

Government Response to the Science and Technology Select Committee Report on Behaviour Change

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The Government welcomes the Science and Technology Select Committee's report on *Behaviour Change*, and agrees with the vast majority of its conclusions and recommendations.

While many of these recommendations are specific to particular policy areas or institutions, there are two themes which come through strongly throughout the report, both of which the Government endorses:

- We agree with the Committee's central finding that 'nudges', used in isolation, are likely to be less effective than using a range of interventions. We believe, however, that it is useful and important to consider how to apply behavioural insights as one of several tools which Government has at its disposal.
- We agree that it is of critical importance to ensure that behavioural interventions are properly evaluated, and we are focusing increasingly on this area. The recently published Open Public Services White Paper envisages the establishment of accreditation bodies capable of playing this role, and the work of the Behavioural Insights Team increasingly focuses on the establishment of controlled trials to determine the effectiveness of interventions.

Since the Committee published its report, the *Behavioural Insights Team* has produced an Annual Update to the team's work, which draws together the work that has been completed over the past year. This includes work on health (such as organ donation), consumer affairs (including how consumers can access data which is currently collected by businesses), energy (encouraging the uptake of energy efficiency measures) and a range of other policy areas.

In order to inform the ongoing work of the Committee in this area, we are publishing the Behavioural Insights Team's *Annual Update* alongside the Government's response to the Select Committee's report.

In those policy areas where the Government's responsibilities extend, the policies outlined will apply across the UK. However, other aspects of policy highlighted in the document are devolved, in differing settlements, to the administrations in Scotland, Wales and Northern Ireland. The benefit of devolution is that the Devolved Administrations can tailor their policies and thus deliver public services to meet the specific needs of their countries.

Hol Inquiry Recommendation

8.1. The idea of the Government intervening to change people's behaviour will often be controversial, and so it is important that ministers are always able to explain the evidence-base of any proposed behaviour change intervention, and why it is a necessary and proportionate means of addressing a well-defined problem (paragraph 2.20).

The Government agrees with the Committee's conclusion.

It is important that behavioural interventions draw from the available evidence base, and that the Government is in a position to explain the rationale for policy changes. The Government seeks to take this approach across all policy areas. For example, the recently published *Behaviour Change and Energy Use* paper sets out the evidence base for behavioural interventions in encouraging people to become more energy efficient.

Hol Inquiry Recommendation

8.2. There is a lack of applied research at a population level to support specific interventions to change the behaviour of large groups of people (including a lack of evidence on cost-effectiveness and long-term impact). This is a barrier to the formulation of evidence-based policies to change behaviour. To address this problem, the Government will need to both evaluate their own behaviour change interventions rigorously and establish new evidence by commissioning and funding more applied behavioural research on this scale (paragraph 3.10).

The Government agrees with the Committee's conclusion.

As with all policy decisions, we believe that it is important that the Government is able to evaluate behaviour change interventions rigorously.

In line with the Committee's recommendation, the Government believes that we need to go further in this area. This is why the recently published *Open Public Services* White Paper commits the Government to consult on how to establish credible accreditation bodies for public services. These bodies will mirror the work of the National Institute for Health and Clinical Excellence in the health service and will enable commissioners and providers to know which programmes are proven to work in their policy areas.

Alongside this consultation, the Government is already putting in place new initiatives that will help us to build our evaluation capacity. For example, the Department of Health has invested £5m over five years in the Policy Research Unit on Behaviour and Health, based at the University of Cambridge and directed by Professor Theresa Marteau to help generate evidence on the effectiveness, value for money, and impact on health inequalities of interventions delivered at individual, community and population levels.

Hol Inquiry Recommendation

8.3. We acknowledge that there will be occasions when it is legitimate for a government not to implement behaviour change interventions for which there is good evidence of effectiveness. In these circumstances, however, we believe that ministers have a responsibility to explain why they have decided not to do so (paragraph 4.7).

8.4. We agree with the principle, stated in the Government's *Principles of Scientific Advice*, that ministers should explain publicly their reasons for policy decisions, particularly when a decision is not consistent with scientific advice and, in doing so, should accurately represent the evidence. This places a responsibility on scientists and social scientists within government to ensure that ministers are provided with accurate and up-to-date advice on the available evidence about how to change behaviour so that they can identify where and why they are not basing a policy on the evidence (paragraph 4.8).

The Government agrees with the Committee's conclusion.

As with all policy decisions and in line with the *GCSA Guidelines on the use of scientific and engineering advice in policy making* and the *Government's Principles of Scientific Advice*, departments and policy makers within them should explain publicly the reasons for policy decisions.

