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Children's Food Campaign

School Food Standards Consultation Response

Submission by Malcolm Clark, co-ordinator, Children's Food Campaign

Children's Food Campaign,

Sustain, Development House, 56 - 64 Leonard Street, London EC2A 4LT

The Children's Food Campaign wants to improve children's health and well-being through better food - and food teaching - in schools, and protecting children from junk food marketing. We are supported by over 150 national organisations (www.sustainweb.org/childrensfoodcampaign/supporting_organisations/). The Children's Food Campaign is co-ordinated by Sustain: The alliance for better food and farming and funded by the British Heart Foundation.

This submission was developed in consultation with Children's Food Campaign's supporter organisations. Representatives of fifteen different expert organisations attended a meeting hosted by the Children's Food Campaign on 2 April 2014 to discuss the revised standards, with a further six organisations submitting written responses in advance of that meeting. The views of Sustain's wider membership have been incorporated into this report, by taking consideration of Sustain's response to the British Food Plan, through joint work between the Children's Food Campaign, the Campaign for Better Hospital Food and the Sustainable Fish Cities campaign on the issue of government procurement standards, and through conversations with several of the Sustainable Food Cities, including the Brighton and Hove Food Partnership.

SUMMARY

We applaud the commitment to improving school food. Overall the revised draft school food standards, produced by the School Food Plan, are helpful in promoting healthy eating and building on the success of the existing standards.

However:

1. The revised food standards are neither as ambitious as they should be, especially on reducing sugar consumption, nor update some of the flaws in the existing standards.
2. They do not include other important quality standards which apply to food served in, for example, prisons, Whitehall and the armed forces (as part of mandatory Government Buying Standards), such as ensuring food is produced to at least British standards of production and fish is from verifiably sustainable sources. It is very disappointing that the recommendation in the School Food Plan headteachers' checklist [School Food Plan, p135] on encouraging use of sustainable fish has not made it onto the actual standards themselves. Likewise, a reference in the first draft of the standards [School Food Plan, p143] to encouraging caterers to meet Responsibility Deal pledges and Government Buying appears to have been dropped.
3. The standards are not mandatory for academies created between June 2010 and March 2014, which means that almost half of secondary schools in England won't

automatically be covered; relying instead on their governing board or academy chain voluntarily signing up to meet the standards.

4. We have not yet seen the details of how the standards will be effectively monitored.

We recommend that:

1. The wording and criteria of the revised standards are tightened up to ensure that the nutritional impact of the standards is as rigorous and effective as it can be.
2. The DfE support the proposals in the British Food Plan which is being guided by government appointee Peter Bonfield, and which - if backed by appropriate legislation - would help to improve food served in all public sector institutions, and especially schools and hospitals (for whom quality and nutritional standards are especially important, providing food for many vulnerable people), and provide an important public investment in British and sustainable food production.
3. Verifiably sustainable fish is included in school food standards, just as it is currently for food served to politicians, prisoners and the armed forces as part of mandatory Government Buying Standards.
4. The scope of school food standards is extended to include important ethical and environmental standards, to at least match those set for prison food.
5. New legislation is introduced to make the school food standards apply to all academies and free schools, not just some of them.
6. Proper monitoring of food standards is introduced, including that Ofsted would count the meeting of food standards towards the overall grade of a school; and/or the implementation of inspections – e.g. the beefing up council trading standards inspections.

COMMENTS ON THE NUTRITIONAL ASPECTS OF THE STANDARDS:

This section relates to the specifics of the one-page version of the revised food standards, and is a response to questions 1a, 1b, 2, 4a and 4b of the consultation.

General comments:

The draft food based standards are broad statements of intent and do not cover the practicalities encountered in schools. Thus we would have valued being able to review draft practical guidance alongside the draft food based standards, and also had further reassurance of how menu plans in practice adhere to the standards.

