



**Children's Food
Campaign**

sustain ^{20 years}
the alliance for better food and farming

Submission to Ofsted Education Inspection Framework 2019

About Us:

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, in our communities and throughout our society that would promote healthy and sustainable food environments. It is a project of the charity Sustain: the alliance for better food and farming. Children's Food Campaign 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: Sustain advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level. Sustain coordinates the Children's Food Campaign, and the Sugar Smart UK campaign. We work with our members and others to promote integrated healthy and sustainable policies and practices for food, farming and fishing.

Background

Children spend an average of 190 days per year at school. After their families and homes, schools are the most important place for children from the age of 3 or 4 until they reach 16 or 18 years of age and become adults..

Child obesity is one of the most pressing health issues affecting children and young people in the UK today. Around 1 in 4 children are overweight or obese by the time they enter primary school, and by the time they leave Year 6, the number has risen to 1 in 3. Children who are overweight or obese, or suffer from healthy weight issues, are more likely also to be affected by associated mental health, bullying and stigma that may affect their learning.

The Government has set out an ambitious target to halve levels of childhood obesity by 2030. There are multiple factors affecting children's healthy weight and food preferences, and the Children's Food Campaign has supported action across a range of policy themes, from improving food and nutrition education, cookery skills, reduction of sugar, fat and salt through reformulation, fiscal measures to disincentivise the manufacture, promotion and purchase of unhealthy food, and a reduction in exposure by children to advertising and marketing of foods high in fat, salt and sugar, including calling for child-friendly TV, film or brand-owned characters to be used only to promote healthier foods. In relation to the role of schools, the Government Childhood Obesity Plan for Action Chapter Two has promised a robust update to School Food Standards, and the introduction of a Healthy Schools Ratings Scheme, both of which require monitoring and reporting so that progress can be tracked.

The role of schools in supporting a healthy food environment for children

We welcome this opportunity to contribute to OFSTED's revised Inspection Framework, as although schools are clearly not the only influence in children's lives, they are a very important one. We strongly believe that schools do have a powerful role to play – through the application of mandatory strong School Food Standards in line with Eatwell guidelines

and SACN guidance for all school food, healthy eating and nutrition education (including food growing and learning about provenance), the development of cookery skills, the encouragement of physical exercise, adequate provision of free drinking water, and the removal of commercial sponsorship and unhealthy food advertising in and around the school zone. As the inspection regime responsible for reporting on school performance and delivery, OFSTED therefore clearly can play a strong role in providing transparency to parents and the public, highlighting good practice where it exists, and ensuring the accountability of school leaders, governors and education authorities for delivery of mandatory requirements.

We recognise that the new Inspection Framework lays a strong emphasis on schools' core role of education and learning, and delivery of the curriculum. In relation to food and healthy eating, Ofsted's own July 2018 report *Obesity, Healthy Eating and Physical Activity in Primary Schools*¹ recommends that schools should be focussing on where they might have most impact in supporting a healthier food environment for pupils including:

- planning a challenging and well-sequenced curriculum, including learning about the body in PE and science about healthy eating and cooking
- providing ample opportunity for children to take physical exercise during the school day – with lots of opportunities to 'get out of breath'
- teaching particular skills like how to cook or how to dance
- updating parents on their children's physical development such as agility, balance and coordination

Schools also have to ensure that there is a supportive environment in which children can focus and learn effectively. There is clear evidence that a healthy diet and nutritious meals are important to children's educational attainment. For example, one University of Essex study in 2009² indicated that provision healthy school meals can improve educational outcomes, in particular in English and Science, and also were associated with reduced absenteeism due to sickness. A study for the Children's Food Trust has shown that children in primary schools are three times more likely to concentrate in the classroom following improvements to the food and dining room provision³. More recent research into breakfast club provision also shows that providing primary school children with a free and nutritious meal before the start of the school day can boost reading, writing and maths results by the equivalent of two months' progress over the course of a year⁴.

