

Baby Feeding Law Group and Breastfeeding Manifesto Coalition response to Department of Health Questions regarding commercial involvement in *Start 4 Life*

October 2010

- 1) What would your criteria be for supporting the inclusion of an organisation as a Start4Life partner? (At the meeting, some people felt that this question would best be answered by forwarding a copy of their ethical policy.)**

In line with the Government's obligations under the Global Strategy for Infant and Young Child Feeding to provide objective, evidence-based information and support to parents, the Breastfeeding Manifesto Coalition (BMC) and Baby Feeding Law Group (BFLG) support the principle, previously acknowledged and agreed with the Department of Health (DH) and Start4Life (S4L), that information for parents of infants and young children should be independent and free from commercial influence and publicly funded.

If the DH has to take on private sector partners for S4L, BMC and BFLG would find it unacceptable if any organisation chosen did not conform with the ethical policy of the Breastfeeding Manifesto Coalition, which is an Appendix to this response and includes the following two paragraphs:

“Partnerships with companies involved in the manufacture, and/or distribution of any of the following must be avoided:

- *Breastmilk substitutes or food designed for babies under 6 months. This includes any food stuff or liquid designed for babies under the age of 6 months.*
- *All formula and follow-on formula milk*
- *All food and drinks designed for babies and young children*
- *Baby feeding equipment. Most items of infant feeding equipment are covered by the WHO Code specifically bottles, teats, dummies and breast pumps.¹*
- *Tobacco manufacturers*
- *Nestle (including all known subsidiaries) products. The BMC supports the Nestle Boycott.*

In addition any company which:

- *procures personal data from parents and provides this on to third parties, not in keeping with our ethical policy*
- *promotes the telephone “carelines” of breastmilk substitute manufacturers in any of their activities.”*

In addition to the BMC ethical policy the BMC and BFLG would exclude any company manufacturing food and drinks, arms, alcohol, or pharmaceuticals (including medical foods.)

¹ **Organizations, which have a commercial interest in marketing infant and young child feeding products, are not neutral. Women who decide to breastfeed do so in an environment full of influences which work against that decision – influences which are primarily generated by commercial companies whose marketing and promotional budgets are many times that available for the promotion and support of breastfeeding. We believe that companies show interest in S4L and are keen to have their names associated with advice lines and education programmes in order to positively influence public perceptions of the company and so increase market share.**

2) List of any specific companies that you would suggest that Start4Life work with?

The S4L initiative is seeking to promote healthy decision-making, rather than the promotion of products for infants and young children. Therefore manufacturers and distributors of products for infants and young children are inappropriate.

If the DH has to use private sponsors, BMC and BFLG would prefer Trusts and Foundations that are not owned or in partnership with any of the companies excluded in question 1. Companies that operate in areas such as leisure, telecommunications and financial services could also be considered provided that, such partnerships with commercial companies are thoroughly checked for bad practices and social implications of their actions. There needs to be prior agreement on what type of benchmarking or criteria will be used to assess these companies and who will undertake robust social audit and ongoing monitoring of the company concerned.²

We would expect organisations working with S4L to ensure that all their messages are in line with S4L and do not conflict with DH public health messages or the standards of BMC. We feel there are ample companies who will meet these criteria and will want to make the most of this opportunity.

3) List of “deal breakers” –

a) What companies

b) Situations

Would be completely unacceptable to you as Start4Life partners?

a) Any companies referred to in our answer to Question1 are “deal breakers”

b) The organisations concerned require that the use and positioning of their names and/or logos be first cleared with them.

4 A possible way forward, that has been suggested since the meeting, would be to use this opportunity to develop the Breastfeeding Manifesto Coalition Breastfeeding Welcome scheme in line with the work done on the Breastfeeding Welcome Children’s Centres Pilot (currently on hold). This would involve a wide range of companies signing up to being welcoming to breastfeeding mothers coming into the shop / premises and also to supporting their own employees returning to work so that they can continue to breastfeed.

We would appreciate the opportunity to consult further with our members on this important question and then meet with you to discuss the best routes forward.

² Examples of such audits and screening criteria used by WHO, UNICEF and others can be provided.

The Breastfeeding Manifesto Coalition Ethical Sponsorship Policyⁱ

July 2008

1. Information and Introduction

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In line with best practice, the Breastfeeding Manifesto Coalition will highlight the ethical policies and any commercial partnerships in their Annual Report and yearly accounts.

This ethical policy will also be highlighted to any possible commercial partner.

The Breastfeeding Manifesto Coalition will use the criteria in this ethical policy when considering whether a proposed commercial partnership is appropriate and in the best interests of the Coalition.

Our Guiding Principles

We look forward to a society where:

- Women feel enabled to initiate and continue breastfeeding for as long as they wish
- Parents are supported to make informed choices about feeding their babies
- Everyone is aware of the significant benefits associated with breastfeeding

Aims

The Coalition aims to ensure that all seven objectives of the Manifesto are achieved.

2. Commitment to Address Ethical Issues

As a large Coalition we believe that working together collaboratively will fulfil the aims of the Manifesto and that of independent Coalition Member organisations. Therefore, it is vital that we maintain our independence and do not allow external partnerships to bring the name of the

Breastfeeding Manifesto Coalition into disrepute. Neither do we want to bring the name of individual Coalition organisations into disrepute.

