London Food Link’s response to the Mayor’s Health Inequalities Strategy Consultation

About London Food Link

This response is from London Food Link, part of the charity Sustain. London Food Link is the voice of good food in London and has worked in the capital for over 12 years building the understanding of the role good food can play in strengthening communities and the economy, as well as ensuring people understand the impact of the food system on our environment. Amongst our influential projects and campaigns are:

- **Good Food for London**: Our annual report in its seventh year compares local authority commitments to good food measures, including Food for Life served here and Living Wage and ranks them in a league table.
- **Beyond the Food Bank**: Our annual report in its third year compares local authority commitments to tackling food poverty.
- **Capital Growth**: London’s food growing network, which supported over 2000 new community food gardens in parks, schools and on housing estates, engaging over 200,000 people in growing fresh, healthy food.
- **Children’s Food Campaign**: Has spearheaded the work on a Sugary Drinks Levy, Junk Food Marketing restrictions and getting junk food off the checkouts of 50% of supermarket outlets
- **Food Power**: working to alleviate food poverty by calling on Governments across the four nations to tackle the root causes such as low pay, as well as to improve and protect publicly-funded nutrition programmes. We are launching a related programme to support local food poverty alliances across the UK including in London.
- **SUGAR SMART**: A campaign of Sustain and the Jamie Oliver Food Foundation encouraging local authorities, organisations, workplaces and individuals to reduce the amount of sugar we all consume.

Our response

London Food Link is pleased that the Mayor has created a Health Inequalities Strategy and is taking active steps to address the main issues that lead to inequalities in the health of different groups of Londoners. We support the inclusion of certain key factors that influence access to healthy, affordable food such as early years, breastfeeding and the availability of healthy food choices lower in saturated fat, salt and sugar and higher in beneficial components such as fruit and vegetables.

We recognise that the Health Inequalities Strategy is being developed in parallel to many other strategies that food and food systems impact on and vice versa. We strongly advocate, that due to the interdisciplinary nature of food that the London Food Board and the London Food Strategy should remain as the overarching way to deal with the integration of these issues into other areas, for mutual benefit. The London Food Strategy can show how joined-up thinking across traditional ‘divisions’, such as environment and health, can provide solutions to the complex challenges our city faces, addressing economic fairness and social justice.
Food issues cover a wider remit than health, and therefore should not be siloed only into health. However, we do feel that food and health have such strong linkages that more recognition of food, particularly in tackling diet-related illness such as diabetes and obesity and in respect of creating a city with healthy children, places and communities, is needed within the Health Inequalities Strategy and the positive actions that would flow from this.

In particular we believe the strategy needs to show strong leadership on key food and health issues provide more detailed action on the following:

1. **Tackle holiday hunger** as part of securing children’s access to food 365 days a year. The Mayor has a real opportunity to improve people’s lives with a coordinated plan for weaving good food into holiday food provision.

2. **Focus on school food:** Whilst much has been done to improve school food, it is still the most important point where intervention can be made in improving children’s diet and appreciation and understanding of food, and there is a danger in slipping back on the progress to date. Much work has focused on primary, and a new approach targeting teenagers, championed by the Mayor could really improve childhood obesity.

3. **Widen out the definition of healthy streets** to explore what healthy high streets could look like, incorporating access to drinking waters, diverse retail, particularly on food and limits to fast food takeaway particularly in areas of deprivation.

4. **Improve Meals on Wheels and food for older people.** The Mayor’s leadership could rally this neglected sector to make more efficient use of local council budgets and relieve the burden of malnutrition and social isolation on the NHS, with better coordination and collaboration between London boroughs and a focus on the potential role for social enterprises.

5. **Promote levies on the price of junk food/junk food marketing.** The proceeds of this could be redistributed to promote alternative healthy choices. This could build on the City Hall café being the first Government building to sign up to the voluntary Sugary Drinks Tax (raising money for the Children’s Health Fund). This could be more widely promoted, with similar levies explored on junk food advertising on GLA family/TFL property.

