

School meals: advice on the role of inspection in monitoring school meal standards



Arolygiaeth Ei Mawrhydi dros Addysg
a Hyfforddiant yng Nghymru

Her Majesty's Inspectorate
for Education and Training in Wales



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- ▲ adult community-based learning;
- ▲ youth support services;
- ▲ LEAs;
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Introduction

Purpose of this advice

- 1 This advice concerns:
 - the extent to which current inspections consider the standard of school meals; and
 - the potential in Wales for a wider role for inspection in monitoring school meal standards in order to mirror developments in Scotland and England and inform the work of the Food in Schools Working Group (see paragraph 8 for explanation).

Background

- 2 The Welsh Assembly Government is determined to secure, maintain and improve the health of young people in Wales. Because good diet is important to both school performance and health, a range of initiatives are being introduced to improve standards of food and nutrition in schools, including:
 - the Welsh Network of Healthy School Schemes;
 - primary school free breakfasts;
 - fruit tuck shops;
 - water coolers; and
 - key stage 1 school milk scheme.
- 3 Taking a whole-school approach to improving pupils' health is one of the key themes of the food and fitness action plan¹.
- 4 The Welsh Assembly Government has funded a study jointly with the Food Standards Agency to examine what food choices pupils make in school and why, what nutritious foods they would like to eat, and what factors influence their choice.
- 5 The Education (Nutritional Standards for School Lunches) (Wales) Regulation 2001 define the food groups and set out the daily minimum nutritional standards for primary and secondary school pupils. The Welsh Assembly Government has also issued guidance 'Nutritional Standards for School Lunches' Circular 03/2002. It recognises that the guidance needs to be reviewed and that the standards need to be made more stringent. At present, the law only allows standards to be set for school lunches. The Welsh Assembly Government has no power to ban particular foods from school lunches.

¹ Health Challenge Wales – Action on food and fitness for children and young people. Welsh Assembly Government 2005

- 6 Part 6 of the Education and Inspections Bill (2006) has a section on food and drink provided on school premises. The section states that regulations may prescribe:
- nutritional standards or other nutritional requirements of any food and drink;
 - the provision of free drinking water; and
 - that certain food and drink are not to be provided.
- 7 In addition the Bill states that LEAs no longer must charge for school meals, but may do so.

Food in Schools Working Group and 'Appetite for Life'

- 8 The Welsh Assembly Government established the independent Food in Schools Working Group in July 2005. This had the task of examining how to improve the quality and nutritional standards of school meals, and how to ensure a consistent and coherent approach to driving forward improvements in food and nutrition in schools. The group issued a consultation document, 'Appetite for Life', in June 2006. The period of consultation ends in October 2006.
- 9 In 'Appetite for Life', the group identifies standards for food, drink and nutrients and sets out 41 proposals including that:
- by September 2008, schools must meet all the food standards for school meals and the proposals for other food and drink;
 - new school meal nutrient standards are to be introduced from September 2008 followed by a one-year implementation period (2008-2009) for primary schools and a two-year implementation period (2008-2010) for secondary schools;
 - snack provision must have clear nutritional benefit and sales of confectionary, cereal bars and savoury snacks such as crisps 'should be prohibited';
 - the Welsh Assembly Government should produce software to analyse menus and to use as a basis for monitoring;
 - schools should have a whole-school food policy;
 - there should be improvements in the training and development of catering staff; and
 - the National Curriculum should give enough attention to food and nutrition issues.

- 10 The consultation document contains a section on monitoring and evaluation. This envisages two levels of monitoring – self-monitoring and external monitoring. The document sets out a role for Estyn in external monitoring and proposal 39 describes the purpose of this advice document:

‘The Welsh Assembly Government to seek initial advice from Estyn on the extent to which current inspections consider the standards of school lunches. Beyond this, separate advice should be sought on the potential to mirror in Wales developments proposed in Scotland and England that envisage a wider role for inspection in the monitoring of school meal standards’.

