

Comprehensive Spending Review 2020: Five proposals to improve children's access to healthy food.

Children's Food Campaign

Children's Food Campaign (CFC) aims to improve children and young people's health by campaigning for policy changes in our schools and communities that promote healthy and sustainable food environments. Children's Food Campaign is part of Sustain, the alliance for food and farming, and is supported by over 100 UK-wide and national organisations, including children's and health charities and professional bodies, trade unions, school food experts and environmental organisations.

Sustain, the alliance for food and farming

Sustain is the UK alliance for better food and farming. We represent around 100 not-for-profit national organisations and many more at local level. During the Covid-19 pandemic, Sustain and its member organisations have been supporting community groups, food enterprises, food aid groups, schools and their caterers, local authorities, and government and industry liaison on the emergency food response. Sustain campaigns include the Food Poverty UK network, Food Power, Sustainable Food Places, Sugar Smart UK and Veg Cities.

Introduction

All children have the right to a healthy and happy childhood, including access to nutritious, affordable and culturally appropriate food. The Covid-19 emergency has further exposed the levels of food insecurity, as well as risk of overweight and obesity, and the need for renewed action to deliver a more equitable and healthy food environment for families.

The Sustain alliance is calling on the Government to take action on these five following areas during the Comprehensive Spending Review in autumn 2020 in order to improve our children's health. The recommendations here both endorse and build further on those advocated in the National Food Strategy and wider coalition of organisations supporting increased funding for children's food programmes.

1. Maintain and extend the Soft Drinks Industry Levy to drive investment in children's healthy food.

The Soft Drinks Industry Levy, which came into force in April 2018, has widely been praised for the impact it has had in triggering a 28.8% reduction in sugar levels of soft drinks, according to Public Health England (PHE). This compares to just 2.9% lowering of sugar in other product categories covered by the voluntary sugar reduction programme, which is due to come to an end in 2021. A review of the Soft Drinks Industry Levy, including consideration of extension to the milk-based sugary drinks currently exempted, was promised in 2020 if companies did not achieve significant voluntary sugar reduction of these drinks. Whilst the current Covid-19 crisis has both disrupted the out-of-home soft drinks sector and led to a postponement of new sugar reduction figures, there is solid evidence from Action on Sugar that many milk-based drinks have not been significantly

reformulated in the past two years. Meanwhile, independent research published in February 2020 notes that, while the overall percentage of drinks with more than 5g sugar fell from 49% to 15% from 2015 to February 2019, “After the implementation of the SDIL, we observed a peak in the proportion of intervention drinks with a sugar level between 4.5 and 5.0 g per 100 mL (see [S5 Appendix](#)), suggesting that many manufacturers chose to reformulate to just below this threshold.”¹ There is therefore potential to leverage further reformulation by adjusting the lower threshold from 5g to 4.5g (or lower still). Under the Nutrient Profile Model currently assesses any sugary drink with more than 4.5g sugar per 100ml scores 1 point, and drinks with 1 point are considered HFSS products, subject to advertising restrictions. Aligning the levy with the 4.5g threshold in the Nutrient Profile Model would therefore provide a consistent threshold across policies designed to reduce sugar and incentivise reformulation. Whilst incentivising the reformulation of drinks was the primary objective, the introduction of the levy was also accompanied by a commitment to use revenue raised to increase investment in children’s health. Despite the initial Office for Budget Responsibility income forecasts from the levy being revised following greater reformulation of products than originally envisaged, the Government pledged that the amount to be ringfenced to children’s health investment for these purposes at £575m in 2018-19 and that the amount schools would receive would not fall below £415m per annum for the remaining period of the Comprehensive Spending Review². Following the postponement of the CSR in 2019, HM Treasury confirmed that this commitment had been rolled over in the November 2019 Spending Round. In 2018-19, levy income was allocated towards doubling the Primary PE & Sport Premium (from £160m to £320m), establishing a National School Breakfast Programme (up to £26m over two years, later extended for 2020-21 by another £11m), a one-year Healthy Pupils Capital Fund (£100m), the Essential Life Skills programme (£22m over two years). Since 2019 however, the Department for Education has failed to publicly account for this money despite repeated requests. We are therefore calling on the Government to use the Comprehensive Spending Review to announce a new multi-year Healthy Food Innovation Fund for schools, similar to the previous Healthy Pupils’ Capital Fund to enable schools (and/or local communities working to improve on children’s health, food environment and wellbeing) to invest in infrastructure, project innovation – from new cookery or kitchen facilities, growing spaces, food and nutrition programmes, new food activity clubs etc. Whilst we acknowledge the valuable role of PE and Sports in maintaining children’s overall health and fitness, professional expertise is unanimous that you cannot outrun an unhealthy diet, and that maintaining a healthy weight is likely to be 80% food/diet-related and 20% exercise. We therefore call on the Government to commit a minimum of 50% of forthcoming SDIL receipts from the SDIL to the new healthy food fund.

