

## **Review of National Outcomes call for evidence Scottish Government consultation**

### **Response from Obesity Action Scotland Closing date: 12 June 2023**

Obesity Action Scotland welcomes the opportunity to contribute to the call for evidence for the Review of National Outcomes.

In our response below, we will comment on each National Outcome of relevance to our work, outlining our views on the outcome, its vision, and associated indicators, and highlight things we feel are not covered sufficiently and which require a new or amended indicator. We understand the National Outcomes and indicators are reviewed every 5 years, and will set the direction of travel for Government policy over the next 5 years.

Obesity Action Scotland is a member of the NCD Alliance Scotland. We support the calls and recommendations from the Alliance in their submission.

#### ***Outcome: Children and Young People – We grow up loved, safe and respected so that we realise our full potential***

The outcome should be updated to include healthy. Children and young people have a right to grow up healthy and this should be explicit/enshrined within national outcomes. In order for children and young people to realise their full potential, they need to be healthy. This is also essential for achievement of central aspects of the vision and many, if not all, of the associated indicators.

The updated outcome should be: *Children and Young People – We grow up healthy, loved, safe and respected so that we can realise our full potential.*

#### Vision

The vision for this outcome states it will deliver a childhood ‘free from abuse, tobacco, alcohol, drugs, poverty and hunger’. We note unhealthy food high in fat, salt and sugar (HFSS) is not mentioned here and this a significant omission, particularly given the harm that this food does to children’s health and their weight outcomes. Protecting children from unhealthy food should be considered the same as protecting them from tobacco and alcohol, with the three collectively seen as health harming commodities. It is of course welcome that the vision mentions addressing hunger, which we support.

There is a large amount of data and evidence available which shows that children and young people who are exposed to advertising and promotions of unhealthy HFSS products are more likely to be at risk of obesity in childhood<sup>1</sup>, and also to have obesity as adults.

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<sup>1</sup> Coleman P.C et al (2022) A rapid review of the evidence for children’s TV and online advertisement restrictions to fight obesity. Preventative Medicine Reports: 28;26:101717. doi: 10.1016/j.pmedr.2022.101717. PMID: 35141122; PMCID: PMC8814640.

The National Performance Framework, which the National Outcomes are part of, should contribute to and help facilitate the achievement of policy commitments in other areas. In 2018, in both their Diet and Healthy Weight Delivery Plan<sup>2</sup> and Programme for Government<sup>3</sup>, the Scottish Government announced an ambition to halve childhood obesity by 2030 and tackle diet related inequalities. The outcomes and indicators within the National Outcomes, particularly those focused on children and young people, are a key component of achieving this ambition. Therefore, not including unhealthy HFSS food in the vision of the children and young people outcome is a significant omission which needs to be corrected. In this regard, we would also like to see an additional indicator on child healthy weight, which we discuss in more detail below.

#### Current indicator: Healthy start

We note this indicator measures rates of perinatal mortality. However, we feel use of the term healthy start as the title of this indicator is inappropriate, as healthy start is usually used to refer to health and wellbeing outcomes in infancy and the early years, beyond mortality.

We would like to see this indicator renamed, if the focus is to remain solely on perinatal mortality. If it is to remain as healthy start, the indicator should include other measures such as overall health in infancy and the early years, to more appropriately reflect use of the term healthy start.

#### Proposed additional indicator: Child healthy weight

We would like to propose the creation of an additional indicator under the children and young people outcome on **child healthy weight**. This information is currently recorded under the healthy weight indicator, which sits under the health outcome. We feel it would be more appropriate to have child healthy weight listed as a separate indicator from adult healthy weight. Having separate indicators would make it easier to monitor progress in achieving the indicator(s) for adults and children. It would also recognise the commitment by the Scottish Government to halve childhood obesity which it committed to in the 2018/19 Programme for Government<sup>4</sup> and features prominently in the Scottish Government's Diet and Healthy Weight Delivery Plan. Having a separate indicator could act as a further catalyst for achieving this commitment and recognises the important role that obesity prevention, particularly in the early years, plays.

