



UNISON Scotland response:

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

August 2018

Introduction

UNISON is Scotland's largest trade union with members across the public, private and voluntary sectors. We have many members working in education, including in catering, providing school meals, and in the NHS, where the proposed changes should help in tackling obesity and improving health and wellbeing overall through improved diets. We welcome the opportunity to respond to the consultation on the amendments proposed following the report of the short-life Technical Working Group (TWG) reviewing the current school food and drink regulations.

Background

UNISON has had a longstanding interest in the extremely important role of school meals and nutrition in schools, as part of our wider calls for tackling inequalities across society, including in education and health. Children learn better when they have been eating well and healthily. We call again for free school meals throughout primary and secondary schooling. In 2002 we argued in our response to a consultation document by the Expert Panel on School Meals:

"Unison Scotland supported the recent School Meals (Scotland) Bill. We strongly believed that the Bill tackled poverty and social exclusion, provided a welfare service free at the point of use, addressed poor nutrition standards in Scotland and related health problems, and a whole range of socio-economic and behavioural issues."

We have consistently repeated this call over many years in our Food for Good campaigning for fresh, healthy and sustainable food across public service catering, including in schools, nurseries, hospitals, care homes and prisons. In recent years, we have also been part of the Scottish Food Coalition¹, campaigning for a just transition to a fair, healthy and sustainable food system. We urge the Scottish Government to bring forward their promised consultation on a Good Food Nation Bill to reassure people that they have not abandoned² plans for the Bill.

Our Food for Good Charter³ says:

"Universal free school meals are a major contributor to access to good nutrition, improving health and tackling childhood obesity. As a minimum, these should be provided in all primary schools. The aim for all public service catering should be for a minimum of at least one daily

¹ <http://www.foodcoalition.scot/>

² https://www.theredrobin.scot/snp_reportedly_considering_dropping_good_food_bill?recruiter_id=2

³ <http://www.unison-scotland.org.uk/foodforgood/2013FoodforGoodCharter.pdf>

option of an organic/ethically produced main meal, ideally locally sourced. Vending machines on school/hospital premises should use healthy alternatives, not junk/fast food.”

Our recommendations in the Charter also include providing fresh, locally prepared, sustainably sourced food, less meat-intensive diets, lessons in preparing healthy meals and on the global food system’s high contribution to greenhouse gas emissions.

The Charter is strong on social justice (among the wide range of policy areas it covers) and UNISON has done considerable work on tackling health inequalities. We note that an August 2018 report from NHS Health Scotland on health inequalities found that “nearly a third (32.9%) of early deaths and ill health could be avoided if the whole population had the same life circumstances as the people who live in our wealthiest areas”⁴.

That Scottish Burden of Disease: Deprivation Report⁵ states:

“While ischaemic heart disease continues to cause the highest burden, this study highlights the need to pursue the public health priorities of mental health, alcohol, tobacco, drug problems, diet, healthy weight and physical inactivity. Research shows that individual behaviour change initiatives will not generate the step change in health that is needed in Scotland. A combination of bold policies to reduce poverty and adversity, alongside regulatory changes such as those seen for alcohol and tobacco to reduce unacceptable inequalities in burden, with bold public health leadership in local planning and communities, will create the conditions to reduce the overall burden of disease.”

The bold policies should include free school meals for all children. The report refers to the Health Inequalities Policy Review of 2015 for measures likely to be effective or ineffective. That review refers to free school meals (as part of equitable provision of high quality and accessible education and public services) as being among the examples of effective actions:

“Fiscal: raise the price of harmful commodities like tobacco and alcohol through taxation; reduce or eradicate the price barrier for healthy products (e.g. healthy foods); essential services (e.g. water, education, health care) and prevention services (e.g. free smoking cessation, eye tests, school meals and fruit and milk in schools)”

In UNISON’s Combating Austerity campaigning, we identify the difficulties of harnessing improvements from preventive spending at a time of massive reductions in public spending. However, we believe all the evidence points to not just the societal and individual benefits of improved education/health that free school meals would provide, but also the financial benefits in terms of cost to the health service of the burden of treating ill health and diseases linked to poor diets.

