

Contact Details**Sharon Porter**

Senior Consultant

07884 231 701

Sharon.Porter@tribalgroup.com**Contact Address****87-91 Newman Street, London, W1T 3EY****T: +44 (0) 207 323 7100, F: +44 (0) 207 323 7210**

This report is for the benefit of Department of Health only and has been released to Department of Health on the basis that it shall not be copied, referred to or disclosed, in whole or in part, without our prior written consent. We have not verified the reliability or accuracy of any information obtained from third parties in the course of our work. Any party that obtains access to this Report or a copy (under Freedom of Information Act 2000 or otherwise) and chooses to rely on this Report (or any part of it) does so at their own risk. To the fullest extent permitted by law, Tribal do not assume any responsibility and will not accept any responsibility in respect of this Report to any party other than the original addressee. Clients should note that Tribal are not tax advisers, financial advisers or lawyers and do not assume any responsibility or accept any liability for any tax, financial or legal advice that may be given by or on behalf of Tribal. If such advice is required, advice from a relevant professional adviser should be sought.

Tribal Consulting Limited. Registered office: 87-91 Newman Street, London W1T 3EY. Company registered in England and Wales No. 4268468.

Contents

- Foreword from Department of Health 1
- Executive Summary..... 2
- 1. Introduction 5
- 2. Analysis of meeting criteria 6
- 3. Accuracy of self-assessment and implementation issues 14
- 4. Broader perspectives relating to HFM 20
- Appendices 22
 - Appendix A. HFM Criteria 22
 - Appendix B. Pilot organisations/outlets 25
 - Appendix C. Summary of questionnaire content..... 26
 - Appendix D. Criterion level detailed analysis - nutrition..... 27
 - Appendix E. Criterion level detailed analysis - sustainability 34

Foreword from Department of Health

Over the last two years, the Department of Health has been developing a scheme to improve the nutritional content and sustainability of food served in the public sector, provisionally known as the Healthier Food Mark. The Department of Health has been working across Government on this, and particularly closely with both the Food Standards Agency (FSA) and the Department for the Environment, Food and Rural Affairs (Defra). Two pilots, involving over 70 organisations from across the public sector, have been completed.

Following a written ministerial statement on Monday 26 July by Parliamentary Under-Secretary for Health, Anne Milton, the Healthier Food Mark will not be taken forward as a discrete scheme. Instead, the considerable body of evidence and learning from the development of both the nutrition and sustainability criteria will be used to help develop Government Buying Standards for food procurement in the public sector.

Government Buying Standards ensure that the public sector procures sustainable goods and services. They are mandatory for central government departments and their executive agencies and are promoted to the wider public sector. The Government Buying Standards for food will take account of the evidence gained from the pilots of the Healthier Food Mark. Defra, working with the Department of Health and other Government Departments, will assess the costs and benefits of a number of options for criteria to be included in the Government Buying Standards for food to address both nutrition and sustainability. The standards will be consulted on in the autumn.

Gateway reference number : 14734

27 July 2010

Executive Summary

The Department of Health (DH) has been leading the development of a three-tier Healthier Food Mark (HFM) scheme for the past two years, which aims to improve the sustainability and nutritional value of food served in public sector organisations such as hospitals, schools, local authorities and government departments. The development programme has included the detailed definition of the criteria that must be passed to achieve either a bronze, silver or gold rating. The development programme has also designed detailed guidance documentation for food providers and designed a self-assessment process.

22 public sector organisations have piloted the HFM, in order to test the self-assessment process and to better understand the costs, perceived benefits and feasibility of implementing the Mark. These organisations include a wide range of public sector organisations. They operate in different ways; some have in-house food providers while others have an external provider. The 22 organisations operate a total of 64 food outlets, including restaurants, shops and vending machines. Each of the pilots assessed their current performance against each HFM criterion by means of a questionnaire, with no expectation that they would have yet made changes to meet the criteria.

Tribal has analysed the results of the self-assessments in order to understand how many sites reported having evidence to meet the HFM criteria. Tribal also visited ten sites in order to evaluate the accuracy and reliability of their self-assessment. This report details the key findings – it should be noted that these findings provide greater insight into the feasibility of public sector organisations meeting nutritional and sustainability related criteria, however the sample size is such that the findings should not be considered wholly representative of the sector, or individual segments of it.

The analysis of self-assessment questionnaires found that:

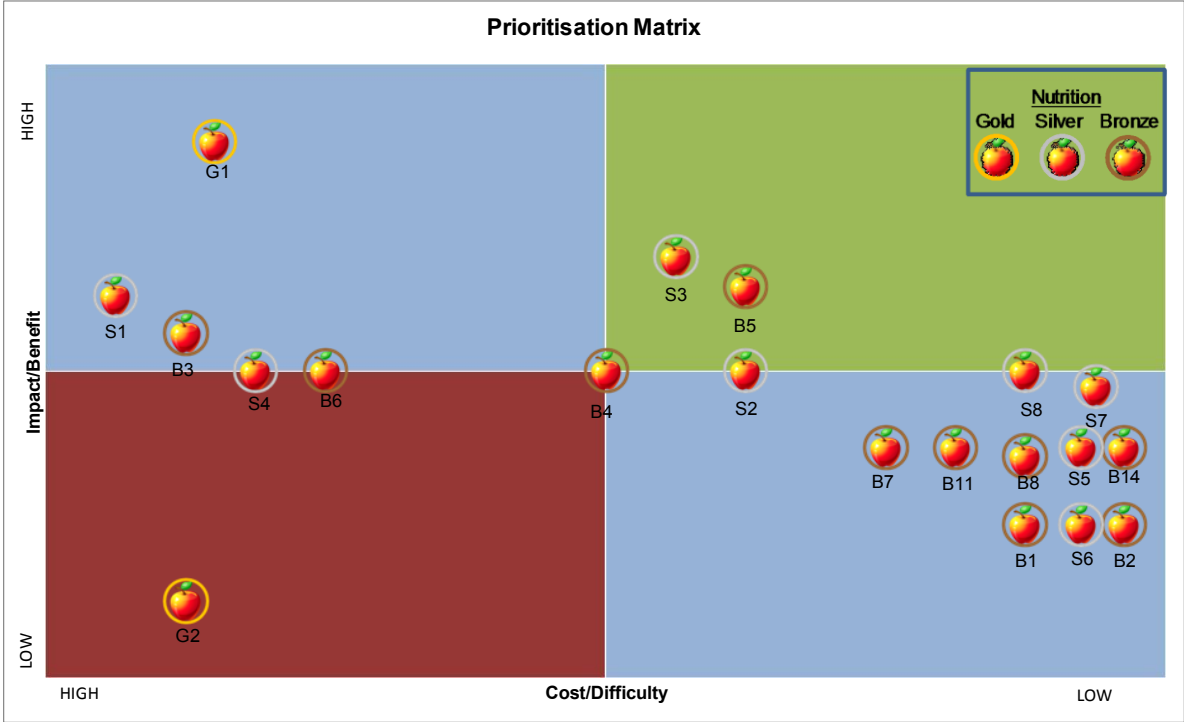
- No outlet or organisation reported having evidence of meeting all of the criteria at any of the three levels and therefore did not meet the requirements of the Healthier Food Mark.
- Where organisations reported meeting a criterion they usually reported also having the evidence to substantiate this.
- In-house providers were more likely to report having evidence of meeting the criteria than out-sourced services, with the contrast being particularly noticeable in some criteria such as recycling, tendering opportunities being available to SMEs and on salt and fat related targets.
- A significant number of criteria were not perceived applicable to vending outlets.
- Hospital outlets were less likely to recycle than government and police outlets.

The evaluation of the self-assessments of the sample of ten sites found that the accuracy of reporting was mixed, with evidence being produced for 71% of the criteria that were reported as being met. There are a number of specific criteria where accuracy was poor, often due to the perceived complexity of the evidence required or the cost/time of gathering that evidence. These are set out in the main report.

Our evaluation also considered the perceived impact and benefit, cost and level of difficulty of implementation for each criterion. Information on the impact of each criterion was sourced from work undertaken during previous phases of the HFM pilot, whilst consideration of the cost, level of difficulty and effort required has been updated using feedback from the ten pilots visited.

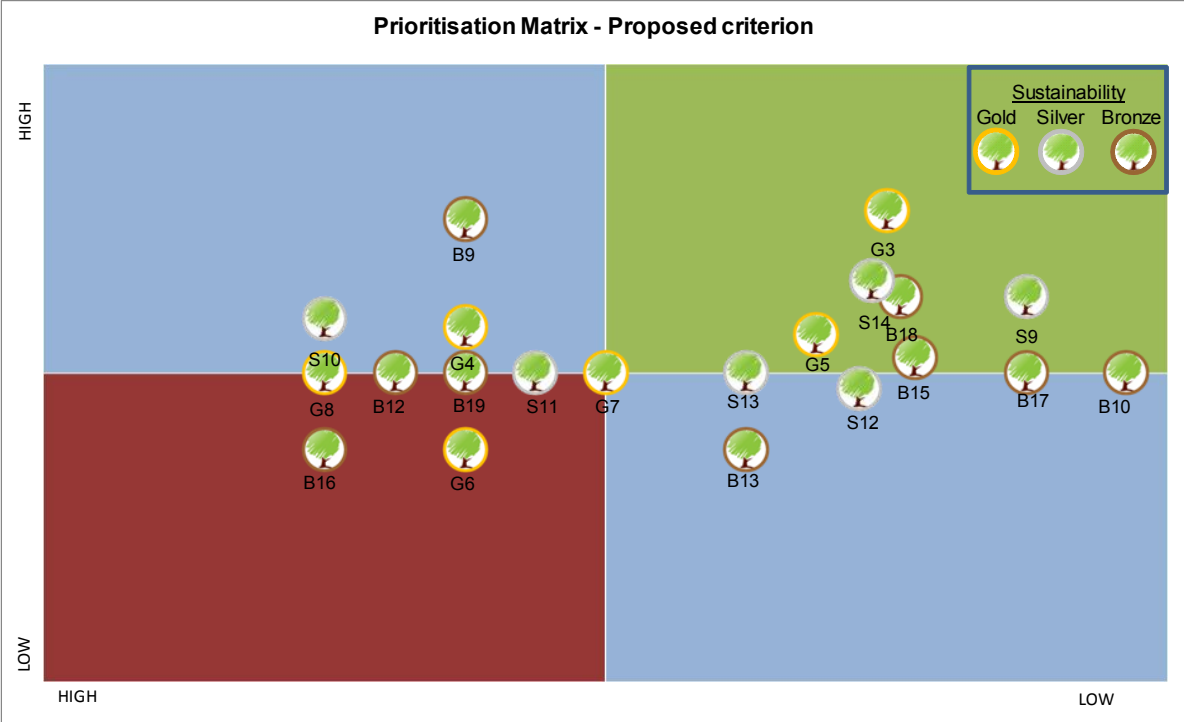
Figures 7 and 8 below show the relative perceived impact/benefit and cost/difficulty of each of the nutrition and sustainability criterion.

