



<b>Title of Report:</b>	<b>Consultation on Healthy Futures</b>
<b>Committee Report Submitted To:</b>	<b>Environmental Services Committee</b>
<b>Date of Meeting:</b>	<b>12<sup>th</sup> March 2024</b>
<b>For Decision or For Information</b>	<b>For Decision</b>
<b>To be discussed In Committee</b>	<b>No</b>

<b>Linkage to Council Strategy (2021-25)</b>	
Strategic Theme	Healthy, Active and Engaged Communities
Outcome	Provide a consultation response
Lead Officer	Head of Health & Built Environment

<b>Budgetary Considerations</b>	
Cost of Proposal	N/A
Included in Current Year Estimates	N/A
Capital/Revenue	N/A
Code	N/A
Staffing Costs	N/A

<b>Legal Considerations</b>	
Input of Legal Services Required	<b>NO</b>
Legal Opinion Obtained	<b>NO</b>

<b>Screening Requirements</b>	Required for new or revised Policies, Plans, Strategies or Service Delivery Proposals.		
Section 75 Screening	Screening Completed:	Yes/No	Date:
	EQIA Required and Completed:	Yes/No	Date:
Rural Needs Assessment (RNA)	Screening Completed	Yes/No	Date:
	RNA Required and Completed:	Yes/No	Date:
Data Protection Impact Assessment (DPIA)	Screening Completed:	Yes/No	Date:
	DPIA Required and Completed:	Yes/No	Date:

## **1.0 Purpose of Report**

1.1 The purpose of this report is to provide a Causeway Coast and Glens Borough Council response to the consultation.

## **2.0 Background**

2.1 The Department of Health (DoH) has launched a consultation to seek views on the Healthy Futures strategic framework to prevent the harm caused by obesity and improve diets and levels of physical activity in Northern Ireland.

2.2 The new strategy aims to enhance health and wellbeing in Northern Ireland by focusing on improving diets, increasing participation in physical activity, addressing the obesogenic environment, and preventing the harm caused by overweight and obesity.

2.3 According to the Health Survey Northern Ireland, 65% of adults are classified as living with overweight or obesity. More men (71%) than women (60%) are living with overweight or obesity and rates are also higher in the most disadvantaged communities (68%) compared to the least disadvantaged (62%). Just over one in four children and young people in Northern Ireland are living with overweight (20%) or obesity (6%).

2.4 This strategy is set to replace the current A Fitter Future for All 2012-2022 strategic framework, which has shown good progress however has not met its overarching targets at the population level. The Department has based this new strategy on the learning from this, combined with a pre-consultation process, and further research including looking at what strategies have worked elsewhere.

2.5 The proposed vision of the strategy is 'To create the conditions in Northern Ireland which enable and support people to improve their diet and participate in more physical activity, and reduce the risk of related harm for those living with overweight and obesity.'

2.6 A range of principles have been proposed based on a whole system approach which is health led but not solely health owned, takes a life course approach and will focus on reducing food, physical activity and overweight and obesity related inequalities. The framework will be outcome based, focusing on four main long-term population level outcomes across the life course:

- Reducing the percentage of people in Northern Ireland who are living with overweight or obesity
- Improving the population's diet and nutrition
- Increasing the percentage of the population who participate in regular physical activity and
- Reducing the prevalence of overweight and obesity related Non-Communicable Diseases

2.6 The strategic framework is based on four proposed themes:

- Healthy Policies
- Healthy Places and Settings
- Healthy People and
- Collaboration and a Whole System Approach

2.7 The full consultation paper can be found at:

<https://www.health-ni.gov.uk/sites/default/files/publications/health/doh-cons-obesity-strategy-healthy-futures.pdf>

2.8 Attached as Appendix 1 is a suggested response to the consultation. The response has, in the main, been drafted from an Environmental Health perspective however comments from Leisure Services and Planning Service have been included.

2.9 The closing date for submission of responses was extended to 1<sup>st</sup> March 2024. Due to the time constraints this response has been submitted as an officer response pending endorsement and approval by Council.