¹ Scarborough P, Adhikari V, Harrington RA, Elhussein A, Briggs A, Rayner M, et al. (2020) Impact of the announcement and implementation of the UK Soft Drinks Industry Levy on sugar content, price, product size and number of available soft drinks in the UK, 2015-19: A controlled interrupted time series analysis. *PLoS Med* 17(2): e1003025. <https://doi.org/10.1371/journal.pmed.1003025>

² 6 December 2018, Government Finance Bill debate, comments from Robert Jenrick MP on behalf of Government.

We note that the SDIL is not currently indexed to inflation. Given evidence that the introduction of the levy in itself has not had an adverse effect on the Soft Drinks industry's overall sales and profits, we call on the Government to uprate the levy for 2021/22 onwards, either at or above inflation rates, to continue incentivising healthier product formulations.

Given the positive impact of the Soft Drinks Industry Levy in accelerating product reformulation and shifting focus of promotion and advertising towards low and no-sugar drinks, whilst voluntary reformulation programmes have lagged behind, we call on HM Treasury to consider extending use of fiscal measures (including further business levies, tax incentives or VAT reform), in support of healthy food and drink innovation, and the Government's strategy to reduce childhood and adult obesity rates.

Recommendation 1:

- Maintain and further expand the **Soft Drinks Industry Levy** to incentivise further product reformulation and extend to include milk-based sugary drinks (on the basis of sugar or total calories).
- Ensure SDIL revenue, currently forecasted to generate £340m per annum for 2021-24 by the Office for Budget Responsibility, is invested in establishing a new multi-year children's healthy food fund for schools (and/or local communities).
- Lower the applicable threshold for eligible drinks to 4.5g per 100ml in order to incentivise further reformulation and maintain revenue income, and bring it into line with the current Nutrient Profile Model on HFSS food and drink, and increase the levy rate in line with (or above) inflation.
- Consider further application of fiscal measures beyond the Soft Drinks Industry Levy with the objective of incentivising business food and drink reformulation towards healthier public purchasing and consumption.

2. Give more children a Healthy Start

The Government's Healthy Start scheme aims to help low-income pregnant women and households with children under the age of four to buy fruit, vegetables, milk and infant formula, and universally applies to all pregnant women and mothers under the age of 18. At present, it provides £3.10 per child per week, and double that for babies up to 12 months. The value of the voucher has not changed since 2009, and has fallen behind Scotland's Best Start scheme which provides vouchers worth £4.25 per week.

Uptake of the scheme also remains low, and fell from 55% to 48% from July 2019 to July 2020³. Sustain has been working with local public health bodies, food partnerships, associations of midwives and health visitors to build good practice in promoting the scheme and boosting registration, including a toolkit for practitioners published in 2019⁴. The recent National Food Strategy has estimated that extending eligibility for the scheme to all pregnant women and all households with children under 4 who are in receipt of Universal Credit or equivalent benefits would increase eligibility to one million women and children. It estimates that this could in turn bolster uptake of the vouchers by 290,000 to take the total number of beneficiaries to an estimated 540,000

³ <https://www.healthystart.nhs.uk/healthy-start-uptake-data/> Accessed 10 August 2020

⁴ https://www.sustainweb.org/publications/making_the_most_of_healthy_start/

per year⁵. This is estimated to cost an additional £110 million per year. In addition, it recommends investment of an additional £5 million per year for a communications campaign to support uptake of the vouchers. Sustain has called for more acceleration of plans to digitise the application process and introduce smart cards, which would ideally both improve take up of the scheme and reduce stigma for users of the vouchers. We also strongly support the recommendation for more investment in communications and promotion of the scheme, which should include working with local public health teams in order to ensure materials meet their needs for working with families of diverse backgrounds. This should also include targeted work with market traders to ensure they are prepared for the introduction of smart cards and can still serve their customers, along with other traders who traditionally serve more diverse customer groups.

