



Policy Template

'Non-Development Activity'

Preface: This policy template has been developed as a tool to assist ACFID's members to develop policy to meet their obligations relating to **Commitment 7.3 of the ACFID Code of Conduct, we are accountable to our stakeholders**. According to Compliance Indicator 7.3.2, member development activities must consistently demonstrate separation of development activities from non-development activities.

All organisations – regardless of whether they undertake or support non-development activity - must have a policy, statement or guidance document that addresses the separation of development and humanitarian activities from non-development activities and this must refer explicitly to both religious and political activity. All organisations must also reflect this separation in their project selection criteria and in their partner MoUs (or similar) to ensure such separation extends to partner organisations.

As outlined in the Compliance verifier at 7.3.2 of the Quality Assurance Framework, any policy, statement or guidance documents should address the separation of development activities from non-development activities in:

- Programming
- Expenditure reporting
- Fundraising
- Advocacy campaigns
- Communications
- Choice for donors
- Partners

These areas will also be governed by other policy or process documents, and the commitments set out in the Non-Development Activity policy should also be reflected in these documents. This will help members to meet the second aspect of Compliance Verifier 7.3.2, which says that members' development initiatives must consistently show evidence of the separation of development and non-development activities.

Members should ensure that any policy that is developed reflects its own organisation's philosophies and principles. The examples contained within this tool are only provided as prompts for signatory organisations to develop a more nuanced policy that best reflects their own approach and practices. It should also be noted that the policy format is provided as an *example* and that this format is not required to meet ACFID Code of Conduct obligations. Signatory organisations should submit a policy in a format that is most appropriate to their own organisation.

Introduction

[The Introduction is a statement that embodies the organisation's commitment to the policy. The statement should describe how the organisation wants to portray itself in relation to undertaking and communicating development and non-development activity.]

Example:

Friends of Cambodia is committed to ensuring that we accurately represent our activities to the people we work with, our donors, and the public.

1. Purpose

[The Purpose should be expressed as a statement that explains why there is a need for this policy. This statement can also include the aims and objectives of the policy. Overall the policy will seek to guide the organisation and its partners to make a clear separation between aid and development and non-aid and development objectives and activities.]

Example:

The purpose of this policy is to guide *Friends of Cambodia* and our partners to make a clear separation between development and humanitarian and non- development objectives and activities. This policy addresses our ACFID compliance obligations when communicating with or soliciting donations from private donors and the public, including fundraising for restricted and unrestricted purposes from aid agencies, sponsors and supporters, and fundraising from the general public.

2. Scope of Policy

[The scope will define the relevant stakeholders to whom the policy relates, which may include staff, board members, consultants and partners. The policy should be distributed to all stakeholders referred to in this 'Scope of the Policy' section]

Example:

This Policy is intended to apply to all *Friends of Cambodia* activities. The policy is applicable to all *Friends of Cambodia* employees and volunteers. The policy also extends to *Friends of Cambodia* partners and associated implementing organisations.

3. Background

[Insert any background information which provides context to the policy - e.g. 'This policy addresses compliance obligations relating to Principle B.1.5 of the ACFID Code of Conduct.' This is also an appropriate place to describe the scope of the organisation's work and its philosophical approach. For organisations that do both non-development and development work, this would be a good place to describe the approach overall.]

Example:

Friends of Cambodia is a faith based agency whose philosophy of development is derived from biblical and theological reflection. Development is understood as a process of transformation that leads to improvement in the whole of human life – materially, socially and spiritually. As part of its compliance with the ACFID Code of Conduct, *Friends of Cambodia* has committed to ensure that funds and other resources designated for the purpose of aid and development will be used only for those purposes and will not be used to promote a particular religious adherence or to support a political party, or to promote a candidate or organisation affiliated to a political party.

or

Development Friends Inc. is a development organisation that promotes social justice and fights poverty by working with communities around the world. It is a secular organisation and does not engage in or support any evangelical activities and is not linked to any political party. In some instances *Development Friends Inc.* partners with local faith-based organisations on the basis that their delivery is without evangelising or making participation conditional on conversion or adherence to a particular religious denomination. It also partners with advocacy organisations from time to time on the basis that their activities are not in support of a political party or candidate.