Figure 7 – Matrix showing criterion relating to nutrition



Many of the nutrition criteria are relatively easy to implement and are on the right half of the graph. However, G2 (calorie/allergen labelling on menus), B3 and S1 (salt content of different percentages of specified procured foods), and S4 and B6 (salt/fat/saturated fat/added sugar content of complete meals) require more effort and time to implement.

Figure 8 – Matrix showing criterion relating to sustainability



The sustainability criteria generally have a higher perceived benefit/impact than the nutrition criteria based on information gathered previously from stakeholders and industry groups. The two criteria which are high cost or difficult to implement with relatively lower benefits are B16 relating to providing in-season produce and G6 regarding installation of energy check meters.

Feedback from pilot organisations on the questionnaire included:

- The majority of pilot organisations visited reported finding the questionnaire easy to complete.
- The guidance provided was perceived to be helpful by the majority of those who referred to it.
- It took between one and three hours to complete the questionnaire, but between one and three weeks to verify information from a number of sources.

The HFM has received a positive reception and most organisations plan to make further changes to meet more of the HFM criteria, although some barriers were anticipated or encountered, including:

- Cost of implementation, for example the cost of purchasing free range eggs, animal welfare assured meat or environmentally assured produce.
- Commercial impact and fear of losing revenue, for example if consumers can visit a nearby shop to purchase savoury snacks, sweet drinks and confectionery.
- Items not readily available in catalogues contracted to supply to the catering company.
- Supplier support.
- Stakeholder communication, support and cooperation.

1. Introduction

1.1. Background

The Department of Health (DH) has been leading the development of a three-tier Healthier Food Mark (HFM) scheme for the past two years. The HFM scheme aims to improve the nutrition and sustainability of food served in the public sector.

The HFM criteria have been agreed with stakeholders and are detailed in Appendix A.

22 public sector organisations representing 26 sites and 64 outlets volunteered to be part of the pilot programme and completed questionnaires to assess their current performance against each criterion, with no expectation that changes would have yet been implemented to improve performance against the HFM criteria.

DH commissioned Tribal to evaluate the self-assessment of these pilots. Tribal analysed the responses from all 64 questionnaires to understand the level to which they met each criterion. Tribal also visited 10 sites covering 20 outlets to evaluate the accuracy of the self-assessment. This included:

- An assessment of the ease of completing the survey
- An analysis of the evidence provided to demonstrate compliance
- Identification of how to improve the self-assessment process where the evidence isn't to the required level
- Gathering evidence on the ease of meeting the criteria and the potential implementation issues
- An understanding of the longer term objectives for attaining the HFM and any barriers to attaining their objectives

This project did not intend to evaluate the HFM programme but was limited to evaluating the self-assessment of the pilot organisations.

1.2. Report structure

This report outlines the findings of the evaluation. It is divided into three further sections:

- Chapter 2 – Analysis of meeting criteria
- Chapter 3 – Accuracy of self-assessment and implementation issues
- Chapter 4 – Broader perspectives relating to the HFM

2. Analysis of meeting criteria

This chapter summarises the analysis of the responses to the self-assessment questionnaires to understand which organisations reported meeting the HFM criteria. It is split into the following six sections.

- Section 2.1 – Overview
- Section 2.2 – Analysis of all responses
- Section 2.3 – Questionnaire responses by type of organisation
- Section 2.4 – In-house versus out-sourced outlets
- Section 2.5 – Questionnaire responses by outlet type
- Section 2.6 – Summary of findings

2.1. Overview

A variety of pilot organisations completed the self-assessment questionnaires, including:

- Care Homes
- Central Government Departments and Agencies
- Hospitals
- Local Authorities
- Meals at Home
- Prison
- Police
- Schools

Each pilot organisation completed one questionnaire for each outlet at each site. A total of 64 questionnaires were completed covering 26 sites in 22 organisations. Appendix B provides details of the outlets and organisations which completed the questionnaires. The nature of the outlets ranged from vending machines to meals provided to patients in hospitals. The involvement of this number of pilot organisations has enabled greater insight into the feasibility of public sector organisations meeting nutritional and sustainability related criteria, however the sample size is such that the findings should not be considered wholly representative of their part of the sector.

Respondents were asked to indicate whether the outlet met the HFM criteria, and, if so, whether they had the evidence as indicated in the HFM guidance to prove this. It was also possible to indicate they considered the criteria not relevant to the outlet.

Some questions were not posed to vending machines, retail outlets, or meals at home services. Outlets which met the criterion G1 on nutritionally analysed menus were not required to answer some of the questions relating to criteria met by achieving G1. Appendix C summarises the questions for each outlet type.

2.2. Analysis of all responses

No outlet reported achieving all of either the bronze, silver or gold HFM criteria. Where organisations reported meeting a criterion, 97% reported also having the evidence to substantiate this.

2.2.1. Gold criteria

The maximum number of gold criteria reported as being met with evidence to support the assessment, was five out of a possible eight criteria – this was reported by the three Defra outlets. Most outlets reported meeting between one and three gold criteria. However, four outlets reported meeting none of the gold criteria.

Figure 1 – a summary of total responses to the gold criteria questions

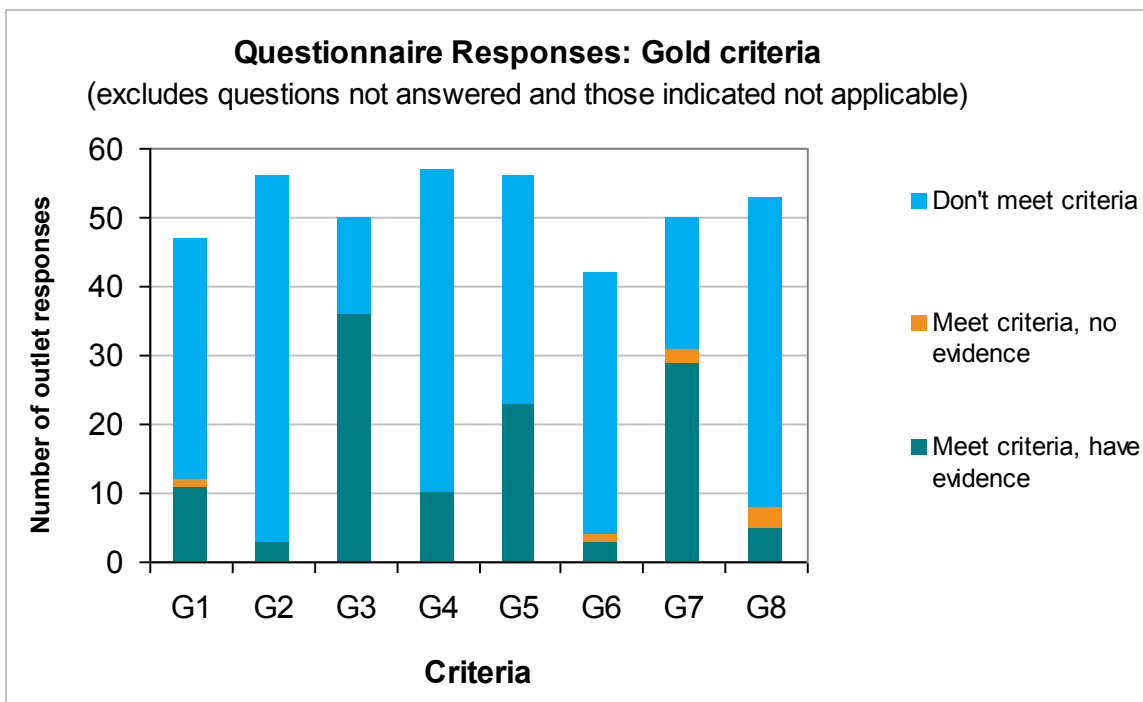


Figure 1 above shows that the gold criterion most frequently reported as met with evidence was G3 (100% of all seafood products to be procured from sustainable sources). This was reported as met by 36 outlets out of an applicable 64, including a vending machine.

Also particularly noticeable are criteria which few outlets met:

- G1 – 22% of outlets reported meeting and having evidence for having nutritionally analysed menus (11 out of a possible 50, excluding vending machines and shops)
- G2 – Only three outlets reported having met and having evidence for menus to include calorie and allergen labelling
- G4 – 16% of outlets reported that 20% of food purchased was certified or assured to higher environmental standards (10 outlets)

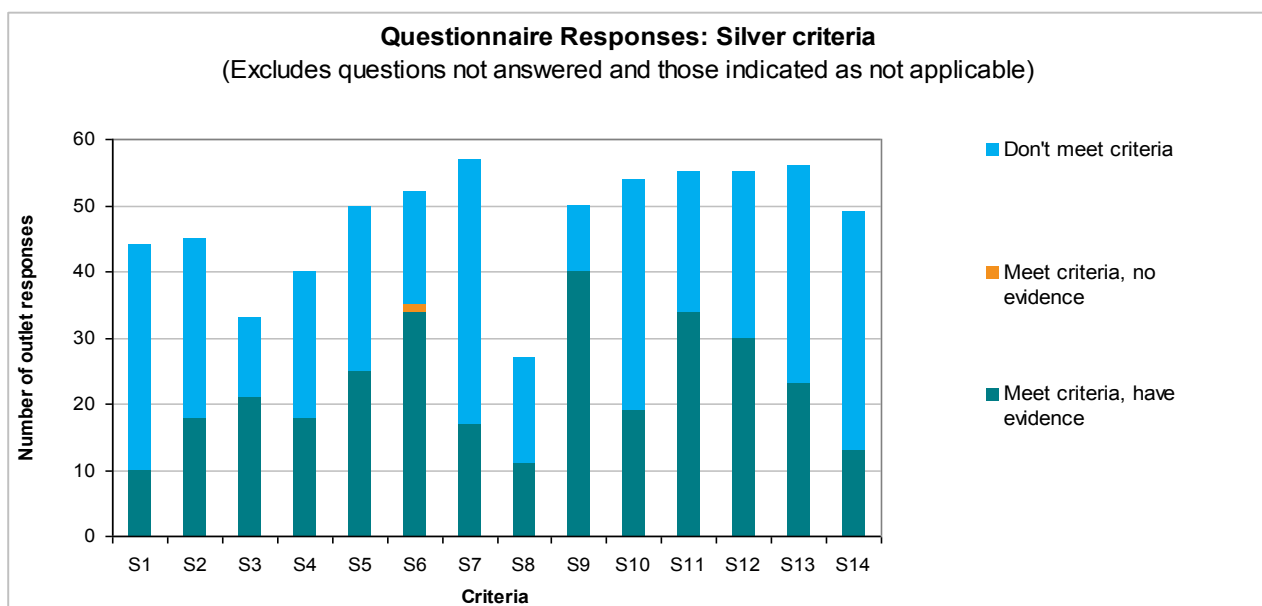
- G6 – 6% of outlets reported having energy check meters installed in kitchens, and used them to reduce energy consumption (three outlets of a possible 49, excluding vending, retail, and meals at home outlets)
- G8 – 8% of outlets reporting meeting and having evidence that food waste was separately collected and recycled through either composting or an anaerobic digestion facility (five out of a possible 63, excluding meals at home)

Analysis of feedback from the pilot sites visited is provided in detail in appendices D and E, and also section 3 explores whether these criteria would be difficult or costly to meet in the future should they be retained within the HFM.

