Consultation on Proposed Options to Improve and Assure the Nutritional Standards of Food in Hospitals

BMA Scotland submission
June 2016

Introduction
The British Medical Association (BMA) is a registered trade union and professional association representing doctors from all branches of medicine. The BMA has a total membership of around 150,000 representing around two-thirds of all practising doctors in the UK. In Scotland, the BMA represents around 16,000 members.

We welcome the opportunity to contribute to this consultation on improving nutritional standards of hospital food in Scotland.

A significant number of patients admitted to hospitals in Scotland are undernourished, many of whom are over the age of 65. Such undernourishment can contribute to their ill-health, so it is important that during their hospital stay patients receive the nutrition needed to facilitate their recovery.

Meanwhile increasing rates of obesity are posing a growing challenge to the NHS. Two thirds of adults in Scotland are overweight or obese and the cost of obesity to NHS Scotland is predicted to reach £3 billion by 2030. A societal change is needed so that people’s dietary choices default to healthy options.

The closed setting provided by the healthcare environment creates an important opportunity for promoting and supporting healthy behaviours. Hospitals should be an exemplar of best practice in supporting healthy dietary choices, and in addressing broader social norms. Hospital patients, including children and young people, must be provided with healthy, nutritious and appetising meals. There is also a key role for hospitals to support the health and wellbeing of staff and visitors.

Proposed Options to improve nutritional standard of food in hospitals

Question 1: Which option or options would you support from the ‘Options and proposal for consultation’ section of the consultation document?

Please select the box opposite your preferred option. If you support more than one option, please indicate with a number in the box opposite with 1 for your most preferred option and 4 for your least preferred option.

Option 1 ☒
Option 2 □
Option 3 □
Option 4 □
None □

Question 2: Please provide any reasons for your answer to Question 1 in the box below.
Putting nutritional food standards on a statutory footing would provide an important safeguard for patients and help to ensure that their nutritional requirements are met while they are in hospital, while also reducing variations in standards between hospitals or board areas.

At a time when NHS resources are coming under ever greater strain, it is important that hospital catering budgets do not come to be seen as an easy way for boards to save money. By legislating to create legal minimum standards of nutrition, boards are likely to give greater priority to complying with the standards set out in *Food in Hospitals*.

The BMA would also welcome independent scrutiny of how those standards are enforced, as this would be likely to further help to prevent any regional variations in how those standards are interpreted and implemented.

However, it is important that any legislation on nutritional standards for hospital food recognises that some patients require diets that are appropriate to their specific clinical needs. These clinical dietary needs are reflected in the current *Food in Hospitals* guidance and any legislation should continue to ensure that the clinical needs of patients must always take priority.

**Question 3:** Do you think that the policies and programmes currently in place will continue to drive up the nutritional standards of hospital food?

Yes ☒
No □

Progress has been made in improving the quality of hospital food in Scotland since the introduction of comprehensive nutritional standards in 2008. A *Which?* Review in 2011 rated Scotland to have the best hospital food in the UK.

However, while such progress is of course welcome, the BMA believes that there remains significant room for further improvement in the nutritional quality of hospital food and putting standards on a statutory footing can help to accelerate the rate of improvement.

**Question 4:** Since 2009, HFS have published reports every six months based on NHS Boards’ self-assessed compliance with ‘*Food in Hospitals*’. Do you think that independent inspection is required to monitor NHS Boards’ compliance with the ‘*Food in Hospitals*’ standards?

Yes ☒
No □

Introducing independent inspection of hospital food standards will help to bring greater focus on monitoring and enforcing standards. Independent scrutiny will also help to prevent any variability in the implementation of nutritional standards between health boards.

**Question 5:** Should the monitoring of the ‘*Food in Hospital*’ guidance be broadened to include Private Hospitals providing NHS treatments?

Regardless of whether they are treated in an NHS or private healthcare setting, patients should always expect to receive a high minimum standard of nutrition while in hospital. Additionally, health
boards at times contract private hospitals to treat NHS patients in order to comply with waiting time targets. Exempting private sector hospitals from meeting the same nutritional requirements as NHS hospitals could disadvantage NHS patients who are treated in private hospitals, undermining the quality of their care.

General comments

Question 14: Do you have any other suggestions for how NHS Scotland can improve the nutritional quality of hospital food for patients?

As well as seeking to improve the nutritional quality of the food served by hospitals to patients, it is important to recognise that many patients will also consume food and drink that is sold in hospital shops or vending machines during their time in hospital.

In recognition of this, rules already in place mean that all soft drinks sold in vending machines must be sugar-free and that 30% of snack/confectionary vending and 70% of refrigerated food vending must be healthier choices. Meanwhile caterers operating in hospitals in Scotland are required to follow ‘healthyliving award’ criteria while retailers are required to join the Scottish Grocers’ Federation Health Living Programme.

However, these requirements still leave considerable scope for the sale of unhealthy food and drink within hospitals, some of which will be consumed by patients. The BMA would ultimately like to see the sale of unhealthy food or drink within hospitals phased out and believes that action to achieve this aim should be included in any move to legislate on hospital food standards.

Question 16: Do you have any other comments you would wish to make?

For some patients, ensuring that they eat anything can be as great a priority as ensuring that what they do eat in hospital is healthy and nutritious. As well as the food offered by hospitals being nutritious, it is also important that patients are able to choose what they eat from a good selection of meals, that should include options that are familiar to patients of a variety of ages or social backgrounds and meet the needs of different dietary requirements.

It should also be recognised that unappetising food that has been prepared off-site and reheated can also make meals more likely to go uneaten, potentially delaying a patient’s recovery. Ensuring that hospital food is adequately resourced can help to improve patient outcomes.

In addition to providing healthy, nutritious food and drink to patients, hospitals also have a responsibility to consider the food that is offered on site to visitors and hospital staff.

Hospital staff in particular often have no choice but to rely on the food offered in vending machines or hospital shops if they are working at times when hospital canteens are closed. The BMA would like to see hospitals pay greater attention to their responsibilities to staff and ensure that hot and nutritious food is available round the clock, seven days a week and would welcome consideration of how provision in this area can be improved.

For more information or to arrange a meeting, please contact:
Neil Dunsire, BMA Scotland Public Affairs Officer
T: 0131 237 3052 E: ndunsire@bma.org.uk