



Micronutrient Forum Policies and Procedures: Private Sector Engagement and Conflicts of Interest Policy

Introduction

The Micronutrient Forum (MN Forum) recognizes both the private and public sectors as being important stakeholders among those engaged in food and nutrition related activities. The purpose of this document is to provide a transparent policy and procedures for engagement of the MN Forum with the private sector and for the declaration and management of conflicts of interest. Parts of this document have been adapted from the International Union of Nutritional Sciences (IUNS) private sector engagement policy. The IUNS private sector engagement policy is based on internationally accepted principles and rules, such as those used by United Nations organisations¹, the World Economic Forum², governments and others³.

The vision of the MN Forum is *a world where all people have the micronutrients they need for survival and optimal health*, and its mission is *to be a global leader bridging scientific advances with policy and programs across multiple sectors, by providing space for capacity development and continuous dialogue for action to ensure micronutrient adequacy for survival and optimal health throughout the life cycle*.

The MN Forum strives towards its mission by engaging with diverse stakeholders, including the private sector. Engagement with the private sector presents opportunities but also risks, such as:

- greater corporate influence over the direction and activities of the MN Forum, such as conferences, workshops, information gathering and dissemination, and the promotion of nutrition research, academic training and public nutrition work, particularly as related to using such influences for the purpose of increasing market shares to the detriment of good nutrition;
- loss of legitimacy with key constituencies and funders due to negative perceived cooptation by a given entity's interests;
- regarding external engagements as ends in themselves, thereby undermining strategic direction and long-term strategies;
- funding driven shifts in priorities of the MN Forum.

¹See one example in the Bulletin of the World Health Organization. vol.79 no.8, Geneva 2001.

²http://www.gppi.net/fileadmin/gppi/Publication_OCHA.pdf.

³There are reports on business influences on nutrition research in specific ways that do not foster credibility of evidence provided by the projects (BMJ 2007, vol. 334).

MN Forum recognizes these risks and has adopted this policy with the aim to minimize the risks and maximize the benefit of any engagement with the private sector, and to lay out procedures for the timely identification and management of real and/or perceived conflicts of interest. This document will also serve to increase private sector understanding of expectations that would form the basis of engagement with the MN Forum and any type of agreement developed to formalize such engagement.

Defining the private sector

The 'private sector' is recognized by the MN Forum to be 'for-profit' enterprises or companies, whether large or small, privately owned, employee owned, state owned or stock-market listed, and legally registered.

Business interest non-governmental organizations (BINGOs) also comprise the private sector. These are organizations that are funded to service 'for-profit' enterprises or advocate their interests, and include but are not limited to research foundations, trade associations, lobbying groups, charitable foundations, and consultancy firms, that may or may not be separate legal entities with an 'arms-length' relationship to the 'for-profit' enterprise or enterprises that provide(s) their funding. Such organizations may or may not be registered as not-for-profit, with or without charitable status, and may or may not express an explicit public purpose, but report over half of their income in the past year coming from the private sector (as donors, members or clients).

Principles of Engagement

Collaborative engagement of the MN Forum with the private sector is guided by the following six principles. For each, the general basis of the principal and how it will be addressed is listed. Additional safeguards to ensure compliance with the principals are listed below.

1. *Relevance*: Any collaborative activities with the private sector must have relevance to and be in support of achieving MN Forum objectives. The MN Forum shall establish and pursue its own agenda for private sector engagement, in addition to responding to any proposals received.
2. *Declaration and Management of Conflict of Interests*: For the credibility of MN Forum it is important to show independence from commercial or other interests that may not be in line with MN Forum rules and regulations. In all private sector partnerships the MN Forum will undertake an assessment and subsequent declaration of potential conflicts of interest, in keeping with the MN Forum's Private Sector Engagement Policy on such conflicts and subsequent management of these or exclusion from participation.
3. *Privacy*: The MN Forum believes in safeguarding the privacy of its constituents and will therefore not sell or otherwise share email lists with private sector companies.

4. *Transparency*: The MN Forum will strive to ensure transparency in its relations with the private sector by regularly posting details of such relations, including membership on committees, sponsorship and donors among other types of engagement on the MN Forum website.
5. *Diversity*: The MN Forum will strive to ensure a diversity of private sector engagement, to ensure that no one type dominates. To do this, the MN Forum will contact and seek to engage with diverse areas of the private sector as part of its proactive agenda.
6. *Good/Democratic Governance*: The MN Forum will respect and apply the principles of Good/Democratic Governance as defined by the UN in running the MN Forum as an organisation, including activities such as sponsorship, collaboration or other types of engagement with the private sector. All potential engagement with the private sector will be vetted by the Steering Committee and accepted only with majority approval.

In accordance with these Principals of Engagement, the MN Forum will not seek or accept financial support from private sector companies or organizations that trade and/or produce armaments, manufacture tobacco products, use or tolerate child or compulsory labour, or who participate in or tolerate human rights abuses. In addition, the MN Forum will not accept funding from any producers of breast-milk substitutes or any charitable or other foundation primarily funded by a producer of breast-milk substitutes. At such a time as better methods for monitoring compliance with the International Code of Marketing of Breast-milk Substitutes becomes available, the MN Forum will reconsider this policy. The MN Forum Steering Committee reserves the right to consider the public reputation of any company or group of companies and to decide if that reputation is compatible with MN Forum's mission and the principals outlined in this document.

