RESPONSIBLE RETAILING:

RETAIL IRELAND
CHILDRENSWEAR
GUIDELINES
As Minister for Children and Youth Affairs I am delighted to endorse *Retail Ireland Childrenswear Guidelines*.

Since taking office I have begun implementing a series of measures to enhance Ireland’s culture of child protection and preserving the special space that is childhood. But safeguarding our children and protecting childhood is a task which falls to all of society, to everybody in the community. We all have a responsibility and in this spirit I believe there is a role for the retail sector.

Earlier this year I extended an invitation to the Irish fashion retail sector to develop a set of guidelines on the retailing of childrenswear in Ireland, similar to those prepared by the British Retail Consortium. I wish to thank Retail Ireland for accepting my invitation and preparing these guidelines. I hope that all Irish childrenswear retailers will now sign-up.

It is important to note that these guidelines are not just about restricting what retailers can sell, but instead provide a more constructive guidance on best practice on a range of issues such as styling, age-appropriateness, size, labelling and marketing.

I believe this code will play an important role in informing future decision-making, for example on the appropriateness of new and emerging fashion trends for children, while further providing a framework within which retailers can responsibly consider and respond to growing concerns over body-image among children.

The preparation of these guidelines is yet another example of how working together we can, as a State and society, help to foster a culture where childhood is preserved and children are protected.
INTRODUCTION

These voluntary guidelines show that Retail Ireland members recognise their responsibilities by providing age appropriate clothing design and ensuring the marketing of those clothes to parents is carried out in ways which do not sexualise or unduly gender stereotype children.

Good retailing involves the provision of what customers want, when and where they want it and at a competitive price. Ireland’s retail environment is extremely competitive and all retailers take great care to ensure their offer meets the wishes of their customers. The customer base of each retailer can vary widely, which means that each retailer develops a unique offering to their customer.

However, all responsible retailers share a common commitment to deliver the right products in a way that protects children and preserves the innocence of childhood.

These guidelines draw on established good practice among Retail Ireland members. As with the British Retail Consortium (BRC) guidelines already in place in the UK, they act as a framework within which each retailer’s policies are developed. The guidelines are not a replacement for each individual retailer’s best practice in this area, as their policies will be tailored to meet and reflect the specific circumstances of the retailer and its customers.

RETAIL IRELAND APPROACH

The Retail Ireland Childrenswear Guidelines closely mirror the guidelines on childrenswear signed in 2011 by members of the BRC. This makes sense for three reasons:

- There is a commonality of members between Retail Ireland and the BRC and therefore a commonality of existing best practice.
- Ranges and styles of children’s clothing are in many cases common to both markets and consumer tastes tend to be similar.
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As with the BRC guidelines, for the purposes of the Retail Ireland Childrenswear Guidelines, childrenswear means all clothing, footwear and accessories designed and marketed for children under the age of twelve years. It does not include dressing up clothes or toys and does not cover teenage fashion or babywear.

Also, as with the BRC guidelines, some of the issues allow for very clear recommendations while others are more subjective and rely on individual taste, the circumstances surrounding the use of a garment and/or the age and physical development of the child wearing the garment. That is why in some cases the guidelines outline clear minimum standards, while in other cases, different approaches are acceptable provided certain concerns are taken into account.

Retail Ireland members are of the clear opinion that operating under these guidelines is not only the right and responsible thing to do, but it is also a commercially sensible course of action. Retailers operate in a highly competitive market, and rely on the trust and respect of their customers. It will be Irish customers who decide on the acceptability of the clothing ranges on offer and how successfully the signatories are adhering to these guidelines.

Guidelines in this area must be flexible and responsive to changing fashions, textiles and technologies and will be subject to review. Retail Ireland and its members will meet regularly to review their implementation, monitor progress and exchange experiences. We will also, provide the Minister for Children and Youth Affairs with an annual report outlining what we hope will be the successful implementation of the guidelines.

The initial signatories to this code are Retail Ireland members. We hope that within a short time more retailers will see the benefits that the code brings and will become signatories. They are hereby invited to do so.

Any parent, guardian or concerned person who would like to comment can do so by emailing retail@ibec.ie
STYLING

All parents will know that the clothes children wear need to be suitable for a multitude of uses. Children attend school, play with their friends and run around their homes and gardens — often on the same day. Childrenswear is also worn on the beach, in the park and by the pool.

These facts determine the choices of styling, fabric/material, construction and colour of children’s clothes. The age of children for whom the clothing is designed also determines these things as the BRC guidelines note, “leggings may have few age-related design issues whereas dress necklines may vary to some degree between pre-school children and those just pre-teen”.