The Breastfeeding Manifesto Coalition therefore seeks, so far as is practical and within the constraints of UK law;

- initiatives that do not compromise the independent status of the Breastfeeding Manifesto Coalition
- to ensure that the activities we engage in are consistent with the values of our Coalition members

This policy has been devised to ensure clarity and openness to all our stakeholders. It is designed to address sponsorship; cause related marketing, donations, gifts in kind and advertising. We welcome comments, criticism and suggestions as to how these goals can be met at any point throughout the financial year.

Stakeholders include the Coalition organisations and all individuals signed up to the Manifesto.

3. WHO Code and Subsequent Resolutions

The Breastfeeding Manifesto Coalition fully supports the code and this ethical policy will be in line with that code. The BMC will also seek to educate and encourage the companies it comes into contact with to operate in line with this code.

4. Excluded From Sponsorship

Partnerships with companies involved in the manufacture and distribution of any of the following activities must be avoided:

- Breastmilk substitutes or food designed for babies under 6 months. This includes any food stuff or liquid designed for babies under the age of 6 months.
- All formula and follow-on formula milk
- All food stuffs designed for babies and young children
- Baby Feeding Equipment. Most items of infant feeding equipment are covered by the WHO Code specifically bottles, teats, dummies and breast pumps
- Tobacco manufactures
- Nestle (Including all known subsidiaries) products. The BMC supports the Nestle Boycott.

In addition we would exclude:

- Any company which procures personal data from parents and provides this on to third parties, not in keeping with our ethical policy
- Any company which promotes the telephone “carelines” of breastmilk substitute manufacturers in any of their activities.

Companies, funding or gifts in kind must not breach the WHO International code and relevant resolutions or the Global Strategy for Infant and young child feeding.

All Breastfeeding Manifesto Coalition Members should declare any financial or other interests in relevant organisations providing such goods or services. This will be possible in the Competing Interests Form.

The secretariat must research any company before entering into any agreement to ensure they meet the above criteria. A process for research is outlined below.

5. Product Endorsements

The Breastfeeding Manifesto Coalition does not endorse or approve products or companies, and a statement to this effect will be included alongside any branding or promotion associated with products.

6. Engagement

The Breastfeeding Manifesto Coalition believes that benefits to both partners can be enhanced if the charity partner has an input into policy issues at the commercial organisation. To this end, for substantial partnerships of more than 12 months duration, The Breastfeeding Manifesto Coalition will seek to establish a formal process for consultation.

7. Process/Implementation

To maintain the reputation of the Breastfeeding Manifesto Coalition and to ensure the implementation of its objectives the Breastfeeding Manifesto Coalition exclude partnerships, funding or sponsorship from companies whose activities:

- conflict with the mission statement
- could harm the BMC- directly or indirectly
- might damage the public's perception of the BMC

The Breastfeeding Manifesto Coalition steering group will partake in a process of research and safeguards that will ensure that any corporate engagement will not conflict with the above criteria.

7.1 Process

- All sponsorship, funding or advertising of any value must be approved by the Breastfeeding Manifesto Steering Group through majority vote.
- When bringing on a possible corporate partner the Charity Commission guidance must be looked at in detail: <http://www.corporatecritic.org/info/espffold/ethics5.aspx>
- When looking at a possible funding/sponsorship/advertising/donations it is advised the Steering Group should refer to the Institute of Fundraisings 'Code of Fundraising

Practice' which specifically relates to Charities Working with Business. This is freely downloadable and contains a very useful Risk Assessment section at page 18.

- The Steering Group will also look through lists of the criteria that research organisations commonly track for their clients. This can be done at Ethical Consumer Research's website.
- The Breastfeeding Manifesto Coalition will not accept more than 70% of total income per annum from one corporate partner. This does not include money raised via employee and customer fundraising as part of any corporate partnership arrangements.

When looking into the ethical stance of a company and determining whether it fulfils the Breastfeeding Manifesto Coalition's criteria the Steering Group should bear in mind the following

- whether the company is part of a larger group?
- what are its motives for giving?
- whether it is financially sound?

Contracts with partners must permit The Breastfeeding Manifesto Coalition to withdraw from any partnership where new developments mean that areas of this ethical sponsorship policy become breached.

8. Transparency

A full list of corporate sponsors and donors will be distributed at Coalition Meeting and will be available to all Coalition members when asked.

The Breastfeeding Manifesto Coalition will communicate its commitment to this policy to the organisation's stakeholders. A copy of this policy will be displayed on our website.

9. Stakeholder Involvement

The Breastfeeding Manifesto Coalition is committed to involving all Coalition members and stakeholders in corporate engagement decisions. Stakeholders also include individuals who have signed their name to the Breastfeeding Manifesto. This will bring legitimacy to ethical policy and also to bolder policies.

Logos of voluntary organisations

ⁱ The following ethical policy is an adopted template from ecis cooperate critic. ECIS is a project of ECRA (the Ethical Consumer Research Association/ECRA Publishing Ltd). ECRA was founded in 1988 as a not-for-profit workers' co-operative to 'provide information on the companies behind the brand names and to promote the ethical use of consumer power. More information can be found at www.corporatecritic.org