4. Definition of Aid and Development Activities

[This section will provide definitions of aid and development activities. This definition should be developed to reflect the organisation's own understanding of aid and development. It may be helpful for the organisation to check that its own definition is consistent to the ACFID Code of Conduct definition:

Development and humanitarian initiatives refers to the activities undertaken in order to reduce poverty and address global justice issues. In the non-government organisation sector, this may occur through a range of engagements that include community projects, humanitarian response and emergency management, community education, advocacy, volunteer sending, provision of technical and professional services and resources, environmental protection and restoration, and promotion and protection of human rights.]

Example:

Development Friends Inc. is committed to ensuring that funds and other resources designated for the purpose of aid and development are used only for those purposes. The concept of aid and development activities can be distinguished by the following principles:

- a. Strengths based approaches which encourage people and communities to create solutions for themselves

- b. Processes that seek to address the causes of poverty
- c. Processes that seek to empower rights holders to claim their rights and ensure that duty bearers exercise their duties
- d. Supporting systems and structures which enable people to move out of poverty
- e. Humanitarian response and emergency relief, disaster recovery and meeting the immediate needs of refugees and internally displaced people.

5. Definition of Non-Development Activities

[This section will provide definitions relevant to activities specifically excluded in the definition of aid and development activities, including as a minimum, evangelical activities and partisan political activities.]

Example:

Development Friends Inc. is a secular organisation and does not provide support for evangelical activities and partisan political activities.

Evangelical activities are those activities that promote a particular religious adherence or are undertaken with the intention of converting individuals or groups from one faith and/or denominational affiliation to another.

Partisan political activities are those that are associated with facilitating or supporting specific political party, candidate to gain power or to support organisation affiliated with a political party. This does not include advocacy which is aimed at persuading and influencing decision makers and opinion leaders, and is not aimed at promoting partisan political objectives.

Example:

Friends of Cambodia take a holistic approach to development and this includes support for the spiritual aspects of human transformation. For the purposes of making a distinction between aid and development and non-aid and development activities as required by the ACFID Code of Conduct, any activity whose objectives include the promotion of religious adherence will be considered as a non-aid and development activity and will be managed and accounted for separately.

Friends of Cambodia does not provide support for partisan political activities which are those that are associated with facilitating or supporting specific political individuals to gain power.

6. Compliance

[In this section, refer to compliance obligations such as the ACFID Code of Conduct. Other compliance obligations that relate to tax deductibility or donor funding could also be included in this section.]

Example:

This policy provides a framework for *Friends of Cambodia's* compliance with the Commitment to accountability to our stakeholders in the ACFID Code of Conduct, in particular Compliance Indicator 7.3.2 which states that Members development initiatives constantly demonstrate the separation of development activities from non-development activities.

1.

To be compliant with this indicator, Members are required to have in place:

- Policy, statement or guidance document that addresses the separation of development activities from non-development activities in:
 - Programming.
 - Expenditure reporting.
 - Fundraising.
 - Advocacy campaigns.
 - Communications.
 - Choice for donors.
 - Partners.

- Development initiatives that consistently show evidence of the separation of development and non-development activities.

Members are required to extend this requirement for separation of development and non-development activities to partners through MOUs or similar.

8. Guiding principles

[The guiding principles are the underlying philosophical principles on which the policy is based. This statement expands on the organisation's approach to its work.]

Example:

Friends of Cambodia supports and is committed to abiding by the following principles:

- to ensure accurate representation of our activities to the people we work with, donors and the public
- to ensure that funds raised for aid and development purposes are not used to exploit people and communities who are vulnerable and do not place any conditions or obligations on recipients in terms of non-development, religious or political outcomes that would affect their access to services being offered

Where there are components of partner programs which involve evangelical or partisan political activities, these will be promoted and accounted for separately.