The clear and strong view of everyone we consulted regarding the revised standards is that they are not ambitious enough, and that the wording in some cases is currently too vague and allows too much 'wiggle room' on the number of times sugary and fatty can be offered. Given recent advice from the Chief Medical Officer and the WHO on further reducing sugar intake, and the evidence from both the existing and revised standards that children are struggling to achieve this, there is a real need to have tougher standards, especially for products containing sugar served in schools.

We also believe that the standards should apply even after 6pm, on those occasions when pupils are being provided a meal or snack at school later in the day.

We agree with the wording and spirit of all of the revised standards, except where we make specific references or recommendations, set out below.

Specific comments on the text of the draft school food standards:

Except where specifically stated, we are recommending that the following changes should be made to the actual standards – the one-page version and the statutory instrument which will implement them – and not just appear in the non-statutory guidance notes.

The preamble:

Amend final sentence to add reference to sustainability:

“Wherever possible, foods should be prepared in the school's own kitchen from fresh, locally and sustainably sourced ingredients.”

Fruit and vegetables:

Stronger push on fruit and vegetable intake

- Schools should be specifically encouraged within the standards to include vegetables and fruit as part of a composite dish, as well as – as the draft standards state - providing at least one portion of each as an accompaniment.
- Schools must only serve low sugar and salt baked beans, and should be discouraged from treating baked beans as a portion of vegetables.
- The majority of desserts provided during lunch time should be least 50% fruit measured by volume of raw ingredients.
- At least three different fruits and three different vegetables must be served each week, but schools should be encouraged to offer at least *five* – to ensure variety and enable pupils to try a greater range.

Foods high in fat, sugar and salt:

Closing the dessert loophole

Desserts, cakes and biscuits should not be allowed in unlimited quantities, nor for an unlimited number of times a week. Instead, desserts, cakes and biscuits should be strictly limited in maximum frequency, if not taken out completely from the allowed lunchtime foods list. There is a strong case for schools only to serve desserts, cakes and biscuits that contain at least 50% fruit measured by volume of raw ingredients. A lot of work has already been done on recipes that build fruits and vegetables into desserts, for example, carrot and beetroot cakes. At the very minimum, the standard should be stepped up so that puddings are fruit based at least three times a week.

Other changes

- Transfats from hydrogenated fat ingredients should be specifically prohibited; there is currently no mention of them in the standards.
- Salty and sugary ingredients should be limited – e.g bouillons and fruit concentrates.
- Breadsticks and savoury crackers should be low-salt only.

- Sugar and salt must not be available to add to drink or food by children.
- Sachets of table sauces should be limited per pupil, and provided only on request.

Meat, fish, eggs and beans:

Less meat-focused diet

There should be a greater promotion of a plant-based menu; or at the very least an “eat less meat” approach (whether through Meatless Mondays or other initiatives) – for both nutritional and environmental reasons. For example: ‘A portion of meat or poultry must be provided at least three times each Week’ in the draft standards could be replaced with ‘A portion of meat or poultry must NOT be provided on at least one day a week. A clause should be added into the standards to allow schools to only serve vegetarian food if they need and/or choose to.

There should be a limit on the amount of myco-protein (such as Quorn) that can be served as a vegetarian option to once or maybe twice a week.

(Sustainable) fish

Given the health benefits, the requirement to eat oily fish only once every three weeks is too unambitious. The recommendation should be to eat it more regularly, whether once a fortnight or weekly. And there should be a definition of oily fish (a much misunderstood term), which lists not only those fish that can provide the healthy oils, but also – for sustainability reasons – the species and provenance of fish to avoid and those to buy – based on conservation advice from the Marine Conservation Society.

An additional standard should be added encouraging the consumption of sustainably sourced non-oily fish, as there is no other mention of fish within the standards.

