



NCT Commercial Activities Policy

April 2016

Introduction, scope and authority

This policy sets out whether a specific commercial relationship is acceptable or not to NCT.

It replaces SCRAP, the 2004 NCT Sponsorship, Commercial Relationships and Advertising Policy.

Commercial activity is: any transaction or joint working between NCT and a partner organisation, involving the promotion or exchange of income, goods, services or brand value.

This policy applies to all of NCT including: charitable and trading activities whether undertaken centrally from UK office or in branches; all NCT owned brands, namely MIDIRS and Baby Café; all those representing NCT in any capacity.

NCT expects all partners to be accountable for the information they provide and to behave in good faith in terms of complying with this policy.

This policy is owned by NCT's Trustees. Day to day management is delegated to the Director responsible for fundraising who will consult with the Chief Executive and Head of Research in any complex cases. In exceptional circumstances, a decision may be referred to Trustees. Where a decision is referred to the Charity Board the matter should also be brought to the attention of the Trading Board so as to provide the opportunity to give a recommendation to the Charity Board. Trustees will receive an annual report on compliance with the policy and review the policy every three years.

NCT's greatest strength is the commitment of thousands of volunteers and independent practitioners. We start from a position of trusting NCT volunteers and practitioners to understand and apply this policy in good faith. Where decisions are made beyond UK office that appear to contravene this policy, the matter will be taken up by the Director responsible for fundraising with the Head of Volunteering or NCT College and managed in a timely manner.

Principles

Parents first – trust in parents

NCT believes that, overwhelmingly, parents are motivated to do the best for their children, sometimes in difficult circumstances. Parents, like most other groups in developed societies, are subject to commercial pressure and - where this is not excessive or inappropriate - we believe parents themselves are best placed to decide for whether a particular company, product or service is right for them, drawing on information from a variety of sources. In support of this, we believe parents have a right to independent information from reliable non-commercial sources about products and services relating to pregnancy, birth and bringing up children.

Evidence based – protection from undue commercial pressure

Undue commercial pressure is of particular societal concern when it relates to babies and children, public health including the normal physiological processes of birth and breastfeeding, takes place in a public health setting or targets groups of people who are unwell, or disabled, or financially vulnerable. Parents have a right to independent information from reliable non-commercial sources. NCT works to protect families from undue commercial pressure, and supports the WHO International Code of Marketing of Breastmilk Substitutes and subsequent WHA resolutions, and the Advertising Standards Authority Code of Practice.

A need to raise funds

NCT continues to seek to extend and improve its support for parents. Commercial activity can contribute significantly to our income, and directly enable us to achieve our goals through partnerships as well as extending our reach by putting our information and services in front of new audiences.

A broad understanding of endorsement

People inside and outside NCT will view any link with a company as implicit endorsement of that company, product or service and this perception must be taken into account when considering new partnerships or commercial activities. In making a decision to agree or refuse to work in collaboration with commercial partners, we will be considering the values that NCT *does* want to project as well as the values that it does not.

A need to protect our own reputation and interests

With an appropriate decision-making process and consultation where necessary, NCT will ensure that its reputation and interests will not be damaged by undertaking a particular commercial activity.

