

Equality Impact Assessment Form

Before completing this form, please refer to [the supporting guidance document](#) and alert the Policy Team (Insert email).

The purpose of the assessment is to identify risks and the following actions should be taken to treat any known equality risks

- Remove risks: abandon the proposed policy or practice
- Mitigate risks – amend the proposed policy or practice so that risks are reduced
- Justify policy or practice in terms of other objectives

Public Sector Equality Duty

Compliance with the equality duties ensures Leicestershire County Council can demonstrate it is making decisions in a fair, transparent, and accountable way by considering the needs and rights of different members of the community. The Public Sector Equality Duty (PSED) in the Equality Act 2010 places the County Council (or a third-party exercising function on its behalf) under a duty to have "**due regard**" to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic and those who do not. The nine protected characteristics are: age; disability; gender reassignment; pregnancy and maternity; race, religion, or belief; marriage and civil partnership, sex, and sexual orientation. The fact that others outside these protected groups are also affected by any decision, does not affect the operation of the PSED.

The requirement to advance equality of opportunity requires the decision-maker to have due regard to the need to remove or minimise disadvantages suffered by persons who share a relevant protective characteristic, take steps to meet their needs and encourage them to participate in public life or in any other activity in which participation is disproportionately low. Fostering good relationships requires the decision-maker to have due regard to the need to tackle prejudice and promote understanding. The statutory framework recognises that compliance with the public sector equality duty may involve treating some persons more favorably than others.

1- Policy details	
Name of policy	Whole School approach to Food and Nutrition programme (WSAF&N)
Department and service	Public Health – Health Related Harm
Who has been involved in completing the Equality Impact Assessment?	Sham Mahmood, Strategic Lead for Maternal and Children’s Health
Contact numbers	0116 305 1644
Date of completion	Started 06.09.23 – updated using new template on 20.09.23

2- Objectives and background of policy or practice change

Use this section to describe the policy or practice change . What is the purpose, expected outcomes and rationale? Include the background information and context

What is the proposal?

Background

The Whole School Approach to Food and Nutrition (WSAF&N) contract was first commissioned in 2013 and has been a programme that is familiar with the schools it is embedded in, namely primary schools. The programme is known locally in schools as the Food for Life programme. The service is provided by the Soil Association via a contract due to expire on 31st May 2024, with all extension opportunities exhausted.

The programmes current objectives are to:

- Universally engage schools across Leicestershire to the flagship Food for Life (FFL) programme.
- Plan and deliver a high-profile campaign approach to facilitate engagement
- Build a high-profile visible programme, reconnecting pupils with where food comes from and normalising a good food culture in schools through one to one support, training and guiding schools through WSAF framework, Bronze Silver and Gold.
- Enable commissioned partners and others to coalesce with FFL programme and build partnership across the council and at a local level.

The WSAF&N contract supports schools to achieve bronze silver and gold criterion that results in an award for the school. Initially, the service included secondary schools (2013-2020) without uptake, leading to a decision to focus on primary schools

The programme is a key part of the public health approach to tackling obesity in children and young people. It is currently delivered via 204 primary local schools who have opted into the programme. The service is offered to all schools but with additional emphasis on supporting school identified with high levels of obesity. It fits well with a number of local and national programmes and strategies and the National Food Strategy signposts local authorities to adopt the model, indicating a desire to make the approach mandatory in the future.

	<p>A Cabinet decision in February 2023 has identified the WSAF&N as a savings target within the Medium-Term Financial Strategy (MTFS). The savings target is £150k per annum from April 2023.</p> <p>Public Health DMT have reviewed an options appraisal for achieving the MTFS saving from the WSAF&N. It is clear that some aspects of the current offer are valued by schools and are aligned to work that forms an important part of the PH offer, particularly in relation to obesity.</p> <p><u>What is the Change?</u></p> <p>Officer support for schools wanting to achieve the bronze award will remain under the new proposal but this would be targeted at schools with higher levels of obesity. Schools wishing to continue to silver, and gold level would need to do so without officer support using the online support and training available from the Soil Association.</p>
<p>What is the rationale for this proposal?</p>	<p>The WSAF&N offer sits within a broader food and nutrition approach within Public Health that is currently being reviewed. This service should be considered as part of the wider food and nutrition work and would benefit from a review.</p> <p>It is therefore proposed that a new WSAF&N offer is retained for 2 years, using Public Health reserves. This 2 year period will allow time for a thorough review of the wider food and nutrition offer including evaluation of whether WSAF&N is an essential part of this.</p>
<p>What change and impact is intended by the proposal?</p>	<p>The current offer provides 2 officers to support schools through the awards criteria, help support online training and upload evidence on the portal to all primary schools in Leicestershire to achieve the 'Food for Life' bronze, silver, and gold award packages. These awards are centred around four areas of development, which link to criteria and create an active framework for each school:</p> <ul style="list-style-type: none"> • Food Quality, • Food Leadership and Food Culture,

