

# Creating a Healthy Food Economy: A Policy Audit Tool for Local Authorities



Prepared by the Food Foundation in conjunction with Birmingham Public Health

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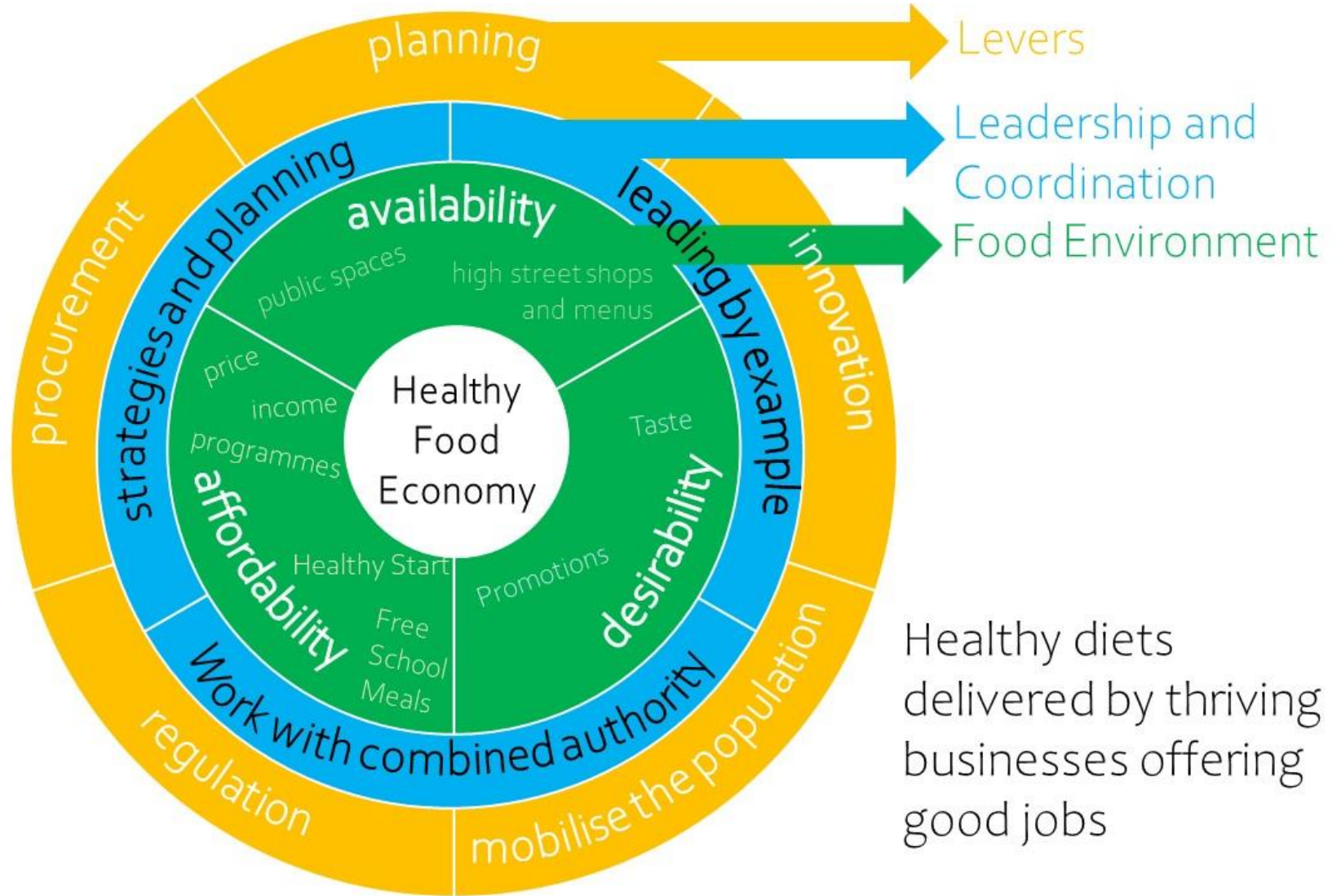
## Introduction

Improving the food environment and reducing risk of diet related ill-health will help councils to fulfil their statutory duties as laid out in the *Health and Social Care Act 2012*. All local authorities in England have a duty to “take appropriate steps to improve the health of people who live in their areas,” which can include “providing assistance to help individuals minimise risks to health arising from their accommodation or environment.”<sup>(1)</sup> The food environment is a driving factor in poor diets, obesity and diet-related diseases <sup>(2,3)</sup>, and taking steps to create a healthy food economy will help minimise the risk for citizens.