6. **Ensure the planning system is prioritising good food.** London could lead the world in restricting junk food outlets/promotion, and ensuring that new developments embed the alternatives e.g. land and protected designation for community food growing, water refill/fountains, healthy food retail.

7. **Ensure widespread access to tap water in public places.** Through community crowdfunding, corporate partnerships, and levies above, a new wave of water fountains/refill points could sweep the capital, providing an environmentally friendly alternative to sugary drinks – the largest contributor of sugar in children’s diets.

8. **Join/promote the SUGAR SMART campaign** to reduce sugar in organisations and businesses with a London-wide presence and reach out to more Londoners about the dangers of too much sugar.

9. Develop an integrated approach to obesity that reinforces efforts to improve the environmental, social and economic impacts of our food supply, and contributes to a resilient and socially just food system.

Below we highlight the key areas where food can play a vital part in reducing health inequalities.
Healthy Children

Is there more that the Mayor should do to reduce health inequalities for children and young people?

London Food Link is pleased that the Mayor has included some very important factors that can reduce health inequalities amongst children such as free school meals, breastfeeding, and early years. However we believe the section on healthy children needs more mention of food poverty.

Food poverty has many interlinked causes and cuts across a number of policy areas including health inequalities. Low pay, inadequate welfare support or long term illness, combined with high housing and travel costs can condemn families to chronic hunger, poor nutrition and anxiety. To combat this we recommend that the Mayor include these specific food poverty reduction measures in his strategy.

1) Encourage councils to engage with existing food and nutrition programmes that focus on reducing food poverty and improve children’s health such as:
   a) Holiday hunger and securing children’s access to food 365 days a year: School meals are a critical safety net for low-income children. Free school meals help tackle child hunger and boost attainment, especially for the poorest children. This is especially so for children who go hungry during the holidays because they are unable to get a balanced diet due to squeezes on their families budget. To tackle this, the Mayor should not only champion efforts to give children 365 days a year access to food but tackle the stigmatisation and social exclusion that discourages parents from registering their eligible children for free school meals.
   b) Increasing the uptake of Healthy Start: Healthy Start aims to provide a nutritional safety net and to encourage healthy food choices. Yet in 2017 its take up rate ranged between 56% to 75% across 30 of London’s boroughs, meaning that over 22,000 households were missing out on Healthy Start Vouchers. The Mayor should ensure that local authorities, who are best placed to increase uptake, have the resources to recruit a designated Healthy Start Coordinator and create an integrated programme of activities to reach a minimum local uptake of 80% and therefore tackling some of the economic barriers to healthy diets.
   c) Improving the quality of school food. Whilst much has been done to improve the healthiness and quality of school food nationally, with initiatives such as the school food plan, there is still much room for improvement. In particular we want to see “Healthy Schools” and “Food for Life Served Here” standards maintained and increased across more schools. More should be done to educate children about good food and a healthy diet at primary school – through growing and cooking as well as weaving it into other elements of the curriculum, but this needs to be reinforced by the food environment our children are exposed to. The
challenge is also greater for secondary schools, where many academies do not have to meet the school food standards, and many other schools have made little attempt to ensure their children have a healthy diet – either through the food served on or off-site. There needs to be more encouragement that school governors do their duty to take responsibility for monitoring and upholding school food standards. In order to improve uptake of free school meals, councils should be encouraged to make the process of registering as simple and destigmatized as possible.

2) The Mayor should ensure every borough has a food poverty action plan. This plan will bring together statutory and non-statutory partners to develop a coordinated and sustainable response to food poverty and its underlying drivers. We also believe that Mayor could take leadership by developing a London-wide Food Poverty Action Plan, along the lines of the Fuel Poverty plan suggested in a later chapter.

How can you help to reduce health inequalities among children and young people?

Sustain, through our London Food Poverty Campaign, works with local councils to build their capacity to address food poverty. We can help local councils and the organisations that GLA has awarded contracts to engage with existing policies aimed at tackling food inequalities and improve their performance on them.

We champion local policies and initiatives and measure these through the annual Good Food for London and Beyond the Food Bank (see below) reports that track London Borough progress on key actions to improve health and sustainability through food, and household food insecurity, through mechanisms under local authority control.

