Supporting Healthy Choices: A framework for voluntary action

An invitation to the food industry to work in partnership with Government in Scotland





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Foreword



In Scotland, poor diet contributes significantly to health inequalities including our high rates of preventable disease such as cancer, heart disease, diabetes, and obesity. Progress towards meeting the Scottish Dietary Goals continues to be slow; consumption of foods high in fats, salt and sugar remains too high whilst intake of fruit and vegetables, oily fish and fibre is stubbornly low.

There is considerable scope for action and Government, business, public and third sectors, as well as consumers, all have a role to play to support healthier choices in Scotland. A lot of innovative work is already underway. However, with nearly two-thirds of adults and a third of children in Scotland overweight or obese, it is clear that we need to do more to support people to eat a healthy balanced diet.

Following lengthy consultation with stakeholders, this new Supporting Healthy Choices Voluntary Framework sets out the action we believe is necessary to shape and better support healthier diets in Scotland.

Developed jointly by the Scottish Government and Food Standards Agency in Scotland, this framework invites the food and drink industry and other partners to take specific voluntary action to create a healthier food environment for consumers; one which readily encourages healthier choices and better supports sustained health behaviour change. The food and drink industry is particularly well placed to influence the choices consumers make and this is reflected in this framework.

From reformulation and rebalancing promotions to labelling and marketing, I urge partners to consider how they can work with us to achieve our vision for a healthier Scotland.

The Scottish Government and the Food Standards Agency in Scotland are committed to working collaboratively with stakeholders to deliver the action set out in this framework whilst continuing to promote sustainable economic growth across the food and drink sector. In doing so, we want to celebrate success and recognise those partners who are leading the way and share good practice. Equally, we want to work with, and support, those who are taking pragmatic steps in the right direction, often in a challenging economic climate, to help them do more.

Together, we can create the step change required to support healthier diets in Scotland and realise our vision of a healthier, more prosperous Scotland.

Michael Matheson Minister for Public Health

Introduction

Core principles

1. In Scotland we need to inspire healthier diets among our people to help to reduce health inequalities for the country's longer-term economic benefit. Rebalancing our diet, and that of our children, is a responsibility shared between individuals, communities, industry and Government; but changing

established habits is neither easy nor quick. Consistent messages and education are crucial, across all life-stages, using a broad range of techniques. The food and drink environment has enormous potential to encourage and influence healthier choices, across the whole food journey from advertising and in-situ marketing to reformulation and provision of healthier products.

This framework is centred on rebalancing the Scottish diet using four **core principles**, to:

- put the health of children first in food-related decisions
- rebalance promotional activities to significantly shift the balance towards healthier choices
- support consumers and communities with education and information:
 - working in partnership on social marketing campaigns
 - providing nutrition information on labels and calorie labelling on menus
- formulate healthier products and menus across retail and out of home catering:
 - reformulating existing products over time
 - improving kitchen practice

Partnership

- 2. This framework sets out the Scottish Government and the Food Standards Agency in Scotland (FSA Scotland) ambition to work collaboratively with partners to improve Scotland's diet and tackle health inequalities. Partners include the Scottish Government, the FSA Scotland, the food and drink industry, including retailers, manufacturers and out of home catering businesses, the NHS and local authorities, as well as consumers.
- **3.** We invite all partners to work with us by implementing a range of voluntary commitments which reflect the action we believe is necessary to rebalance diets in Scotland.

Foundations

4. This framework is consistent with our ambition across Scottish Government to support healthier diets whilst promoting sustainable economic growth across Scotland's food and drink sector. The framework is underpinned by The National Food and Drink Policy, Recipe for Success¹ and the Preventing Overweight and Obesity Route Map² which remain active. The action set out in this framework develops some of their health and 'energy intake' principles. A consultation on the next stage of the national food and drink policy, Becoming a Good Food Nation³, has now been launched and health remains a key focus. The Scottish Dietary Goals, revised in 2013, which are set out at **Annex A**, provide the foundation for diet and health policy in Scotland and set out the key outcomes we need to achieve for the Scottish population.

Landscape

5. Scotland benefits from the *Responsibility Deal*, but our poor dietary status warrants further action. Moving towards the Scottish Dietary Goals requires long-term, sustained action from Government, the NHS, the food and drink industry and other partners, as well as consumers, in terms of ongoing behaviour change. Many partners have already made substantive contributions towards healthier sales; we intend to build on these efforts whilst encouraging others to make similar progress.

Healthy lifestyles

6. This framework intentionally focuses on diet and action to support healthier food choices. However, we recognise that alongside a healthy balanced diet, physical activity is also essential to maintain good health and a healthy weight. We are aware that partners are involved in a range of initiatives across Scotland to encourage adults and children to be more physically active and lead healthier lifestyles. We welcome this activity and encourage partners to look for opportunities to build on and extend this work to also support healthier food choices and diets.

National Food and Drink Policy, Recipe for Success: http://www.scotland.gov.uk/Publications/2009/06/25133322/0

Preventing Overweight and Obesity Route Map: http:// www.scotland.gov.uk/Publications/2010/02/17140721/0

Becoming a Good Food Nation http://www.scotland.gov.uk/Resource/0045/00453219.pdf

Sustainability

7. Scotland's fantastic natural larder places within our grasp the means to achieve a healthy and environmentally sustainable diet for all. But only with a healthy workforce, both present and future, can our country become truly sustainable economically and realise our full growth potential.

Access

8. Barriers continue to exist which prevent some individuals from accessing a healthy diet. We will continue to work with partners, including the food and drink industry as well as the third sector, to address those barriers and ensure that everyone in Scotland has the opportunity to access a healthy, affordable diet for both themselves and their families.

Openness

9. This framework is available on the Scottish Government website⁴ so that it can be seen and accessed by all partners, regardless of size or location. We will use a range of media to communicate proactively all updates and progress on the framework. Celebrating the successes of all participating partners will be a key part of our communications strategy.

http://www.scotland.gov.uk/Topics/Health/Healthy-Living/Food-Health/supportinghealthierchoices

Sign up, reporting and monitoring

10. This framework is intended to be sufficiently flexible to maximise participation, recognising that what partners will be able to contribute will depend on the nature of their business or organisation.