Hol Inquiry Recommendation

8.5. We urge ministers to consult their departmental Chief Scientific Advisers about whether the amount of money spent on applied behaviour change research at a population level is sufficient to meet their policy needs (paragraph 4.16).

The Government agrees with the need to ensure that Ministers are able to consult departmental experts when considering the amount of spend on behaviour change research. Chief Scientific Advisors, who already have a remit for advising on research spend, have a critical role to play here, as do Departmental Directors of Analysis and Government Social Research Service Heads of Profession

Hol Inquiry Recommendation

8.6. We recommend that, at the earliest opportunity, the Government appoint a Chief Social Scientist who reports to the Government Chief Scientific Adviser and is an independent expert in social science research to ensure the provision of robust and independent social scientific advice (paragraph 4.23).

8.7. We further recommend that the Government consider whether existing mechanisms for the provision of social scientific advice, in particular advice on behavioural science, are fit for purpose. This should include consideration of

how departmental Chief Scientific Advisers and social scientists within departments can best work together to provide up to date social scientific advice to support evidence-based behaviour change interventions (paragraph 4.24).

It is essential that policy making is informed by high quality evidence drawing upon the full range of analytical disciplines. The Government Chief Scientific Adviser has overall responsibility for ensuring that the government has access to, and uses, high quality, robust science advice and in this capacity he currently helps champion the social sciences in government at senior levels alongside the Heads of the Government Economic and Social Research Services.

As for other areas of evidence, it is essential that social science is effectively represented in policy making. The Government will therefore give careful consideration to the idea of appointing a Chief Social Scientist, which will involve weighing up the potential benefits against any potential costs.

In the meantime the Government agrees that more should be done to join up better the work of Chief Scientific Advisors and Social Scientists within departments on behavioural science. In order to help support ongoing efforts in this area, the Government Chief Scientific Advisor will discuss the current arrangements with the Heads of the Government Social Research and Government Economic Services and will convene a seminar to support join up between Chief Scientific Advisers and other senior members of the Government Analytical Professions around behaviour change interventions. This will be supported by the Behavioural Insights Team.

Hol Inquiry Recommendation

8.8. Departmental Chief Scientific Advisers, whether or not they have experience of the sciences of human behaviour, should be responsible for establishing and maintaining contacts with leading behavioural scientists with expertise relevant to their policy areas and for consulting them as necessary (paragraph 4.30).

8.9. We recommend that the Cabinet Secretary, in consultation with the Government Chief Scientific Adviser and Chief Social Scientist, once appointed, should take steps to ensure that civil servants with responsibility for policy making have the necessary understanding of the importance of changing behaviour and can identify the most appropriate people to consult in their own departments about the development of behaviour change interventions (paragraph 4.32).

The Government agrees that the best expertise and advice from across all the relevant disciplines are brought to bear on decisions in this new area. The multi-disciplinary nature of behaviour science means that Departmental Chief Scientific Advisors and senior analysts should work together to establish and maintain links with leading behavioural scientists. The Behavioural Insights Team, for example, has

established an Academic Advisory Panel, which meets to advise the team on policy and make recommendations as to its future work programme.

The Cabinet Secretary agrees that more can be done to help policy advisors at all levels to understand and apply insights from behavioural science to their work. In order to begin to address this issue, the Behavioural Insights Team, with strong support from Robert Devereux (head of the policy profession and Permanent Secretary of the Department for Work and Pensions), worked with the National School for Government in disseminating the MINDSPACE framework for applying behavioural economics to public policy making. These sessions were attended by around 400 Senior Civil Servants from across Whitehall. Other sessions were targeted at more junior staff.

Hol Inquiry Recommendation

8.10. We recommend that the Cabinet Office, in consultation with the Chief Social Scientist, once appointed, consider how to consolidate the available guidance in a form which is evidence-based and accessible to policy makers (paragraph 4.35).

8.11. We further recommend that the National Institute for Clinical Excellence updates its 2007 Behaviour Change Guidance and considers whether accessible, multi-disciplinary guidance could be provided in relation to health-related behaviour change policies, particularly to offer more explicit advice on how behaviour change techniques could be applied to reduce obesity, alcohol abuse and smoking (paragraph 4.36).

The Cabinet Office has already published a paper, jointly with the Institute for Government, which sets out an evidence-based framework for applying behavioural insights to public policy making. The framework is called MINDSPACE (a mnemonic that sets out nine of the most robust behavioural effects) which has a strong focus on how policy makers can apply behavioural insights in practice.

