

SAVE OUR SCHOOL FOOD STANDARDS!

School Food Standards: A submission to the School Food Plan

Don't throw the baby out with the bath water!

November 2012

Joint submission by the Save Our School Food Standards campaign partners:



Supported by:



- tfX: the campaign against trans fats in food
- Children and Young People Nutrition Network



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Introduction

The Save Our School Food Standards campaign was launched in February 2012. It calls for academies and free schools to be required to comply with the same mandatory standards for school food currently safeguarding the quality of food available in maintained schools. The campaign represents a coalition of support for the standards led by the Jamie Oliver Foundation, LACA, the Children's Food Campaign, Food for Life Partnership, and School Food Matters.

The campaign is supported within parliament by Early Day Motion 54, which was tabled by Zac Goldsmith MP. At the time of writing the Early Day Motion has cross party support from 112 members of parliament. Our online call to action has mobilised 912 supporters who have emailed a total of 414 individual MPs.

Collectively this group represents 86 years of frontline experience in school food and children's health issues. We understand the complexity of 'getting it right' and that standards are just one piece of the school food puzzle but we believe that mandatory minimum standards represent the foundations of any school food provision.

As a minimum, mandatory standards protect children from unhealthy food that will have an adverse effect on their ability to learn. At best, standards provide the catalyst for schools to be ambitious and embed excellence in school food and food education.

We think we can help the School Food Plan team understand better the importance of standards. We know that the team is getting to grips with the school food puzzle and has "*visited 'regulated' schools where the kids fill their plates solely with Yorkshire puddings or roast potatoes.*"¹ However, this example does not demonstrate a problem with regulation rather a problem with training or supervision or a lack of food education: other pieces of the school food puzzle. So that's why we've called this submission 'Don't throw the baby out with the bath water'.

Why Regulation?

Together we have identified six key areas to frame our call for mandatory standards across all schools:

- **Protecting our investment in children's health and wellbeing**
- **Acknowledging the evidence; standards are working**
- **The economic landscape; why schools need help now more than ever**
- **What is healthy food? Standards offer a definition**
- **A future without standards; déjà vu?**
- **A future with standards; holding our nerve and continuing the journey**

¹ On the subject of regulation: The School Food Plan website 2012
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Protecting our investment in children's health and wellbeing

To date, an estimated £680 million has been invested in school food². We believe the Government should be committed to protecting this investment of taxpayers money and recognise that any programme of change takes up to ten years to embed³.

Standards were introduced as a weapon against the "Obesity Timebomb", a term coined by Sir John Krebs, Chair of the Food Standards Agency in 2003. Investment in school meals and mandatory standards was considered money well spent in the light of the burden of obesity on scarce NHS resources. Currently, around 5–6% of its total budget is spent on the disease consequences of overweight and obesity.

Earlier modelling has shown that the costs to the NHS of the consequences of excess weight were £4.2bn in 2007, with the prospect of rising up to £6.4bn in 2015 and up to £9.7bn in 2050. A more recent analysis of the economic burden of a range of risk factors for chronic disease, estimated that overweight and obesity now cost the NHS £5.1bn per year.

Taken together, it has been estimated that the costs of overweight and obesity to society and the economy were almost £16bn in 2007 (over 1% of GDP), with the prospect of rising to just under £50bn in 2050 if increases in obesity rates continue unchecked⁴. In the light of these figures, the money spent on implementing the school food standards looks like small change.

Looking at the investment in the School Food Trust's work alone, recent analysis has found that this equates to a cost of just £141 for each pupil starting to take a school lunch between 2007 and 2011⁵. As the report notes: *"While the long-term impact of taking a school lunch is not fully known, from a public health perspective, £141 represents a small cost in relation to a change in eating habits in keeping with Government guidelines and with the potential to affect lifetime eating habits (and concomitant improvements in health) that may accrue from an introduction to healthier eating in school."*

Reinstating mandatory standards across all schools would be a cost neutral move; the investment has already been made, the industry has responded, the systems are in place. Schools and parents recognise the standards and understand the need to comply.