- Food Education
- Community partnerships

We are proposing to change and refine the offer, and as a minimum, we would like all primary schools to achieve Bronze-level. The proposed offer will include:

- an online training platform for all schools to replace reduced officer support
- targeted officer support for schools with high levels of obesity wanting to achieve bronze level (for those schools with a lower level of obesity, this may result in a reduced level of support)
- removal of officer support for all schools to achieve the gold and silver awards, however, schools can still access these independently.

The impact may be that some schools (particularly those with low levels of obesity aiming to achieve bronze and all schools aiming to achieve silver and gold), may not engage with the programme due to the reduced officer capacity to guide them through.

3- Evidence gathered on equality implications - Data and engagement

What evidence about potential equality impacts is already available?

This could come from research, service analysis, questionnaires, and engagement with protected characteristics groups

What equalities information or data has been

There is National Child Measurement data that identifies schools with high levels of obesity. School engagement data and impact of the service has been collected over a course of the contract. Obesity rates are increasing in primary school-aged children, with a notable difference between reception and year 6. However, the system lacks the capacity to analyse the progression of children from reception to year 6. The focus on using schools with high levels of obesity and target the officer support towards the schools in the most deprived areas with high levels of obesity will, in the long term, reduce obesity levels.

gathered so far?

What does it show?

The information showed that:

- The provision should ensure equitable access across Leicestershire as the offer is available to all schools.
- A bespoke offer was in place that allows schools support online and face to face
- 80% of the schools targeted with high levels of obesity did engage with the programme
- Easy access to the portal was in place with clear guidance to upload evidence

Food insecurity defined as 'lack of access to adequate, nutritious food in a socially acceptable way' - mapping data has found 8% of households to be food insecure and 6% to be marginally food insecure. Data also shows the steep increase in Food Bank usage since 2016 reaching a peak overall distribution of food parcels in 20/21 of 138,767 across the East Midlands, 29,739 (21.4%) of which distributed to Leicestershire residents through Trussell Trust emergency food provision. This doesn't account for other emergency food provision providers present within the region, but one study suggests that they underwent a similar growth.



DMT Presentation-
Food Insecurity Map

- Real-time data source on the cost of living measurements, providing information on energy debts, council tax arrears and food bank usage. <https://public.flourish.studio/story/1634399/>
- The cost of living crisis by District is particularly interesting in 2019 the most common type of debt in our districts was a mix of council tax, rent arrears and credit/store card and now for all districts- it is energy bills <https://public.flourish.studio/story/1775079/>
- Fuel poverty fingertips data- <https://fingertips.phe.org.uk/search/fuel#page/3/gid/1/ati/501/iid/93759/age/-1/sex/-1/cat/-1/ctp/-1/yr/1/cid/4/tbm/1/page-options/car-do-0>

- Low income fingertips data- <https://fingertips.phe.org.uk/search/low%20income>
- Fingertips poverty data-
<https://fingertips.phe.org.uk/search/poverty#page/3/gid/1/pat/6/par/E12000008/ati/501/are/E07000223/iid/93553/age/1/sex/4/cat/-1/ctp/-1/yrr/1/cid/4/tbm/1>
- Modelled mapping data for adults food insecurity-
<https://shefuni.maps.arcgis.com/apps/instant/interactivelegend/index.html?appid=8be0cd9e18904c258afd3c959d6fc4d7>
- LSOA Modelled data- <https://www.mylocalmap.org.uk/iaahealth/> (needs a bit of experimentation to get to grips with the interface but may be useful- happy to help if needed)

Governments FI report- <https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2021/united-kingdom-food-security-report-2021-theme-4-food-security-at-household-level>

The local government association (2023) cites lack of income (particularly a sudden loss of income due to benefit delays and benefit sanctions), rather than food scarcity, as the main driver of hunger, food poverty and food related health inequalities in England. The impact on children's physical health is greater and if the cycle continues can have a greater impact on mental health and emotional wellbeing and children's developmental health including negatively affecting the academic success.

