

Freedom of Information Request on the Healthy Eating Campaign from Food Standards Scotland (September 2016), specifically the 2 broadcast advertisements for TV, you tube and social media (please provide details on each advert separately).

1. What scientific, nutritional and social research was used in planning and developing the Healthy Eating campaign and specifically the 2 broadcast TV adverts? Which research, in particular, supports the FSS blaming/shaming approach as a better means of changing behaviour than positive reinforcement?

Scientific Advisory Committee on Nutrition (SACN) on carbohydrates and health report

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445503/SACN_Carbohydrates_and_Health.pdf

Commons Health Select Committee report

<http://www.publications.parliament.uk/pa/cm201516/cmselect/cmhealth/465/465.pdf>

Food Standards Scotland *The Scottish Diet: It Needs to Change* (Dec 2015) and all references cited therein

<http://www.foodstandards.gov.scot/scottish-diet-it-needs-change>

Eatwell Guide from Public Health England, Food Standards Scotland, Welsh Government and FSA NI

<http://www.foodstandards.gov.scot/nutrition-healthy-eating/eating-healthily/using-eatwell-guide>

Scottish Government *Supporting Healthy Choices* framework document

<http://www.gov.scot/Resource/0045/00454204.pdf>

<http://www.independent.co.uk/news/uk/home-news/obesity-now-seen-as-normal-by-society-warns-chief-medical-officer-9219466.html>

Food Standards Scotland *Attitudes to Diet and Health in Scotland* survey, Scott Porter, 2015

<http://www.foodstandards.gov.scot/sites/default/files/Attitudes%20to%20Diet%20and%20Health%20in%20Scotland%202015%20Report.pdf>

Kantar Worldwide panel data (April 2015)

<http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=9&cad=rja&uact=8&ved=0ahUKEwinttgXutrPAhXKPRoKHUJcAC8QFghNMAg&url=http%3A%2F%2Fwww.ka>

ntarworldpanel.com%2Fdwl.php%3Fsn%3Dnews_downloads%26id%3D286&usg=AFQjCNHlsxDLn10xqRebcA6KpsmOzgCugw

Diabetes risk tool

<http://riskscore.diabetes.org.uk/start>

European Congress on Obesity Research (May 2012)



CLINICAL REVIEW - American Society for obesity-and-womens-Reproductive Medicin

<http://www.nhs.uk/Conditions/Infertility/Pages/Causes.aspx>

http://www.asrm.org/factsheet_weight_and_fertility/

<http://www.telegraph.co.uk/news/health/news/9252076/Obese-women-more-likely-to-become-pregnant-if-they-lose-weight-research.html>

Wansink, Brian (Cornell University), *Slim by Design* and *Mindless Eating*

'Follow the Families' qualitative research for Food Standards Scotland Healthy Eating Campaign by ICM Unlimited.

2. What was the timeline for the campaign from conception and planning to launch?

January 2015 – Healthy Eating campaign agreed as part of Food Standards Scotland's Communications and Marketing Strategy 15/16

December 2015 – Brief issued

September 2016 – Campaign launched

3. Who were the FSS staff with direct responsibility for and involvement in the campaign?

An exemption under section 38(1)(b) of FOISA (personal information) applies to all of the information requested because it is personal data of a third party, ie names of individuals, and disclosing it would contravene the data protection principles in Schedule 1 to the Data Protection Act 1998. This exemption is not subject to the 'public interest test', so we are not required to consider if the public interest in disclosing the information outweighs the public interest in applying the exemption.

4. Which professional experts in health, nutrition, and medicine were asked for input in developing the campaign, and each of the broadcast adverts?

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5. Which representational charities (Obesity, Infertility, Type 1 & 2 Diabetes, Heart) were asked for input in developing the campaign, and each of the broadcast adverts?

None. The objective of the campaign is to highlight several of the well-known, established and well-evidenced health risks associated with poor diet and obesity, and Food Standards Scotland has its own team of diet and nutrition policy experts who are in regular contact with a variety of stakeholders, including charitable bodies.

6. What were the selection criteria for those involved in developing the campaign and those involved in focus groups/screening the pilot adverts? Were any of them diabetic/obese/infertile? If not, why not?

Those involved in developing the campaign include:

- Food Standards Scotland communications and marketing professionals.
- Food Standards Scotland diet and nutrition science and policy experts.
- Agencies appointed under the Scottish Government Marketing Communications Framework Agreement.

Criteria for members of the public involved in individual interviews and focus groups included family status (parents of children aged 2-15) and body mass index. Research participants were all either technically overweight or obese, or had a partner who was technically overweight or obese. Neither diabetes nor infertility were selection criteria, however, two participants were diabetic.

7. How were the participants in the pre-campaign research sourced and mined for opinions?

Participants were recruited by a professional market research recruitment specialist. Participants in the pre-campaign research were interviewed in two formats: in their homes in family groups and/or as part of a focus group.

8. What were the details of the feedback from focus groups and the questions they were asked in preparing each of the broadcast adverts.

An exemption under section 38(1)(b) of FOISA (personal information) applies to a small amount of the information requested because it is personal data of a third party, ie photographs and/or names of individuals, and disclosing it would contravene the data protection principles in Schedule 1 to the Data Protection Act 1998. This exemption is not

subject to the 'public interest test', so we are not required to consider if the public interest in disclosing the information outweighs the public interest in applying the exemption.

An exemption under section 33(1)(b) of FOISA (commercial interests) also applies to some of the information requested. This exemption applies because disclosure of this particular information would, or would be likely to, prejudice substantially the commercial interests of The Union Advertising Agency and/or ICM Unlimited. Disclosing this information would be likely to give The Union Advertising Agency and/or ICM Unlimited's competitors an advantage in future similar tendering exercises, which would substantially prejudice The Union Advertising Agency and/or ICM Unlimited's ability to submit competitive tenders and so could significantly harm their commercial business.

