

## **Scottish Government**

# A Healthier Future- Action and Ambitions on Diet, Activity and Healthy Weight SOSCN Consultation response

#### **Question 1**

Are there any other types of price promotion that should be considered in addition to those listed above?

Lunchtime meal deals- often there are food and drinks included in this which have high fat, sugar or salt content. Meal deals can be particularly attractive to older children when purchasing lunch outside school.

# **Question 2**

How do we most efficiently and effectively define the types of food and drink that we will target with these measures?

It might be simplest to define them in terms of the effect that such food and drink have on children or adults through high or over consumption e.g. can cause weight gain, lead to higher risk of heart disease or diabetes- akin to the warnings about excessive alcohol consumption.

## **Question 3**

To what extent do you agree with the actions we propose on non-broadcast advertising of products high in fat, salt and sugar?

Whilst we would agree with the proposals, we wonder about the actual impact that this will have- we believe that this will be limited. Today many children and young people especially, are influenced by advertising on social media including deliberate product placement or promotion of products through videos, vlogs, blogs, instagram etc. Indeed, many companies deliberately target these (social media) social influencers to promote products, knowing the demographic of their followers.

Peer influence is also a huge factor- children want to eat and share the snacks and drinks their friends have in playgrounds.

#### Question 4

Do you think any further or different action is required for the out of home sector?

In the document, the 'out of home' sector is defined as establishments including restaurants, takeaways, sandwich shops, bakeries and coffee shops but then in 1.23 also talks about the public and voluntary sectors. Should food provided by canteens and catering services within schools, hospitals and care services etc not also be included in the 'out of home' sector?

According to current legislation, out of school care services which provide any form of snack are considered to be food outlets and as such must be registered and inspected by



environmental health similar to restaurants, takeaways etc, and so from a legal stand-point would already be considered within this sector.

If the above identified group (including out of school care) are to be included within this sector, then any strategies or guidance developed should take cognisance of existing strategies and documents which are already embedded in practice and delivery. In terms of out of school care services, we recommend that they use "Setting the Table. Nutritional guidance and food standards for early years childcare providers in Scotland" (NHS Health Scotland, 2015) and "Healthy Eating in Schools. A guide to implementing the nutritional requirements for food and drink in schools (Scotland) regulations 2008" (Scottish Government, 2008).

## **Question 5**

# Do you think current labelling arrangements could be strengthened?

We think labelling arrangements could be simplified, and easier to read and interpretsomething which children and young people would also be able to understand at a glance. Although a traffic light system is sometimes in place for Fats; Saturates; Sugar and Salts on some food products, it is not consistent across all products- sometimes it is a table or list. The information is often hard to read (the print is too small) or hard to interpret.

We would recommend that a traffic light system is employed for the food substance as a whole eg. red, recommended to eat only occasionally; amber, recommended to eat weekly; green, recommended to eat daily. The traffic light system could also be used in terms of expectation within a shopping basket e.g. 60% green, 30% amber and 10% red. We believe that a simplified and more visual labelling arrangement could be more effective.

[Please note, that the timescales and percentages are for illustrative purposes only- we would expect these to be set by dietary and nutritional experts.]

## **Question 6**

What specific support do Scottish food and drink SMEs need most to reformulate and innovate to make their products healthier?

Don't know, however, we believe that £200,000 over the next three years will have little significant impact. We would imagine that SMEs which might be operating on narrow profit margins would require significant financial support and other resources to reformulate their products whilst maintaining a successful and sustainable business.

# **Question 7**

Do you think any further or different action is require to support a healthy weight from birth to adulthood?

Yes, we believe that the role out of school care services play in supporting children's health and wellbeing term-time and more significantly, holiday time, needs to be recognised and included in any relevant actions with the wider support sector such as health and education.



There are currently 1,029 out of school care services providing care term and holiday times for nearly 80,000 children (Care Inspectorate, 2017). Out of school care services work within the Getting It Right For Every Child framework and use the Wellbeing Indicators to measure outcomes for children; for the purposes of this consultation, the most significant indicators are active and healthy. Out of school care clubs must develop overall service as well as individual child care plans based upon the wellbeing indicators and ensure the best possible wellbeing outcomes for children.