This report presents an audit tool the Food Foundation created for Birmingham Public Health on the extent to which their existing policies and programmes are creating a healthy food economy in the city. Based on existing evidence we created a conceptual framework showing the outcomes and policy outputs needed for a Birmingham to have a ‘Healthy Food Economy’ and then used this framework to create an audit tool. To complete the audit, we interviewed 18 officials in Birmingham City Council and in a variety of other agencies and settings that have oversight and leadership on the food environment across the city and conducted a desk review of published documents and policies.

The audit tool allows local areas to assess where they are making progress on food policy and where further action is needed. Completing the audit can be the first step towards creating a new food policy or strategy or could be completed at any time Local Authorities need to review their progress.

# Conceptual Framework



## Creating the Audit Tool

We've defined a healthy food economy as one in which healthy diets are being delivered by thriving businesses offering good jobs. In practice, this means an economic environment where healthy food is in greater supply and demand, and unhealthy food is in decline.

### Literature Review and Conceptual Framework

We conducted a literature review in May 2019 to identify the latest guidance material on local food policy actions; physical activity was not within the scope of this audit. To develop the conceptual framework, we drew on guidance from Public Health England, Sustainable Food Cities, Town and Country Planning Association, the Greater London Authority, and The King's Fund.(1–6) From this review, we identified policies and policy levers that would be available to Birmingham in their endeavours to create a healthy food economy and considered the outcomes which needed to change to indicate progress towards this goal.

The literature review also identified a framework from The King's Fund on the role of city governments in population health, which we used as the basis for the conceptual framework for this audit. The King's Fund framework identifies five roles that city governments are "well placed to play...in relation to population health." These are: coordinating system wide action, promoting innovation, using regulatory and legislative levers, mobilising the population and using planning powers to create healthy places (5).

To adapt the King's Fund framework to focus specifically on food policy, we mapped the policies and policy levers identified in the literature review against the categories in the King's Fund framework. We also considered the working relationship that local areas have with their regional or combined authorities.

We centred the framework around the conditions (outcomes) that a healthy food economy would hope to deliver, namely that healthy food is available, affordable and desirable, while supporting businesses in the city.

To complement the conceptual framework, we refer local authorities and cities to existing policy documents and pacts, notably the Sustainable Food Cities' *Good Policy for Good Food* toolkit and the Milan Urban Food Policy Pact (2,7). The Milan Pact focuses on six categories – governance, sustainable diets and nutrition, social and economic equity, food production, food supply and distribution and food waste – and the signatories to the Pact provide useful examples of how to implement food policy from cities around the world.

### Audit Tool

We used the conceptual framework to develop a simple audit tool to guide an investigation into which policies are in place and which could be developed. This audit tool is directly derived from the conceptual framework and the policy levers that would be available to local areas, as identified in the literature review (described above). We grouped the identified policy levers into the categories of actions laid out in the King's Fund model and into sub-categories or topics that emerged from the literature review.



