn

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

From April 2007, inspectors were required to comment in Key Question 4 on whether a school has arrangements that encourage and enable learners to be healthy. This new inspection requirement was proposed in Estyn's report 'School meals: advice on the role of inspection in monitoring school meal standards' in 2006. Estyn published guidance in advance about inspecting healthy living within 'Inspection Matters 8' in September 2006 and followed this with 'Supplementary guidance on inspecting healthy living (including physical activity and food and drink)' in May 2007. The guidance was summarised in Estyn's newsletter to schools in September 2007.

'Food and fitness: a report on how well schools in Wales support children and young people to be healthy and active' was published in May 2008 in response to a request from the Welsh Assembly Government in the 2007-2008 remit to Estyn to identify how well primary and secondary schools are doing in Wales in improving pupils' health with an emphasis on physical activity and healthy eating. The evidence base for this report includes:

reports on primary and secondary school inspections between September 2005 and December 2007;

survey visits to 12 primary schools and 8 secondary schools in the autumn term 2007, which included listening to learners as well as discussions with staff, and

discussions with 15 local authority school improvement officers and Healthy School coordinators.

This report details good features and shortcomings in the ways that schools promote healthy eating as part of their work to support children and young people to be healthy and active. The report includes recommendations to schools, and the Welsh Assembly Government (see Appendix 1).

Some of these recommendations relate directly to whether pupils eat healthy food at school or not and suggest that the initiatives in place at the time Estyn carried out its survey are not enough and that there is a need for further action. The relevant recommendations from Estyn's 'Food and fitness' report are as follows:

schools should review their lunch time arrangements to ensure that they support healthy living in line with the good practice highlighted in this report:

schools should plan for and set targets to increase the take-up of free school meals;

schools should plan to meet the new nutrient, food and drink standards in the Appetite for Life Action Plan;

schools should ensure that toilets and changing facilities meet appropriate minimum standards;

the Welsh Assembly Government should work with schools and local authorities to ensure that all schools meet the new nutrient, food and drink standards in the Appetite for Life Action Plan as soon as is practicably possible and set a target date for this;

the Welsh Assembly Government should work with schools and local authorities to fund improvements to catering and dining facilities and facilities for teaching pupils how to prepare and cook food; and

the Welsh Assembly Government should work with schools and local authorities to introduce minimum standards for school toilets and changing facilities.

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

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

The proposed duties build on the existing duties and action being led by the Welsh Assembly Government (as highlighted in the Minister's paper to the committee, dated 28 May 2008).

The duties have been refined to reduce the reporting burden on headteachers that would have resulted from the proposal in the consultation paper for this Measure. Schools that update their self-evaluation regularly will be able to provide governors with information to include in their annual report.

The duties will help address the following recommendations in Estyn's report 'Food and fitness':

schools should plan to meet the new nutrient, food and drink standards in the Appetite for Life Action Plan;

schools should plan for and set targets to increase the take-up of free school meals; and

the Welsh Assembly Government should work with schools and local authorities to: ensure that all schools meet the new nutrient, food and drink standards in the Appetite for Life Action Plan as soon as is practicably possible and set a target date for this

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

Estyn has provided an analysis of the costs associated with inspecting food standards in schools as part of the inspection regime, based on the model currently used in Scotland (see Appendix 2).

Estyn is currently reviewing its Common Inspection Framework in preparation for the start of new 6-year inspection cycle in September 2010. The general trend of school inspections is to make them more proportionate to need and based on an assessment of risk. In this context, including additional inspection requirements on whatever issue would not in general be in line with the policy of slimming down and rationalising the inspection of public services in Wales. In addition, including a nutritionist on every inspection team would be costly, as indicated in the information provided in response to the consultation on the Measure and Estyn would require significant additional resources to implement that approach.

Estyn recommends carrying out specific thematic, survey work to evaluate the progress schools are making in promoting healthy eating. This would be a more efficient, targeted and flexible approach to providing the Welsh Assembly Government with information and analysis than could be included in school inspection reports. Estyn could work in partnership with the Food Standards Agency and Healthcare Inspectorate Wales as appropriate in carrying out this survey work. This joint working would have the benefit of allowing us to broaden the scope of any survey work to include more detail about nutritional standards and other data to do with the health of children and young people. This survey approach would also focus on healthy living and healthy eating annually to take account of the incremental approach to change in schools and to focus on specific areas of interest such as the take-up of free school meals or compliance with nutrition standards.