In addition, the indicator on child healthy weight should also use further appropriate data sources, not just the Scottish Health Survey. This could provide a more comprehensive picture of child weight in Scotland. The Primary 1 BMI data, reported by Public Health Scotland, provides longer-term and more accurate data on child weight in Scotland.

Finally, as part of the indicator, we would also like to see the Child Measurement Programme, through which the Primary 1 BMI data is collected, extended to also measure children in primary 7. Such measurements are carried out at equivalent stages in England (reception and year 6). Expanding the measurement programme in such a way would provide a more comprehensive picture of child weight on Scotland, monitoring weight changes at a population level over a number of years.

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<sup>2</sup> Scottish Government (2018) A healthier future – Scotland's Diet & Healthy Weight Delivery Plan  
<https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2018/07/healthier-future-scotlands-diet-healthy-weight-delivery-plan/documents/00537708-pdf/00537708-pdf/govscot%3Adocument/00537708.pdf>

<sup>3</sup> Scottish Government (2018) Delivery for Today, Investing for Tomorrow. The Government's Programme for Scotland 2018-19  
<https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2018/09/delivering-today-investing-tomorrow-governments-programme-scotland-2018-19/documents/00539972-pdf/00539972-pdf/govscot%3Adocument/00539972.pdf>

<sup>4</sup> Scottish Government (2018) Delivery for Today, Investing for Tomorrow. The Government's Programme for Scotland 2018-19  
<https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2018/09/delivering-today-investing-tomorrow-governments-programme-scotland-2018-19/documents/00539972-pdf/00539972-pdf/govscot%3Adocument/00539972.pdf>

Such indicators exist in England as part of the UK Government's Public Health Outcomes Framework. The Framework contains two separate indicators on prevalence of overweight (including obesity) in children (Indicators C09a & C09b)<sup>5</sup> – children in reception year (age 4-5, equivalent to Primary 1 in Scotland) and children in year 6 (age 10-11, equivalent to Primary 7 in Scotland). We would like to see similar indicators replicated in Scotland as part of the National Outcomes.

#### Proposed additional indicator: Free school meals

Another additional indicator we would like to see under the children and young people outcome is the proportion of children taking up free school meals. Such a measure is crucial for delivering on the vision of the outcome to ensure children are free from hunger, and it would also contribute to achieving the ambition to halve childhood obesity by 2030. Currently, all pupils in primaries 1-5 in Scotland are eligible for free school meals, and it was recently confirmed by the Scottish Government that the planned extension of this to all pupils in primaries 6 & 7 is going ahead and will be delivered by 2024. Given this commitment, it is important that school meal uptake is maximised and also measured and recorded. Including it as an indicator within the National Outcomes ensures it will be measured and reported on over to time.

Free school meals should be used to provide high, quality nutritious food options to all children. Evidence from England has demonstrated that school meals can offer a stronger balance of nutrients compared to packed lunches<sup>6</sup>, and are effective at improving healthy weight outcomes in children<sup>7</sup>.

In terms of measurement, the indicator could measure the proportion of children in each primary school year who take up the free school meal offered in each local authority area. The data used to measure this could be gathered from each local authority, who are responsible for providing the school meals, by asking them to record and report the number and/or proportion of primary pupils who have a school meal every day.

#### Proposed additional indicator: Maternal weight

We note there is no mention of weight of pregnant women within the outcome, which is a significant omission. We would like to propose the inclusion of an additional indicator on maternal weight in early pregnancy.

Ensuring maternal healthy weight at the start of pregnancy can give the best start to children. Having an indicator on this within the National Outcomes would allow us to focus resources on giving children and mothers pre-conception the best possible start, supporting their current and future health and wellbeing. The latest data shows that just under 57% (56.9%) of pregnant women in Scotland are recorded as being overweight or having obesity, the highest figure on record, and that this was common across all age groups and levels of deprivation<sup>8</sup>, which demonstrates that much more needs to be done to support and value the health of babies and their mothers during pregnancy. A commitment to a national indicator would be an important step in recognising this.