Healthy Food Economy: Healthy diets delivered by thriving businesses offering good jobs			
	Heading	Sub-Headings	Example Policy Actions
Leadership and Coordination	Strategies and Plans	Establish a local food council/commission/coordinating group/task force	<ul style="list-style-type: none"> <li>- Adopt a city or authority-wide food plan</li> <li>- Adopt Local Authority Declaration on Healthy Weight or Local Government Declaration on Sugar Reduction and Healthier Food</li> <li>- Sign up to relevant international and national campaigns and pacts (e.g. Milan Urban Food Policy Pact, Sustainable Food Cities, Peas Please, etc)</li> <li>- Sign up to UNICEF UK Baby Friendly Initiative</li> <li>- Adopt a city-wide environmental sustainability action plan that includes food</li> </ul>
		Develop a food plan/food poverty action plan	
	Include healthy food access and food poverty in other strategies/ plans		
	Leading by Example	Adopt policies and procedures in council/authority owned and operated settings to lead by example	<ul style="list-style-type: none"> <li>- Visible political leadership on food policy from elected officials</li> <li>- Advertising restrictions on estates/locations owned or operated by Council/authority</li> <li>- Support women returning to work at the City Council to breastfeed, express and store breastmilk</li> <li>- Implement the (real) living wage for all staff/contractors</li> <li>- Healthy food in their canteens</li> </ul>
	Working with combined authority	Work in partnership with combined authority in areas that they have authority over	<ul style="list-style-type: none"> <li>- Will depend on the local agreements in place. Could cover, for example, advertising restrictions on the transport network</li> </ul>
Levers for Change	Planning	Planning restrictions on unhealthy food takeaways  Local food production  Planning protects healthy food shops and markets  Establish a network of water fountains/fill points	<ul style="list-style-type: none"> <li>- Create a health/sustainability checklist for planning applications</li> <li>- Supplementary Planning Documents restrict development of hot food takeaways</li> <li>- Section 106 agreements to require financial contribution from hot food takeaways to support obesity programmes</li> <li>- Specify food shops as 'essential retail' in the Local Plan to restrict change of use applications</li> <li>- License/control street trading of unhealthy food</li> <li>- Community infrastructure levies can be used to contribute toward infrastructure change needed</li> </ul>

		<ul style="list-style-type: none"> <li>- Making community assets available to support food production – allotments, edible landscapes, repurposing green/brownfield sites, promoting food growing in new housing developments</li> </ul>
Procurement	Public procurement and catering in early years settings, schools, hospitals and catering in public places	<ul style="list-style-type: none"> <li>- Adopt healthy/sustainable food procurement policy, covering school meals, community meals, food for leisure centres, local authority owned care homes and local authority staff canteens/events</li> <li>- Work with Health and Wellbeing board(s) to encourage CCGs and NHS Trusts to take up the hospital food commissioning for quality and innovation framework (CQUIN)</li> </ul>
Use regulatory and legislative levers	<p>Advertising</p> <p>Food safety</p> <p>Breastfeeding</p> <p>Healthy start</p> <p>School meals</p> <p>Children’s centres</p> <p>Environmental health</p>	<ul style="list-style-type: none"> <li>- Put in place whole-school food policies</li> <li>- Increase uptake of free school meals</li> <li>- Scope a mechanism for ensuring adherence to school meal standards</li> <li>- Protect and promote children’s centres</li> <li>- Work with NHS Trusts to develop and maintain a healthy food strategy</li> <li>- Increase the uptake of healthy start and encourage more retailers to accept the vouchers</li> <li>- Create welcoming environment for breastfeeding in public places</li> <li>- Support breastfeeding women across the city returning to work to breastfeed, express and store breastmilk</li> <li>- Restrict advertising of unhealthy food</li> <li>- Connect work on healthy food with environmental health regulations</li> </ul>
Promoting Innovation	<p>Business promotion</p> <p>Waste reduction and circular economy</p> <p>Local food production and thriving local food economy</p>	<ul style="list-style-type: none"> <li>- Facilitate the use of derelict land or buildings for growing spaces/healthy food businesses (also links with planning actions below)</li> <li>- Use economic/tourism policies to support a healthy food economy</li> <li>- Business rate relief for healthy/sustainable food start-up businesses</li> <li>- Set a target for reducing food waste across the city</li> <li>- Incorporate food waste reduction into all relevant policies (eg. Procurement policies described above)</li> <li>- Support businesses through urban food awards</li> </ul>

		<ul style="list-style-type: none"> <li>- Explore establishing a local food innovation hub to support new healthy food businesses</li> </ul>
Mobilising the Population	Public communication Citizen Engagement Living wage	<ul style="list-style-type: none"> <li>- Establish on-going citizen engagement mechanisms on healthy food policy</li> <li>- Promote the (real) living wage to local employers and suppliers</li> <li>- Business rate reductions to businesses signing up to the living wage</li> <li>- Work with partners to implement a social prescribing schemes for fruit and veg, referrals to growing schemes, etc.</li> </ul>



## Conducting the Audit

### Step 1: Review conceptual framework and audit tool

Before you get started, we recommend reviewing the conceptual framework and audit tool to ensure it aligns with your policy priorities and opportunities and adapting if needed.

