

Healthy Futures

A Strategic Framework to Prevent the Harm caused by
Obesity, and Improve Diets and Levels of Physical
Activity in Northern Ireland

Consultation Questions

November 2023

Overview

Consultation to seek views on Healthy Futures Strategic Framework to Prevent the Harm caused by Obesity, and Improve Diets and Levels of Physical Activity in Northern Ireland

Consultation opened on Friday 24 November 2023.

Consultation closes on Friday 16 February 2024 at 17:00.

Summary

The Department of Health has worked with key stakeholders to co-produce a new strategic framework to reduce the harm related to living with overweight and obesity in Northern Ireland.

Consultation Description

The new strategic framework for obesity – “**Healthy Futures**” – was issued for public consultation on 24 November 2023 and is available online at <https://www.health-ni.gov.uk/publications/consultation-obesity-strategy-healthy-futures>

How to Respond:

You can respond online by accessing the consultation documents on the ‘Citizen Space’ web service and completing the online survey there. The online version can be accessed at <https://consultations2.nidirect.gov.uk/doh-1/healthy-futures-consultation-2023-2032/>.

To respond in writing, please email the Department at: HDPB@health-ni.gov.uk or write to:

Health Development Policy Branch
Department of Health
Room C4.22, Castle Buildings
BELFAST BT4 3SQ

Next Steps

Following this consultation, we will collate and analyse all views and inputs, and begin the process of developing the final strategy. This will need to be agreed by the Minister of Health and the NI Executive before being published. It is important to note that AFFFA – and all the structures that support action and collaboration – will remain in place until any new strategy is put in place.

The Closing Date for responses is Friday 16 February 2024 at 17:00

Your details

Name: Emily Bishko
Email: emilybishko@cancerfocusni.org
Are you responding as an individual or organisation?
Individual <input type="checkbox"/>
Organisation <input checked="" type="checkbox"/>
Name of organisation if appropriate: Cancer Focus Northern Ireland

Screening

The strategic framework has been equality and rural screened to consider impacts on this important group. These documents are available at <https://www.health-ni.gov.uk/publications/obesity-strategy-2023-2033-rnia-and-eqia-0>.

CONSULTATION QUESTION 1 – SCREENING:

Have you any comments on either the Equality/Good Relations or Rural screening documents?

No additional comments

CONSULTATION QUESTION 2 – SCREENING:

Are there any areas or issues you feel we should be considering in future Equality/Good Relations or Rural screenings?

No additional comments

Vision, Principles, Outcomes, Thematic approach

CONSULTATION QUESTION 3 – VISION: the overall vision for this new strategic framework is to “*create the conditions in Northern Ireland which enable and support people to improve their diet and participate in more physical activity, and reduce the risk of related harm for those living with overweight and obesity*”.

Do you agree with this vision?

Strongly agree:

Agree:

Disagree:

Strongly disagree:

Comments:

We believe this vision captures the reasons for and main mechanisms of this framework. We especially appreciate the focus on creating “conditions in Northern Ireland” to achieve these goals.

CONSULTATION QUESTION 4 – PRINCIPLES: The project board proposed a range of principles for the development and implementation of the new strategic framework, these are; taking **whole system approach** with the framework being **health led but not solely health owned**, taking a **life course approach** and targeting or prioritising certain groups, focusing on reducing **inequalities**, acknowledging the **alignment with other policy areas** and not duplicating effort, being **outcome-based**, and that the framework will provide an **umbrella for actions to prevent and address overweight and obesity**.

Do you agree with these principles?

Strongly agree:

Agree:

Disagree:

Strongly disagree:

Comments:

We welcome the consultation on the Strategic Framework to Prevent the Harm caused by Obesity and Improve Diets and Levels of Physical Activity and the principles which have been laid out in the consultation document. We agree this strategy requires a whole-system approach and support the identified principles.

There are some areas that might require greater focus. This includes addressing the promotion of early years prevention by providing education to children on dietary information. This also includes targeted intervention to specific groups such as education and awareness raising to those from a minority ethnic background, and the impact poor diets will have on their life. This could involve providing culturally tailored awareness campaigns and partnerships with children's health organisation to promote obesity prevention programmes.

We also feel there needs to be an educational awareness programme to increase awareness of nutritional information across all foods. This is an issue which impacts on everyone in society, and the need to explain and educate in more easily understood terms how their diet choices can impact upon their lives.