Data on maternal weight is currently recorded in the annual Births in Scotland report, and this data could be used as the basis for the indicator. This data is gathered at a woman's first antenatal booking appointment, with their height and weight measured and BMI calculated by a healthcare professional.

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<sup>5</sup><https://fingertips.phe.org.uk/documents/Public%20Health%20Outcomes%20Framework%20at%20a%20glance%20-%20England%20May%202023.html>

<sup>6</sup> Haney, E et al (2023). Dietary quality of school meals and packed lunches: A national study of primary and secondary schoolchildren in the UK. *Public Health Nutrition*, 26(2), 425-436. doi:10.1017/S1368980022001355

<sup>7</sup> Holford, A and Rabe, B (2022) Going universal. The impact of free school lunches on child body weight outcomes. *Journal of Public Economics Plus*, Volume 3, 100016 <https://doi.org/10.1016/j.pubecp.2022.100016>

<sup>8</sup> Public Health Scotland (2022) Births in Scotland. Year ending 31<sup>st</sup> March 2022 <https://www.publichealthscotland.scot/publications/births-in-scotland/births-in-scotland-year-ending-31-march-2022/>

Obesity in early pregnancy is an indicator (Indicator C03a) included in the UK Government's Public Health Outcomes Framework<sup>9</sup>, demonstrating it has been done elsewhere.

Given that the necessary data already exists and is widely reported, it would be very easy to include this as an indicator under this outcome in the National Outcomes, as it wouldn't require any new or additional data to be collected. Including maternal weight as an indicator would provide an important measure of child health and weight in Scotland, and would demonstrate that as a country we value the health of both our children and their mothers during pregnancy.

Inclusion of this additional indicator would also link to and support the achievement of other current and proposed indicators within the children and young people Outcome.

***Outcome: Communities – we live in communities that are inclusive, empowered, resilient, and safe***

The outcome should be updated to include healthy. In order for communities to be inclusive, empowered, resilient and safe, everyone in those communities needs to be healthy and the community itself also needs to be health promoting and health sustaining. The places and spaces we live in, visit and use every day have a profound impact on our health and wellbeing. Updating the outcome to include health would also align the outcome with its vision, which recognises the importance of places we live in for health and happiness. We discuss this in more detail below, with regards to a proposed additional indicator, focused on the Place Standard Tool.

The updated outcome should be: *Communities - we live in communities that are healthy, inclusive, empowered, resilient and safe.*

Proposed additional indicator: Using the Place Standard Tool to deliver healthy places and communities

The vision for the communities outcome outlines a recognition of the importance of the places we live in for our health and happiness, which is welcome. As part of this, we would like to see greater recognition of the role of the Place Standard Tool in achieving this vision.

The Place Standard Tool<sup>10</sup> is not currently embedded within the National Outcomes and National Performance Framework, and its use is not a requirement when planning and designing new places. We would like to see the Tool formalised within the National Outcomes so that use of the Tool becomes a requirement in creating places which support our health and happiness. Formally embedding it in this way ensures linkages between different Scottish Government Frameworks and Strategies are made, and avoids unnecessary duplication.

An updated version of the Tool was published in November 2022, and for the first-time healthy food is explicitly mentioned in it. By explicitly including provision of healthy food as one of the things to consider when discussing local facilities and services in their place, it encourages local communities to think about their local food environment. An issue is much more likely to be discussed and considered when it is explicitly listed, and this in turn is more likely to result in impetus for and possibly influence change. It is also a positive recognition of the importance of the food environment in determining the quality of places.