We would be keen to work with the Mayor to suggest ways to improve school food across London.

What should be our measures of success and level of ambition for giving London’s children a healthy start to life?

The ability to obtain healthy affordable food is one of the most crucial ways to ensure that children have a healthy start. For some there is a lack of physical, social and economic access to sufficient, safe and nutritious food that meets dietary needs and food preferences for an active and healthy life. This means that children often have to skip or skimp on meals, often choosing less healthy options because they contain more calories and can result in episodes of hunger, chronic poor nutrition and low educational attainment. Therefore ensuring sufficient or secure access to food should form a part central part of the Mayor’s overall ambition to give London’s children a healthy start to life.

The GLA can measure success by monitoring how well councils are doing to improve food poverty across all of the existing national policies and initiatives that have been put in place to address food poverty. For example, since 2015, Sustain has released a yearly report called Beyond the Food Bank which tracks what London councils are doing to improve household food insecurity. It does so by looking at 10 key areas within the influence and responsibility of local authorities to help those in food poverty. The measures most relevant to children include:

1. Have a comprehensive plan to reduce food poverty
2. Have a designated Healthy Start coordinator and an integrated programme of activities to reach a minimum local uptake for 80%.
4. Protect and harness the value of children’s centres, using them to deliver concrete actions to tackle food poverty.
5. Work with partners to ensure children have access to food 365 days a year, which should include London-wide measurement of school meal uptake (including free school meal uptake), alongside measuring whether schools meet School Food Standards. Also encouragement of all councils to appoint a coordinator for holiday food provision to tackle holiday hunger, and measuring which boroughs provide this.
6. Lead on activities to improve physical access to good food by working with planners, retailers and caterers.

Please see our Beyond the Food Bank reports for more information on what this measurement could look like.
Healthy Places

Is there more that the Mayor should do to make London’s society, environment and economy better for health and reduce health inequalities?

Purchasing and eating behaviour is influenced by the food around us. Large portions of foods high in calories, salt, fat and sugar are cheap and too widely available, leading to Londoners developing unhealthy habits. Studies have also shown that a basket of healthier foods costs more in some of the most deprived areas of our city creating economic unfairness and further exacerbating inequalities.

The Great Weight Debate and GLA YouGov polls show Londoners want the Mayor and partners to act. We believe the following actions should be considered as ways to achieve this:

- Create stronger and coordinated measures to control proximity of unhealthy hot food takeaways close to premises used by young people and work with local businesses to improve their food offer. (Obj 3.2).
- Improve access to affordable healthier food in all neighbourhoods especially schemes that operate in areas of poor health, ensuring access to diverse food retail within walking distance. (Obj 3.2). In addition support social enterprise and SMEs looking to meet these needs that can create a multiplier effect within the local economy.
- We commend the healthy streets approach but would like to see access to nature, based on strong evidence of the importance of access to nature to health, wellbeing and stress levels. This could be edible or pollinator friendly trees, planters or soft landscaping. We would also be interested at how this adapts to the high streets and to shops i.e. can a healthy street exist if there are back to back chicken shops?
- We agree with the importance of green spaces (Obj 3.3) but would like to see that these are quality green spaces that include community food growing and allotments as a key part of our green infrastructure. This should also be integrated into the healthy streets approach (see above).
- In the same way that Fuel Poverty has been addressed we would like to see the Mayor commit to a similar approach to Food Poverty through developing a city wide action plan and enabling all boroughs to follow suit. (Obj 3.4). This would include actions to address poor nutrition and poverty suffered by older people who live in boroughs where pressure on budgets has led to cuts in valuable services such as meals on wheels.
- **Healthy Workplaces**: In support of the ambitions to create healthy workplaces through the London Healthy Workplace Charter, we would like to see recognition of the role of good food in these workplaces that encourage healthier options and remove unhealthier options, focusing on actions such as healthy vending and good food catering policies. See our Good Food at Work publication.
- Ensure that procurement and purchasing across the GLA family support healthy and sustainable food and farming with the introduction of good food at work and other policies.
- Support current and future initiatives such as the Healthier Catering Commitment to help fast food outlets wanting to make their food healthier and the Local Authority Declaration on Sugar Reduction and Healthier Food.
- Use the London plan to help communities that are trying to tackle the above

We would also like to see this strategy reinforce LFL ideas put forward into the Environment strategy including
• Improve access to and protection for community food growing as part of the access to green spaces agenda
• Development of Mayoral lead flagship scheme linking green spaces and health e.g. food growing in every park or dementia garden in every borough, building on work of organisations such as Sydenham Garden.