We support the inclusion of reducing health inequalities as a key principle within the strategy, and we call on measurable outcomes to be monitored and delivered. More generally, we believe there should also be regular updates on delivering against targets within the outcomes to ensure the strategy delivery is accountable. This should also include specific outcome targets for each department and statutory partner.

We would also be grateful if further information was provided on the role each department will play in the implementation of this important strategic policy. While the consultation principles note this will be cross departmental, there is no clear indication of the role each department will play in the delivery phase. It is essential that each Department has a clear allocation of responsibilities and duties within the Strategy. We would also be keen to understand the budget which will be allocated for each action and for ongoing implementation.

Finally, we note that efforts to raise awareness that there is more to “healthy living” than just diet and exercise, although these are important. We hope that opportunities to raise awareness of diet and exercise could leverage synergies, as reasonable, to also advocate for no smoking and for UV awareness. Together, having a healthy diet, regular activity, not smoking, and being UV aware can greatly reduce cancer risks.

CONSULTATION QUESTION 5 – OUTCOMES: This strategic framework focuses on four main long-term population level outcomes across the life course: Reducing the percentage of people in Northern Ireland who are living with overweight and/or obesity; Improving the population’s diet and nutrition; Increasing the percentage of the population who participate in regular physical activity; and Reducing the prevalence of overweight and obesity-related Non-Communicable Diseases (NCDs).

Do you agree with these 4 population level outcomes?

Strongly agree:

Agree:

Disagree:

Strongly disagree:

Comments:

We agree with the outcomes which have been developed in this consultation document, and welcome the commitment to reduce the prevalence of overweight and obesity-related non-communicable diseases (NCDs). Obesity can contribute to or exacerbate diseases including type 2 and gestational diabetes, cancer, heart disease, and more. We support tracking toward these outcomes to create accountability for the implementation of this Strategy and to provide insight into key gaps.

We would welcome more information on the collation and use of data and how this will be used to understand the picture fully. This includes improving the collection of paediatric obesity data and the inclusion of BMI data gathering. This should be a priority as the annual health survey has not had BMI related questions since 2019/20 and the National Child Measurement programme for primary 1 and year 8 measurements has been paused since 2018/19.

Without sufficient data collection, the implementation and monitoring of progress will be extremely difficult. Additional data collection will improve the accountability and overall outcomes of the strategy.

There is a need to include measurements of the socio-economic gaps/levels of health inequalities and how they have been closed over the lifetime of the strategic framework. This will allow for the measurable outcome to determine the success of the strategy.

An inclusion within the outcomes of who has responsibility for the delivery of the framework and actions they will be taking will enable accountability of delivery. The outcomes should also include a governance framework across each of the departments and outline what they will be responsible for delivering. The strategic framework should also include dates for regular review and clear accountability structures to ensure the strategic framework is accountable with strong governance structures in place.



CONSULTATION QUESTION 6 – THEMATIC APPROACH: The strategic framework takes a thematic approach to the issues focusing on four key themes: Health Policies, Health Places, Healthy People, and Collaboration and A Whole System Approach.

Are all the key areas covered within this thematic approach?

Yes: X

No:

Comments:

We welcome the thematic approach which has been developed by the Department in this consultation exercise and appreciate the identification of policies, places, and people as relevant focuses. These themes are important to making sure the strategy not only impacts those that already have obesity, but that it can help prevent obesity across NI through awareness building and access to care.

We also think a governance structure (e.g., responsibilities, outcomes/targets) could help clarify how the different departments contribute to each theme. Without clear governance, we fear the strategy will remain unrealised due to ambiguity of responsibility and accountability structures.

It might also make sense to include health inequalities as an additional theme, although since these are a principle, they could be seen to fall under all the themes.

Each theme should also clearly show how it will support those from the most deprived areas, for example neighbourhood renewal areas, and the interventions which will be developed to target them. This should include increased education on food labelling to ensure people understand how this can impact upon their diets and health outcomes. By ensuring people are provided with the correct education you will ultimately help to reduce inequalities, which should underpin the whole strategic framework.