Work in Scotland and England

- 11 There has been a great deal of work on healthy eating and school meals over a number of years in Scotland through the ‘Hungry for Success’ initiative. More recently in England, the School Meals Review Panel published a report called ‘Turning the Tables’ that looked at the development and implementation of nutritional standards for school meals. In Scotland inspections by HM Inspectorate of Education (HMIE) are used as part of the process of monitoring and evaluating the Hungry for Success initiative, while in England the Education Secretary has announced that Ofsted will inspect school meals. Ofsted expect schools to present evidence to inspectors about their general approach to food and healthy eating and more specifically about the standard of school meals.

Summary

- 12 In each school inspection in England, inspectors evaluate and report on the school's work in promoting and enabling healthy eating and drinking. In March 2006, Ofsted carried out a small-scale survey on healthy eating in preparation for a major survey to be carried out in 2006-2007. HMI were accompanied by nutritionists appointed by the Food Standards Agency.
- 13 In Scotland, nutrition experts have accompanied HMI on about a quarter of primary school inspections and all special school inspections in order to evaluate the implementation of Hungry for Success. There are plans to increase the number in primary schools and to introduce the same process in about three-fifths of secondary schools. A report of progress in primary and special schools based on these evaluations was published in October 2005.
- 14 Whereas the inspection cycle regime in England is broadly the same as that for Wales, the regime in Scotland is significantly different. In particular, Scotland does not inspect every school over a specific period of time. By comparison, in Wales, schools are inspected every six years. A comparable commitment to using nutritional experts in Wales would add significantly to the costs of inspection, involving the use of additional specialists on all inspections in the cycle (Estyn inspects approximately 300 schools a year).
- 15 At present there is no direct inspection of school meals in Wales as part of the routine inspection of schools. However, inspectors do evaluate how schools assure the healthy development, safety and well-being of learners as well as how well pupils develop their personal, social and learning skills. Estyn already provides separate guidance to inspectors on how to inspect physical activity and healthy living.
- 16 Over the period from 2006 to 2012, Estyn will inspect all aspects of local authorities' education services, including the provision and administration of school meals services. This will be inspected whenever Estyn inspects a local authority's support services for schools.

Recommendations and proposal

- 17 We recommend that the Welsh Assembly Government should ask Estyn to carry out a baseline survey into healthy eating and drinking, as part of its remit during the period from April 2007 to March 2008. The remit should ask Estyn to make use of specialists in food nutrition, home economics and catering and work with the Food Standards Agency (FSA) to design and carry out a survey of current standards in school meals.
- 18 In addition, we propose that Estyn will inspect the school's work in promoting and enabling healthy eating and drinking as an element of routine school inspections from April 2007. In order to do this, we will:
- introduce a new evaluation requirement about healthy eating and drinking in our inspection guidance handbooks for schools;
 - require inspectors to report in each inspection report on how well the school encourages and enables healthy eating and drinking;
 - provide supplementary guidance for inspectors on how to inspect healthy eating and drinking; and
 - encourage schools to include in their self-evaluations how they promote healthy eating and drinking, including reporting on the quality of school meals using the agreed food and nutritional standards.

Inspecting school meals in England and Scotland

England

- 19 In England, the new inspection arrangements introduced in September 2005 are closely linked to the Every Child Matters² agenda. In each inspection, inspectors expect schools to present evidence as part of their self-evaluation about their general approach to food and healthy eating and more specifically about the standard of school meals. In reports, Ofsted inspectors provide a brief and general comment on this in the section of the report that is concerned with learners' achievements. For example, one typical comment in a report states that **'pupils develop a good understanding of how to live a healthy life'**. Towards the end of each report there is a 'table of judgements' where inspectors award a grade on a scale of one to four for the **'extent to which learners adopt a healthy lifestyle'** in the 'personal development and well-being' section. Finally, there is a table about the five outcomes for Every Child Matters that requires inspectors to provide a 'yes' or 'no' statement. In this section of the report, there are entries on:
- **'learners are encouraged and enabled to eat and drink healthily';**
 - **'learners are encouraged and enabled to take regular exercise'; and**
 - **'learners are discouraged from smoking and substance abuse'.**
- 20 In March 2006, Ofsted carried out a small-scale survey of healthy eating in ten schools³. The survey was in preparation for a major survey to be carried out in 2006-2007. HMI were accompanied by nutritionists appointed by the Food Standards Agency. The survey also used evidence from school inspection reports and other Ofsted inspection visits. The report assesses how schools are responding to guidance on school meals and healthier eating.
- 21 From September 2006, school inspection reports will have comments in response to a more specific question about the school's work in relation to healthy eating and drinking. However, it is not envisaged that this will lead to the direct inspection of the quality and standard of school meals, but instead it will result in a relatively broad comment about the school's work in promoting and enabling healthy eating and drinking.

