



Government of **Western Australia**  
Department of **Health**

# Healthy Options WA: Food and Nutrition Policy for WA Health Services and Facilities

Operational Directive: OD 0627/15

## 2018–19 Statewide Audit of Policy Implementation

**Final report, revised January 2020**

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## Executive summary

This report details results of the 2018–19 statewide audit of compliance with the *Healthy Options WA: Food and Nutrition Policy for WA Health Services and Facilities*<sup>1</sup> ('the Policy'). This report supersedes the 2018-19 statewide audit of Policy implementation report released in June 2019.

The Policy aims to improve the health of WA Health staff and the broader community by creating healthcare environments that support and model nutritious and healthy eating options.

The Policy applies a 'traffic light' system (**Green**, **Amber**, and **Red**) to classify food and drinks from healthiest through to least healthy, respectively. The Policy stipulates foods and drinks that can be offered, displayed and promoted in food and drink outlets; vending machines; professional and business catering; and fundraising initiatives, events and prizes; in all WA Health facilities. Under the Policy, at least 50% of all food and drink on *offer* and on *display* must be classified as **Green**, no more than 20% may be classified as **Red**, with the remainder classified as **Amber**. Only **Green** food and drinks may be promoted and the use of **Red** food and drinks for fundraising initiatives, events and prizes is not permitted.

Responsibility for day-to-day management, compliance and implementation of the Policy rests with health service Executive Directors, Directors and senior managers across WA Health. The Department of Health Chronic Disease Prevention Directorate (CDPD) is steward of this mandatory, system-wide policy and provides policy implementation support to Health Service Providers (HSPs) through a suite of resources<sup>2</sup>.

The last survey of implementation of the Policy (2016) found a low level of compliance across all food and drink outlet types<sup>3</sup>. On 3 May 2018, the Minister for Health, the Hon Roger Cook MLA, wrote to Health Service Board Chairs requesting that all WA Health services and facilities become fully compliant with the Policy by 31 October 2018, after which WA Health services and facilities would be evaluated against the Policy requirements. The CDPD coordinated a statewide audit of

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<sup>1</sup> Department of Health (2018) Healthy Options WA: Food and Nutrition Policy for WA Health Services and Facilities (Operational Directive: OD 0627/15 [Available from: <https://ww2.health.wa.gov.au/About-us/Policy-frameworks/Public-Health/Mandatory-requirements/Public-Health-Chronic-Disease-Prevention-and-Health-Promotion/Healthy-Options-WA-Food-and-Nutrition-Policy-for-WA-Health-Services-and-Facilities> ]

<sup>2</sup> Healthy Options WA Policy website: [https://ww2.health.wa.gov.au/Articles/A\\_E/About-the-Healthy-Options-WA-Policy](https://ww2.health.wa.gov.au/Articles/A_E/About-the-Healthy-Options-WA-Policy)

<sup>3</sup> Unpublished data

compliance from November 2018 through to January 2019. The Western Australian Canteen Association (WASCA) was contracted to visit sites and collect audit data.

While there remains room for improvement in achieving full compliance with the Policy (across individual sites) some significant improvements toward compliance have been made. Since the audits, WASCA has provided site-specific feedback and offered support to each HSP to continue improvements in policy compliance. It is important to note, therefore, that this report captures a snapshot in time. Since the audit, HSPs have been providing targeted support to outlet managers and vending machine suppliers to implement WASCA's recommendations. Some specific actions taken by HSPs include:

- investigating a strengthening of the Policy within their own catchment to include further restrictions on **Red** food and drinks
- voluntary removal of **Red** sugary drinks (or investigating feasibility)
- working with food outlet managers to improve the nutrient profile of recipes
- educating vending machine suppliers and auxiliary groups on how to replace **Red** food and drink with **Green** and **Amber** products
- conducting additional in-house audits
- identifying a Policy champion to advance policy implementation

The Department will continue to support HSPs by further refining its policy implementation tools and resources, with a focus on the least compliant operators, fundraising and prizes/events, and increasing Policy awareness. Some additional actions currently under consideration by CDPD (to occur in partnership with HSPs) include: development of Policy promotion and marketing resources; development of interactive online policy education resources; dissemination of successful examples of policy implementation; and adaptation of audit tools to support continuous self-auditing.

The findings from the 2018–19 statewide audit have informed an in-depth review and strengthening of the Policy, to take effect in the second half of 2020.

## Key findings

### Audit sample

- A total of 25 WA health facilities (sites) were audited (12 metropolitan, 13 regional) across all HSPs.
- A total of 158 vending machines, 52 café/kiosk/canteen outlets and 7 ward trolleys were audited against the Policy requirements.
- Over 7,000 food and drink items were classified according to the Policy's 'traffic light' system (**Green**, **Amber**, and **Red**).

### Overview of compliance

- Overall, 51% of the 217 audited food providers (i.e. cafés/kiosks/canteens, vending machines and ward trolleys) were compliant with the Policy i.e. met all of the Policy requirements.
- No WA Health site was fully compliant with the Policy (**Table A**). Full compliance was defined as all food providers within a site meeting all Policy requirements.
- Fifteen of the 25 sites achieved partial compliance; in these sites the proportion of food providers that met all policy requirements ranged from 12% to 86% (**Table A**).
- Ten of the 25 audited sites (40%) were found to have zero compliance, that is, no food provider met all requirements of the Policy (**Table A**).

### Cafés/kiosk/canteens

- Overall, 28.8% of café/kiosk/canteen outlets met all Policy requirements.
- WA Health-owned outlets were most likely to meet all Policy requirements (63.6%) and auxiliary operated outlets were least compliant (11.1%).
- The majority (82.7%) of outlets met the promotion requirements of the Policy.

### Vending machines

- Overall, 59.5% of vending machines met all Policy requirements.
- 'Drinks only' vending machines were most likely to meet all Policy requirements (83.7%) and 'food only' vending machines were least compliant (6.3%).
- The majority of vending machines (96.2%) met promotion requirements of the Policy. Of these 53.2% promoted **Green** items.

### Qualitative findings

- The most commonly perceived enablers of policy implementation were: support from dietitian/health promotion staff; the Healthy Options Implementation Guide; and support from hospital management.

- The most commonly perceived barriers to policy implementation were: concerns regarding potential profit loss; difficulty in finding products to align with the Policy; and confusion about the Policy.
- Awareness of existing resources to support policy implementation among food outlet managers and staff was low.
- Compliance with the Policy requirements in business and professional catering and fundraising requires future focus.



**Table A. Summary of full policy compliance by site and outlet, 2018–19**

Health Service Provider	Audited Site	Cafés/kiosks/ canteens		Vending machines		Full Compliance <sup>a</sup>		
		Total	Compliant	Total	Compliant	Total	Compliant	% Compliant 2018/19
EMHS	Royal Perth Hospital	8	6	27	24	35	30	86%
EMHS	Bentley Hospital	3	1	7	7	10	8	80%
SMHS	Fremantle Hospital	1	0	17	14	18	14	78%
NMHS	Graylands Hospital	1	0	3	3	4	3	75%
NMHS	Osborne Park Hospital	1	0	2	2	3	2	67%
NMHS	King Edward Memorial Hospital	3	1	8	6	11	7	64%
NMHS	Sir Charles Gairdner Hospital	5	1	37	24	42	25	60%
EMHS	Armadale Hospital	2	1	8	5	10	6	60%
CAHS	Perth Children's Hospital	6	4	4	1	10	5	50%
SMHS	Rockingham General Hospital	2	0	4	2	6	2	33%
WACHS	Narrogin Hospital	1	0	2	1	3	1	33%
WACHS	Busselton Hospital	2	1	1	0	3	1	33%
WACHS	Kalgoorlie Hospital	0	0	5	1	5	1	20%
WACHS	Bunbury Hospital	2	0	4	1	6	1	17%
SMHS	Fiona Stanley Hospital	9	0	17	3	26	3	12%
DH <sup>b</sup>	Royal St Café	1	0	0	0	1	0	0%
WACHS	Harvey Health Service Hospital	0	0	1	0	1	0	0%
WACHS	Karratha Health Campus	0	0	2	0	2	0	0%
WACHS	Katanning Hospital	0	0	1	0	1	0	0%
WACHS	Hedland Health Campus	1	0	2	0	3	0	0%
WACHS	Geraldton Hospital	1	0	2	0	3	0	0%
WACHS	Esperance Hospital	0	0	1	0	1	0	0%
WACHS	Albany Hospital	2	0	2	0	4	0	0%
WACHS	Plantagenet/Cranbrook Health Service	0	0	1	0	1	0	0%
WACHS	Northam Hospital	1	0	0	0	1	0	0%
	<b>Total</b>	<b>52</b>	<b>15</b>	<b>158</b>	<b>94</b>	<b>210</b>	<b>109</b>	
	<b>%</b>		<b>28.8%</b>		<b>59.5%</b>		<b>51.9%</b>	

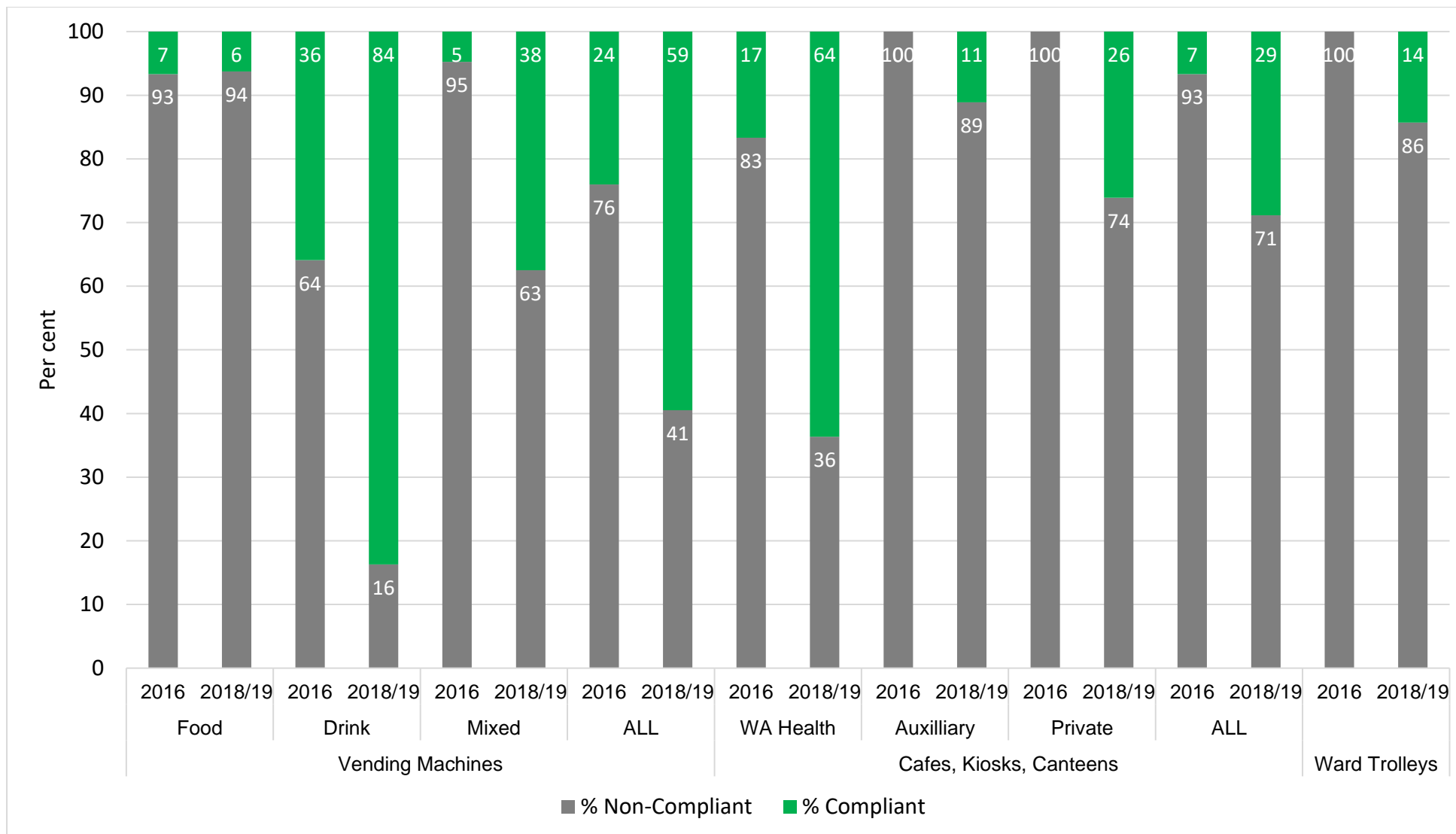
<sup>a</sup> Ward trolleys excluded (n=7) as they were not systematically audited across sites.

<sup>b</sup> Department of Health

### Progress toward compliance: comparisons between 2016 and 2018–19 audits

- Cafés/kiosks/canteens, vending machines, and ward trolleys all demonstrated increased Policy compliance since 2016 (**Figure A**).
- The greatest increases in full compliance with the Policy were seen in ‘drinks’ vending machines (48% increase) followed by WA Health operated cafés/kiosks/canteens (47% increase in the number of compliant outlets). ‘Food’ vending machines and auxiliary operated outlets were least compliant in both audits (Figure A).
- Increases in compliance varied across HSPs (see Tables 12, 14).
- In cafés/kiosks/canteens, increases in the average proportion of **Green** items on offer and display since 2016 ranged from 11-21%. Decreases in average proportion of **Red** items on offer and display ranged from 7-17% (Tables 16, 17).
- In vending machines, increases in the average proportion of **Green** items on offer since 2016 ranged from 14% to 28%. Decreases in average proportion of **Red** items on offer ranged from 12% to 35% (Table 19).

**Figure A. Proportion of outlets compliant with all Policy requirements, 2016 and 2018–19**



## Background

The Department of Health's mandatory system-wide *Healthy Options WA: Food and Nutrition Policy for WA Health Services and Facilities (Operational Directive: OD 0627/15)*, 'the Policy', was introduced in Western Australia in 2008 and revised in 2009 and 2015. The Policy aims to improve the health of WA Health staff and the broader community by providing healthcare environments that support and model nutritious and healthy eating options, while limiting the provision and promotion of energy-dense nutrition-poor food and drink options.

Just over two-thirds of adults<sup>4</sup> and more than one-quarter of children<sup>5</sup> aged 5–15 years in Western Australia were estimated to be overweight or obese in 2017. The Policy is integral in ensuring staff, visitors and outpatients to WA Health services and facilities are offered healthy food and drink options that promote and encourage healthy eating patterns and contribute to curbing the rises in obesity, as are priorities in the *Western Australian Health Promotion Strategic Framework 2017-2021*<sup>2</sup> and the *Final Report of the WA Sustainable Health Review*<sup>3</sup>. The Policy aims to ensure that environments in health care facilities are consistent with current health promotion messages from health professionals and Department of Health policies, programs and investments, and that WA Health demonstrates leadership in creating healthy environments.

Responsibility for implementation and compliance with the Policy rests with WA Health services and facilities and applies to all staff. The day-to-day management, compliance, and implementation of the Policy is delegated to Executive Directors, Directors and senior management in each health service. The Policy is applicable to all health service executive and senior management, food catering managers and staff, food contract/lease managers, volunteer/auxiliary staff operating kiosks, and health service staff.

