

CONSULTATION DOCUMENT

Draft Update to Nutritional Standards for School Food

January 2020



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MINISTER'S FOREWORD

This consultation is intended to seek your views on a proposed update to the nutritional standard of all food provided in grant-aided schools.

The Nutritional Standards for School Lunches and Other Food and Drinks in Schools were developed in keeping with government guidance on healthy eating in 2007. In the 12 years since these standards were developed, evidence and research has emerged that indicates we should consume more fruit, vegetables and dietary fibre while reducing the amount of sugar, salt, fat and processed meat in our diets. It is important that we update the existing Nutritional Standards to ensure that all food provided in grant-aided schools is in keeping with up-to-date government guidance on healthy eating.

Research shows that having a healthy diet can have a critical role in cognitive development. Providing a nutritious school meal can increase pupils' concentration levels during afternoon lessons which can help close the performance gap and reduce inequality.

The benefits of a healthy diet are well known and can not only help maintain a healthy weight but can reduce the risk of tooth decay, chronic diseases such as Type 2 diabetes, coronary heart disease and some cancers. It can also help improve the mental wellbeing of children and young people by increasing self-esteem and improving mood.

Updating the Nutritional Standards will come at a cost and I will want to carefully consider the costs in light of the overall budget, however, the benefits to children and young people from having good, nutritious school meals is well known and it is important therefore that your views on the updated Nutritional Standards are made known including how the costs might be covered.



Peter Weir MLA
Minister for Education

January 2020



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1. BACKGROUND

- 1.1 The Nutritional Standards for School Lunches and Other Food and Drinks in Schools were developed in 2007 to ensure that all food provided in all grant-aided schools* reflects government guidance on healthy eating. This was initially articulated in the Balance of Good Health which became known as the Eatwell Plate. The Eatwell Plate was updated to reflect up-to-date research and government guidance on healthy eating and is now known as the Eatwell Guide.
<https://www.gov.uk/government/publications/the-eatwell-guide>
- 1.2 The Eatwell Guide is a policy tool, produced by Public Health England in association with the Welsh Government, Food Standards Scotland and Food Standards Agency (FSA) in NI, used to define government recommendations on eating healthily and achieving a balanced diet.
- 1.3 As a result, the current Nutritional Standards as outlined in the Annex to the Department's Arrangements for the Provision on Milk, Meals and Related Facilities, require updating to reflect this and other current government guidance on healthy eating.
<https://www.education-ni.gov.uk/publications/milk-and-meals-arrangements-education-authority-voluntary-grammar-and-grant-maintained>

2. STRATEGIC CONTEXT

- 2.1 In response to concerns about childhood obesity, the Executive developed a childhood obesity prevention strategy known as A Fitter Future in 2006. This later became part of the Executive's life course obesity prevention strategy A Fitter Future for All 2012-2022. In addition, research¹ demonstrates that nutrition has a critical influence on cognitive development and academic performance in children and adolescents. Poor diet is detrimental to children's development, learning, concentration and behaviour and is not in keeping with Department of Education's corporate goals, in particular – Improving the wellbeing of children and young people and closing the performance gap, increasing access and equality.

* Grant-aided in Northern Ireland are all schools other than Independent Schools. The terms 'grant-aided', 'schools' and 'independent schools' are interpreted in Article 2 of the Education and Libraries (NI) Order 1986.

1 <https://discovery.ucl.ac.uk/id/eprint/10015414/1/WBLResRep18.pdf>



- 2.2 The provision of healthy nutritious food in schools makes a positive contribution to achieving the outcomes in the draft Children and Young People's Strategy and the draft Programme for Government.
- 2.3 'Healthy Food for Healthy Outcomes – Food in Schools policy' is a joint Department of Education and Department of Health policy which has been in place since 2013 and applies to all grant-aided schools. It is an overarching policy advocating a 'whole-school approach' to all food provided and consumed in schools and to developing knowledge and skills in relation to healthy eating and lifestyles.
<https://www.education-ni.gov.uk/publications/healthy-food-healthy-outcomes>
- 2.4 The Nutritional Standards are the key mandatory element of the Food in Schools policy. The Nutritional Standards for School Lunches have been compulsory for all grant-aided schools since September 2007. In April 2008, the Nutritional Standards were extended to include all food and drink in school such as breakfast clubs, tuck shops and vending machines. Due to a gap in legislation these are not compulsory in certain circumstances and this is discussed further in section 9.7. It is recommended however that all grant-aided schools should seek to adhere to the Nutritional Standards for Other Food and Drinks in Schools in line with the 'whole school approach' advocated in the Food in Schools policy.
- 2.5 The Food in Schools policy, in particular the mandatory Nutritional Standards, is this Department's major contribution to the Executive's obesity prevention strategy, A Fitter Future for All. It also contributes to a number of draft Programme for Government outcomes including outcome 4 – We enjoy long, healthy and active lives and Outcome 12 – We give our children and young people the best start in life.