Policy

We will not work with any company, brand or product that

<i>Category</i>	<i>Criteria</i>
Fails legal and regulatory non-compliance	<ul style="list-style-type: none"> • Partners must meet all applicable legal requirements • Advertises or promotions must comply with the ASA Advertising Codes (asa.org.uk)
Falls within excluded sectors	<p>Partners, including any parent organisation, must not be:</p> <ul style="list-style-type: none"> - Involved in the manufacture or distribution of weapons - Tobacco manufacturers, or those which are mainly known for tobacco related products - Involved in pornography - Strongly associated with manufacture or supply of alcoholic drinks
Fails our policy on infant feeding	<ul style="list-style-type: none"> • We will not work with formula manufacturers • We will not work with manufacturers of bottles and teats where the manufacturer's brand is strongly associated with such a product • A detailed note on the World Health Organisation Code and subsequent resolutions and NCT's compliance with it is set out below
Fails to evidence claims of benefits	<ul style="list-style-type: none"> • There must be no existing body of evidence of harm, or an existing body of authoritative opinion that suggests the reasonable possibility of harm related to a partner company, brand or product • If medical or other claims are made for a partner company, brand or product, there must be evidence to substantiate the claim
Exerts undue commercial pressure on parents	<ul style="list-style-type: none"> • Partner organisations, brands and products must not be positioned as essential, nor undermine normal physiological processes, normalise a rare situation nor be likely to induce negative feelings, including guilt, in a parent
Is in direct competition with NCT	<ul style="list-style-type: none"> • The partner is not in direct competition with NCT <i>and</i> no significant harm could reasonably be done to NCT's income <p>(We may often choose to partner with organisations with whom we will compete for charitable funds or contracts but would not readily partner with, for example, other providers of antenatal courses)</p>
Might reasonably cause reputational risk	<ul style="list-style-type: none"> • In any partnership, there must not be a clear and foreseeable reputational risk, for reasons beyond those specific exclusions listed above

Attached to this policy is a list of companies and brands with whom we will and will not work under this policy. The list by no means exhaustive but notes companies and brands of particular relevance.

What we ask of commercial partners

Any commercial partner must be made aware that:

- NCT will not allow the interests of the partner to influence the content of NCT material
- NCT retains the right to comment on and criticise the actions of commercial companies and other organisations irrespective of any contract or commercial relationship it has with them
- NCT reserves the right to veto any text produced by a partner connected directly to the NCT partnership
- Where NCT produces text for the publications of other organisations it reserves the right to ensure that its material is not placed next to or alongside material from companies excluded by this policy
- We expect there to be no undue commercial pressure brought to bear as a result of the partnership and thus expect reasonable and appropriate separation between our work to inform and support parents and the promotion of any commercial partnership or products

Infant Feeding and NCT's Commercial Activities Policy

The International Code of Marketing of Breastmilk Substitutes

The International Code of Marketing of Breastmilk Substitutes (The Code) was developed as a global public health strategy and adopted by the World Health Assembly in 1981, with updating resolutions since. The Code aims to protect infant feeding, and thus public health, from the commercial pressures that affect parents, health workers and healthcare systems. The Code sets out provisions for the quality, marketing, labelling and presentation of formula milks, and the marketing of bottles and teats.

The UK Law

The UK regulates the marketing of breastmilk substitutes through the Infant Formula and Follow-on Formula Regulations 2007. These control labelling and restrict advertising. However, they are not as robust as The Code. In particular, the European Directives on which UK regulations are based enable 'follow-on milk' to be advertised with the same brand names and logos as 'infant formula'.

UNICEF Baby Friendly Initiative

Baby Friendly accreditation is based on a set of evidence-based standards for maternity, health visiting, neonatal and children's centres services, with a remit to support best practice in relation to supporting infant feeding and attachment. The National Institute for Health and Care Excellence (NICE) recommends the Baby Friendly Initiative as a minimum standard for postnatal care. Services seeking Baby Friendly accreditation must adhere to The Code and subsequent WHA resolutions.

The UK Context

UK breastfeeding rates are low by international standards. Eight out of ten mothers find that they have to stop breastfeeding before they want to, often in the first few weeks. Determinants of infant feeding behaviours are multifactorial and enabling positive experiences requires a collective societal effort. In line with the evidence, NCT promotes and protects the conditions that support mothers' decisions to breastfeed. These include WHO code compliance.

What does this mean for NCT?

NCT provides information, education and support for expectant and new parents, and undertakes to adhere to The Code. NCT practitioners, breastfeeding counsellors and peer supporters often work within a health or public service environment, a context specifically covered by The Code, Baby Friendly Initiative and NICE Quality Standards. The Code intends to restrict the influence of commercial interests, but does not restrict the provision of independent information about content of formula milks, bottle feeding or solid food. NCT believes that *all* parents should have access to evidence-based and non-commercial information about baby feeding, to support them in whatever way they decide to feed their babies. This position reflects and is compatible with The Code.