Acknowledging the evidence; standards are working

Over the past 7 years, the Children's Food Trust has been tracking the impact of national school food standards on school menus, children's consumption in school and their ability to perform in class. We know that a school meal that complies with the standards is healthier and more varied than the vast majority of packed lunches⁶. Research also shows the correlation between a healthier menu and an increase in school children's concentration⁷ and attainment⁸.

On the international stage, the United Kingdom is seen to lead the way. Research by the Children's Food Trust shows that England has the most comprehensive school food standards when compared with leading countries in Europe, as well as the US, Canada and Australia⁹.

²£529m investment through the School Lunch Grant and the programme of work to support schools, workforce training and to inform parents by the School Food Trust to March 2013, plus £150m of Targeted Capital Funding (TCF) to fund the installation of kitchens in schools (subject to 50% matched funding from local authorities). See School Food Cost Benefits: England; Michael Nelson 2012 http://journals.cambridge.org/repo_A86yIZ4s Targeted Capital Funding: Surrey County Council 2010 <http://tinyurl.com/c8nr6q7>

³"Until changes sink down deeply into the culture, which can take three to ten years, new approaches are fragile and subject to regression"

John P Kotter, Professor of Leadership at the Harvard Business School (USA) "Leading Change"; Harvard Business School Press 1996

⁴DH, Healthy Lives, Healthy People 2011 p 16-17, <http://tinyurl.com/bsf7ok4or> Foresight report 2007 <http://tinyurl.com/bgoifp2>

⁵School Food Cost Benefits: England; Michael Nelson 2012 http://journals.cambridge.org/repo_A86yIZ4s

⁶Primary School Meals Survey 2009 <http://tinyurl.com/cp29wr2> Primary School Lunch v Packed Lunch 2009 <http://tinyurl.com/c5vec4v> Secondary School Provision and Consumption <http://tinyurl.com/d7ktszq> Secondary School Lunch v Packed Lunch 2011 <http://tinyurl.com/d9fu58t>

⁷School Lunch & Learning Behaviour: Primary <http://tinyurl.com/clm4xf3> Secondary <http://tinyurl.com/cslth2x>

⁸Implementing the Free School Meals Pilot; National Centre for Social Research 2012 <http://tinyurl.com/d5m4zkr>

⁹School Meal Provision in England and other Western countries: A review <http://tinyurl.com/d7lgysn>

In recent years we have seen how the world looks to the UK for good practice. Representatives of the US Government have hosted UK school food professionals and a US delegation has visited the UK and we have shared examples of policy and programme implementation. In 2012, the School Food Trust hosted an International Workshop where delegates from more than 15 countries presented findings on the links between evidence and school food policy around the world.

The economic landscape; why schools need help now more than ever

Now more than ever, schools need the framework that standards offer to guide them through the complexities of a successful meal service. Schools are already being forced to do more with reduced budgets and the help and guidance they received from their local authorities (LA) is fast disappearing as LAs devolve responsibility for school meals back to schools in an attempt to cut Council spending.

We are already seeing the impact of the withdrawal of LA support. When Swindon Borough Council abandoned its central meals service in 2005, giving all responsibility to schools and removing any support for the school meals service, more than half of school kitchens closed. In 2009 a Project Officer was employed when the Council won some Government Capital Funding for kitchen and dining improvements but was subsequently made redundant leaving no-one with any brief for school meals in the authority.

Wiltshire County Council has adopted the same approach with over 300 schools having to make their own contracting arrangements without any technical or professional help from the Council. Some schools have clustered together to tender their service but many have not renewed contracts and have abandoned their school meals altogether. Other examples can be found in Croydon¹⁰ and Devon¹¹.

Furthermore, in schools without a hot meal service, children on free school meals are supplied with a packed lunch and have lost the anonymity that the hot meal service provided so we find that the decision to cancel the meal service is inadvertently stigmatising children from the poorest families.

National support has also disappeared. In recent years we have seen the demise of the National Healthy Schools Programme in England and the Childhood Obesity National Support Team, two programmes that looked carefully at food in schools. Added to this, the new Ofsted framework no longer looks at pupil health and wellbeing. Previously, nine health areas had been monitored as part of the inspections process although none specifically took account of food or nutrition standards.