We welcome that the Co-op, Waitrose and Iceland have agreed, in principle, to supplement these vouchers with additional free fruit and vegetables in support of the National Food Strategy recommendations, but we suggest that supermarkets and convenience stores prioritise fruit and vegetables that are seasonal and grown in the UK to higher environmental standards to support British farmers and traders and help the economy.

Recommendation 2:

- Invest an additional £110 million per year to increase the value of **Healthy Start vouchers** to £4.25 per week (in line with Best Start in Scotland), and index the value so they continue to reflect real food prices.
- Expand eligibility to every pregnant woman and all households with children under 4 where a parent or guardian is in receipt of Universal Credit or equivalent benefits.
- Accelerate digitisation of the service, including an online application process and smart card for purchases, to improve take up and reduce stigma.
- Invest an additional £5 million in a targeted promotional campaign to improve take up of the vouchers and to ensure diverse retailers, including independent stores and market traders, encourage their use.
- Encourage retailers to prioritise fruit and vegetables that are seasonal and grown in the UK to higher environmental standards when supplementing healthy start vouchers with free fruit and vegetables

3. Expand the School Fruit and Vegetable Scheme to all primary school children

According to the National Diet and Nutrition Survey, adults and children in the lowest-income households eat on average 42% fewer vegetables and fruits than the recommended amounts. In the weeks that followed the initial Covid-19 lockdown, 72% of families in receipt of free school meals reported they were concerned about being able to afford fruit and vegetables. Between 2012-2016 the average number of portions of fruit and vegetables eaten by children was 1.7, compared to the recommended minimum 5-A-Day. 33% of 5-10 year olds ate less than one portion, and 94% ate fewer than 3.5 portions of fruit and vegetables per day. Children in the least affluent households are three times as likely to eat less than one portion of fresh fruit or vegetables per day. Research also

⁵ National Food Strategy, Part One, p.90 <https://www.nationalfoodstrategy.org/wp-content/uploads/2020/07/NFS-Part-One-DP.pdf>

showed that during lockdown around a significant drop in the amounts of fruit and vegetables consumed by around half of children normally in receipt of free school meals⁶.

The National School Fruit and Vegetable Scheme currently provides around 2.3 million children aged 4-6 in approximately 16,300 state-funded primary schools with an additional portion of fruit or vegetables on every school day. Although the scheme was suspended during the recent Covid-19 lockdown, the Government has committed to reinstating it in all primary schools when they reopen in September 2020. Evidence shows the scheme has a positive effect in increasing children's overall fruit and vegetable consumption, but that this effect drops off when children move into the next year group and no longer access the scheme. The scheme is co-managed by the Department for Education and the Department of Health and Social Care, and is administered via a procurement process managed by the NHS Supply Chain programme. It is estimated to cost around £40 million per year, and therefore extending the programme to all 4.7 million children currently attending primary school would roughly double the cost to around £80 million per year, and embed fruit and vegetable consumption habits over the full 6 years of primary school, likely resulting in a much stronger impact on long-term food preference and consumption patterns. In particular it would provide a fruit and vegetable 'safety net' to complement free school meals for children in the most food insecure and lower-income households, and help to close the gap on food health insecurities. It would additionally provide the wholesale fruit and vegetable sector, which has been hard hit by the Covid-19 lockdown closures in the education sector and wider out-of-home industry, with additional supply chain opportunities, and should also, using careful procurement guidelines, support local and British fruit and vegetable producers, produced to higher environmental standards, at a time of uncertainty due to changes in international trade relations.

Recommendation 3:

- Invest an additional £40 million (or total of £80 million) in order to expand the **School Fruit and Vegetable Scheme** to all children in state funded primary school to level off some of the inequalities in access to fresh fruit and vegetables and tackle low levels of fruit and veg consumption by children.
- Increase the proportion of British seasonal fruit and vegetables produced to higher standards such as organic or LEAF (Linking Environment And Farming) mark to support British farmers and traders and help the economy.
- For any fruits or vegetables imported from tropical origins (bananas, pineapple), apply best practice environmental and ethical production and trade standards e.g. Fairtrade.