9. Control Procedures

[This section describes the general commitment to implementation of the policy; possibly including an overview of the key controls that organisation will have in place to ensure implementation of the policy.]

Example:

(Signatory name) ensures that we and our partners can differentiate between development and non-development activity and communicate this appropriately to stakeholders, donors and the public.

[The following is a collection of procedures that would assist a signatory to implement this policy and ensure this policy is kept updated as activities and scope may change over time. This list of procedures is not mandatory but is provided as an example of the way a signatory might approach policy implementation.]

Separation of and development and humanitarian and non-development in programs and projects

Procedures:
<ol style="list-style-type: none">1. Members will appraise all project proposals to determine whether they include non-aid and development components.2. Appraisers will record any issues, which must then be followed up to ensure that the policy requirements are satisfied before the project is approved.3. Appraisers record any aspects of the project that should be closely monitored over the life of the project to ensure compliance with this policy.4. Partner capacity assessment processes require the signatory to identify whether the partner is engaged in non-development activities, and if so, how it is able to manage and account for them separately to aid and development activity.5. Components of projects that represent non-development activity will be managed, reported and accounted for separately to aid and development components.6. In-country project monitoring will include monitoring of the separation of non-development activities from development and humanitarian activities as part of project monitoring, learning and evaluation processes.

Separation and development and humanitarian and non-development in communications – including advocacy materials.

Procedures:
<ol style="list-style-type: none">1. Guidelines are in place that address appropriate reporting in organisational promotional materials.

2. All articles written by overseas project partners or photos supplied by partners for reporting materials are reviewed for differentiation between development and humanitarian and non-development activities.
3. Communications materials are reviewed prior to publication to ensure separation of reporting and fundraising for development and humanitarian and non-development activities.

Separation of development and humanitarian and non-development in fundraising and provision of choice for donors.

Procedures:

1. Fundraising materials will be reviewed prior to publication to ensure that solicitations make a clear distinction between aid and development and non-development activities.
2. Where fundraising solicitations include references to both development and humanitarian and non-development activities, they will be reviewed to ensure that donors are provided with the choice of contributing to aid and development activity only.
3. Funds raised non-development activity will be tracked, managed, reported and accounted for separately to those raised for development and humanitarian components.

Extending the separation of development and humanitarian and non-development activities to partners

Procedures:

1. Communication with new partners will state the Member's position on support for non-development activity.
2. Member's partners will receive a copy of this policy.
3. The partner agreement Memorandum of Understanding (MoU) or equivalent will include clear definitions of development and humanitarian activity and non-development activity.
4. The partner agreement (MoU or equivalent) will require the partner to agree that the Members funds designated for development and humanitarian purposes will not be used to fund any non-development activity.

5. Ongoing dialogue between the Member and its partners will reinforce the definitions of development and humanitarian and non-development activity and the need for a separation between development and humanitarian and non-development activity.

Policy Implementation and Review

Procedures:
1. The signatory will review this policy on a regular basis, at least every two years.
2. Confirmation of internal compliance with this policy will be undertaken at least once annually.
3. Introduction of the policy will be included in the induction process, to be read by all new staff.
4. A workshop will be regularly organised to present the policy to staff and keep them updated on any changes.

10. Resources

[This section refers to any key resources relevant to this policy. It may include, for example, the organisation's development philosophy or other policies that relate to this policy. It may include reference to other documents or guidelines that impact on this policy, such as donor requirements.]

Example:

ACFID Code of Conduct and Good Practice Toolkit for Compliance Indicator 7.3.2

Member's Development Philosophy

Member's communication policy

Member's partner guidelines

Member's monitoring, evaluation and learning guidelines.

AusAID OAGDS Guidelines

ACFID Code of Conduct: Definitions