Without health ambassadors and professionalism within local authorities to champion good school food or national programmes to encourage healthy eating, what support do headteachers have left? The School Food Trust is an invaluable resource but the necessary 'hand-holding' is hard to find. The school food standards provide an essential starting point for schools and a safety net to ensure that they deliver a healthy, nutritious meal.

What is healthy food? Standards offer a definition

The national school food standards provide a definition of healthy food. Repeatedly in Parliament, questions relating to school food are answered by reference to the standards. Since the general election in 2010 there have been 43 Parliamentary Questions in the House of Commons, 10 in the House of Lords and a Westminster Hall debate on School Food all using the standards as the definition of healthy food. However, the Government has failed to clarify its definition of healthy food for non-maintained schools.

¹⁰ Croydon Today August 2010 <http://www.thisiscroydontoday.co.uk/Undefined-Headline/story-11367812-detail/story.html>

¹¹ This is Devon May 2012 <http://www.thisisdevon.co.uk/hot-meals-13-Devon-schools/story-16096824-detail/story.html>

Academy head teachers who want to reassure parents that they are providing healthy food to pupils need a mechanism by which they can measure and demonstrate their commitment; analysing their menus in the same way as maintained schools will provide this. A compliant menu provides headteachers with evidence-based information to give to parents on their child's provision whilst at school.

Early in November this year, LACA published the result of its annual survey¹². LACA's questionnaire was posted on the ParentPay website and over 12,000 parents responded. When asked whether 'schools should have to abide by a set of nutritional standards', 92.3% of respondents said yes. Likewise, the Jamie Oliver Foundation asked the question "Do you want to see the standards for school food in ALL schools including new academies?" So far the online poll has attracted 2,135 replies and 94% have said yes.

Parents need the definition of healthy food that the standards offer. Over the past seven years the school food industry, along with the School Food Trust, has put a huge effort into informing parents that the standards are required, but they will have no data or benchmark if they are removed or inconsistently applied. Parents are likely to be confused by varying and voluntary approaches to the quality of school food. They will not know if their schools are required to comply with or are exempt from the standards, or what the Government's expectation is for the service. It is unrealistic to expect parents to challenge a school over its food provision unless we have some sort of regulation in place.

A future without standards; déjà vu?

Before going any further, it's worth pausing for a quick history lesson on school food and standards. This edited excerpt is from the 2005 report by the School Meals Review Panel, *Turning the Tables*¹³

Nutritional standards for school meals were first set in 1941, specifying levels of protein, fat and calories. The Education Act (1944) made it a duty of all local education authorities (LEAs) to provide school meals, and from 1947, the full cost of school meals was met by the Government.

The Education Act (1980) removed the requirement on LEAs to sell meals at a fixed price and abolished nutritional standards for school meals. The Act aimed to cut public expenditure on school meals, leading to the introduction of convenience foods and the dismantling of some LEA catering services.

The Local Government Act (1988) introduced Compulsory Competitive Tendering, obliging all LEAs to put school meals services out to tender on a 'lowest bid wins' basis. This created a move from public to private sector provision in which quality of food was placed second after cost. In 1998 'Fair Funding' provisions led to the delegation of funding for school meals to all secondary schools and 'Best Value' public service procurement meant that decisions about school meal provision were increasingly financially driven.

As concerns about the nature of school meal provision grew, minimum nutritional standards for school lunches were reintroduced in England in April 2001. The Caroline Walker Trust's scientifically based nutritional guidelines for school meals were not introduced as a statutory requirement but have since been accepted as an aspirational 'gold' standard.

The combination of these policies resulted in severe financial pressures and the fragmentation of school catering. In 2005, 13% of schools had no kitchen facilities and children entitled to free meals in these schools are only provided with sandwiches. Together with a lack of strict standards, these factors have resulted in the type of school meal often seen today.

Does any of this sound familiar?