### **3.0 Recommendation**

It is recommended that Council endorses the response.

## **Healthy Futures**

A Strategic Framework to Prevent the Harm caused by  
Obesity, and Improve Diets and Levels of Physical  
Activity in Northern Ireland

Consultation Questions

November 2023

## Overview

Consultation to seek views on Healthy Futures Strategic Framework to Prevent the Harm caused by Obesity, and Improve Diets and Levels of Physical Activity in Northern Ireland

**Consultation opened on Friday 24 November 2023.**

**Consultation closes on Friday 16 February 2024 at 17:00.**

## Summary

The Department of Health has worked with key stakeholders to co-produce a new strategic framework to reduce the harm related to living with overweight and obesity in Northern Ireland.

## Consultation Description

The new strategic framework for obesity – “**Healthy Futures**” – was issued for public consultation on 24 November 2023 and is available online at <https://www.health-ni.gov.uk/publications/consultation-obesity-strategy-healthy-futures>

## How to Respond:

You can respond online by accessing the consultation documents on the ‘Citizen Space’ web service and completing the online survey there. The online version can be accessed at <https://consultations2.nidirect.gov.uk/doh-1/healthy-futures-consultation-2023-2032/>.

To respond in writing, please email the Department at: [HDPB@health-ni.gov.uk](mailto:HDPB@health-ni.gov.uk) or write to:

Health Development Policy Branch  
Department of Health  
Room C4.22, Castle Buildings  
BELFAST BT4 3SQ

## **Next Steps**

Following this consultation, we will collate and analyse all views and inputs, and begin the process of developing the final strategy. This will need to be agreed by the Minister of Health and the NI Executive before being published. It is important to note that AFFFA – and all the structures that support action and collaboration – will remain in place until any new strategy is put in place.

**The Closing Date for responses is** Friday 16 February 2024 at 17:00

### Your details

**Name: Causeway Coast & Glens Borough Council**

**Email: environmentalhealth@causewaycoastandglens.gov.uk**

**Are you responding as an individual or organisation?**

Individual

Organisation

**Name of organisation if appropriate: Causeway Coast & Glens Borough Council**

## Screening

The strategic framework has been equality and rural screened to consider impacts on this important group. These documents are available at <https://www.health-ni.gov.uk/publications/obesity-strategy-2023-2033-rnia-and-eqia-0>.

### CONSULTATION QUESTION 1 – SCREENING:

**Have you any comments on either the Equality/Good Relations or Rural screening documents?**

Causeway Coast & Glens Borough Council (CCG) have no comments.

### CONSULTATION QUESTION 2 – SCREENING:

**Are there any areas or issues you feel we should be considering in future Equality/Good Relations or Rural screenings?**

CCG have no comments.

## Vision, Principles, Outcomes, Thematic approach

**CONSULTATION QUESTION 3 – VISION:** the overall vision for this new strategic framework is to *“create the conditions in Northern Ireland which enable and support people to improve their diet and participate in more physical activity, and reduce the risk of related harm for those living with overweight and obesity”*.

**Do you agree with this vision?**

Strongly agree  Agree:  Disagree:  Strongly disagree:

### Comments:

CCG agree with this vision.



**CONSULTATION QUESTION 4 – PRINCIPLES:** The project board proposed a range of principles for the development and implementation of the new strategic framework, these are: taking **whole system approach** with the framework being **health led but not solely health owned**, taking a **life course approach** and targeting or prioritising certain groups, focusing on reducing **inequalities**, acknowledging the **alignment with other policy areas** and not duplicating effort, being **outcome-based**, and that the framework will provide an **umbrella for actions to prevent and address overweight and obesity**.

**Do you agree with these principles?**

Strongly agree  Agree:  Disagree:  Strongly disagree:

**Comments:**

CCG agree with the principles and in particular feel it is useful for the strategy to be based on a whole system approach and to align to existing policy areas.