### Step 2: Interviews

To conduct the audit of policies, we recommend interviewing at least 15-20 officials – both within and external to the council/authority. As a complement to the interviews, the audit will also require internet-based desk research to identify written policies and materials (see step 3).

The interviews should cover a range of topics aligned with the conceptual framework and audit tool. When we conducted the audit for Birmingham, we spoke to individuals with authority over or in-depth knowledge on:

- Public health policy
- Early years provisions in the city
- Hospital food and clinical commissioning
- Civic catering and procurement
- Employee health
- Food safety and environmental health
- School food
- Advertising
- Planning
- Training and skills
- Business development and support
- City strategic development

The interviews can be semi-structured and need to illicit a wide range of information from each participant. The questions should focus on:

- Policy levers available within the city to create a healthy food economy
- Suitability of existing policies to deliver a healthy food economy
- Changes needed to existing policies to deliver a healthy food economy
- Gaps and additional policies needed to deliver a healthy food economy
- Coordination with the Combined Authority

Each interview will likely last between 30 and 60 minutes and can be conducted through a combination of in-person and phone interviews. We recommend recording and qualitatively analysing the interviews, using the audit tool to identify key themes within each subject or topic area as well as across topics.

The interviews can also be used to validate and supplement the audit tool – whereby policies and policy levers not previously identified are added to the audit tool.

### Step 3: Desk Research

To support the interviews, conduct targeted internet research. This includes reading written documents that correspond with policies or programmes that were identified in the interviews and investigating the emerging policy gaps to see if policies are documented that hadn't been discussed in the interviews.

#### Step 4: Summarising the Audit Findings

When we completed the audit, we analysed the interviews to identify key themes, topics and tensions (those policy areas that are in competition with other city/authority priorities, e.g. revenue or business growth). We also systematically reviewed the interviews to identify information about each policy action listed in the audit tool and summarised these in detailed tables (see Annex 1). As described above in our methods, we also conducted desk research to further evaluate the progress made on the policy actions.

By identifying where policy actions had already progressed, we were able to assess where there were policy gaps. However, it was important to overlay these policy gaps with the key themes, topics and tensions raised in the interviews to ensure our policy recommendations were realistic and guided by the views of the interview participants. We complemented each detailed policy table with a summary of the key themes and quotes from the interviews that were related to that topic.

#### Time and Resources to Conduct the Audit

Completing the Audit and writing the report will take dedicated staff or consultant time of approximately 90-100 hours or roughly 12 days. The person conducting the audit will need equipment to record the interviews (a phone can work well), and support from staff/officials within the local area to review and fact check the report.

## Annex 1: Detailed policy table templates

## Strategies and Plans

Policy Action	Enacted? (Yes, No, Partial, Emerging)	Identified by Interview	Identified by desk research
Establish a local food council/commission/coordinating group/task force			
Adopt a city-wide food plan			
Adopt local authority Declaration on Healthy Weight or Local Government Declaration on Sugar Reduction and Healthier Food			
Sign up to relevant international and national campaigns and pacts (e.g. Milan Urban Food Policy Pact, Sustainable Food Cities, Peas Please, etc)			
Sign up to UNICEF UK Baby Friendly Initiative			
Adopt a city-wide environmental sustainability action plan that includes food			
Include healthy food access and food poverty in other strategies/plans			

## Leading by Example

Policy Action	Enacted? (Yes, No, Partial, Emerging)	Identified by Interview	Identified by desk research
Adopt policies and procedures in city council owned and operated settings to lead by example			
Visible political leadership on food policy from elected officials			
Advertising restrictions on City Council estates/locations with Council authority			
Support women returning to work at the City Council to breastfeed, express and store breastmilk			
Implement the (real) living wage for all staff/contractors			
Healthy food in council canteens			

## Working with Combined Authority

Policy Action	Enacted? (Yes, No, Partial, Emerging)	Identified by Interview	Identified by desk research
Work in partnership with combined authority in areas they have authority			
Advertising restrictions on the transport network			