This exemption is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exemption. We have found that, on balance, the public interest lies in favour of upholding the exemption. We recognise that there is a public interest in disclosing information as part of open and transparent public body, and to help account for the expenditure of public money. However, there is a greater public interest in protecting the commercial interests of companies which enter into Food Standards Scotland contracts, to ensure that we are always able to obtain the best value for public money.

Therefore, this information has been redacted from the documents relating to the qualitative research enclosed:

- Discussion guide for insight gathering
- Discussion guide for creative testing
- Debrief on results of insight gathering
- Debrief on results of creative testing

9. Who led the discussions/research with the target audience focus groups?

The two stages were led by researchers from an independent market research organisation – ICM Unlimited – which is professionally accredited by the Market Research Society and experienced in qualitative research for government and health organisations.

10. What was their background and qualifications to do so?

The researchers are professionally accredited by the Market Research Society and have a combined total of 29 years' professional qualitative research experience with some of the UK's leading firms. The lead researcher runs and convenes training courses for the Association of Qualitative Research. Researchers abide by the Market Research Society Code of Conduct.

11. What additional scientific research was carried out or referenced in preparing the brief for the adverts?

Please see answer to Question 1.

12. What were the exact details of the brief that was provided to the advertising company (The Union) for each of the two adverts.

Please see attached brief which has been redacted as an exemption under section 38(1)(b) of FOISA (personal information) applies to some of the information requested because it is personal data of a third party, ie names of individuals, and disclosing it would contravene the data protection principles in Schedule 1 to the Data Protection Act 1998. This exemption is not subject to the 'public interest test', so we are not required to consider if the public interest in disclosing the information outweighs the public interest in applying the exemption.

13. What are the details of any nutritional or medical professionals and charities (including DUK and JDRF) who viewed the adverts prior to broadcast? How were these chosen? If none, why were they not given the opportunity to do so?

Food Standards Scotland's Diet and Nutrition professionals and Board members with nutritional and/or medical backgrounds; NHS Health Scotland and Obesity Action Scotland. Diabetes UK and JDRF were not included in this stakeholder list as the campaign is about the cumulative risks and potential health consequences of continued unhealthy snacking and 'treating' leading to overweight and obesity. The links to Type 2 diabetes and the other health consequences referred to in the two broadcast adverts are well-evidenced and established.

14. Which FSS staff, senior management and board members viewed each of the adverts prior to broadcast? In particular, did Ross Finnie view these adverts prior to broadcast?

Food Standards Scotland's Chair, some Board members, some members of the Senior Management Team and a number of FSS staff viewed the adverts prior to broadcast.

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15. How much did the Healthy Eating campaign cost in total?

The campaign is still running on some channels (not TV) at time of writing, so some costs are still to be received. In line with other public sector bodies, FSS publishes all 'public relations' spend quarterly. This covers campaign costs.

16. What were the advertising budgets and final costs for each of the 2 broadcast adverts?

The two advertisements were developed and media was bought in tandem, so it is not possible to separate budgets and costs for these out.

Final costs for TV Planning, Creative Development and Production associated with the two advertisements - £119,729.00

Final costs for TV Media Planning and Buying (ITV/CH4/Sky) - £118,607.41

17. What are the details of all the times and TV channels each advert was broadcast on for the duration of the campaign?

Please see attached spreadsheet showing spot times for the two TV advertisements.

18. How many complaints and/or negative comments were received by FSS (via phone, email, social media platforms) once the campaign launched and the adverts were aired?

Food Standards Scotland received 35 complaints by email or phone. An exemption under section 25(1) of FOISA (information otherwise accessible) applies to some of the information requested because it is available online on our social media platforms i.e. Facebook and Twitter.

19. Once complaints were received from the public, which member(s) of staff at FSS were mainly responsible for (a) decision-making on the continuation of the campaign and in making the text amendment to the 'Girl, Chocolate, Diabetes' advert and (b) responding to complaints?

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20. What was the decision-making process behind FSS's resolution to continue broadcasting the 'Girl, Chocolate, Diabetes' advert once complaints had been received from the public to FSS and the Advertising Standards Authority, as well as representatives from the national Diabetes charities Diabetes UK and Junior Diabetes Research Foundation?

Communication between relevant communications and marketing staff, Chief Executive and Chair and unanimous decision to continue given the importance of the issue and scale of the problem of obesity in Scotland. For clarity, no formal complaint was received from Diabetes UK and none of the complaints received by the Advertising Standards Authority were upheld.

21. What education on nutrition, diet and health are employees and representatives of FSS given in preparation for delivering information to the public on roadshows and demonstrations/events as part of the Healthy Eating campaign?

Some FSS employees are already nutritionists and have degrees and qualifications in the subject. FSS representatives are fully briefed with information and advice from these

professionals and are further briefed that any detailed or difficult questions relating to nutrition should be passed back to FSS, or to health to the NHS.

22. How are/will FSS be involved in schools and the Healthy and Wellbeing part of the curriculum, and will these materials give any reference to "diabetes"?

FSS works closely with Scottish Government, Education Scotland and NHS Health Scotland, alongside other food education partners. We have our own teachers' resource pack, a classroom digital resource (Cookin Castle), the Eatwell Guide (a new interactive version for schools is being launched later this year) all linked to the Curriculum for Excellence and all researched with teachers. Review of all items is currently underway and development of FSS messaging in schools on diet and nutrition for children and their families is a focus for 17/18. Some of these resources make reference to diabetes.