Sign up

- **11.** The sign up process for Supporting Healthy Choices is simple. To sign up, partners are asked to specify which commitments they intend to work towards over the course of the next year. In doing so, partners will be required to submit a short action plan setting out the activity they have taken, or intend to take, in relation to the commitments they sign up to. Action plans will be published on our website.
- **12.** All action plans should include the following:
- Details of the commitments a partner is signing up to;
- The action(s) a partner is taking/will take under each of these commitments:
- Details of other work that supports healthier choices but does not fall under a specific commitment; and
- Any other relevant information.

- **13.** We encourage partners to sign up to Supporting Healthy Choices as soon as they are able, where possible within the first 3-6 months of this document being published. Sign up will, however, continue on a rolling basis throughout the year.
- **14.** Partners are not required to sign up to all the commitments set out in this framework but are strongly encouraged to sign up to as many as possible which are relevant to their business.
- **15.** The action outlined in this framework is not exhaustive and we welcome all work which supports healthier food and drink choices across Scotland. Partners are invited to include details of any additional or alternative work they are progressing in their action plan that supports improving the Scottish diet.

Reporting

- **16.** Partners will be required to submit a short progress report to the Scottish Government annually. This report should be based on their action plan and should be submitted on 1 July each year. As part of this process, partners will also be invited to update their action plan to reflect activity for the following year.
- 17. The Scottish Government will use these reports to publish a summary of progress across Scotland annually. This will be a high-level report which will recognise and highlight progress and good practice where appropriate, and identify areas where further action is required. This report will be available on our website.
- **18.** We will also continue to engage with partners throughput the year. Further information regarding the timescales for sign up and reporting is available online⁵.

Monitoring

19. Progress will be monitored by FSA Scotland at a population level through established surveys which monitor food and nutrient intake and consumer behaviour. This includes analysis of data from the Scottish Health Survey, the ONS Living Costs and Food Survey, commissioned surveys of children's diets and urinary salt survey to monitor population salt intakes. Kantar World Panel data on food, beverages and nutrients purchased into the home and NPD Crest data on purchase of food and beverages eaten outside the home will be used to monitor promotions and levels of salt, saturated fat, fat and sugar purchased in Scotland to identify any changes.

⁵ http://www.scotland.gov.uk/Topics/Health/Healthy-Living/Food-Health/supportinghealthierchoices

Putting children's health first

20. Our national outcomes and indicators stress the importance of living longer, healthier lives, for ourselves and our children, with a focus on children being a healthy weight. Each section of this document can have a positive impact on children. However, given the vital importance of diet for children's longer-term health outcomes, we believe that specific proposals to improve children's diet are warranted.



Commitment 1

We invite retailers and out of home caterers to take pragmatic steps to remove confectionery and sugary drinks from till points, checkout aisles and areas around checkouts.

21. We consume large quantities of sugary soft drinks and confectionery in Scotland⁶, and children consume proportionally more sugar in their diets than adults. Recent data⁷ shows that intakes in Scotland, in line with those across the UK⁸, are considerably higher than recommended in the Scottish Dietary Goal for sugar intake.

- **22.** We therefore suggest that all retailers and, where applicable, out of home caterers, take pragmatic steps to remove confectionery and sugary drinks from points of purchase across Scotland to reduce the scope for impulse purchase. These items can be replaced with healthier alternatives. Businesses may wish to take a pragmatic approach when deciding which products they replace. We very much welcome the positive action that some businesses are already taking to do this.
- **23.** Where full implementation is not possible, we encourage businesses to implement this commitment as far as possible and welcome specific action to support healthier choices at and around till points.
- **24.** Savoury snacks contribute significantly to fat and saturated fat intakes in Scotland and they are one of top products contributing salt in retail purchases in Scotland. This should be considered when replacing confectionery and sugary drinks with alternatives.
- 25. We recognise that this commitment will be more challenging for some, particularly for small businesses and smaller format stores. Support⁹ and guidance is available and we would encourage businesses to access these resources to help them take positive action in this area. We will support Scottish Grocers Federation *Healthy Living Programme* members to work towards alternative solutions to till points on an ongoing basis.

⁶ Barton K and Wrieden W Estimation of Food and Nutrient Intakes from Food Survey data in Scotland 2001-2009 (2012). See http://www.foodbase.org.uk/results.php?f_ report_id=749

http://www.foodbase.org.uk//admintools/ reportdocuments/777-1-1329_FS424019_FINAL_Pt1.pdf

Bates et al, National Diet and Nutrition Survey Headline results from Years 1 and 2 (combined) of the Rolling Programme (2008/2009 - 2009/10). See https://www.gov.uk/government/uploads/system/ uploads/attachment_data/file/216484/dh_128550. pdf http://www.dh.gov.uk/prod_consum_dh/groups/ dh_digitalassets/documents/digitalasset/dh_128550.pdf

⁹ http://www.scottishshop.org.uk/sgfhlp

26. The Scottish Government's HealthyLiving Award provides support for out of home caterers to help them offer healthier options for customers. Guidance for the HealthyLiving Award Plus already states that confectionery and crisps should not be positioned next to till points. The Healthy Living Award team will continue to support out of home caterers to meet this requirement.

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Commitment 3

We invite retailers and out of home caterers to provide and incentivise healthier meal deals*, especially where customers include schoolage children purchasing lunch.

*Can include breakfast, lunch and dinner meal deals

3

Commitment 2

The Scottish Government will publish a guide for out of home caterers on healthy options for children's menus by end 2014.

Businesses are invited to use this guide once it is available.

- 27. We encourage out of home caterers to provide healthy options for children. This could mean providing smaller portions of healthy adult meal options and/or ensuring that salad or vegetables are offered as part of every child's meal. However, many caterers offer specific children's menus. These have strong potential to offer children healthy options with suitable calories, sugar, saturated fat and salt content and appropriate portion sizes.
- **28.** To support healthier catering for children, the Scottish Government will develop a good practice guide for out of home caterers on healthy meal options for children's menus by end 2014. Caterers will be invited to use this guide once it is available.

