



**FOOD
STANDARDS
AGENCY**

**DISCUSSIONS WITH THE SCHOOL COUNCIL NETWORK ON THE
OFCOM CONSULTATION**

(BROADCAST ADVERTISING OF FOOD TO CHILDREN)

Background

1. The Consumer Branch has developed a School Council Network with 9 schools across England. The main purpose of the School Council Network is to listen to and understand the views of children and young people especially in relation to food.
2. The Agency has been working with 4 Secondary and 5 Primary schools throughout England in areas as diverse as Lyme Regis, Liverpool, Barnsley and Northampton. (A full list of schools is attached for information as part of Annex A). Termly meetings are planned with each of the 9 schools councils throughout the school year.
3. The meetings held in May and June 06 focussed on two policy issues, Broadcast Advertising of Food to Children the Ofcom Consultation and the possible mandatory fortification of flour with folic acid. This paper concentrates on the Ofcom Consultation and the responses made by the School Council Network to the three options set out in the consultation document.

Purpose

4. The Agency as part of its 'putting the consumer first' policy is keen to engage with young people on issues that may affect them. The School Council Network is an effective way of doing this.

Method

5. Every School Council was shown a short video clip containing a selection of food adverts currently being aired that are aimed at children and young people. This helped to stimulate their thinking about adverts and the possible effects they have and their reactions to them. A discussion was then held focussing on:
 - general thoughts about TV adverts on food
 - whether notice was taken of the products,
 - recognition and recall of adverts and the amount of influence they felt adverts had.
6. The Ofcom options were then discussed with each option being examined in more detail. It was explained that concern had been expressed about adverts that were for foods high in fat, sugar and salt (HFSS).

OFCOM Options

1. RESTRICTING ADVERTS OF HFSS FOODS

Main Points of Option 1

- No HFSS product advertising to be shown in programmes made for pre-school children
 - No HFSS product advertising to be shown in programmes specifically made for children
 - No HFSS product advertising to be shown in programmes that appeal to children up to 9 years old
 - No sponsorship by HFSS products of programmes affected by above restrictions
7. The view was taken that adverts aimed at children under 9 years old should be abolished as children at this age they were not old enough to fully comprehend the meaning of adverts and may have difficulty distinguishing fact from fiction. This is a view supported by FSA research that indicates the youngest children are not able to distinguish between programmes and advertisements.
8. The 'toy for product syndrome' was mentioned by several young people, i.e. purchasing a toy or gadget was the most important factor and food the secondary issue. It was also noted that the toys were predominantly linked to the un-healthier meals offered by some of the fast food chains and there was some concern about this. The School Councils were not opposed to this marketing concept but felt that it would serve a better purpose if they were linked to healthier foods.
9. All the School Councils we met endorsed the idea of timing restrictions on foods high in fat, sugar and salt. Currently the messages about eating healthily are heard, but this message appears to be inconsistent with media portrayal about food and diet in general.
10. This was the preferred option of the three discussed, however some of the older children (i.e. those in year 6 in primary schools and some secondary schools) saw this as a possible infringement of their liberties i.e. restricting their choice on the foods they could eat.

2. RESTRICT ALL FOOD & DRINK ADVERTS, ONLY HEALTHY FOOD ADVERTISED

Main Points of Option 2

- No food or drink advertising to be shown in programmes made for pre-school children
 - No food or drink advertising to be shown in programmes specifically made for children
 - No food or drink advertising to be shown in programmes of particular appeal to children up to 9years old
 - No sponsorship by food or drink products of programmes affected by the above restrictions
 - The above restrictions do not apply to healthy eating campaigns supported or endorsed by the Government
11. This particular option was not popular, almost all the School Councils did not like the idea of the 'government' being in charge of adverts and deciding what they could or could not watch. This was seen as a draconian approach.
12. Some pupils also made the point that this only referred to broadcast media and if this form of advertising was totally restricted other types of advertising might be used as an alternative. Concern was raised that advertising through other mechanisms would probably be more aggressively targeted at children and the objective of restricting these adverts would therefore fail. Completely banning broadcast adverts in this technological age was seen to be a futile exercise.
13. A general point was made that by simply banning all adverts for food and drink, that were perceived as unhealthy, would not on its own stop children of this generation eating unhealthily. Foods that are high in high in fat sugar and salt are well known and not advertising them at all could create an atmosphere where foods of this kind take on a mystery where young people have an increased desire to purchase and consume these products.

