



Partnership Policy

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1. Purpose

The purpose of this policy is to:

- protect the integrity, independence, and decision-making processes of New Baby Network CIC
- build public and service-user trust in our impartiality and evidence-based support
- set transparent boundaries for individuals and organisations seeking to partner with or support New Baby Network CIC
- protect new parents, infants, and families from emotional, predatory, or commercial exploitation

2. Scope

This policy applies to all directors, staff, volunteers, contractors, and external partner organizations collaborating with New Baby Network CIC across physical and digital spaces (including social media groups and messaging channels).

3. Conflicts of Interest

Directors, staff and volunteers will strive to avoid any conflict of interest between the interests of New Baby Network CIC on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.



a) Examples of Conflicts of Interests

- A director, volunteer or staff member also has a leadership role in an organisation which may compete for the same funding
- A director, volunteer or staff member has a private enterprise that provides services of interest to families supported by New Baby Network CIC

b) Disclosures

Before beginning volunteering or employment, all staff, directors, volunteers or partners must declare any relevant commercial, professional, or personal interests that could be a potential conflict of interest. If a conflict of interest arises during the course of volunteering or employment, this should also be declared.

New Baby Network CIC maintains a confidential Register of Interests reviewed annually by the Board.

Anyone with a conflict of interest regarding a partner, funder, or decision must recuse themselves from relevant discussions and voting.

Failure to disclose a conflict of interest, or acting outside of the best interest, policies or procedures of New Baby Network CIC while in a volunteer or employed role will cause a problem solving procedure to be enacted and may lead to the ending of the relationship.

Directors, staff, and volunteers must avoid any actual, potential, or perceived conflicts of interest between the mission of New Baby Network CIC and their personal, professional, or financial interests.

4. International Code of Marketing of Breastmilk Substitutes

New Baby Network CIC adheres to the code and expects all staff, volunteers, suppliers and partners to do the same.

What is the code?

The International Code of Marketing of Breastmilk Substitutes (the Code) is an international health policy framework to regulate the marketing of breastmilk substitutes in order to protect breastfeeding. It was published by the World Health Organisation in 1981, and is an internationally agreed voluntary code of practice.

The Code regulates the marketing of breastmilk substitutes which includes infant formulas, follow-on formulas and any other food or drink, together with feeding bottles and teats, intended for babies and young children.

The Code also sets standards for the labelling and quality of products and for how the law should be implemented and monitored within countries.



Restricting marketing does not mean that the products cannot be sold, or that factual and scientific information about them cannot be made available. Neither does it restrict parents' choice. It simply aims to make sure that their choices are made based on full, impartial information, rather than misleading, inaccurate or biased marketing claims.

Adhering to the code and subsequent relevant WHA resolutions includes but is not limited to:

- No advertising for infant feeding products (breastmilk substitutes including infant formula, follow on or growing up milks, other foods/beverages promoted as suitable for babies during the first six months of life, feeding bottles and teats) anywhere within our services.
- No contact between manufacturers of the above products and pregnant women or mothers
- No items bearing company logos of manufacturers of the above products on service premises or used by its staff/volunteers. Examples include: mugs, stationery, diary covers, key fobs, lanyards, pens, tourniquets, gestational / age in weeks calculators, weight conversion charts, post-it note pads.
- No free samples or giveaways of any of the above products to staff, volunteers or service users
- Only scientific and factual information, free from commercial bias, used in the care of babies and their parents

Resources:

International Code of Marketing of Breast-Milk Substitutes:

<https://www.who.int/nutrition/publications/infantfeeding/9241541601/en/>

The International Code of Marketing of Breast-milk Substitutes: Frequently Asked Questions (2017 Update), Geneva, Switzerland, World Health Organization; 2017. Licence: CC BY-NC-SA 3.0 IGO. [The International Code of Marketing of Breast-milk Substitutes](#)

Working Within the International Code of Marketing of Breast-Milk Substitutes

<https://www.unicef.org.uk/babyfriendly/wp-content/uploads/sites/2/2020/02/Health-Professionals-Guide-to-the-Code.pdf>



5. Multilevel Marketing Companies

New Baby Network CIC exists primarily to provide evidence based information to support and empower families, and our staff and volunteers abide by our code of conduct. The code of conduct makes clear that involvement in the New Baby Network CIC should not be used to reach families for personal gain or advantage or to recommend or champion any brand, company or model of product.