NCT therefore commits to the following within its services for parents:

- To provide independent and evidence-based information on all aspects of baby feeding (breastfeeding, formula milks, bottle feeding, and introducing solids), to reflect families' unique circumstances and changing needs.
- To ensure that there is no advertising of infant formula, follow-on formula, bottles or teats, nor of drinks or solid food for babies less than six months old.
- Not to provide free samples of infant formula, follow-on formula, bottles, or teats, nor of drinks or solid food for babies less than six months old.

NCT will not work in partnership with manufacturers of formula milks, or manufacturers of bottles or teats where the manufacturer's brand is strongly associated with such a product. In such cases, the name of a proprietary brand of formula milk or associated product is often the same as the name or logo of the company, thus the donor name can serve as an advertisement for the product itself.

Overview of the International Code of Marketing of Breastmilk Substitutes

The Code applies to the following products: breastmilk substitutes, including infant formula; products, foods and beverages marketed or represented as suitable for the partial or total replacement of breastmilk; feeding bottles and teats.

Information and education materials on infant feeding for expectant and new parents

- Information and educational materials should be independent, objective and evidence-based.
- Information and educational materials should include: health benefits of breastfeeding, preparation for and maintenance of breastfeeding; and difficulties of introducing partial bottle feeding or reversing the decision not to breastfeed.
- Where appropriate, information and educational materials on the use of infant formula should be provided. This should include: social and financial implications; health hazards of inappropriate foods or feeding methods; and health hazards of improper use.
- Formula feeding should be demonstrated only to those who need to use it and information should include clear explanation of the risks of formula feeding and hazards of improper use.
- Free samples of the products should not be distributed
- There should be no advertising or other form of promotion of the products. Promotional devices at retail level (e.g. discounts or special displays) are prohibited.
- Company representatives may not initiate direct or indirect contact with mothers.

Health Workers

- Health workers should be responsible for encouraging and protecting breastfeeding
- Any materials given to health professionals by manufacturers and distributors should be limited to scientific and factual matters, and not used to promote products.
- Product samples should only be provided when necessary for professional evaluation or research.
- Care must be taken to avoid conflicts of interest. Potential conflicts include: manufacturers and distributors giving material or financial incentives to health workers; financial support for health workers; and financial support for programmes relating to infant health.

Health care systems

- Promotion of any product is prohibited in a health care facility, including product display, placards, posters or distribution of materials provided by manufacturers and distributors.
- Donated equipment and materials should not refer to brand names
- Manufacturers and distributors are prohibited from providing products to health care facilities at free or low cost.

Labelling

- Information on labels for infant formula should: be simple and accessible; include a statement about the health benefits of breastfeeding; state that the product should only be used after consultation with a health professional.
- Labels must contain explicit warnings on labels regarding the risks of contamination of powdered formula with pathogenic microorganisms
- Labels must conform guidelines on safe preparation, storage and handling of powdered infant formula.

- Pictures or language that idealizes the use of infant formula should not be used.
- Nutrition and health claims on labels for breastmilk substitutes should not be permitted unless allowed by national legislation.

Companies, brands and products that we will and will not partner – the red and green list

The attached list indicates companies and products that are (Green) and are not (Red) allowed under the NCT Commercial Activities Policy.

This list will be updated on an ongoing basis, and the most recent version should be accessed via babble.

This list should be read in conjunction with the NCT Commercial Activities Policy, as there may be instances where companies are listed as Green, but have restrictions around the type of partnership activity we can agree to.

This list should not be treated as exhaustive, and branches should refer to the Babymilkaction website for an up to date list of Nestle products to be avoided (<http://www.babymilkaction.org/nestle-boycott-list>).

Acceptable

Formula distributors

We will work with companies who distribute (but do not manufacture) formula milk -except where the distributor is primarily associated with such a product.

Bottles, teats and dummy manufacturers

We will work with manufacturers and distributors of feeding bottles, teats and dummies - except where the manufacturer is strongly associated with such a product.