Scotland

- 22 In Scotland, evaluations of school meals started in order to coincide with the introduction of the recommendations of the Hungry for Success initiative. Since September 2004, there has been an in-depth evaluation of food in about a 100 primary schools as part of the implementation of the Hungry for Success initiative. This represents about 5% of the total number of primary schools in Scotland.

² Every Child Matters is the programme in England for taking forward the requirements of the Children Act 2004

³ Healthy Eating in Schools. Ofsted (2006)

Similar inspections will start to take place in secondary schools from September 2006. Nutrition Associate Assessors (NAAs) who work for HMI in Scotland, carry out the evaluation and this is in addition to the standard school inspection. There are plans to increase the number of these evaluations in primary schools. Her Majesty's Inspectorate of Education (HMIE) published a report of progress in primary schools based on these evaluations in October 2005⁴. NAAs are employed by HMIE for which they receive additional funding.

- 23 The NAAs visit a primary or special school for one day and intend to visit a secondary school for one and a half days. They join the inspection team to carry out a programme of activities that includes:
- interviewing a small group of pupils;
 - interviewing catering staff;
 - observing lunchtime activities;
 - reviewing menus for school lunches against the Scottish Nutrient Standards; and
 - inspecting relevant documentation such as policies and communications with parents.
- 24 Where appropriate, the inspection report will contain references to the school's progress in implementing the recommendations of Hungry for Success. Schools also have to complete a form that provides background information to the NAAs and report on the school's progress in implementing the recommendations.

⁴ Monitoring the Implementation of Hungry for Success: A Whole School Approach to School Meals in Scotland. HMIE (2005)

Current practices in Wales

Current practice in school inspections

- 25 At present, the routine inspection of schools does not involve the direct inspection of school meals in Wales. However, school inspections seek to answer **Key Question 4: How well are learners cared for, guided and supported?** In answering this question, inspectors consider how schools 'assure the healthy development, safety and well-being of learners'. In our inspection guidance for this aspect of the key question, we state that inspectors should evaluate whether the school:
- 'has clear, well-documented procedures for assuring pupils' well-being and health and safety when in the school's care; and
 - does all it reasonably can to protect the pupils in its charge from harm, and promotes their well-being through awareness of health and safety and through its day-to-day procedures.'
- 26 In addition, inspectors evaluate how well pupils develop their personal, social and learning skills. In doing this, inspectors take into account the personal and social education (PSE) skills in the common requirements of the National Curriculum and the learning outcomes of the Personal and Social Education Framework⁵. In this latter document there are outcomes that aim to assist pupils to live healthy lives. For example, the outcomes for key stage 2 include having 'respect for their bodies and those of others and enjoy and take more responsibility for keeping their body safe and healthy'.
- 27 Where school inspections include the inspection of subjects, inspectors consider the contribution made to healthy living in subjects such as design technology, science and physical education.
- 28 In January 2005, we published guidance⁶ on the inspection of physical activity and healthy living. The guidance referred to the Welsh Network for Healthy School Schemes. It shows where inspectors might gain evidence for physical activity and healthy living, for example in the school's provision for PSE or in subjects such as physical education, science, and design technology. In order to help inspectors, the guidance contains a series of questions that they might consider in evaluating the school's work. Finally, the guidance provides some suggestions about where inspectors might report on physical activity and healthy living.
- 29 Although inspectors have sought to evaluate in broad terms how pupils develop healthy living, it has not been reported explicitly enough. As a result, few inspection reports contain any clear comments on healthy living and none mentions school meals.