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

In its 'Food and fitness' report, Estyn recommends that schools should plan to meet the new nutrient, food and drink standards in the Appetite for Life Action Plan. Estyn also recommends that the Welsh Assembly Government should work with schools and local authorities to ensure that all schools meet the new nutrient, food and drink standards in the Appetite for Life Action Plan as soon as is practicably possible and set a target date for this.

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

In its 'Food and fitness' report, Estyn identifies reasons why pupils do not have a school meal and recommends that schools should review their lunchtime arrangements to ensure that they support healthy living. The quality of the dining experience affects whether or not pupils choose to have a school meal. Pupils are more likely to have a school meal where:

food is freshly prepared;

queues are not too long;

the dinner break is long enough;

the dining hall is attractive, warm and clean and not overcrowded or noisy;

there are small tables and individual chairs rather than long table with fixed seats;

food is served on individual plates and bowls rather than on all-in-one trays; and

members of staff dine at tables with pupils.

Estyn's report notes that many schools have kitchens that require investment in new facilities. Estyn recommends that the Welsh Assembly Government should work with schools and local authorities to fund improvements to catering and dining facilities.

Estyn also found that, in secondary schools, pupils who are eligible for free school meals often do not take up their free school meal if they are allowed off-site, because they wish to be with their friends. Estyn recommends that schools should plan and set targets to increase the take-up of free school meals.

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

In its 'Food and fitness' report, Estyn notes that almost all schools encourage pupils to drink enough water during the day. Only one school inspected between April and December 2007 was criticised for not giving pupils enough access to water.

A very few schools have water fountains or points for filling water bottles within toilet areas and this is not hygienic. Aspects of toilets are unsatisfactory in half of the secondary schools and in a quarter of primary schools surveyed for Estyn's report. Where pupils are not happy with the condition of school toilets, they are more likely not to drink enough water during the day so as to avoid using them.

Estyn recommends the Welsh Assembly Government should work with schools and local authorities to introduce minimum standards for school toilets and that schools ensure that toilets meet appropriate minimum standards.

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

The implications for Estyn are covered in the response to the second bullet point in question 2.

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

The Welsh Assembly Government should ensure that it addresses the recommendations from Estyn's 'Food and fitness' report. It will not achieve this entirely through this Measure but the scope is too narrow to address all the matters relating to healthy eating. In particular, there are environmental factors that affect what pupils eat and drink during the school day as raised in the response to the fourth bullet point in question 2 such as the overall dining experience and the school's view on allowing pupils off site at lunchtime.

Estyn's report contains more detailed findings about these issues. The Welsh Assembly Government could provide guidance about these issues to schools and local authorities in order that they can promote healthy eating more holistically.

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 is likely to contribute to improvements in healthy eating, alongside existing action being taken by the Welsh Assembly Government, particularly in relation to the provision of food and drink. However, the environmental factors referred to in the response to the previous question must be considered when guiding schools and local authorities about their duty to promote healthy living to ensure that schools have a holistic and comprehensive approach. The success of the Measure would, therefore, depend in part on the strength of the guidance that follows it and the support for implementation of this guidance.

Appendix 1: Main findings and recommendations from the 'Food and fitness' report (Estyn May 2008)

Main findings

Food and drink

1. Breakfast clubs, particularly in primary schools, have a positive impact on the health and wellbeing, behaviour, punctuality and attendance of the pupils who participate.

2. The quality of the dining experience affects whether or not pupils choose to have a school meal. Pupils are more likely to have a school meal where:

food is freshly prepared;

queues are not too long;

the dinner break is long enough;

the dining hall is attractive, warm and clean and not overcrowded or noisy;

there are small tables and individual chairs rather than long tables with fixed seats;

food is served on individual plates and bowls rather than on all-in-one trays; and

members of staff dine at tables with pupils.

3. Many schools have kitchens that require investment in new facilities. A few schools do not have kitchens on site and meals are prepared elsewhere and transported to the school; the delay between the cooking and serving of food results in meals that are less appealing for pupils.

4. Pupils who are allowed off-site at lunch times often buy food in local shops and cafes. Whilst this can be cheaper it is usually not as nutritious as food provided in school. Pupils who are eligible for free school meals often do not take up their free meal if they are allowed offsite, because they wish to be with their friends.

5. All schools have improved the range of healthy food and drinks on offer in recent years. Almost all offer healthy options at breakfast clubs, tuck shops, snack bars, canteens and vending machines. Even so, most schools still sell food and drinks of little nutritional value as well.

6. Almost all schools provide opportunities for pupils to learn about healthy living issues as part of the curriculum. As a result, pupils generally have a sound knowledge and understanding of healthy living. However, in a majority of the schools surveyed, there are not enough facilities to teach pupils how to cook and prepare food for themselves.