The Chronic Disease Prevention Directorate (CDPD) in the Department of Health (the Department) is steward of this mandatory, system-wide Policy. The CDPD provides support to Health Service Providers (HSPs) involved in implementing the Policy through a suite of resources, including a detailed food and drink Policy Implementation Guide, a commonly supplied food and drink guide, telephone and email support, e-newsletters, training seminars, and online networks, all available via the dedicated *Healthy Options WA Policy* website<sup>4</sup>.

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<sup>4</sup> Merema M, Radomiljac A. Health and Wellbeing of Adults in Western Australia 2017, Overview and Trends. Department of Health, Western Australia; 2018.

<sup>5</sup> Merema M, Radomiljac A. Health and Wellbeing of Children in Western Australia in 2017, Overview and Trends. Department of Health, Western Australia; 2018.

## Policy requirements

The Policy applies to all settings and occasions where food and drinks are available to staff, visitors, and outpatients within WA Health and covers:

- all retail food and drink outlets under the control or management of WA Health, including food and drink vending machines; cafés and coffee shops; staff cafeterias and canteens; ward trolleys; and other outlets and kiosks;
- professional and business event catering; and
- fundraising initiatives, events and prizes.

The Policy uses the ‘traffic light’ system of food and drinks classification based on nutrient content and alignment with the Australian Dietary Guidelines and Australian Guide to Healthy Eating. According to the Policy, all food and drinks sold in WA Health Facilities and Services are to be classified as **Green**, **Amber** and **Red**:

**Green food and drinks** - These are the healthiest choices, because they are excellent sources of important nutrients and represent one or more of the five food groups needed for optimum health and wellbeing. They are low in saturated fat, added sugar and salt;

**Amber food and drinks** - These have some nutritional value, but contain moderate levels of saturated fat, added sugar and/or salt and can contribute to excess energy intake. These need to be chosen carefully and eaten in moderation;

**Red food and drinks** - These are energy-dense, but have little nutritional value. Most are high in saturated fat, salt and/or sugar. These foods and drinks can contribute to excess energy intake if consumed in large amounts or on a frequent basis. These should be considered to be ‘discretionary’ food and drinks and only be consumed occasionally or in small amounts.

Further information regarding traffic light categories can be found on the *Healthy Options WA Policy* website<sup>4</sup>.

The requirements of the Policy relate to offer, display and promotion of food and drinks:

- **Food and drinks offered** - the range and number of different items of food and drink options *available* for purchase. A minimum of 50% of items offered must be **Green** food and drinks and no more than 20% of items offered should be **Red** food and drinks.
- **Food and drinks displayed** – this is the area or space within the outlet that is available to place food and drinks *on view* to customers. At least 50% of items displayed must be occupied by **Green** food and drinks, and no more than 20% of the display area may be occupied by **Red** food and drinks.
- **Food and drinks promoted** - Only **Green** food and drink items may be promoted.

In addition:

- The use of **Red** food and drink items in fundraising activities is not permitted.
- Sponsorship of food and drinks or 'free' meals from companies and businesses can only be supported in WA Health facilities if consistent with the Offer/Display requirements above.

## Previous compliance with the policy

The Department has conducted two previous audits of compliance against the Policy. The first was conducted as a 'self-audit' in December 2010. A total of 29 metropolitan and regional sites participated and provided data from 103 WA Health onsite food and drink outlets. The Department requested HSPs to nominate a representative at each site to complete an '*audit guideline for monitoring and ensuring compliance tool*'; which captured qualitative and quantitative data relevant to the Policy requirements. Evaluation of the data was contracted to an independent assessor, the WA School Canteen Association (WASCA). Each of the audited sites received a summarised individualised site/outlet report detailing how each outlet performed against the Policy, as well as providing practical recommendations to achieve compliance. Overall, the 2010 results demonstrated that the majority of sites had adopted the Policy and were working towards Policy compliance.

The second audit against Policy compliance took place in January 2016. This was based on the 2010 audit however, data were collected by an independent auditor (WASCA) and significant improvements were made to the auditing instruments. As a result, the 2010 and 2016 audit data were not directly comparable. The 2016 audit included 24 WA Health sites and 162 outlets comprising 30 cafés/kiosks/canteens,

129 vending machines, and three ward trolleys. Each of the audited sites received an individualised report detailing each how each outlet performed against the Policy, as well as providing practical recommendations to achieve compliance. Despite efforts by many WA Health sites to increase compliance against offer, display, and promotion requirements following the 2010 self-audit, compliance with the Policy was found to be low across all outlet types.

As a result of the 2016 audit findings, several policy implementation resources and tools were developed or updated, including the Healthy Options WA Policy Implementation guide; Frequently Asked Questions; a business catering guide; a commonly supplied food and drink guide; as well as updates to the *Healthy Options WA Policy* website.

### **The 2018–19 audit**

The WA Preventive Health Summit held in March 2018 highlighted several domains for policy action to address rising rates of obesity, including policies to reduce unhealthy food and drink being sold in WA hospitals and other state-owned institutions<sup>6</sup>. Following this, in May 2018 the Minister for Health, the Hon Roger Cook MLA, wrote to Health Service Board Chairs requesting that all WA Health services and facilities become fully compliant with the *Healthy Options WA: Food and Nutrition Policy for WA Health Services and Facilities* by 31 October 2018, after which time WA Health services and facilities would be audited against the Policy requirements.

The CDPD coordinated an independent statewide audit of policy compliance in WA Health facilities and services in November 2018 through to January 2019. The main objectives were to evaluate policy implementation, gather information relevant to a forthcoming review of the Policy, and guide development of policy support resources.

This report details the findings of the 2018–19 audit, including:

- levels of full policy compliance;
- progress toward meeting policy compliance;
- comparisons between the 2016 and 2018–19 audits; and
- reported barriers and enablers of policy implementation.

The findings from the 2018–19 statewide audit have informed an in-depth review and strengthening of the Policy, to take effect in the second half of 2020.

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<sup>6</sup> Chronic Disease Prevention Directorate. WA Preventive Health Summit Summary Report. Western Australian Department of Health; Perth 2018. Available from: [<https://www.healthywa.wa.gov.au/~media/Files/HealthyWA/New/WA%20Preventive%20Health%20Summit/Summary-report-key-themes.pdf>]

This report supersedes the 2018-19 Statewide Audit of Policy Implementation Report that was published in June 2019.

## Methods

The Western Australian School Canteen Association (WASCA) was contracted by the CDPD to conduct the 2018–19 statewide audit of compliance against the *Healthy Options WA: Food and Nutrition Policy for WA Health Services and Facilities*. The WASCA was selected to conduct the audits based on its extensive expertise and track record in delivering nutrition support services in the service setting (including supporting HSPs since 2003), familiarity with the Policy (having conducted the independent audit in 2016), reliability and independent standing (based on its successful delivery of high quality contracted services previously for CDPD), and earlier experience in developing the audit tools. The WASCA was contracted to:

- refine the audit tools with the CDPD
- contact sites to arrange a pre-visit interview
- collect and manage audit data
- provide training to WACHS representatives to conduct self-audits
- analyse individual site data and provide post-audit feedback and policy implementation support to sites
- recommend sustainable policy implementation strategies
- provide CDPD with a clean dataset for a detailed analysis of all sites.

## 2018–19 audit sites

The CDPD determined the following criteria for selecting WA Health services and facilities (sites) to be audited against the Policy:

- Inclusion of at least three of the largest public hospitals from each of the metropolitan HSPs (East Metropolitan Health Service, North Metropolitan Health Service, South Metropolitan Health Service and Child and Adolescent Health Service).
- Preference to include at least two of the largest public hospitals in each WA Country Health Service (WACHS) region, with a minimum of one site from every WACHS region where a food outlet or vending machine exists (see Table 1 for list of WACHS regions).



- Preference to include WA Health sites captured in the 2016 audit to allow comparisons.
- Preference to include public hospitals instead of hospitals run as a combination of public and private (i.e. those sites with clear lines of responsibility for policy implementation).

Before confirming the list of sites for audit, the CDPD checked with HSPs to confirm that each selected site had at least one onsite café/kiosk/canteen or vending machine. Three regional sites included in the 2016 audit (Leonora Hospital, Broome Health Service, Derby Health Service) were not audited in 2018–19 as they no longer had food retail providers on site (information provided by regional WACHS representatives). Therefore, three additional sites were identified for audit, including two WACHS sites: Plantagenet/Cranbrook Health Service and Harvey Health Service Hospital. As no other WACHS sites with onsite food outlets or vending machines could be identified, Graylands Hospital (North Metropolitan Health Service) was selected for audit (included in the 2016 audit). The final list of audited sites is in **Table 1**. Of the 25 sites selected for the 2018–19 audit, 20 were included in the 2016 audit.

Owing to the short audit timeframe the WASCA was not able to travel to and audit all WACHS regional sites. Therefore, some self-audits conducted by WACHS staff were necessary (**Table 1**). These were mainly in smaller WA Health facilities that had vending machines only and the data collected in these audits were supported by photographic evidence, which was checked by WASCA before analysis.

In October 2018, the Department of Health’s Director-General Dr David Russell-Weisz wrote to Health Service Board Chairs and Chief Executives to advise them of the timing of the Policy audits. Health promotion managers in each HSP were notified by the CDPD of the forthcoming audits and requested to provide a point of contact from each site, to facilitate data collection.

Before the onsite audits, WASCA conducted interviews with HSP staff in each site to identify changes implemented to increase Policy compliance since the 2016 audit. This information was used to tailor the feedback WASCA provided to each site after the audits.

**Table 1. WA Health facilities and services included in the 2018–19 audit**

<b>METROPOLITAN HEALTH SERVICE</b>	<b>East Metropolitan Health Service</b>	<b>North Metropolitan Health Service</b>	<b>South Metropolitan Health Service</b>	<b>Child And Adolescent Health Service</b>	<b>Department of Health</b>		
	Bentley Hospital	King Edward Memorial Hospital	Rockingham General Hospital	<i>Perth Children's Hospital<sup>a, b</sup></i>	Royal Street Café		
	Royal Perth Hospital	Osborne Park Hospital	<i>Fiona Stanley Hospital<sup>a</sup></i>				
	Armadale Hospital	Sir Charles Gardner Hospital	Fremantle Hospital				
		Graylands Hospital					
<b>WA COUNTRY HEALTH SERVICE<sup>c</sup></b>	<b>Goldfields</b>	<b>Great Southern</b>	<b>Midwest</b>	<b>Kimberley</b>	<b>Pilbara</b>	<b>South West</b>	<b>Wheatbelt</b>
<b>WASCA audited sites</b>		Albany Hospital	Geraldton Hospital			Bunbury Hospital Busselton Health Campus	<i>Narrogin Hospital<sup>a</sup></i>  Northam Hospital
<b>Self (WACHS) audited sites</b>	Kalgoorlie Hospital  Esperance Hospital	Katanning Hospital  <i>Plantagenet Cranbrook Health Services Hospital<sup>a</sup></i>			Hedland Health Campus  Karratha Health Campus	<i>Harvey Health Service Hospital<sup>a</sup></i>	

<sup>a</sup> Sites not included in the 2016 audit (italicised).

<sup>b</sup> There is one major hospital in Child and Adolescent Health Services; Perth Children's Hospital replaced Princess Margaret Hospital for Children in 2018.

<sup>c</sup> No sites with onsite food and drink outlets or vending machines could be identified in the Kimberley WA Country Health Service region.

## Audit instruments

The WASCA worked in consultation with the Department to update the 2018–19 audit data collection instruments, which were adapted from those used in the 2016 audit. Audits conducted by WASCA used online tools adapted to ‘Survey Monkey’ and those audits conducted by WACHS used a paper-version of the tool (**Appendix 1 and 2**). The 2018–19 audit questions were tailored according to current Policy needs and an upcoming review of the Policy. Comparability with the 2016 audit instruments was preserved where possible, to allow data comparisons. The auditing instruments were modified to support self-audits in some regional sites.

The methodology for the calculation of ‘offer’ and ‘display’ in all food and drinks outlets (cafés/kiosks/canteens, vending machines and ward trolleys) in the 2018-19 audit was consistent with that used in the 2016 audit. In September 2018, HSPs were sent communication confirming the methodology that would be applied in the 2018-19 audit.

The 2018–19 audit instrument comprised three sections (**Appendix 1 and 2**).

1. A questionnaire to capture qualitative data on Policy implementation. This collected information from food outlet managers and their staff and WA Health staff responsible for supporting the implementation the Policy on policy knowledge, skills, confidence, and enablers and barriers to implementing the Policy. The instrument also captured information (where applicable) on business catering and fundraising activities in relation to the Policy, successes and use of Policy support tools and resources, as well as areas requiring additional support.
2. Assessment of the food environment in cafés/kiosks/canteens and items sold in vending machines and on ward trolleys according to the traffic light system and other requirements of the Policy (i.e. food and drinks on offer, display and promoted).
3. Capturing information on all items offered, displayed, and promoted using photographic evidence.

The WASCA piloted-tested the audit instruments and amended the instruments to resolve any ambiguities. To increase the reliability of the instruments, a set of protocols was adopted to ensure consistency where assumptions were necessary about food and drink classifications.

Prior to the statewide audit, the Department and WASCA delivered a videoconference training session for WACHS representatives (health promotion officers, dietitians, and nutritionists) assisting with self-audits.

## Data analysis

The WASCA provided the Department with cleaned data for each site's food outlets, vending machines and ward trolleys, detailing offer, display, and promotion compliance. Compliance was defined as meeting all of the Policy requirements in relation to offer, display and promotion. For a site (WA Health facility) to meet full Policy compliance, all food outlets, vending machines and ward trolleys in that site were required to meet all of the Policy requirements.

The CDPD undertook detailed analyses of the data. Mean proportions of **Green**, **Amber**, and **Red** food and drink items were calculated to indicate progress toward meeting Policy compliance. Compliance and progress toward compliance were compared in the 2016 and 2018–19 audit. Analyses were stratified by HSP and operation type (WA Health, auxiliary/volunteer and private) where relevant. Results are presented separately for food outlets (cafés/kiosks/canteens), vending machines and ward trolleys. All analyses were conducted using Microsoft Excel software.

## Audit feedback

All site managers, executives, and HSP health promotion staff were provided with a written report from WASCA following each site audit. The report outlined compliance against the minimum requirements of the Policy by audited food outlet, vending machine and ward trolley (where relevant). Each report was accompanied by a menu assessment spreadsheet containing a colour-coded and itemised **Green**, **Amber**, and **Red** list of all food and drinks available on the day of the audit as well as items listed on menus. The reports detailed recommendations to improve Policy compliance, such as replacing **Amber** or **Red** items with **Green** and alternative recipes or new products. WASCA was contracted by the Department until 31 May 2019 to support HSPs and WA Health services and facilities to implement the recommendations made.

A copy of WASCA's most recent StarChoice<sup>tm</sup> Buyers Guide was also posted to each site. This guide contains a list of products classified as **Green** or **Amber** and was referenced in each site report. The Policy website also provides a suite of additional tools, resources, including a link to the Implementation guide and general information to support implementation of the Policy.

An example site report is provided in **Appendix 3**.

## Policy compliance

The following results describe compliance with the Policy during the audit period, November 2018–January 2019.

- A total of 25 WA Health services and facilities (sites) were assessed against the Policy, including sites in the East Metropolitan Health Service (EMHS), North Metropolitan Health Service (NMHS), South Metropolitan Health Service (SMHS), Child and Adolescent Health Service (CAHS), WA Country Health Service (WACHS) and the Department of Health (DH) (**Table 2**).
- Of these, 12 were metropolitan and 13 were regional sites with at least one or a combination of canteens, cafés, kiosks, vending machines and ward trolleys.
- A total of 217 audits were conducted in 52 cafés/kiosks/canteens, 158 vending machines, and 7 ward trolleys.
- Over 7,000 food and drink items were classified according to the Policy’s traffic light system.