2.2.2. Silver criteria

The outlet labelled within the pilot “South Tyneside Hospital Restaurant A” reported meeting the most number of silver criteria with evidence – 13 out of a possible 14. Most outlets reported meeting between three and eight silver criteria. Five of the vending machines and shops reported meeting only one silver criterion, out of a possible 12 criteria for vending and 14 criteria for shops. Figure 2 below summarises the silver criteria questionnaire responses.

Figure 2 – a summary of total responses to the silver criteria questions



Reviewing responses to silver criteria related questions, it can be seen that those that were more commonly met with evidence were:

- S6: 53% of outlets (34 out of a total of 64) reported having evidence of meeting the criterion on controlling the size of confectionery packets
- S9: 40 outlets reported having evidence that 50% of seafood came from sustainable sources
- S11: 34 outlets reported having evidence that 10% of food was procured to a higher environmental standard
- S12: 30 outlets reported having evidence that 50% of tea and coffee purchased was fairly traded.

Criteria least commonly met were:

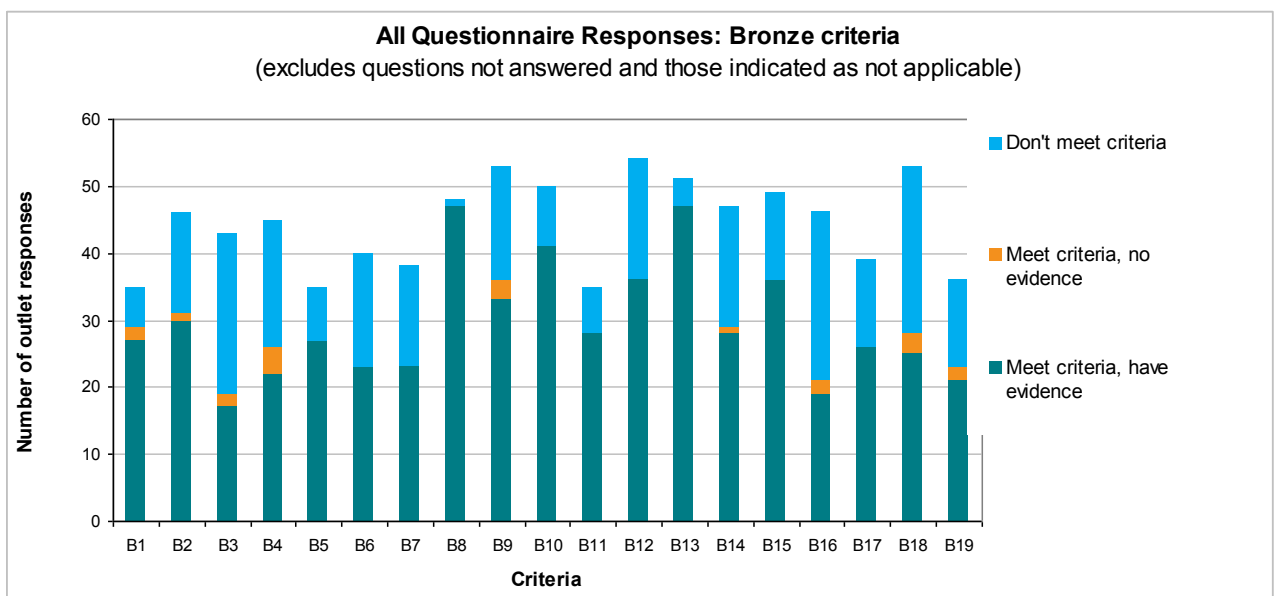
- S1 – 19% of outlets (10 outlets) reported having evidence of meeting this criterion of 75% of specified products meeting FSA salt targets (out of a possible 54, excluding those that met and had evidence for meeting G1)
- S7 – 27% of outlets (17 outlets) reported having evidence of controlling the size of sugary drinks (out of a possible 64 outlets)
- S8 – 26% of outlets (11 outlets) reported having evidence that meal deals were balanced containing a carbohydrate, fruit and vegetables (out of a possible 43, excluding vending machines and those that met G1 with nutritionally analysed menus)
- S14 – 26% of outlets (13 outlets) reported having evidence of using paper products made from 100% recycled content (out of a possible 50, excluding retail and vending outlets)

Analysis of feedback from the pilot sites visited is provided in detail in appendices D and E, and also section 3 explores whether these criteria would be difficult or costly to meet in the future should they be retained within the HFM.

2.2.3. Bronze criteria

The maximum number of bronze criteria reported as met with evidence within the questionnaire was 18 out of a possible 19, by Defra Smith Square Restaurant (and another, however this outlet when visited later had evidence for only 8 of these). Figure 3 below summarises questionnaire responses for bronze criteria questions.

Figure 3 – a summary of total responses to the bronze criteria questions



As would be anticipated, a higher proportion of the bronze criteria were reported as met with available evidence by outlets than for silver or gold. However, there was still variation in the number of outlets which met each criterion. The criteria which more outlets met include:

- B8 – 73% of outlets reported having evidence of a portion of fruit being cheaper than any other dessert (47 out of a possible 64 outlets)
- B9 – 61% of outlets reported having a sustainability policy in place with evidence (33 outlets out of a possible 54, excluding vending machines)

- B10 – 64% of outlets reported having evidence of purchasing 25% of seafood which was sustainably sourced (41 out of a possible 64 outlets)
- B12 – 56% of outlets reported having evidence of purchasing 75% of meat which met verified animal welfare standards (36 out of a possible 64 outlets)
- B13 – 87% of outlets reported having evidence of using only eggs from free range/enriched caged chickens (47 out of a possible 54 outlets, excluding vending)
- B15 – 72% of outlets reported having evidence of purchasing new equipment meeting the top two categories of the EU energy label (36 out of a possible 50 outlets, excluding vending, retail and meals at home)

Bronze criteria which significantly fewer outlets met included:

- B3 – 32% of outlets reported having evidence of meeting the target of 25% of specified products meeting FSA salt targets (17 out of a possible 53, excluding those that met G1)
- B16 – 39% of outlets reported having evidence of using fresh produce purchased in-season and highlighted on menus with evidence to support this (19 outlets out of a possible 49, excluding vending, retail and meals at home)
- B19 – 42% of outlets reported having evidence of providing separate contracts for supply and distribution, advertised to SMEs (21 outlets out of a possible 50, excluding vending and retail)

Analysis of feedback from the pilot sites visited is provided in detail in appendices D and E, and also section 3 explores whether these criteria would be difficult or costly to meet in the future should they be retained within the HFM.

2.3. Questionnaire responses by type of organisation

The questionnaires were completed by a variety of organisations, which have been grouped for analysis as shown in Table 1 below. The most marked difference in reporting rates between organisational types is at silver, where 49% of applicable criteria were met by hospital outlets, whilst government offices/police outlets met 22% of applicable silver criteria. The gold and bronze level responses were less variable by organisational type, varying 11 and 8 percentage points respectively.

More detailed analysis of the differences in response rates for different criteria reported by organisational type is provided below.

Table 1 – Questionnaires by organisation type

Organisation type	Questionnaires
Local and central government offices and police	32
Hospitals	21
Education	6
Other (health/care/prison)	5
Total	64

Reviewing questionnaire responses from the 21 hospital outlets, it appears that more hospital outlets control savoury snack and confectionery sizes than the main sample of outlets (criteria S5 and S6, both met by 13 hospital outlets of a possible 21). In general hospitals were less advanced than other types of organisations at providing facilities for staff and customers to recycle cans, bottles, cardboard

and plastics (Criterion B18 was met by five hospital 5 outlets out of a possible 18, compared for example with 14 out of a possible 26 outlets within local and central government organisations).

The sample of six college and school outlets were more likely to have nutritionally analysed menus (G1 – three out of six outlets), use 100% fair trade tea and coffee (G5 – three out of six outlets); and not have salt on tables (B2 – five outlets of five applicable outlets) than the complete sample. However the six outlets fared less well against sustainably source seafood (G3), controlling portion sizes of savoury snacks (S5); healthier breakfast cereals (B5), and balanced complete meals (B6).

A higher proportion of government offices and police outlets reported having evidence of purchasing of organic food than the majority of outlets (S11 – 23 of 32 outlets compared to for example seven of 21 hospital outlets), whilst being less likely to purchase farm assured meat (S10 – two out of a possible 32 outlets), have oily fish on the menu (B11 – nine of a possible 24 excluding vending and retail, as compared to, for example, 12 hospital outlets from a possible 16) or provide and advertise having tap water (B14 – nine outlets from a possible 24 compared for example to 11 hospital outlets from a possible 16).

2.4. In-house versus out-sourced outlets

Analysis has been undertaken to review questionnaire responses that were known to be either provided in-house or outsourced. There were noticeable differences between how likely some criteria were to be met; Table 2 below highlights some of these differences. On the whole, in-house outlets were likely to meet more of the criteria than out-sourced outlets and the table below highlights some of these contrasts.

Table 2 – Comparison of questionnaire responses for in-house versus outsourced for selected criteria

Criterion	In-house	Outsourced
Healthier breakfast cereals (S3 & B5)	87% reported meeting with evidence B5, and 81% reported meeting S3 (14 out of a possible 16, and 13 out of a possible 16 respectively excluding those that met G1).	26% of outlets met B5 with evidence, and 7% met S3 (six out of a possible 23, and two out of a possible 23 respectively, excluding those that met G1, although 12 outlets indicated this criterion was not applicable)
Specified products meeting FSA salt targets at bronze level (S1 and B3)	62% of outlets reported having evidence of meeting bronze, and 38% reported meeting silver level with evidence (10 from a possible 16, and six from a possible 16 respectively, excluding seven that met G3)	0% of outlets met bronze or silver levels with evidence (from a possible 23, excludes three that met G3)
Fat content of cheese, type of milk and oils used (S2 & B4)	75% of outlets reported meeting B4 with evidence, 56% reported meeting S2 with evidence (12 from a possible 16, nine from a possible 16 respectively excluding those that met G3)	8% of outlets met the bronze level with evidence, and 13% silver with evidence (two from a possible 23, and three from a possible 23 excluding those that met G3)
Recycling and re-using packaging such as pallets (S13)	56% of outlets (13 from a possible 23 outlets) reporting meeting this criteria with evidence.	3% of outlet reported meeting this with evidence (one from a possible 26)
Frequency of oily fish	78% of outlets reported meeting this	25% of outlets reported meeting this

Criterion	In-house	Outsourced
on the menu (B11)	with evidence (15 from a possible 19)	with evidence (five from a possible 20)
Using seasonal fresh produce (B16)	63% of outlets reported meeting this with evidence (12 from a possible 19)	5% of outlets reported meeting this with evidence (one from a possible 20 outlets)
Recycling facilities available (B18)	75% of outlets reported meeting this with evidence (15 from a possible 20 outlets)	25% of outlets reported meeting this with evidence (five out of a possible 20 outlets)
Providing opportunities for SMEs to tender for contracts (B19)	78% of outlets reported meeting this with evidenced (15 from a possible 19)	0% of outlets reported meeting this with evidence (none from a possible 20 outlets)

2.5. Questionnaire responses by outlet type

The questionnaires were completed by a variety of outlet types as shown in Table 3 below. The proportion of criteria met for different outlet types varies; cafes/restaurants met more relevant criteria with evidence than the other two larger groups of outlet types. The vending outlets and shops reported meeting less of the applicable criteria with evidence, for example at bronze level 15% of vending outlets and 15% of shops reported meeting applicable criteria with evidence. Other outlet types fell between these two levels. Further analysis of questionnaire responses by outlet type is provided below, including highlights of particular criteria where there were differences.