Ofsted's report also notes that "Parents want more time in schools for PE and cookery, more clubs and physical activity and more teaching about unhealthy food and the effect that it has on health. These are all sensible things to ask schools to do that are about the basics of good education for health" (p.6). Cookery and Nutrition Education is a mandatory part of the curriculum for Key Stages 1, 2 and 3, yet it appears that nutrition education is only being delivered in 1 in 4 schools (26%), according to the report despite 90% of schools having a functioning full kitchen facility. Over half of parents surveyed by Ofsted said that what their children learnt in school led them to make healthier eating and drinking choices outside of school (p.5). Therefore schools can catalyse and reinforce healthier eating attitudes and behaviours.

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/726114/Obesity_healthy_eating_and_physical_activity_in_primary_schools_170718.pdf

² https://www.iser.essex.ac.uk/files/iser_working_papers/2009-01.pdf

³ <https://www.ncbi.nlm.nih.gov/pubmed/20808337>

⁴ <https://educationendowmentfoundation.org.uk/projects-and-evaluation/projects/magic-breakfast>

Our proposals for the Ofsted Framework 2019

The Children's Food Campaign is disappointed to note that the revised Ofsted Framework now omits important specific references to the importance of healthy eating and nutrition education as part of both the delivery of curriculum and the delivery of a supportive, nurturing environment in which children have the best opportunity to learn. We believe that Ofsted inspections should include how schools support children to understand food and how to stay healthy. Schools have an opportunity to reinforce healthy eating habits and teach children about nutrition and cooking in ways that are important for their overall physical and holistic development.

Therefore we make the following recommendations to ensure the Ofsted inspection framework delivers on its stated ambition to monitor the effectiveness with which schools can do what they do best in delivering their contribution to the overall programme to address levels of childhood obesity.

Proposal 1 - To what extent do you agree or disagree with the proposal to introduce a 'quality of education' judgement?

We strongly agree with taking a 'holistic approach to the quality of education'. We believe that a holistic approach involves schools practising what they preach: not just educating children about healthy diets and nutrition, but providing healthy nutritious meals in line with best practice in meeting or exceeding School Food Standards, and playing their part to provide a healthy food environment to stimulate learning. However, references to healthy eating and nutrition education are currently not referenced anywhere in the framework, and we would like to suggest they are integrated into relevant sections.

Inspection Framework Pages 10/11: 25. Implementation. We recommend a reference to health included alongside 'cumulatively sufficient knowledge and skills for future learning and employment'.

Inspection Framework Pages 12/13: 28. Leadership and management We recommend a reference to upholding School Food Standards and mandatory curriculum requirements included in the role of governance members to fulfil statutory duties. So, for example "Inspectors will make a judgement on the effectiveness of leadership and management by evaluating the extent to which: ...those with responsibility for governance ensure that the provider fulfils its statutory duties under the Equality Act 2010, and other duties, for example in relation to the 'Prevent' strategy, Safeguarding..." insert the following "upholding mandatory School Food Standards, and curriculum requirements eg. on nutrition education."

We would also like to see a reference inserted into this section on how inspectors will include into the judgement of effective leadership, how the school leadership is enabling "an environment in which pupil health and wellbeing is consistently and actively promoted through the policies and actions of the whole school community."

Proposal 2 - To what extent do you agree or disagree with the proposed separation of inspection judgements about learners' personal development and learners' behaviour and attitudes?

We strongly agree that it makes sense to distinguish between personal development, and behaviour and attitudes in coming to inspection judgements. We believe that personal development includes learners' sense of physical and mental wellbeing, and how to keep themselves healthy. We therefore would like to see this clearly reflected in the relevant paragraph of the inspection framework and supporting guidance, as it is currently omitted.

Inspection Framework Page 12: 27. Personal development - We would like to see a reference to healthy eating and nutrition inserted into the following paragraph: “Inspectors will make a judgement on the personal development of learners by evaluating the extent to which: ... the curriculum and the provider’s wider work support learners to develop their character – including their resilience, confidence and independence – and help them know how to keep physically and mentally healthy,” ... to add the following “including through regular exercise and healthy eating habits.”

Proposal 3 – No Comment

Proposal 4 – To what extent do you agree or disagree with the proposed focus of section 8 inspections of good schools and non-exempt outstanding schools and the proposal to increase the length of inspections from the current one day to two days?