Healthy Policies

CONSULTATION QUESTION 7 – HEALTHY POLICIES: Our ability to eat a healthy diet, participate in physical activity, and to maintain a weight that is good for our health, is very much influenced by the wider environment in which we live our lives. This theme focuses on the strategies, policies, regulations and stakeholders that control the wider food and physical environment, therefore playing a key role in addressing the obesogenic environment.

Do you agree with this theme and what it is seeking to achieve?

Strongly agree:

Agree:

Disagree:

Strongly disagree:

Comments:

We welcome this theme and appreciate the recognition of how policies can shape lifestyles. Policies that orient to supporting access to healthy behaviours (e.g., food, activity) are essential to facilitating these habits.

While it is welcome that the Department have included addressing the obesogenic environment within this policy, there are issues, such as advertising and food labelling, which may require an intervention at Westminster. We would welcome further information on how the Department will work with the UK Government to ensure these policy changes can be implemented.

There are practical changes which can be made within settings, including restriction of price promotion and the introduction of Minimum Unit Pricing. This will support the reduction of NCDs.

Local Government has a role to play in the delivery of this policy, in ensuring people have access to safe spaces for physical activity. Their role should be defined within the delivery of this strategic framework. Additionally, each council will have set their own priorities through their community planning process, and ensuring this strategic framework can support the delivery of their outcomes will be a key to success.

We recognise that the current and ongoing cost of living crisis is having an impact on wider social and particular health outcomes. However, we would have some concern that using the excuse of 'unintended consequences' could give rise to the hollowing out of measures to improve Healthy Policies.

Healthy policies do not have to be an economic cost, and such intervention like the use of Buy One Get One Free promotions could targeted at healthier options rather than ultra-processed foods or products high in sat, salt and sugar.

As mentioned above, there could be practical changes to food labelling, coupled with an education programme, which makes it easier for people to understand the food choices they can make.

There are several policies and strategies which have a role to play within the delivery of the strategic framework including the NI Cancer Strategy 2022-2032, Maternity Strategy, Healthy Child Healthy Future, Mental Health Strategy and Tobacco Control Strategy.

We would welcome further information on how the strategic framework will be linked to the previously developed policies and strategies and how the governance structures will be developed to ensure accountability and delivery.

CONSULTATION QUESTION 8 – HEALTHY POLICIES:

Do you agree with these priorities?

Strongly agree:

Agree:

Disagree:

Strongly disagree:

Comments: Food environment priorities

Food environment priorities should include the provision of clear information on the food choices people make. This is linked to the promotion of easily understood food labelling and healthier food options.

Comments: Food labelling and information priorities

Food labelling and information should be provided in an easily understood format, coupled with a greater level of education for the general public. There should also be a requirement placed upon the Department of Education to ensure children are provided with education on how to understand food labelling and how it will impact upon children throughout their life. Additionally, food labelling should become more regulated, with a system in place to ensure industry adheres to guidelines.

Comments: Healthier food options priorities

Healthier food options should be prioritised and made accessible. This includes prioritising healthier food options within the education sector, which can ensure those who have access to the free school meals programme are provided with regular healthy meal options. This will ensure those from an area marked by health inequalities are provided with a healthier diet. However, the issue of holiday hunger will have an impact, and funding should be provided in the longer term to help tackle this societal issue.

Comments: Physical activity and active travel priorities

There is a role for local government and the Department for Infrastructure to play in the promotion of physical activity and active travel. This strategic framework needs to link in with the policies developed in this area to ensure people have access to safe spaces for physical activity and active travel.

CONSULTATION QUESTION 9 – HEALTHY POLICIES:

Is there anything missing that is likely to have a positive impact on this theme and what it is trying to achieve?

Comments:

How this strategic aim will link in with the already developed strategies and policies should be displayed within this strategic framework. There should be examples of the governance structures in place. There is also a need to show what can be taken forward by the Northern Ireland Assembly and how the departments will work with the UK Government on issues which are not devolved, such as advertising.

The healthy policies around food should also extend to beverages (e.g., sugary drinks), which can also contribute to obesity.

Healthy Places

CONSULTATION QUESTION 10 – HEALTHY PLACES: At all ages, we can spend a significant portion of our lives in places and settings that influence our ability or inability to eat healthily, be physically active and to manage our weight. This can be through a lack of access to opportunities, barriers to participation and lack of availability. However, settings can also play a positive role in supporting the health and wellbeing of the people who access them. This theme focuses on creating supportive places and settings.