NICE periodically reviews its published guidance to determine whether it should be updated to reflect any significant new evidence or other developments. The Department of Health understands that NICE plans to review its guidance on behaviour change later this year so that the Committee's findings can be taken into account. NICE will consult stakeholders as part of the review process. NICE guidance on obesity, alcohol abuse and smoking also encompasses behaviour change interventions where relevant.

Hol Inquiry Recommendation

8.12. We recommend that the Cabinet Office, together with the Government Chief Scientific Adviser and Chief Social Scientist, once appointed, review the current mechanisms for sharing knowledge about behaviour change among government departments with a view to introducing a more streamlined structure (paragraph

4.41).

8.13. We recommend further that this revised structure should involve the continuation of work begun on the “inventory of behaviours” in order to establish an archive of behaviour change interventions. This archive should provide accounts of the evaluation of the interventions and include unsuccessful as well as successful interventions (paragraph 4.42).

We agree that it is important to ensure that effective mechanisms exist for sharing and disseminating knowledge about behavioural interventions.

In order to help facilitate this process, the Behavioural Science in Government Network was formed. Its work is now being taken forward by a cross-government working group, led by the Government Economic and Social Research Services and with representatives from many government departments including the Behavioural Insights Team.

Its role is to identify best practice in behaviour science, to promote effective evaluation of interventions, and to share reports, events and information. This includes recording and learning the lessons from unsuccessful as well as successful interventions.

Hol Inquiry Recommendation

8.14. In general, the evidence supports the conclusion that non-regulatory or regulatory measures used in isolation are often not likely to be effective and that usually the most effective means of changing behaviour at a population level is to use a range of policy tools, both regulatory and non-regulatory. Given that many factors may influence behaviour, this conclusion is perhaps unsurprising (paragraph 5.13).

8.15. We welcome efforts by the Government to raise awareness within departments of the importance of understanding behaviour, and the potential this has for the development of more effective and efficient policies. We are concerned, however, that emphasising non-regulatory interventions will lead to policy decisions where the evidence for the effectiveness of other interventions in changing behaviour has not been considered. This would jeopardise the development of evidence-based, effective and cost-effective policies (paragraph 5.14).

8.16. We therefore urge ministers to ensure that policy makers are made aware of the evidence that non-regulatory measures are often not likely to be effective if used in isolation and that evidence regarding the whole range of policy interventions should be considered before they commit to using non-regulatory measures alone (paragraph 5.15).

The Government agrees with the conclusion that a range of policy tools will often need to be used in order to achieve the desired policy outcome. However, the Government believes that it is important to recognise the role that behavioural

insights plays as an additional policy tool which policy makers have at their disposal.

Put another way, there are few circumstances in which the Government would argue that 'nudging' alone is likely to be sufficient. For example, when we consider an area such as smoking or alcohol consumption, we would contend that it is useful and right to have a regulatory regime in place which ensures that individuals under a certain age cannot routinely purchase these products. In these areas taxation is also used to encourage people to reduce their consumption patterns.

But in addition to these levers, we have rightly been thinking about how we can encourage people to lead healthier lives through the application of behavioural insights and other non-regulatory instruments. It is not a question, therefore, of the use of regulation being ruled out altogether, rather that regulation is only used when satisfactory outcomes cannot be achieved by alternative approaches, or where alternative approaches would involve much higher costs.

As the Committee's report recognises, it is important that this approach draws upon the available evidence base and that interventions are rigorously evaluated.

Hol Inquiry Recommendation

8.17. The involvement of other organisations to support the Government's behaviour change initiatives may provide valuable opportunities to improve the effectiveness of behaviour change interventions, in particular by allowing a range of messengers to be used to deliver them. We welcome the Government's intention to use such collaborations (paragraph 5.25).

8.18. However, we have major doubts about the effectiveness of voluntary agreements with commercial organisations, in particular where there are potential conflicts of interest. Where voluntary agreements are made, we recommend that the following principles should be applied in order to ensure that they achieve their purpose:

- The Government should specify clearly what they want businesses to do based on the evidence about how to change behaviour, and what steps they will take to achieve the same result if voluntary agreements are not forthcoming, or prove ineffective.
- Voluntary agreements should be rigorously and independently evaluated against measurable and time-limited outcomes (paragraph 5.26).

8.19. Given that these principles do not appear to have been applied consistently to the Public Health Responsibility Deal Network, we urge the Department of Health, in particular, to ensure that these principles are followed when negotiating further voluntary agreements. In relation to the current agreements, we recommend that the Department of Health should state for each pledge what outcomes are expected and when, and provide details of what steps they will take if the agreements are not effective at the end of the stated period (paragraph 5.27).