**Table 2. Types of food and drink providers audited**

Outlet type	EMHS	NMHS	SMHS	CAHS	DH	WACHS	TOTAL
Cafés/canteens/kiosks	13	10	12	6	1	10	52
Vending machines	42	50	38	4	0	24	158
Ward trolleys	1	2	1	0	0	3	7
<b>TOTAL</b>	<b>56</b>	<b>62</b>	<b>51</b>	<b>10</b>	<b>1</b>	<b>37</b>	<b>217</b>
Number of sites surveyed	3	4	3	1	1	13	25

### Summary of policy compliance by Health Service Provider (Table 3)

- Compliance with the Policy varied considerably by site, ranging from zero (10 of the 25 audited sites) up to 86% of all outlets and vending machines within a site meeting all Policy requirements.
- Ward trolleys were not included in the summary of overall policy compliance as these were not systematically audited (as were cafés/kiosks/canteens and vending machines) and the sample size was small.
- It should be noted that the number of cafés/kiosks/canteens and vending machines in each site varies and this may have influenced the achievement of full compliance.

**Table 3. Summary of full policy compliance by site and outlet type, 2018–19**

Health Service Provider	Audited Site	Cafés/kiosks/canteens		Vending machines		Full Compliance <sup>a</sup>		
		Total	Compliant	Total	Compliant	Total	Compliant	% Compliant 2018/19
EMHS	Royal Perth Hospital	8	6	27	24	35	30	86%
EMHS	Bentley Hospital	3	1	7	7	10	8	80%
SMHS	Fremantle Hospital	1	0	17	14	18	14	78%
NMHS	Graylands Hospital	1	0	3	3	4	3	75%
NMHS	Osborne Park Hospital	1	0	2	2	3	2	67%
NMHS	King Edward Memorial Hospital	3	1	8	6	11	7	64%
NMHS	Sir Charles Gairdner Hospital	5	1	37	24	42	25	60%
EMHS	Armadale Hospital	2	1	8	5	10	6	60%
CAHS	Perth Children's Hospital	6	4	4	1	10	5	50%
SMHS	Rockingham General Hospital	2	0	4	2	6	2	33%
WACHS	Narrogin Hospital	1	0	2	1	3	1	33%
WACHS	Busselton Hospital	2	1	1	0	3	1	33%
WACHS	Kalgoorlie Hospital	0	0	5	1	5	1	20%
WACHS	Bunbury Hospital	2	0	4	1	6	1	17%
SMHS	Fiona Stanley Hospital	9	0	17	3	26	3	12%
DH <sup>b</sup>	Royal St Café	1	0	0	0	1	0	0%
WACHS	Harvey Hospital	0	0	1	0	1	0	0%
WACHS	Karratha Health Campus	0	0	2	0	2	0	0%
WACHS	Katanning Hospital	0	0	1	0	1	0	0%
WACHS	Hedland Health Campus	1	0	2	0	3	0	0%
WACHS	Geraldton Hospital	1	0	2	0	3	0	0%
WACHS	Esperance Hospital	0	0	1	0	1	0	0%
WACHS	Albany Hospital	2	0	2	0	4	0	0%
WACHS	Plantagenet/Cranbrook Health Service	0	0	1	0	1	0	0%
WACHS	Northam Hospital	1	0	0	0	1	0	0%
	<b>Total</b>	<b>52</b>	<b>15</b>	<b>158</b>	<b>94</b>	<b>210</b>	<b>109</b>	
	<b>%</b>		<b>28.8%</b>		<b>59.5%</b>		<b>51.9%</b>	

<sup>a</sup> Ward trolleys excluded (n=7) as they were not systematically audited across sites.

<sup>b</sup> Department of Health

## Compliance in cafés, kiosks and canteens

### Summary of cafés/kiosks/canteens

- 19 of the 25 audited sites had at least one café, canteen or kiosk; of these 12 were metropolitan and seven were regional sites.
- Overall, 28.8% (n=15) of audited cafés/canteens/kiosks met all Policy requirements.

### Café/kiosk/canteen compliance by operation (Table 4)

- Outlets operated by WA Health were most likely to meet all of Policy requirements (63.6%).
- Auxiliary volunteer operated outlets were the least likely to meet all of the Policy requirements (11.1%).
- 82.7% of outlets met the promotion requirements of the Policy. Of these, 67.3% promoted **Green** only and 15.4% had no promotion.

**Table 4. Café/kiosk/canteen compliance by operation**

Operated by	No. outlets audited	No. outlets compliant with offer requirements	No. outlets compliant with display requirements	No. of outlets promoting Green only	No. Outlets compliant with promotion requirements	No. and proportion of outlets meeting all policy requirements
WA Health	11	9	8	8	10	7 (63.6%)
Auxiliary	18	2	2	10	14	2 (11.1%)
Private	23	9	7	17	19	6 (25.0%)
<b>TOTAL</b>	<b>52</b>	<b>20 (38.5%)</b>	<b>17 (32.7%)</b>	<b>35 (67.3%)</b>	<b>43 (82.7%)</b>	<b>15 (28.8%)</b>

### Café/kiosk/canteen compliance by Health Service Provider (Table 5)

- The proportion of cafés/kiosks/canteens meeting all Policy requirements varied considerably by HSP.
- CAHS and EMHS had the greatest proportion of cafés/kiosks/canteens that met all policy requirements (66.7% and 61.5%, respectively).
- Majority of cafés/kiosks/canteens met the promotion requirements of the Policy, of these, 67.3% promoted **Green** only and 15.4% had no promotion.
- **Appendix Three** presents compliance in cafés/kiosks/canteens by operation and HSP.

**Table 5. Café/kiosk/canteen compliance by Health Service Provider**

Operated by	Total no. of outlets audited	No. of outlets meeting offer requirements	No. of outlets meeting display requirements	No of outlets promoting Green only	No. of outlets meeting promotion requirements	No. and proportion of outlets meeting all Policy requirements
EMHS	13	9	8	11	13	8 (61.5%)
NMHS	10	3	3	6	7	2 (20.0%)
SMHS	12	2	0	12	12	0 (0.0%)
CAHS	6	4	5	5	5	4 (66.7%)
DH	1	0	0	0	0	0 (0.0%)
WACHS	10	2	1	1	6	1 (10.0%)
<b>TOTAL</b>	<b>52</b>	<b>20 (38.5%)</b>	<b>17 (32.7%)</b>	<b>35 (67.3%)</b>	<b>43 (82.7%)</b>	<b>15 (28.8%)</b>



## Compliance in vending machines

One hundred and fifty-eight (158) vending machines were assessed against the Policy across 25 sites (12 metropolitan and 13 regional).

### Summary of vending machines

- The majority of audited vending machines sold ‘drinks only’ (n=86), followed by ‘mixed’ (food and drinks) (n=56) and ‘food only’ (n=16) vending machines.
- Overall, metropolitan sites had greater numbers of vending machines than regional sites.
- Of the 158 vending machines audited, 59.5% met all Policy requirements.
- The majority of vending machines (96.2%) met the promotion requirements of the Policy and of these, 53.2% promoted **Green** items.

### Vending machine compliance by machine type (Table 6)

- ‘Drinks only’ vending machines were most likely to meet all Policy requirements (83.7%).
- ‘Food only’ vending machines were least compliant (6.3%), followed by ‘mixed’ vending machines (37.5%).

**Table 6. Vending machine (VM) compliance by machine type**

Vending machine type	No. of VMs audited	No. VMs meeting offer requirements	No. VMs meeting display requirements	No. VMs promotion Green only	No. VMs meeting promotion requirements	No. and proportion meeting all policy requirements
Food Only	16	1	1	0	12	<b>1 (6.3%)</b>
Drinks Only	86	72	81	69	85	<b>72 (83.7%)</b>
Hot Drinks	27	27	27	22	27	<b>27 (100%)</b>
Cold Drinks	59	45	54	47	58	<b>45 (76.3%)</b>
Mixed (food and drinks)	56	22	27	15	55	<b>21 (37.5%)</b>
<b>Total</b>	<b>158</b>	<b>95 (60.1%)</b>	<b>109 (69.0%)</b>	<b>84 (53.2%)</b>	<b>152 (96.2%)</b>	<b>94 (59.5%)</b>

### Food only vending machines by Health Service Provider (Table 7)

- Four sites had ‘food only’ vending machines.
- Of the 16 ‘food only’ vending machines audited, only one (6.3%) met all the Policy requirements.
- 75% of ‘food only’ vending machines met the promotion requirements of the Policy.

**Table 7. Food only vending machine (VM) compliance by health service provider**

Operated by	No. sites audited	No VMs audited	No. VMs compliant with offer requirements	No. VMs compliant with display requirements	No. VMs promoting Green only	No. VMs compliant with promotion requirements	No. and proportion meeting all compliance requirements
EMHS	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NMHS	1	9	0	0	0	5	0 (0.0%)
SMHS	1	5	0	0	0	5	0 (0.0%)
CAHS	N/A	N/A	N/A	N/A	N/A	N/A	N/A
DH	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WACHS	2	2	1	1	0	2	1 (50.0%)
<b>TOTAL</b>	<b>4</b>	<b>16</b>	<b>1 (6.3%)</b>	<b>1 (6.3%)</b>	<b>0 (0.0%)</b>	<b>12 (75%)</b>	<b>1 (6.3%)</b>

N/A, not applicable (no vending machine)

### Drinks only vending machines by Health Service Provider (Table 8)

- Eighty six (86) ‘drinks only’ vending machines were audited across 15 sites.
- Of these, 83.7% were compliant with all Policy requirements.
- All ‘hot drink’ vending machines had plain block-covered skins (covers) and were therefore rated as 100% compliant for display.
- Compliance in ‘cold drink’ vending machines ranged from 0% to 94.4%
- The majority (98.8%) of ‘drinks only’ vending machines met the promotion requirements of the Policy and of these, 80.2% promoted **Green** only.

**Table 8. Drinks only vending machine (VM) compliance by Health Service Provider**

Operated by	No. VMs audited		No. VMs compliant with offer requirements		No. VMs compliant with display requirements		No. of VMs promoting Green only		No. VMs compliant with promotion requirements		No. and proportion VMs meeting all compliance requirements	
	Cold drinks	Hot drinks	Cold drinks	Hot drinks	Cold drinks	Hot drinks	Cold drinks	Hot drinks	Cold drinks	Hot drinks	Cold drinks	Hot drinks
<b>EMHS</b>	18	4	17	4	18	4	18	3	18	4	<b>17 (94.4%)</b>	<b>4 (100%)</b>
<b>NMHS</b>	23	13	21	13	20	13	20	13	23	13	<b>21 (91.3%)</b>	<b>13 (100%)</b>
<b>SMHS</b>	11	8	7	8	8	8	6	4	11	8	<b>7 (63.6%)</b>	<b>8 (100%)</b>
<b>CAHS</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	<b>N/A</b>	<b>N/A</b>
<b>DH</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	<b>N/A</b>	<b>N/A</b>
<b>WACHS</b>	7	2	0	2	5	2	3	2	6	2	<b>0 (0.0%)</b>	<b>2 (100%)</b>
<b>SUB TOTALS</b>	59	27	45	27	51	27	47	22	58	27	<b>45 (76.3%)</b>	<b>27 (100%)</b>
<b>TOTAL</b>	<b>86</b>		<b>72 (83.7%)</b>		<b>78 (90.7%)</b>		<b>69 (80.2%)</b>		<b>85 (98.8%)</b>		<b>72 (83.7%)</b>	

N/A, not applicable (no vending machine).

### Mixed (food and drink) vending machines by Health Service Provider (Table 9)

- Fifty six (56) 'mixed' vending machines were assessed across 18 sites.
- Of these, 37.5% were compliant with all requirements of the Policy.
- Majority (98.2%) were compliant with the promotion requirements of the Policy and of these, 26.8% promoted **Green** only.

**Table 9. Mixed (food and drink) vending machine compliance by Health Service Provider**

Operated by	No. sites audited	No VMs audited	No. VMs compliant with offer requirements	No. VMs compliant with display requirements	No. VMs promoting Green only	No. VMs compliant with promotion requirements	No. and proportion meeting all compliance requirements
EMHS	3	20	15	16	6	19	15 (75.0%)
NMHS	3	5	1	2	2	5	1 (20.0%)
SMHS	3	14	4	6	6	14	4 (28.6%)
CAHS	1	4	2	1	0	4	1 (25.0%)
DH	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WACHS	8	13	0	2	1	13	0 (0.0%)
<b>TOTAL</b>	<b>18</b>	<b>56</b>	<b>22 (39.3%)</b>	<b>27(48.2%)</b>	<b>15 (26.8%)</b>	<b>55 (98.2%)</b>	<b>21 (37.5%)</b>

N/A, not applicable (no vending machine).

## Compliance in ward trolleys

Ward trolleys are operated by auxiliary (volunteer) groups in hospitals. Not all ward trolleys in each WA Health site were available for audit at the time of the scheduled site visit.

### Summary of ward trolleys (Table 10)

- Seven ward trolleys were assessed in six sites, one of which met all of the Policy requirements.
- All of the audited ward trolleys met the promotion requirements of the Policy.
- Only a small sample of ward trolleys were audited, and ward trolleys were not systematically audited in every site, unlike cafés/kiosks/canteens and vending machines. Therefore, these results may not be representative of all ward trolleys in all audited sites.