Children in IMD decile 1-3 are significantly impacted. There are a number of schools in deprived areas that have undertaken the Bronze level as a minimum.

Below map provides information by IMD area and schools taking part in the FFL programme.

LSOA Deprivation (IMD 2019) and Food For Life (FFL) Programme Award Achievement for schools in Leicestershire (2022/23)

County Index of Multiple Deprivation (IMD) Quintile: 1 = Most Deprived, 5 = Least Deprived

FFL Programme Award Level

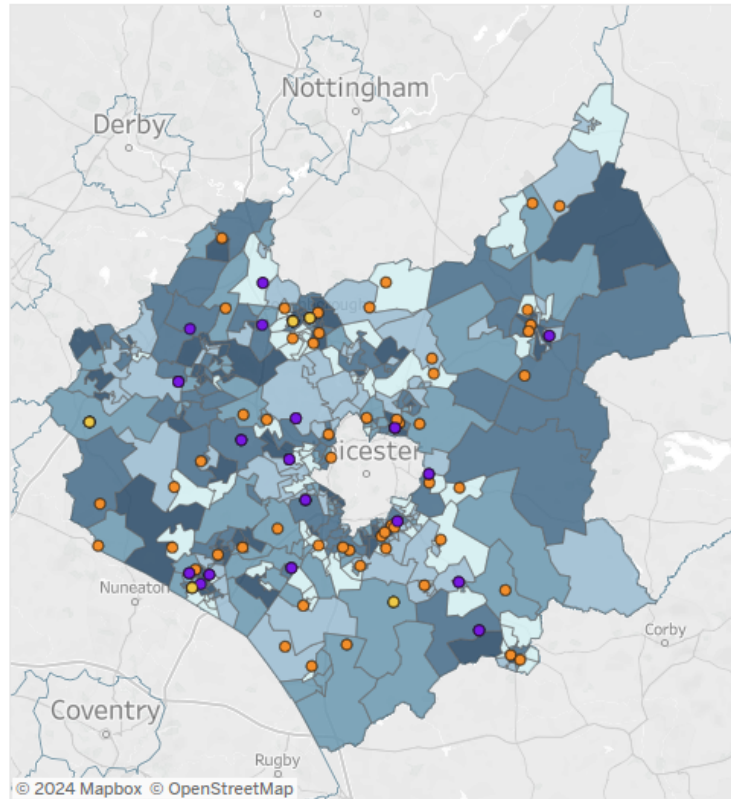
County Quintile

(All)

(All)

1 2 3 4 5

Award Level Gold Silver Bronze



Number of schools by county IMD quintile and FFL Programme award level achieved

County Quintile	Award Level	Number of Schools
1	Bronze	11
	Silver	4
	Gold	1
2	Bronze	13
	Silver	4
	Gold	0
3	Bronze	20
	Silver	5
	Gold	3
4	Bronze	16
	Silver	6
	Gold	1
5	Bronze	16
	Silver	3

Click on the circle below for a full FFL Programme School list by county IMD quintile and FFL programme award level

Select a quintile or award level on the chart above to view the list of schools that fall within your selection.

Note: Saint John Fisher Catholic Voluntary Academy, Wigston, Leicestershire appears in the raw data twice for award level bronze, this school is therefore included twice in the count in the chart on the right for County Quintile: 1, Award Level: Bronze. When multiple award levels are shown on the map, only the highest award level achieved will be visible for each school.

Please do not share this data outside of the Public Health Department.

Data Sources: Leicestershire Food For Life Programme Data 2022/23 and The English Indices of Deprivation 2019 | Last Updated: October 2023