⁵ Personal and Social Education Framework. ACCAC (2000)

⁶ Inspection Matters. Schools Issue No 2. Estyn (January 2005)

Current practice in the inspection of local authority education services

- 30 Over the period of the local education services inspection cycle from 2006 to 2012, all the local authority's major fields of responsibility will be inspected. Inspectors evaluate the fields on the basis of criteria that have been agreed by Estyn, the Association of Directors of Education in Wales and the Wales Audit Office. One of these fields is concerned with the support services that local authorities provide for schools and within that field there is a set of criteria for school meals. Therefore, whenever support services for schools are being inspected, inspectors will evaluate and report on the provision and administration of school meal services, including the monitoring of their quality.
- 31 The current criteria for the inspection of local authority education school meal services identify the following good features.
- 'Council statutory responsibilities, including arrangements for free school meals and the maintenance of kitchens and equipment, are performed well. Problems are rare and promptly dealt with.
 - Any central contract(s) available for schools are flexible to schools' wishes and provide good value-for-money. Pro-active client support is available to schools wishing to make their own arrangements. Problems are rare and promptly dealt with.
 - Good advice is readily available on nutrition and catering options.
 - Monitoring to ensure schools meet their statutory duties for hygiene, nutritional standards and health and safety is in place. Intervention, when required, is prompt and effective.
 - The quality of school meals is good and supports healthy living.'
- 32 We feel that these inspection requirements and criteria are appropriate and we do not propose to change them.

Future proposals

- 33 In the future, in addition to continuing with our current practice when inspecting local authorities' education services, we propose that:
- from April 2007 we will ensure that the school's work in promoting and enabling healthy eating and drinking will be an explicit element of routine school inspections; and
 - subject to the Welsh Assembly Government's request, we will conduct a survey into healthy eating and drinking during 2007-2008 with the support of specialists from the Food Standards Agency.

Routine school inspections

- 34 In answering **Key Question 4: How well schools care for, guide and support learners?** inspectors consider how schools 'assure the healthy development, safety and well-being of learners'. At present, our handbooks do not provide inspectors with enough guidance about how to report on healthy eating and drinking. Therefore, we propose that, as soon as possible, we will amend the Using the Criteria section for Key Question 4 in the guidance handbooks so that inspectors should evaluate whether the school 'is effective in encouraging and enabling learners to be healthy.' In this way we can ensure that we take a broad view of healthy living that encompasses physical activity and fitness as well as eating and drinking. This would reflect the Welsh Assembly Government's aim to develop a whole-school approach to food and nutrition.
- 35 For **Key Question 4: How well schools care for, guide and support learners?** we also propose to make it a reporting requirement that inspectors comment on how well the school encourages and enables learners to be healthy.
- 36 We do not think that it is reasonable or practicable for school inspection reports to report directly on the standard of school meals. Over the years we have made inspections shorter, simpler and more streamlined and, as a result, reduced the level of inspection in schools. The introduction of the Common Inspection Framework in September 2004 provided a significant step forward in this process. We believe that we cannot add further specific requirements, such as the requirement to inspect the standard of school meals, without making inspections longer.
- 37 The inspectors that we currently employ in schools do not have the technical expertise to make judgements about the nutritional value of school meals.

- 38 However, we consider that it is right to attach greater emphasis in the course of routine inspections to the school's approach to food and nutrition. We feel that this approach is in accordance with the Welsh Assembly Government's aims and reflects the guidance in 'Appetite for Life'. School inspections are not the right place to monitor the standards of school meals. Instead, we agree with the proposals in 'Appetite for Life' that there should be:
- a national database to assess progress towards the delivery of the standards (proposal 37); and
 - that the Welsh Assembly Government should undertake a Wales-wide evaluation of school food provision (proposal 40).
- 39 The approach that we are proposing will mirror that in England where there is a broad focus on healthy living in routine inspections.
- 40 This approach also mirrors that in Scotland for most of their standard school inspections. However, unlike Scotland, we do not propose to introduce in-depth evaluation by nutrition experts in a sample of these schools. We do not propose to do this because we do not have the resources to undertake such a programme. In Scotland, just under a fifth of one HMI post is allocated to this work, together with two full-time NAAs and one part-time (0.6 full-time equivalent) NAA, and there is an increased time allocation for the lead inspector for all the inspections concerned. The NAAs were appointed specifically to monitor the implementation of Hungry for Success. The inspection regime is different in Scotland and fewer schools are inspected each year compared with Wales. This is because in Scotland there is no programme to inspect one-sixth of schools each year as there is in Wales. Therefore, the resources required in Wales to replicate this arrangement would be significantly higher. In Scotland, HMI lead and undertake school inspections, whereas in Wales, inspections are contracted out. In these circumstances in Wales, it is likely that, even if the resources were available to gain HMI time and to employ nutrition experts, further funding would be required to organise and manage the contracted-out arrangements. Therefore, we believe that it is not practical to use this model in Wales, but that it is more sensible to use a model similar to that in England, where the inspection regime is much the same.
- 41 However, the addition of the new bullet point to our inspection guidance handbook in the 'Using the Criteria' section for **Key Question 4: How well schools care for, guide and support learners?** will increase the attention inspectors give to healthy living, eating and drinking in all school inspections. In order to do this we will provide additional guidance to school inspectors through supplementary guidance.
- 42 As stated earlier, we have already provided guidance for inspectors on inspecting physical activity and aspects of healthy living in Inspection Matters Schools Issue Number 2 (January 2005). We aim to update this guidance in the light of the 'Appetite for Life' proposals. The guidance will cover healthy living, food and physical activity. In our guidance, we will set out a series of prompts to guide inspectors in looking for evidence and this will refer to healthy food and drink in the school, and school meals. We will encourage inspectors to look closely at the school's