4. Expand eligibility for Free School Meals

Hungry children struggle to study and achieve. For many children living in households affected by low or unpredictable income and food insecurity, their school lunch may be their only proper meal of the day during term time. There is a good body of evidence on the positive impact of a healthy and nutritious meal on children's levels of concentration, behaviour and educational attainment, as well as on their mental health and overall wellbeing, ability to participate in physical activities. Following months of lockdown due to Covid-19 it has never been so important to ensure all children who have experienced high levels of food insecurity, stress and anxiety, are able to access a nutritious meal when they return to school.

⁶ <http://newsroom.northumbria.ac.uk/pressreleases/massive-decrease-in-fruit-and-vegetable-intake-reported-by-children-receiving-free-school-meals-following-lockdown-3005719>

Free School Meals are currently provided to all children for the first three years of primary schools (Reception, Years 1 and 2) under the Universal Infant Free School Meals scheme. From Years 3 to 12, children are only eligible to continue free school meals if they are in receipt of Universal Credit, and since April 2018 this is further restricted to households in receipt of net income below £7,400 before benefits are applied. In practice this means that millions of children in households coming under the Government definition of poverty are no longer eligible for Free School Meals. It is estimated that removing the income threshold so that all children up to 16 years old from households in receipt of Universal Credit or equivalent benefits would mean that an additional 1.5 million children would benefit, at an additional cost of £670 million per year. However, we would also call on Government to take into account the following factors:

- The value of Universal Infant Free School Meals has not increased from £2.30 per meal since their introduction in 2013. Whilst it may be possible for larger schools and multiple consortiums to provide meals without making a loss, there is evidence that this is not sustainable especially for smaller schools, those with in-house catering teams or seeking to procure more seasonal, local and higher welfare and environmental standards, in line with the NHS Eatwell Plate. The Local Authorities Catering Association (LACA) has advocated increasing the allowance to £2.51 per meal, whilst the Soil Association Food for Life Programme estimates that if the UIFSM cost had risen in line with inflation each year it should now be paying £2.70-2.80 per meal⁷. Ensuring school meals are adequately funded would not just support schools, it would also provide a much-needed boost to the school catering sector and food wholesale distribution networks who were hard hit during lockdown, providing a viable business model to enable them to build back better.
- At present eligibility for free school meals is available to pupils of all ages who qualify through benefit-related entitlements, and this should continue to be the case. The government should ensure any eligible children over the age of 16 continue to be able to access free school meals whilst they remain in education.
- Prior to the Covid-19 emergency, children from households with No Recourse to Public Funds were not eligible for Free School Meals, despite evidence that these include many children experiencing the most acute forms of poverty, exclusion and food insecurity. The Government recognised this injustice by temporarily extending eligibility to certain categories of children from households with NRPF, including access to the Covid Summer Food Fund. Sustain's Right to Food campaign, along with many other organisations working on food insecurity, poverty and immigration rights, are calling for extension of eligibility to be made permanent as part of future policy and budget spending plans.

Recommendation 4:

- Invest £1 billion per year in expanding **eligibility for Free School Meals** to include every child still in full-time education from a household where the parent or guardian is in receipt of Universal Credit or equivalent benefits.
- Expansion of the Free School Meal programme should be in addition to the Universal Infant Free School Meal programme, which must be retained as a vitally important mechanism for protecting the diets of young children.
- The definition of 'equivalent benefits' should include extension to children in households with No Recourse to Public Funds (NRPF) who meet the same eligibility criteria, adjusting income levels to ensure equal access, and should encompass both categories of NRPF family

⁷ <https://www.foodforlife.org.uk/whats-happening/state-of-the-nation>

covered by the temporary Covid extension in eligibility and other categories of NRPF families, including undocumented children and low-income migrant households.

- Increase the payment per meal from £2.30 to at least £2.51 in the current Comprehensive Spending Round, so that schools and caterers can ensure school food can meet upgraded healthy school food standards, supports high standards of nutrition, animal welfare and environmental production, and is in line with the NHS Eatwell Plate.
- In the longer term, the Department for Education should work towards provision of universal free school meals in line with school food nutritional standards for all primary school children.
- Beyond school lunches, we further encourage the Government to build on the success of the National School Breakfast Programme by establishing legislation to enable all state-funded schools with evidence of significant need (eg 50% of all pupils in bands A-F according to the IDACI index) to provide a free healthy breakfast to all pupils each day, and require the Department for Education to provide necessary resources to achieve this.