¹² The LACA/ParentPay Market Research Report on School Meals and Daily Life Issues 2012 <http://tinyurl.com/cugljvc>

¹³ *Turning the Tables: School Meals Review Panel (2005)* <http://dera.ioe.ac.uk/5584/3/SMRP%20Report%20FINAL.pdf>
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School food standards allow caterers to keep costs down during a time of increased pressure on local authority finances. Further fragmentation of the service risks increased costs. Each school which chooses to remove itself from an established local authority contract and generate additional income through school food standard non-compliant offers, reduces the value of the remaining contract and pushes up costs through reduced economies of scale. In addition, tendering costs to both schools and the bidders will increase if multiple single site contracts are let rather than central one. The industry has already acknowledged this as a problem.

Mandatory food and nutritional standards have given contract caterers a 'level playing field' in which bidding on the same minimum specification affords the opportunity to be competitive by adding value. We see caterers aiming high and celebrating their efforts to exceed the standards in their marketing:

"We recognise that as custodians of our Fresh Food Policy we need to ensure our menu offer is fresh and encourages healthy, balanced eating. We verify our menus to ensure they not only match but exceed the latest Government guidelines."¹⁴

Here's how another caterer markets to Independent schools:

"Furthermore, the increased focus on health and nutrition in maintained schools - including the introduction of nutrient-based standards, with which Harrison's maintained school menus are compliant - means that independent schools will be expected to deliver an ever-higher standard of nutritionally-rich catering for demanding students and parents."¹⁵

Without standards we fear we will see a 'race to the bottom' as seen in 1988 with Compulsory Competitive Tendering. This is now also being seen in the US, where the specification of food standards **only** has resulted in manufacturers finding ways in which to make poor quality foods 'compliant' rather than providing the new innovation we have enjoyed under the nutritional standards. A prime example seen by LACA at the recent trade show in Denver is the 'Breakfast on a Stick'; a maple sausage wrapped in a blueberry pancake and deep-fried. As the pancake is 51% wholegrain it is deemed compliant and can be served to pupils despite the poor quality protein and the fact that it is deep-fried and full of fat and sugar!

In the UK this race to the bottom has already begun with many caterers, both local authority and contract caterers, being asked for food that does not comply with the standards. Non-compliant menu items tend to include high profit yielding options such as cakes, pastries, bagged savoury snacks, confectionery and non-compliant drinks.

The School Food Plan's Terms of Reference state that *"there is no evidence that food in academies has deteriorated"* yet this is not what we're seeing on the ground. A school in North Somerset terminated its participation in a central contract when it became an Academy. Within 11 weeks of the change in status, the food offer and approach had fundamentally changed. The school moved from a service with an emphasis on 'meal deals' and hot food provision to a 'grab and go' culture. The full menu ceased to conform to food or nutritional standards and the school policy was changed to allow pupils to go through with a plate of chips and a piece of cake on a tray, a total reverse in ethos.

Thankfully there are still those who see that the way to reduce costs is not by reducing standards: *"The key to a low cost in providing a school meals service is not to reduce the food cost but to increase sales and this spreads staff and other overheads further."* Ian Crook, Business Manager, Bath and North East Somerset Council.

¹⁴ CaterLink Ltd <http://www.caterlinkltd.co.uk/good-healthy-food/nutritionist-says/>

¹⁵ Harrison Catering in Independent Schools <http://www.harrisoncatering.co.uk/independent-schools-clients.html>

Like the School Food Plan team, we have enjoyed watching some Academies choose to meet and exceed the school food standards through, for example, the Food for Life Partnership programme or the Food for Life Catering Mark, but can children's health be left to chance? We are at risk of seeing a fragmented catering service; diminishing pockets of excellence within a cash-strapped service without the safety net that standards provide. There is a better way ...

A future with standards; holding our nerve and continuing the journey

This submission would not be complete without a description of the future we believe our children deserve.