**How can you help to reduce inequalities in the environmental, social and economic causes of ill health?**

We champion local policies and initiatives and measure these through the annual Good Food for London and Beyond the Foodbank reports that track London Borough progress on key actions to improve health and sustainability through food, and household food insecurity, through mechanisms under local authority control.

Continuing our work on food poverty we would like to work with the GLA to support all boroughs and the major to develop a coherent and comprehensive action plan to address Food Poverty.

We also want to support more local initiatives and social enterprises looking to create healthier places, through provision of good food and would like to work with others to support start up and growth for enterprises in this field, which also create local employment. We have also launched a new jobs website for the sector to help people to access these careers. www.rootstowork.org We are currently seeking funding to support diverse, small food retail.

**What should be our measures of success and level of ambition for creating a healthy environment, society and economy?**

• Improved access to healthy food outlets and quality green spaces; every household should be within 500m of healthy affordable food (the opposite of which is considered to be a food desert).
• Everyone has access to a food growing garden or allotment within their neighbourhood.
• The number of organisations who have created a good food at work policy. This could be further encouraged in all organisations who receive funding from/contracts with the Mayor, GLA and its family.
Healthy Communities

- Is there more that the Mayor should do to help London’s diverse communities become healthy and thriving?

Sustain supports the Mayor’s vision for a city where the places that people live in and the social networks they build do not unfairly reduce life expectancy or quality of life. However we believe that a city where everyone has access to healthy affordable food regardless of where they live plays an important part of increasing life expectancy.

Specific recommendations would include: Ensuring all residents have physical access to good food:
This could be recognized in the objectives listed on page 87; many Londoners struggle to find affordable, healthy food near where they live and as previously mentioned we would like to see measures to protect and encourage provision and diversity of food retail.

Reasonable physical access to healthy food outlets is a distance of 500 metres or less - a walking time of approximately ten minutes for the average person. Where this does not exist we would like to see support for local communities to provide these services, with support from councils and the health services. This could be support for outlets and stalls that provide the low-cost provision of fruit and vegetables and other healthy foods, helping low-income citizens have access to affordable fresh fruits and vegetables within easy walking distance of where they live.

We would like to see recognition of community food initiatives that provide opportunities for people – especially those on lower incomes - to participate in their community, celebrate the capital’s food cultures, access healthy food and support empowerment.

We support the idea of social prescribing to see how community projects can deliver health outcomes and relieve pressure on NHS service, particularly linking with access to nature. Within this it is important that the approach tries to address the issues with lack of funding that is being provided for the voluntary services delivering the activities and the pressure this is creating for some open-door services. We would welcome support for London’s voluntary sector to measure cost savings and identify mainstream funding routes as well as to see how smaller, community-led groups can be part of the social prescribing agenda.

How can you help to support thriving communities?

We also champion local policies and initiatives and measure these through our annual Good Food for London and Beyond the Foodbank reports which track London Borough’s progress on key actions to improve health and sustainability through food, using mechanisms under local authority control.

We also run the Capital Growth network of food growing gardens and support communities to start and grow their food growing initiatives. We would like to ensure that the role they play is recognised, the spaces they operate in are protected and that groups are supported to continue to create a healthy local community that provides free access to quality healthy green space.

What should be our measures of success and level of ambition for creating healthy and thriving communities?

Communities that have access to quality healthy green space, thriving diverse high streets and run a range of initiatives to improve their own health.
Healthy Habits

Is there more that the Mayor should do to help to reduce health inequalities as well as improve overall health in work to support Londoners’ healthy lives and habits?