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<sup>9</sup><https://fingertips.phe.org.uk/documents/Public%20Health%20Outcomes%20Framework%20at%20a%20glance%20-%20England%20May%202023.html>

<sup>10</sup> Public Health Scotland (2022) Place Standard Tool. How Good is Our Place? <https://www.ourplace.scot/sites/default/files/2022-11/Our%20Place%20Place%20Standard%20Tool%20final%20version%20-%20Print%2C%20Interactive%20and%20booklet%20details%20-%20Oct%202022.pdf>

Therefore, we would like to see an indicator which monitors the use of the Place Standard Tool in the planning system and also importantly monitors how the priorities identified are translated into action through the planning system to deliver healthy places and spaces. The indicator should set a requirement for the Tool to be used when considering all planning applications. This could then be monitored and measured, with local authorities required to record and report this data.

Overtime, as the National Planning Framework 4 becomes more embedded, this indicator can be used to embed health as a focus within the planning system, and can be updated and amended overtime as this change occurs.

***Outcome: Economy – We have a globally competitive, entrepreneurial, inclusive and sustainable economy***

Outcome Vision

We note there is no mention of health in the vision for this outcome. This is a significant omission which should be addressed. Population health and economic performance are inextricably linked – a healthy working population drives healthy economic performance and equally, an unhealthy workforce drives poor(er) economic performance. The costs of population ill-health to society and the economy are huge. For example, a recently published report has calculated the cost of adult obesity to the UK economy to be £58 million each year<sup>11</sup>, with an estimated annual cost of £600 million alone to the NHS in Scotland<sup>12</sup>.

Current indicator: Economic growth

The Scottish Government has committed to delivering a wellbeing economy in Scotland and there is now a Cabinet Minister with responsibility for the wellbeing economy. Further, the Scottish Government have developed the Wellbeing Economy Monitor, which has 14 measures focused on the areas of human, natural, social, and produced and financial capital, and includes measures on inequality, preventable deaths and poverty<sup>13</sup>. Given these developments and commitments, the wellbeing economy now needs to be reflected in our National Outcomes. Measuring economic growth and overall economic performance by GDP alone is no longer appropriate.

In terms of measurement of an updated indicator, the 14 measures outlined in the Wellbeing Economy Monitor should be the initial basis for this. These can be then reviewed and updated overtime to ensure they remain relevant.

The outcomes we have suggested earlier in our consultation response reflect the fact that action to achieve healthy weight is crucial to delivering economic success. Obesity is impacting on the productivity of our workforce and therefore our economy and we must take the steps necessary to improve population health and recognise its link to ensuring a healthy, active workforce.

***Outcome: Environment – We value, enjoy, protect and enhance our environment***

Vision

We note there is no mention of food in the vision for the environment outcome, whilst many other contributors to greenhouse gas emissions are listed, and we feel this is a significant omission. The

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<sup>11</sup> Frontier Economics (2022) Estimating the full costs of obesity <https://www.frontier-economics.com/media/5094/the-full-cost-of-obesity-in-the-uk.pdf>

<sup>12</sup> Butland B, Jebb S, Kopelman P, et al (2007) Foresight. Tackling obesities: Future choices - project report. 2nd edition

<sup>13</sup> Scottish Government (2022) The Wellbeing Economy Monitor – December 2022 update <https://www.gov.scot/binaries/content/documents/govscot/publications/research-and-analysis/2022/12/wellbeing-economy-monitor-december-2022-update/documents/wellbeing-economy-monitor-december-2022-update/wellbeing-economy-monitor-december-2022-update/govscot%3Adocument/wellbeing-economy-monitor-december-2022-update.pdf>

food system as a whole is a significant source of greenhouse gas emissions in Scotland, accounting for around a third of all emissions<sup>14</sup>. We would like to see this reflected in the Vision.

Delivering a food system with lower greenhouse gas emissions not only benefits planetary health but also human health and wellbeing.