As the Committee has acknowledged, collaboration between Government, public

health, commercial and voluntary organisations presents a unique opportunity for all parts of society to play a role in improving the public's health.

While the Government is of course alive to the fact that conflicts of interest may arise in establishing voluntary agreements with commercial organisations, we also believe that it is important to recognise the positive role that such organisations might play in influencing individuals to live healthier lives. This again points to the need to take a balanced approach to policy, drawing upon those levers which help to deliver positive policy outcomes. And to the need to ensure that voluntary agreements are informed by the available evidence.

In relation specifically to the public health Responsibility Deal, it is important to recognise that the pledges are not intended to replace action by Government, but to complement them. And that many of these pledges will allow us to move more quickly than we might have otherwise been able to address issues which the evidence base suggest need to be tackled.

One example of this approach is how the Responsibility Deal will help people to reduce their salt intake. There is strong evidence on the relationship between high levels of salt intake and increased risk of high blood pressure which, in turn, significantly increases the chances of having heart disease or a stroke. The Scientific Advisory Committee on Nutrition recommended that the average salt intake of the population should be reduced to 6g per day. Meeting the Responsibility Deal salt targets will remove approximately 30% of the total salt that needs to be removed for population intakes to fall to 6g per day.

In some areas, the Government recognises that the evidence base is not as developed as it is in relation to salt intake. But we do not believe that this means that no action should be taken. There are several pledges which we feel have real potential to benefit public health including:

- Heineken's pledge to reduce the alcohol strength of one of its major brands
- ASDA's pledge not to display alcohol in the foyer of its stores
- A pledge to make staff restaurants healthier, which over 80 organisations have signed up to
- A pledge to embed the principles of the new developed chronic conditions in organisation's HR procedures, which again over 80 organisations have signed up to

Partners' pledge delivery plans, and the full list of quantitative measures that they will report against, will be published on the Department of Health's website later this year. Annual updates from the first year of the Responsibility Deal will be available on the Department's website in the Spring. Meanwhile, the R&D Directorate of the Department of Health has commissioned a research team to support the evaluation of the programme.

It is important to recognise that the responsibility deal is a new programme, one which we intend to strengthen and build on over the coming year.

Hol Inquiry Recommendation

8.20. Although decentralising responsibility may provide a useful opportunity to tailor local behaviour change initiatives and to help build the evidence-base for applied behaviour change research at the population level, steps should be taken to ensure that interventions are evidence-based and properly evaluated. To this end, we recommend that the Government:

- produce guidance for local authorities on how to use evidence effectively to design, commission and evaluate interventions and on the need to involve experts in the design and evaluation process, and provide advice on how to best use the tendering process to ensure value for money;
- take steps to ensure that evaluation of interventions, including data collection and reporting of behaviour change outcomes, across local areas is of sufficiently high quality to allow comparisons and analysis;
- takes steps to ensure that what is learnt by a local government in one place can be readily transmitted to other local governments; and
- provide funding only for those schemes which are based on sound evidence.

Demonstration of rigorous evaluation and contribution to the evidence-base should be a requirement for future funding for behaviour change interventions (paragraph 5.30).

The Government agrees that it is important for local authorities to have the ability to tailor their interventions to local populations. As such, the Government believes that it is right that local authorities are able to take decisions themselves in relation to funding and data collection without the need for Central Government intervention.

However, as stated above, the Government does believe that it is important to ensure that local commissioners and providers – including within local authorities – have access to better information about what works. This is why the recently published *Open Public Services White Paper* commits the Government to consult on how to establish credible accreditation bodies for public services.

Hol Inquiry Recommendation

8.21. Effective evaluation requires that:

- evaluation should be considered at the beginning of the policy design process. External evaluation expertise should be sought, where necessary, from the policy's inception;
- relevant outcome measures—as distinct from outputs—should be established at the beginning of the policy development process;
- the duration of the evaluation process should be sufficiently long-term to demonstrate that an intervention has resulted in maintained behaviour change;
- pilot studies, using population-representative samples, followed by controlled

trials assessing objective outcomes should be used whenever practicable; and

- sufficient funds should be allocated for evaluation, recognising that establishing what works, and why, is likely to result in better value for money in the long-term (paragraph 6.14).

8.22. We find however that, at present, evaluations of Government behaviour change interventions often lack one or more of these necessary elements. While we welcome the Government's revision of the Magenta Book, the evaluation guidance for policy makers and analysts, we believe that it could be further improved. We recommend that the Government consult external evaluation experts on the creation of a concise document for policy makers, containing only the most important principles of evaluation. We further recommend that they make clear what steps they will take to ensure that the revised guidance leads to a change in evaluation culture across Whitehall (paragraph 6.15).