**Table 10. Ward trolley compliance by Health Service Provider**

Operated by	Total no. of outlets surveyed	No. of outlets meeting offer requirements	No. of outlets meeting display requirements	No. of outlets meeting promotion requirements	No. Trolleys meeting all policy requirements
EMHS	1	0	0	1	0
NMHS	2	0	0	2	0
SMHS	1	1	1	1	1
CAHS	N/A	N/A	N/A	N/A	N/A
WACHS	3	0	0	3	0
<b>TOTAL</b>	7	1	1	7	1

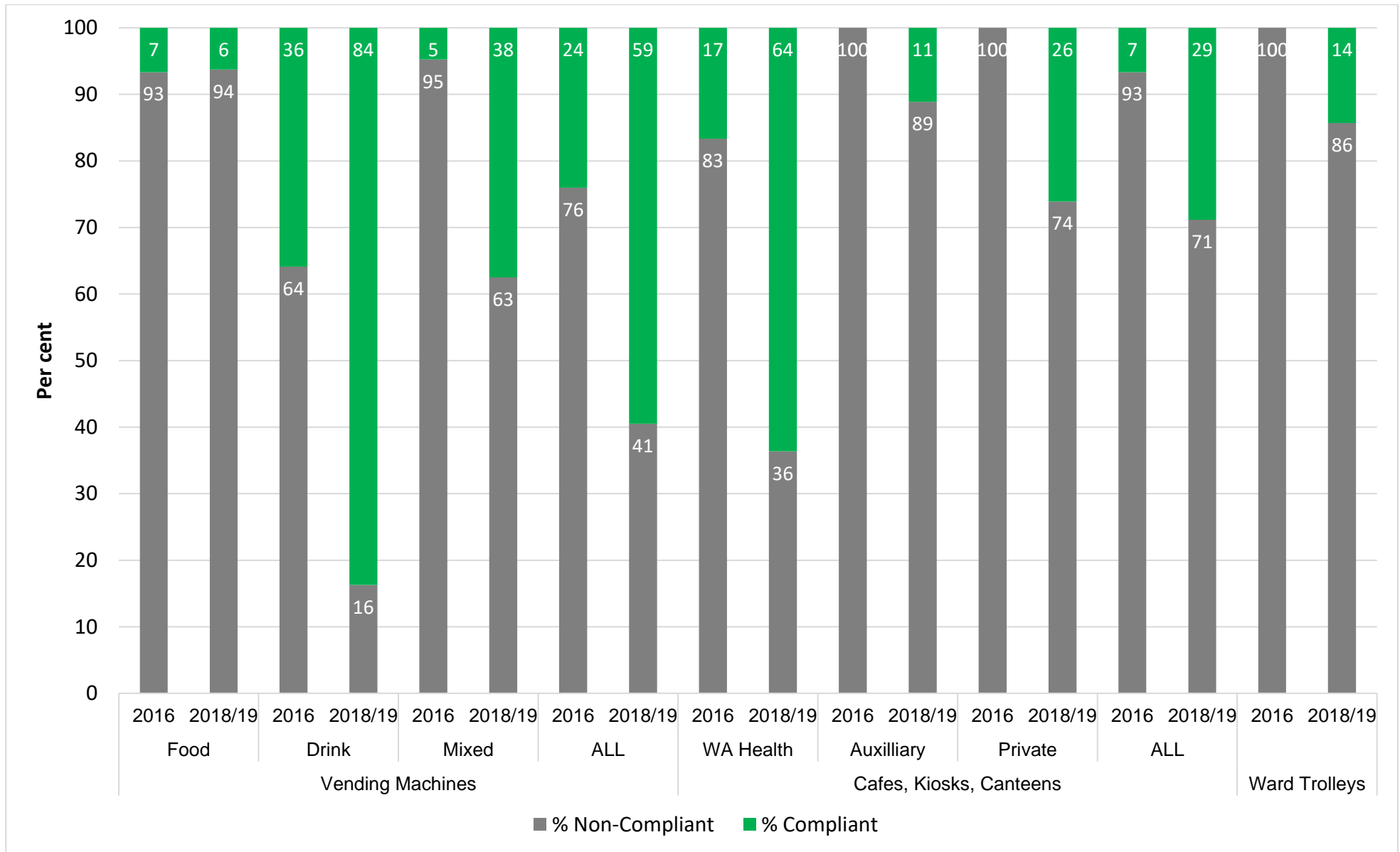
N/A, information was not provided by the HSP on ward trolleys available for audit

## Progress toward policy compliance

### Summary of changes in compliance between 2016 and 2018–19 (Figure 1)

- Cafés/kiosks/canteens, vending machines and ward trolleys demonstrated increases in Policy compliance in 2018–19.
- Increases in compliance were observed across all operation types (WA Health, auxiliary, private).
- The greatest increases in overall compliance were seen in 'drinks' vending machines (48% increase), followed by 'WA Health-operated' cafés/kiosks/canteens (47% increase).

**Figure 1. Proportion of outlets compliant with all Policy requirements, 2016 and 2018–19**



## Compliance in cafés, canteens and kiosks

### Changes in café/kiosk/canteen compliance by operation, 2016 and 2018–19

#### (Table 11)

- More cafés/kiosks/canteens were surveyed in 2018–19 (n=52) than in 2016 (n=30).
- There was a 22.2% increase in the proportion of cafés/kiosks/canteens meeting all Policy requirements between 2016 and 2018–19.
- In 2016 and 2018–19, WA Health operated outlets were most likely to meet all of the Policy requirements and these showed the greatest increase in compliance (47%) in 2018–19, followed by privately operated outlets (26.1% increase).
- In 2016 and 2018–19, auxiliary (volunteer) operated outlets were least likely to meet all of the Policy requirements.

### Changes in café/kiosk/canteen compliance by Health Service Provider, 2016 and

#### 2018–19 (Table 12)

- Changes in compliance ranged from 0% (no change) to 66.7%
- All HSPs increased the number of cafes/kiosks/canteens meeting one or more requirements of the Policy (offer, display, or promotion).
- EMHS, CAHS and WACHS showed increases in the number of cafes/kiosks/canteens meeting all of the requirements of the Policy (i.e. were fully compliant).



**Table 11. Changes in café/kiosk/canteen compliance by operation, 2016 and 2018–19**

	No. outlets surveyed		No. outlets compliant with offer requirements		No. outlets compliant with display requirements		No. outlets compliant with promotion requirements		No. and proportion of outlets meeting all compliance requirements		% difference in compliance 2016-2018/19
	2016	2018/19	2016	2018/19	2016	2018/19	2016	2018/19	2016	2018/19	
<b>WA Health</b>	12	11	2	9	2	8	5	10	2 (16.7%)	7 (63.6%)	↑ <b>46.9%</b>
<b>Auxiliary</b>	14	18	0	2	0	2	9	14	0 (0.0%)	2 (11.1%)	↑ <b>11.1%</b>
<b>Private</b>	4	23	0	9	0	7	1	19	0 (0.0%)	6 (26.1%)	↑ <b>26.1%</b>
<b>TOTAL</b>	<b>30</b>	<b>52</b>	<b>2 (6.7%)</b>	<b>20 (38.5%)</b>	<b>2 (6.7%)</b>	<b>17 (32.7%)</b>	<b>15 (50.0%)</b>	<b>43 (82.7%)</b>	<b>2 (6.7%)</b>	<b>15 (28.8%)</b>	↑ <b>22.1%</b>

**Table 12. Changes in café/kiosk/canteen compliance by Health Service Provider, 2016 and 2018–19**

Operated by	Total no. of outlets audited		No. of outlets meeting offer requirements		No. of outlets meeting display requirements		No. of outlets meeting promotion requirements		No. outlets meeting all Policy requirements		% difference in compliance 2016-2018/19
	2016	2018/19	2016	2018/19	2016	2018/19	2016	2018/19	2016	2018/19	
<b>EMHS</b>	12	13	0	9	0	8	5	13	0 (0%)	8 (61.5%)	↑ <b>61.5%</b>
<b>NMHS</b>	10	10	2	3	2	3	7	7	2 (20%)	2 (20.0%)	0
<b>SMHS</b>	2	12	0	2	0	0	2	12	0 (0%)	0 (0.0%)	0
<b>CAHS</b>	1	6	0	4	0	5	1	5	0 (0%)	4 (66.7%)	↑ <b>66.7%</b>
<b>WACHS</b>	5	10	0	2	0	1	0	6	0 (0%)	1 (10.0%)	↑ <b>10.0%</b>
<b>DH</b>	1	1	0	0	0	0	0	0	0 (0%)	0 (0.0%)	0
<b>TOTAL</b>	<b>30</b>	<b>52</b>	<b>2 (6.7%)</b>	<b>20 (38.5%)</b>	<b>2 (6.7%)</b>	<b>17 (32.7%)</b>	<b>15 (50.0%)</b>	<b>43 (82.7%)</b>	<b>2 (6.7%)</b>	<b>15 (28.8%)</b>	↑ <b>22.2%</b>

## Compliance in vending machines

**Changes in vending machine compliance by machine type, 2016 and 2018–19**  
(Table 13)

- A greater number of vending machines were audited in 2018–19 (n=158) than in 2016 (n=129).
- Since 2016, a number of vending machines in regional sites have been decommissioned due to lack of funding, inability to comply with the Policy, and hospital redevelopment.
- There was a reduction in ‘food only’ vending machines and an increase in ‘mixed’ (food and drinks) vending machines between 2016 and 2018–19.
- Overall, vending machine compliance increased from 24% to 59.5% (35.5% increase).
- Comparisons are not presented for promotion requirements of the Policy as these data were not considered comparable due to the changes in vending machines.

**Table 13. Changes in vending machine (VM) compliance by machine type, 2016 and 2018–19**

Vending machine type	No. of VMs surveyed		No. VMs meeting offer requirements		No. VMs meeting display requirements		No. VMs meeting both compliance requirements		% difference in compliance 2016-2018/19
	2016	2018/19	2016	2018/19	2016	2018/19	2016	2018/19	
Food only	30	16	2	1	2	1	2 (6.7%)	1 (6.3%)	↓ 0.4%
Drinks only	78	86	28	72	30	81	28 (35.9%)	72 (83.7%)	↑ 47.8%
Hot drinks	27	27	27	27	27	27	27 (100%)	27 (100%)	-
Cold drink	51	59	1	45	3	54	1 (2.0%)	45 (76.3%)	↑ 74.3%
Mixed (food and drinks)	21	56	1	22	1	27	1 (4.8%)	21 (37.5%)	↑ 32.7%
<b>Total</b>	<b>129</b>	<b>158</b>	<b>31 (24.0%)</b>	<b>95 (60.1%)</b>	<b>33 (25.6%)</b>	<b>109 (69%)</b>	<b>31 (24.0%)</b>	<b>94 (59.5%)</b>	↑ 35.5%

**Changes in vending machine compliance by Health Service Provider, 2016 and 2018–19 (Table 14)**

- Changes in compliance varied by HSP and ranged from -8% to 68.3%.
- EMHS and NMHS showed the greatest improvements in vending machine compliance between 2016 and 2018/19.

**Table 14. Changes in vending machine (VM) compliance by Health Service Provider, 2016 and 2018–19**

Operated by	Total no. of VMs audited		No. of VMs meeting offer requirements		No. of VMs meeting display requirements		No. VMs meeting Offer and Display Policy requirements		% difference in compliance 2016-2018/19
	2016	2018/19	2016	2018/19	2016	2018/19	2016	2018/19	
<b>EMHS</b>	23	42	4	36	4	38	4 (17.4%)	36 (85.7%)	↑ <b>68.3%</b>
<b>NMHS</b>	51	50	14	35	14	38	14 (27.55)	35 (70%)	↑ <b>42.5%</b>
<b>SMHS</b>	30	38	9	19	9	22	9 (30.0%)	19 (50.0%)	↑ <b>20.0%</b>
<b>CAHS</b>	3	4	1	2	1	1	1 (33.3%)	1 (25.0%)	↓ <b>8.3%</b>
<b>WACHS</b>	22	24	3	3	5	10	3 (13.6%)	3 (12.5%)	↓ <b>1.1%</b>
<b>DH</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	<b>N/A</b>
<b>TOTAL</b>	<b>129</b>	<b>158</b>	<b>31 (24.1%)</b>	<b>95 (60.1%)</b>	<b>33 (25.6%)</b>	<b>109 (69.0%)</b>	<b>31 (24.0%)</b>	<b>94 (59.5%)</b>	↑ <b>35.5%</b>

N/A not applicable (no vending machine).

## Compliance in ward trolleys (Table 15)

- A small number of ward trolleys were included in each audit and ward trolleys were not systematically audited in every site; therefore, these results are not representative of all sites.
- Due to a lack of 2016 audit data in three HSPs, comparisons are only possible for EMHS and WACHS.

**Table 15. Changes in ward trolley compliance, 2016 and 2018–19**

Operated by*	No. Ward Trolleys audited		No. Ward Trolleys meeting offer requirements		No. Ward Trolleys meeting display requirements		No. Ward Trolleys meeting offer and display Policy requirements		% difference in compliance 2016 to 2018/19
	2016	2018/19	2016	2018/19	2016	2018/19	2016	2018/19	
<b>EMHS</b>	1	1	0	0	0	0	0	0	<b>0%</b>
<b>NMHS</b>	N/A	2	N/A	0	N/A	0	N/A	0	-
<b>SMHS</b>	N/A	1	N/A	1	N/A	1	N/A	1	-
<b>CAHS</b>	N/A	2	N/A	0	N/A	0	N/A	0	-
<b>DH *</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	-
<b>WACHS</b>	2	1	0	0	0	0	0	0	<b>0%</b>
<b>TOTAL</b>	<b>3</b>	<b>7</b>	<b>0</b> <b>(0.0%)</b>	<b>1</b> <b>(14.3%)</b>	<b>0</b> <b>(0.0%)</b>	<b>1</b> <b>(14.3%)</b>	<b>0</b> <b>(0.0%)</b>	<b>1</b> <b>(14.3%)</b>	<b>14.3%</b>

N/A, no data available.

\* there are no ward trolleys at the Department of Health

## Food and drinks offered and displayed in cafés/kiosks/canteens

### Changes in food and drinks on 'offer' in cafés/kiosks/canteens by operation, 2016 and 2018–19 (Table 16)

**Offer policy requirements:** A minimum of 50% of items offered are **Green** food and drinks. A limited number of **Red** food and drinks are offered (no more than 20%). The remainder to be Amber food and drinks.

- Mean percentages of **Green**, **Amber**, and **Red** food and drinks on offer in WA Health, auxiliary (volunteer), and private operated outlets were closer to the minimum standards of the Policy in 2018–19 than in 2016.
- WA Health-operated sites showed the greatest improvements in food and drinks on offer, with an increase of 21% in the average proportion of **Green** items and a decrease of 17% in the average proportion of **Red** items.
- In both the 2016 and 2018–19 audits, auxiliary (volunteer) outlets were the least compliant, although there were improvements in the mean proportions of **Green** and **Red** food and drinks on offer since 2016.

**Table 16. Mean percentages of food and drink on 'offer' in cafés/kiosks/canteens by operation, 2016 and 2018–19**

Operated by	2016 DATA			2018/19 DATA			Change In compliance from 2016-2018/19	
		Green (%)	Amber (%)	Red (%)	Green (%)	Amber (%)		Red (%)
WA Health	Mean	36	30	34	57	30	13	↑ Green 21% ↓ Red 17%
	Range	19-81	19-36	0-53	39-77	15-41	4-20	
Auxiliary	Mean	16	23	61	29	21	50	↑ Green 13% ↓ Red 11%
	Range	4-38	15-41	29-80	0-79	0-39	12-100	
Private	Mean	30	23	47	45	23	32	↑ Green 15% ↓ Red 15%
	Range	22-43	6-35	35-65	14-90	4-35	6-65	

**Changes in food and drink on ‘display’ in cafés/kiosks/canteens by operation, 2016 and 2018–19 (Table 17)**

*Display policy requirements: At least 50% of display area must be occupied by **Green** food and/or drinks; no more than 20% of the display area must be occupied by **Red** food and/or drinks; **Green** Items should be more prominently displayed than other categories.*

- Mean proportions of **Green**, **Amber**, and **Red** food and drinks on display in WA Health, auxiliary (volunteer), and privately operated outlets were closer to the minimum requirements of the Policy in 2018–19.
- WA Health-operated sites showed the greatest improvements in mean percentages of **Green** (21%) and **Red** (-14%) food and drinks on display.
- In both the 2016 and 2018–19 audits, auxiliary (volunteer) outlets were the least compliant, although there have been improvements in the mean percentages of **Green** and **Red** food and drinks on offer since 2016.