29. A recent market research report commissioned by FSA Scotland¹⁰ reveals frequent purchasing of calorie rich, high fat/sugar foods and drinks in Scotland, suggesting that there is much to be done to encourage healthier eating out of home. Additionally, research on the nutritional quality of food available in out of home catering in the vicinity of schools has shown these options can contrast starkly with those available within schools¹¹. Much of the food children purchase at lunchtime outside of school tends to be high in fat, salt and sugar and is often supplemented with non-diet soft drinks, confectionery and crisps. The consumption of sugar varies with level of deprivation, with those in more deprived areas consuming significantly more. This trend is seen clearly in both at a population level and in children

¹⁰ http://www.foodbase.org.uk/results.php?f_report_id=855

Is Eating out of School a Healthy Option for Secondary Pupils? A Feasibility Study to Explore the Nutritional Quality of 'Out of School' Foods Popular with School Pupils, Glasgow Centre for Population Health, 2012: http://www.gcph.co.uk/assets/0000/3539/Out_of_ school_foods_report_-final.pdf

- **30.** We recognise that implementation of this commitment could be challenging for some retailers and out of home caterers for a variety of reasons. We therefore propose options for different levels of participation to provide flexibility for businesses which would still demonstrate support. Levels of commitment might include:
- Level 1: to provide and promote individual healthy components of the meal deal;
- Level 2: to provide and incentivise healthy meal deals; and
- **Level 3:** to offer a majority of healthy meal deals.
- **31.** For those who choose to participate on this basis, businesses are encouraged to progress through the levels as and when they are able. To assist out of home caterers and retailers in identifying and selecting healthier meal options, we have provided guidance on items which could comprise a healthy meal deal in **Annex B.**

- **32.** The Scottish Government has published *Beyond the School Gate*¹² which provides guidance for local authorities, schools, retailers and caterers on how they can positively influence the food environment around schools and encourage and support school-age children to make healthier choices at lunchtime and throughout the school day.
- the opportunity to eat a healthy diet from birth. We, therefore, also encourage retailers to consider participating in the UK-wide Healthy Start scheme, which helps pregnant women and children under four from low-income families, to eat more healthily by providing free weekly vouchers to spend on milk, and fresh and frozen fruit. Free vitamin supplements are also available to those in the scheme. Further information, including details of how to register as a Healthy Start retailer, is available at http://www.healthystart.nhs.uk/

www.Scotland.gov.uk/health-beyond-the-school-gate

Offerings and promotions

Retail offerings and promotions

- **34.** In Scotland, at least three-quarters of kilocalories come from food and drink purchased in retail settings. Consumers seek value for money, especially in the current financial climate. The food and drink industry can encourage healthier choices by tailoring its standard offering and promotional activities.
- **35.** Food and drink offerings and promotions are valuable tools in encouraging sales. As such, they have enormous potential to promote a healthy balanced diet, as illustrated by the eatwell plate¹³, as well as support achievement of the Scottish Dietary Goals.
- **36.** While there are many promotional deals on healthy options like fruit and vegetables, there remains a significant amount of promotions on foods which are high in fat, salt and sugar.
- **37.** Given the overwhelming evidence of our population's overconsumption of fat, salt and sugar, which are especially worrying in children, we would like to see a greater proportion of offerings and promotions which better support healthier choices and the Scottish Dietary Goals.

9

Commitment 4

We invite retailers to rebalance their food and drink offering and promotions¹⁴, both in-store and online, to positively support consumers to make healthier choices.

- **38.** Positive promotion of the foods and drinks listed in **Annex C**, coupled with fewer promotions of high fat, salt and sugar foods, will help encourage consumers to take steps toward choosing a healthier diet. Food labelling and reformulation activity will also help to facilitate change. We invite retailers, regardless of size, within stores and across online channels, to make a corporate commitment on the proportion of their promotions which support healthier diets. There is no minimum expectation for what this proportion should be, and we hope that retailers will be ambitious and challenging in the levels they set. We will monitor the balance of food and drink promotions as detailed in paragraph 19.
- **39.** We recognise that some food and drink businesses are already taking action to increase the proportion of promotions and offers on healthier products. We welcome this activity and encourage businesses to build on this further.

http://www.eatwellscotland.org and http://eatwelleveryday.org

Offering and promotion types include (but are not limited to) price reductions (short or long term), multi-buys, meal deals and linked purchase discounts and quantity discounts (e.g. Y for £X, Buy One Get One Free, etc) that incentivise healthier purchases.

40. We recognise that changes can bring challenges for small businesses in accessing support and expertise. For this reason, the Scottish Government is committed to continued funding and support for the Scottish Grocers Federation Healthy Living Programme to assist small retailers and convenience stores. In May 2013, the Healthy Living Programme introduced a new focus on increasing the promotion of foods and drinks which support healthier diets and the Scottish Dietary Goals building on its initial fruit and vegetable promotions.

Out of home catering offerings and promotions

41. The out of home catering sector can also play an important role in shaping promotions to support healthier diets for the general population. We therefore invite out of home catering businesses, regardless of size, to take specific action to rebalance their promotional activity.



Commitment 5

We invite out of home caterers to make a corporate commitment to no longer ask customers if they wish to purchase a larger option.



Commitment 6

We invite out of home caterers to encourage healthier components in meal promotions. Guidance is provided at Annex B.



Commitment 7

We invite out of home caterers to offer water, reduced fat milk, sugar-free drinks and fruit/vegetable options as default standard meal deal components.

Marketing and advertising

- **42.** Recipe for Success first indicated our commitment to looking at potential work on food and drink marketing and advertising. This theme was picked up again in the Preventing Overweight and Obesity Route Map, which highlights the following areas:
- food packaging (use of characters, on pack promotions, sponsorship links to programmes and events)
- in-store marketing activity (product placement, value deals, sponsorship links to programmes and events, point of sale displays)
- non-broadcast media advertising (printed media, texts, outdoor, posters, cinema, video on demand, online advertisements in paid-for-space, sales promotions, links to social media sites)
- broadcast media advertising (television and radio including advertisements, product placement, programme sponsorship, prize competitions).

(4)

Commitment 8

We invite the food industry and other relevant partners to work with Scottish Government to consider how we can build upon existing practice on the responsible marketing of food and drink high in fat, salt and sugar in order to reduce children's exposure to messaging.

- **43.** In November 2011, the Scottish Government, with the Institute for Social Marketing at Stirling University, held an expert workshop, bringing together health professionals, policy makers, international experts from the WHO and the EU alongside representatives from the food and advertising industry, to look specifically at advertising and marketing aimed at children. Overall, the workshop concluded that a formal Standard provided a suitable middle-ground between regulation and self-regulation.
- **44.** Unfortunately, efforts to develop a Scottish standard on the responsible marketing of food and drink were unsuccessful. However, we welcome that all parties remain committed to engagement on this issue, especially in relation to the protection of children from marketing of food that is high in fat, salt and sugar.