Staff/volunteers have the right to engage with MLMs in their personal lives, but they cannot use their affiliation with New Baby Network CIC, official communication channels (WhatsApp groups, email lists), or service spaces to recruit or promote MLM products

What are Multi Level Marketing Companies (MLMs)?

An MLM is defined broadly as any business that recruits distributors, resellers, consultants, or others for the sale or representation of a product or service that does not originate from the person recruiting/selling. This includes matrix marketing and direct sales companies, in addition to "Get Rich Quick" businesses.

In determining if an organisation is an MLM or not, the New Baby Network CIC will consider the following factors:

- Offering commissions to recruit new distributors
- Business is structured around hosting parties where guests purchase products
- Requiring new distributors to purchase costly inventory or "start-up kits."
- Profits from sales are derived from recruited sellers ("downline"), rather than solely their own sales
- Commissions derived from sales moves "upline."
- Monetary distributions originate from funds paid by new or existing participants
- Unrealistic or unsupported promises regarding profits or return on investment.

This means New Baby Network CIC, its staff and volunteers:

- will not allow MLM reps to recruit or sell on their premises/groups
- will not sell MLM products at New Baby Network events or groups
- will not use New Baby Network social media influence to promote MLM in any way
- will not accept donations or giveaways or promote competitions from MLM companies



6. Developing Partnerships

a) Rationale

It brings great value to New Baby Network as an organisation to work with a variety of individuals and organisations who share our vision and values or conduct activities that further a shared goal.

However, we have a duty of care to ensure that harmful practices do not affect our service users through our partnerships, and that any collaborative working brings benefit to all parties.

b) Due Diligence and Screening

Any partnership should be discussed at board level to highlight and attempt to mitigate any potential risks involved. Benefits and alternatives should be considered.

This process includes but is not limited to background checks and a review of the potential partner's reputation, past collaborations and adherence to the International Code of Marketing of Breastmilk Substitutes. It may also include a review of any relevant policies and procedures such as safeguarding, EDI, health and safety.etc.

A partnership agreement should be put into place that outlines expectations, deliverables and any other relevant information to ensure the protection of the integrity of New Baby Network CIC.

c) Safety and Accountability

Any potential partner must demonstrate a commitment to the safety and well-being of service users. They should have policies and procedures in place to prevent harm, abuse, neglect, or exploitation, especially of vulnerable service users. .

Any concerns or incidents related to the safety or well-being of vulnerable service users in the context of a partnership must be reported immediately to New Baby Network's designated safeguarding officer, following safeguarding procedures.

New Baby Network will take prompt and appropriate action in response to any concerns or incidents, which may include suspending or terminating the partnership if necessary.

d) Monitoring, Review and Termination

All partnerships will be subject to ongoing monitoring and review to ensure that they continue to align with our vision and values.

Periodic evaluations will be conducted to assess the effectiveness and impact of partnerships on the welfare of vulnerable service users.

New Baby Network reserves the right to terminate any partnership that is found to be in violation of this policy or poses a risk to the welfare of service users. This may be immediate in the case of:

- The partner violates the WHO Code or MLM restrictions.

- A serious safeguarding concern or breach occurs.
- An undeclared conflict of interest jeopardizes CIC decision-making.
- The partner's actions bring New Baby Network CIC into disrepute.



Policy first agreed: May 2020

First review: June 2024

Second review: February 2025

Third review: August 2026