Table 3 – Total questionnaires by outlet type

Outlet type	Questionnaires
Cafe/restaurant	32
Vending	10
Hospitality	8
Shop and trolley	4
Patient food	4
Schools	4
Care homes	1
Meals at home	1
Total	64

Reviewing the questionnaire responses by outlet type reduces the sample sizes for identifying trends; however there were a number of clear trends.

Three of the four schools reported having evidence of nutritionally analysed menus. All four schools reported meeting the sustainable seafood criteria (S9, B10), not having salt on tables (B2), and providing tap water (B14). Three schools reported having evidence of meeting the animal welfare standards set by criterion S10.

Other notable trends included eight of the 26 applicable cafés and restaurants (excluding those that didn't achieve G1) identifying meeting the meal deal criterion S8, and 12 cafés and restaurants

reported having evidence for offering contracts to small and medium sized enterprises (B19) as not applicable to their outlet.

Questions relating to 16 criteria were not included within the questionnaires for vending machines. Details of these can be seen in Appendix C. Questionnaires were completed for 10 vending outlets. Despite some questions being omitted, a large number of other questions were identified by the majority of respondents as not being applicable, for example relating to purchasing sustainably sourced seafood – although one vending outlet did report meeting this.

The largest number of responses on meeting criteria (regardless of the nature of the response) from vending outlets were for:

- S6, controlling the size of confectionery and packet sweet snacks – which nine outlets reported meeting,
- S5 controlling savoury snack sizes, which six outlets reported meeting
- S7 controlling the size of sugary drinks, which four organisations reported meeting.

2.6. Summary of findings

The following conclusions can be drawn from the sample of outlets for which questionnaires were completed:

- No outlet or organisation reporting having evidence of meeting all of the criteria at any of the three levels of the HFM.
- Where organisations reported meeting a criterion they usually reported also having the evidence to substantiate this.
- In-house providers were more likely to meet the criteria with evidence than out-sourced services, with the contrast being particularly noticeable in some criteria such as recycling, tendering opportunities being available to SMEs and on salt and fat related targets.
- A significant number of criteria were not perceived applicable to vending outlets.
- The 21 hospital outlets were less likely to have evidence of recycling than the 32 local and central government, and police outlets.
- The sample of four schools fared well on particular criteria – this is likely to be due to government standards for school food and Healthy Schools initiatives.

3. Accuracy of self-assessment and implementation issues

This chapter summarises the findings from the evaluation of the self-assessment process. The evaluation was carried out at ten pilot sites. This chapter examines the accuracy of the self-assessments carried out by the ten pilots and identifies any barriers preventing organisations from implementing each criterion. This chapter is split into the following four sections.

- Section 3.1 – Overview
- Section 3.2 – Nutrition related criteria
- Section 3.3 – Sustainability related criteria
- Section 3.4 – Summary of findings

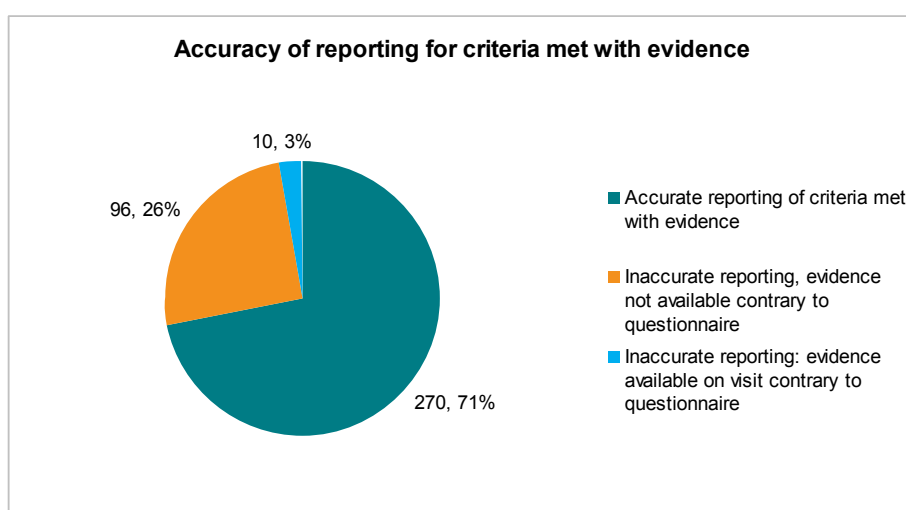
3.1. Overview

A sample of ten pilot sites was selected for the evaluation of the self-assessment process. These sites were chosen as a representative sample covering different types of organisation and outlet.

Tribal visited each of the ten sites in order to review the evidence assembled by the site to support its self-assessment. Tribal also assessed the accuracy of their self-assessment. A total of 20 outlets exist within the ten organisations' sites visited. The sites visited included at least one school, hospital, central government, local authority and health service outlets, a prison and police service headquarters.

Each site was asked to produce evidence for the criteria they had indicated they had met. The availability of evidence was mixed, with evidence being produced for 71% of the criteria that were reported as being met, as shown in Figure 4 below.

Figure 4 – Accuracy of self-assessment



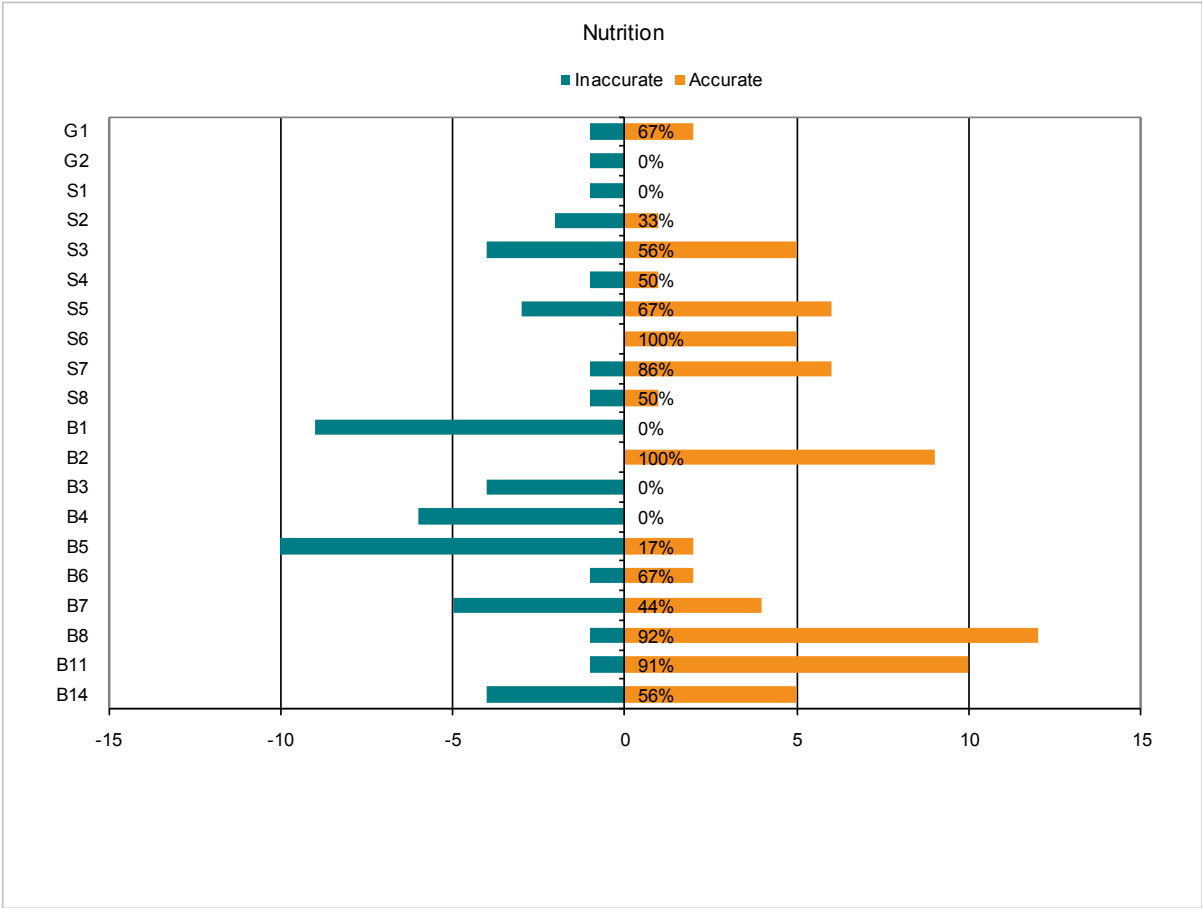
The accuracy of the self-assessment process, and issues arising, are explored in the sections below in more detail.

3.2. Nutrition related criteria

This section summarises the accuracy of the self-assessment of the nutrition related criteria by the 20 outlets in the ten pilot sites and summarises the implementation issues the sites encountered. Appendix D details the accuracy and implementation issues for each criterion relating to nutrition.

Figure 5 below shows, for each criterion which the outlet claims to have met, the accuracy of the self-assessment. The bars to the left of the graph show the number of outlets which claim to have met the criterion but were not able to show sufficient evidence and the bars to the right of the graph show the number of outlets which were able to provide the required evidence.

Figure 5 – Accuracy of self-assessment for nutrition criteria



The evidence requirements for meeting some of the nutrition criteria were perceived as particularly complex.

Criteria which were measured by a percentage of a product procured meeting a specific content or quality required were perceived as requiring more effort to meet given availability of evidence and were less commonly reported or evidenced as met. This was applicable to criteria relating to salt content (B3, S1) and fat content of foods (B4, S2). For example, to understand whether “25% of procured meat and meat products, breads, breakfast cereals, soups and cooking sauces meet FSA

salt targets and all stock preparations are lower salt varieties” (B3) requires a record of items bought to be reviewed against their product specifications to analyse the salt content of specified products, and a calculation to check what proportion of the purchases meet the salt target. No outlet was able to provide sufficient evidence to meet the criteria.