We strongly agree with the proposal to increase the length of inspections from one to two days, as this will then facilitate approaches in order to deliver against a more holistic approach to quality education. 97% of parents, teachers and governors in a School Food Matters’ survey supported by the Children’s Food Campaign said they would like to see the introduction of a Healthy Schools Ratings Scheme⁵, and 85% thought it should be mandatory – this requires that there is reporting on how well schools perform in relation to this. Extending the inspections from one to two days would provide more opportunities for such assessment – including curriculum delivery, existence and implementation of policies on School Food Standards, and relevant interviews.

We recommend therefore that it is clear that inspectors’ considerations beyond academic curriculum delivery also include schools’ commitment to supporting a healthy lifestyle. This could be achieved for example through the text changes to the inspection handbook as below.

Draft Inspection Handbook for Maintained Schools and Academies, Section 91, Talking to and observing pupils outside lessons (p27) - We welcome the reference to observing and talking to pupils in the context of the dining hall, at break times and lunchtimes, and recommend that the wording on p27 is amended to reinstate a specific requirement to “ask school leaders how the school is working to ensure healthy lifestyles for pupils.”

Draft Inspection Handbook for Maintained Schools and Academies, Section 279, Pupils’ Wider Development (p86) - To this sentence “Inspectors will consider the extent to which the curriculum extends beyond the academic, vocational or technical and whether the school goes the extra mile to give pupils a rich set of experiences” ... add the following text: “and promote a healthy lifestyle and environment for learners.”

Proposals 5-6 : No Comment

Additional comments in relation to the detail set out in the draft school inspection handbook.

Section 159: Quality of Education (p41) - Cooking and Nutrition are mandatory Curriculum subjects for Key Stages 1, 2 and 3. In line with Ofsted’s stated focus to “learn about healthy eating and cooking” as part of a balanced and well-sequenced curriculum, and the role that this can play in building children’s knowledge about how to keep themselves healthy, we expect inspectors to look at whether this is being delivered or not.

⁵https://www.schoolfoodmatters.org/sites/default/files/FINAL%20HSRS%20Report%20March%202019_0.pdf#overlay-context=healthy-schools-rating-scheme

We recommend that the wording on page 41 is therefore extended to include a specific reference to cookery skills and nutrition education alongside other national curriculum subjects already mentioned (religious education, age appropriate sex education).

Section 202 Personal Development (p57) - There are many contributors to children's overall health and wellbeing, and sports/physical activity is rightly recognised in this section. However overweight and obesity can trigger effects on mechanical, medical and mental health functions, from ability to move, risk of developing diet-related diseases and stigma or confidence issues.

Whilst we agree that sport/physical activity is key to children's health and wellbeing, in relation to addressing issues of overweight and obesity, it is important to stress the importance of calorie consumption in ongoing management of a healthy weight. As Guy's and St Thomas' 2018 report on the obesogenic environment for children and young people rightly indicates, you cannot exercise away a bad diet⁶. School food, healthy eating and nutrition education, healthy cookery skills and food growing should be given equal weighting as physical education in relation to a healthy lifestyle. We therefore recommend the addition of language to reflect this on p57 of the inspection handbook as follows:

“developing pupils' understanding of how to keep physically healthy and maintain an active lifestyle [INSERT] and a healthy diet, including giving ample opportunities for pupils to be active during the school day and through extra-curricular activities, [INSERT]and to learn about nutrition and how to cook.”

Section 224 Governance (p64) - In line with our recommendation in the main Inspection Framework we believe that it is those with governance/oversight who are responsible for meeting statutory duties. We would like to see a specific reference to compliance with School Food Standards inserted into this section alongside the other statutory duties to meet Equality Act, safeguarding duties etc.

Although inspectors are not expected to construct or review a list of duties, we would expect the guidance to reference compliance with the School Food Standards, and recommend this is inserted on p.64 of the inspection handbook.

Proposals 7-11: No Comment

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⁶ https://www.gsttcharity.org.uk/sites/default/files/Bite_Size_Report.pdf