7. Many schools do not coordinate learning about healthy living effectively across the curriculum. This can lead to repetition and the use of confusingly different models to explain the right balance of foods in a healthy diet. Most members of staff who are responsible for coordinating healthy living work receive enough training but this is usually focused on teaching aspects of healthy living rather than coordinating the delivery of healthy living work across the school.

Physical activity

1. Schools that participate in initiatives such as Physical Education and School Sports (PESS) and Dragon Sport are effective in encouraging pupils to be more active. These schools normally provide pupils with the recommended minimum of two hours a week of physical education. However, six out of every 10 of the schools surveyed do not provide this minimum. Many schools find it difficult to provide a wide range of physical activities that all pupils can enjoy and only a few provide alternatives to traditional physical education or sports activities.
2. Most schools have good arrangements to encourage pupils to be active during break times and lunch times, but only a few are successful in getting pupils to walk or cycle to school.
3. Many schools use community sport facilities well and often this leads to pupils using the facilities outside school time. Many schools have generally good equipment for physical activities, although changing areas and shower facilities are of more variable quality.

Strategic approaches for healthy living

1. School leaders are committed to young people's health and wellbeing. Most schools are actively developing their policies and practices for healthy living, particularly in relation to food and drink. Many use award schemes as a catalyst for this work. This is particularly true of Healthy School schemes and the Eco-Schools programme.
2. Nearly all schools rely on extra funding to sustain healthy living work, particularly on targeted funding from the Welsh Assembly Government. Few schools have planned how to continue this work when funding ceases.
3. Most schools work well with parents, health and social care professionals, police officers, and local and national voluntary organisations to encourage healthy and active lifestyles. Most pupils think that members of staff in their school are good role models for healthy living.
4. Aspects of toilets are unsatisfactory in half of the secondary schools and in a quarter of primary schools surveyed. Where pupils are not happy with the condition of school toilets, they are more likely not to drink enough water during the school day so as to avoid using them.
5. The school council in every school surveyed has discussed healthy living in the last two years. In most schools, taking account of the views of pupils has resulted in minor changes to the food and drink available and the arrangements at break times and lunch times. Most school councils have discussed issues that impact on physical activity, particularly the safety of walking to and from school and the range of after-school clubs on offer.
6. Only a very few schools have effective systems for evaluating the impact of their healthy living work. Most schools monitor whether planned actions have been carried out rather than evaluating the effectiveness of their actions in improving pupils' health.

Recommendations

Schools should:

1. review their lunch time arrangements to ensure that they support healthy living in line with the good practice highlighted in this report;
2. plan for and set targets to increase the take-up of free school meals;
3. plan to meet the new nutrient, food and drink standards in the Appetite for Life Action Plan;
4. improve the coordination of healthy living work across the curriculum, provide more opportunities for pupils to learn how to prepare food and use a consistent approach to teaching what makes a balanced diet;
5. provide pupils with the recommended minimum amount of physical education and offer pupils a wider range of physical activities;
6. ensure that toilets and changing facilities meet appropriate minimum standards; and
7. evaluate the effectiveness of their actions to improve pupils' health.

The Welsh Assembly Government should work with schools and local authorities to:

1. ensure that all schools meet the new nutrient, food and drink standards in the Appetite for Life Action Plan as soon as is practicably possible and set a target date for this;
2. fund improvements to catering and dining facilities and facilities for teaching pupils how to prepare and cook food;
3. introduce minimum standards for school toilets and changing facilities; and
4. provide guidance for schools on how to evaluate the effectiveness of their actions to improve pupils' health.

Appendix 2: The cost of including nutritionists on inspection teams:

The calculations following are based on the experience of HMIE in Scotland where Nutrition Associate Assessors join their inspection

teams for similar purposes. The cost would depend on the sample of inspections that would include a nutritionist. In Scotland, a nutritionist is used on some 25% of primary school inspections and some 75% of secondary school inspections. The time needed is about a day and a half for each primary school (a day inspecting and half a day for preparation and writing) and two days for secondary (a day and a half inspecting and a day preparation and writing).

Hence, the total cost for us to follow the Scottish model (assuming staffing cost of £500 a day estimated for us by the Food Standards Agency Wales) would be around **£100,000** a year ($25\% \times 240$ (primary) $\times 1.5 \times £500 + 75\% \times 60$ (secondary and special) $\times 2.5 \times £500$).

Including a nutritionist on all inspections would cost around **£250,000** a year ($240 \times 1.5 \times £500 + 60 \times 2.5 \times £500$).

These estimates do not include additional administrative costs, costs associated with training and monitoring or set-up costs for this new work.