**CONSULTATION QUESTION 5 – OUTCOMES:** This strategic framework focuses on four main long-term population level outcomes across the life course: Reducing the percentage of people in Northern Ireland who are living with overweight and/or obesity; Improving the population's diet and nutrition; Increasing the percentage of the population who participate in regular physical activity; and Reducing the prevalence of overweight and obesity-related Non-Communicable Diseases (NCDs). **Do you agree with these 4 population level outcomes?**

Strongly agree:  Agree:  Disagree:  Strongly disagree:

**Comments:**

Whilst CCG support the broad outcomes identified in the strategy, the outcomes must be specific and measurable to demonstrate the success of strategy. For example, 'Improving the population's diet and nutrition' – is a complex area that may be difficult to assess. CCG would like to see specific indicators built into the strategy to measure these outcomes.

**CONSULTATION QUESTION 6 – THEMATIC APPROACH:** The strategic framework takes a thematic approach to the issues focusing on four key themes: Health Policies, Health Places, Healthy People, and Collaboration and A Whole System Approach. **Are all the key areas covered within this thematic approach?**

Yes:

No:

**Comments:** CCG believes that this is a useful approach however would like to highlight the Food Standards Agency's (FSA) Food You Can Trust Strategy 2022-2027 as a relevant strategy given that the FSA has specific policy responsibilities in relation to nutritional standards in Northern Ireland. CCG would be interested to understand how this could be rolled out on a practical level. CCG believes that legislation is a priority area and that training needs to be developed to support those taking this forward.

## Healthy Policies

**CONSULTATION QUESTION 7 – HEALTHY POLICIES:** Our ability to eat a healthy diet, participate in physical activity, and to maintain a weight that is good for our health, is very much influenced by the wider environment in which we live our lives. This theme focuses on the strategies, policies, regulations and stakeholders that control the wider food and physical environment, therefore playing a key role in addressing the obesogenic environment.

**Do you agree with this theme and what it is seeking to achieve?**

Strongly agree  Agree:  Disagree:  Strongly disagree:

**Comments:** CCG believes that affordability is key. In relation to physical activity this needs to be provided at accessible times (with a variety of am/pm, weekdays/weekends) and at accessible locations (with accessible public transport). CCG would also like to see recognition of the impact of social media and the associated excessive screen time and believes there should be more public campaigns to raise awareness and educate on these issues.

**CONSULTATION QUESTION 8 – HEALTHY POLICIES:**

**Do you agree with these priorities?**

Strongly agree:  Agree:  Disagree:  Strongly disagree:

**Comments: Food environment priorities**

CCG would wish to be further consulted on the detailed considerations given to how the marketing, advertising, and promotion of certain foods would be enforced, and, in particular, who the enforcing authority for this legislation would be. Whilst Environmental Health (EH) Departments in Councils currently enforce food safety and food standards legislation in establishments, this area of advertising and promotion is not included in our remit and therefore would have resource implications for District Councils.

**Comments: Food labelling and information priorities**

Whilst currently front of pack nutritional labelling is a voluntary scheme for manufacturers, EH Departments in Councils are the enforcing authority for ensuring that the information provided is accurate and not misleading to consumers. Given adequate resources there is an opportunity for Councils to promote the uptake of this scheme.

NI EH departments in Councils already promote calorie labelling at the point of purchase for food eaten out of the home, through the FSA Calorie Wise scheme. If legislation was brought in to mandate this provision, EH would need additional resources to educate, advise and ultimately enforce this legislation, should this remit falls to EH in Councils.

CCG would also comment that should such legislation be brought into NI that the type and scale of food businesses in the province is considered in order to make this a meaningful area for change. If such proposals followed the model in England, this may leave a large proportion of the food businesses in NI exempt, however this needs to be weighed up against the burden on small businesses to comply. As with other legislation, smaller businesses may therefore look to Councils for assistance with compliance.

**Comments: Healthier food options priorities**

CCG support the promotion of healthier food options however it is not clear how these priorities are to be taken forward and by which agencies. EH in Councils are already involved in the promotion of FSA Calorie Wise and MenuCal schemes. In addition, Councils in conjunction with the FSA, undertake a project each year where nutritional analysis is carried out on a specific food type and through this research, guidance is given to caterers/manufacturers on how to make that offering healthier, including advice on portion size and reformulation. This is then promoted by EH on an ongoing basis. This area of work could be extended in scope and reach if there were targeted resources available to EH in Councils.