5. Expand Holiday Activity and Food Programmes across the whole of England

Hunger does not recognise school term dates. For many children in receipt of Free School Meals, their school breakfast or lunch may be the only healthy food they receive each day. During school holidays, many families experiencing food insecurity or with low or unpredictable income, may struggle to afford and access healthy food for their children. Whilst 1.3 million children in England are currently eligible for Free School Meals, an estimated 3 million children are estimated to be at risk of hunger during the summer holidays. In contrast, the Department for Education's Holiday Activity and Food Programme currently only reaches an estimated 50,000 children in 17 local authorities, at a cost of £9 million per year – this figure represents around 35% of all the children that would be eligible for participation in these programmes in the funded local authorities.

According to figures from the Department for Education, a further 52 applications covering 71 local authorities were rejected for the 2020 Holiday Activities and Food Programme which together were aiming to reach a further 240,300 children⁸. It is clear that the scale of need during school holidays far outweighs the current levels of provision and available funding to ensure no child goes hungry whilst schools are closed. According to the Department for Work and Pensions, there were 4.2 million households on Universal Credit in May 2020, an increase of 1.7 million since February 2020⁹.

In summer 2020, the Government established a new precedent by providing vouchers worth £15 per week to every child normally in receipt of free school meals during the Easter Holidays, Whitsun half term week and the six weeks of the school summer holiday. However, this delivery mechanism was an emergency response only. The recently published National Food Strategy has called for Holiday Activity and Food Provision to be extended to the whole of England, and has estimated an additional investment of £200 million might be required to extend the programme nationally, and reach an additional 1.1 million children. The most effective delivery model for scaling up holiday provision nationwide would be to distribute resources via local authorities, using a funding formula drawing on existing data regarding levels of children eligible for Free School Meals in each area. The formula

⁸ Response to Children's Food Campaign Freedom of Information request to the Department of Education, received 17 July 2020, and follow up correspondence. The figures for children omit three applications for which no figures for estimated child reach were supplied by the applicant organization/local authority.

⁹ <https://www.gov.uk/government/publications/universal-credit-statistics-29-april-2013-to-9-july-2020/universal-credit-statistics-29-april-2013-to-9-july-2020#people-on-uc-header>

would also set minimum expectations around service provision, quality, monitoring and evaluation. Delivering in this way would allow for food and nutrition to be prioritised by the programme while allowing flexibility to be retained for locally tailored provision and wrap-around care to be sustained through partnerships with schools/caterers/NGOs and others. Scaling up the existing HAF approach would require a minimum of £6 per day per child for 16 days over the holiday period (4 days per week for 4 weeks) - at this rate, increasing the programme from the current £9 million to £200 million would allow local authorities to make provision available for almost 2.1 million children. Local authorities could also bolster this funding through other local partnerships to ensure the safety net and wrap around care during the holidays.

Recommendation 5:

- Invest a minimum of £200 million per year during the next period of the Comprehensive Spending Review to extend **Holiday Activity and Food** funding to all 232 local authority areas in England, so that a minimum of 16 days (4 days per week for 4 weeks) holiday support is available to all children in receipt of Free School Meals.
- Consider making this programme available via a funding formula based on eligible pupil numbers in each local authority/, to be deployed into an appropriate mix of holiday activities and food programmes, and make provision for other emergency supplementary food, voucher or cash payments where children are not able to participate in programmes but may still be at risk of hunger.
- Initiate a national/ consistent monitoring and evaluation programme to ensure effective use of the holiday premium for the purposes for which it is intended.
- Commit the Department for Education and participating local authorities and schools to a further review at the end of the current Comprehensive Spending Review period, with the aim of extending a full year wrap around food and activity support programme, applying best practice and learning in use of funds.

For more information, contact:

Barbara Crowther, Coordinator, Children's Food Campaign, barbara@sustainweb.org

Ben Reynolds, Deputy Chief Executive, Sustain, ben@sustainweb.org