- **45.** We recognise the significant steps taken by Ofcom to restrict broadcast marketing to children of foods high in fat, salt and sugar (HFSS). We also note the work the Advertising Standards Authority has done to ensure that advertising across all media does not undermine progress towards national dietary improvement by misleading or confusing consumers. We are aware that there is a considerable amount of work by industry with regard to marketing in Europe¹⁵ and recognise that several companies have made unilateral commitments to limit their marketing impact on children and this should be encouraged.
- **46.** We invite partners to work with us to consider how we can learn from, and develop, that existing practice to further reduce children's exposure to marketing of high fat, salt and sugar products. As a first step, we intend to convene a working group of key stakeholders to consider current practice, identify any gaps and consider what further practical action can be taken that will result in a meaningful and measurable reduction while ensuring that businesses maintain their competitiveness. We intend to convene the first meeting of this working group by Autumn 2014.

¹⁵ http://www.eu-pledge.eu

Supporting consumers and communities

- **47.** Supporting consumers towards making healthier choices is a shared responsibility across all of Government, the NHS, the food industry and nongovernmental organisations, including Scotland's third sector.
- **48.** The Scottish Government, FSA Scotland and NHS Health Scotland will continue to work together to provide consistent, accessible information and advice on a healthy balanced diet for Scottish consumers. The *eatwell plate* is a primary source of impartial advice about a healthy balanced diet for consumers across the UK.
- **49.** Excellent work continues on food and nutrition education for school children¹⁶. We will continue to work with Education Scotland to champion effective healthy food and nutrition resources across the education spectrum, aligning with Curriculum for Excellence. Many businesses also play an active part in health and wellbeing projects within Curriculum for Excellence.
- **50.** Staff in a range of settings, including health professionals, are well placed to encourage and support action to improve dietary health, such as those providing antenatal care, early years workers, residential socials workers and prison staff.

- **51.** Opportunities to develop cooking skills and a better understanding of food and health remain vital to help consumers access a healthy diet for themselves and their families. We will continue to work with a range of partners, including Community Food and Health Scotland, to offer hands-on cooking experiences, training and general healthy eating to a wide variety of groups in community and education settings across Scotland, for example through the *Healthier Scotland Cooking Bus*.
- **52.** We recognise that some food industry businesses are also involved in work to develop cooking skills and other community food initiatives and we welcome and support this activity.
- **53.** Training and guidance is an important route through which all businesses can improve their understanding of food and health and provide healthier options for their customers. Food and health training courses¹⁷ are widely available across Scotland and businesses are invited to consider making this training available to their staff.
- **54.** Provision of nutritional information enables consumers to make more informed decisions about the food and drink they purchase. Clear, consistent and easy to use nutrition labelling is therefore essential to support consumers to make healthier choices.

Scottish Government. Better Eating, Better Learning http://www.scotland.gov.uk/Publications/2014/03/1606

¹⁷ http://www.rehis.com/community-training

9

Commitment 9

We invite manufacturers and retailers to adopt the UK's recommended format for providing nutrition information on front of pack labelling on an ongoing basis.

55. We welcome the positive work and commitment by many food and drink businesses to voluntarily provide front of pack information to consumers, from those who have provided front of pack information for some time and from those who are now changing their labelling formats in the interests of broader consensus and for the wider population health benefit. Guidance¹⁸, is available which can help to support businesses to take forward action on labelling.

- **56.** Many large-scale high street out of home caterers are already providing energy labelling and nutritional information on menus and displays in Scotland, through wider roll-out of the UK Government's *Responsibility Deal* pledge for England. We welcome this commitment, which helps consumers to make informed decisions about their meal or snack purchases, and wish to see this become the norm across Scotland.
- **57.** There is an ongoing role for Government, the FSA Scotland and food industry businesses to raise awareness of labelling and nutritional information amongst consumers, including what it means and how to use it to help them make more informed choices¹⁹. We recognise that some food industry businesses and other partners are already taking action to raise awareness amongst consumers. We welcome this activity and invite other businesses to follow suit.



Commitment 10

We invite out of home caterers to roll-out energy and, where possible, nutritional information on menus and displays (in print and online) across Scotland on an ongoing basis.



Commitment 11

We invite food industry businesses and other relevant partners to work in partnership with Scottish Government to implement our new healthy eating social marketing campaign.

https://www.gov.uk/government/uploads/system/ uploads/attachment_data/file/207588/FINAL_VERSION_ OF_THE_2013_FOP_GUIDANCE -_WEB.pdf

¹⁹ http://www.food.gov.uk/scotland/scotnut/signposting/

- **58.** We are looking afresh at our healthy eating social marketing campaign, known previously as *Take Life On*. There is considerable potential to tie-in with local support, including supermarkets, small retailers, caterers and local community food initiatives. This campaign will focus on the real challenges faced by many consumers to eat a healthier diet. The campaign is expected to launch in January 2015.
- **59.** We will be engaging with partners over the next 6 months to discuss how we can work together in partnership to deliver the campaign. There will also continue to be opportunities to be involved with the campaign beyond January 2015.

Healthier food and drink formulation

60. Consuming excess calories, fats, salt and sugar, contributes to our increasing levels of overweight and obesity and the risk of serious conditions such as diabetes, cardiovascular disease and cancer. Therefore, our aim is to reduce both salt and calories in the Scottish diet. An accompanying background paper²⁰ is available which sets out the case for reformulation and related changes required to reduce calories and the nutrients of public health concern (fats, salt and sugar). We need to shift the balance of food and drink available towards healthier products to support healthier diets and achievement of the Scottish Dietary Goals²¹.

Salt

61. Salt reductions may be made across a wide range of food categories, in accordance with agreed UK salt targets which are set for achievement by 2017²². This sets out salt reductions across 76 separate food categories. We invite the food industry to build upon their significant achievements in relation to the 2012 targets by now working toward the new 2017 targets.

Calories

62. Reducing calories is an imperative. While we welcome the many positive contributions made by the food and drink industry with respect to reformulation,

there is still more that can be achieved. Calorie reduction, through reductions in fats and sugars in commonly consumed products, is an important public health priority. This may be undertaken in a variety of different ways and we welcome all types of activity. We have set out a number of actions that may be considered across all food and drink categories and also in relation to specific categories.