<p>Which protected characteristic groups or organisations have been engaged with so far?</p>	<p>Children of primary school age.</p> <p>No single characteristics have been singled out and those schools that have been in contact with the FFL programme have been asked about their needs as a cohort rather than individual characteristics.</p>		
<p>4- Benefits, concerns and mitigating action</p> <p>Please specify if any individuals or community groups who identify with any of the 'protected characteristics' may <i>potentially</i> be affected by the policy and describe any benefits and concerns including any barriers.</p> <p>Use this section to demonstrate how risks would be mitigated for each affected group</p>			
<p>Group</p>	<p>What are the benefits of the proposal for those from the following groups?</p>	<p>What are the concerns identified and how will these affect those from the following groups?</p>	<p>How will the known concerns be mitigated?</p>
<p>Age</p>	<ul style="list-style-type: none"> All primary schools are offered the service The service was initially including secondary schools too (2013 – 2020) but no school took up the offer in the older age group. It was 	<ul style="list-style-type: none"> Obesity is increasing year on year in the primary school age. There is a huge difference in children in reception year and those measured in year 6. 	<ul style="list-style-type: none"> Using NCMP data the FFL service will target schools with high levels of obesity. Targeting high obesity levels in primary schools, supported by NCMP data, addresses a concerning trend.

decided that as primary schools are willing to take up the offer the COM-B approach to behaviour change should affect children and their approach to food as they move up the school years therefore targeting primary schools was beneficial for current and future decision making.

- There is a gap in analysis work as the system isn't setup to assess the comparison in reception age children and when they move up to year 6.

- Focusing on primary schools aligns with the COM-B approach for effective behaviour change in children.
- This will be regularly monitored to ensure the right schools are participating in achieving and maintaining the bronze standard.
- Officer support will be supporting these schools to embark on the programme.
- The criteria within the bronze level is key to ensuring that schools are able to demonstrate how they meet the standards including menus are of quality, demonstrating that they meet national guidelines, at least 75% of food is freshly prepared.



Bronze
-FFL-Criteria_LAYOUT'

- The Healthy Tots programme will also compliment the FFL awards programme as their offer to support early years teachers/practitioners to understand the how they can provide a healthy culture within their settings.

			<p><u>Healthy Tots Website</u></p> <p>Analysis Enhancement:</p> <ul style="list-style-type: none"> • Develop the system's capacity to analyse and compare changes in children's behaviour toward food from reception to year 6. <p>Primary School Focus:</p> <ul style="list-style-type: none"> • Continue targeting primary schools but ensure the program is adaptable to the evolving needs of children as they progress through school. <p>Data-Driven Monitoring:</p> <ul style="list-style-type: none"> • Regularly monitor obesity levels in primary schools, guided by NCMP data, to ensure timely and targeted interventions.
<p>Disability</p>	<p>The service is also offered to SEND primary schools where the programme will support schools to maintain a culture and leadership approach for children with additional needs to adopt a healthy eating approach and can support to understand</p>	<p>CYP with disabilities/learning difficulties are more likely to be obese than children without disabilities and this risk increases with age. They are at greater risk of serious obesity-related health conditions such as diabetes, asthma, musculoskeletal problems and cardiovascular risk factors.</p>	<p>The service is also offered to SEND primary schools with online support and training to deliver bronze level award. The program recognizes the higher risk of obesity among CYP with disabilities and aims to address it through targeted support.</p>

	<p>the connections between food and feeling good and being healthy.</p>	<p>Factors linking disability and obesity among children and young people include diet, physical activity, parental attitudes and behaviour, access to recreational facilities, medication and genetics. They are likely to experience health inequalities and these can be increased by obesity ¹</p>	<p>Online support and training are provided to SEND primary schools, ensuring accessibility.</p> <p>The provision of services to SEND primary schools underscores compliance with the statutory duty to make reasonable adjustments in line with the Equality Act, Section 149. The program exemplifies an earnest commitment to fulfilling the Public Sector Equality Duty, as stipulated in Section 149(1) of the Equality Act, by identifying and addressing health inequalities among individuals with disabilities. Tailored support for SEND schools and accessible online training, align with the duty to promote equality, foster inclusivity, and mitigate potential discrimination, as mandated by the Equality Act.</p> <p>The program's consideration for individuals with disabilities reflects a comprehensive approach to achieving equality, and the identified impacts and recommendations appear to adequately address the legal obligations outlined in the Equality Act and the</p>
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¹ <https://www.gov.uk/government/publications/obesity-weight-management-and-people-with-learning-disabilities/obesity-and-weight-management-for-people-with-learning-disabilities-guidance>