3. SCHOOL MEALS

- 3.1 School meals must be provided each school day. The provision of school meals is an essential service to pupils who are entitled to a free school meal and to other pupils who wish to avail of it. Free school meals are provided to ensure pupils from low income families have access to a nutritionally balanced meal suitable as the main meal of the day.
- 3.2 Information on school meals is collected in October each year through the School Meals Census for all grant-aided schools in Northern Ireland. On School Meals Census day

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(5 October 2018) over 185,000 meals, both free and paid, were taken by pupils. This equates to a school meals uptake level of 59.4% of pupils present for lunch that day.

<https://www.education-ni.gov.uk/articles/school-meals-statistical-bulletins>

- 3.3 On School Meals Census day 2018 the number of pupils entitled to a free school meal was 99,142. This equates to 29.3% of pupils. The uptake of free school meals by entitled pupils was 80.5%.
- 3.4 Pupils from the least affluent schools as measured by Free School Meal Entitlement (FSME), were more likely to take a school meal. For both primary and post-primary schools, the uptake of school meals was lowest in schools where 10% or less of the pupils enrolled were entitled to free school meals. Uptake increased as the level of FSME increased eg. 69.6% of pupils in primary schools with 40% or more FSME took a school meal compared to 43.7% in primary schools with 10% or less FSME.
- 3.5 All school meals must comply with the Nutritional Standards for School Lunches (2007). It is clear that providing healthy school meals can have a positive impact on pupils' health. It is essential therefore that these Nutritional Standards are updated to ensure that school meals meet current government guidance on healthy eating.

4. OTHER FOOD AND DRINKS IN SCHOOLS

- 4.1 Schools may also provide other sources of food and drinks for example breakfast clubs, break time service, tuck-shops or vending machines. Where a school provides these, either through its school meals service or otherwise, it is recommended that all grant-aided schools should seek to adhere to the Nutritional Standards for Other Food and Drinks in Schools.
- 4.2 It is essential therefore that these Nutritional Standards are updated to ensure that all food and drinks provided in schools meet current government guidance on healthy eating. The Department is also seeking to make these updated Nutritional Standards compulsory in all grant-aided schools. This is discussed further in Section 9.7.

5. POSITION IN GREAT BRITAIN (GB) AND REPUBLIC OF IRELAND (ROI)

- 5.1 Whilst all GB countries have Nutritional Standards for school food they do vary as to whether they are food based similar to Northern Ireland or both food and nutrient based.



They are all however broadly in keeping with the draft updated Nutritional Standards proposed in this consultation.

- 5.2 The [School Food Standards](#) in England are food-based and define the foods and drinks that must be provided, which foods are restricted, and those, which must not be provided. They apply to all food and drink provided to pupils on and off school premises and during an extended school day (up to 6pm), including school trips, breakfast clubs, tuck shops, mid-morning break, vending and after school clubs.

[Departmental advice](#) is available on gov.uk. A [summary](#) of the standards and a [practical guide](#) are available from the school food plan website.

The Standards came into force in January 2015 – the Standards are also being updated this year to bring them into line with more up-to-date nutritional advice.

- 5.3 The Scottish Government recently reviewed its existing School Food and Drink Regulations (Scotland) 2008, to provide evidence based recommendations to progress school food further towards the Scottish Dietary Goals. They plan to implement these changes in 2020. Scottish school food standards are both nutrient and food based and so differ with Northern Ireland in requirements for food provided and monitoring, as menus require nutritional analyses. A link to the current regulations can be found at:

<https://www.legislation.gov.uk/sdsi/2008/9780110816456/contents>

- 5.4 The Healthy Eating in Schools (Nutritional Standards and Requirements) (Wales) Regulations 2013 set out nutrient based nutritional standards for an average school lunch and food and drink requirements throughout the school day. The food and drink requirements describe the types of food and drink that must be provided, restricted and not permitted. The Welsh Government produced Statutory Guidance for Local Authorities and Governing Bodies in 2014 which supports the implementation of both the regulations and the Healthy Eating in Schools (Wales) Measure 2009.

