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**Health, Social Services  
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HEALTH

**Sláinte, Seirbhíse Sóisialta  
agus Sábháilteacht Phoiblí**

HEALTH

**Roimhe, Beocheantar Heilín  
an Foch Síneir**

## **DRAFT FOOD IN SCHOOLS POLICY**

### **CONSULTATION RESPONSE QUESTIONNAIRE**

**DEADLINE: 11 December 2009**

**September 2009**

## INTRODUCTION

The Department of Education (DE) and the Department of Health, Social Services and Public Safety (DHSSPS) have drawn up a Food in Schools policy document that brings together all the range of strategies and plans that are being put in place to deliver improved nutrition for our school children.

We would like to seek your views on this proposed policy.

## ABOUT YOU

We would be grateful if you could provide the following information:

**Name:** Dr Joanna Wydenbach

**Organisation Represented:** Healthy Food for All  
(if applicable)

**Address:** Clonliffe College, Dublin 3, Ireland

**Town/City:** Dublin

**Postcode:** Dublin 3

**Signature:** Joanna S. Wydenbach

**Date:** 10 December 2009

Please select one category from those below that best describes you:

- |                             |                          |                              |                          |
|-----------------------------|--------------------------|------------------------------|--------------------------|
| Parent                      | <input type="checkbox"/> | Principal                    | <input type="checkbox"/> |
| Teacher                     | <input type="checkbox"/> | Member of Board of Governors | <input type="checkbox"/> |
| School Caterer              | <input type="checkbox"/> | Pupil                        | <input type="checkbox"/> |
| Education and Library Board | <input type="checkbox"/> | Union Representative         | <input type="checkbox"/> |
| Food Manufacturer           | <input type="checkbox"/> | Food Supplier                | <input type="checkbox"/> |
| Dietitian/Nutritionist      | <input type="checkbox"/> | Other Health Professional    | <input type="checkbox"/> |

Other (please specify) NGO

If you are a Principal, Teacher, member of a school Board of Governors, parent or pupil please select the category of school or schools below with which you are associated. Mark all the boxes that apply:

- |         |                          |              |                          |
|---------|--------------------------|--------------|--------------------------|
| Nursery | <input type="checkbox"/> | Primary      | <input type="checkbox"/> |
| Special | <input type="checkbox"/> | Post-Primary | <input type="checkbox"/> |

## SECTION 1 – AIMS AND OBJECTIVES

The draft Food in Schools policy sets out the overall aims and objectives of Executive policy in relation to food in schools and describes the range of strategies and plans that are being put in place to deliver improved nutrition for our school children. (Paragraphs 1-3)

1. Do you agree that it is necessary to have a Food in Schools policy in order to deliver improved nutrition for our school children?

Yes  No

### Any other comments:

Healthy Food for All (HFfA) welcomes this policy as it is essential that Northern Ireland has a Food in Schools policy to support the Nutritional standards for school lunches and the work of the Public Health Agency in schools, including *school food: an essential guide*. While HFfA recognises that this policy represents a good foundation for future action, this policy must be fully implemented on the ground and food provision outside school hours must be looked at further.

The principal aim of the Food in Schools policy is to ensure that food in schools is representative of the balance of good health; makes a significant contribution to childhood nutrition and that schools contribute to the development of the knowledge and skills necessary to be able to make healthy food choices. It also aims to ensure that early years settings provide adequate opportunities for good nutrition and embed good habits in terms of healthy eating. (Paragraphs 4-8)

2. Do you agree with the aims and objectives of the proposed policy?

Yes  No

### Any other comments:

- HFfA recommend that the policy needs to strengthen and prioritise its anti-poverty focus.
- Though the policy will have a role in meeting the Public Service Agreement target, to “halt the rise in obesity” by 2011, the policy needs to be clearer from the outset how this will be monitored.

## SECTION 2 – TAKING A WHOLE-SCHOOL APPROACH

The policy proposes a whole-school approach to food and nutrition. This includes food available in tuck shops, vending machines and other sources of food in schools. This is required if we are to effectively address the range of issues impacting on childhood nutrition and the food choices that children make in school. (Paragraphs 9-11)

3. Do you agree with this approach?

Yes  No

### Any other comments:

- HFfA recommend that the whole school approach should also be directed at staff, as well as children in schools, and should be adopted in Education and Library Boards/Education Centres, parent organisations, and community and voluntary organisations (this includes activities held after school with children).
- HFfA recommend that the policy supports the involvement of parents in school food policies by creating links between school food consumption and home food consumption, including parents taking a role in the delivery.
- HFfA recommend that the policy should also support a wider community approach towards children and food, in terms of acknowledging the role of dietitians and people in the community.