**Table 17. Mean percentage of food and drink on ‘display’ in cafés/kiosks/canteens by operation, 2016 and 2018–19**

		2016 DATA			2018/19 DATA			Change In compliance from 2016-2018/19
Operated by		Green (%)	Amber (%)	Red (%)	Green (%)	Amber (%)	Red (%)	
WA Health	Mean	36	36	28	57	29	14	↑ Green 21% ↓ Red 14%
	Range	15-81	19-51	0-58	32-77	15-39	0-31	
Auxiliary	Mean	16	23	61	27	21	52	↑ Green 11% ↓ Red 9%
	Range	4-38	9-39	33-84	0-75	0-38	17-100	
Private	Mean	26	31	42	46	19	35	↑ Green 20% ↓ Red 7%
	Range	20-33	26-40	33-54	9-90	4-40	0-84	

## Food and drink promoted in cafés/canteens/kiosks by operation, 2016 and 2018–19 (Table 18)

*Promotion Policy requirements: only food and drinks with a **Green** classification can be promoted.*

- Overall, there was a 29.1% increase in compliance with promotion requirements.
- WA Health outlets and private outlets showed the greatest increases in compliance with promotion requirements.
- The proportion of cafés/kiosks/canteens promoting **Green** increased by 44.2%

**Table 18. Cafés/kiosks/canteens meeting the promotion requirements of the Policy by operation, 2016 and 2018–19**

Operated by	No. outlets audited		No. and proportion of outlets meeting promotion requirements (compliant)		No. outlets promoting Green only		No. outlets with no promotion		No. outlets promoting Amber or Red (not compliant)		% difference in compliance 2016 to 2018/19
	2016	2018/19	2016	2018/19	2016	2018/19	2016	2018/19	2016	2018/19	
<b>WA Health</b>	12	11	5 (41.7%)	10 (90.9%)	2 (16.7%)	8 (72.7%)	3 (25.0%)	2 (18.2%)	7 (58.3%)	1 (9.1%)	↑ <b>49.2%</b>
<b>Auxiliary</b>	13	18	9 (69.2%)	14 (72.2%)	4 (30.8%)	10 (55.6%)	5 (38.5%)	4 (22.2%)	4 (30.8%)	4 (22.2%)	↑ <b>3%</b>
<b>Private</b>	3	23	1 (33.3%)	19 (82.6%)	0 (0.0%)	17 (73.9%)	1 (33.3%)	2 (8.75)	2 (66.7%)	4 (17.4%)	↑ <b>49.3%</b>
<b>TOTAL</b>	<b>28</b>	<b>52</b>	<b>15 (53.6%)</b>	<b>43 (82.7%)</b>	<b>6 (23.1%)</b>	<b>35 (67.3%)</b>	<b>9 (32.1%)</b>	<b>8 (15.4%)</b>	<b>13 (46.4%)</b>	<b>9 (17.3%)</b>	↑ <b>29.1%</b>



## Food and drink offered and displayed in vending machines

Changes in food and drink on 'offer' by vending machine type, 2016 to 2018–19  
(Table 19)

- Across all vending machine types, the mean percentages of **Green**, **Amber** and **Red** items on offer increased towards meeting the minimum requirements of the Policy in 2018–19.
- 'Cold drink' vending machines showed the greatest increases in the offer of **Green** items in 2018–19 (28%).
- 'Food only' and 'Mixed (food and drinks)' showed the greatest reductions in **Red** items on offer, although these were the least compliant vending machines overall in both audits (on average).
- On average, 'hot drink' vending machines in both audits exceeded the offer requirements of the Policy.

**Table 19. Mean percentage of food and drink on 'offer' in vending machines by type, 2016 to 2018–19**

Vending machine type		2016 DATA			2018/19 DATA			Change In compliance from 2016-2018/19
		Green (%)	Amber (%)	Red (%)	Green (%)	Amber (%)	Red (%)	
Food only	Mean	9	17	74	28	33	39	↑ Green 19% ↓ Red 35%
	Range	0-100	0-41	0-96	0-71	17-55	7-83	
Drinks only	Mean	32	45	23	54	35	11	↑ Green 22% ↓ Red 12%
	Range	0-100	0-100	0-75	0-100	0-100	0-67	
Hot drinks	Mean	60	40	0	74	26	0	↑ Green 14%
	Range	50-100	0-50	0-5	50-100	0-50	0-0	
Cold drinks	Mean	17	48	35	45	39	17	↑ Green 28 % ↓ Red 18 %
	Range	0-100	13-100	0-75	0-60	20-100	0-67	
Mixed (food and drinks)	Mean	15	26	59	37	31	31	↑ Green 22 % ↓ Red 28 %
	Range	8-67	17-32	7-71	0-70	12-50	5-76	

**Changes in food and drink on ‘display’ by vending machine type, 2016 and 2018–19 (Table 20)**

- Significant reductions were seen in **Red** items on display, with decreases ranging from 37% (food) to 19% (cold drinks).
- There were significant increases in the display of **Green** items in 2018–19, with a 21% increase in food and 18% increase in cold drink and mixed vending machines (noting that hot drink vending machines do not have a display component and have not been included in display assessments).

**Table 20. Mean percentage of food and drink on ‘display’ in vending machines by type, 2016 and 2018–19**

Vending machine type		2016 DATA			2018/19 DATA			Change In compliance from 2016-2018/19
		Green (%)	Amber (%)	Red (%)	Green (%)	Amber (%)	Red (%)	
Food only	Mean	8	18	73	29	35	36	↑ Green 21% ↓ Red 37%
	Range	0-100	0-47	0-97	0-71	19-61	7-81	
Cold drinks	Mean	28	40	32	46	29	13	↑ Green 18% ↓ Red 19%
	Range	0-100	7-100	0-75	0-71	0-50	0-40	
Mixed (food and drinks)	Mean	22	24	48	40	32	28	↑ Green 18% ↓ Red 20%
	Range	8-69	15-32	5-63	0-63	13-48	4-73	

\*Hot drink vending machines do not display drinks and are not included

## Food and drinks offered, displayed and promoted in ward trolleys

### Changes in food and drink offered, displayed and promoted in ward trolleys, 2016 and 2018–19 (Table 21)

- In 2018–19, ward trolleys showed a wide range of **Green**, **Amber**, and **Red** food and drink offered and displayed compared to 2016.
- Overall, ward trolleys in 2018–19 showed improvements towards policy compliance. The average proportion of **Green** food and drinks items offered and displayed increased by 20%, and the average proportion of **Red** items offered and displayed, decreased by 17% and 16%, respectively.
- All ward trolleys in 2016 and 2018–19 were compliant with the promotion requirements of the Policy.
- The small number of ward trolleys audited means these results should be interpreted with caution.

**Table 21. Changes in compliance in ward trolleys (all health services), 2016 to 2018–19**

	Offered						Displayed						Change In compliance 2016-2018/19	
	2016			2018/19			2016			2018/19			Offer	Display
	Green (%)	Amber (%)	Red (%)	Green (%)	Amber (%)	Red (%)	Green (%)	Amber (%)	Red (%)	Green (%)	Amber (%)	Red (%)		
<b>Mean</b>	6	22	72	26	18	55	6	22	72	26	18	56	↑ Green 20% ↓ Red 17%	↑ Green 20% ↓ Red 16%
<b>Range</b>	0-13	20-25	67-75	3-60	0-41	19-79	0-13	20-25	67-75	3-60	0-41	19-97		

## Qualitative findings

WASCA conducted in-depth interviews with 27 food/drink outlet representatives during each site visit, including catering and café managers, kiosk managers, volunteer staff, auxiliary coordinators, external contractors, and staff wellness committee members. Questions were asked relating to policy understanding, policy implementation, successes and achievements, use of implementation resources, compliance monitoring, catering, fundraising and promotion activities, and changes implemented post-2016.

### Policy understanding and experience

Policy awareness among food outlet managers (metropolitan and regional):

- 52% had a 'good' understanding of the Policy;
- 26% had a 'very good' understanding of Policy.

Policy awareness among other outlet staff and volunteers:

- 57% of metropolitan managers reported that their staff and volunteers had a 'good' level of Policy understanding;
- 69% of regional outlet managers reported that their staff and volunteers had 'satisfactory' Policy awareness;
- 23% of regional and 14% of metropolitan outlet managers said that staff and volunteers had a 'poor' understanding of the Policy.

Experiences implementing the Policy (metropolitan and regional):

- 37% of respondents had positive experiences implementing the Policy;
- 25% of respondents had a challenging experience implementing the Policy.

### Confidence with implementing the Policy

- 43% of metropolitan respondents were either 'very confident' or 'fairly confident' in implementing the Policy.
- The majority of regional respondents were 'fairly confident' (69%).

### Barriers and enablers of policy implementation

The top three barriers and enablers of policy implementation reported by metropolitan and regional respondents were the same (**Figure 2 and 3**).

## Barriers

The most commonly reported barrier was the potential for 'profit loss' (78%). There was a perception that **Red** and **Amber** food items generate a greater margin of profit and sell more, compared to healthier food:

*"Amber and Red foods are often more attractive, cheaper and more convenient".*

*"Healthier products are available, but they don't sell, therefore they go to waste".*

*"A small percentage of customers want healthier options. Lower fat/healthier options approved products are more expensive, but the café can't justify the increase in price of the item".*

The majority (66%) of respondents mentioned that sourcing products that align with the Policy could be a challenge.

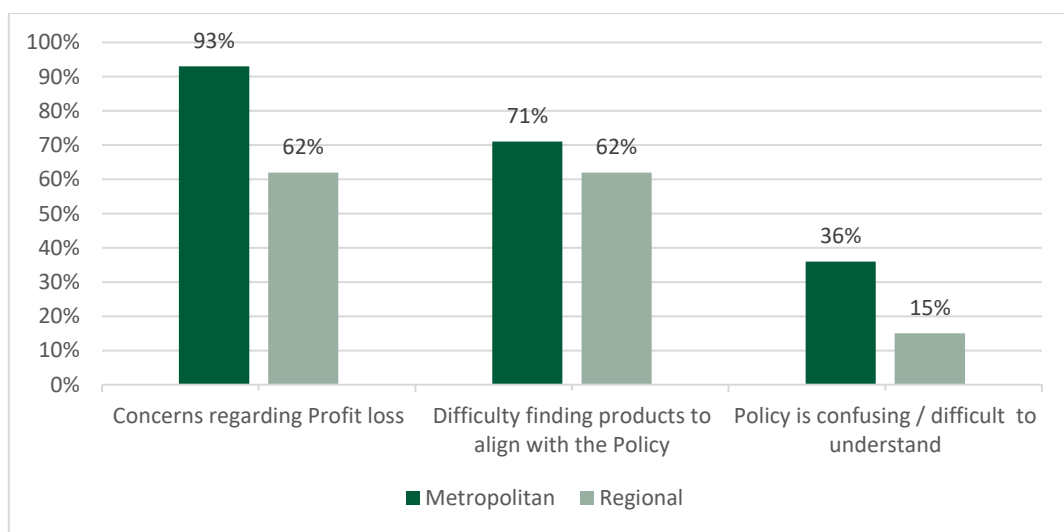
*"Vending machine products are challenging".*

*"Vending machine slots are not large enough to house certain goods and turn around in vending machines is too small to have fresh products in the machine".*

*"There are logistic issues involved with vending machines which add additional barriers e.g. product size, whether the product will smash when it drops, in addition to having to classify them under the policy".*

A small number (n=7, 25%) of respondents cited the Policy as being 'confusing/difficult to understand'.

**Figure 2. Top three enablers of policy implementation reported by food outlets**



## Enablers

The majority of the 25 respondents felt that support from dietitians/health promotion staff and health service providers (73%); in addition, support from hospital management (48%) helped them to implement the Policy.

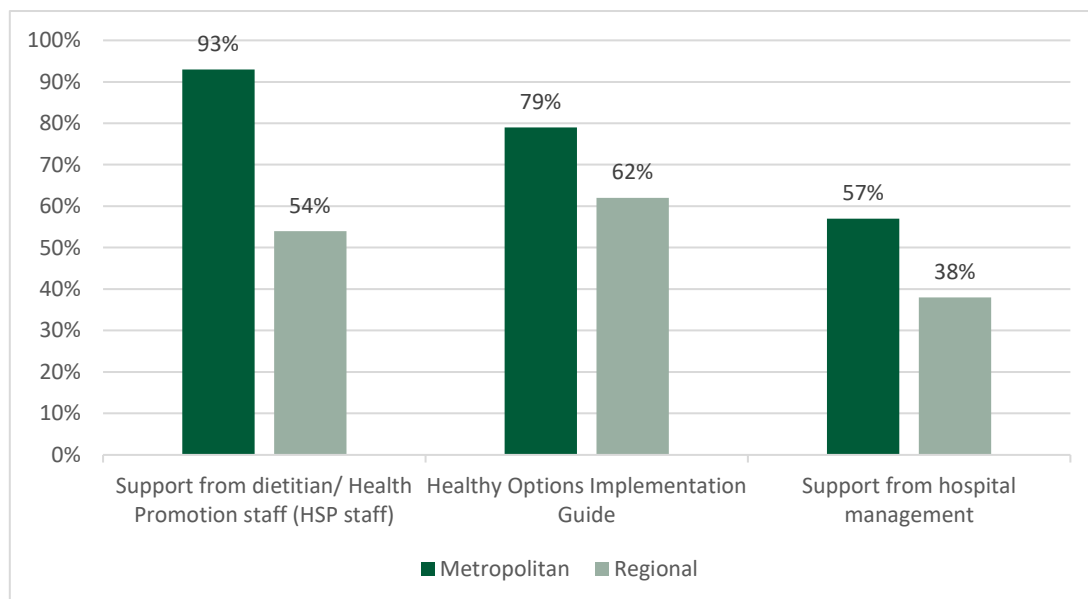
*“It helps when things come from the top down. It provides momentum and makes it a priority”.*

*“The dietetics team and health promotion staff have been crucial in assisting sites to implement the Policy”.*

*“Interpretation of the Policy is difficult without dietitian guidance, and even then it is difficult...”*

The majority (71%) of respondents mentioned that the Healthy Options Implementation Guide was helpful when implementing the Policy. A number of sites mentioned using a ‘product classification guide’ developed by one HSP, but this guide is not endorsed or recognised as a Healthy Options WA Policy support resource by CDPD as it does not fully align with nutrient criteria in the Implementation Guide.

**Figure 3. Top three enablers of policy implementation reported by food outlets**



## Successes

Eight metropolitan sites and six regional site representatives answered questions regarding successes/ achievements with implementation of the Policy in their outlet. Some responses included:

*“Collaboration between auxiliary, Population Health, the Department, and suppliers have made the changes possible”.*

*“Education of staff involved in ordering the food and support from upper management has helped”.*

*“There have been many positive comments from the staff around the variety of fresh, healthy options offered at the staff canteen”.*

*“Colour coded catering menu, staff now instantly are choosing **Green** for catering”.*

Ten metropolitan sites and six regional site representatives answered questions regarding customer feedback on the Policy and the food and drinks offered in their outlet. Sixty-nine per cent (69%) indicated they had received positive feedback about the quality of the food, freshness and options available. Positive comments from sites included:

*“Many compliments from customers about how healthy the food is”.*

*“The kiosk owner believes that fresh is best and often gets compliments about the freshness and healthiness of what is on offer”.*

*“Since the new owner took over, the options have been better, and the feedback has been good around that”.*

## Tools and resources

Site representatives were asked to comment on how useful they found existing tools and resources to support implementation of the Policy (Table 22).

- The majority (62.3%) of metropolitan and regional respondents were unaware of the Healthy Options WA Policy tools and resources.
- More regional respondents (73.7%) who were aware of these resources reported finding the Healthy Options WA resources as useful than respondents from metropolitan sites (26.3%).
- The *Healthy Options Implementation Guide* was reported as the most useful resource (57.7%), followed by *Healthy Options Information Sheets* (37.0%) and the *Commonly Supplied Food and Drink Guide* (34.4%).