Complementary/weaning foods

We will work with manufacturers of baby foods where they are in compliance with the WHO Code – primarily only marketed as being suitable for 6 months onwards.

Other pregnancy, birth and parenting products

If any claim of medical, health or other benefit is made, the company must have research to support the claims for assessment by NCT (e.g. colic remedies, white noise devices, nutritional supplements, alternative remedies).

Already cleared are:

Sudocrem

TENS machines

Aromatherapy oils if not making claims

GRO

Events Companies

Clarion (Baby Show)

Food or beverage

Starbucks

Piccolo

Supermarkets / Baby stores

ASDA

Aldi

The Cooperative

Iceland

Lidl

Morrison's

Sainsbury's

Tesco

Waitrose

Boots

John Lewis

M&S

Kiddicare

Mothercare / ELC

Babies R Us / Toys R Us

Not acceptable

Alcoholic products & manufacturers

Tobacco products & manufacturers

Weapons products & manufacturers

Pornography products & manufacturers

Formula milk manufacturers

See Danone and Nestle brands listed below

Bottle, Teat and Dummy Manufacturers

Philips Avent

Tommy Tippee

Mam

Dr Browns

NUK

Non-NCT antenatal courses

Baby calming

Active Birth

The Daisy Foundation

Hypnobirthing

The Blooming Bunch (London focus)

Danone brands:

Activia

Actimel

danio

Oykos

Shape

evian

Volvic

Badoit

Aptamil

Cow & Gate

nutrimum

Nutricia

Nestlebrands

Coffee – Nescafé including:

Alta Rica

Black Gold

Blend 37

Cap Colombie

Cappuccino

Caro

Decaff

Espresso

Fine Blend

Gold Blend

Kenjara

Nescafé Ice

Nespresso coffee and machines

Organic

Dairy products:

Carnation

Coffee-Mate

Extreme Viennois

Fussells

Ideal

LC1

Munch Bunch yoghurts

Rachel's Dairy

Rowntree yoghurts and ice creams

Simply Double

Ski yogurts

Sveltesse yogurts

Tip-Top

Confectionery & snacks:

Aero

After Eights

Animal Bar

Baci Chocolate

Black Magic

Blue Riband

Breakaway

Caramac

Chocolate Cuisine

Dairy Box

Dairy Crunch

Double Cream

Drifter

Fab

Fruit Pastilles

Heaven

Henri Nestlé Collection

Jellytots

Kit Kat

Lion Bar

Lyons Maid Ice Cream

Matchmakers

Maxibon

Milky Bar

Munchies

Nestlé Ice Cream

Polo

Quality Street

Rolo

Rowntrees Fruit Gums

Smarties

Toffee Crisp

Toffo

Tooty Frooties

Walnut Whip

Willy Wonka

Yorkie

Mineral/bottled water:

Aqua Panna

Aquarel

Buxton

Contrex

Perrier

Pow-wow

San Pellegrino

Santa Maria

Valvert

Vittel

Other drinks:

Build-up

Milo

Nesquik

Nestea

Processed meals:

Buitoni pasta & canned foods

Herta

Jenny Craig

Maggi

Osem/Tivall

Rowntrees Jellies

Cereals:

Cheerios & Honey Nut Cheerios

Cinnamon and Golden Grahams

Clusters

Cookie Crisp

Shreddies

Fibre 1

Fitnessse

Force Flakes

Fruitful

Golden Nuggets

Nesquik cereal

Shredded Wheat including: Bitesize, Fruitful, Honey Nut

Shreddies: Coco and frosted

Specialised:

PowerBar

Freida's Fast Foods

Cosmetics:

Biotherm

Body Shop

Cosmence

Garnier

Helena Rubenstein

Innéov

La Roche-Posay

Lancome

L'Oreal

Matrix

Maybelline

Metamorphosis

Plénitude

Redken

Pet Foods:

Arthur's

Bakers

BETA

Bonio

Felix

Friskies

Go-Cat

Go-dog

Gourmet

One

Pro Plan

Purina

Spiller's

Vital Balance

Winalot

Abott Nutrition

Mead Johnson