Other criteria for which evidence was less likely to be available on the day included for:

- B1. Cooking vegetables without salt – nine outlets visited reported doing this, however only two could provide written evidence of this to demonstrate meeting the criterion.
- B5. Breakfast cereals – 12 outlets had reported meeting this with evidence, however only two were able to provide evidence for this.

Criteria which prompted healthier eating choices or behaviour were more accurately reported by outlets, these included:

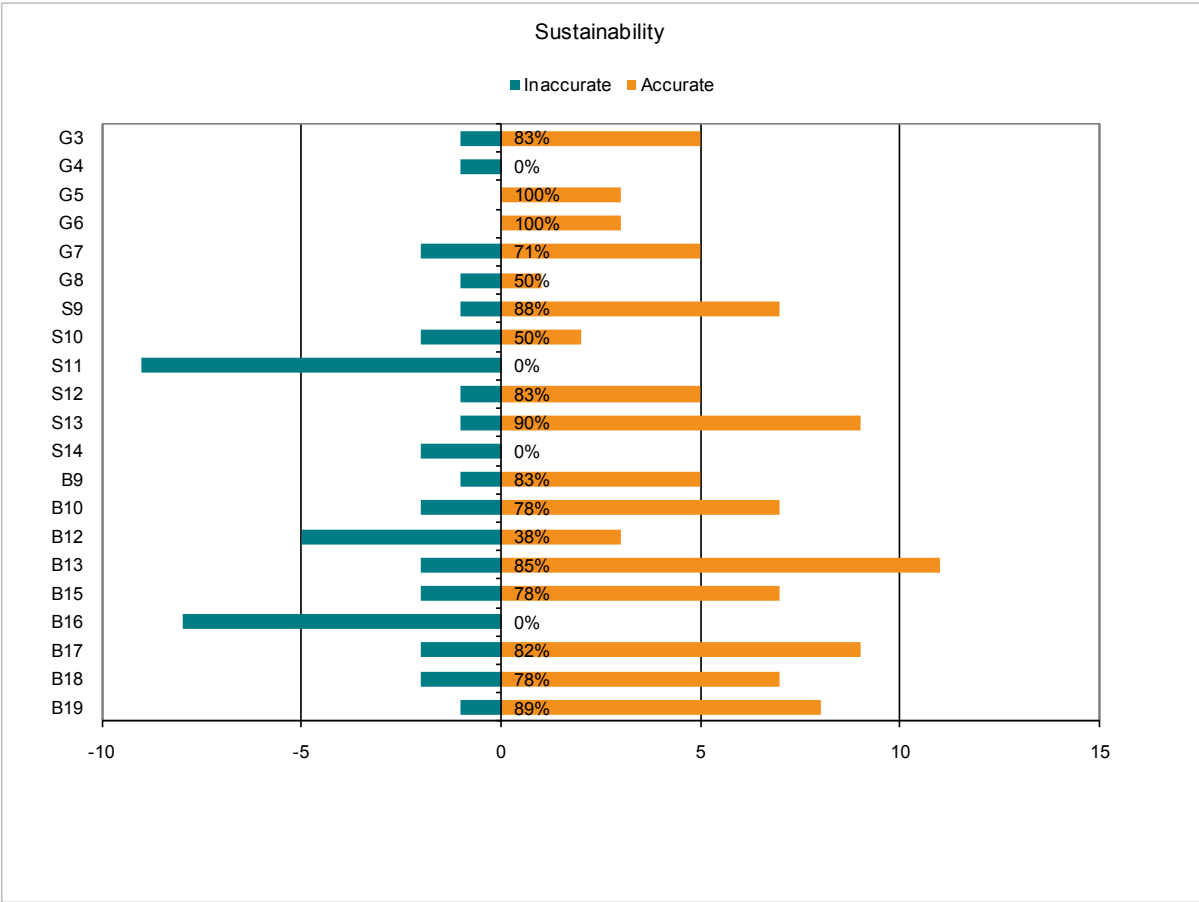
- Removing salt from dining tables (B2)
- Planning oily fish on menus (B11)
- Pricing of fruit to encourage choosing fruit over other desserts (B8)

3.3. Sustainability related criteria

This section summarises the accuracy of the self-assessment of the sustainability related criteria by the 20 outlets in the ten pilot sites and describes the implementation issues encountered. Appendix E details the accuracy and implementation issues for each criterion relating to sustainability.

Figure 6 below shows, for each criterion which the outlet claims to have met, the accuracy of the self-assessment. The bars to the left of the graph show the number of outlets which claim to have met the criterion but were not able to show sufficient evidence and the bars to the right of the graph show the number of outlets which were able to provide the required evidence.

Figure 6 – Accuracy of self-assessment for sustainability criteria



In general, nutrition was perceived to be understood much better to by the contacts interviewed than sustainability. The pilot participants often sought further clarification from colleagues on sustainability related criteria. This may be the reason why the accuracy of reporting and the average number of responses was better for sustainability related criteria than for the nutrition related criteria.

The least accurately reported criteria were:

- S11, Certification to higher environmental standards was misunderstood by a number of outlets and others had suppliers change from the time of questionnaire completion to the date of Tribal’s visit.
- B12, 75% of meat and meat products to be farm assured was difficult to evidence for many of the participants. Red tractor certification provided useful evidence for those who did meet it.
- B16, In-season produce was perceived as too complex to evidence. Where produce is grown drives the seasonality. Produce bought changes due to the British seasonality and changes to the menu. Keeping appropriate records of where the produce came from was beyond the capability of the pilot participants at this time.

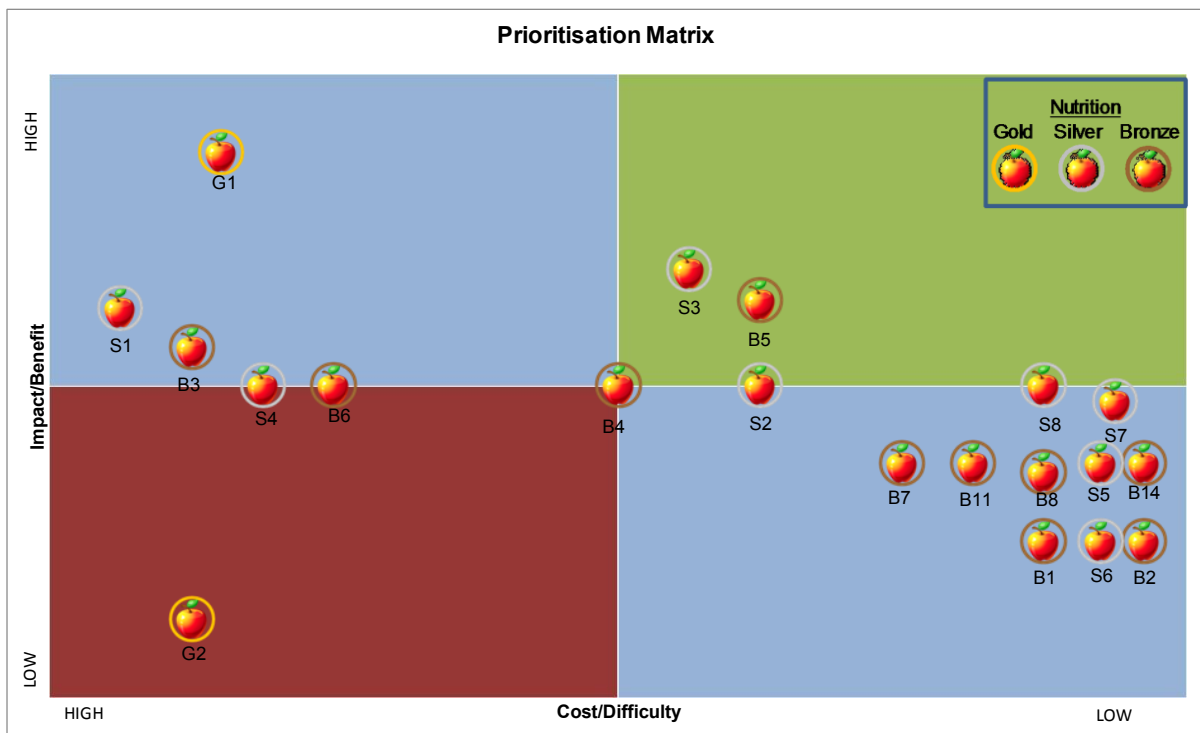
3.4. Summary of findings

An assessment of the perceived impact, benefit, cost and level of difficulty of implementing each criterion was undertaken to inform criteria prioritisation during phase 1 of the HFM pilot work. This analysis has been revisited, with perceived impact and benefit information being retained from earlier work, whilst the cost and level of difficulty have been updated using feedback from the pilots visited. This information has been plotted onto a matrix which compares the relative perceived impact and benefit, cost and difficulty to implement.

- Perceived Impact – is a measure of the benefit to society as a whole. This reflects things like sustainable fisheries, which may have little perceived benefit to the participating group but is the right thing to do for the greater good.
- Perceived Benefit – this is the benefit to the participating organisation. This reflects things like customer satisfaction, increase in company prestige and employee health.
- Cost – covers financial implications such as increase in supplier costs and increase in cost per meal.
- Difficulty – any potential non-financial barriers to meeting that criterion. This could include supplier/industry resistance (e.g. fixed procurement contracts) or staff resistance.

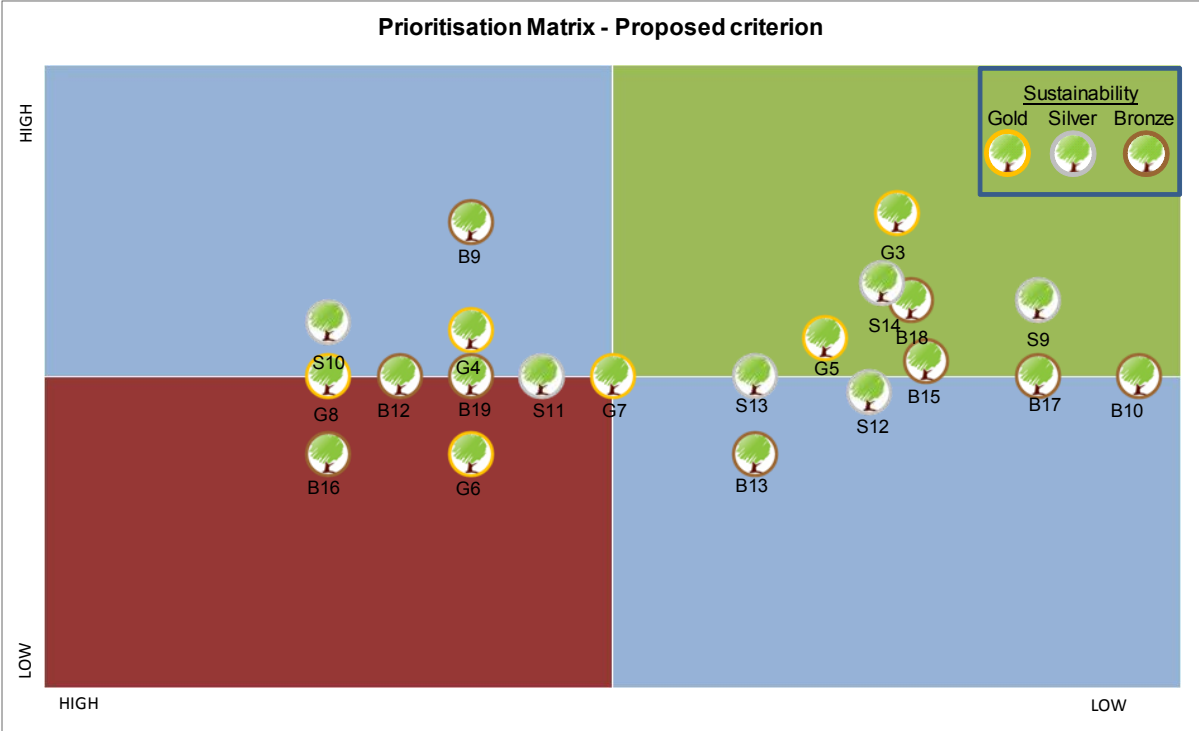
This helps to identify the criteria which are perceived to be beneficial and relatively easy to implement and should be considered for retention. It will also help to identify those which are more costly or perceived to be complex to implement which could potentially be removed.