- 63. We do however recognise that for some food and drink businesses reformulation priorities can be set around a year in advance. We therefore invite businesses to take account of our aim to reduce calories and salt, as set out in this framework, to help inform their future reformulation priorities.
- **64.** Reformulation can offer immediate benefit to the consumer without requiring a change to usual food and drink intake. We understand the need to bring consumers with us and we recognise that a step by step approach is necessary. We also appreciate that it may take time for some businesses to deliver the level of change we are seeking.
- **65.** Where possible, reductions in one nutrient should not be accompanied by increased levels of other nutrients of public health concern.
- **66.** Where appropriate, consideration should also be given to the nutritional composition of budget range products to help ensure that consumers of these are not nutritionally disadvantaged.

http://www.scotland.gov.uk/Topics/Health/Healthy-Living/Food-Health/supportinghealthierchoices

http://www.scotland.gov.uk/Resource/0042/00421385. pdf

²² http://www.food.gov.uk/scotland/scotnut/salt/ saltreduction

- **67.** The actions taken will vary depending on the nature of the business. Helpful practical guidance on reformulation can be found on the IGD website²³.
- **68.** We recognise that reformulation brings specific challenges for small businesses. Therefore, by end 2014, the Scottish Food and Drink Federation, together with Scottish Government and FSA Scotland, will provide advice, including practical examples of how small businesses can contribute to our reformulation aims.



Commitment 12

We invite all food industry businesses across manufacture, retail and catering to work towards reducing calories, fats, salt and added sugars.

For example, by taking action (with a focus on standard²⁴ products) on one or more of the following:

- Reformulation of standard manufactured products
- Sourcing healthier products
- Creation of new healthier products and recipes
- Progress towards achievement of the revised salt targets
- Reductions in portion size of standard products

Calorie reduction: standard products

69. We are looking for calorie reduction as follows:

Aim:

To reduce overall calories (through reduction in fats and sugars) in standard products across a wide range of food and drink categories.

Through, for example:

- · Reductions in fats and/or sugars.
- Reductions in portion size.

Calorie reduction: specific food and drink categories

70. The following sections highlight specific categories of food and drink where reformulation is likely to have the greatest impact on public health, particularly when applied to standard or commonly consumed food and drink products within each category.

http://www.igd.com/Documents/BestPractice/Nutrition/ IGD%20Reformulation%20Guide.pdf

²⁴ Standard products refer to mainstream and most commonly purchased product ranges, it excludes lower fat, sugar or salt versions of existing products and speciality/luxury products.

Soft drinks with added sugars

71. The soft drinks industry has recently made positive changes that have increased the availability of drinks containing less added sugars. The increased use of sweeteners in standard products has contributed to this. Other welcome developments include a decrease in the overall calorie and added sugars content across product portfolios as well as increased availability of smaller portion sizes in the marketplace (e.g. single portion sizes of 250mls).

Aim:

To reduce the overall calories (through reduction in sugars) from soft drinks.

Through, for example:

- Further reductions in the sugar content of soft drinks.
- Increasing availability of smaller single serve portion sizes of soft drinks with added sugars.

Biscuits, confectionery, cakes, sweet pies and pastries

72. Many companies have made considerable progress in reformulating biscuits, cakes and pastries to meet the salt targets. Some have also made progress in reductions in saturated fat and calories. We acknowledge that there are technical challenges associated with reducing saturated fat. Practical guidance on how to reduce saturated fat in biscuits and cakes is available from Campden BRI²⁵. In addition to reducing fats, there is also opportunity to reduce sugars in some products.

Aim:

To reduce overall calories (through reduction in fats and sugars).

Through, for example:

- Further reductions in calories through reduction in fats and/or sugars.
- Decreasing portion sizes of standard products, especially where reformulation may be problematic.

²⁵ http://www.campdenbri.co.uk/news/reducing-fatcontent-baked.php

Meat pies and pastries

73. Reformulation to reduce fats in pastry can pose technical challenges. Despite this, some companies have managed to reduce calorie and saturated fat content of their products.

Aim:

To reduce the overall calories in meat pies and pastries (through reduction in fats).

Through, for example:

- Substitution of high fat fillings with additional vegetable content.
- Using less pastry.
- Reformulation of pastry, where technically possible.
- Decreasing portion size of meat pies and pastries.

Sausages and burgers

74. Some producers have developed sausages and burgers that are lower in calories and fats. We welcome this innovation, particularly within standard product ranges.

Aim:

To reduce the overall calories in sausages and burgers (through reduction in fats)

Through, for example:

- Reducing calories through reductions in fats.
- Decreasing portion sizes.

Dairy products

75. The use of lower fat milk and milk products in the marketplace is now widespread. Calorie reduction has also been achieved by reductions in fats and added sugars and by reducing portion sizes in some products. However, there is still scope for lower fat dairy products to be used more widely in the manufacture of dishes.

Aim:

To reduce overall calories (through reduction in fats and added sugars) in dairy products.

Through, for example:

- All actions to develop and make lower fat cheeses more readily available.
- All actions to reduce calories through reductions in sugars and fats in yoghurts and ice creams.
- Continued wide availability of low fat milks.
- Greater use of lower fat dairy products in the preparation and manufacture of dishes.
- Reductions in portion sizes, where appropriate.

Savoury snacks

76. The savoury snack industry has made considerable progress to reduce levels of saturated fat, predominantly by replacement with unsaturated oils and through use of alternative cooking methods.

Aim:

To reduce the overall calories through reduction in fats.

Through, for example:

- Reduction in fats.
- Greater availability of smaller single serve portions²⁶ of savoury snacks.

Calorie and salt reduction in the out of home setting

77. Out of home caterers have a key role to play in supporting our aim to reduce salt and calories in the Scottish diet, by creating recipes and sourcing products that are lower in calories, fats, salt and sugars.

Aim:

To reduce the overall calorie and salt in food and drink eaten outside the home.

Through, for example:

- Development of new lower fat, sugar and salt recipes.
- Sourcing lower fat, sugar and salt ingredients and pre-made products. Tables 1a and 1b in Annex D provide information about what constitutes high, medium and low levels of these nutrients in food and drinks and may be helpful when sourcing pre-made products.
- Sourcing ingredients and products consistent with the 2017 UK salt targets.

²⁶ Does not include multipack products

Improving kitchen practice

78. Making healthy choices when eating out of the home – at work, in cafes, quick service chains, restaurants or pubs – can go a long way to helping us eat an overall healthy diet and maintain a healthy weight. Around 15% of calories consumed come from foods and soft drinks eaten out of the home²⁷.