- With standards we ensure that all children are protected from food that has an adverse effect on their ability to learn;
- With standards for all, every child will enjoy the health benefits that standards bring, rather than just the lucky minority of children whose schools prioritise food and nutrition.
- With standards we have a catalyst for excellence. The Food for Life Partnership (FFLP), a programme proven to transform school food culture, believes the standards are fundamental in providing a nutritional baseline for school food. As such, they are built into the foundations of their award criteria, which must be met by **all** FFLP awarded schools, whether they are maintained, academy, independent or free schools.
- With standards, by 2017, we will have ten years of robust data showing the continued improvement in health outcomes for school children. By 2019 we will have a cohort of young people who will all have received school food meeting the national standards. Early indications from primary schools suggest that in those where take up of school meals has increased, there is more likely to be a decrease than an increase in the number of Year 6 pupils who are overweight or obese¹⁶.
- With standards we will be able to proudly say that in England our legislation puts children first and is resilient to political sway.

Our Recommendations

The School Food Review has been tasked with addressing two key questions: *what more needs to be done to make tasty, nutritious food available to all school children and how do we excite children about the food so that they want to eat it?* This submission addresses the first of these. We maintain that standards provide the necessary benchmark for 'nutritious food'. We are presenting three recommendations to the School Food Plan in order of priority.

Our first recommendation is a simple cost neutral policy which would demonstrate that the Government supports and values the work of '*the large array of people*' it references in the Department for Education media release on the School Food Review¹⁷, and prioritises the health and well-being of **all** children and not just those in maintained schools:

1. The Department for Education brings forward regulations to amend the Education (Nutritional Standards and Requirements for School Food) (England) Regulations 2007 to require **all** schools to adhere to the standards for school food.

The second and third recommendations look further at the Review's desire to "**ensure** that our children are eating well in schools"

2. The Department for Education introduces robust monitoring of school food standards¹⁸;
3. The Department for Education reintroduces the criteria measuring 'the extent to which pupils adopt healthy lifestyles' which was lost in the revised Ofsted Inspection Framework¹⁹

¹⁶School Lunch Take up and Obesity: School Food Trust <http://tinyurl.com/cwk23x8>

¹⁷Department for Education Press Notice: Improving School Food July 2012 <http://tinyurl.com/c5r37xn>

¹⁸For the past six years, Education Scotland has employed four full time Health and Nutrition inspectors who measure a raft of criteria: the dining room experience, the anonymity issues of FSM children, compliance, access to drinking water, and free bread, arrangements for religious observance, presentation quality, portion size, customer selection, plate waste, promotions and menu compliance. They also inspect on how food and health are integrated into the curriculum and all members of the school community are interviewed, from pupils to head teachers.

¹⁹Ofsted; The framework for school inspections from September 2012 <http://tinyurl.com/7i2qx9j>

Next Steps

To ensure that the School Food Plan team has everything it needs to make sound recommendations on standards, we propose that you meet with us by the end of November. This will allow you to guide a well-informed discussion on standards when the Expert Panel meets on 7 December.

Furthermore we're keen to demonstrate to you the level of support for school food standards, so will be launching an online action; an evidence-gathering tool enabling students, parents, teachers, caterers and health professionals to email you directly on the issue of standards. We think you will find this useful.

Thank you.

Save our School Food Standards

www.sosfood.org.uk

Children's Food Campaign, Food for Life Partnership, Jamie Oliver Foundation, LACA and School Food Matters

Supported by:

- Academy of Culinary Arts
- Academy of Royal Medical Colleges
- Association of Teachers and Lecturers
- British Association for the Study of Community Dentistry
- British Dental Foundation
- British Heart Foundation
- Children and Young People Nutrition Network
- Community Practitioners' and Health Visitors' Association
- Consensus Action on Salt and Health
- Diabetes UK
- Faculty of Public Health
- Farms for City Children
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- Food Matters
- Garden Organic
- GMB
- HACSG
- Heart of Mersey
- Health Education Trust
- HUSH - The UK E.coli Support Group
- Mend
- Merton Parents for Better Food in School
- NASUWT
- National Federation of Women's Institutes
- National Heart Forum
- National Obesity Forum
- National Union of Teachers
- Royal College of Paediatrics and Child Health
- Royal College of Obstetricians and Gynaecologists
- Royal College of Psychiatrists
- Royal Society for Public Health
- tFX: the campaign against trans fats in food
- The Children's Society
- Trading Standards Institute
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