Do you agree with this theme and what it is seeking to achieve?

Strongly agree:

Agree:

Disagree:

Strongly disagree:

Comments:

We welcome the commitment on healthy places, however we are concerned about how this will be governed. Given the high number of stakeholders who would be involved in the delivery of this outcome, strong governance structures, with clear targets would need to be set from the beginning.

Additionally, there will be a requirement to put in place funding structures to support programmes such as holiday hunger payments to those entitled to free school meals, and provision of physical activity programmes.

CONSULTATION QUESTION 11 – HEALTHY PLACES:

Do you agree with these priorities?

Strongly agree:

Agree:

Disagree:

Strongly disagree:

Comments: Early years settings priorities

Early years settings will be key to developing lifelong learning to support tackling obesity. The need for cross departmental working on this issue will be key to ensuring the long-term success of the strategic framework.

Comments: School settings priorities

As with early years settings, the school setting should ensure pupils are able to access healthy food and physical activity programmes. An education programme should also be developed to ensure pupils are provided with an understanding of food labelling and making informed choices on their health and wellbeing.

Comments: College, university, and workplace settings priorities

The Department for the Economy will have a role to play in supporting this strategic framework being a success. Within the college and university setting there should be provisions made to promote healthy alternatives and physical activity programmes.

The Department for the Economy should also use their channels to promote healthy alternatives to employers and providing them with information for employers on how they support employees to make healthier choices.

We are also concerned about the role alcohol can have in these environments (e.g., among colleagues or classmates after hours), given it is a caloric beverage also with ties to obesity and cancer.

Comments: Healthcare settings priorities

Healthcare settings should abide by the principles laid out within the consultation document and ensure they play a full role in the delivery of the strategic framework. Healthy places in healthcare settings are important to both staff (to maintain health) and patients (to support recovery as best possible).

Comments: Local government and community settings priorities

Local government and community settings have a key role to play in the delivery of this strategic framework. They should be providing physical activity programmes to support the improvement of the health of the general population.

CONSULTATION QUESTION – 12: HEALTHY PLACES:

Is there anything missing that is likely to have a positive impact on this theme and what it is trying to achieve?

Comments:

When looking at healthy places regarding obesity and activity, all healthy living components should be included and integrated. For example, shade structures (for UV protection) should be included.

There is also an active role for the Department for Infrastructure to consider accessibility to health services (including those related to obesity management and prevention) via transport links.

Healthy People

CONSULTATION QUESTION 13 – HEALTHY PEOPLE: As well as amending the wider policy and legislative environment and ensuring that a range of settings support people to be healthy, this theme therefore focuses on the need to help, support, and enable people to prevent poor health and wellbeing, to provide early interventions for those who may need additional help, and to provide appropriate treatment and interventions which seek to reduce the harm to those who may be living with overweight and obesity.

Do you agree with this theme and what it is seeking to achieve?

Strongly agree:

Agree:

Disagree:

Strongly disagree:

Comments:

Prevention should be a key theme within the Healthy People outcome, ensuring that targeted interventions are available. This would include an increased role for the Public Health Agency to support an overall educational approach to ensure people have a greater understanding of issues such as food labelling and physical activity. Healthy diets and regular physical activities help prevent against obesity and also some cancers.

There should be targeted social prescribing of physical activity within the education sector, which could include continued promotion of activities such as the daily mile and couch to 5k. Focus should also be placed in programmes such as the HENRY Early Years Obesity Programme for those aged 0-5 years, which is funded by the Public Health Agency.

This strategic framework also needs to work in conjunction with the already developed policies and strategies, such as the tobacco control strategy, which will ensure people make healthier life choices and are aware of the health implications of these lifestyle choices.

Key to the delivery of this outcome will be ensuring there are governance and accountability measures in place, alongside funding provision, to ensure the outcome can be achieved.

CONSULTATION QUESTION 14 – HEALTHY PEOPLE:

Do you agree with these priorities?

Strongly agree:

Agree:

Disagree:

Strongly disagree:

Comments: Pregnancy and early years priorities

We agree that pregnancy and early years should be included as a priority, to facilitate life-long healthy habits.

Comments: Prevention and awareness programmes priorities

We strongly support prevention and awareness programmes to help people prioritise healthy living, which can help protect against obesity, some cancers, and other diseases.