The Scottish Out of School Care Network promotes healthy eating through newsletters, social media posts and our Quality Improvement Framework: Achieving Quality Scotland. We also provide free Physical Activity and Wellbeing training sessions for out of school care services, which has proved to be very popular.

One area of concern and required action is the issue of what happens to children receiving free school meals during holiday time. We know that many families struggle to feed and actively engage children during school holidays and the Scottish Out of School Care Network would like funding made available to support such children access already existing mainstream holiday care provision (provided by registered care services such as out of school care).

For the most economically and socially disadvantaged children it is less stigmatising if they are able to attend already existing mainstream holiday services and access regular healthy food and physical activity and physical play opportunities. [We can provide examples, on request, of where this is working.] Research also shows that the most economically disadvantaged children who attend out of school activities have increased educational attainment compared to those who do not (Tanner et al, 2016)- arguably children who have been fed and active during the holidays are more "school ready" when the new term starts.

We would also request that school kitchens are opened up to schools themselves (for practical cooking sessions if no home economics rooms are available); out of school care services; other childcare services and community groups. It is often reported to us by out of school care services that they are not allowed to access kitchen space within schools or can only do so at great cost. The usual reason is that these facilities are not operated by the school or education department but contracted private companies who dictate terms of use. We would like school kitchens, when not in operation providing school meals, to become community kitchens available for use by local groups, especially out of school care services based within schools.

# **Question 8**

How do you think a supported weight management service should be implemented for people with, or at risk of developing, type 2 diabetes- in particular the referral route to treatment?

No comment.



## **Question 9**

# Do you think any further or different action on healthy living interventions is required?

As per our answer to question 7, we believe that additional funding should be made to support children and families who receive school meals during holiday-time as well as term-time- food poverty lasts 52 weeks of the year. Furthermore, additional food support should be available to the whole family if school-age children are receiving free school meals; this too should be year-round and include weekends. Food poverty is also not just about being able to buy fresh ingredients- it is about having the appropriate amenities to cook (including access to affordable gas and electricity).

The costs of providing nutritious healthy food extend beyond just being able to access fresh and healthy ingredients- it may not be a lack of knowledge but a lack of overall resources within the home which prevents families having healthier diets.

## **Question 10**

How can our work to encourage physical activity contribute most effectively to tackling obesity?

As previously highlighted in our answer to question 7, out of school care services play an important role in delivering physical activity opportunities to children through outdoor and indoor physical activities and play opportunities term-time and holiday-time. However, many out of school care services would further benefit from inclusion in existing programmes such as Active Schools: currently they are too often ignored or denied access since they are not a statutory service and not on the wider public-sector radar.

#### Question 11

What do you think about the action we propose for making obesity a priority for everyone?

Public sector employers must lead the way in encouraging their workforce to lead healthier lives through various incentives e.g. discounted gym membership, discounted nutritious catering in canteens, workplace physical activity classes. The impact of any such initiatives should be monitored to see if it has an improved effect on employee physical and mental health by looking at reduced number of days lost to ill health. If the public sector can prove that such actions have a cost benefit, then it will be easier to promote such initiatives to the private sector in particular. Whilst awards are recognition of commendable practice, it is often not until there is a tangible financial benefit that schemes are widely taken up.

# **Question 12**

How can we build a whole nation movement?

In the first instance, this requires strong public leadership.

## **Question 13**

What further steps, if any, should be taken to monitor change?



Whilst we understand the benefits of tests of change, these are good for short-term and immediate gains. As much of what is talked about in this consultation is change through education, some of the impacts are generational and long-term, so long-term goals also need to be set and monitored through a commitment to longitudinal research. It might be possible to tie this in with current longitudinal research such as Growing Up in Scotland which is following different cohorts of children from the early years, through childhood and beyond.

## **Question 14**

Do you have any other comments about any of the issues raised in this consultation?

No.