79. The Scottish Government's flagship, Scotland-wide catering scheme, the *HealthyLiving Award*²⁸ will remain as a key part of our broader out of home catering strategy. In April 2013, the Award moved into NHS Health Scotland. The *Award* has potential for far greater application across both public and private sectors, and its expansion is a key area of focus for NHS Health Scotland going forward.



Commitment 13

We invite out of home caterers to work towards the HealthyLiving Award on an ongoing basis.



Commitment 14

We invite out of home caterers to make small portions, as well as standard portions, available to all customers where feasible, and to ensure that soft drinks with added sugar are available in small portions of 250ml or less.

80. We encourage all out of home caterers to apply for the *Award*, from small cafes and delicatessens to supermarket restaurants and quick service chains. Companies can check the Award's applicability by contacting the Healthy Living Award Team²⁹.



Commitment 15

The Scottish Government and FSA Scotland will develop support for small out of home caterers, where it is recognised that the *HealthyLiving Award* may not be suitable, during 2014.

http://www.foodbase.org.uk//admintools/ reportdocuments/749-1-1277_S14035_Energy_Density_ Final_Report.pdf

HealthyLiving Award website: http://www.healthylivingaward.co.uk/

²⁹ http://www.healthylivingaward.co.uk/caterers/what-weare-looking-for/

- **81.** We will provide support for small out of home catering businesses, such as takeaway establishments, where we recognise the *Award* can be more challenging. Our support will help businesses towards the broad aims of the *Award*, taking steps toward full accreditation where feasible, and supporting nutritional information provision for consumers.
- 82. The public sector, and in particular the Scottish Government estate and NHS sites, should always be an exemplar in healthier food provision. The Scottish Government will set the highest standards wherever it has direct control over catering arrangements. We will also look to the broader public sector across Scotland to put in place catering provision that is healthy and nutritious, while remaining environmentally sustainable.
- **83.** The Scottish Government will publish reports annually summarising *Award* registrations and accreditations.



Commitment 16

The Scottish Government will maximise uptake of the HealthyLiving Award across the public sector. For example, we will:

- work towards 100% compliance with the more demanding Plus format of the Award across the Scottish Government estate and NHS sites, for all staff restaurants, coffee shops and on-site catering
- work with the Scottish Parliament to implement the *HealthyLiving Award* and more demanding *Plus* format across the Parliament building
- work with COSLA and local authorities to implement the basic level Award across their sites
- work with Universities Scotland and Scotland's Colleges, to implement the basic level Award across all further and higher education establishments
- promote the Award in catering specifications and within businesses around key venues for high-profile, Scottish Government-funded events
- demonstrate, through research evidence, the economic impact on businesses of the Award and its Plus format.



Commitment 17

The Scottish Government will develop and promote healthier food standards in future guidance for public sector procurement.

Summary

- **84.** This framework clearly sets out our ambition for changing the Scottish diet and firmly sets the direction of travel we believe is necessary to encourage and support healthier choices in Scotland.
- **85.** We recognise that some of the action set out in this framework will be challenging and that change will take time. Working in partnership across Government, both local and national, the food industry and the third sector will be essential if we are to realise our goals and deliver the scale of change that is required.
- **86.** With this framework, we invite food and drink industry businesses to join us on this journey. By signing up, partners can publically demonstrate their support and commit to taking specific voluntary action to support the Scottish population to make healthier dietary choices.

Supporting Healthy Choices Commitments

| | Commitment | Leads for action |
|---|--|--|
| 1 | We invite retailers and out of home caterers to take pragmatic steps to remove confectionery and sugary drinks from till points, checkout aisles and areas around checkouts. | retailers caterers |
| 2 | The Scottish Government will publish a guide for out of home caterers on healthy options for children's menus by end 2014. | Scottish Government |
| 3 | We invite retailers and out of home caterers to provide and incentivise healthier meal deals ³⁰ , especially where customers include school-age children purchasing lunch. | caterers retailers manufacturers |
| 4 | We invite retailers to rebalance their food and drink offering and promotions ³¹ , both in-store and online, to positively support consumers to make healthier choices. | retailers |
| 5 | We invite out of home caterers to make a corporate commitment to no longer ask customers if they wish to purchase a larger option. | caterers |
| 6 | We invite out of home caterers to encourage healthier components in meal promotions. Guidance is provided at Annex B . | caterers |
| 7 | We invite out of home caterers to offer water, reduced fat milk, sugar-free drinks and fruit/vegetable options as default standard meal deal components. | caterers |
| 8 | We invite the food industry and other relevant partners to work with Scottish Government to consider how we can build upon existing practice on the responsible marketing of food and drink high in fat, salt and sugar in order to reduce children's exposure to messaging. | retailers caterers manufacturers others |
| 9 | We invite manufacturers and retailers to adopt the UK's recommended format for providing nutrition information on front of pack labelling on an ongoing basis. | manufacturers retailers |

³⁰ Can include breakfast, lunch and dinner meal deals.

³¹ Offering and promotion types include (but are not limited to) price reductions (short or long term), multi-buys, meal deals and linked purchase discounts and quantity discounts (e.g. Y for £X, Buy One Get One Free, etc) that incentivise healthier purchases.

| | Commitment | Leads for action |
|----|---|--|
| 10 | We invite out of home caterers to roll-out energy and, where possible, nutritional information on menus and displays (in print and online) across Scotland on an ongoing basis. | caterers |
| 11 | We invite food industry businesses and other relevant partners to work in partnership with Scottish Government to implement our new healthy eating social marketing campaign. | retailers caterers others |
| 12 | We invite all food industry businesses across manufacture, retail and catering to work towards reducing calories, fats, salt and added sugars. | manufacturers retailers caterers |
| 13 | We invite out of home caterers to work towards the HealthyLiving Award on an ongoing basis. | caterers |
| 14 | We invite out of home caterers to make small portions, as well as standard portions, available to all customers where feasible, and to ensure that soft drinks with added sugar are available in small portions of 250ml or less. | caterers |
| 15 | The Scottish Government and FSA Scotland will develop support for small out of home caterers, where it is recognised that the <i>HealthyLiving Award</i> may not be suitable, during 2014. | Scottish Government FSA Scotland |
| 16 | The Scottish Government will maximise uptake of the HealthyLiving Award across the public sector. | Scottish Government |
| 17 | The Scottish Government will develop and promote healthier food standards in future guidance for public sector procurement. | Scottish Government FSA Scotland |