For guidance notes

- Vegetarian and special dietary needs children should have more than three different lunch options every week.
- Recommend guidance on provision of beans and lentils for vegetarians: The current standard could result in cheese being served twice a week and egg could be three times a week. This could result in a not-very-healthy balance of protein sources for vegetarian children, so beans and lentil dishes should also be encouraged as healthy sources of protein.
- Recommend having guidance for portions of cheese served each day.

Food provided outside lunchtime:

- Bacon butties should be limited to once a week because meat and meat products are the second highest contributor of salt intake in the UK diet.
- ‘Low sugar or plain yoghurt’ should replace ‘yoghurt’ in the standards.

For guidance notes

- Guidance should focus on healthier options at break times and introducing healthier tuckshops and/or vending machines – giving case studies and “smart swaps” and making reference to the good work on healthy vending already undertaken by the Health Education Trust.
- Guidance is also needed on portion sizes.

- Schools should be specifically encouraged to concentrate on providing healthier snacks. The stated allowance of serving malt loaf, bagels, currant and fruit bread, crumpets and tea cakes and English muffins sends a mixed message and should be reworded to stress lower-sugar and lower-salt versions of these products.

Discouraging use of the 'celebration' / 'occasional' loophole:

One of the aspects of food in schools we receive the most complaints about from parents, as well as health professionals, is the amount of unhealthy food for sale or offered to pupils on a regular basis via fundraising drives or school celebrations. In many primary schools, a PTA-run cake sale or similar fundraising initiative organised by a class is an almost weekly occurrence. In addition, the frequency of sugary and fatty foods at school celebration events and special activities is often far greater than the limited exceptions to the current standards were intended to cover. Confectionery and cakes are still used as reward or 'treat' items in many schools, further normalising the positive consumption of such products in an educational setting. It would be very valuable for strong and detailed guidance to be given on discouraging these practices and suggesting healthier alternatives for schools to follow.

Starchy food:

- Salt should not be added during cooking of starchy carbohydrates.
- Further clarification is needed to avoid starchy foods prepared in fat being served three times on the same day. For whilst there is a restriction in the draft standards on them being served a maximum of two days a week, there is no restriction on how many times during that day that they can be served.
- There should be a recommendation to provide a starchy food not cooked in fat or oil when a starchy food cooked in fat or oil is on offer.

Bread

- Bread should be wholegrain, and sourced from a supplier that complies with the Department of Health's / Food Standards Agency's salt reduction targets. Emphasis should be placed on the term 'wholemeal', as there are many misleading marketing terms attached to lower quality bread to give the impression of healthiness.
- Bread should not be the only source of extra food for hungry children. Bread is the highest contributor of salt intake in children's diets and therefore other sources of low-salt starchy foods should be provided for hungry children during the week.

The Real Bread Campaign recommends that the bread served in schools should:

- 1) be produced without the use of any artificial additives or processing aids.
- 2) support local employment and economy; with a preference for bought-in bread to be supplied by an independently-owned bakery that is as local as possible.
- 3) be wholemeal bread, or at least bread with a higher fibre and natural vitamin/mineral content higher than roller-milled white.
- 4) ideally have been produced from wheat that has been grown and milled as locally as possible to the point of serving.
- 5) have a salt content of 350mg/100g and no more than 400mg/100g (i.e. the Food Standards Agency's target of maximum 1% salt).
- 6) be produced without the use of added fat or sugars, except for enriched breads such as brioche or focaccia.

Source: www.sustainweb.org/realbread/on_the_menu/

For guidance notes:

- Greater promotional efforts are needed to let pupils know what is provided as extras to fill them up.

Healthier drinks:

Lunchtimes versus break times

- Standard dietary and dental advice is for children to drink only water between meals – this needs to be reflected in the standards.
- Fruit juice, unsweetened combos or fruit juice/milk/enriched drinks should only be provided at mealtimes, not during other breaks.

Reducing sugar consumption

- Flavoured milk should not be encouraged to be served in schools, even if it contains less than 5% sugar, as in a 200ml milk drink this will equate to 10g of sugar. Children are already used to drinking unsweetened milk from a young age.
- 150ml servings of fruit juice should be limited to one per child, however the practical implementation of this may be difficult.