The policy indicates that issues such as the food that children bring to school (eg packed lunches), the length of school lunchtimes and the rules on children leaving the school premises at break and lunchtimes are matters for schools to decide on at local level in conjunction with parents, supported as necessary by Education and Health partners. (Paragraph 10)

4. Do you agree that this is the correct approach?

Yes  No

### Any other comments:

- HFfA recommend that voluntary guidelines should, as a minimum, be made available to parents.
- HFfA recommend that the policy should provide voluntary guidelines to all schools on food to be eaten on the school premises and food being brought into schools.
- HFfA recommend that the following should be part of the policy, not left to the school's responsibility:
  - The length of school lunchtime should be standardised across all schools taking into account a reasonable amount of time needed to eat lunch and take exercise.

## School Meals and Food Other Than School Lunches

DE has drawn up nutritional standards for school lunches and other food in schools.  
(Paragraphs 12-30)

5. Do you agree that it is important for these standards to be applied on a consistent basis throughout all aspects of the school including healthy break programmes, breakfast clubs etc?

Yes  No

### Any other comments:

- HFfA recommend that the 2005 figures for minimum expenditure on the food content of meals be revised, in light of changes in food prices and the introduction of the new nutritional standards.
- HFfA recommend that it be compulsory for schools to provide water.
- HFfA recommend that money for breakfast clubs is increased and ring-fenced by the Government.

## Nutrition in Early Years

DE, in conjunction with DHSSPS, is drawing up recommended standards for childcare.  
(Paragraphs 31-33)

6. Do you agree that these standards should include guidance in relation to the provision of food?

Yes  No

### Any other comments:

- HFfA recommend that there needs to be acknowledgement that the nutritional needs of children under 5 years are more complex and this needs to be addressed in the policy document.

## Promotion and Advertising of Food to Children and Young People

The policy encourages schools to look carefully at how the promotion of less healthy food options for children should be restricted eg through removing branding on vending machines, consideration of sponsorship of events etc. (Paragraph 34)

7. Do you agree with this approach?

Yes  No

### Any other comments:

- HFfA recommend that consideration needs to be taken of the fact that if less healthy food branding did not fund football shirts etc. who would fund such events and activities? Also, consideration needs to be given to whether promotion and advertising should be restricted more formally.

## Developing Knowledge and Skills

The policy highlights the connections which schools should develop between food policies and the revised curriculum. It also recommends that effective links are made between teaching on nutrition and health and teaching in relation to physical education. (Paragraphs 35-41)

8. Do you support the development of links between schools' food policies and the curriculum?

Yes  No

### Any other comments:

- HFfA recommend that the policy should provide greater clarity on the growing clubs and how these clubs will be funded. Also, there needs to be further clarification on how the Cook It! Programme will be adapted for children across all schools.
- HFfA recommend that the policy needs to provide training and resources for teaching staff.

### SECTION 3 – TARGETING SOCIAL NEED

The policy stresses the importance of programmes and initiatives such as free school meals, extended schools and healthy breaks being targeted at children and families from disadvantaged backgrounds. (Paragraphs 42-45)

9. Do you agree that the Food in Schools policy should address targeting social need?

Yes  No

#### Any other comments:

- Smart cards have been piloted already in Northern Ireland, and HFfA recommend that this policy should facilitate the roll-out through all schools of the best deemed mechanism i.e. smart cards so no child is stigmatised.
- HFfA recommend pupils should be targeted, rather than schools with high numbers of pupils suffering disadvantage, otherwise pupils in schools with low numbers of pupils suffering disadvantage will be overlooked. The policy's aim should be that every pupil suffering disadvantage should be supported to access direct school food provision.
- HFfA recommend consideration needs to be given to those children who are just outside the levels of receiving free school meals, as they are potentially 'at risk' of food poverty.
- HFfA recommend that the emphasis of the policy should be on the child, rather than the school.

### SECTION 4 – IMPLEMENTATION OF THE FOOD IN SCHOOLS POLICY

#### Regional Implementation

Both DE and DHSSPS have committed additional funding to supporting the implementation of the Food in Schools policy. (Paragraphs 46-49)

10. Do you consider the level of investment of £3 million per year by DE with additional funding through the Fit Futures Implementation Plan to be adequate?