Existing good practice in Irish retailers allows for internal company consultation on the sizing, cut, design and fashion trend, including the colour, sheerness and pattern of fabrics, as well as the age appropriateness of children’s clothing.

Slogans

Slogans and imagery, including the use of licensed images and brandmarks, must be age appropriate and not sexually suggestive, demeaning, derogative or containing political slogans or images that could be interpreted as such. Slogans deemed humorous should be tested against a broad range of views to determine if they could cause unforeseen and unintended offence. Careful consideration should be given to what could be described as “gender specific” slogans.

Modesty

Signatories to these guidelines will ensure that fabrics and cut should provide for modesty. As with the BRC guidelines, sheer fabrics without lining are not acceptable for childrenswear bodices or skirts, but may be, with care, on other parts of the garment. Signatories also undertake to ensure that the colour, pattern and decoration of children’s garments are chosen with care.

Obviously, retailers must carefully consider issues such as skirt and short length, neck or shoulder line and underwear shape. Retailers should take into account the stretch properties of the fabric used in the clothing and consider the intended age group for the clothes.

It is important that children’s clothing ranges allow all children to be confident about their developing bodies and enjoy play and physical activity while maintaining modesty. For example, it is likely that for trousers and leggings a single design may be appropriate for all sizes up to 12 years. However, some styles may need adjustment to ensure the fit is appropriate for the intended age - younger and older versions of the same dress style may require a different neckline.

This is particularly the case for children’s clothing based on adult fashion trends. Such designs should be interpreted in an age-appropriate way. This may result in different choices of cut, fabric or embellishment. In this regard, particular attention should be paid to party wear.

Colour

Colour ranges should also be age-appropriate and suitable for the item of clothing. As an example, black should not be used for first bras, but may be suitable when included with other bright colours for knickers or underpants as long as the guidelines for modesty and use of slogans are maintained. However, black would be perfectly suitable and highly practical for trousers for nearly all ages and may in fact be required for school uniforms. Retailers should attempt, wherever possible, to provide a choice of colours, including gender neutral choices.

Underwear

Retailers must show great care when it comes to the design of underwear. Irish retailers who are signatories to these guidelines should note that, as the BRC guidelines state, “simple decoration and a wide choice of colours and patterns are welcomed by customers but care should be exercised to differentiate these from adult lingerie. Knickers and pants must provide modesty: thongs are not appropriate for children. Vests and crop tops should also be designed for modesty with no need for structural support in these garments.”

These guidelines also correlate precisely with the BRC regarding first bras for girls. With the earlier physical development of children over the
In the last couple of decades, it is important to offer well designed and supportive first bras to young girls as their breasts develop. Under-wiring is not necessary or appropriate for the smallest cup sizes (e.g., 28AA) designed as a first bra. Seam-free designs are particularly suitable, while giving due regard to cup size and the amount of support needed. First bras should be constructed to provide comfort, modesty, and support but not enhancement. As a guide, the breast shape and contour should not be altered significantly when wearing the bra.

It is the case that parents often express concern about moulded bra cups and where such cups are used to provide structural support, such as for larger cup sizes, retailers may find it helpful to provide their customers with advice to this effect to help allay their concerns. In the main, these products will be in teen ranges, rather than for the Under 12’s.

**Swimwear**

Swimwear should provide for modesty, including when wet, and should be age appropriate with children’s needs specifically in mind.

**Footwear**

In designing footwear for everyday use, the standard approach should be to provide a stable, supporting shoe with a heel pitch (angle of foot) of generally not more than 2.5 cm or one inch. This is particularly the case for younger children and smaller shoe sizes. Retailers should consider the likely use of the shoes, such as school or play, and the necessary support and stability needed.

Although party shoes, intended for occasional and limited wear, may adopt more sophisticated styling, they should still provide adequate stability, avoid excessive heel heights and choice of decoration or embellishment should be ‘pretty’ rather than ‘adult’.

**SIZING AND LABELLING**

Most Irish retailers provide parents with information on the likely age a children’s garment is suitable for rather than its chest, waist or leg measurements.

It is of course the case that the height and weight of children of the same age can vary significantly, which is why it is not uncommon to see retailers offering up to ‘Age 14’ for larger 11 and 12 year olds, for example. Similar considerations apply at any Under 12 range break and retailers may consider it appropriate to offer an overlap in sizes for certain age-specific ranges.

It is appropriate to label garments such as pants, crop tops, knickers, and, usually, swimwear by age for Under 12s.

**Bras**

Unlike other types of clothing and underwear, bras should be labelled by bust and cup size rather than by age. Seam-free bras may be labelled by either method depending on how the product is positioned within the underwear range.