			Public Sector Equality Duty. Continued collaboration and diligence in implementation are embedded, working closely with schools to ensure sustained positive outcomes for individuals with disabilities.
Race	<p>The FFL programme supports schools to consider a menu that serves wide diversity of children</p> <ul style="list-style-type: none"> • by making a commitment to serve meals cooked from scratch, using sustainable fish, free range eggs and British meat that can be traced back to the farm. • Reassuring diners that your menus have been certified by the UK's leading sustainable food charity. • Using more locally sourced and ethical ingredients that support your local economy and are better for health, nature and our climate. <p>Meals served to Food for Life Served Here standards positively impact:</p> <ul style="list-style-type: none"> • Customers 	<p>Children from BAME background, particularly those from Indian/Pakistani heritage have been identified in previous NCMP as underweight in comparison to children generally.</p>	<p>Bronze level award achieved will provide evidence that schools have understood and supported children with a wide choice of food that meet FFL served here standards</p> <p>The FFL programme's commitment to cultural diversity and inclusivity is in its promotional materials and communications.</p> <p>Engagement with diverse communities to understand specific dietary needs and preferences, ensuring the programme caters to various cultural backgrounds is part of the programme.</p>

	<ul style="list-style-type: none"> • Kitchen teams • Local economy 		
Sex	Nil – on balance there aren't any positive or negative implications	N/A	N/A
Gender Reassignment	Nil – on balance there aren't any positive or negative implications	N/A	N/A
Marriage and Civil Partnership	Nil – on balance there aren't any positive or negative implications	N/A	N/A
Sexual Orientation	Nil – on balance there aren't any positive or negative implications	N/A	N/A
Pregnancy and Maternity	Nil – on balance there aren't any positive or negative implications	N/A	N/A

Religion or Belief	Nil – on balance there aren't any positive or negative implications	N/A	N/A
Other groups: e.g., rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, deprived, or disadvantaged communities	<p>Primary schools in the most deprived areas will receive officer support to meet the bronze standard. These schools are also identified with high levels of obesity.</p> <p>All schools will have access to the same level of support using the online portal.</p>		<p>Wider interaction with relevant stakeholders will ensure that the offer is being promoted and access monitored through contract management.</p> <p>Carers:</p> <ul style="list-style-type: none"> • The online portal provides accessibility and flexibility for school consideration of carers. Ensuring all schools have equal access to the online portal aligns with the principles of fairness and accessibility mandated by the Equality Act. • Specific support mechanisms built in on the online platform for carers could help to address their unique challenges. • While the online portal provides equal access, considering the unique challenges faced by carers and incorporating specific resources or support mechanisms could enhance inclusivity. Online training will provide

information to resources to enable schools to ensure inclusivity.

Asylum Seeker and Refugee Communities:

- Officer support and online portal access can assist schools with diverse student populations, including asylum seekers and refugees.
- Additional considerations address the unique dietary needs and cultural backgrounds of asylum seeker and refugee communities.
- The broader access to the online portal and engagement with stakeholders aligns with the Equality Act's provisions related to promoting equality and eliminating discrimination based on ethnicity.
- Explicit strategies focused on the dietary needs and cultural backgrounds of asylum seeker and refugee communities will be considered to enhance legal compliance comprehensively.

Looked After Children:

- Officer support may benefit schools with looked after children, ensuring that their unique needs are addressed.
- Specialized support may be necessary to cater to the distinct needs of looked after children.
- Officer support for schools with looked after children is aligned with the Equality Act's duty to promote equal opportunities and eliminate discrimination.

Deprived or Disadvantaged Communities:

- Officer support for schools in deprived areas reflects an acknowledgment of the challenges faced by these communities.
- A holistic approach should be considered to address broader socio-economic factors impacting deprived or disadvantaged communities.
- Officer support for the most deprived areas aligns with the Equality Act's provisions on socio-economic status and the duty to eliminate discrimination.
- A holistic approach beyond school-specific measures should be explored to address systemic challenges faced by

			<p>deprived or disadvantaged communities.</p> <ul style="list-style-type: none"> • Online support provides accessibility for schools in rural areas. • Stakeholder interaction can help identify and address specific challenges related to rural isolation. • Equal access to the online portal and engagement with stakeholders for schools in rural areas aligns with the Equality Act's principles of accessibility.
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5- Action Plan and Recommendations			
Use this section to describe concerns further			
Produce a framework to outline how identified risks/concerns will be mitigated.			
What concerns were identified?	What action have you taken or planned?	Who is responsible for the action?	By when

6- Way forward	
How will the action plan and recommendations of this assessment be built into decision making and implementation of this proposal?	
How would you monitor the impact of your proposal?	

Sign off by DEG Chair/Director or Head of Services	
Review Date	