Figure 7 – Matrix showing criterion relating to nutrition



Many of the nutrition criteria were perceived as being relatively easy to implement and are on the right half of the graph. However, G2 (calorie/allergen labelling), B3 and S1 (salt content of procured foods), and S4 and B6 (salt/fat/saturated fat/added sugar of complete meals) are comparatively harder to implement requiring more time and effort. Further information is contained in Appendix D on the specific issues faced by the pilot sites in implementing the criteria.

Figure 8 – Matrix showing criterion relating to sustainability



The sustainability criteria generally have a higher perceived benefit/impact than the nutrition criteria based on information gathered previously from stakeholders and industry groups. The two criteria which are perceived to be high cost or difficult to implement with relatively lower benefits are B16 relating to in-season produce and G6 regarding energy metering. Further information is contained in Appendix E on the specific issues faced by the pilot sites in implementing the criteria.

4. Broader perspectives relating to HFM

In addition to assessing the evidence available for criteria reported as met, the visits were used to gather more qualitative intelligence on how organisations had fared in seeking to achieve the HFM, their experiences of the self-assessment process, and their plans for the future.

4.1. Experiences of self-assessment

The majority of pilot organisations visited reported finding the questionnaire easy to complete. There were a few comments on the functions of the on-line questionnaire where individuals had identified areas that could be improved. This feedback on the questionnaire included:

- Repetitive layout was reported as making progress through the questionnaire less clear, and completion of the questionnaire a monotonous task
- Lack of clarity as to why some questions appeared void and couldn't be answered (this may have been because this outlet met G1 – nutritionally analysed menus)
- Some outlets would have liked to have an “almost” or “partial” option to whether they met criteria or not
- How to save and also how to submit caused confusion for some
- There could have been fewer questions for vending machines as many were felt to be not applicable.

The guidance provided was perceived to be helpful by the majority – although some organisations admitted to not referring to it in completing the questionnaire – familiar with the criteria from earlier involvement in the HFM pilot.

The time required to complete the questionnaire varied. For those completing the questionnaire for just a few outlets, the actual time spent completing the questionnaire was between one and three hours. Where information needed to be verified from a number of sources, the process took up to three weeks for all the information to be obtained and the questionnaire completed. For example one outlet needed to contact their central procurement team and headquarters to confirm information on animal welfare and the environmental standards of food procured. Similarly, the public health and nutritionist leads at Royal Bolton Hospital sought information from the hospital estates and catering managers, amongst others.

Other feedback relating to the guidance included one outlet identifying a need for more information on the procurement of equipment to meet the guidelines, another suggesting different guidance for schools; and also feedback that a telephone helpline or face-to-face support would be useful. Several of the pilot organisations had telephoned for advice whilst completing the HFM questionnaire.

4.2. Experiences and perceptions of meeting HFM criteria

Most organisations visited indicated they planned to make further changes in the future to meet more of the HFM criteria. In indicating this, some qualified their response to indicate that there might be some criteria they were unlikely to achieve, either because of barriers, or as it was not a priority for them. Barriers to achieving the HFM criteria are explored in more detail in section 4.2 below.

On the whole the HFM had received a positive reception by those met during the visit, and some commented that being involved in the HFM pilots had been a useful process. For example the leads at the Royal Bolton Hospital reported that the HFM provided a structure and an additional external stimulus and incentive to encourage others to make changes towards healthier food. The Bristol Care

Home's manager reported that having such a Mark would provide a standard which they could encourage all of the Care Homes to meet.

Common barriers either anticipated or encountered to-date in meeting the HFM included:

- Items not readily available – The need to purchase items to meet the HFM criterion which were not readily available from the approved buying channels. For example products not available in catalogues contracted to supply to the catering company, or a lack of information in ordering items, for example in the case of purchasing through a central procurement hub. One outlet gave the example of receiving low salt stock, but then being sent a different type without any explanation or notification through their central procurement arrangements.
- Cost – some of the criteria are likely to have a cost attached to implementing them: such as purchasing free range eggs, animal welfare assured meat, or environmentally assured produce. This would require sites to raise prices – not always possible if the contract specified that meals would be provided within a certain price category, or was not possible within the constraints of the budget – for example the prison had a set price per head to spend on food.
- Commercial impact – some outlets reported the fear of losing revenue if some of the changes were implemented and choice was taken away from the consumer. For example one outlet had not changed their savoury snack, sweet drinks and confectionery – aware that consumers could just as easily visit a nearby shop. This was much less of an issue for those sites that did not face competition (e.g. prisons or sites with no shops nearby).
- Supplier support – It was felt that the backing of suppliers is needed to increase the range and availability of products which met the criteria.
- Stakeholder communication, support and cooperation – Individual outlets had different experiences of engaging with colleagues and other stakeholders to gather the information to complete the HFM questionnaire. It is clear that all relevant stakeholders within procurement, catering, consumer representatives, and estates/facilities need to be involved in working to achieve this to ensure all of the information necessary is made available, and that people support, enable, implement and maintain the changes necessary. One outlet had decided to take the sugary drinks criterion further, and remove all sugary drinks such as regular coke from their shelves and had received complaints from staff which might have been avoided with consumer involvement in making the changes, or in ensuring a communications campaign explained the reasons for changes. Another example highlighting the need for effective co-ordination and communication is that of a pilot organisation which had attempted to limit sugary drinks in one of its outlets, and had achieved this. However another member of staff not aware of the initiative had subsequently ordered drinks which did not meet the criteria – briefing and involvement of all staff who have an impact on whether a criterion is met is necessary to ensure that a lasting change is implemented.

Appendices

Appendix A. HFM Criteria

Gold	
G1	Menu cycles are analysed to meet stated nutrient based standards relevant to the major population subgroup of catering provision.
G2	Menus (for food and beverages) include calorie and allergen labelling.
G3	100% of all seafood products procured are from sustainable sources.
G4	At least 20% by value of food procured is produced to certified or assured higher level environmental standards (organic, LEAF or equivalent).
G5	All tea and coffee is certified to be fairly traded.
G6	Energy use is monitored with check meters installed in all kitchens and this information is used to devise and implement an energy saving strategy.
G7	Any replacement or new equipment is bought from the top of the market for energy efficiency, as specified in either the Carbon Trust Enhanced Capital Allowance (ECA) scheme or in Government Procurement guidelines for the best practice level.
G8	All food waste produced by the business is collected separately and recycled at an in-vessel composting or anaerobic digestion facility.

Silver	
S1	At least 75% of procured meat and meat products, breads, breakfast cereals, soups and cooking sauces meet FSA salt targets. (*)
S2	At least 50% of hard yellow cheese has a maximum total fat content of 25g/100g; at least 75% of milk is reduced fat; and at least 75% of oils and spreads are based on unsaturated fats. (*)
S3	At least 50% of breakfast cereals are higher fibre and lower sugars varieties. (*)
S4	At least 75% of complete meals (i.e. ready prepared meals) and pre-packed sandwiches are not classified as 'high' (as defined by FSA front of pack nutrient labelling criteria) for more than one of either salt, total fat, saturated fat or added sugars. (*)
S5	Savoury snacks are only available in packet sizes of 35g or less.
S6	Confectionery and packet sweet snacks are in the smallest standard single serve portion size available within the market.
S7	All sugar containing drinks are available in no more than a 330ml portion size.
S8	Meal deals include a starchy carbohydrate and at least 1 portion of vegetables and 1 portion of fruit. (*)
S9	At least 50% of all seafood products procured are from sustainable sources.
S10	100% of meat and meat products are farm assured or equivalent as a welfare minimum.
S11	At least 10% by value of food procured is produced to certified or assured higher level environmental standards (organic, LEAF or equivalent).
S12	At least 50% of tea and coffee is certified to be fairly traded.
S13	Crates and pallets are reused or recycled materials are used in all crates, pallets, cartons and cushioning packaging.
S14	Any paper products, such as napkins and kitchen paper, are made from 100% recycled content.

Bronze	
B1	Vegetables are cooked without added salt. (*)
B2	Salt is not available on tables.
B3	At least 25% of procured meat and meat products, breads, breakfast cereals, soups and cooking sauces meet FSA salt targets and all stock preparations are lower salt varieties (i.e. below 0.6g/100mls reconstituted). (*)
B4	Products procured are lower in saturated fat where available. In addition, at least 25% of hard yellow cheese has maximum total fat content of 25g/100g; at least 50% of milk is lower fat; and at least 50% of oils and spreads are based on unsaturated fats. (*)
B5	At least 25% of breakfast cereals are higher fibre and lower sugars varieties. (*)
B6	At least 50% of complete meals (i.e. ready prepared meals) and pre-packed sandwiches are not classified as 'high' (as defined by FSA front of pack nutrient labelling criteria) for more than one of either salt, total fat, saturated fat or added sugars. (*)
B7	At least 50% of the volume of desserts available are based on fruit - which can be fresh, canned, dried, frozen or cut up. (*)
B8	A portion of fruit is cheaper than a portion of hot or cold dessert.
B9	A sustainability policy is in place for food procurement and catering services and publicised to users.
B10	At least 25% of all seafood products procured are from sustainable sources.
B11	If caterers serve lunch and an evening meal, fish is provided twice a week, one of which is oily. If caterers serve only lunch or an evening meal, an oily fish is available at least once every 3 weeks.
B12	At least 75% of meat and meat products are farm assured or equivalent as a welfare minimum.
B13	100% of eggs (in shell) are sourced from systems which do not use conventional cages. If eggs are sourced from a cage system, they should be sourced from an enriched cage system.
B14	Tap water is visible and freely available and such provision is promoted.
B15	Any replacement or new equipment bought is bought from the top two categories as per the EU energy label
B16	Where fresh produce is used, menus are designed to reflect in-season produce and in-season produce is highlighted on menus.
B17	Pre-bottled water (mineral or spring) is not included on the hospitality menu.
B18	There are facilities available to staff and customers for recycling cans, bottles, cardboard and plastics.
B19	Provide opportunity for separate contracts for supply and distribution; and advertise all food-related tenders to SMEs.