The Government agrees with the Committee's focus on the need for effective evaluation. The Committee's recommendation will feed into the work of the Cross Government Evaluation Group, which is overseeing the implementation and promotion of the revised version of the Magenta Book, and is also developing further supporting supplementary guidance. A short summary document of the Magenta Book is already available, and will also be updated to address the needs of policy makers for concise information on the principles of evaluation.

The Government agrees with the Committee in emphasising the importance of controlled trials, wherever practicable. The recent work of the Behavioural Insights Team draws heavily upon this approach, for example through the introduction of trials aimed at testing different ways of encouraging people to introduce energy efficiency measures in their homes (see the joint Cabinet Office, Department for Energy and Climate Change and Department for Communities and Local Government report on *Behaviour Change and Energy Use*).

Hol Inquiry Recommendation

8.23. It appears that the Change4Life programme has, on the whole, been evidence-based and appropriately targeted. We note the Government's commitment to continue using the brand and urge the Department of Health to ensure that future evaluations are robust and establish whether or not the programme is likely to be successful in the longer term (paragraph 7.12).

The Government agrees with the Committee's recommendation. However, we would emphasise that Change4Life presents a number of challenges for evaluation. As the Committee noted, Change4Life is only the *marketing component* of the Government's response to obesity: it has been designed to work with other policy levers. As such, it can be virtually impossible to isolate the effects of Change4Life from other interventions and actions that may be operating at a national or local level. It is the combination of these levers that we believe is likely to be effective on

individuals and the population, not any in isolation.

It will take several years for the impact of any actions to tackle obesity to be seen in population level BMI statistics, and several decades for these changes to filter through into reductions in prevalence of obesity-related illnesses (since many of the policy levers are designed to influence the behaviours of children, and these illnesses typically develop in mid-life).

So, while we have always been cognisant of the need to establish the longer term efficacy of the programme, we have had to put in place interim measures to see whether the campaign is inspiring change. While these indicators do include output measures, such as brand awareness, these are there primarily to ensure that public money is being spent efficiently (i.e. that the messages are reaching the target audiences cost-effectively).

More important, however, are measures of behaviour change. These fall into two categories: claimed behaviour change and actual behaviour change. Claimed behaviour change is much easier to track, and we have historically monitored it via a continuously collected, and nationally representative, tracking study of parents and other adults, fielded for us by the independent market research company, TNS/BMRB. This has shown encouraging signs that some of their behaviours and attitudes are changing. However, we are aware that a marketing campaign like Change4Life might increase the social desirability of certain behaviours (such that people claim to do them when they do not). For this reason, we instigated a pilot project to analyse the actual purchases made over a three-month period of 10,000 families who had engaged with the Change4Life programme vs. a demographically comparable control sample of 10,000 families who had not. The pilot found some statistically significant differences in the purchasing behaviours of the Change4Life families, for example they were buying more diet beverages and low fat milk.

However, we accept that we need to do more and are always seeking ways to improve the effectiveness of our evaluations. Going forwards, we will also explore the feasibility of building into our evaluations commercially available purchasing and consumption data.

Hol Inquiry Recommendation

8.24. We invite the Government to explain why their policy on food labelling and marketing of unhealthy products to children is not in accordance with the available evidence about changing behaviour. Given the evidence, we recommend that the Government take steps to implement a traffic light system of nutritional labelling on all food packaging. We further recommend that the Government reconsider current regulation of advertising and marketing of food products to children, taking a more realistic view of the range of programmes that children watch (paragraph 7.17).

Food labelling is an area of EU competence and the new EU Food Information Regulation (FIR), which will be agreed before the end of the year, will strengthen legislation on food labelling, in particular nutrition labelling. The Government wants

to see a more consistent approach to front of pack nutrition labelling in the UK marketplace, with the ability to provide percentage guideline daily amount (GDA) for energy, fat, saturates, sugars and salt, together with the option of providing additional traffic light colour coding.

In addition to requiring mandatory nutrition information on back of pack for most pre-packed foods, the Regulation also allows for the provision of voluntary front of pack nutrition information. While the Regulation is not yet agreed, it is likely to provide the ability to make use of additional forms of expression in the provision of front of pack information (such as traffic light colour coding), subject to satisfying a number of conditions. The Regulation also provides Member States with the ability to recommend one or more additional forms of expression or presentation that best fulfil the requirements set out in the Regulation. However, business will not be compelled to make use of the recommendation(s).