Given the rise in food bank use and pressures on so many families due to welfare cuts and low pay, causing ‘holiday hunger’, we applaud the work of those local authorities providing

⁴ <http://www.healthscotland.scot/news/2018/august/twice-as-likely-to-die-early-or-live-with-ill-health-if-you-live-in-the-poorest-areas>

⁵ <https://www.scotpho.org.uk/media/1656/sbod2016-deprivation-report-aug18.pdf>

free school meals for children during holidays and the major initiative by North Lanarkshire Council to provide free meals for low income families 365 days a year⁶.

We welcome the proposed amendments to the Regulations and provide the answers to the consultation questions below. We also want the Scottish Government to ensure joined up thinking as appropriate with improvements to relevant nutritional guidance, food standards etc., for early years providers⁷.

These are our answers to the consultation questions:

1. What are your views on our intention 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?

We welcome ensuring that children can access more fruit and vegetables as this has a major part to play in health. Starting/reinforcing this habit young will hopefully help set children into good eating patterns for life.

As noted above, food should be fresh and sustainable, following the principles in our Food for Good Charter.

Many other factors impact on this, including staffing levels and budget for school meals. However, we would point to the excellent and pioneering example of healthy food provided by East Ayrshire Council in their school meals as good practice that should be widely shared. We hope their approach and menus were part of the evidence considered by the TWG and that such examples of good practice are used in promoting how to deliver healthy, sustainable food and drink in schools.

We note that the TWG said:

“The primary focus of the Technical Working Group was the health and wellbeing of children and young people. The proposed nutritional standards are based on the consensus view of the current science and evidence base in relation to diet and health.”

We believe that it is important and good practice to review and update the standards as the science and evidence base evolves.

2. What are your views on our intention to amend the current school food and drink Regulations to ensure the amount of sugar children and young people can access over the course of the school day is reduced?

We welcome protecting children by reducing the amount of sugar they can access. Again, this is wider than just these regulations, including consideration of what food and drink children can buy near school grounds, and the influence of advertising etc.

⁶ <https://www.bbc.co.uk/news/uk-scotland-glasgow-west-45117543>

⁷ <http://www.healthscotland.com/uploads/documents/30341-Setting%20the%20Table.pdf>

3. What are your views on our intention to amend the school food and drink Regulations to set a maximum for red and red processed meat in primary school lunches and for overall provision in secondary schools?

This is a positive step and fits with our Food for Good Charter recommendations and helps towards sustainability, contributing not just to improved health but towards reducing greenhouse gas emissions. Our Charter includes animal welfare recommendations and we would expect that related relevant policies should also take this on board.

4. What are your views on our intention to amend the school food and drink Regulations to enable caterers to provide a service which better supports secondary age pupils to make balanced and nutritious food and drink choices as part of their school day?

This is an important part of the amendments and we support this. Children at secondary school must be supported in learning how to make good choices. There should be restrictions on/healthier food provided in vending machines and school canteens etc., that pupils 'snack' on throughout the day. As above, there are wider influences outside the school that must also be tackled.

5. Do you have anything else you wish to comment on in relation to the nutritional content of food and drink provided in local authority, and grant maintained, schools in Scotland via the School food and drink Regulations?

Conclusion

We welcome the proposed amendments. Food and drink provided for our school children should be based on the most up-to-date nutritional advice. As our Food for Good Charter says, public service catering should provide fresh, healthy and sustainable food. Related relevant policies must be applied to ensure sustainability is a factor, including of course the public bodies' climate change duties. We recommend the Charter principles and we note that nutritional and dietary guidance is just part of a much wider approach to public health. This should include universal free school meals.

For further information, please contact:

Dave Watson,
Head of Policy and Public Affairs
d.watson@unison.co.uk

Fiona Montgomery,
Information Development Officer
f.montgomery@unison.co.uk

Mike Kirby, Scottish Secretary
UNISON Scotland, UNISON House, 14, West Campbell Street, Glasgow,
G2 6RX