This chapter represents perhaps the clearest link with food through the references to childhood obesity. And while the drivers of this are covered to some extent within the other chapters, and although we welcome the commitment from the Mayor to introduce a new policy on hot food takeaways within school zones, we feel that this chapter otherwise lacks detail on concrete actions that could be taken.

We welcome the reference to an integrated approach with the London Food Strategy, reinforcing messages about healthy and sustainable food. But we would like to ensure that the Mayor is using this statutory strategy to commit to a number of actions linked to health and obesity. This could highlight concrete measures, including:

Tackle corporate advertising and sponsorship, for example:
- Restrict advertising of sugary drinks and food high in fat, sugar and salt (HFSS) in the TFL network and other GLA spaces, either through nutrient profiling or the introduction of a levy on these adverts, with money raised going to support initiatives that promote alternatives.
- Restrict sponsorship to GLA programmes and projects from sugary drinks companies, manufacturers of foods HFSS and fast food companies.

Improve the food controlled or influenced by the GLA through catering standards, for example:
- Build on the GLA’s commitment to humane and sustainable food catering standards for London’s City Hall, police, fire brigade and transport services by reducing the sugar content (reformulating recipes) and lowering the carbon footprint (offering less, but better meat, and more vegetables) of the food on offer.

Reduce prominence of sugary drinks and promote free drinking water, for example:
- Get water refill stations on tube stations and other major transport hubs.
- Put in place voluntary sugary drinks levy and raise funds for children’s health promotion. For example, the City Hall café has already signed up to the Children’s Health Fund, but other caterers in the GLA family could come on board.

Support businesses and organisations to improve their food offer, for example:
- Use planning policies in the new London Plan to limit the development of new hot food takeaways not just around schools but also in town centers and near other places where young people congregate.

Ensure public events are exemplars of healthy food culture, for example:
- Ensure food and drink provided at public events organised by the GLA meet healthier food guidelines, and avoid HFSS food offers.
- Ensure that the majority of food and drink provided at public events on GLA premises and property meet healthier food guidelines and avoid HFSS.

Raise public awareness and encourage action in other settings, for example:
- Use the Mayor’s influence to encourage organisations, institutions and businesses with a London-wide presence to sign up to nationally-recognised campaigns (listed below) to transform their food environments and use their reach to inspire more Londoners to make healthier choices.
a. We recommend that the Mayor use the Local Government Declaration on Sugar Reduction and Healthier Food framework to make an inventory of all policies and practices under the direct control or influence of the GLA team to address the 6 measures above.

b. While the Local Declaration is about getting the GLA’s “house in order”, public campaigns such as SUGAR SMART are about getting businesses, education settings and communities involved to achieve the biggest impact for London.

c. The Peas Please Veg Cities initiative is another opportunity for London Boroughs to support a cross-sector approach to improving the diets of residents by making it easier to access and consume more vegetables.

What can you do to help all Londoners to develop healthy habits? What is preventing you from doing more and what would help you?

We are running campaigns to support the SUGAR SMART, Local Declaration and Veg Cities initiatives in London. We are already working with three boroughs on SUGAR SMART and 10 on the Local Declaration with many more interested. City-wide leadership and support would be significant in getting more boroughs on board, as well as businesses and organisations with a London-wide presence.

We would like to continue our annual Good Food for London Report to ensure that these issues are being tackled at this level.

What should be our measures of success and level of ambition for helping more Londoners to develop healthy habits?

The initiatives mentioned above provide a fantastic framework for achieving long-term change within the GLA, local authorities and settings beyond the public sector. We recommend that the Mayor uses his influence to increase the uptake of these campaigns to all London Boroughs. We also recommend that the GLA sign up to all three and takes the necessary steps toward the 6 recommended measures to tackle obesity and poor diets.

One way of measuring success would be to use the Government’s Nutrient Profile Model to monitor how much space (and time) Transport for London advertising space is used for adverts that are HFSS (High in fat, salt and sugar) as a first step towards any activity to reduce these adverts.

For water fountains, creating a site, or using an existing one, to monitor the number of new water fountains, whilst also providing a publically accessible map/app of provision will be a good measure of success, but only alongside a high profile scheme to help create new fountains.