The Welsh Government has made a commitment to update the regulations and will be considering the latest research and information concerning nutritional standards when undertaking this task

A link to the regulations is herewith:-

<http://www.legislation.gov.uk/wsi/2013/1984/contents/made>

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- 5.5 The Republic of Ireland published Nutrition Standards for School Meals in September 2017. These are food-based Nutrition Standards adapted from the current Nutritional Standards in Northern Ireland. These standards apply to meals provided under the School Meals (Local Projects) Scheme. The Scheme provides funding to primary and post-primary schools, local groups, voluntary organisations and community-based not-for-profit preschools operating their own school meals projects.
<https://assets.gov.ie/15978/6ade4b9f4810445e8c6516b3a33d330b.pdf>

6. POLICY, ADMINISTRATION AND DELIVERY

- 6.1 The Department is responsible for the policy in relation to school meals and providing funding for free school meals. The Education Authority has responsibility for the day to day operation of the school meals service, including the provision of free school meals, in the controlled and maintained sectors. Voluntary Grammar Schools and Grant Maintained Integrated Schools are individually responsible for providing school meals.

7. AIMS AND OBJECTIVES OF THE UPDATED STANDARDS

- 7.1 The primary objective is to ensure that all food provided in schools is in keeping with current government guidance on healthy eating. The school environment can have a significant influence on the health behaviours of children and young people, in particular their food choices. It is clear that providing healthy food in schools can have a positive impact on pupils' health and cognitive development.
- 7.2 To ensure that children and young people benefit from healthier food choices as soon as possible the Department aims, subject to the outcome of this consultation and the availability of funding, to have the updated Nutritional Standards in place in all grant-aided schools by September 2020.
- 7.3 Providing healthy food choices in schools can only benefit those pupils that avail of it. Therefore the Department and school catering services will work together to maximise uptake of school meals following the introduction of updated Nutritional Standards.
- 7.4 The Department also aims to ensure that the Nutritional Standards apply equally to all food provided by all grant-aided schools and is taking steps to put in place arrangements to monitor implementation of the updated Nutritional Standards.



- 7.5 In all other respects the Nutritional Standards will remain unchanged. For example they will continue to provide for special dietary requirements as a result of a disability, medical condition or allergy or for religious and cultural beliefs.

8. CURRENT NUTRITIONAL STANDARDS

- 8.1 Over the past decade considerable effort has been directed at improving the nutritional value of school lunches. The current Nutritional Standards for School Lunches and Other Food and Drink in Schools, developed in 2007 and based on the former Eatwell plate, are well embedded in schools demonstrating the significant progress which has been made.
- 8.2 It is important however to ensure that the Nutritional Standards remain current, taking into account the most recent evidence and changes in recommendations such as the Eatwell Guide², the Scientific Advisory Committee on Nutrition (SACN) reports on Carbohydrate and Health³ and Saturated Fats and Health⁴; the Public Health England sugar⁵ and salt reduction targets⁶, and the World Cancer Research Fund report linking processed meat and cancer⁷.

Recommendations of the Eatwell Guide

- 8.3 The Eatwell Guide shows the different types of foods and drinks we should consume – and in what proportions – to have a healthy balanced diet:
- ☑ Eat at least 5 portions of a variety of fruit and vegetables every day
 - ☑ Base meals on potatoes, bread, rice, pasta or other starchy carbohydrates; choosing higher fibre wholegrain versions where possible
 - ☑ Have some dairy or dairy alternatives (such as soya drinks); choosing lower fat and lower sugar options

2 <https://www.gov.uk/government/publications/the-eatwell-guide>

3 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445503/SACN_Carbohydrates_and_Health.pdf

4 <https://www.gov.uk/government/publications/saturated-fats-and-health-sacn-report>

5 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/604336/Sugar_reduction_achieving_the_20_.pdf

6 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/604338/Salt_reduction_targets_for_2017.pdf

7 http://www.wcrf.org/sites/default/files/CUP%20Colorectal%20Report_2017_Digital.pdf

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- ☑ Eat some beans, pulses, fish, eggs, meat and other proteins (including 2 portions of fish every week, one of which should be oily)
- ☑ Choose unsaturated oils and spreads and eat in small amounts
- ☑ Drink 6–8 cups/glasses of fluid a day
- ☑ If consuming foods and drinks high in fat, salt or sugar have these less often and in small amounts.