**Table 22. Reported usefulness of Healthy Options WA Policy tools and resources**

Tool/ resource	Useful			Not Useful			Unaware of resource			Overall Total
	Metro	Regional	Sub Total	Metro	Regional	Sub Total	Metro	Regional	Sub Total	
Commonly supplied food and drink guide	1	7	8 (34.4%)	2	1	3 (13.6%)	6	5	11 (50.0%)	22
Self-assessment tool for monitoring compliance	1	6	7 (26.0)	1	0	1 (3.7%)	12	7	19 (70.4%)	27
Healthy Options Information sheets	2	8	10 (37.0%)	1	0	1 (3.7%)	11	5	16 (59.3%)	27
Healthy Options tips and resources to promote and sell Green Items	2	7	9 (33.3%)	0	0	0 (0.0%)	12	6	18 (66.7%)	27
Healthy Options Implementation guide	7	8	15 (57.7%)	2	1	2 (7.7%)	5	4	9 (34.6%)	26
Healthy Options Quarterly e-newsletter	1	1	2 (7.4%)	0	0	0 (0.0%)	13	12	25 (92.6%)	27
Healthy Options Website	1	5	6 (23.1%)	3	1	4 (15.4%)	9	7	16 (61.5%)	26
<b>Totals</b>	<b>15 (26.3%)</b>	<b>42 (73.7%)</b>	<b>57 (31.1%)</b>	<b>9 (75%)</b>	<b>3 (25%)</b>	<b>12 (6.6%)</b>	<b>68 (59.6%)</b>	<b>46 (40.4%)</b>	<b>114 (62.3%)</b>	<b>183</b>



## Ongoing monitoring

Site representatives were asked if regular reporting on progress, changes implemented, and/or policy compliance would assist food and drink outlets.

- The majority of the 14 metropolitan respondents (79%) and 31% of 4 regional respondents answered 'yes'.

For those who answered 'yes', the majority of metropolitan sites' (67%) first preference was to report quarterly, whereas the majority of regional sites (50%) preferred biannual reporting. The second preference for both metropolitan and regional sites was reporting annually.

## Professional and business catering

Thirteen metropolitan and 13 regional site representatives provided feedback on professional and business catering offered by their outlets:

- 79% metropolitan sites and 31% regional sites offered catering for onsite functions and meetings. Of these:
  - 36% metropolitan and 23% regional respondents reported 'always' complying with the Policy;
  - 45% of metropolitan and 8% of regional sites reporting 'sometimes' complying with the Policy.

Respondents were asked if catering was provided by an outside provider for onsite functions, meetings, or events. Overall:

- 59% responded 'yes';
- 21% responded 'no';
- 26% responded 'don't know'.

If respondents answered yes, they were asked to comment (to the best of their knowledge) on how often the outside provider complied with the Policy. Of these, 36% of regional sites and none of the metropolitan sites responded they 'always' complied with the Policy'. Fifty per cent of regional and no metropolitan sites reported 'sometimes' complying with the Policy.

Representatives were asked if their food outlets were engaged in fundraising activities.

- Of the 13 metropolitan respondents, 27% answered 'yes', 45% responded 'no', and 18% 'don't know'.
- Of the 10 regional respondents, 23% responded 'yes', and 69% responded 'no', and 8% 'don't know'.

If respondents answered yes, and they were food-based fundraising activities, they were asked if they complied with the Policy. All regional respondents said 'sometimes' and 33% of metropolitan respondents said rarely.

## Changes to policy implementation since the 2016 audit

### Cafés, kiosks and canteens

Of the 26 site representatives who responded to this question, 100% of metropolitan and 62% of regional representatives reported having made changes in their outlets to implement the Policy. For example:

- 100% of metropolitan and 75% of regional respondents reported they decreased the offer of **Red** foods and drinks.
- 77% of the metropolitan and 63% of regional respondents reported they increased the number of **Green** foods and drinks on offer.
- 92% of metropolitan respondents and 63% of regional respondents reported they decreased the number of **Red** items on display.
- 75% of regional and 54% of metropolitan respondents reported they increased the number of **Green** items on display.
- Overall, 36% of outlets increased the promotion of **Green** foods and drink and 18% of outlets decreased the promotion of **Red** items.

Other reported changes included:

- "Changing signage";
- "Free water with salad for staff";
- "Posters promoting **Green** items".

### Vending machines

Of the 24 site representatives who responded to this question, 71% of metropolitan respondents and 46% of regional respondents reported having made changes to vending machines to implement the Policy. For example:

- 100% of regional and 90% of metropolitan respondents reported increasing **Green** food and drinks on offer.
- 100% of metropolitan and 64% of regional respondents reported decreasing **Red** food and drinks on offer.
- 90% of metropolitan and 83% of regional respondents reported increasing the number of **Green** foods and drinks on display.
- 100% of metropolitan and 50% of regional respondents reported reducing the number of **Red** foods and drinks on display.
- 32% of outlets increased the number of **Green** food and drinks items promoted in vending machines (through changing vending machine skins/covers).

- 33% of regional respondents reporting decreasing the number of **Red** items promoted. Metropolitan vending machine sites reporting no changes.

The majority of respondents reported no changes to café/canteen/kiosk or vending machine contracts since 2016.

### **Ward trolleys**

Eighteen representatives responded to the question if there had been any changes to ward trolleys since 2016. All (100%) of the metropolitan and 31% of regional respondents said 'yes'. These changes mostly involved decreasing **Red** food and drinks and increasing **Green** foods and drinks offered and displayed by ward trolleys.

### **Marketing and promotion**

Overall 26% of sites (metropolitan and regional) reported having implemented or trialed promotional marketing strategies for healthy foods and drink options. For example:

*“Vending machine skins (decals)”*

*“Healthy Options table talkers”*

*“Vetting promotion of **Red** food, changing photos around venue’s internal promotion”*

*“Promotion of **Green** items at point of sale, removed all **Red** and **Amber** advertising, fridges are not branded, and ice cream fridges are gone”*

## Discussion

The *Healthy Options WA: Food and Nutrition Policy for WA Health Services and Facilities* aims to improve the health of staff, visitors, patients, and the broader community, by supporting health care environments to offer, display, and promote nutritious healthy eating options and limit the provision and promotion of energy dense nutrient-poor food and drink.

The 2018–19 audit provides essential information on the status of compliance with the Policy throughout WA Health services and facilities during November 2018–January 2019. While there remains room for improvement in achieving full compliance with the Policy across individual sites, significant improvements and progression toward policy compliance have been made. These improvements are encouraging and reflect the work being done across WA Health sites and efforts by HSPs to support policy implementation within WA Health services and facilities.

Overall, there was a 22% increase in the number of compliant cafés/kiosks/canteens since 2016, with more marked improvements in some health service areas. For example, East Metropolitan Health Service (with the greatest number of audited outlets) increased its number of compliant cafés/kiosks/canteens by 61.5% since the 2016 audit. The Child and Adolescent Health Service increased its number of compliant cafés/kiosks/canteens by 66.7% (although it should be noted that this is based on one audited site that was replaced with a new children's hospital in 2018). Based on feedback from outlet operators, these improvements have mostly been achieved by decreasing the offer and display of **Red** food and drink items, followed by increasing **Green** items and to a lesser extent, increasing the promotion of **Green** items. WA Health-operated outlets were more likely than auxiliary (volunteer) and privately-operated outlets to align with the Policy in 2018–19.

Across all sites there was a 35% increase in the number of compliant vending machines, with the greatest improvements in East Metropolitan Health Service and North Metropolitan Health Service. The most significant improvements were observed in cold drink vending machines, with compliance up from 2% in 2016 to 76% in 2018–19. Anecdotal reports indicate that changing the composition of drinks in vending machines e.g. reducing **Red** drinks and increasing the availability of water (**Green**) provides a 'quick win' for achieving compliance, along with changes in vending machine skins to those that promote water rather than sugary drinks. Feedback also suggests that vending machine suppliers have generally been amenable to these changes.

Generally, there is a moderate level of awareness and understanding of the Policy although this could be improved. There also remain some perceived barriers to implementing the Policy. The most commonly perceived barrier is a potential loss of profits if fewer **Red** food and drinks are offered/displayed. The CDPD will work with HSPs to

source and disseminate successful examples where reductions in the offer and display of **Red** food and drinks have been made without sales or profit loss, as has been achieved in other jurisdictions. For example, a trial conducted in the main fully-serviced café in the Alfred Hospital (Victoria) demonstrated that removing **Red** drinks (e.g. sugary drinks) from display led to a 28% decrease in **Red** drinks sales, a 22% increase in **Amber** drinks sales, and a 19% increase in **Green** drinks sales, but there was no significant change in total drinks sales<sup>7</sup>.

The most commonly perceived enablers of policy implementation reported by food outlet staff were receiving support from health promotion and dietetic staff, use of the Policy Implementation Guide, and support for the Policy from hospital management. This highlights the critical nature of having access to local professional support and resources to implement the Policy, as well as leadership that sets clear expectations around policy compliance.

During the audit planning process, some gaps in continuity of support for food outlets were identified. Some HSPs had a staff member dedicated to implementing the Policy (or a point of contact) but in many regional and some metropolitan sites, a dedicated contact was difficult to identify. A *Healthy Options Policy* 'champion' for each HSP may be required to strengthen networks and knowledge exchange and to help increase policy compliance.

A significant proportion of site representatives were unaware of the existing resources available to support Policy implementation, and this is an area that requires attention. Those who did report using these resources generally found them useful (particularly regional staff). The Department will continue to develop and update tools and resources to support policy implementation in food outlets, vending machines, professional and business catering, and fundraising initiatives, with a focus on areas highlighted in this audit. Two areas that would benefit from particular focus are compliance with the Policy in relation to professional and business catering, and prizes, events and fundraising.

Since the audits, WASCA has provided site-specific feedback and offered support to each HSP to continue improvements in policy compliance. HSPs have been providing targeted support to outlet managers and vending machine suppliers in their catchment areas to implement WASCA's recommendations. Some specific actions taken by HSPs include:

- investigating a strengthening of the Policy within their own catchment to include further restrictions on **Red** food and drinks
- voluntary removal of **Red** sugary drinks (or investigating feasibility)
- working with food outlet managers to improve the nutrient profile of recipes

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<sup>7</sup> Alfred Health. Drinks trials. Alfred Health, Melbourne; 2017. Available from: <https://www.alfredhealth.org.au/about/healthy-communities/healthy-food/drinks-trials>

- educating vending machine suppliers and auxiliary groups on how to replace **Red** food and drink with **Green** and **Amber** products
- conducting additional in-house audits
- identifying a Policy champion to advance policy implementation

The Department will continue to support HSPs by further refining its policy implementation tools and resources, with a focus on the least compliant operators, fundraising and prizes/events, and increasing Policy awareness. The CDPD will continue to disseminate tools and resources through the *Healthy Options WA Policy* website, the *Healthy Options WA* e-newsletter, the *Healthy Options WA Implementation Group* on Yammer, and other existing networks. Some additional actions currently under consideration by CDPD (to occur in partnership with HSPs) include development of new Policy promotion and marketing resources; development of interactive online policy education resources; dissemination of successful examples of policy implementation; and adaptation of audit tools to support continuous self-auditing.

## Strengths and limitations

A major strength of the 2018–19 audit is being able to compare results with the 2016 audit. However, it is acknowledged that there have been changes in the number or type of food outlets in some sites since the previous audit (e.g. Princess Margaret Hospital for Children was decommissioned and replaced by the new Perth Children’s Hospital in 2018). The 2018–19 audits were conducted by an independent not for profit organisation (WASCA) with appropriate skills and experience in the food service setting, reducing the likelihood of self-reporting bias. The methods used in both audits have been maintained as closely as possible to support appropriate comparisons.

It was not feasible (due to travel time, costs and short audit timeframe) to conduct audits in every metropolitan and regional site with food and drinks outlets across Western Australia. Selection criteria were applied to ensure balanced representation by metropolitan and regional sites and to capture the largest sites having the greatest number of staff, visitors and patients. An additional five sites were included in the 2018–19 audit.

In assessing food and drinks according to the traffic light system, some assumptions were necessary with regard to cooking methods or ingredients. Protocols were developed to ensure consistent decision making. However, misclassification of some food and drinks cannot be ruled out, particularly where items did not have product information. Some items may have been inadvertently misclassified by food outlet staff due to misinterpretation of policy implementation resources. Site representatives who answered questions regarding fundraising and catering may have different views to other staff working at WA Health facilities. A systematic auditing process to assess professional and business catering and fundraising against the Policy is being considered for future audits. Finally, the findings of

this audit are based on the food and drinks offered, displayed and promoted in sites on the day of the site audit and these are subject to change.

## Conclusion

There have been some significant improvements toward compliance with the *Healthy Options WA: Food and Nutrition Policy for WA Health Services and Facilities* across food outlets and vending machines, reflecting the work being done across WA Health sites to support policy implementation. However, at the time of these audits, full compliance with the policy across individual sites was not achieved. This audit has identified some key barriers and enablers of policy implementation, which represent future opportunities for improvement, and the Department will continue to work with HSPs to support policy implementation. The findings from the 2018–19 statewide audit have informed an in-depth review and strengthening of the Policy to take effect in the second half of 2020.

# Appendix 1 – 2018–19 Healthy Options WA Policy audit of compliance assessment tool - metropolitan



Government of **Western Australia**  
Department of **Health**



## Healthy Options - site visit tool

*Note: Section A, B, C, D to be completed by WASCA in consultation with main site contact e.g. procurement manager/manager of general services*

SECTION A - contact details

**Site name:** \_\_\_\_\_

**Main site contact:** \_\_\_\_\_ **Position title:** \_\_\_\_\_

**Contact number:** \_\_\_\_\_ **Email:** \_\_\_\_\_

**Visit date:** \_\_\_\_\_ **Time:** \_\_\_\_\_

**Food and drink outlets onsite:**

Food environment	Number of outlets/machines	Outlet details (e.g. name of café; snack/drink machine)	Managed
Café/canteen/kiosk			<input type="checkbox"/> internally (DOH) <input type="checkbox"/> external contractor (Private) <input type="checkbox"/> auxiliary/volunteer group <input type="checkbox"/> both <input type="checkbox"/> unknown <input type="checkbox"/> not applicable
			<input type="checkbox"/> internally (DOH) <input type="checkbox"/> external contractor (Private) <input type="checkbox"/> auxiliary/volunteer group <input type="checkbox"/> both <input type="checkbox"/> unknown <input type="checkbox"/> not applicable
Vending machines			<input type="checkbox"/> internally (DOH) <input type="checkbox"/> external contractor (Private) <input type="checkbox"/> auxiliary/volunteer group <input type="checkbox"/> both <input type="checkbox"/> unknown <input type="checkbox"/> not applicable



Ward trolley			<input type="checkbox"/> internally (DOH) <input type="checkbox"/> external contractor (Private) <input type="checkbox"/> auxiliary/volunteer group <input type="checkbox"/> both <input type="checkbox"/> unknown <input type="checkbox"/> not applicable
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**Additional contact people (e.g. vending machine supplier, auxiliary manager, café/canteen/kiosk manager):**

Name: \_\_\_\_\_ Position: \_\_\_\_\_  
 Phone: \_\_\_\_\_ Email: \_\_\_\_\_  
 Name: \_\_\_\_\_ Position: \_\_\_\_\_  
 Phone: \_\_\_\_\_ Email: \_\_\_\_\_  
 Name: \_\_\_\_\_ Position: \_\_\_\_\_  
 Phone: \_\_\_\_\_ Email: \_\_\_\_\_

**Additional comments:**

*For example: WA Health staff had previous contact with the site including a review of vending machines; or no previous contact with this site; is this a typical day of operation etc.* \_\_\_\_\_

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**1. Please describe your level of understanding of the Policy?**

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Very good	Good	Satisfactory	Poor	Very poor

**2. How would you describe Policy awareness of your staff and/or volunteers?**

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Very good	Good	Satisfactory	Poor	Very poor

