



Consultation on amendments to the Nutritional Requirements for Food and Drink in Schools (Scotland) regulations 2008

Giving all children in Scotland an equal chance to flourish is at the heart of everything we do. By bringing together a network of people working with and for children, alongside children and young people themselves, we offer a broad, balanced and independent voice. We create solutions, provide support and develop positive change across all areas affecting children in Scotland. We do this by listening, gathering evidence, and applying and sharing our learning, while always working to uphold children's rights. Our range of knowledge and expertise means we can provide trusted support on issues as diverse as the people we work with and the varied lives of children and families in Scotland.

Children in Scotland welcomes the chance to contribute to this consultation and Scotland's progress in this area. We are firmly committed to challenging inequalities through food and have taken this forward as a key thematic priority. A pillar of this has been our multi award-winning project **Food, Families, Futures** (FFF). The project is aimed at addressing the major social issue of food poverty and its links with wellbeing, learning and attainment. We want to help break the cycle of increasing poverty and disadvantage and improve the quality of life and opportunities for people.

We are pleased to see the Scottish Government proposing action in the area of food and health, specifically around food and drink regulations in schools, building on '[Hungry For Success](#)'. We are also pleased the 2017 the short life technical working group TWG put the health and wellbeing of children and young people at the heart of their considerations.

Food and nutrition are of course central to good health and wellbeing. We fully support all schools providing activities and an environment which promotes the physical, social, mental and emotional health of pupils in attendance.

Child health and link to poverty

Food poverty has been described as ‘the inability to consume an adequate quality or sufficient quantity of food that is useful for health in socially acceptable ways, or the uncertainty that one will be able to do so’¹. There is a clear link between food poverty and obesity and the problem in Scotland is stark.

In early 2017 we presented a paper to Westminster’s All-Party Parliamentary Group (APPG) on hunger, based on research and our own direct experience with children and families. In 2014 31% of children (aged 2-15) were at risk of being overweight or obese (of which 17% were at risk of being obese)². According to modelling used in the Foresight Report, by the year 2050 25% of all children under 16 in the UK could be obese.³ Children and young people who experience obesity are also likely to continue to experience this into adulthood and are at risk of a variety of side effects such as coronary heart disease or strokes⁴.

There are competing and interlinked causes of obesity, however there is a clear link to social inequality⁵. Research suggests that the experience of poverty and deprivation are particularly important factors in childhood obesity.⁶ [Scotpho](#) highlights that based on data from the [Scottish Health Survey 2016](#) men living in the least deprived quintile 20% were obese compared to 29% living in the most deprived quintile, and 40% in the second most deprived quintile. For women, living in the least deprived quintile 20% were obese compared to 35% in the most deprived quintile⁷.

The Scottish Government estimates that 220,000 (more than one in five) of Scotland’s children are living in poverty.

As stated in the Foresight Report, the distinction between prevention and treatment of obesity is important. Weight is difficult to lose once it is gained and many people find it difficult to maintain weight loss. An emphasis on prevention is essential. This will require changes in the environment and behaviour across society.⁸ School food and drink is one such important area.

¹ Riches, G (1997) Hunger, food security and welfare policies: issues and debates in First World societies. *Proceedings of the Nutrition Society*, 56(1a): 63-74.

² Brown L, Christie S, Gill V et al The Scottish Health Survey 2014 Volume 1 Main Report 2015

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/287937/07-1184x-tackling-obesities-future-choices-report.pdf Foresight Report

⁴ http://www.fph.org.uk/uploads/HealthyWeight_SectA.pdf

⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/287937/07-1184x-tackling-obesities-future-choices-report.pdf Foresight Report

⁶ Information Services Division Scotland. Primary 1 body mass index (BMI) statistics Scotland – school year 2014/15. 2016

⁷ scotpho.co.uk

⁸ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/287937/07-1184x-tackling-obesities-future-choices-report.pdf Foresight Report

Children and young people's participation

The particular impact of social factors on the health of children and young people suggests that children and young people should be put at the heart of solutions.

At Children in Scotland we champion children and young people's participation and inclusion in this process. Children and young people should be actively listened to, treated fairly and have their opinions respected and taken seriously. Their views must be listened to and acted on with regards to decisions that impact on their lives. Children and young people should be empowered and play a full role in the 'process' from planning, through delivery to evaluation.

We know from national projects we have worked on that children and young people want to be active participants in any change around food and diet specifically.

'I think it is important to do this because it inspires children to change school meals and eat healthy.' (BEFL participant)

On a national level, the Scottish Government should work with organisations who work with children and young people to ensure a representative group are meaningfully engaged with to develop a strategy that is fully reflective of their needs.

The Scottish Government should take on learning from our **Food, Families, Futures** project. It is essential that all stakeholders are involved in the co-design, co-production and evaluation of any food policy and practice. A sense of ownership will help ensure engagement and success. In developing a policy approach that works we need to be drawing on evidence 'in the round': from projects such as FFF, available research evidence, and most importantly from the testimony of children about what works best for them.

On a national or more local level the Scottish Government and Local Authorities should explore the co-production of school dinner menus with children and young people. Putting children and young people at the heart of these decisions and ensuring meals reflect their views is also likely to increase take up.

Food environment in and around school

This is of particular concern to the health of children and young people as they are likely to be exposed to food outlets close to schools. Anecdotally, from working directly with children and young people, we know these outlets often have cheap lunch time deals for unhealthy produce. Limiting price

promotions on unhealthy produce (together with more assertive licensing legislation to ensure banning price promotion is enforced, hand in hand with measures that could support these outlets to provide healthy options) will likely decrease demand for such outlets. This is likely to have the added benefit of encouraging uptake of school meals where children and young people can consume healthier meals.

We would also like to see further focus on the quality of food served in school vending machines, if indeed vending machines have a place in school buildings. Marketing school vending machine produce that consists of sweetened yoghurts, crisps and high-sugar but low-fat bars 'as healthy' is unhelpful for school pupils, families and wider public understanding of health and nutrition. It would be good to explore how this can be further regulated to ensure the products available to children and young people are good for their health.

In response to the 5 consultation questions

We are supportive of the Scottish Government's move to amend the current school food and drink Regulations to ensure:

- children and young people are able to access more fruit and vegetables as part of their school day and to ensure
- the amount of sugar children and young people can access over the course of the school day is reduced
- there is a maximum limit introduced for red and red processed meat in primary school lunches and for overall provision in secondary schools
- caterers provide a service which better supports secondary age pupils to make balanced and nutritious food and drink choices as part of their school day

Evidence shows that to improve obesity rates among children and young people it would be effective to target sugar sweetened beverages as a whole. In Scotland we consume almost three times the recommended maximum amount of sugar and sugar-sweetened beverages are the biggest source of free sugar in the diet of Scottish children.⁹

We also support tighter regulations on the fat and sugar content of food to ensure the market is supporting a healthier nation and in particular for regulation around the type of food distributed to schools and services used by children, young people and families. We believe all future regulations should ensure that schools and other such services receive only produce low in fat, sugar and salt to support children, young people and families to consume a healthy diet.

⁹ <http://www.obesityactionsotland.org/briefings/> Soft Drinks Levy

However, Children in Scotland is not best placed to comment on specific details as to how these nutrition standards are calculated and delivered. We know our colleagues at Obesity Action Scotland for example are giving a more specific response to the four questions around fruit and vegetables, sugar, red meat and how caterers provide this service, including: access and consumption of vegetables; a simple to use process and system to reduce sugar; restrictions around red meat and processed foods generally.

For further information please contact

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