### ***Outcome: Health – We are healthy and active***

#### Vision

We note the vision for the health outcome outlines a number of commitments with regards to improving health including: prioritising affordable, healthy food and local food production; that the Government will have addressed the availability of unhealthy food options; are combatting food and drink industry facilitation of ill-health; and implement a whole systems approach. It is welcome that these priorities are included in the vision, as they emphasise how important it is to take action to address these issues. However, if this vision is to be achieved over the next five years, it needs to be clear what actions will be taken and how they will be measured. The current indicators within the outcome are not appropriate for this purpose. It is unclear within the current indicators how these commitments in the vision would be measured, and the indicators need to be updated accordingly. We discuss below what changes and updates we would like to see made to the indicators.

With regards to combatting food and drink industry facilitation of ill health, it is welcome this is included in the vision and that there is a commitment to address it. However, we would like to see this go further to also include reference to the commercial determinants of health, to recognise the contribution of other industries, like alcohol and tobacco, and their role in facilitating ill-health.

We need to see actions and commitments delivered to prioritise the vision including delivery of regulations to address price and location promotions of products in high in fat, salt and sugar, achieving the ambition to halve childhood obesity prevalence by 2030 and prioritising action on commitments in the Diet and Healthy Weight Delivery Plan, and delivering on commitments with the Out of Home Action Plan as well as strengthening it to make the measures statutory rather than voluntary for industry.

The vision needs to be updated accordingly to reflect the current situation with regards to these areas. The vision and National Outcomes set the direction of travel for the Scottish Government and determine what policy decisions are taken. It is therefore important that they are accurate, relevant and reflective of current circumstances.

#### Current indicator: Healthy life expectancy

It is welcome this indicator is included and should be retained. Healthy life expectancy provides a more accurate reflection of overall whole population health than just simply life expectancy. To further enhance/strengthen the indicator, it would be helpful to explore additional ways in which the information can be broken down and reported, such as by race/racial identity for example, in addition to the current breakdown by SIMD and sex that is currently provided.

#### Current indicator: Healthy weight

As previously discussed in the children and young people outcome, we would like to see separate indicators for adult and child healthy weight. Separating these out into two separate indicators gives greater attention to each and recognises the nuances and differences with regards to weight outcomes in each group. Nevertheless, it is important that monitoring of the indicators is linked, as evidence shows that childhood is a critical stage with children at risk of obesity in childhood much

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<sup>14</sup> [https://www.foodcoalition.scot/uploads/6/2/6/8/62689573/sfc\\_discussion\\_series\\_-\\_food\\_and\\_environment\\_1\\_.pdf](https://www.foodcoalition.scot/uploads/6/2/6/8/62689573/sfc_discussion_series_-_food_and_environment_1_.pdf)

more likely to have obesity as adults<sup>15</sup>, and once they have obesity, it is much more challenging for them to return to a healthy weight<sup>16</sup>. Monitoring child and adult healthy weight separately would enable greater identification of the trajectory of weight outcomes from childhood to adulthood, and help to identify the most appropriate life stages where interventions and preventative policies will likely be most effective.

Further, although the indicator is healthy weight, it would be useful and should be updated to include information/monitoring around non-healthy weight. By only reporting on healthy weight, it is not clear how the remainder of the non-healthy weight is split between overweight, obesity, severe obesity and underweight. Including the breakdown of the statistics by each category would make it easier to see and understand this information at a glance. This information is already gathered and recorded in the Scottish Health Survey and is currently reported by BMI classification categories, so could be easily integrated into the indicator. It would not require any additional data collection.

The indicator should also be updated to report by additional characteristics, in particular by race. Reporting by race/racial identity is currently lacking in the Scottish Health Survey and this is an area where the indicator could be strengthened in relation to healthy weight. Having this information would make a significant contribution to enhancing the evidence base and would facilitate the development of more nuanced policy positions and decisions.

#### Current indicator: Physical activity

We support and welcome that physical activity is included in the National Outcomes and would like to see it retained as an indicator. The National Outcomes should recognise the importance of physical activity for physical and mental wellbeing.