Annex A

Population Level Dietary Goals for Scotland 2013³²

| Calories | A reduction in calorie intake by 120 kcal/person/day Average energy density of the diet to be lowered to 125 kcal/100g by reducing intake of high fat and/or sugary products and by replacing with starchy carbohydrates (e.g. bread, pasta, rice and potatoes), fruits and vegetables the energy density of a food is the calorie content per unit weight of foodstuff | |
|-----------------------|---|--|
| Fruit & Vegetables | Average intake of a variety of fruit and vegetables to reach at least 5 portions per person per day (>400g per day) | |
| Oily Fish | Oil rich fish consumption to increase to one portion per person (140g) per week | |
| Red Meat | No increase in average intakes of red and processed meat Limit individual intake of red and processed meat to no more than 90g/day | |
| Fats | Average intake of total fat to reduce to no more than 35% food energy Average intake in saturated fat to reduce to no more than 11% food energy Average intake of trans fatty acids to remain below 1% food energy | |
| Sugar | Average intake of Non-Milk Extrinsic Sugars ³³ to reduce to less than 11% of food energy in children and adults | |
| Salt | Average intake of salt to reduce to 6g per day | |
| Fibre | An increase in average consumption of fibre ³⁴ to increase to 18g/day by increasing consumption of wholegrains, pulses and vegetables | |

³² These Goals set the direction and distance of travel required at a *population level*. They are *not* recommendations for individuals or groups within the population. Instead, they provide the foundation for diet and health policy development and a benchmark for monitoring and evaluation.

³³ NMES (Non-Milk Extrinsic Sugars) are also known as added or free sugars, and are found in sweets, biscuits, soft drinks, added to breakfast cereals, table sugar, honey and fruit juice. NMES do not include sugars found naturally in milk, nor are they integrally present in the cells of food such as fruit and vegetables.

³⁴ Non starch polysaccharide (NSP) as measured by Englyst method.

Annex B

Guidance on Healthier Meal Deals

The following guidelines are set with the aim of rebalancing meal deals, especially where customers include school-age children and young people. Meal deals available for breakfast, lunch and/or dinner should all be considered.

Guiding Principles:

- Meals should be based around starchy carbohydrates such as bread, potatoes, rice and pasta
- Meals should contain a portion fruit and/or vegetables
- Items included should not be high in fats, salt or sugars

Combination:

Examples of foods to include:

Note: All items included should meet the criteria set out in **Annex C**

- Sandwich (Annex C, category 28)
- Prepared salad dish that includes starchy carbohydrate (Annex C, category 27)
- Heated takeaway dish (Annex C, category 25)
- Baked potato (Annex C, category 8)
- Vegetable based soup (Annex C, category 26)
- Yogurt (Annex C, categories 20, 21)
- Portion of fruit or vegetables (Annex C categories 1, 2, 3, 4, 5, 6)
- Drinks (including full fat milk) (Annex C, categories 19, 22 and 23)
- Breakfast cereal (Annex C, category 13)
- Ready meal (Annex C, category 25)
- Frozen vegetables (Annex C, category 4)
- Whole grain bread (Annex C, category 7)
- Canned fruit (Annex C, category 2)
- Salmon (Annex C, category 14)
- Potatoes (Annex C, category 8)

| Main item | Suggested combination | | |
|---|---|--|--|
| Sandwich | Example 1 sandwich (Annex C, category 28) portion of fresh fruit (Annex C, category 1) 200ml reduced fat milk (Annex C, category 19) | | |
| Salad dish Example 2 • salad dish containing potatoes, rice, pasta or couscous (Annex C, category 27) • 150g yogurt (Annex C, categories 20, 21) • bottled water (Annex C, category 22) | | | |
| Soup and sandwich | Example 3 vegetable soup (Annex C, category 26) sandwich (Annex C, category 28) | | |
| Takeaway dish or ready meal | | | |
| Breakfast | Example 5 breakfast cereal (Annex C, category 13) reduced fat milk (Annex C, category 19) portion of fresh fruit (Annex C, category 1) | | |
| Evening meal (for home consumption) Example 6 ready meal (Annex C, category 25) frozen vegetables (Annex C, category, 4) whole grain bread (Annex C, category 7) canned fruit (Annex C, category 2) | | | |
| Evening meal (for home consumption) Example 7 • salmon filet (Annex C, category 14) • new potatoes (Annex C, category 8) • fresh vegetables (Annex C, category 1) • fresh fruit salad (Annex C category 1) | | | |

Annex C

Food and Drink Offerings and Promotions

The Scottish Dietary Goals underpin and set the direction for dietary improvement in Scotland. To achieve our goals it is important that dietary intakes are rebalanced to contain more fruit and vegetables, more foods that are rich in starchy carbohydrates and fibre, more oil rich fish, fewer calories and less fat, salt and sugar.

Positive promotion of the following foods, coupled with fewer promotions of high fat, salt and sugar foods, will help shift the balance toward a diet that better reflects our dietary goals.

| Category number and description | Guidance notes |
|---------------------------------------|--|
| FRUIT AND VEGETABLES | |
| 1 Fresh fruit and vegetables | All plain varieties, including ready prepared |
| 2 Canned fruit | Only fruit with no added sugar or syrup |
| 3 Canned vegetables | Only vegetables with no added salt or sugar |
| 4 Frozen fruit and vegetables | Only fruit and vegetables without added salt or sugar |
| 5 Beans and pulses | All plain varieties, including dried and frozen and canned without added salt or sugar |
| 6 Canned beans and pulses in sauce, | Only varieties that meet the following criteria: |
| including baked beans in tomato sauce | No more than 5g sugar per 100g |
| 34000 | No more than 0.56g salt or 225mg sodium per 100g |