Appendix B. Pilot organisations/outlets

Organisation	Outlet
Mile End Hospital	Cafe
Mile End Hospital	Restaurant
St Nicholas Hospital	Cafe
St Nicholas Hospital	Vending
Royal Bolton Hospital	Vending
Royal Bolton Hospital	Patient Food
Royal Bolton Hospital	WRVS Shop
St Nicholas Hospital	Patient Food
Mile End Hospital	Hospitality
Royal Cornwall Hospital	Coffee Corner
Royal Cornwall Hospital	Spar Bar
Royal Cornwall Hospital	Restaurant 1
Royal Cornwall Hospital	Restaurant 2
Royal Cornwall Hospital	Patient Food
Royal Cornwall Hospital	Vending
South Tyneside Hospital	Patient Food
South Tyneside Hospital	Cafe A
South Tyneside Hospital	Cafe B
South Tyneside Hospital	Restaurant A
South Tyneside Hospital	WRVS
NHS Ealing Office	Cafe
Meals at Home Service Leeds	Meals at Home
Bristol City Council Care Home	Care Home
The Castle Complex Hampshire	Restaurant
The Castle Complex Hampshire	Trolley Service
Civic Hall Leeds	Cafe
Civic Hall Leeds	Vending
Lord Mayors Office Liverpool	Restaurant
Wrenbury Primary School	School kitchen
Wandle Valley Special School	School kitchen
Caldershaw Primary School	School kitchen
Aviation House FSA	Restaurant
Aviation House FSA	Vending
Skipton House DH	Vending
Metropolitan Police Headquarters	Hospitality
Skipton House DH	Canteen
HMP Wealstun	Prison Kitchen
Metropolitan Police Headquarters	Restaurant A
West Yorkshire Police Headquarters	Canteen
Metropolitan Police Headquarters	Cafe
Metropolitan Police Headquarters	Restaurant B
Skipton House DH	Deli Bar
Wellington House DH	Vending
Wellington House DH	Hospitality
Wellington House DH	Canteen
Richmond House DH	Canteen
Richmond House DH	Vending
Richmond House DH	Hospitality
Richmond House DH	Deli Bar
New Kings Beam House DH	Vending
New Kings Beam House DH	Hospitality
New Kings Beam House DH	Deli Bar
Quarry House DH	Shop
Quarry House DH	Deli Bar
Quarry House DH	Hospitality
Quarry House DH	Restaurant
Skipton House DH	Hospitality
Bowbridge Primary School	School kitchen
Royal Bolton Hospital	Staff restaurant
Defra - Smith Square	Restaurant
Defra - Smith Square	Deli Bar
Defra - Smith Square	Hospitality
Liverpool Community College Clarence Street Site	Cafe
Liverpool Community College Clarence Street Site	Vending

Appendix C. Summary of questionnaire content

Criterion	Form A1 (Standard form)	Form A2 (Standard form if they respond 'Yes' to G1)	Form B (Vending form)	Form C (Retail form)	Form D (Meals at Home)
G1	✓	✓			✓
G2	✓	✓	✓	✓	✓
G3	✓	✓	✓	✓	✓
G4	✓	✓	✓	✓	✓
G5	✓	✓	✓	✓	✓
G6	✓	✓			
G7	✓	✓		✓	
G8	✓	✓	✓	✓	
S1	✓		✓	✓	✓
S2	✓		✓	✓	✓
S3	✓		✓	✓	✓
S4	✓		✓	✓	✓
S5	✓	✓	✓	✓	✓
S6	✓	✓	✓	✓	✓
S7	✓	✓	✓	✓	✓
S8	✓			✓	✓
S9	✓	✓	✓	✓	✓
S10	✓	✓	✓	✓	✓
S11	✓	✓	✓	✓	✓
S12	✓	✓	✓	✓	✓
S13	✓	✓	✓	✓	✓
S14	✓	✓			✓
B1	✓				✓
B2	✓	✓			
B3	✓		✓	✓	✓
B4	✓		✓	✓	✓
B5	✓		✓	✓	✓
B6	✓		✓	✓	✓
B7	✓		✓	✓	✓
B8	✓	✓	✓	✓	✓
B9	✓	✓		✓	✓
B10	✓	✓	✓	✓	✓
B11	✓	✓			✓
B12	✓	✓	✓	✓	✓
B13	✓	✓		✓	✓
B14	✓	✓			
B15	✓	✓			
B16	✓	✓			✓
B17	✓	✓			
B18	✓	✓		✓	
B19	✓	✓			✓

Appendix D. Criterion level detailed analysis - nutrition

Criterion B1: Vegetables are cooked without added salt. (*)

Accuracy of self-assessment	Implementation issues
1 accurately reported as met with evidence	<u>Lack of evidence</u> – Many said it was their practice not to use salt when cooking vegetables, but did not have the evidence as specified in the criteria guidance to confirm this. For example one organisation thought the evidence would be within their recipe book but did not find it when they looked. Other outlets indicated that staff were briefed in either inductions or 'team talks', but did not have the evidence stated as needed.
8 outlets reported criterion as met, but were not able to provide the evidence when visited	
4 outlets reported criterion as not met	
7 outlets didn't answer the question or it was not applicable	

Criterion B2: Salt is not available on tables.

Accuracy of self-assessment	Implementation issues
8 accurately reported as met with evidence	<u>Lack of knowledge</u> – One organisation had mis-reported on the availability of salt on tables as the procurement contact was unaware the home kept salt available on tables. Hampshire County Council had made changes since completing the questionnaire and no longer had salt available on tables.
1 outlet reported criterion as met, but were not able to provide the evidence when visited	
6 outlets reported criterion as not met, although 1 of them did meet and had the evidence	
5 outlets didn't answer the question or it was not applicable	

Criterion B3: At least 25% of products procured meet FSA salt targets where relevant and all stock preparations are lower salt varieties (i.e. below 0.6g/100mls reconstituted). (*)

Accuracy of self-assessment	Implementation issues
4 outlets reported criterion as met, but were not able to provide the evidence when visited	<u>Complexity to evaluate</u> – This criterion was perceived as being complicated to evidence or check: it being necessary to check the FSA salt targets for a range of food products; and subsequently provide invoices and specifications for each of these to evidence that the required products have been purchased – as well as providing evidence that the products purchased are 25% of the total.
1 outlet reported they had met the criterion and also reported that they were unable to provide the required evidence	
9 outlets reported criterion as not met	
6 outlets didn't answer the question or it was not applicable	

Criterion B4: Products procured are lower in saturated fat and include reduced fat options where available. In addition, at least 25% of hard yellow cheese has maximum total fat content of 25g/100g; at least 50% of milk is lower fat; and at least 50% of oils and spreads are based on unsaturated fats. (*)

Accuracy of self-assessment	Implementation issues
6 outlets reported criterion as met, but were not able to provide the evidence when visited	<p><u>Range of products</u> – Two organisations had reported meeting this criterion and were able to show evidence of invoices of oil, milk and cheese to meet the more advanced but related criterion S2. However invoices for the other food types within this criterion description (meat, biscuits, cakes, pastries) were not seen on the visit and so the evidence was not sufficient to meet criterion B4.</p> <p>Bristol Care Home had reporting meeting this but did not have evidence.</p>
2 outlets reported they had met the criterion and also reported that they were unable to provide the required evidence	
7 outlets reported criterion as not met	
5 outlets didn't answer the question or it was not applicable	

Criterion B5: At least 25% of breakfast cereals are higher fibre and lower sugars varieties. (*)

Accuracy of self-assessment	Implementation issues
2 accurately reported as met with evidence	<p><u>Difficulty in providing evidence</u> – One organisation had undertaken analysis previously to influence the choice of breakfast cereals bought, however this could not be located on the visit, and breakfast cereals seen on the visit did not appear to meet the criterion and different ones may have been bought since the exercise was undertaken.</p> <p>Other outlets were also not able to provide evidence, although they had reported it as met within the questionnaire.</p>
10 outlets reported they had met the criterion, but were not able to provide the evidence when visited	
8 outlets didn't answer the question or it was not applicable	

Criterion B6: At least 50% of complete meals (i.e. ready prepared meals) are not classified as 'high' (as defined by FSA front of pack nutrient labelling criteria) for more than one of either salt, total fat, saturated fat or added sugars. (*)

Accuracy of self-assessment	Implementation issues
2 accurately reported as met with evidence	<p><u>Misinterpretation of criterion</u> – It is not clear without reading the full guidance for this criterion that it applies to pre-packed sandwiches.</p>
1 outlet reported they had met, but were not able to provide the evidence when visited	
8 outlets reported criterion as not met	
9 outlets didn't answer the question or it was not applicable	

Criterion B7: At least 50% of the volume of desserts available are based on fruit - which can be fresh, canned, dried, frozen or cut up. (*)

Accuracy of self-assessment	Implementation issues
4 outlets accurately reported as met with evidence	<p><u>Misinterpretation of criterion</u> – One outlet had counted desserts containing fruit rather than those based on fruit, and therefore yoghurts containing fruit had been in-correctly included and the criterion was not in fact met.</p> <p>Another outlet had reported meeting the fruit based desserts on menu criterion (B7) however on reviewing the menu the frequency this was offered was not enough to meet the criterion.</p>
5 outlets reported they had met the criterion, but were not able to provide the evidence when visited	
5 reported they had not met the criterion	
6 outlets didn't answer the question or it was not applicable	

Criterion B8: A portion of fruit is cheaper than a portion of hot or cold dessert

Accuracy of self-assessment	Implementation issues
12 outlets accurately reported criterion as met with evidence	<p><u>No issues</u> – The accuracy of reporting suggests this is a criterion easy to achieve, and many outlets may not have needed to make changes to meet this.</p>
1 reported they had met the criterion but did not have the required evidence when visited	
1 reported they had not met the criterion	
6 outlets didn't answer the question or it was not applicable	

Criterion B11: If caterers serve lunch and an evening meal, fish is provided twice a week, one of which is oily. If caterers serve only lunch or an evening meal, an oily fish is available at least once every 3 weeks.

Accuracy of self-assessment	Implementation issues
10 outlets accurately reported as met with evidence	<p><u>No issues</u> – This criterion was applicable to 15 of the outlets (those not vending or retail) and therefore was quite highly achieved. Others who did not report achieving this in the questionnaire may have done so, for example the lead for one outlet reported that he thought they might meet it but hadn't the time to check when completing the survey, and did not have printed menus available to review and check the evidence for this.</p>
1 outlet reported they had met the criterion, but were not able to provide the evidence when visited	
3 reported they had not met the criterion	
6 outlets didn't answer the question or it was not applicable	

Criterion B14: Tap water is visible and freely available and such provision is promoted.

