



**NHS Scotland
Food Policy Guidance
For external lease or in-house run
retail and catering operations**

Definition of Terms

This guidance paper refers to catering, retail, mixed outlets and trolley services.

In this guidance paper their meaning is as follows:

Catering outlets are those where most food is prepared before it is served to the customer either to be consumed on-site or taken away. An example would be a tea bar, restaurant or vending operation. Catering outlets in healthcare buildings should comply with the **healthy living award** (HLA).

For information on the award please see www.healthylivingaward.co.uk

Retail outlets are those where food is not prepared on-site, rather it is ready for immediate purchase. Examples include a convenience store, newsagent, mobile or pop-up store or trolley service. Retail outlets in healthcare buildings should comply with the **SGF Healthcare Retail Standard** (HRS).

For information on the standards please see

<http://www.gov.scot/Publications/2015/09/7885>

Mixed outlets offer a combination of catering and retail provision. Mixed outlets in healthcare buildings should comply with both the **SGF Healthcare Retail Standard** (HRS) and the **healthy living award** (HLA). For these outlets, a single assessment will apply in accordance with whatever is the predominant activity – retail or catering.

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1. Commitment to Food and Health

1.1 Rationale for Food Retail Policy

NHS Scotland has a pivotal responsibility to promote health within its population. The relationship between diet and health status is unequivocal. The Scottish Government has endorsed a policy position on food, fluid and nutrition for many years now. Current governance around the sale of food and associated food products lies between healthy living award and the Scottish Grocers Federation Gold Standard.

A new Healthcare Retail Standard has been created that will set minimum requirements for healthy food offerings across all internal NHS-run and external retail leases within all health boards in Scotland. This will become a mandatory requirement for all retail suppliers to meet from 1st April 2017.

The Policy is aligned with national policy and guidance for healthy eating such as 'Recipe for Success – Scotland's Drink and Food Policy (2009)' and 'Obesity Route Map' (2010) and the 'Chief Executive Letter 01 (CEL1) Health Promoting Health Service' (2010) requiring the NHS to increase availability, access and opportunities for healthier choices around food and drink for staff, visitors and patients in our hospitals. (This guidance **does not** cover inpatient hospital food provision which is detailed in other national standards and policy).

This Food Retail policy supports the delivery of the following Food Fluid and Nutrition policy objectives:

- **Objective 1:** The promotion of healthy and safe food options for the NHS Scotland population
- **Objective 2:** The availability of an acceptable and appropriate healthy diet for employees, visitors and outpatients within all NHS hospital premises

The purpose of the Food Retail Policy is to increase and promote access to healthier food and drink choices for patients, visitors and staff throughout NHS facilities, maintain compliance with associated national policy and develop best practice for NHS Scotland.

This policy aims to:

- Determine the nutritional specification for food and drink provided for sale by in-house and external retailers, cafes, vending suppliers and voluntary organisations
- Communicate expectations regarding the promotion of all food and drink provided for sale on NHS Scotland premises.

1.2 Policy Statement

NHS Scotland, through “Health Promoting Health Service” initiatives, is committed to the continuous improvement of the diet of our population and will demonstrate this through the delivery of healthier food and drink choices throughout all retail facilities located within NHS Scotland estate.

1.3 Policy Commitment /Roles and Responsibilities

The policy requires visible commitment and leadership at all levels across the NHS to ensure exemplary practice is achieved. Leadership for the policy will be developed through:

- Sponsorship for the policy from the individual board’s representatives
- Adoption and assessment of a nutritional specification for all external retailers and voluntary organisations as part of standardised ‘leasing’ arrangements
- Adoption and assessment of a nutritional specification for all internal retail and/or catering (inc food vending) facilities as part of standard operating
- Development of promotional interventions to increase the uptake of healthier choices in collaboration with internal/external providers and stakeholders
- Compliance reporting on all associated national standards including Health Promoting Health Service.

2. Policy into Practice

2.1 Scope of the Policy

The Food Retail policy (will) operate in conjunction with NHS Scotland’s CEL with healthy living award plus and Healthcare Retail Standard and encompasses all aspects of food and drink sales across the various retail locations in scope.

The policy therefore extends to all in-house and externally managed services including:

- Cafes and restaurants
- Trolley services
- Meal vending
- Other vending (drinks, snacks etc)
- Hospitality functions
- Retail shops
- Market stalls
- Fruit barras
- Hospitality functions
- Mobile food vans operating on hospital grounds

The monitoring around compliance for vending machines will depend on the type of vending service:

- Where the vending service comprises part of the catering offer e.g. within a café or restaurant this will continue to be monitored as part of compliance against the healthy living award
- Where there is a vending offer of drinks and snacks provided by a vending supplier e.g. outwith the catered site and/or stand alone this will need to comply with the Guidance on Vending for Healthcare Settings. While this is comparable to the above these services will be self-assessed by the local HRS lead within the board and compliance information will be reported to HFS for national monitoring and reporting purposes.