Through a system of self and co-regulation there are already strict controls in place in relation to the advertising of high fat, sugar, salt (HFSS) foods to children. These include scheduling restrictions on the television advertising of HFSS foods during children's programmes and programmes of particular appeal to children up to the age of 16. In addition, both the broadcast and non-broadcast advertising codes include restrictions on the techniques that can be used in promoting food and drink products, including HFSS products. These rules include a prohibition on the use of licensed characters, celebrities, promotional offers and health claims in ads. for HFSS products targeted at children up to primary school age.

Furthermore, UK regulations also prohibit the product placement of HFSS foods in UK-made programmes, largely matching the current advertising restrictions.

The Public Health Responsibility Deal Food Network has had a preliminary discussion on promotion and marketing of food to children and agreed to return to this issue in phase 3 of its work programme in 2012/13.

Hol Inquiry Recommendation

8.25. We draw attention to our recommendation about the failures of all current pledges made by the Public Health Responsibility Deal (see paragraph 8.19). Moreover, obesity is a significant and urgent societal problem and the current Public Health Responsibility Deal pledge on obesity is not a proportionate response to the scale of the problem. If the Government intend to continue to use agreements with businesses as a way of changing the population's behaviour, we urge them to ensure that these are based on the best available evidence about the most effective measures to tackle obesity at a population level. In particular, they should consider the ways in which businesses themselves influence the behaviour of the population in unhealthy ways. If effective measures cannot be achieved through agreement, the Government must pursue them through other means (paragraph 7.20).

The Government does not agree with the Committee's view of the current Responsibility Deal pledges. We believe that our initial set of pledges are a good

start to a long-term programme of work.

The Government agrees that obesity is a significant and urgent problem, and will shortly be publishing a follow-up document to *Healthy Lives, Healthy People*, on obesity. It is neither the Government's understanding, nor that of the Responsibility Deal members, that the Responsibility Deal is itself a sufficient response to obesity; it is one part of the response.

Pledges developed to date through the Public Health Responsibility Deal Food Network are helping to support better nutrition through out of home calorie labelling, salt reduction, and removal of artificial trans fats.

Hol Inquiry Recommendation

Weight management interventions

8.26. We recommend that the Department of Health should commission a review of the provision of weight management services, including the Health Trainers programme, across the country. We recommend further that the National Institute for Clinical Excellence should compile a list of approved weight management services which adhere to their best practice guidance. If the Health Trainers programme is included in this list, we recommend that the Government should continue the programme, particularly in the light of its focus on tackling health inequalities (paragraph 7.25).

To help local areas successfully tackle the challenge of obesity, within the context of their local population needs, the Department of Health has commissioned the National Institute for Health and Clinical Excellence (NICE) to produce guidance on *working through local communities to prevent obesity*. The scope of this guidance focuses on how local areas can use different approaches to tackle obesity.

To support and encourage improvement in the provision of weight management services the Department of Health has also referred two further obesity topics to NICE. The scope of these topics is to provide focused recommendations on best practice approaches to managing overweight and obesity in non-clinical settings, for adults, and for children.

These forthcoming pieces of guidance on preventing and managing overweight and obesity are underpinned and complemented by a Health Technology Assessment on the effectiveness, and cost effectiveness, of weight management services.¹ Furthermore, NICE clinical obesity guidance² provides recommendations to commissioners, providers and health care professionals on the effectiveness and cost effectiveness of non-clinical, medical and surgical approaches to the management of overweight and obesity in both children and adults.

¹ Loveman E et al.(2011) The clinical effectiveness and cost-effectiveness of long-term weight management schemes for adults: a systematic review. *Health Technology Assessment*. 15(2)

² National Institute for Health and Clinical Excellence (2006) *Obesity guidance on the prevention, identification, assessment and management of overweight and obesity in adults and children*. <http://guidance.nice.org.uk/CG43/Guidance>

In addition to NICE guidance, weight management service providers and commissioners have been encouraged to adopt a standardised evaluation approach to their services. The National Obesity Observatory (NOO) has developed a Standard Evaluation Framework³ and continues to support both providers and commissioners to use the framework to evaluate the effectiveness of weight management services.

The Department of Health has also supported improvements in the commissioning of child weight management services with the publication of a *Child weight management programme and training providers framework*.⁴ This framework was designed to support local commissioners in procuring weight management services suitable for children and young people. The framework is valid until 2012 and includes nine provider organisations that have undergone a national-level procurement and quality assurance process run by the Department of Health.