8.4 The Eatwell Guide applies to most people regardless of weight, dietary restrictions/ preferences or ethnic origin. However, it does not apply to children under 2 because they have different nutritional needs. Between the ages of 2 and 5, children should gradually move to eating the same foods and in the proportions shown on the Eatwell Guide.

9. PROPOSED UPDATES TO NUTRITIONAL STANDARDS

9.1 Fruit and vegetables

The Eatwell Guide recommends that fruit and vegetables should make up just over a third of the food we eat each day however research shows that children in Northern Ireland consume too few fruit and vegetables⁸. Fruit is incorporated into many school initiatives such as breakfast clubs and break time snack schemes which take place currently. Vegetables on the other hand tend to only be available at lunchtime.

Proposed Update 1:

- Increase the daily availability of vegetables to no fewer than 2 portions as well as 1 portion of fruit, per child, throughout the lunch service.

Q1 Do you agree with the change(s) proposed above aimed at increasing the availability of fruit and vegetables?

8 https://www.food.gov.uk/sites/default/files/media/document/national-diet-and-nutrition-survey-northern-ireland-y5-9-full-report_1.pdf



9.2 Fibre

Starchy food is an important part of a healthy diet and should make up just over a third of the food we eat. Overall, 94-98% of the Northern Ireland population is not meeting the recommendations for fibre consumption. Wholegrain food contains more fibre than white or refined starchy food, and often more of other nutrients. The SACN report on carbohydrates and health also found that both dietary fibre and wholegrains were associated with a lower risk of cardiovascular disease as well as having beneficial effects on a number of other health outcomes.

Proposed Update 2:

- New Standards that rice and pasta should be wholegrain or a higher fibre version, and 50% of bread and sandwiches available should be wholegrain or higher fibre versions.
- New information in the Standards to increase the availability of beans, pulses and other proteins.

Q2 Do you agree with the change(s) proposed above aimed at increasing the availability of fibre?

9.3 Fat

The Eatwell Guide recommends to choose foods lower in fat, to eat smaller amounts and to eat foods high in fat less often. The SACN report on saturated fat and health also concluded that saturated fats in the diet should be replaced with unsaturated fats due to the evidence indicating higher saturated fat consumption is linked to raised blood cholesterol and increased risk of heart disease. Average intakes of saturated fatty acids currently exceed the current recommendation of no more than 11% of food energy providing 12.7-13.3% of food energy for children in Northern Ireland aged 4 years upwards.

Proposed Update 3

- New Standards for 'Oils and Spreads' to use only unsaturated cooking oils and fat spreads.

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- Reduced frequency of fried and other high fat foods offered, from two days to one day per week, in a primary school.
- Increased number of days without any processed or fried and other high fat foods available in a primary school, from two days to three days per week.
- Reduction of processed red meats e.g. bacon, cooked ham, gammon etc. to be reduced to once per week in a primary school, and twice per week in a post primary school.
- Processed, fried and other high fat food items restricted to lunchtime, to encourage healthier morning break services.

Q3 Do you agree with the change(s) proposed above aimed at reducing the availability of saturated fat?

9.4 Sugar

Regularly consuming foods and drinks high in sugar increases a child's risk of obesity and tooth decay. Children's intakes of free sugars currently exceed the recommendation of no more than 5% of total energy from free sugars. The Eatwell Guide therefore recommends to eat these foods less often and in small amounts.

Proposed Update 4

- Cakes, biscuits and pudding desserts are limited to twice per week and should meet Public Health England (PHE) sugar reduction targets. (Fruit and a dairy-based dessert must be available every day to continue to adhere to the fruit and vegetables and dairy standards, and ensure there are still opportunities for pupils to avail of fruit and calcium and Vitamin D-rich foods).
- Reduce portion size of unsweetened fruit juices and smoothies to max 150ml.
- Change to no added-sugar flavoured milk with new portion size of max 200ml.
- Removal of table sugar, jam, honey and marmalade available to add to food.