*The following questions relate to the changes that have taken place to food and drink outlets since the last state wide survey in late 2016.*

**3. Has your experience in implementing the Policy been:**

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Very positive	Positive	Neutral	Challenging	Very Challenging/ Difficult

**Please tell us more about your experience:**

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**4. How confident are you in implementing the Policy?**

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Very confident	Fairly confident	Neither	Not very confident	Not at all confident

**5. What would increase your confidence?**

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**6. Which of the following, if any, have been barriers to you or your site in implementing the Policy? (select all that apply)**

- Lack of support from hospital management (i.e. executive level leadership)
- Lack of time to implement the Policy
- Lack of support from other staff i.e. no collaboration or committee
- Policy was confusing and/or difficult to understand
- Difficulty finding products to align with the policy
- Concern regarding loss of profits
- No real challenges
- Other (add comments below)

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**7. Which of the following has helped you to implement the Policy? (select all that apply)**

- Support from hospital management (i.e. executive level leadership)
- Support from other staff
- Allocated time to implement the Policy
- Understanding of the Policy
- Healthy Options Implementation guide
- Support from dietitian/Health Promotion staff (HSP staff)
- Healthy Options website resources
- Employee Wellness Committee
- Suppliers offering suitable products
- Strong leadership to implement the policy
- Other (add comments below)

---

---

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**8. Would you like to share any successes or achievements relating to implementation of the Policy? This information will be used to inform the upcoming policy review and subsequent supporting material developed to assist with implementation and compliance of the policy.**

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**9. Has there been any feedback from customers/visitors to your site about adopting the Healthy Options WA Policy and/or the food and drinks available?**

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**10. How useful have you found following tools and resources for implementing the Policy?**

Resource	1	2	3
	Unaware of resource	Not useful	Useful
Healthy Options Implementation Guide	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Healthy Options website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Commonly Supplied Food and Drink Guide	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Self-assessment tool for monitoring compliance (found on the Healthy Options website and in Implementation guide)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Healthy Options Information sheets	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Healthy Options tips and resources to promote and sell <b>Green</b> items	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Healthy Options quarterly e-newsletter	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Would you like to be on the e-newsletter mailing list	<input type="checkbox"/> Yes		<input type="checkbox"/> No

**Did you use any other tools to implement the Policy?**

Yes       No       Maybe

Please provide further details:

---



---



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**11. Would you like to suggest any additional resources that could be developed that would assist you to implement the Policy?**

---



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**12. Would regularly reporting on progress, changes implemented and/or Policy compliance help to improve your compliance with the Policy on your site?**

- Yes     Maybe     No

**If yes or maybe, how often?**

- Monthly     Quarterly     Biannually     Annually

**13. Do the outlets onsite provide catering for onsite functions, meetings or events?**

- Yes     No     Don't know

If yes, does the catering comply with the Policy? i.e.: Offers at least 50% **Green** food and drink options and where practical, offers no more than 20% of food and drinks in the **Red** category.

- Always know     Sometimes     Rarely     Never     Don't know

If yes, request a copy of the menu if available.

**14. Is catering provided by an outside provider for onsite functions, meetings and events?**

- Yes     No     Don't know

If yes, does the catering comply with the Policy? i.e.: Offers at least 50% **Green** food and drink options and where practical, offers no more than 20% of food and drinks in the **Red** category.

- Always know     Sometimes     Rarely     Never     Don't know

**15. Is the site engaged in any fundraising initiatives?**

- Yes     No     Don't know

**If yes, what are they?**

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If yes and food-based fundraising activities, do they comply with the Policy? i.e.: does not use food or drinks from the **Red** category and prizes donated/sponsored by companies and businesses comprise a minimum of 50% **Green** food and drinks.

- Always       Sometimes       Rarely       Never       Don't know

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SECTION C – food environments

*Note: if section C is completed in consultation with a different person to sections A and B, please ask question 9 (resources) again.*

1. In general, have changes been made to the café/canteen/kiosk(s) since 2016?

- Yes     No     Don't know

If yes, have changes been made to: (select all that apply)

**a) Food and drinks on offer**

- increase **Green** items       decrease **Red** items  
 other (please add comments)

---

**b) Display of food and drinks**

- increase **Green** items on display     decrease **Red** items on display  
 other (please add comments)

---

**c) How food and drinks are promoted**

- increase promotion **Green** items     decrease promotion of **Red** items  
 other (please add comments)

---

**d) Contracts**

- contract revised (e.g. statement about complying with the Policy is included).

Please describe changes: \_\_\_\_\_

2. In general, have changes been made to the vending machine(s) since 2016?

- Yes       No    Don't know

If yes, have changes been made to: (select all that apply)

**a) Food and drinks on offer**

- increase **Green** items       decrease **Red** items  
 other (please add comments)
- 

**b) Display of food and drinks**

- increase **Green** items on display     decrease **Red** items on display  
 other (please add comments)
- 

**c) How food and drinks are promoted**

- increase promotion **Green** items    decrease promotion of **Red** items  
 other (please add comments)
- 

**d) Contracts**

- contract revised (e.g. supplier changes; statement about complying with the Policy is included etc.). Please describe changes: \_\_\_\_\_
- 
- 

3. In general, have changes been made to the ward trolleys(s) since 2016?

- Yes       No    Don't know

If yes, have changes been made to: (select all that apply)

**a) Food and drinks on offer**

- increase **Green** items       decrease **Red** items  
 other (please add comments)
- 

**b) Display of food and drinks**

- increase **Green** items on display     decrease **Red** items on display  
 other (please add comments)
- 

**c) How food and drinks are promoted**

- increase promotion **Green** items     decrease promotion of **Red** items  
 other (please add comments)
- 

**Marketing and promotion**

**4. Have you implemented or trialled any promotional or marketing strategies? (e.g.**

**Red** items taken off display, colour coded menu boards, vending machine shells replaced  
etc.)

- Yes     No     Don't know

**If yes, please provide examples:** \_\_\_\_\_







## Appendix 2 – 2018–19 Healthy Options WA Policy audit of compliance assessment tool – regional



Government of **Western Australia**  
Department of **Health**



### Healthy Options Project- Regional site visit

#### OVERVIEW AND INSTRUCTIONS FOR WACHS STAFF

*Note: Section A, B, C and D to be completed by WACHS*

The **Healthy Options WA Food and Nutrition Policy** referred to as **the Policy** throughout

Thank you for working with WASCA to support WA health sites in implementing the Healthy Options WA Policy. The goal of your site visit is to gather information to assist WASCA in determining if the site is compliant with the Policy, what further support would help sites to increase compliance with the Policy and any changes that sites may have made since 2016.

#### Prior to site visit:

- Please ensure that all site staff involved are aware of your site visit (e.g. catering manager, auxiliary staff/volunteers)
- Contact WASCA to discuss any queries or issues. WASCA will provide any relevant comments or recommendations from the 2016 statewide survey (if available)
- **There is an electronic option available for completion of sections A, B and C. To use this option, you will need a tablet device with mobile data. Should you wish to use this option, please contact XXXXX using the contact details below and further instructions will be sent to you.**

#### Site visit Assessment Tool

Please complete **one** assessment tool per site, during site visit:

- Section A:
  - collect contact and site details
- Sections B & C:
  - frame your questions in a positive way
  - if the person you are meeting with is unable to answer any of the questions, please ask them to provide a phone number and/or email address of the best person to contact
  - try to elicit any positive experiences or challenges to implementation and capture any changes which have been made since the 2016 survey
- Section D:

In this section, WASCA needs you to collect photos, menu lists and recipes which will assist them to determine if the food and/or drink outlets are compliant with the Policy. Please:

- take photographs that are clear and ensure all items are visible (multiple photographs may be required)
- name an overarching folder using the site name (e.g. Broome Health Service)
- create sub-folders for each outlet – name accordingly and include location (e.g. VendingMachine1\_Emergency) – save photographs within these sub-folders
- record as much information as possible regarding products and menu items, in addition to photos (e.g. is the product deep fried? is the cheese or milk reduced fat? what is the serve size?)
- if you are unable to take photos, use pages 10 to 12 to record all items on offer and displayed. You may require multiple pages for the same outlet e.g. print three pages for a café to take with you

Where to from here?

- Contact WASCA following your site visit to discuss any queries or issues
- Please send all sections of the **Site Visit Assessment Tool** and **photographs, by email** to WASCA by **Friday 10th December, 2018**
- Please note, if your email exceeds 10MB in size, send photographs in multiple emails with the site name in the subject line and include a list of attached photographs/file names in the body of the email

Contact WASCA

XXXXXXXX

## Healthy Options - site visit tool

*Note: Section A, B, C, D to be completed by WACHS in consultation with main site contact e.g. procurement manager/manager of general services*

SECTION A - contact details
-----------------------------

**Site name:** \_\_\_\_\_

**Main site contact:** \_\_\_\_\_ **Position title:** \_\_\_\_\_

**Contact number:** \_\_\_\_\_ **Email:** \_\_\_\_\_

**Visit date:** \_\_\_\_\_ **Time:** \_\_\_\_\_

**Food and drink outlets onsite:**

Food environment	Number of outlets/machines	Outlet details (e.g. name of café; snack/drink machine)	Managed
Café/canteen/kiosk			<input type="checkbox"/> internally (DOH) <input type="checkbox"/> external contractor (Private) <input type="checkbox"/> auxiliary/volunteer group <input type="checkbox"/> both <input type="checkbox"/> unknown <input type="checkbox"/> not applicable
			<input type="checkbox"/> internally (DOH) <input type="checkbox"/> external contractor (Private) <input type="checkbox"/> auxiliary/volunteer group <input type="checkbox"/> both <input type="checkbox"/> unknown <input type="checkbox"/> not applicable
Vending machines			<input type="checkbox"/> internally (DOH) <input type="checkbox"/> external contractor(Private) <input type="checkbox"/> auxiliary/volunteer group <input type="checkbox"/> both <input type="checkbox"/> unknown <input type="checkbox"/> not applicable
Ward trolley			<input type="checkbox"/> internally (DOH) <input type="checkbox"/> external contractor(Private) <input type="checkbox"/> auxiliary/volunteer group <input type="checkbox"/> both <input type="checkbox"/> unknown <input type="checkbox"/> not applicable



**16. Please describe your level of understanding of the Policy?**

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Very good	Good	Satisfactory	Poor	Very poor

**17. How would you describe Policy awareness of your staff and/or volunteers?**

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Very good	Good	Satisfactory	Poor	Very poor

*The following questions relate to the changes that have taken place to food and drink outlets since the last state wide survey in late 2016.*

**18. Has your experience in implementing the Policy been:**

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Very positive	Positive	Neutral	Challenging	Very Challenging/ Difficult

**Please tell us more about your experience:**

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**19. How confident are you in implementing the Policy?**

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Very confident	Fairly confident	Neither	Not very confident	Not at all confident

**20. What would increase your confidence?**

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**21.7. Which of the following, if any, have been barriers to you or your site in implementing the Policy? (select all that apply)**

- Lack of support from hospital management (i.e. executive level leadership)
  - Lack of time to implement the Policy
  - Lack of support from other staff i.e. no collaboration or committee
  - Policy was confusing and/or difficult to understand
  - Difficulty finding products to align with the policy
  - Concern regarding loss of profits
  - No real challenges
  - Other (add comments below)
- 
- 

**8. Which of the following has helped you to implement the Policy? (select all that apply)**

- Support from hospital management (i.e. executive level leadership)
  - Support from other staff
  - Allocated time to implement the Policy
  - Understanding of the Policy
  - Healthy Options Implementation guide
  - Support from dietitian/Health Promotion staff (HSP staff)
  - Healthy Options website resources
  - Employee Wellness Committee
  - Suppliers offering suitable products
  - Strong leadership to implement the policy
  - Other (add comments below)
- 
- 

**9. Would you like to share any successes or achievements relating to implementation of the Policy? This information will be used to inform the upcoming policy review and subsequent supporting material developed to assist with implementation and compliance of the policy.**

---

---

**10. Has there been any feedback from customers/visitors to your site about adopting the Healthy Options WA Policy and/or the food and drinks available?**



**11. How useful have you found following tools and resources for implementing the Policy?**

Resource	1	2	3
	Unaware of resource	Not useful	Useful
Healthy Options Implementation Guide	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Healthy Options website	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Commonly Supplied Food and Drink Guide	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Self-assessment tool for monitoring compliance (found on the Healthy Options website and in Implementation guide)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Healthy Options Information sheets	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Healthy Options tips and resources to promote and sell <b>Green</b> items	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Healthy Options quarterly e-newsletter	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Would you like to be on the e-newsletter mailing list	<input type="checkbox"/> Yes		<input type="checkbox"/> No

**12. Did you use any other tools to implement the Policy?**

- Yes       No       Maybe

Please provide further details:

---



---



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**13. Would you like to suggest any additional resources that could be developed that would assist you to implement the Policy?**

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**14. Would regularly reporting on progress, changes implemented and/or Policy compliance help to improve your compliance with the Policy on your site?**

- Yes       Maybe       No

**If yes or maybe, how often?**

- Monthly       Quarterly       Biannually       Annually

**15. Do the outlets onsite provide catering for onsite functions, meetings or events?**

- Yes       No       Don't know

If yes, does the catering comply with the Policy? I.e.: Offers at least 50% **Green** food and drink options and where practical, offers no more than 20% of food and drinks in the **Red** category

- Always    Sometimes       Rarely       Never       Don't know

If yes, request a copy of the menu if available.

**16. Is catering provided by an outside provider for onsite functions, meetings and events?**

- Yes       No       Don't know

If yes, does the catering comply with the Policy? If yes, does the catering comply with the Policy? i.e.: Offers at least 50% **Green** food and drink options and where practical, offers no more than 20% of food and drinks in the **Red** category

- Always    Sometimes       Rarely       Never       Don't know

**17. Is the site engaged in any fundraising initiatives?**

- Yes       No       Don't know

**If yes, what are they?**

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---

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**If yes and food-based fundraising activities, do they comply with the Policy? i.e.: does not use food or drinks from the **Red** category and prizes donated/sponsored by companies and businesses comprise a minimum of 50% **Green** food and drinks.**

- Always    Sometimes       Rarely       Never       Don't know

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**Note: if section C is completed in consultation with a different person to sections A and B, please ask question 9 (resources) again.**

**5. In general, have changes been made to the café/canteen/kiosk(s) since 2016?**

- Yes
- No
- Don't know

**If yes, have changes been made to:** (select all that apply)

**e) Food and drinks on offer**

- increase **Green** items
  - decrease **Red** items
  - other (please add comments)
- 

**f) Display of food and drinks**

- increase **Green** items on display
  - decrease **Red** items on display
  - other (please add comments)
- 

**g) How food and drinks are promoted**

- increase promotion **Green** items
  - decrease promotion of **Red** items
  - other (please add comments)
- 

**h) Contracts**

- contract revised (e.g. statement about complying with the Policy is included).