The policy incorporates and builds on existing nutritional expectations/specifications in place within NHSScotland and includes:

- Healthy living standard and plus award (HLA) www.healthylivingaward.co.uk
- The Healthcare Retail Standard (HRS) <http://www.gov.scot/Publications/2015/09/7885> applies only to those retail outlets within healthcare buildings. Retailers interested in joining the Healthy Living Programme for shops outside healthcare buildings should view <http://www.scottishshop.org.uk/sgfhlp> or for more information a number of NHS Scotland representatives are based within facilities shared with partner organisations including the Strategic Retail Group. This policy (and specific nutritional specifications) is suitable for adoption with partner organisations through local negotiation.

2.2 Policy Outcomes

The expected outcomes for the Food Retail Policy are:

- a) All cafes/dining facilities will achieve **healthy living award** (HLA) plus criteria as required by CEL 2015
- b) All in-house café/dining facilities will adopt a pricing structure that favours healthier options.
- c) All retail outlets and shops will provide a range of healthier options as core retail items in line with **Healthcare Retail Standard** (HRS)
- d) All retail outlets and shops will clearly promote healthier choices through use of NHS branded promotional logos, signage etc. in line with HRS
- e) All retail outlets and shops will only promote healthier options at point of sale
- f) All commercial advertising (such as that located on vending machines, shop fronts etc) on NHS premises will only include products that meet CRS criteria for promotion
- g) All trolley services will include a defined range of healthier options and meet the HRS provision criteria
- h) Fruit and vegetables will be made available for routine sale in all major acute sites
- i) The range of healthier products routinely offered for sale will be extended through liaison with National Procurement/National Facilities contracts

- j) Suppliers make use of HLA branding or the SGF Eat Better Feel Better promotional materials as appropriate
- k) NHS Scotland will maintain a zero tolerance approach to the sale of all tobacco products and alcohol.

2.3 Scheme of Accountability

The Food Retail Policy requires an integrated approach across NHSScotland which will be facilitated by the Strategic Retail Group (adopted from working methodology currently operating in NHS Greater Glasgow & Clyde) and its associated sub-structures.

Implementation and rollout across all NHS Scotland would require boards to document:

- Annual progress reports on workplan and policy outcomes
- Annual compliance report on vending operations within the board

Healthyliving and Scottish Grocer's Federation will compile annual reports on NHSScotland's compliance to HLA and HRS respectively.

2.4 Contractual Arrangements

The Food Retail Policy will be a requirement of all new lease arrangements and will be included as part of the tender process; compliance with the HRS standards has been added to the NHS Heads of Terms. All existing leasing will be reviewed in line with renewals of lease agreements. Ongoing noncompliance with the policy will be subject to local investigation and the review of current contracts.

The HRS Implementation Group is considering how it can support boards in dealing with PFI and lengthy contracts. The contracts within PFI sites will generally be sub-contracted arrangements and therefore not covered under the NHS Heads of Terms. Such contracts will need to be considered and it will be the responsibility of the NHS board to take steps to support the retailers to achieve compliance in these sites.

3. Impact Assessment

3.1 EQIA

NHS Scotland acknowledges that food choice and dietary intake are influenced by generational, cultural, religious, environmental, socio-economic and lifestyle factors.

A national EQIA review has been undertaken and it is recognised that the content of this policy will not have an impact on the availability of foods that comply with religious dietary requirements. It is recommended that food retail services continue to provide suitable options as part of the range of items offered for sale.

3.2 Risk

There is a risk that NHSScotland does not (directly and/or via external providers) consistently provide sufficient healthier options to enable staff, visitors and patients to easily access a healthy diet whilst on NHS Scotland premises. Adoption of policy will help mitigate this risk.

There is a high risk of NHSScotland exposure to negative publicity regarding compliance with national standards and policies as well as public expectation of NHS organisations to provide exemplary practice in healthy eating. Adoption of policy will help mitigate this risk.

The Retail Policy may require national companies to change existing product ranges to meet criteria and may impact on commercial lease values. Feasibility scoping and annual reporting arrangements with external companies will inform ongoing policy review.

Current in-house services are required to comply with specification outlined in the policy and demonstrate high levels of compliance. External services with existing lease arrangements are not subject to compliance which may impact negatively on footfall and sales within NHS services. Ensuring that all services are subject to similar nutritional specifications regardless of in-house or external operation will ensure greater consistency. A review of current leasing arrangements by the Strategic Retail Review Group will identify all commercial leases currently in place and any future ones implemented.

External provider services may challenge implementation on an ongoing basis. Detailed monitoring arrangements will be required for external providers. Individual NHS Scotland Boards will implement sanctions for non compliance.

4. Communication and Dissemination

Extensive consultation will be undertaken with current and potential external providers to agree feasibility in line with all new and renewed lease arrangements. Negotiation with existing lease holders will be undertaken prior to dissemination of the policy.

The Food Retail Policy supports action to improve employee health and therefore will be considered by Boards Area Partnership Forums (APF).

This Food Retail Policy will be available centrally on the Health Facilities Scotland website.

The policy will be made available on request in alternative formats. Requests for alternative formats should be made to Health Facilities Scotland.

5. Evaluation

The implementation and effectiveness of the policy will be evaluated in relation to achievement of policy outcomes.

A monitoring framework will be developed in relation to each outcome and will report back the individual Board's Directors of Facilities.

In addition, the ongoing review of compliance against national standards such as HLA/HRS will be undertaken by Healthy Living Programme and Scottish Grocer's Federation external to the Board.