- Reduced frequency of condiments (eg ketchup and other sauces) available to twice per week and with a maximum portion size of 10g/ml.
- Pancakes and scones available at all food services throughout the day meet the following criteria for sugar content and portion size:
 - ✓ Max 10g sugar per 100g;
 - ✓ Made using unsaturated fat and low-fat dairy;
 - ✓ Max portion size 50g primary/60g post primary.

Q4 Do you agree with the change(s) proposed above aimed at reducing the availability of sugar?

9.5 Salt

The Eatwell Guide recommends to cut down on salt as eating too much salt can raise blood pressure, increasing the risk of developing heart disease or stroke. Adults should eat no more than 6g of salt a day, and children should have even less.

Proposed Update 5

- Removal of salt to add to food after preparation, at any stage throughout the day.
- Reduced frequency of condiments (eg ketchup and other sauces) available to 2 days per week, with a maximum portion size of 10g/ml.
- Reduced frequency of processed red meats will contribute to salt reduction (see proposal 6.)

Q5 Do you agree with the change(s) proposed above aimed at reducing the availability of salt?

9.6 Processed Red Meat

The World Cancer Research Fund has reported clear evidence of a causal link between red and processed meat and cancer. It states that risk increases with increased consumption and so, efforts to reduce intake must be considered if current consumption is high. Research data for Northern Ireland shows that boys aged 11–18 are eating more red and processed meat compared to the maximum recommended amount.

It may be obvious that meat and chicken come under the Eatwell category 'Beans, pulses, fish, eggs, meat and other proteins'. While this is true, some foods are classed as processed meat, or meat or chicken products, due to their processed nature and high saturated fat and salt content. These types of food are therefore included in the 'Foods to eat less often and in small amounts' section.

The Eatwell Guide uses the term processed meat to include sausages, bacon, cured meats and reformed meat products. The World Cancer Research Fund provides examples of processed meat, which the consumption of can cause cancer. They include hot dogs, ham, sausages, corned beef and biltong or beef jerky as well as canned meat and meat-based preparations and sauces. For the purpose of these standards, as the majority of these examples are red meats, the term 'processed red meat' has been used.

Proposed Update 6

- That the availability of processed red meats, eg. bacon, cooked ham, gammon etc be reduced to once per week in a primary school and twice per week in a post primary school and that processed red meats and meat or chicken products are only made available at lunch times.

Q6 Do you agree with the change(s) proposed above aimed at reducing the availability of processed red meat?

9.7 Mandatory Nutritional Standards for Other Food and Drinks in Schools in all grant-aided schools

The Nutritional Standards for School Lunches have been mandatory in all grant-aided schools since 2007. Due to a gap in the existing legislation the Nutritional Standards for Other Food and Drinks are not mandatory at present in controlled and maintained



schools where food is provided by the school (rather than the Education Authority) through tuckshops, vending machines etc. The Department recommends that all grant-aided schools should seek to adhere to these Standards however we are aware that while many do there remains some schools that do not. The Department would like to ensure that all food and drinks provided in all grant-aided schools meet these Nutritional Standards.

Proposal 7

It is proposed that the Nutritional Standards for Other Food and Drinks should become mandatory in all grant-aided schools and apply equally to all food provided in the school setting.

Q7 Do you agree the Nutritional Standards for Other Food and Drinks should become mandatory in all grant-aided schools and apply equally to all food provided in the school setting?

9.8 Independent Monitoring of Implementation of the Nutritional Standards

The Department is responsible for monitoring the implementation of the Nutritional Standards in all grant-aided schools to ensure that all children and young people who avail of food and drinks in school benefit from the opportunity to eat a healthy balanced diet.

From January 2007 to March 2011 the Education and Training Inspectorate's nutritional associates made observations during inspections and reported to the Department on progress made by schools in implementing the Nutritional Standards and general approaches to healthy eating. The nutritional associates also provided advice to the Department on examples of good practice and barriers to the implementation of the Nutritional Standards so that it could direct the necessary support to schools and school caterers.