| Category number and description | Guidance notes | | | |
|---|---|--|--|--|
| FOODS RICH IN STARCHY CARBOHYDRATES AND FIBRE | | | | |
| 7 Bread | All plain bread and rolls containing no more than 1.13g salt or 450mg sodium per 100g. Excludes bread and rolls with additional ingredients | | | |
| | Wholemeal bread should always be included in any bread promotion | | | |
| 8 Potatoes | All plain fresh varieties (including sweet potatoes and yams), and canned potatoes with no added salt | | | |
| 9 Oven chips and other potato products | Only chilled and frozen chips and potato products that meet the following criteria: | | | |
| | No more than 5% total fat, and require no addition of fat in preparation | | | |
| | No more than 0.69g salt or 275mg sodium per 100g | | | |
| | Excludes crisps and snacks | | | |
| 10 Grains including rice, couscous, | All plain varieties of grains | | | |
| bulgar wheat, polenta and quinoa | Excludes products with added ingredients | | | |
| 11 Pasta and noodles | All plain varieties of pasta and noodles | | | |
| | Excludes products with added ingredients | | | |
| 12 Rolled oats, oatmeal and barley | All plain varieties | | | |
| | Excludes products with added ingredients | | | |
| 13 Breakfast cereals | Only breakfast cereals that meet the following criteria: | | | |
| | No more than 10g sugar/100g | | | |
| | No more than 1.0g salt or 400mg sodium per 100g (maximum) | | | |

| Category number and description | Guidance notes | | |
|--|---|--|--|
| FISH, MEAT AND OTHER NON-DAIRY PROTEIN SOURCES | | | |
| 14 Fresh and frozen oil rich fish | All plain oil rich fish including salmon, mackerel, sardines, tuna | | |
| | Excludes smoked products and products with additions such as sauces, batters or crumbs | | |
| 15 Canned oil rich fish | All varieties that meet the following criteria: | | |
| | No more than 1.5g salt or 600mg sodium per 100g (maximum) | | |
| | Excludes canned tuna because the essential fatty acids are largely removed in the canning process | | |
| 16 Fresh and frozen white fish, | All plain white fish | | |
| | Excludes smoked products and products with additions such as sauces, batters or crumbs | | |
| 17 Fresh and frozen lean white meat | All plain products | | |
| | Excludes products with additions such as sauces, batters or crumbs | | |
| 18 Fresh and frozen vegetarian lean | All plain products | | |
| meat substitutes | Excludes products such as vegetarian sausages, burgers | | |
| | Excludes products with additions such as sauces, batters or crumbs | | |
| DAIRY PRODUCTS | | | |
| 19 Milk | Only plain skimmed, 1% and semi skimmed milk | | |
| | Excludes milk with added ingredients | | |
| 20 Plain yoghurt | All plain yoghurt containing no more than 3g per 100g fat | | |
| 21 Flavoured yoghurt | Only products containing no more than 3g per 100g fat and 10g per 100g sugars | | |

| Category number and description | Guidance notes | | | |
|---|--|--|--|--|
| DRINKS (in addition to milk) | | | | |
| 22 Water | Only plain (still and sparkling) with no added flavourings or ingredients | | | |
| 23 Sugar free drinks | Only sugar free drinks containing no more than 0.5g of sugar per 100g/ml | | | |
| | Excludes drinks containing more than 150mg caffeine per litre, where manufacturers are required to declare 'High Caffeine Content' on the packaging, in accordance with food labelling regulations ³⁵ | | | |
| | Excludes drinks based on tea or coffee extracts | | | |
| COMPOSITE PRODUCTS | | | | |
| 24 Pasta sauces | Only tomato or vegetable based sauces containing no more than 0.93g salt or 370mg sodium per 100g | | | |
| 25 Ready meals and takeaway dishes | Only products that code green or amber with respect to Front of Pack labelling criteria – see Annex D | | | |
| 26 Vegetable based soup | Vegetable and/or pulse (e.g. lentil)-based soups | | | |
| | Only products containing no more than 0.63g salt or 250mg sodium per 100g as consumed (i.e. not as dried) | | | |
| | Excludes creamed soups | | | |
| 27 Prepared salad dishes with a carbohydrate base, e.g. potatoes, pasta, rice or couscous | Only products that code green or amber with respect to Front of Pack labelling criteria – see Annex D | | | |
| 28 Sandwiches, wraps, filled rolls, | Only products that meet the following criteria: | | | |
| baguettes | contains salad/vegetables | | | |
| | no more than 400 kcals per serving/pack | | | |
| | no more than 1.5g salt or 600mg sodium per 100g per serving/pack | | | |

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 $^{^{35}\} http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02011R1169-20131206\&rid=2$

Note on 'plain'

The definition of 'plain' as applied to these products in **Annex C** excludes all additions to products, such as cheese or olives to bread, oil to rice or noodles, and syrup to tinned fruit. However, 'ready to heat' plain versions of products could be included, e.g. microwaveable rice or straight-to-wok noodles, as well as ready prepared items such as pre-chopped plain fruit and vegetables.

Annex D

Summary of Front of Pack Labelling

(also refer to Front of Pack guidance for full details³⁶)

Table 1a: Criteria for 100g of food (whether or not it is sold by volume)

| Text | LOW | MEDIUM | HIGH | |
|----------------|------------|--------------------------|-------------|---------------|
| Colour code | Green | Amber | Red | |
| Fat | ≤3.0g/100g | >3.0g to ≤17.5g/100g | >17.5g/100g | >21g/portion |
| Saturates | ≤1.5g/100g | >1.5g to ≤5.0g/100g | >5.0g/100g | >6.0g/portion |
| (Total) Sugars | ≤5.0g/100g | >5.0g to ≤22.5g /100g | >22.5g/100g | >27g/portion |
| Salt | ≤0.3g/100g | >0.3g to ≤1.5g/100g | >1.5g/100g | >1.8g/portion |

Note: Portion size criteria apply to portions/serving sizes greater than 100g

Table 1b: Criteria for drinks (per 100ml)

| Text | LOW | MEDIUM | HIGH | |
|----------------|--------------|---------------------------|---------------|----------------|
| Colour code | Green | Amber | Red | |
| Fat | ≤1.5g/100ml | >1.5g to ≤8.75g/100ml | >8.75g/100ml | >10.5g/portion |
| Saturates | ≤0.75g/100ml | >0.75g to ≤2.5g/100ml | >2.5g/100ml | >3g/portion |
| (Total) Sugars | ≤2.5g/100ml | >2.5g to ≤11.25g/100ml | >11.25g/100ml | >13.5g/portion |
| Salt | ≤0.3g/100ml | >0.3g to ≤0.75g/100ml | >0.75g/100ml | >0.9g/portion |

Note: Portion size criteria apply to portions/serving sizes greater than 150ml

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/207588/FINAL_VERSION_OF_THE_2013_ FOP_GUIDANCE_-_WEB.pdf



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