CCG believes that affordability of healthier food options is key but that the trend in increasing food costs generally is a big challenge. CCG believes that staple basic foods should be affordable for all and that the price of these goods should be capped and subsidised by alternative funding sources.

**Comments: Physical activity and active travel priorities**

CCG believes that physical activities should be affordable and cost effective and be made available in suitable locations. Rural communities are at a disadvantage as have limited access to safe routes. A programme of activities should be made available across all locality areas and should be tailored to suit all needs, e.g. those with disabilities, older people, pre-natal, post-natal etc.

**CONSULTATION QUESTION 9 – HEALTHY POLICIES:**

**Is there anything missing that is likely to have a positive impact on this theme and what it is trying to achieve?**

**Comments:**

CCG considers affordability and accessibility to be key in delivering this theme.

## Healthy Places

**CONSULTATION QUESTION 10 – HEALTHY PLACES:** At all ages, we can spend a significant portion of our lives in places and settings that influence our ability or inability to eat healthily, be physically active and to manage our weight. This can be through a lack of access to opportunities, barriers to participation and lack of availability. However, settings can also play a positive role in supporting the health and wellbeing of the people who access them. This theme focuses on creating supportive places and settings.

**Do you agree with this theme and what it is seeking to achieve?**

Strongly agree:  Agree:  Disagree:  Strongly disagree:

**Comments:**

CCG feels there should be funding available to support and implement positive changes in these settings and suggests standards could be set, e.g. Gold, Silver & Bronze awards, for these settings to work towards.

**CONSULTATION QUESTION 11 – HEALTHY PLACES:**

**Do you agree with these priorities?**

Strongly agree:  Agree:  Disagree:  Strongly disagree:

**Comments: Early years settings priorities**

CCG believes that funding for Early Years is a priority and that healthy breaks should be promoted (e.g. free fruit breaks)

**Comments: School settings priorities**

CCG feels that healthy school meals should be prioritised and promoted.

**Comments: College, university, and workplace settings priorities**

Councils currently promote and assess Calorie Wise in these settings.

**Comments: Healthcare settings priorities**

Councils currently promote and assess Calorie Wise in these settings with a number of Trust facilities currently holding the Calorie Wise Award.

**Comments: Local government and community settings priorities**

Councils currently promote and assess Calorie Wise in these settings.  
CCG are currently assisting their Council colleagues to deliver the Nutritional Standards in Council Catering.

**CONSULTATION QUESTION – 12: HEALTHY PLACES:**

**Is there anything missing that is likely to have a positive impact on this theme and what it is trying to achieve?**

**Comments:**

CCG feel that collaboration with key partners is essential to implement effective change. This collaborative working allows for the best use of all available expertise.

Again CCG suggests standards could be set, e.g. Gold, Silver & Bronze awards, for these settings to work towards

**Healthy People**

**CONSULTATION QUESTION 13 – HEALTHY PEOPLE:** As well as amending the wider policy and legislative environment and ensuring that a range of settings support people to be healthy, this theme therefore focuses on the need to help, support, and enable people to prevent poor health and wellbeing, to provide early interventions for those who may need additional help, and to provide appropriate treatment and interventions which seek to reduce the harm to those who may be living with overweight and obesity.

**Do you agree with this theme and what it is seeking to achieve?**

Strongly agree:  Agree:  Disagree:  Strongly disagree:

**Comments:**

CCG considers it important for the longevity of support for the programme to be fully considered at the planning stage.

**CONSULTATION QUESTION 14 – HEALTHY PEOPLE:**

**Do you agree with these priorities?**

Strongly agree:  Agree:  Disagree:  Strongly disagree:

**Comments: Pregnancy and early years priorities**

CCG would comment that there is currently no structured post pregnancy support programme for women who have a high BMI.