Since 2011 the Education Authority school catering service has been reporting regularly to the Department on compliance with the Nutritional Standards in controlled, maintained and special schools and grant maintained integrated schools where the Education Authority provides the school meals service. This includes highlighting to the Department examples of good practice and barriers to the implementation of the Nutritional Standards some of which has helped inform this consultation.

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Individual schools are encouraged to self-monitor and have been provided with a checklist to assist. The Department does not monitor these.

Proposal 8

It is proposed that monitoring and evaluation and support arrangements independent of schools and school caterers are established to provide support and advice to ensure the updated Nutritional Standards are being implemented equally in all grant-aided schools, to highlight examples of good practice as well as barriers to implementation and to ensure that all children and young people who avail of food and drinks in school benefit from the opportunity to eat a healthy balanced diet.

Q8 Do you agree that independent monitoring and evaluation arrangements should be established to ensure the updated Nutritional Standards are being implemented in all grant-aided schools?

9.9 Potential increase in the cost of a school meal

As a consequence of updating the Nutritional Standards to ensure that school meals are in keeping with the latest government guidelines and available evidence on healthy eating, we anticipate that there may be a price increase of around 5 to 7 pence per meal for food costs. Currently the cost of a school meal in nursery school is £2.50, in primary school £2.60 and in post primary £2.80.

It is estimated that an additional £1.7-£2.4 million per annum would be required to implement the updated Nutritional Standards in all schools. Subject to the outcome of this consultation, the Department would seek to make a robust case to secure additional funding to meet this increased cost. However it is recognised that in the current budgetary climate this would be challenging and that the additional cost may have to be passed on to paying pupils or the updated Nutritional Standards may have to be delayed until such times as funding becomes available.

Q9. In the absence of funding, do you think it would be reasonable to increase the price of a school meal for paying pupils by around 5 to 7 pence a meal to ensure a September 2020 implementation?



9.10 Next Steps

At the end of the consultation period seeking views on the draft updated Nutritional Standards for School Food, the Department will produce and publish an analysis report of responses received. The Department will consider the views expressed and options for the way forward. It is planned, subject to the outcome of this consultation and the availability of funding, that these changes will be implemented with effect from September 2020.

10. RESPONDING TO THIS CONSULTATION

- 10.1 This consultation is available on the Department of Education website at <https://www.education-ni.gov.uk/consultations>
- 10.2 Comments using the response form available on the web link above can be sent by email or posted to the address below. Responses should be submitted to arrive no later than 5pm on 27 March 2020.

Email: nutritional.standards@education-ni.gov.uk

By post to: Food in Schools Team
Department of Education
Room 6.06 Rathgael House
43 Balloo Road
Rathgill
Bangor
BT19 7PR

11. PRIVACY, CONFIDENTIALITY AND ACCESS TO CONSULTATION RESPONSES

- 11.1 Any information you provide for the purposes of this consultation will be used only for the intended purpose. We will not share your personal data with any third party. Any specific requests from a third party for us to share your personal data with them will be dealt with in accordance the provisions of data protection legislation. We may publish individual responses or a summary of responses but all personal information will be redacted. We will retain consultation and survey response information until our work on

the subject matter for the consultation is complete, in keeping with the DE destruction policy.

- 11.2 Your response, and all other responses to this consultation, may also be disclosed on request in accordance with the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR). However, all disclosures will be in line with the requirements of the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR) (EU) 2016/679. If you want the information that you provide to be treated as confidential it would be helpful if you could explain to us why you regard the information you have provided as confidential, so that this may be considered if the Department should receive a request for the information under the FOIA or EIR.

12. EQUALITY IMPACT ASSESSMENT

- 12.1 Section 75 of the Northern Ireland Act 1998 requires all public authorities in carrying out their functions relating to Northern Ireland, to have due regard to the need to promote equality of opportunity between:
- ☒ persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
 - ☒ men and women generally;
 - ☒ persons with a disability and persons without; and
 - ☒ persons with dependants and persons without.
- 12.2 In addition, without prejudice to the above obligation, public authorities must also, in carrying out their functions, relating to Northern Ireland, have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.
- 12.3 The proposals in this consultation have been considered in the context of Section 75(1) and Section 75(2) of the NI Act 1998 and have been screened out.



