

## **RCN response to consultation on the introduction of further advertising restrictions on TV and online for products high in fat, sugar and salt (HFSS)**

### **1. Introduction**

- 1.1. The Royal College of Nursing (RCN) welcomes this opportunity to respond to the Department of Health and Social Care and the Department for Digital, Culture, Media & Sport consultation on the introduction of further advertising restrictions on TV and online for products high in fat, sugar and salt (HFSS).
- 1.2. Rather than responding to all of the individual questions in the consultation questionnaire, below we outline the RCN's view on childhood obesity and the case for enhancing restrictions on advertising. We then set out our support for the two specific proposals within the consultation to extend advertising restrictions for products high in fat, sugar and salt (HFSS) on both TV and online.

### **2. The RCN view on childhood obesity as a major public health issue**

- 2.1. The RCN agrees with the Government that childhood obesity is a serious and pressing public health challenge requiring urgent and meaningful action. As highlighted in a study by the Nuffield Trust, the UK has considerably more overweight or obese children than the average amongst high income countries<sup>1</sup>.
- 2.2. Nursing and midwifery staff are aware of obesity as a major issue, across the UK. In working with children, families and communities across all services and sectors, they play a key role in identifying those at risk from weight gain and offering advice and support to help people achieve a healthy weight and adopt healthy lifestyles.
- 2.3. Health Visitors and School Nurses are universal children's public health services which have broad ranging contacts with children and families in homes, schools and communities. Health visitors are involved with children and families from pregnancy, through infancy and early childhood and school nurses are involved with children from 5-19 years old. They therefore have a particularly important role to play in supporting children and young people to adopt healthier eating and lifestyles.
- 2.4. There are a number of contributing factors which cause obesity, and no singular intervention will resolve this issue. Therefore tackling obesity will require a broad multi-sectoral approach rooted in evidence. Investing in and strengthening preventative and public health services, such as obesity

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<sup>1</sup> Cheung, R (2018) International comparisons of health and wellbeing in early childhood, Nuffield Trust <https://www.nuffieldtrust.org.uk/research/international-comparisons-of-health-and-wellbeing-in-early-childhood>

clinics, but also health visiting, school nursing and other health promotion and public health services, is vital.

2.5. However, across England, these services are facing cuts, pressure and uncertainty as a result of cuts to public health funding and the broader financial pressures facing local authorities. As we have highlighted, health visitors and school nurses play a vital role in promoting health and wellbeing with children and families. The health visiting workforce continues to experience significant reductions - NHS posts in England dropped from 10,309 in October 2015 to 7,694 in January 2019. Likewise the number of full-time school nurses employed by the NHS in England fell by over a quarter between March 2010 and January 2018.<sup>2</sup>

2.6. Sufficient and sustained investment in public health and prevention must be core to the Government's approach to tackling childhood obesity.

2.7. The cuts to the public health nursing workforce cuts must be situated within the broader context of the nursing workforce crisis, with around 40,000 vacant nursing posts in the NHS in England alone and potentially thousands more outside of the NHS. Across the UK, urgent investment is needed to ensure that we have the right number of nurses in the right places at the right time to keep people safe. In England the RCN is calling on the Government to invest at least £1bn annually into growing the supply of nurses through the nursing higher education route, via tuition fee and maintenance support for an additional 24,000 nurses over five years. Additionally, we are calling for growth via the postgraduate degree route, and hardship support for those who need it.

### **3. The RCN view on the case for enhancing advertising restrictions**

3.1. Evidence demonstrates that there is a clear link between the food and drink adverts that children are exposed to and their food choices and how much they eat, with children being particularly vulnerable to brand recognition and preference from as early as 18 months of age.<sup>3</sup> Analysis undertaken by Boyland et al. (2016) looking at the effects of acute exposure to unhealthy food and non-alcoholic beverage advertising found that acute exposure to food advertising increases food intake in children.<sup>4</sup> Furthermore, a recent study by Cancer Research UK demonstrated that TV marketing is a consistent risk factor for unhealthy eating and drinking. The study showed that children and young people with high TV exposure were 1.9 times more likely to consume 2 or more sugary drinks per week and 1.8 times more

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<sup>2</sup> NHS Digital NHS Workforce Statistics January 2019 (published April 2019)

<sup>3</sup> PHE (October 2015) Sugar Reduction: the evidence for action  
<https://www.gov.uk/government/publications/sugar-reduction-from-evidence-into-action>

<sup>4</sup> Boyland EJ, Nolan S, Kelly B, Tudur-Smith C, Jones A, Halford JCG, Robinson E (2016) Advertising as a cue to consume: a systematic review and meta-analysis of the effects of acute exposure to unhealthy food and nonalcoholic beverage advertising on intake in children and adults.

likely to consume 1 or more takeaways per week. People with high advert exposure were around 2.7 times more likely to have high total HFSS consumption.<sup>5</sup>

3.2. We share the Government's concern that despite existing restrictions, children are still too exposed to advertising for products that are high in fat, sugar and salt (HFSS) through the media. This in turn influences their food choices and can contribute to obesity. The RCN believes that introducing enhanced restrictions on the advertising for HFSS products is a welcome step towards the Government's target of halving childhood obesity by 2030 and will help to reinforce the work that nurses, midwives and nursing support staff are doing to tackle obesity and promote health and wellbeing.

#### **4. The RCN view on the specific consultation proposals:**

4.1. The RCN believes that all children should be protected from the advertising of unhealthy products. Therefore we support the following proposals from the Government's consultation:

4.2. We support option 1: The introduction of a 9pm – 5:30am watershed on broadcast TV. We believe that this is the most effective way to reduce children's exposure to food and drink marketing.

4.3. Furthermore, in line with the Obesity Health Alliance view, we support the use of the Nutrient Profile Model as the most effective, evidence based tool to define HFSS adverts.

4.4. The RCN also supports option 1: The introduction of a 9pm – 5:30am watershed online. We believe this will also be the most effective option for reducing children's exposure to food and drink marketing.

4.5. We would also support enhanced advertising restrictions across a broader range of media which includes those listed in the consultation document (cinema, radio, print, outdoor, direct marketing).

4.6. In terms of implementation, to avoid displacement of HFSS advertising from one type of media to another, we support the proposal to introduce the enhanced restrictions to broadcast and online media simultaneously.

#### **About the Royal College of Nursing**

With a membership of around 435,000 registered nurses, midwives, health visitors, nursing students, health care assistants and nurse cadets, the Royal College of Nursing (RCN) is the voice of nursing across the UK and the largest professional union of nursing staff in the world. RCN members work in a variety of hospital and

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<sup>5</sup> Thomas C, Hooper L, Petty R, Thomas F, Rosenberg G, Vohra J (2018). 10 years on: New evidence on TV marketing and junk food consumption amongst 11-19 year olds 10 years after broadcast regulations. Cancer Research UK, available from: [http://www.cancerresearchuk.org/sites/default/files/10\\_years\\_on\\_full\\_report.pdf](http://www.cancerresearchuk.org/sites/default/files/10_years_on_full_report.pdf)

community settings in the NHS and the independent sector. The RCN promotes patient and nursing interests on a wide range of issues by working closely with the Government, the UK parliaments and other national and European political institutions, trade unions, professional bodies and voluntary organisations.

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**Policy and Public Affairs UK and International**  
**Royal College of Nursing**  
**May 2019**