Currently, the physical activity indicator in the Health National Outcome only measures adult physical activity. This is an omission with needs to be addressed. Evidence shows that physical activity in children is important. It is therefore crucial that it is captured and recorded in the indicator. Rates of child physical activity are already recorded in the Scottish Health Survey and could therefore be easily incorporated into an indicator – there wouldn't be a requirement for the collection of new data. Further, including children's physical activity in the indicator, with a focus on improving physical and mental wellbeing, would help with delivery of other indicators and Outcomes.

#### ***Outcome: Poverty – We tackle poverty by sharing opportunities, wealth and power more equally***

#### Current indicator: Cost of living

The indicator refers to the percentage of net income spent on fuel, food and housing. Collating these three items together into one measurement masks significant differences between the different elements. It is welcome that food is included as part of this calculation. However, we would like to see these three elements separated out to be calculated individually, to provide a more accurate reflection of the contribution of each of these elements to the cost of living.

Food is one of the main contributory elements to the rising cost of living. For example, there is a significant difference between rate of inflation of food prices and the overall current rate of inflation. The latest data from April 2023 shows that food prices rose at a rate of almost two times the overall rate of inflation - 19.1%, compared to an overall inflation rate of 10.1%<sup>17</sup>. Not only that, within the overall rise, it is healthier and staple food products, like eggs, some fruit and vegetables,

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<sup>15</sup> <https://www.obesityactionsotland.org/healthy-weight-data-info/healthy-weight-in-scotland/children-and-young-people/>

<sup>16</sup> <https://www.ncbi.nlm.nih.gov/books/NBK570613/>

<sup>17</sup> Food Foundation Food Prices Tracker April 2023 - <https://foodfoundation.org.uk/news/food-prices-tracker-april-2023>

and milk that have seen the biggest rises, with prices of unhealthy discretionary products rising much less sharply. Further, there are also significant inequalities experienced between population groups with regards to the proportion of disposable income spent on food. The most deprived 20% of the population are required to spend 47% of their disposable income on food to meet the Eatwell guidance for a healthy diet, compared to only 11% for the least deprived fifth<sup>18</sup>. These nuances and differences are currently masked by the current measurement within the indicator. The indicator therefore needs to be updated to include a separate measure of each of the three items and specifically for food – a measure of the cost of healthy compared unhealthy food, and the percentage of disposable income spent on food by different population groups.

As has been discussed, the rising cost of food will have an impact on the food individuals can afford to purchase and eat, with a resulting impact on health. When costs rise, food is one of only a few areas of household budgets that is or can be flexible, in line with other fixed costs, such as housing and energy costs, and so this is usually one of the first places where cuts in spending are made, with often significant impacts on health. Therefore, measuring and accounting for this within the national indicators and outcomes is critical. Furthermore, this indicator will have an impact on the achievement of other indicators and outcomes, including health, healthy weight, and children and young people.

#### Current indicator: Food insecurity

The indicator reports on the proportion of adults who have indicated they are worried that they would run out of food. It is welcome this indicator is included as access to food is an important measure of dietary outcomes.

We would like to see the indicator expanded to measure food insecurity in more depth, specifically what proportion of adults have insecure access to healthy food. This is linked to the cost of living indicator discussed previously.

#### **About us**

Obesity Action Scotland provide clinical leadership and independent advocacy on preventing and reducing overweight and obesity in Scotland.

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<sup>18</sup> Food Foundation (2022) The Broken Plate 2022. The State of the Nation's Food System  
[https://foodfoundation.org.uk/sites/default/files/2023-01/FF\\_Broken\\_Plate\\_Report%202022\\_DIGITAL\\_UPDATED\\_2023.pdf](https://foodfoundation.org.uk/sites/default/files/2023-01/FF_Broken_Plate_Report%202022_DIGITAL_UPDATED_2023.pdf)