The Department of Health's Policy Research Programme has commissioned an evaluation of the Health Trainer initiative. The project looks at the diverse ways in which the role has been interpreted and the types of advice given. Implementation is context-specific and it will be difficult to isolate and generalise about health impact within this or any subsequent research.

Hol Inquiry Recommendation

8.27. We recommend that the DfT should prioritise funding to research the most effective behaviour change interventions to reduce car use for medium and longer-length journeys and undertake pilots of those interventions as soon as possible.

The Government is certainly anti-carbon, but it is not anti-car. We are therefore pursuing a strategy of decarbonising road transport. In the short term, the most significant CO₂ savings will come from improvements to the fuel efficiency of conventional vehicles. In the longer term ultra low emission vehicles are likely to play a greater role and that is why we have confirmed a £400m programme to support the uptake of these vehicles.

We do, however, recognise that modal shift from road and air to rail for medium and longer-length journeys can also generate useful environmental and congestion benefits. The Government has a clear role to play in facilitating choices and encouraging behaviour change, including by promoting the use of ICT and flexible working to reduce or remove the need for work-related travel.

We welcome the report's recognition of the importance of research and will seek to build on existing evidence on the factors that influence trip and mode choice. Very recently, for example, the Department for Transport published a major segmentation

3 National Obesity Observatory (2009) *Standard Evaluation Framework for weight management interventions*.

http://www.noo.org.uk/uploads/doc/vid_3534_NOOSEReportJuly09.pdf

4 Department of Health (2009) *Child weight management programme and training providers framework*.

http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/DH_097297

study, which quantified the barriers and motivators for changing transport behaviour in relation to the journey to work; and demonstrates how the many factors which determine transport behaviour interact to form distinct segments with the adult population.⁵

We will also build on existing evidence through evaluation of interventions funded through the Local Sustainable Transport Fund (LSTF). An evaluation framework is currently being developed for the Fund in partnership with local authorities. The framework will aim to assess the contribution of the Fund in generating economic growth in a low carbon way, and could explore the effectiveness of measures aimed at medium and longer-length journeys as part of this work, if this is an objective of interventions being delivered by local authorities.

Hol Inquiry Recommendation

8.28. Bearing in mind our concern (see paragraph 5.14 above) that the Government's preference for non-regulatory interventions may lead officials to give insufficient consideration to regulatory and fiscal interventions, we urge the DfT to ensure that evidence for both non-regulatory and regulatory measures is taken into account when formulating policies to reduce car use.

8.29. As the evidence suggests that good infrastructure is a prerequisite for, and greatly enhances, the effectiveness of other "smarter choices" measures, we strongly encourage the DfT to ensure that, wherever possible in a time of financial stringency, a sufficient proportion of funds is maintained to make effective improvements and changes to infrastructure.

As stated above, it is not a question of the use of regulation being ruled out altogether, rather that regulation is only used when satisfactory outcomes cannot be achieved by alternative approaches, or where alternative approaches would involve higher costs.

The Government recognises the importance of sustainable investment in transport infrastructure. In the 2010 Spending Review DfT received significant funding for capital investment. This includes a substantial electrification programme of the rail network, go-ahead for Crossrail and Thameslink, and the purchase of over 2,000 new rail vehicles.

The Government is also committed to funding high value local capital transport projects that Local Authorities cannot wholly fund through their own resources. We have made provision to spend over £1.5 billion on major local authority transport schemes (those costing over £5 million) in the period from 2011/12 to 2014/15. In addition, the Local Sustainable Transport Fund will provide capital as well as revenue funding (£210 million capital, £350 million revenue) in order to allow local areas to improve or enhance transport infrastructure in their area as part of a package of measures.

⁵ <http://www.dft.gov.uk/publications/climate-change-transport-choices-segmentation>

Hol Inquiry Recommendation

8.30 Whilst we welcome the DfT's emphasis on the use of policy packages, we note they do not include regulatory and fiscal measures and so do not wholly reflect the evidence about how to change transport mode choice. This suggests that their effectiveness and, in turn, their cost-effectiveness could well be limited.

Local policy packages, such as those funded through the Local Sustainable Transport Fund, are not intended to work in isolation. They operate within the framework of national regulatory and fiscal policies. These include national measures, for example graduated Vehicle Excise Duty (VED) and Company Car Tax, which contribute to the sustainability of the public finances and also incentivise the purchase of fuel efficient cars. The Plug-In Car Grant, which commenced in January 2011, will also help both private consumers and businesses in the UK to purchase an electric, plug-in, hybrid or hydrogen fuelled car. At a local level packages can also include measures to manage the cost and availability of car parking.