## Planning

Policy Action	Enacted? (Yes, No, Partial, Emerging)	Identified by Interview	Identified by desk research
Create a health/sustainability checklist for planning applications			
Supplementary planning documents restrict development of hot food takeaways			
Section 106 agreements to require financial agreements from hot food takeaways to support obesity/healthy food programmes			
Specify food shops as essential retail in the Local Plan to restrict change of use applications			
License/control street trading of unhealthy food			
Community infrastructure levies are used to contribute toward infrastructure needed to create a healthy food economy			
Making community assets available to support food production – allotments, edible landscapes, repurposing green/brownfield sites, promoting food growing in new housing developments			

## Procurement

Policy Action	Enacted? (Yes, No, Partial, Emerging)	Identified by Interview	Identified by desk research
Adopt healthy and sustainable food procurement policies, covering:			
- School meals			
- Community meals			

- Food at leisure centres			
- Local authority owned care homes			
- Local authority staff canteens			
- Local authority events			
Work with Health and Wellbeing board(s) to encourage CCGs and NHS Trusts to take up the hospital food commissioning for quality and innovation framework (CQUIN)			

### Use Regulatory and Legislative Levers

Policy Action	Enacted? (Yes, No, Partial, Emerging)	Identified by Interview	Identified by desk research
Put in place whole-school food policies			
Increase uptake of free school meals			
Scope a mechanism for ensuring adherence to school meal standards			
Protect and promote children's centres			
Work with NHS trusts to develop and maintain a healthy food strategy			
Increase the uptake of healthy start and encourage more retailers to accept the vouchers			
Create welcoming environments for breastfeeding in public places			
Support breastfeeding women across the city returning to work to breastfeed, express and store breastmilk			
Restrict advertising of unhealthy food			
Connect work on healthy food with environmental health regulations			

### Promoting Innovation

Policy Action	Enacted? (Yes, No, Partial, Emerging)	Identified by Interview	Identified by desk research
Facilitate the use of derelict land or buildings for growing spaces/healthy food businesses			

(also links with planning actions above)			
Use economic/tourism policies to support a healthy food economy			
Business rate relief for healthy/sustainable start up food businesses			
Set a target for reducing food waste across the city			
Incorporate food waste reduction into all relevant policies (e.g. procurement policies described above)			
Support businesses through urban food awards			
Explore establishing a local food innovation hub to support new healthy food businesses			

### Mobilising the Population

Policy Action	Enacted? (Yes, No, Partial, Emerging)	Identified by Interview	Identified by desk research
Establish on-going citizen engagement mechanisms on healthy food policy			
Promote the (real) living wage to local employers and suppliers			
Business rate reductions to businesses signing up to the living wage			
Work with partners to implement a social prescribing scheme for fruit and veg, referrals to growing schemes, etc.			

## Annex 2: Example Summary of Audit Results (Shared with permission from Birmingham City Council)

### Strategies and Plans

Structures in place	Policy gaps and opportunities
<ul style="list-style-type: none"> <li>Establish a local council/commission/ coordinating group/task force- <i>emerging</i></li> <li>Local authority Declaration on Healthy Weight or Local Government Declaration on Sugar</li> <li>Sign up to relevant international and national campaigns and pacts</li> <li>UNICEF UK Baby Friendly Initiative</li> </ul>	<ul style="list-style-type: none"> <li>City wide food plan</li> <li>Local authority Declaration on Healthy Weight or Local Government Declaration on Healthier Food</li> <li>Include healthy food access and food poverty in other strategies/plans</li> <li>Work with the environmental health team</li> </ul>

### Use regulatory and legislative levers

Structures in place	Policy gaps and opportunities
<ul style="list-style-type: none"> <li>Work with NHS trusts to develop and maintain a healthy food strategy- <i>partial</i></li> <li>Increase the uptake of healthy start and encourage more retailers to accept the vouchers</li> <li>Restrict advertising of unhealthy food- <i>emerging</i></li> <li>Happy Healthy Holidays programme</li> <li>HENRY</li> <li>Start Well</li> <li>BUMP</li> </ul>	<ul style="list-style-type: none"> <li>Put in place whole-school food policies</li> <li>Increase uptake of free school meals</li> <li>Scope a mechanism for ensuring adherence to school meal standards</li> <li>Protect and promote children’s centres</li> <li>Create welcoming environments for breastfeeding in public places</li> <li>Support breastfeeding women across the city returning to work to breastfeed, express and store breastmilk</li> <li>Connect work on healthy food with environmental health regulations</li> </ul>