**Comments: Prevention and awareness programmes priorities**

CCG would like to recognise the importance of prevention awareness programmes using the current Health Coaching model such as the Diabetes Prevention Programme (based on behaviour change approach) which builds healthy habits and long-term health benefits.

**Comments: Weight management services priorities**

CCG believes that access to support should be available at an earlier stage, not when obesity is at a crisis point. The Physical Activity Referral Scheme (PARS) programme is available, but this needs to be inclusive of all BMI's with specialised support available.

**CONSULTATION QUESTION 15 – HEALTHY PEOPLE:**

**Is there anything missing that is likely to have a positive impact on this theme and what it is trying to achieve?**

**Comments:**

CCG is of the opinion that the key focus should be on prevention and not treatment and that if adequate funding is available at the prevention stage this will save money in the long term. Funding should also be longer term to enable the benefits to be realised.

CCG believes that there needs to be a robust evaluation process examining both data and qualitative feedback.

## Collaboration and Whole System Approach

### CONSULTATION QUESTION 16 – Collaboration and a Whole System

**Approach:** Overweight and obesity is complex and interrelated with other issues and outcomes. It is vital therefore that this strategic framework is a living document which is regularly updated in line with the latest international research and evidence, that we work collectively across the UK and Ireland, and that we enable people to come together to find solutions and take a systematic approach to achieving our goals.

**Do you agree with this theme and what it is seeking to achieve?**

Strongly agree:  Agree:  Disagree:  Strongly disagree:

#### **Comments:**

CCG are in support of this theme however Council would like to see clear lines of accountability for all partners and an overarching framework to co-ordinate and ensure priorities are progressed.

CCG would like to see funding to support capacity and would welcome models of good practice e.g. Henry, Health Coaching.

CCG would like to see recognition of the mental health outcomes of obesity prevention.

### CONSULTATION QUESTION 17 – Collaboration and a Whole System

**Approach: Do you agree with these priorities?**

Strongly agree:  Agree:  Disagree:  Strongly disagree:

#### **Comments: Whole System Approach and collaboration priorities**

CCG would welcome a commitment to working together with other agencies to collaboratively work on shared goals. CCG would like to see legislation where appropriate which is adequately resourced so that outcomes can be delivered.



**CONSULTATION QUESTION 18 – Collaboration and a Whole System**

**Approach: Is there anything missing that is likely to have a positive impact on this theme and what it is trying to achieve?**

**Comments:**

CCG would seek that adequate resources are available to enable effective partnership working to deliver on this strategy and that robust evaluation is carried out at all stages.

**CONSULTATION QUESTION 19 – Final Comments:**

**Have you any other comments you wish to make at this stage?**

**Comments:**

CCG supports this Strategic Framework and EH in Councils are already contributing to this agenda along with a wide range of other services. At a time where budgets are particularly challenging, EH will ultimately be driven by their statutory functions and priority will always be given to delivering against these targets over other areas of work. CCG note that there are several priority areas identified in this strategy where the introduction of legislation is being considered and in some cases enforcement for this may fall to EH. This will require additional resources for EH Departments to take on these extra duties including the upskilling of staff to this new area of work. Even where these themes are not legislative, or where EH are not the enforcing authority, food businesses will look to their EH Officers for support, advice, and guidance. EH Officers are in a unique position in this regard as they are known to the food businesses and are already a trusted source of advice, particularly in relation to food.

In summary, CCG are willing to contribute to this strategy, however our impact will be limited without adequate ringfenced resources and, where applicable, a solid regulatory framework.

Discussions with DfI Planning will be vital in relation to any proposals relating to this strategy that would have implications for the planning system.

**Thank you**

Thank you for completing the consultation. We are keen to hear a wide range of views and ideas to make our new strategy, and proposed interventions, even better targeted at the factors that will make the most positive difference.

You may also be interested in the Department's consultation on a Proposed Regional Obesity Management Service (ROMS) for Northern Ireland which is running at the same time as this consultation. Details are available online at <https://www.health-ni.gov.uk/consultations/proposed-regional-obesity-management-service-roms-northern-ireland>.