The Community and Voluntary (Third) Sector also provide crucial support in this area, such as by raising awareness of the risks of obesity and in promoting healthy living. For example, the Cancer Focus NI Keeping Well service provides in-community health checks and programmes, which can help bring services to hard-to-reach areas. These are opportunities to discuss cancer risks and to offer guidance on health living, including on diet, physical activity, stop-smoking, and UV awareness. We also provide body composition checks.

In light of these activities, we encourage third sector support to allow charities and other organisations to continue providing these important services.

Comments: Weight management services priorities

We agree that weight management services should also be included as a priority for those that need them, in addition to preventative efforts.

CONSULTATION QUESTION 15 – HEALTHY PEOPLE:

Is there anything missing that is likely to have a positive impact on this theme and what it is trying to achieve?

Comments:

Points 3-5 of the European Code Against Cancer do a good job linking together activity, diet, and cancer risk and could help model an approach to promoting healthy living. As indicated by this Code, having a healthy weight, regular physical activity, and a healthy diet can all reduce cancer risks.

There is also a need to continue supporting cancer and other patients post-diagnosis and treatment. This is another area in which we and other charities provide services. If supported, there could be an opportunity to create individualised wellbeing services, which could include weight management.

Collaboration and Whole System Approach

CONSULTATION QUESTION 16 – Collaboration and a Whole System

Approach: Overweight and obesity is complex and interrelated with other issues and outcomes. It is vital therefore that this strategic framework is a living document which is regularly updated in line with the latest international research and evidence, that we work collectively across the UK and Ireland, and that we enable people to come together to find solutions and take a systematic approach to achieving our goals.

Do you agree with this theme and what it is seeking to achieve?

Strongly agree:

Agree:

Disagree:

Strongly disagree:

Comments:

For this strategic framework to be a success, there is a need for governance and accountability structures to be in place. There is a need to understand the role each department and statutory partner will play in ensuring delivery against outcomes. Without these structures being in place from the beginning, it is possible that outcomes will not be achieved.

We welcome that the strategic framework will be a living document, which is regularly updated, but feel there should be regular accounting and outcomes placed across the lifespan.

We would also welcome funding requirements being outlined in a costed approach, which will ensure that this document will receive the budgetary priority which is required.

As a cross-departmental framework, this should also be a flagship policy for an incoming Executive. This is due to the economic, societal and health implications obesity has across all areas of the population. By making it an Executive priority this will ensure that this strategic framework will receive the recognition it requires.

The Department should be linking between different strategies that promote healthy living, e.g., an obesity strategy, the cancer strategy, a skin cancer prevention strategy, and the tobacco control strategy. There should be an implementation group to realise this work and hold it to account.

CONSULTATION QUESTION 17 – Collaboration and a Whole System

Approach: Do you agree with these priorities?

Strongly agree:

Agree:

Disagree:

Strongly disagree:

Comments: Whole System Approach and collaboration priorities

The collection and use of data across all departments who have a role to play will allow for outcomes to be more measured and to determine if they have been achieved. Data will also provide an evidence base for the starting point of this strategic framework, and can determine if measures are having an impact at times of review or if a more targeted approach will be required to achieve outcomes.

CONSULTATION QUESTION 18 – Collaboration and a Whole System

Approach: Is there anything missing that is likely to have a positive impact on this theme and what it is trying to achieve?

Comments:

There are a number of issues which need to be addressed following this consultation. These include:

- What role will each department have in the delivery of outcomes?
- What are the governance structures which will be put in place to ensure targets and outcomes are delivered?
- How will this strategic framework be funded?
- What role will the Public Health Agency and other statutory partners have in the delivery of this strategic framework?
- The strategic framework should be evidence driven across each department.

We also note that the community and voluntary (third) sector deliver a lot of the work related to awareness raising, health checks, and patient support. We require support and funding to continue providing these services across NI.

Thank you

Thank you for completing the consultation. We are keen to hear a wide range of views and ideas to make our new strategy, and proposed interventions, even better targeted at the factors that will make the most positive difference.

You may also be interested in the Department's consultation on a Proposed Regional Obesity Management Service (ROMS) for Northern Ireland which is running at the same time as this consultation. Details are available online at <https://www.health-ni.gov.uk/consultations/proposed-regional-obesity-management-service-roms-northern-ireland>.