Caffeine-free schools

- No tea or coffee should be served to children in schools. The provision of caffeine is not appropriate for primary age group and components within tea and coffee inhibit the absorption of iron, which may have an impact on this population group.
- Hot chocolate, if offered, should be low calorie, and preferably a selection of pure herbal / fruit teas should be made available instead.
- All hot drinks can, however, be made available to adults. As many of these are made with important commodity crops from low-income countries, a commitment to Fairtrade products (e.g. coffee, tea, hot chocolate and sugar) should be included.

The guidance for vending in Welsh hospitals offers some useful additional standards for healthier drinks which should be incorporated into the revised school food standards:

- (i) Foods and drinks should not be harmful to teeth, and should not contain added sugar.
- (ii) Drinks must not be carbonated and should have a pH greater than 4.5; but plain water may be carbonated because carbonated water has negligible erosive potential.
- (iii) Pure fruit and vegetable juice diluted with still or carbonated water should only be allowed when it contains, following dilution, a minimum of 50% fruit or vegetable juice (which is higher than the 45% minimum stipulated in the draft standards).

For guidance notes

- Request guidance to be included on the provision of artificially sweetened drinks. There seems little reason why artificially sweetened products should be widely available in schools, as all they do is reinforce a taste for sweet food and drink.

Additional areas to be covered by guidance:

- A larger number of staff are needed to ensure children are eating the correct portions.
- Guidance for vegetarian schools and for serving vegetarian and vegan pupils. For example, an alternative to fish should be explicitly included to ensure healthy essential fatty acid intakes for vegetarians, vegans and others who do not eat fish.
- Likewise for those with special dietary needs. For instance, gluten-free bread presents a challenge as such products are often higher in fat than normal bread. Children with food allergies and intolerances should always have more than one option made available to them.
- The food based standards will need appropriate portions guidance to ensure that the nutrient based standards are met. Although portion guidance will be provided with the practical guidance, providing appropriate sized portions should be a compulsory aspect of catering practice. There was also some discussion as to whether the age ranges for portions (5-11yr & 12-18yr) are too broad.
- Guidance for providing a balanced plate of food for children.

This section relates to question 5 of the consultation.

ACADEMIES:

As part of the Save Our School Food Standards campaign, the Children's Food Campaign has already contributed to a response to this consultation about the continuing exemption of a large number of academies, which is indefensible for 'national' food standards. That submission was backed by the Jamie Oliver Foundation, School Food Matters and the Food for Life Partnership, as well as the Children's Food Campaign (which in turn has 150 supporting organisations). We feel it is worth restating the key points from that submission:

We are pleased that from March 2014, newly established academies will have to comply to mandatory standards to comply with their funding agreements. However, as there has been uncertainty around whether school food standards are mandatory for all schools, we feel it important that the guidance reiterates that from January 2015 all schools should comply, whether or not it is mandatory for them to do so.

Despite new regulation on standards, there is still a large number of academies - those opened between May 2010 and March 2014 - that are not obliged to comply. Luckily, some of these are covered by the voluntary Food for Life Catering Mark and others have volunteered to comply. However, there currently remain over 3,000 schools that will not be required to adhere to the school food regulation. Whilst securing voluntary letters of agreement is a process that we will continue to support as an interim measure, we consider this to be a temporary measure and have concerns about the longevity and verification of such voluntary agreements. Our long experience indicates that economic forces are stronger than voluntary commitments, and that unless obliged to do otherwise, schools with limited budgets will always be tempted to save money on everyday expenses such as catering, and to install or allow income-generating opportunities such as junk-food vending machines, junk-food tuckshops, or junk-food sponsorship of equipment.