Irish retailers are aware that there has been much criticism and more than a little confusion regarding the use of certain materials and constructions in bras for young girls. This has led to suggestions that these are being used to provide these bras with padding and enhancement. With this in mind, it is helpful to provide descriptions on labels of first bras such as ‘for support and modesty’. As with the BRC code, no mention should be made of ‘enhancement’ or ‘under-wiring’ in any children’s ranges.

**MARKETING**

Responsible Irish retailers do not target their childrenswear marketing at children, but rather at parents, guardians or adult family friends and relatives. This applies to all marketing channels, be they traditional or new media.
While adopting this approach, it is acceptable to use child models within certain parameters. Given the fact that consumption of British media is common in Ireland, it makes sense to follow to the letter the provisions of the BRC code in this area;

- Photography should feature children in natural poses in a childlike environment, appropriate to the age range concerned.
- Where make up is used it should be as natural as possible, ensuring the child’s natural charm comes through in the finished photograph. This does not preclude the use of face paints in a play setting, for example.
- The staging of photographs, like the design of clothing, should encourage children to develop confidence in their bodies without pre-conceptions of ‘more desirable’ body shapes, while supporting the public health agenda regarding child obesity.

Underwear

Underwear should never be modelled on children in marketing material produced by retailers, including on packaging and point of sale material. It is vitally important that websites of retailers do not include images of children modelling underwear.

Placement in store

While floor sizes vary from retailer to retailer, and placement of items can be difficult to manage, retailers should endeavour to ensure that ‘adult only’ merchandise is kept as separate as possible from the childrenswear department. Children’s underwear should be kept within the childrenswear section.

Because of the nature of the garments, and differing physical development of girls approaching teenage years, bras and underwear for this group pose something of a complication. Some product ranges may not necessarily fit into either the children’s section or the adult lingerie department. In this instance, some retailers may be in a position to offer professional measuring and fitting services in women’s lingerie. Careful consideration and internal discussions will be needed to ensure the best approach in general and for a given store.

Online

Particular attention should be paid to retailer’s individual online sites. Digital marketing should observe the same photography and imaging guidelines, considering carefully potential misuse by others. These guidelines state that internet pathways are clear and appropriate for children who may participate in online shopping with their parents. Retailers should aim in the long term to provide website search facilities that provide the same separation of products as is delivered in-store.

INTERNAL COMMUNICATION

Irish retailers should have in place policies that are well understood and embraced by staff, from buyers and designers through to those displaying and selling the goods in store. It is up to individual retailers to properly communicate these guidelines and policies in a way that best suits their own business, but every responsible retailer will have clear internal accountabilities with an individual acting as ultimate guardian of childrenswear standards, responsible to company management.

CUSTOMERS

Irish retailers are responsive to their customers’ wishes and act on feedback from customers, whether through in-store comment, correspondence and website comments, focus groups or insight studies. Responsible retailers give clear signposts on how to raise issues and respond to all types of comments, be they negative or positive.

Retailers should have systems in place to ensure that feedback from customers regarding these guidelines should promptly reach the relevant executive, such as childrenswear, commercial and marketing directors.
PRODUCT WITHDRAWAL

If, in the rare event that a design makes it to production and retailing without adequate measures being taken to ensure that it meets the standard set out in these guidelines, including modesty, age appropriateness or gender/body confidence issues of concern to society, signatories to these guidelines will use feedback from colleagues and customers to re-assess appropriateness. Where the retailer decides that it has not met its usual high standards in this regard, it will act swiftly to withdraw the product from all stores.

REPORTING AND OVERSIGHT

These guidelines will be self-enforcing and customers are encouraged to help in this process. Any customer who believes the guidelines are not being adhered to is requested in the first instance to raise the matter with the manager of the store in question. If the matter is not resolved satisfactorily, the customer should provide his/her feedback centrally to retailer management via the company’s feedback email or telephone lines, all of which are available on the relevant signatories’ websites. Customers are also free, at this point, to provide feedback to retail@ibec.ie and the matter will be brought to the relevant retailer’s attention.

All signatories to these guidelines will meet regularly under the Retail Ireland umbrella to discuss implementation. Any feedback or complaints received by individual retailers will be compiled on a quarterly basis and provided to the Retail Ireland secretariat, which will provide an annual report on progress to the Minister for Children and Youth Affairs.

SIGNATORIES

The following Retail Ireland members are signatories to these guidelines:

- Arnotts
- Brown Thomas
- Clerys Dublin
- Debenhams
- House of Fraser
- Marks & Spencer
- Next
- Penneys
- operated by Primark
- Tesco
- T.K. Maxx