Hol Inquiry Recommendation

8.31 Although we welcome the principle of DfT's Local Sustainable Transport Fund, the initiative is based on a pilot project which was incompletely evaluated and so did not provide evidence about the long-term effectiveness of interventions. Furthermore, as we have noted in paragraph 7.41, the Sustainable Travel Towns pilot did not wholly reflect the evidence about how to change transport mode choice.

In launching the Local Sustainable Transport Fund (LSTF), the Department for Transport drew on a range of evidence sources, including the evaluations of the 6 Cycling Demonstration Towns (2005-11) and the 12 Cycling City and Towns (2008-11). Through the Department for Transport's ongoing engagement with the evaluation work and emerging findings, evidence from the pilots informed the design of the new initiative. Some of this evidence about the effectiveness of investing in sustainable transport is set out in the White Paper on sustainable local transport.⁶

But the LSTF is not simply a "successor" to the Sustainable Travel Towns pilot project. The objectives differ, and the devolved nature of the Fund empowers local authorities to develop solutions to the specific challenges they face in order to enable

⁶ 'Creating Growth, Cutting Carbon: Making Sustainable Local Transport Happen' (DfT, January 2011).

green growth. The LSTF was established to provide people with options to choose low carbon modes for everyday local transport choices which can help boost economic growth by facilitating access to local jobs.

The Department for Transport will consider the House of Lords recommendations on evaluating behaviour change when designing the LSTF evaluation framework. All findings from the Cycling Demonstration Towns and Cycling City and Towns evaluations will also be shared with local authorities receiving funding through the LSTF in the near future, once evaluation reports are published.

Hol Inquiry Recommendation

8.32 We commend DfT's recognition that, if responsibility for interventions is to be devolved to local agents, guidance to commissioners on the evidence and an evaluation framework are necessary. We note, however, that current guidance does not take into account the evidence about the need for strong disincentives to car use needed to achieve significant changes in behaviour and fails to provide any analysis of the evidence associated with effective interventions.

The Department for Transport drew local authorities' attention to a wide range of research and evaluation evidence when the Local Sustainable Transport Fund was launched in January 2011. In addition to the guidance the committee refer to in their report, all local authorities bidding to the Fund were encouraged to make use of a resource library⁷ which contained numerous resources to inform the development of their sustainable transport plans, without being prescriptive about what interventions these should include.

The LSTF gives local authorities the freedom to develop interventions to address the particular transport challenges and characteristics of their residents, which will inevitably vary between different areas. The bids submitted to date have demonstrated that a large number of local authorities have made extensive use of this resource library already, which will also be promoted to all local authorities bidding to tranche 2.

We plan to work collaboratively in designing and implementing the LSTF evaluation, which in turn will address the lack of skills and resources in local authorities to research and interpret evidence. We will consider the House of Lords recommendations about the steps which need to be taken to ensure that interventions delivered locally are evidence-based and properly evaluated.

Hol Inquiry Recommendation

Promoting and enabling choice: the role of regulation and infrastructure

⁷ <http://assets.dft.gov.uk/publications/adobepdf-165237/lstfresourcelibrary.pdf>

8.32 We recommend that the Government (a) establish and publish targets for a reduction in carbon emissions as a result of a reduction in car use; (b) publish an estimate of the percentage reduction in emissions which will be achieved through reducing car use and the timescale for its achievement; and (c) set out details of the steps they will take if this percentage reduction is not achieved by this time.

The Government does not believe that it is appropriate to set specific targets for reducing carbon emissions by reducing car use. The Government has set carbon reduction targets for the economy as a whole which defines the overall levels of reduction to be achieved, while leaving flexibility to meet the targets in the most cost-effective way.

We are committed to ensuring that the transport sector does play its part in delivering emissions reductions to meet the overall targets, but our approach is to target the carbon – not the car. Rather than trying to force people out of their cars, we aim to promote choice by making travelling on foot, by bike or on public transport more attractive, for example through our Local Sustainable Transport Fund. We have also introduced a wide range of other policies to reduce road transport emissions, such as encouraging the purchase of cleaner, greener cars, promoting fuel efficient driving and providing support for the development of low-carbon technologies.

We are also committed to the EU regulations on new car and van fuel efficiency, which have introduced mandatory targets for manufacturers to reduce emissions from these vehicles. Our response under recommendation 8.30 identifies how fiscal measures are also helping to incentivise the purchase of fuel efficient vehicles in the UK. Over the next decade, we expect these targets to help to deliver the most significant greenhouse gas savings from transport.