- 12.4 The proposals when implemented will ensure that all food and drinks provided in grant-aided schools will be in line with current government guidance and best evidence on healthy eating. They will have a positive impact on the health and wellbeing of all pupils that avail of school meals, including those entitled to free school meals, and other food and drinks provided in grant-aided school.
- 12.5 Further, it is considered that the proposal will not have a detrimental impact on human rights or upon those living in rural areas.
- 12.6 A copy of the screening document is available on the Department of Education website at www.education-ni.gov.uk/de-equality-screenings.

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Consultation on the Draft Update to Nutritional Standards for School Food

This response has been prepared by the Northern Ireland Food Managers Group (NIFMG) on behalf of Environmental Health Northern Ireland (EHNI).

Document: <https://www.education-ni.gov.uk/consultations>

Response submission: Via online form available at above link.

Alternatively, paper copies can be obtained by contacting the Department of Education:
By Phone: 02891 279852

By e-mail: nutritional.standards@education-ni.gov.uk

By writing to: Food in Schools Team
Department of Education
Room 6.06
Rathgael House
43 Balloo Road
Bangor BT19 7PR

Closing Date: 27th March 2020

Mid Ulster District Council welcomes the opportunity to comment on the draft update to Nutritional Standards for school food.

Q1 Do you agree with the change(s) proposed above aimed at increasing the availability of fruit and vegetables?

Yes. Mid Ulster District Council agrees with the proposed changes to increase availability of fruit and vegetables but recognises that cooking methods can greatly impact on the overall nutritional content of the fruit and vegetable served. i.e. steaming as opposed boiling.

Q2 Do you agree with the change(s) proposed above aimed at increasing the availability of fibre?

Yes. Mid Ulster District Council agrees with the proposed changes to increase availability of fibre.

Q3 Do you agree with the change(s) proposed above aimed at reducing the availability of saturated fat?

Yes. Mid Ulster District Council agrees with the proposed changes aimed at reducing availability of saturated fat.

Q4 Do you agree with the change(s) proposed above aimed at reducing the availability of sugar?

Yes. Mid Ulster District Council agrees, however, reformulation to provide alternative means of sweetening pancakes and scones should be explored to ensure these foods remain appetising to children.

It is acknowledged that the monitoring of a maximum portion of 10 ml of condiment will be challenging.

Breakfast cereals can have a high sugar content therefore it would be worthwhile also setting criteria for the sugar content of breakfast cereals on offer at school breakfast clubs.

Q5 Do you agree with the change(s) proposed above aimed at reducing the availability of salt?

Yes. Mid Ulster District Council agrees. Again it is acknowledged that the monitoring of a maximum portion of 10 ml of condiment will be challenging.

Q6 Do you agree with the change(s) proposed above aimed at reducing the availability of processed red meat?

Yes. Mid Ulster District Council agrees with the proposed changes aimed at reducing availability of processed red meat.

Q7 Do you agree the Nutritional Standards for Other Food and Drinks should become mandatory in all grant-aided schools and apply equally to all food provided in the school setting?

Yes. Mid Ulster District Council agrees.

Q8 Do you agree that independent monitoring and evaluation arrangements should be established to ensure the updated Nutritional Standards are being implemented in all grant-aided schools?

Yes. Mid Ulster District Council agrees that independent monitoring and evaluation is essential to ensure consistent implementation of the updated Nutritional Standards in schools. Any changes to the level of school meal uptake following implementation of the updated Nutritional Standards should be included in any monitoring and evaluation undertaken.

Q9. In the absence of funding, do you think it would be reasonable to increase the price of a school meal for paying pupils by around 5 to 7 pence a meal to ensure a September 2020 implementation?

Consideration should be given to the impact on food poverty levels as a result of any proposed increase in school meal costs and regard given to any local and regional strategies on food poverty before doing so.

A potential impact of the revised standards and any associated price increase is that it may result in an increased uptake of school packed lunches. These currently sit outside the scope of the updated Nutritional Standards. Although it is recognised that many schools have healthy packed lunch policies, some do not and an increased uptake could have an overall detrimental effect on the diets of children. Therefore healthy packed lunch policies should be encouraged in all schools.

A media campaign aimed at parents around the implementation and content of the updated Nutritional Standards would increase awareness of the benefits of a healthy diet and could have a positive impact on the content of packed lunches and meals prepared at home.