Accuracy of self-assessment	Implementation issues
5 outlets accurately reported as met with evidence	<u>Lack of evidence</u> – 4 organisations couldn't provide complete evidence for providing tap water: some of these organisations had a drinking fountain or cooled water from a mains water supply, however did not have a sign to advertise this and encourage the use of it.
4 outlets reported they had met the criterion, but were not able to provide the evidence when visited	
6 reported they had not met the criterion	
5 outlets didn't answer the question or it was not applicable	

Criterion S1: At least 75% of procured products meet FSA salt targets where relevant and all stock preparations are lower salt varieties (i.e. below 0.6g/100mls reconstituted). (*)

Accuracy of self-assessment	Implementation issues
1 outlet reported they had met with evidence, but were not able to provide the evidence when visited	<u>Lack of evidence</u> – One outlet had reported meeting this, but did not have evidence. It is worth noting that 3 outlets had reported having nutritionally analysed menus (G1) so were exempt from being asked this question.
13 reported they had not met the criterion	
6 outlets didn't answer the question or it was not applicable	

Criterion S2: In addition at least 50% of hard yellow cheese has a maximum total fat content of 25g/100g; at least 75% of milk is reduced fat; and at least 75% of oils and spreads are based on unsaturated fats. (*)

Accuracy of self-assessment	Implementation issues
1 outlet accurately reported as met with evidence	<u>Lack of evidence</u> – One organisation met the criterion for oils and milk, but did not for cheese – they reported using less cheese instead – however although this would reduce fat content of a meal it would not meet the definition of the criterion.
2 outlets reported they had met the criterion, but were not able to provide the evidence when visited	
11 reported they had not met the criterion	
6 outlets didn't answer the question or it was not applicable	

Criterion S3: At least 50% of breakfast cereals are higher fibre and lower sugars varieties. (*)

Accuracy of self-assessment	Implementation issues
6 outlets accurately reported as met with evidence	<u>Difficulty in providing evidence</u> – FSA’s Aviation House outlet reported having undertaken analysis of what they stocked, the available cereals and changed purchasing as a result to meet the criterion. Also see comments for criterion B5
3 outlets reported they had met, but were not able to provide the evidence when visited	
2 reported they had not met the criterion	
9 outlets didn’t answer the question or it was not applicable	

Criterion S4: At least 75% of complete meals (i.e. ready prepared meals) are not classified as ‘high’ (as defined by FSA front of pack nutrient labelling criteria) for more than one of either salt, total fat, saturated fat or added sugars. (*)

Accuracy of self-assessment	Implementation issues
1 outlet accurately reported as met with evidence	<u>Misinterpretation of criterion</u> – Many outlets visited reported not buying complete meals, but buying pre-packed sandwiches. The FSA’s Aviation House outlet lead had undertaken an analysis of sandwiches and changed their ordering as a result. Also see criterion B6
1 outlet reported they had met, but were not able to provide the evidence when visited	
9 reported they had not met the criterion	
9 outlets didn’t answer the question or it was not applicable	

Criterion S5: Savoury snacks are only available in packet sizes of 35g or less.

Accuracy of self-assessment	Implementation issues
6 outlets accurately reported as met with evidence	<u>Commercial impact</u> – Although this might be considered a relatively easy criterion to meet, only 6 of the visited outlets met this. One outlet reported that they did not meet this as they stocked a particular brand of crisps which were a 40g pack size – this may be an issue of outlets wanting to provide a variety to customers, and not compromise a commercial opportunity. One of the Royal Bolton Hospital leads highlighted that they had taken a decision to stock lower fat crisps, however these came in a larger pack size – 37g so did not meet the criterion although healthier than normal crisps.
3 outlets reported they had met, but were not able to provide the evidence when visited	
7 reported they had not met the criterion	
4 outlets didn’t answer the question or it was not applicable	

Criterion S6: Confectionery and packet sweet snacks are in the smallest standard single serve portion size available within the market.

Accuracy of self-assessment	Implementation issues
5 outlets accurately reported as met with evidence	<u>Customer choice</u> – This was met by only 5 outlets – and was relatively easy to evidence. One lead expressed the issue of providing choice to customers, and that if this was not done, they would purchase items from shops outside the building instead.
11 reported they had not met the criterion	
4 outlets didn't answer the question or it was not applicable	

Criterion S7: All sugar containing drinks are available in no more than a 330ml portion size.

Accuracy of self-assessment	Implementation issues
6 outlets accurately reported as met with evidence	<u>Misinterpretation of criterion</u> – One restaurant outlet had reported meeting this criterion with evidence, and almost met it, however had forgotten to consider hot sugary drinks such as hot chocolate and mocha coffee.
1 outlet reported they had met, but were not able to provide the evidence when visited	
11 reported they had not met the criterion	
2 outlets didn't answer the question or it was not applicable	

Criterion S8: Meal deals include a starchy carbohydrate and at least 1 portion of vegetables and 1 portion of fruit. (*)

Accuracy of self-assessment	Implementation issues
1 outlet accurately reported as met with evidence	<u>No issues</u> – Five of the outlets visited had reported this criterion as not applicable – several outlets reported they did not offer meal deals; it was not posed to the three vending machine outlets, nor the three organisations that met the nutritionally analysed menu criterion (G1).
1 outlet reported they had met the criterion but did not have the evidence when visited	
7 reported they had not met the criterion	
11 outlets didn't answer the question or it was not applicable	

Criterion G1: Menu cycles are analysed to meet stated nutrient based standards relevant to the major population subgroup of catering provision.

Accuracy of self-assessment	Implementation issues
2 outlets accurately reported as met with evidence	<u>Lack of evidence</u> – HMP Wealstun were in the process of nutritional analysis using an excel spreadsheet developed by NHS Leeds PCT.
1 outlet reported they had met the criterion, but were not able to provide the evidence when visited	They had not used a software package and therefore could not provide the evidence specified within the guidance. The Aviation House (FSA) lead had purchased software, and was inputting information into this to enable them to analyse their menus but was not at a stage to report meeting this criterion. The two outlets able to evidence this were schools.
12 reported they had not met the criterion	
5 outlets didn't answer the question or it was not applicable	

Criterion G2: Menus (for food and beverages) include calorie and allergen labelling.

Accuracy of self-assessment	Implementation issues
1 outlet reported they had met the criterion, but were not able to provide the evidence when visited	<u>Lack of evidence</u> – Whilst some outlets provided some calorie labelling, such as FSA's Aviation House restaurant of DH's Wellington House restaurant, none were currently able to provide the level of detail the criterion required for the content of particular allergens on menus.
17 reported they had not met the criterion	Schools reported it was not appropriate for a school environment due to the risk of eating disorders, and also that they had their own systems for managing the allergies of children.
2 outlets didn't answer the question or it was not applicable	

Appendix E. Criterion level detailed analysis - sustainability

Criterion B9: A sustainability policy is in place for food procurement and catering services and publicised to users.

Accuracy of self-assessment	Implementation issues
5 accurately reported as met with evidence	<u>Level of detail required</u> – The Metropolitan Police did have a policy, and set new targets each year for each division including catering which were signed up to at a corporate level. However for other organisations/outlets the level of detail, or committed actions within policies varied, and the policies presented as evidence for most were for their entire organisation rather than for specific sites or outlets. This criterion would benefit from greater clarity to enable greater understanding and accuracy in implementation and assessment.
1 outlet reported criterion as met, but were not able to provide the evidence when visited	
2 outlets reported they had met the criterion and also reported that they were unable to provide the required evidence	
9 outlets reported criterion as not met, although 4 of them did meet and had the evidence	
3 outlets didn't answer the question or it was not applicable	

Criterion B10: At least 25% of all seafood products procured are from sustainable sources.

Accuracy of self-assessment	Implementation issues
7 outlets accurately reported as met with evidence	<u>Lack of knowledge</u> – One organisation was not sure if they met this: they purchased fish through central procurement arrangements. The lead for another was able to provide evidence of purchasing some MSC certified seafood but could not confirm what proportion this was of their total seafood purchasing.
2 outlets reported they had met, but were not able to provide the evidence when visited	
8 reported they had not met the criterion	<u>Cost implication</u> – Concerns were expressed by one lead visited regarding the cost of meeting this criterion, and also of being able to find the products required – this would need pressure on the central procurement chain to add further suppliers to the list of companies that could be used. There was a specific problem for one outlet in finding catering pack sizes of tuna which were dolphin-friendly certified.
3 outlets didn't answer the question or it was not applicable	

Criterion B12: At least 75% of meat and meat products are farm assured or equivalent as a welfare minimum.

Accuracy of self-assessment	Implementation issues
3 outlets accurately reported as met with evidence	<u>Lack of evidence</u> – Several sites were unable to provide evidence within the time available. One caterer indicated they were weighing up available options to change purchasing to meet this criterion, however were finding that some products provided by the central supply company met this criterion but did not meet the criteria on salt content (B3 and S1) and vice versa.
5 outlets reported they had met, but were not able to provide the evidence when visited	
9 reported they had not met the criterion	
3 outlets didn't answer the question or it was not applicable	

Criterion B13: 100% of eggs (in shell) are sourced from systems which do not use conventional cages. If eggs are sourced from a cage system, they should be sourced from an enriched cage system.

Accuracy of self-assessment	Implementation issues
11 outlets accurately reported as met with evidence	<u>Cost implications</u> – One outlet lead was identifying the cost to move to purchasing only eggs from free range/enriched cage systems – there were concerns over whether it would be possible to make the change without charging more for food within the restaurant. <u>Lack of evidence</u> – Another lead reported this criterion was met, but however forwarded evidence relating to Lion Mark eggs which are not free-range. One organisation did not currently purchase eggs from enriched cages or free-range chickens, but questioned whether the criterion was aspirational enough or whether it should be for free range eggs only (and not enriched cages also).
2 outlets reported they had met the criterion, but were not able to provide the evidence when visited	
2 reported they had not met the criterion	
5 outlets didn't answer the question or it was not applicable	

Criterion B15: Any replacement or new equipment bought is brought from the top two categories as per the EU energy label.

Accuracy of self-assessment	Implementation issues
7 outlets accurately reported as met with evidence	<u>Responsibility of another department</u> – Many organisations reported that equipment was bought within OGC buying guidelines. For some organisations visited the purchasing of equipment was beyond the direct control of the HFM leads and equipment was purchased by another section of the organisation, or by the 'host' organisation such as FSA (rather than the catering company) or the schools directly (rather than the local authority).
2 outlets reported they had met the criterion, but were not able to provide the evidence when visited	
6 reported they had not met the criterion of which 1 did and had the evidence	
5 outlets didn't answer the question or it was not applicable	