Purpose and types of MN Forum engagement with the private sector

The purposes of engagement of the MN Forum with the private sector can be divided into two main categories: either seeking to receive their support and resources, and/or seeking to promote activities that would contribute to the MN Forum's mandate. All engagement with the private sector should include and foster activities that are aligned with the MN Forum's strategic objectives and thus contribute directly or indirectly to the mission of the MN Forum.

The types of engagement with the Private Sector by the MN Forum can be categorized into two broad areas, namely *financial support (monetary and/or in-kind)*, and *partnering*.

- a. ***Financial support*** to the MN Forum by the private sector is intended to support the activities of the MN Forum and may be provided in the form of Donations, Sponsorships or In-kind contributions. All financial support for the Forum will be declared in accordance with the type of contribution, outlined below.

Donations: Refer to funds that are provided to the MN Forum for general support or specific tasks, for example, support for Secretariat activities, conference start-up

activities, commissioned papers or projects, awards, among others. They are distinguished from *Sponsorships* in that they are guided by a contractual relationship between the Host organization of the MN Forum Secretariat and the donor. Such funding must be acceptable to the Steering Committee and in line with the Private Sector Engagement policy but the terms of the contract will be negotiated between the Secretariat and the donor; additional Private Sector Engagement guidelines may be required by the Host organization. Acknowledgement of the donations for MN Forum activities will be in-line with the terms laid out in each individual contract.

Sponsorships: Refer to funds that are provided to the MN Forum for support of the biennial global meetings. Such funds may be used to cover participant travel and expenses, meals at the conference, facility and logistics costs among others. In the interest of minimizing real and/or perceived conflicts of interest, sponsor funds will be non-designated (i.e., there will be no association in the conference materials between a given contribution and any specific symposium or conference participant), and acknowledgement for the contribution will be in line with the Sponsorship Prospectus developed for each biennial meeting. The use of the Sponsor funds will be determined by the Steering Committee and managed by the Host organization of the MN Forum Secretariat but would not imply a contractual relationship between that organization and the Sponsor.

In-kind contribution: Refers, for example to direct purchase of air travel tickets, meals, among others. Such contributions will be acknowledged in accordance with the approximate monetary value of the contribution (according to sponsorship categories outlined in the Sponsorship Prospectus) and in line with the sponsorship criteria outlined here. For in-kind contribution for which a monetary value cannot easily be assigned (e.g., provision of space for meetings, printing of reports, access to information networks etc.), the contribution will be acknowledged with reference to categories such as: meeting logistics support; printing and dissemination support, and so on.

- b. ***Partnering***. The MN Forum may wish to partner with the private sector, supporting efforts to improve investment and knowledge related to products and practices that would contribute to nutrition-related goals relevant for the MN Forum. Each potential opportunity for partnering with the private sector must be discussed individually by the Steering Committee and assessed for alignment with the goals of the MN Forum and principals of engagement with the private sector.

Guidelines for the Declaration and Management of Conflicts of Interest

The MN Forum recognizes conflicts of interest as *any interest that may affect or be reasonably perceived to affect, an individual, group, or organization's objectivity, judgement, and/or independence*. The nature of such interests may vary from financial to professional. In line with the MN Forum's principal of transparency, all Steering Committee and Secretariat members are

required to prepare a statement of potential conflicts of interest. All real or potentially perceived conflicts of interest that are deemed significant will be declared to the Steering Committee. If interests of individuals, group or organizations involved in MN Forum activities are deemed significant and the Steering Committee deems that such interests may compromise the goals and/or reputation of the MN Forum, the individuals, groups or organizations may be asked to refrain from participation in the activities specifically related to that interest.

Management, Monitoring and Reporting of Private Sector Engagement and Conflicts of Interest

The Chair of the MN Forum is charged with the responsibility of implementing this Private Sector Engagement and Conflict of Interest Policy and ensuring that all MN Forum activities (fund raising, conferences, meetings, workshops, etc.) follow the procedures laid out herein. The Chair of the MN Forum will provide regular updates on interactions of the MN Forum with the private sector to the Steering Committee and will published an overview of such activities on the MN Forum Website once every two years, in line with the dates of the biennial meeting.

All Steering Committee members are required to advise the Chair of the Steering Committee immediately for all potential opportunities for engagement with the private sector; all such opportunities should be assessed early in discussions for alignment with the policies and procedures outlined herein.

All copies of the conflict of interest forms will be stored under lock and key at the Host organization of the MN Forum Secretariat and shall be available for public inspection upon request from the Chair of the Steering Committee.

In order to ensure it maintains and utilizes its unique competencies and resources, the MN Forum will periodically review and revise as appropriate its rationale and strategy for private sector engagement. The next review is proposed by mid-year 2016.

The Private Sector Engagement and Conflicts of Interest Policy has been presented by the Chair to the Steering Committee and approved on 7 October 2013