Please describe changes:

---

---

6. In general, have changes been made to the vending machine(s) since 2016?

- Yes       No     Don't know

If yes, have changes been made to: (select all that apply)

**e) Food and drinks on offer**

- increase **Green** items       decrease **Red** items  
 other (please add comments)
- 

**f) Display of food and drinks**

- increase **Green** items on display     decrease **Red** items on display  
 other (please add comments)
- 

**g) How food and drinks are promoted**

- increase promotion **Green** items     decrease promotion of **Red** items  
  
 other (please add comments)
- 

**h) Contracts**

- contract revised (e.g. supplier changes; statement about complying with the Policy is included etc.). Please describe changes:
- 
- 

7. In general, have changes been made to the ward trolleys(s) since 2016?

- Yes       No     Don't know

If yes, have changes been made to: (select all that apply)

**d) Food and drinks on offer**

- increase **Green** items       decrease **Red** items  
 other (please add comments)
-

**e) Display of food and drinks**

- increase **Green** items on display     decrease **Red** items on display  
 other (please add comments)
- 

**f) How food and drinks are promoted**

- increase promotion **Green** items     decrease promotion of **Red** items  
 other (please add comments)
- 

**Marketing and promotion**

**8. Have you implemented or trialled any promotional or marketing strategies? (e.g.**

**Red** items taken off display, colour coded menu boards, vending machine shells replaced etc.)

- Yes     No     Don't know

**If yes, please provide examples:**

---





## Appendix 3 – 2018–19 Healthy Options WA Policy audit of compliance sample site report

Western Australian  
School Canteen Association Inc.



*Supporting healthy choices*

XXXX

Executive Director

XXXX Hospital

Street address

Suburb State Postcode

[Email.address@health.wa.gov.au](mailto:Email.address@health.wa.gov.au)

Date

Dear XXXX,

I am writing to thank you for the opportunity to visit XXX Hospital and photograph the food and drinks offered, displayed, and promoted in the café, ward trolley, catering menu and vending machines on X date 2018. I appreciate the time you spent answering questions and providing feedback on your experience in meeting the requirements of the mandatory Healthy Options WA: Food and Nutrition Policy for WA Health Services and Facilities (the Policy).

It was positive to see a large range of Green items available, such as drinks, salads, sushi and rice paper rolls. It is encouraging to hear that you have received positive feedback from customers about the freshness and quality of the food served at the Café.

The accompanying menu assessment spreadsheet contains an itemised list of all food and drinks available on the day of the site visit as well as items listed on menus provided. All items have been colour coded as Green, Amber or Red according to the Policy. Compliance with the Policy requires 50% of products to be classified as Green and less than 20% Red, both on offer and display. Only items classified Green can be promoted by a food outlet or health service facility.



The following pages of this report summarise the percentage of Green, Amber, and Red food and drink items at each outlet along with recommendations to increase compliance. More detailed recommendations can be found in the accompanying menu assessment spreadsheet. Where a specific recommendation has been made, such as replacing an Amber or Red item with an alternative recipe or product, the potential new colour code has also been listed.

✉ PO Box 3484  
East Perth WA 6892

☎ (08) 9264 4999  
✉ [wasca@education.wa.edu.au](mailto:wasca@education.wa.edu.au)

🌐 [waschoolcanteens.org.au](http://waschoolcanteens.org.au)  
📘 [facebook.com/wascainc](https://facebook.com/wascainc)

A copy of the WASCA's most recent StarChoice™ Buyers Guide will be posted to you shortly. This guide contains a list of products classified as Green or Amber and has been referenced in the recommendations of this report. The Policy website, [www.healthyoptions.health.wa.gov.au](http://www.healthyoptions.health.wa.gov.au), also provides additional tools, resources and general information to support implementation of the Policy.

XXXX Hospital has provided extremely valuable information to help inform Policy review. Feedback from all WA Health sites participating in the 2018 compliance audits will be collated and recommendations provided to the Department of Health regarding support to assist in compliance with the Policy in future.

A copy of this report has also been sent to XXXXXX, (Health Promotion Manager) at XXXX Metropolitan Health Service. XXXXXX can be contacted via email at [email.address@health.wa.gov.au](mailto:email.address@health.wa.gov.au) or phone on XXXX XXX XXX.

I am more than happy to discuss the results in further detail with you, should you wish to contact me.

Kind regards,

XXXX  
Project Officer  
Western Australian School Canteen Association Inc.  
(WASCA) [Email.address@education.wa.edu.au](mailto:Email.address@education.wa.edu.au) | XXXX XXXX

All outlets must ensure that they **offer**:

- a minimum of 50% Green food and drinks
- no more than 20% Red food and drinks
- the remainder to be Amber food and drinks.

All outlets must also ensure that they **display**:

- a minimum of 50% Green food and drinks
- no more than 20% Red food and drinks
- the remainder to be Amber food and drinks.

### Definitions

- **Offer** - total range of food and drink options available for sale
- **Display** - is the area that foods and drinks are on view to customers.

Only food and drinks with a Green classification can be **promoted** by a food outlet, health service or facility.

### **Healthy Options WA Policy: Professional and business catering requirements**

All WA health system-funded catering for professional and business events (except staff social functions) must comply with the following requirements:

- Have a wide range of Green food and drinks available, at least 50 % of options offered
- Offer no more than 20% of food and drinks are Red.

Please note that assessment of all meals and items made on site is based on information provided during the interview and assumes use of the following products:

- Reduced fat dairy e.g. cheese and milk
- Lean meats and poultry (e.g. trimmed and skinless)
- Lean or reduced fat burger patties.

**Results – Cafe**

**Offer and display**

The café **is not compliant** with the offer and display requirements of the Policy as the percentage of Red food and drinks on offer and display is greater than 20%.

The following table highlights the proportion of Green, Amber and Red on offer and display at the café:

Outlet	Offered			Displayed		
Café	Green	Amber	Red	Green	Amber	Red
	n=X	n=X	n=X	n=X	N=X	n=X
	X%	X%	X%	X%	X%	X%

**Promotion**

The café **is not compliant** with the promotion requirements of the Policy as the ice-cream fridge displays promotion of Red items e.g. ice-cream fridge

**Recommendations – Café**

Reducing the range of Red items will assist in Policy compliance. For example:

- The range of savoury pastry products (pies, sausage rolls, pasties) are Red and could be replaced with a reduced-fat/salt variety (Amber) e.g.: Mrs Macs Lite 'N Up Range (see the StarChoice™ Buyer's Guide for further product details)
  - It is recommended that the cafe analyses sales data to determine the most popular cakes and muffins (Red) and replace less popular items with Amber varieties. For example
    - Un-iced, uncoated and unfilled cakes containing fruit, vegetables or nuts in 50-60g serves (Amber) e.g.: [carrot cake](#), [banana bread](#), [chocolate brownies](#)
    - Amber muffins in 50-60g serves e.g.: [chocolate muffins](#), [strawberry muffins](#).
- For more recipe suggestions, please visit <https://www.waschoolcanteens.org.au/canteens/menus/recipes/>

Removing the branded ice-cream fridge mentioned above will also assist in Policy compliance.

For more detailed product suggestion, please see the attached menu assessment (Excel spreadsheet).

## Results and recommendations – Ward trolley

The ward trolley is not complaint with the offer and display requirements of the Policy. The following table highlights the proportion of Green, Amber and Red on offer and display on the ward trolley.

Outlet	Offered			Displayed		
	Green	Amber	Red	Green	Amber	Red
Ward trolley	n=X	n=X	N=X	n=X	n=X	N=X
	X%	X%	X%	X%	X%	X%

### **Promotion – Ward trolley**

The ward trolley **is compliant** with the promotion requirements of the Policy as there is no promotion of Red items

### **Recommendations – Ward trolley**

Of the items offered, xxx% are confectionery (n=xx). To increase compliance with the Policy, it is suggested that confectionery lines be reduced to best sellers only and replaced with Green items, such as:

- Whole fresh fruit
- Low-fat yoghurt e.g.: Brownes reduced fat yoghurt, natural and strawberry flavours
- Sandwiches with Green fillings, such as reduced-fat cheese and salad
- Cheese and cracker snacks e.g.:

For additional product suggestions, please see the relevant pages of the Star Choice™ Buyer's Guide.

## Catering menu

### Results – catering menu

The catering menu **is not compliant** with the offer and display requirements of the Policy as the percentage of Red items on **offer** exceeds the maximum permitted of 20%. The following table highlights the proportion of Green, Amber and Red on offer and display on the catering menu:

Outlet	Offered			Displayed		
Catering menu	Green	Amber	Red	Green	Amber	Red
	n=X	n=X	n=X	n=X	n=X	n=X
	X%	X%	X%	X%	X%	X%

### Promotion

The catering menu **is compliant** with the promotion requirements of the Policy as there is no promotion of Red items.

### Recommendations – catering menu

- It is assumed that the cakes and muffins exceed 50-60g per serve, therefore they have been classified as Red. It is recommended that only 50-60g serves of Amber cakes and muffins are offered. For example, [chocolate mini muffins](#), [strawberry mini muffins](#) or [lemon yoghurt muffins](#)
- It is assumed that some dips are classified Amber. It is recommended that only Green dips are offered. For example, [French onion dip](#), [nut free pesto](#) or [hummus](#).

Please note, alcohol listed on the catering menu, has not been colour coded or assessed in the current audit nor it is listed in this report. For more information relating to the responsible service of alcohol and consumption guidelines, please visit:

<https://alcoholthinkagain.com.au/Alcohol-Your-Community/Responsible-Service-of-Alcohol> and [www.alcohol.gov.au](http://www.alcohol.gov.au)

## Results and recommendations – Vending machines

### Results – Vending

#### Offer and display

In total, X vending machines were assessed and X machines **are compliant** with the offer and display requirements of the Policy. X machines are **not compliant** with the Policy as the percentage of Green food and drinks on offer does not meet 50% or the percentage of Red food and drinks on offer exceeds 20%.

Vending machine location	Offered			Displayed		
	Green	Amber	Red	Green	Amber	Red
Machine 1	n=X	n=X	n=X	n=X	n=X	n=X
	X%	X%	X%	X%	X%	X%
	n=X	X%	n=X	n=X	n=X	n=X
Machine 2	X%	X%	X%	X%	X%	X%

*\*Percentages in this table may not add to up 100% due to rounding*

#### Promotion

The vending machines **are compliant** with the promotion requirements of the Policy as there is no promotion of Red items.

### Results – Hot drinks machines

#### Offer and display

In total, X hot drinks machines were assessed and X% of these machines **are compliant** with the offer and display requirements of the Policy. The following table summarises the total number of Green, Amber and Red products on offer and display in these machines:

Vending machine location	Offered			Displayed		
	Green	Amber	Red	Green	Amber	Red
Hot drinks machine 1	n=X	n=X	n=X	n=X	n=X	n=X
	X%	X%	X%	X%	X%	X%
	n=X	n=X	n=X	n=X	n=X	n=X
Hot drinks machine 2	X%	X%	X%	X%	X%	X%

Promotion xxxxx vending **is compliant** with the promotion requirements of the Policy as there is no promotion of Red items

## Appendix 4 – Café, kiosk and canteen compliance by operation and Health Service Provider

**Table 23. Compliance in WA Health operated cafés/kiosks/canteens outlets by health service provider**

Operated by	No. sites surveyed	Nooutlets surveyed	No. outlets meeting compliant with offer requirements	No. outlets compliant with display requirements	No. of outlets promoting Green only	No. outlets compliant with promotion requirements	No. and proportion of outlets meeting all requirements
<b>EMHS</b>	<b>2</b>	<b>6</b>	<b>6</b>	<b>5</b>	<b>5</b>	<b>6</b>	<b>5 (83.3%)</b>
Bentley Hospital	1	1	1	1	0	1	1
Royal Perth Hospital	1	5	5	4	5	5	4
<b>NMHS</b>	<b>3</b>	<b>5</b>	<b>3</b>	<b>3</b>	<b>4</b>	<b>4</b>	<b>2 (40.0%)</b>
King Edward Memorial Hospital	1	1	1	1	0	1	1
Sir Charles Gardner Hospital	1	3	2	2	2	2	1
Graylands Hospital	1	1	0	0	2	1	0
<b>SMHS</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>CAHS</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>WACHS</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>TOTALS</b>	<b>5</b>	<b>11</b>	<b>9 (81.8%)</b>	<b>8 (72.7%)</b>	<b>9 (81.8%)</b>	<b>10 (90.9%)</b>	<b>7 (63.6%)</b>

N/A, not applicable (no outlets)

**Table 24. Compliance in auxiliary (volunteer) operated cafés/kiosks/canteen outlets by Health Service Provider**

Operated by	No. sites surveyed	No. outlets surveyed	No. outlets compliant with offer requirements	No. outlets compliant with display requirements	No. outlets promoting Green Only	No. outlets compliant with promotion requirements	No. and proportion of outlets meeting all requirements
<b>EMHS</b>	<b>3</b>	<b>5</b>	<b>2</b>	<b>2</b>	<b>4</b>	<b>5</b>	<b>2 (40.0%)</b>
Armada Hospital	1	1	0	0	0	0	0
Bentley Hospital	1	2	0	0	2	2	0
Royal Perth Hospital	1	2	2	2	2	2	2
<b>NMHS</b>	<b>3</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>3</b>	<b>0 (0.0%)</b>
King Edward Memorial Hospital	1	2	0	0	0	0	0
Osborne Park Hospital	1	1	0	0	1	1	0
Sir Charles Gardner Hospital	1	2	0	0	2	2	0
<b>SMHS</b>	<b>2</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>3</b>	<b>0 (0.0%)</b>
Fremantle Hospital	1	1	0	0	1	1	0
Rockingham General Hospital	2	2	0	0	2	2	0
<b>CAHS</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>WACHS</b>	<b>5</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0 (0.0%)</b>
Bunbury Hospital	1	1	0	0	0	1	0
Busselton Health Campus	1	1	0	0	0	1	0
Geraldton Hospital	1	1	0	0	0	0	0
Narrogin Hospital	1	1	0	0	0	1	0
Northam Hospital	1	1	0	0	0	0	0
<b>TOTALS</b>	<b>13</b>	<b>18</b>	<b>2 (11.1%)</b>	<b>2 (11.1%)</b>	<b>10 (55.6%)</b>	<b>14 (77.8%)</b>	<b>2 (11.1%)</b>

N/A, not applicable (no outlets)



**Table 25. Compliance in privately-operated outlets by Health Service Provider**

Operated by	No. sites surveyed	No. outlets surveyed	No. outlets compliant with offer requirements	No. outlets compliant with display requirements	No. of outlets with Green Promotion	No. outlets compliant with promotion requirements	No. and proportion of outlets meeting all requirements
<b>EMHS</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>2</b>	<b>1 (50.0%)</b>
Armadale Hospital	1	1	1	1	1	1	1
Royal Perth Hospital	1	1	0	0	1	1	0
<b>NMHS</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>SMHS</b>	<b>1</b>	<b>9</b>	<b>2</b>	<b>0</b>	<b>9</b>	<b>9</b>	<b>0 (0.0%)</b>
Fiona Stanley Hospital	1	9	2	0	9	9	0
<b>CAHS</b>	<b>1</b>	<b>6</b>	<b>4</b>	<b>5</b>	<b>5</b>	<b>5</b>	<b>4 (66.7%)</b>
Perth Children's Hospital	1	6	4	5	5	5	4
<b>WACHS</b>	<b>5</b>	<b>5</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>1 (20.0%)</b>
Albany Hospital	2	2	0	0	0	1	0
Bunbury Hospital	1	1	0	0	0	0	0
Busselton Health Campus	1	1	1	1	0	1	1
Headland Health Campus	1	1	1	0	1	1	0
<b>DOH</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0 (0.0%)</b>
Royal Street Café	1	1	0	0	0	0	0
<b>TOTALS</b>	<b>10</b>	<b>23</b>	<b>9 (39.1%)</b>	<b>7 (30.4%)</b>	<b>17 (73.9%)</b>	<b>19 (82.6%)</b>	<b>6 (26.1%)</b>

N/A, not applicable (no outlets)

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