3. REDUCTION IN ALL FOOD & DRINK ADVERTS

Main Points of Option 3

- No food or drink advertising to be shown in programmes made for pre-school children
 - Limits of 30 seconds an hour between 6 -9am, 3-6pm & 6am week days and between 1pm and 8pm weekends
 - Limits of 60 sec an hr from 6pm – 8pm week days and 1pm – 8pm weekends
 - Limits of 30 sec an hr all day on children's channels
14. In principle there was general agreement that this option and parts of option 1 would have the most impact. However when pushed some pupils felt that a possible consequence of airing shorter adverts could be that they become more sophisticated and are instantly recognised and therefore more powerful.
15. The idea of limiting adverts during peak viewing times for children was agreed to be a good idea however for some young people (as for some adults) adverts were generally considered to be a 'turn off' and often resulted in channel surfing.
16. School Councils were given the opportunity to talk about when most TV was watched, as the times that TV is watched is a crucial ingredient in the options being considered by Ofcom. Whilst some of the times young people claimed to watch TV had to be considered with an element of caution due to bravado and the desire to shock, there was an underlying element of truth in the comments that TV was watched up to and past the 9.00 watershed. Others young people however did not mention watching TV after the watershed and viewing times depended largely on family behaviours. The School Councils felt that what ever option was chosen the viewing times of young people should be included as a factor.
17. Research has shown that an increasing number of young people now have access to a TV in their bedroom, which reduces the influence adults / parents have to control TV viewing by young people. It may be incorrect to assume that children turn off the TV when 'Children's TV' ends in the late afternoon. Patterns of TV viewing change depending on homework loads, programmes, parental restrictions and a range of other factors.

Conclusion

18. The School Councils welcomed the work taking place to reduce the exposure to foods high in fat, sugar and salt. There was unanimous agreement that adverts aimed at children under 9 years old should be banned. Concern however was also expressed about the use of other mediums to promote products to children and young people.
19. Some of the older School Council members thought that the Ofcom options could be more effective if elements of option 1 and option 3 were combined.

ANNEX A

The Schools that are part of the School Council Network

School	Location	Catchment Area
Bishop Martin Church of England	Liverpool	LEA Area – Liverpool

Type of School

- Infant and junior
- Age 4 –11
- Mixed gender
- 204 pupils

Diversity of School Population

- 4% of pupils are from ethnic minority backgrounds
- The school is located in a nice residential area in the suburbs of Liverpool

School	Location	Catchment Area
Christ Church CE (JA) Junior School	Sowerby Bridge	LEA Area – Calderdale

Type of School

- Junior
- Age 7 – 11
- Mixed gender
- 154 pupils

Diversity of School Population

- Majority of pupils are of white UK heritage
- The school serves an area of old terraced and council built homes
- A significant number of pupils are from families that do not comprise the two natural parents

School	Location	Catchment Area
Higham Ferrers Junior School	Rushden	LEA Area – Northamptonshire

Type of School

- Junior
- Age 7 – 11
- Mixed gender
- 343 pupils

Diversity of School Population

- Predominately white
- The school is in a rural town where general indicators of prosperity are below the national average

School	Location	Catchment Area
Shinfield St Mary's CE Junior School	Reading	LEA Area – Wokingham

Type of School

- Junior
- Age 7 – 11
- Mixed gender
- 221 pupils

Diversity of School Population

- Mostly white (good mix of cultures and ethnicity)
- Although the school is in a village location, most of the pupils come from South Reading which is less prosperous than the immediate area around the school

School	Location	Catchment Area
Star Primary School	Canning Town	LEA Area – Newham

Type of School

- Infant and Junior
- Age 3 –11
- Mixed gender
- 610 pupils

Diversity of Population

- The school is multi-cultural, just under 50% of pupils speak English as an additional language
- Many of the children live in council owned flats

School	Location	Catchment Area
The Woodroffe School	Lyme Regis	LEA Area – Dorset

Type of School

- Comprehensive
- Age 11 - 18
- Mixed gender
- 886 pupils

Diversity of the School Population

- Predominately white
- The school takes pupils from a wide area of the Devon / Dorset borders and a very mixed socio-economic profile

School	Location	Catchment Area
Darton High School	Kexborough	LEA Area – Barnsley

Type of School

- Comprehensive
- Age 11 – 16
- Mixed gender
- 1064 pupils

Diversity of School Population

- Predominately White
- The area which the majority of pupils are drawn from has above average levels of disadvantage

School	Location	Catchment Area
Cheadle Hulme College	Cheadle	LEA Area – Stockport

Type of School

- Comprehensive
- Age 11 – 16
- Mixed gender
- 1351 pupils

Diversity of School Population

- 5% of pupils have English as an additional language
- Large spread of social backgrounds

School	Location	Catchment Area
Abraham Guest High School	Wigan	LEA Area – Wigan

Type of School

- Comprehensive
- Age 11 –16
- Mixed gender
- 946 pupils

Diversity of School Population

- Predominantly white
- Located in a pleasant residential area 605 of pupils are from two deprived wards with high unemployment