We would urge the DfE to include a section within the guidance that stresses the importance of standards and reiterates the conclusion of the School Food Plan that: *"Compulsory, rather than voluntary, standards are proven to help schools ensure that children get the nutrition they need across the whole school day."* (page 143)

In the longer term, we will invite the political parties to include a commitment within their 2015 election manifestos to address this gap in the regulation of academies.

MONITORING

We are pleased that the importance of effective monitoring of standards has been reflected in the School Food Plan and that a mechanism for monitoring is theoretically in place. But we would like to see much more concrete proposals before our current concerns on the monitoring of the standards are alleviated.

Ofsted

As Ofsted underpins the behaviours and cultures adopted by schools, Ofsted should be encouraged by the DfE publicly to support the importance of school food as this would change perspectives and priorities. A further improvement would be if Ofsted did not rate a school as outstanding unless its food was meeting all food standards. This could also be extended to cover food growing and food education so that schools are rewarded for their whole-school approach to food.

From this September, nearly £1 billion is to be spent on school food. Ofsted currently report on £2.5 billion of Pupil Premium spend, so there is already a precedent for Ofsted to monitor large government expenditure. There are approximately 20 areas of commonality across school food that could be measures for monitoring. These include quality of provision, curriculum, community involvement, wellbeing, use of technology, procurement and others.

If Ofsted – as it seems so far – is unwilling, unable or lack skills to monitor this area, an independent board aligned, or reporting to Ofsted and DfE should be set up. Alternatively, council trading standards departments should be given increased resources to carry out such inspections and to receive appropriate training, so they can work with more schools, and do so more frequently than at present.

Other forms of monitoring

School Food should already be monitored by existing local authority services but could be bolstered by a national quality framework and recognised award/kite mark. The precedent has now been set that (new) academies and free schools should also have to reach food and framework standards, and this should be extended out to include the inspections process.

Guidance to schools

We would recommend that the guidance makes clear that the DfE will be visiting a sample of schools each year to check on compliance and explain what action will be taken if schools are failing to comply. We would also welcome additional measures by which the DfE can monitor and give advice to those academies that have voluntarily agreed to meet the standards.

As food and health criteria were lost from the Ofsted framework of inspection in 2012, we would recommend that the guidance emphasises that inspectors will be considering the lunchtime experience and health when visiting schools. It would also be useful for schools to understand how inspectors will be measuring performance within this category. As standards will be mandatory from January 2015 in all maintained schools and new academies, we believe that it would be sensible for inspectors to ask for evidence of compliance when inspecting.

DfE should also consider advising schools that a percentage of Pupil Premium can be used for food and wellbeing related activity specifically for free school meals.

SUSTAINABILITY

In addition to the specific comments on sustainable fish addressed in the nutrition section of our submission, we remain very concerned that sustainability has not so far been integrated into the school food standards and consider this a major omission.

We think it is helpful that Food for Life (Catering Mark and Partnership – both of which integrate both nutrition and sustainability in catering standards) will be promoted and will receive extra funding through the School Food Plan process, and that there will be encouragement in the guidance to headteachers to consider sustainable sourcing. We hope that, when preparing the guidance, the School Food Plan and DfE will work with Defra, along with NGOs with expertise in this area, to ensure that the school food standards are aligned with the Government Buying Standards as a minimum in relation to sustainable food, and that accreditation schemes, such as the Food for Life Catering Mark, are recommended for further quality assurance.

But we this is not the same as a cross-government consistent approach to applying health and sustainability standards, in tandem, as set out in the British Food Plan, which is a development from mandatory Government Buying Standards already in place for Central Government, HM Prisons and parts of the armed forces. And it is not the same as sustainability being integrated into school food standards as a requirement, and hence being subject to such legal measures as legislation and the new binding clauses in the funding agreements for new academies. That is what we would like to see, as a matter of priority for the long-term sustainability of our food system.

Children's Food Campaign
16 April 2014

Please can you acknowledge receipt of this submission by responding to malcolm@sustainweb.org