POLICY G006: NON-DEVELOPMENT ACTIVITY POLICY

Responsible person:	CEO	Version:	2.2
Approved by Board of Directors on:	27 February 2019	Scheduled review date:	February 2027

PREAMBLE

This policy was written by So They Can (Australian Entity) for use across all So They Can offices. So They Can operates five offices registered in each of Australia, Kenya, Tanzania, New Zealand and USA, which are part of the So They Can Global Alliance. In this policy, 'CEO' means CEO of So They Can (Australian Entity). Unless specified otherwise the 'Board' refers to the board of So They Can (Australian Entity). This policy is intended for all So They Can staff, Board members and volunteers, in all 5 So They Can offices. So They Can procedures are consistent with So They Can policies.

DEFINITIONS

Aid and Development Activities means activities undertaken in order to reduce poverty and address issues of global justice through community projects and education, emergency management, advocacy, volunteering, the provision of technical and professional services and/or resources, environmental protection and/or restoration, and promotion and protection of human rights.
The concept of aid and development activities can be distinguished by the following principles:

- Strengths based approaches which encourage people and communities to create solutions for themselves
- Processes that seek to address the causes of poverty
- Processes that seek to empower rights holders to claim their rights and ensure that duty bearers exercise their duties
- Supporting systems and structures which enable people to move out of poverty
- Emergency relief, disaster recovery and meeting the immediate needs of refugees and internally displaced people.

Non-Development Activities means activities that are not Aid and Development Activities. It includes welfare, evangelical and partisan political activities.

Welfare activities are defined as care and maintenance, other than in refugee and emergency situations, which aims to maintain people in a particular condition on a longer-term basis. Substantial and broad impact on social and economic conditions in the community is not normally expected from welfare programs. Welfare may be provided to an individual or family basis including home-based and institutional care programs, such as those provided by orphanages, homes for the elderly, hospices and the provision of food for those who are destitute. Welfare activities are typically:
• implemented independently of other sustainable community development activities;
• include no strategy for integration into broader community development programs;
• provided on an individual or family basis, rather than on a community basis, and are unconnected to emergency needs; and
• implemented on a long term basis with no clear exit strategy.

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 or candidate in a local, regional or general / national election o or facilitating or supporting a particular politician or faction to gain power within a government or political party structure.

POLICY

This policy provides a framework for So They Can's compliance with the Commitment to accountability to our stakeholders in the ACFID Code of Conduct in particular Compliance Indicator 7.3.2 that states that Member's development activities constantly demonstrate the separation of development and non-development activities.

So They Can is committed to ensuring that funds and other resources designated for the purpose of aid and development are used only for those purposes. The distinction between funds and/or resources used for aid and development activities and non-development activities will be maintained at all times including in all fundraising, programming, communications, reporting and relationship management with So They Can donors and partners.

PRINCIPLES

So They Can 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.
- 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.

PROCEDURES

So They Can ensures that we and our partners can at all times differentiate between development and non-development activity and communicate this appropriately to stakeholders, donors and the public.

1. Separation of aid and development and non-development in So They Can programs and projects:
    - So They Can will appraise all project proposals to determine whether they include non-aid and development components.
    - Appraisers will record any issues, which must then be followed up to ensure that requirements of this policy are satisfied before the project is approved.
    - Appraisers record any aspects of the project that should be closely monitored over the life of the project to ensure compliance with this policy.
    - As part of partner capacity assessment So They Can identifies whether a 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.
    - Components of projects that represent non-development activity will be managed, reported and accounted for separately to aid and development components
    - In-country project monitoring will include, where relevant, monitoring of the separation of non-development activities from aid and development activities

2. Separation of aid and development and non-development in So They Can communications:
   - All organisational promotional materials report separately on development and non-development activities.
   - All articles written by overseas project partners or photos supplied by partners for So They Can reporting materials are reviewed for differentiation between development and non-development activities.
   - All communications materials are reviewed prior to publication to ensure separation of reporting and fundraising for aid and development and non-development activities.

3. Separation of aid and development and non-development in fundraising and provision of choice for So They Can donors:
   - So They Can fundraising materials are reviewed prior to publication to ensure that solicitations make a clear distinction between aid and development and non-development activities.
   - Where fundraising solicitations include references to both aid and development 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.
   - Funds raised non-development activity will be tracked, managed, reported and accounted for separately to those raised for development and humanitarian components.

4. Extending the separation of aid and development and non-development activities to So They Can partners:
   - Communication with new partners will state So They Can's position on support for non-development activity.
   - So They Can's partners will receive a copy of this policy.
   - Agreements with all So They Can partners will include clear definitions of aid and development activity and non-development activity.
   - The partner agreement will require the partner to agree that So They Can's funds designated for aid and development purposes will not be used to fund any non-development activity.
   - Ongoing dialogue between So They Can and its partners will reinforce the definitions of development and non-development activity and the need for a separation between development and non-development activity.

RELATED DOCUMENTS

- All So They Can Policies
- So They Can Policy and Manual Register
- ACFID Code of Conduct and Good Practice Toolkit for Compliance Indicator 7.3.2

Date	Version	Comment
October 2013	1.0	
27 February 2019	2.0	Review of the policy in line with DFAT requirements
December 2019	2.1	Details added into section 4 of procedures relating to partnerships
May 2021	2.1	Regular policy review
February 2023	2.1	Regular policy review
April 2024	2.2	Aligned Welfare definition with

		DFAT's