### Leading by example

Structures in place	Policy gaps and opportunities
<ul style="list-style-type: none"> <li>Adopt policies and procedures in city council owned and operated settings to lead by example- <i>emerging</i></li> <li>Visible political leadership on food policy</li> <li>Advertising restrictions on City Council estates/locations with Council authority- <i>partial</i></li> <li>Implement the (real) living wage for all staff/contractors</li> <li>Healthy food in BCC canteens- <i>partial</i></li> </ul>	<ul style="list-style-type: none"> <li>Support women returning to work at the City Council to breastfeed, express and store breastmilk</li> <li>Incorporate more food issues into new culture change programme for employees</li> <li>Strategy for healthier food procurement</li> </ul>

### Promoting Innovation

Structures in place	Policy gaps and opportunities
<ul style="list-style-type: none"> <li>Facilitate the use of derelict land or buildings for growing spaces/healthy food businesses (also links with planning actions above)- <i>emerging</i></li> <li>Set a target for reducing food waste across the city</li> <li>Incorporate food waste reduction into all relevant policies (e.g. procurement policies described above)- <i>partial</i></li> <li>Explore establishing a local food innovation hub to support new healthy food businesses</li> </ul>	<ul style="list-style-type: none"> <li>Use economic/tourism policies to support a healthy food economy</li> <li>Business rate relief for healthy/sustainable start up food businesses</li> <li>Support businesses through urban food awards</li> </ul>



**Procurement**

Structures in place	Policy gaps and opportunities
<ul style="list-style-type: none"> <li>Adopt healthy and sustainable food procurement policies, covering:                             <ul style="list-style-type: none"> <li>School Meals</li> <li>Local authority staff canteens- <i>partial</i></li> <li>Local authority events- <i>partial</i></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Adopt healthy and sustainable food procurement policies, covering:                             <ul style="list-style-type: none"> <li>Community meals</li> <li>Food at leisure centres</li> <li>Local authority owed care homes</li> </ul> </li> <li>Work with Health and Wellbeing board(s) to encourage CCGs and NHS Trusts to take up the hospital food commissioning for quality and innovation framework (CQUIN)</li> </ul>

**Mobilising the population**

Structures in place	Policy gaps and opportunities
<ul style="list-style-type: none"> <li>Establish on-going citizen engagement mechanisms on healthy food policy</li> <li>Promote the (real) living wage to local employers and suppliers- <i>emerging</i></li> </ul>	<ul style="list-style-type: none"> <li>Business rate reductions to businesses signing up to the living wage</li> <li>Work with partners to expand existing social prescribing scheme for fruit and veg, referrals to growing schemes, etc.</li> </ul>



**Planning**

Structures in place	Policy gaps and opportunities
<ul style="list-style-type: none"> <li>Supplementary planning documents restrict development of hot food takeaways</li> <li>Making community assets available to support food production – allotments, edible landscapes, repurposing green/brownfield sites, promoting food growing in new housing developments- <i>partial</i></li> </ul>	<ul style="list-style-type: none"> <li>Create a health/sustainability checklist for planning applications</li> <li>Use section 106 agreements to require financial agreements from hot food takeaways to support obesity/healthy food programmes</li> <li>Specify food shops as essential retail in the Local Plan to restrict change of use applications</li> <li>License/control street trading of unhealthy food</li> <li>Community infrastructure levies are used to contribute toward infrastructure needed to create a healthy food economy</li> </ul>

**Working with West Midlands Combined Authority**

Structures in place	Policy gaps and opportunities
<ul style="list-style-type: none"> <li>Work in partnership with WMCA in areas they have authority- <i>partial</i></li> <li>Advertising restrictions on the transport network- <i>partial</i></li> </ul>	<ul style="list-style-type: none"> <li>Collaborating to create a healthy food economy</li> <li>'Thrive at Work' programme could have a greater focus on healthier food</li> </ul>

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