Yes  No

#### Any other comments:

- £3 million is a very small amount to cover these areas. HFfA recommends that there needs to be more information on the breakdown of how this money will be spent.
- While HFfA is in agreement with a training programme for catering staff:

- Further consideration needs to be given to whether schools need new equipment, and who would be eligible for this funding.
  - Further consideration needs to be given whether a communication and marketing plan is needed in light of the current work of the Public Health Agency.
- HFfA recommend that more than one school dietitian should be employed for the whole of Northern Ireland, and this should be the main focus of the spending.

### **Local Implementation**

The policy outlines the arrangements which have been put in place at local level to provide support to schools on food and nutrition issues. It also details the legal requirements which schools must meet in relation to the promotion of the health and well-being of their staff and pupils. (Paragraphs 50-53)

11. Do you consider the arrangements which have been put in place to be adequate?

Yes  No

### **Any other comments:**

- There is still confusion in schools around the interpretation of the Nutritional Guidelines. HFfA recommend that there be a review of the current training of Nutritional Standards Coordinators to ensure that they have the necessary skills and nutritional knowledge to fully implement the guidelines.
- HFfA recommend that consideration needs to be given to the suggestion of using the range of expertise available, as it is not clear in the policy if there are gaps in the expertise how these will be supported.
- HFfA recommend that the policy needs to consider the role of community, and the support they can provide for parents.
- HFfA recommend that the policy needs to consider that there is not a standardised number of dietitians available to schools in each Trust and what impact this might have on implementing the policy in its current form.

### **Monitoring and Evaluation**

The policy outlines the arrangements which have been put in place to monitor its overall implementation. (Paragraphs 55-57)

12. Do you consider these arrangements to be adequate?

Yes  No

**Any other comments:**

- HFfA recommends that there needs to be more clarification on how the monitoring and evaluation will occur to make sure the training is effective and standards are adhered to.

## **SECTION 5 – GENERAL COMMENTS**

13. Please use this section to make any further comments on the proposed Food in Schools policy.

HFfA believes this policy has the potential to have a North-South dimension through best practices from Northern Ireland being exchanged with Republic of Ireland through all-island organisations, such as Healthy Food for All, as an all-island network, and other all-island organisations.

## SECTION 6 – EQUALITY AND HUMAN RIGHTS

The Department has carried out a screening exercise on the equality and human rights implications of the proposed Food in Schools policy. This screening has concluded that the policy does not need to be subjected to a full equality impact assessment.

14. Do you agree with this conclusion?

Yes  No

If not, please give your reasons below.

## HOW TO RESPOND

Please send your response to Community Cohesion Team, Room F26A, Department of Education, Rathgael House, Balloo Road, Bangor BT19 7PR. Responses should be sent to arrive no later than 11 December 2009.

Alternatively you may submit your response before the deadline via the online form which can be found at [www.deni.gov.uk](http://www.deni.gov.uk).

Please contact the Department if you require the response booklet in other formats:

|            |  |                |  |
|------------|--|----------------|--|
| By phone:  | 028 9127 9442  | By writing to: | Community Cohesion Team<br>Room F26A<br>Department of Education<br>Rathgael House<br>Balloo Road<br>BANGOR<br>BT19 7PR |
| By fax:    | 028 9127 9100  |                |  |
| By e-mail: | <a href="mailto:nutritional.standards@deni.gov.uk">nutritional.standards@deni.gov.uk</a> |                |  |

## PUBLICATION OF RESPONSES

The Department will publish a summary of responses following completion of the consultation process. Your response, and all other responses to the consultation, may be disclosed on request. The Department can only refuse to disclose information in exceptional circumstances. **Before** you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this consultation. The Department will handle any personal data you provide appropriately in accordance with the Data Protection Act 1998.

The Freedom of Information Act gives the public a right of access to any information held by a public authority, namely, the Department in this case. This right of access to information includes information provided in response to a consultation. The Department cannot automatically consider as confidential information supplied to it in response to a consultation. However, it does have the responsibility to decide whether any information provided by you in response to this consultation, including information about your identity should be made public or be treated as confidential.

This means that information provided by you in response to the consultation is unlikely to be treated as confidential, except in very particular circumstances. The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that:

- the Department should only accept information from third parties in confidence if it is necessary to obtain that information in connection with the exercise of any of the Department's functions and it would not otherwise be provided;
- the Department should not agree to hold information received from third parties "in confidence" which is not confidential in nature; and

- acceptance by the Department of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner.

For further information about confidentiality of responses, please contact the Information Commissioner's Office or see the website at <http://www.informationcommissioner.gov.uk>.