

Ms Susan Neilands  
Consultation on Nutritional Guidance for Early Years  
Early Education & Childcare Division  
Scottish Executive  
Area 2B (North)  
Victoria Quay  
Edinburgh  
EH6 6QQ

27 June 2005

Dear Ms Neilands

### **Nutritional Guidance for Early Years Consultation**

The Scottish Consumer Council (SCC) welcomes the opportunity to comment on the consultation on Nutritional Guidance for the Early Years. The purpose of the SCC is to make all consumers in Scotland matter. We do this by putting forward the consumer interest, particularly that of the disadvantaged groups in society, by working with those people who can make a difference to achieve beneficial change.

The SCC has had a long-standing interest in the provision of food in schools, particularly through the work of the Scottish Healthy Choices Awards Scheme (SHCAS) and the Scottish Community Diet Project (SCDP) which both operate within the SCC. We welcome this initiative to extend nutritional guidance to the early years.

Our specific comments are as follows;

#### **2.1 Developing Positive eating Habits**

SCC fully supports the need to develop positive eating habits early on and the need to expose children to new foods. It is essential that the social aspects are also considered—for example the use of cutlery. Learning from peers is important—for example a child seeing other children trying and enjoying food that they may have refused to eat.

SCC would also like to see the inclusion in this section of a paragraph covering the involvement of children in the preparation of food –this would need to start simply and be supervised. It is important to engage them at an early age.

## **2.2 Nutrient guidance for early years**

SCC welcomes the fact that specific nutritional guidance is given for different age groups

## **2.3 Menu Planning**

The menus given appear to be well thought out and are user friendly, giving good practical advice. SCC feels that the way menu planning is given by food group and followed by examples works well. We would endorse the push for a variety of foods to be given and at different temperatures.

## **3.2 Drinks**

SCC would agree that children have access to cooled drinking water whenever they want. This has many benefits including improved concentration levels.

## **3.6 Children with special needs or therapeutic diets**

SCC acknowledge the importance of including special diets

Food allergies are covered in this section. Since some food allergies can be life-threatening SCC feel that there should be a special section covering this. Allergy is on the increase (it is estimated that 8% of children have food induced anaphylaxis) and it is thought that at least 76% of deaths follow the consumption of food prepared away from home.

It is essential that there is a protocol in place in nurseries and other establishments caring for children so that allergies are recorded and details given for procedures in case of an emergency. There should also be a communication checklist to ensure all members of staff are aware this. As there is often quite a high turn over of staff in some nurseries it is important that information is given to new staff at their induction.

## **3.7 Oral and Dental Health for Toddlers and Pre School Children**

SCC welcomes the inclusion of paragraphs on tooth brushing and registering with a dentist.

#### **4.1 Involving Parents and Guardians**

SCC agrees that it is important to build up partnerships. It is important to emphasise with the parents that the nutrition of their child is a shared responsibility.

It would be better to see the shared responsibility of parents and staff evidenced throughout the document rather than a short paragraph at the end. Staff need to see informing parents as part of their day to day job, rather than something tagged on at the end.

#### **4.2 Developing a food and nutrition policy**

The framework for a policy is clear and a good starting point. It should be emphasised that it is extremely important to have a policy in place.

#### **4.3 Training**

It is essential that adequate training of staff is given and that resources are made available for this. It is not clear where these resources will come from. Resources will be needed for implementation of guidelines too, not just for delivering training

#### **4.4 Monitoring and evaluation**

It is vital that this guidance is monitored and evaluated. However, it is not clear who will do the monitoring and where the resources will come from. It is important that the whole range of establishments is studied.

SCC looks forward to receiving information on how the monitoring will be carried out and also to receiving the results of this monitoring and evaluation.

I hope these comments are useful and if you require any other information, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink that reads "Martyn Evans". The signature is written in a cursive style with a large initial 'M'.

Martyn Evans  
DIRECTOR