



## UNICEF UK BABY FRIENDLY INITIATIVE INFOSHEET

# WILL HOLDING EVENTS IN COMMERCIAL PREMISES AFFECT OUR BABY FRIENDLY ACCREDITATION?

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**October 2017**

### Introduction

Unicef UK has received a number of queries regarding Baby Friendly accredited midwifery and health visiting services holding events, such as clinics and parenting classes, in commercial premises such as supermarkets and pharmacies. As children's centres, health clinics and other traditional venues are closing, some trusts are struggling to find suitable places to hold events, for example clinics, mother support groups and parent education classes. Stores which can offer sufficient space can seem like a good option as they are usually located in central locations that are easy to get to and are well known, and this may encourage mothers to attend. The venues are also often offered free of charge as the stores will welcome more footfall on their premises, and this can be very attractive to services when there is little money available to keep groups and classes going.

### Background

The Unicef UK Baby Friendly Initiative requires that all facilities seeking Baby Friendly accreditation adhere to the [International Code of Marketing of Breastmilk Substitutes](#) (the Code) and subsequent WHA resolutions. The Code includes specific recommendations to manufacturers and distributors of breastmilk substitutes (which includes infant formula, follow on formula, milks for special groups, milks for toddlers, foods marketed for infants under six months of age, as well as bottles, teats and dummies). As supermarkets, pharmacies and other shops generally sell products that fall within the scope of the Code, they are defined as 'distributors'. Some also sell own brand foods, bottles and teats, which means they are a 'manufacturer' as well.

The Code allows manufacturers and distributors to make products available for sale (i.e. they sell them to their customers), but they must not promote them. Promotion includes any advertising, free samples, special offers, discounts, special displays, shelf positioning (e.g. prominent, end of aisle displays), demonstrations by sales representatives, etc. of any product that comes within the scope of the Code.

The UK has, however, only partially implemented the Code; UK law only prohibits the promotion of formula milk intended for babies under six months old. It does not cover formula for babies over six months, baby foods marketed for infants under six months, bottles, teats and dummies. Therefore, **in the UK promotion of these products is not illegal**. The Baby Friendly Initiative [campaigns for UK governments to fully implement the Code](#), and requires that accredited services adhere to the Code in full.

### Using a venue that sells products under the scope of the Code

Before deciding to hold an event in commercial premises that sell baby food and equipment, consider if there are other places willing to offer space for events and classes. Examples include public libraries, foyer spaces in legal firms, DIY stores, offices of a local political party, NGO or charity, or colleges of higher education.

When no such spaces are available, and you are considering choosing a venue that sells products under the scope of the Code, it is important to weigh up the potential good or harm that this choice could have. The decision can be a complex one and should consider if the location means you would be reaching families who would otherwise not attend or, on the other hand, if families would be pressured to buy products at the venue.

If you are considering using these venues for an event aimed at pregnant women or new parents there are several points to consider:

- **Does the venue (i.e. supermarket, pharmacy etc.) violate the Code?**

Talk to your contact at the venue about the Code, including why it is important and what it means for your service. Walk around the whole venue with them and look for any signs of promotion (as described above) for infant milks, baby foods marketed for infants under six months of age, bottles, teats or dummies. If any is found, discuss whether it can be stopped. Remember that promotion of food and drink intended for babies over six months is not illegal in the UK, and so a careful explanation will be needed as to why this needs to be removed. If there is no promotion, or if your contact is receptive to removing existing promotion and has the power to instigate change, this is a good sign. If the employee is not receptive, it may be worth considering that this is not a suitable venue for your event.

- **Could the venue violate the Code in the future?**

The answer to this is almost certainly yes. Offering to educate employees to understand and adhere to the Code could promote sustained good practice. Regular venue visits will give you the opportunity to check that there is no promotion and to raise concerns if any is found.

- **Does the space to be used for the event encourage the sale of products that come within the scope of the Code?**

Walk the route through the store that parents will take to get to your event and consider the space you are using. This all needs to be completely free of promotion of all products that come within the scope of the Code.

- **Could the space to be used for the event put pressure on parents to buy other products, even if these are not within the scope of the Code?**

It is worth considering whether promotion of other products could pressurise the parents attending your events to buy things that they may not need or be able to afford. Although this is not part of the Baby Friendly standards, there is an argument to be made for public services not being used as a conduit for such selling. Again, consider the route through the store that parents will take and the space you are using. If you feel that there is too much promotion of products aimed at parents then you may need to ask for changes or consider not using the venue.

### How will this be assessed?

If a service is using a commercial venue for its events, the lead assessor will explore what action has been taken to ensure that the event is Code compliant. The complexities of each case will be taken into account (e.g. whether alternative premises were available), and she may also request a visit to the venue. On interview, if staff or mothers state that they have experienced Code violations in a commercial venue, this would be referred to the Designation Committee and may affect accreditation.

### Glossary and further reading

- **Breastmilk substitute:** any food or drink being marketed as a partial or total replacement for breastmilk, whether or not suitable for that purpose.
- **The Code:** [International Code of Marketing of Breastmilk Substitutes](#).
- **UK law:** [Formula and Follow on Formula Regulations 2007](#).
- **Manufacturer:** a company that manufactures breastmilk substitutes, bottles, teats and/or dummies.
- **Distributor:** a company that sells breastmilk substitutes, bottles, teats and/or dummies.
- **Marketing:** all activity from manufacture to sale, including both supply and promotion of the product.
- **Promotion:** any activity which is designed to sell more of the product, including but not exclusive to: paper or web based advertising, discounting, shelf positioning in shops, brand awareness raising, demonstrations by sale representatives, free gifts.
- **Available for sale:** selling the product (for example, in a shop or online).