self-evaluation reports in order to evaluate how well the school promotes and enables healthy eating, including the quality of food and drink available in the school. Schools will be expected to present or refer to evidence to support their own evaluations in the self-evaluation report and inspectors will have an opportunity to examine this. If the proposals in 'Appetite for Life' are accepted, then inspectors will also be able to examine whole-school food policies (proposal 18) and headteachers' reports for governors on progress in meeting the objectives set out in their whole-school food policy (proposal 38). 'Appetite for Life' proposes that all schools should have food policies by the end of the summer term 2008.

- 43 Where subjects are inspected, we will continue with our current practice of considering healthy living in the inspection of subjects such as design technology, science and physical education. In addition, inspectors will take account of any changes made to the National Curriculum requirements for these subjects from September 2008.
- 44 We propose to amend the section in the guidance handbook as soon as we can. We will produce specific and additional guidance about inspecting healthy eating and drinking in routine school inspections that will be published by the end of December 2006. All inspections conducted after 1 April 2007 will report on how schools encourage and enable healthy living.
- 45 In summary, we propose that, as a part of routine school inspections, we will:
- introduce a new evaluation requirement for inspectors about healthy eating and drinking in our inspection guidance handbooks for schools;
 - require inspectors to report in each inspection report on how well the school encourages and enables healthy eating and drinking;
 - provide supplementary guidance for inspectors on how to inspect healthy eating and drinking; and
 - encourage schools to include more detail in their self-evaluations on how they promote healthy eating and drinking, including reporting on the quality of school meals using the agreed food and nutritional standards.
- 46 The new duties of inspection and reporting will increase the requirements for independent inspections and are likely to increase the price of inspections.

Survey into healthy eating and drinking

- 47 In addition to the inspection of schools, we also carry out a number of activities that are set out in a remit letter from the Welsh Assembly Government. We propose that the Welsh Assembly Government asks Estyn to carry out a baseline survey into healthy eating and drinking in the period 2007-2008. This will be in advance of the implementation of the proposals in 'Appetite for Life'. A survey will be a timely and effective way for gaining an understanding of how well schools promote and enable healthy eating and drinking. Visiting a carefully constructed sample of schools will allow us to generalise from our findings and establish a representative picture of the situation across Wales.

- 48 Our specialists in food nutrition, home economics and catering will carry out the survey. We will seek the support of nutritionists identified by the Food Standards Agency (FSA). We have already held initial discussions with the FSA and we will consult further over the design of the survey, including the inspection prompts and instruments that we will use. We will also consult the FSA on the role that they, or nutritionists approved by them, can play in accompanying inspectors on school visits. However, the scale of this role will depend on the resources that the FSA has available for such work. The prompts and instruments that inspectors use will be made available to the public through our website. We propose that the report will be published in hard copy and on our website in the summer of 2008. This will provide Estyn and the FSA with the opportunity to test the new food and nutritional standards. In turn, schools could use the standards as a basis for monitoring and for constructing their self-evaluation reports.