



**EDUCATING  
THE FUTURE**

## **Non-Development Policy**

### **Status Information**

#### **Currency of Version**

Version 1: 11/06/2019

Version 2: 13/07/2021

# Non-Development Policy

Policy number:	18	Version:	2 (5/09/21)
Drafted by:	Finance, Audit and Risk Committee	Approved by Governance Committee on:	11/06/2019 (updated on 13 September 2021)
Responsible person:	Board of Management	Scheduled review date	11/06/2021

## 1. Introduction

**1.1 Educating The Future Australia (ETF) Limited** is committed to pursuing our development activities in line with best practises and ensuring that we accurately represent our activities to the people we work with, our donors, and the general public.

Educating the Future’s Non-Development Policy is guided and informed by:

- Australia Council for International Development (ACFID) Code of Conduct and Quality Assurance Framework;
- Australian Department of Foreign Affairs and Trade’s (DFAT) Code of Conduct and Guidelines.

## 2. Purpose

The purpose of this policy is to guide ETF and our partners to make a clear separation between development and humanitarian and non-development activities.

This policy addresses Australian Council for International Development (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.

### **3. Scope of policy**

This policy is intended to apply to all ETF activities. The policy is applicable to all ETF Directors and Volunteers. This policy will be extended to ETF partners and associated implementing organisations.

### **4. ETF Development Activities**

ETF is a not-for-profit organisation that aims to provide access to education to those in need through the funding of the construction of preschools in Timor-Leste. ETF 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, ETF may partner 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. ETF may partner with Government agencies both domestically and internationally to help deliver preschool infrastructure on the basis that their activities are not in support of a political party, specific candidate and/or agenda.

### **5. Definitions**

#### **Aid and Development Activity**

ETF 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 that 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) Involves rights holders to the maximum extent possible in the design, implementation and evaluation of projects and programs;
- f) Respects and forster internationally recognised human rights, both socio-economic and civil-political;
- g) Is based on an understanding of the history and culture of the affected communities;

## **Non Development Activity**

Educating the Future defines Non-Development Activity inline with the ACFID Code of Conduct to mean:

- 'Includes activities undertaken to promote a particular religious adherence or to support a particular party, candidate or organisation affiliate to a political party'

## **Evangelical 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**

Partisan political activities are those that are associated with facilitating or supporting a specific political party, a 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.

## **Recognised Development Expenditure (RDE)**

Recognised Development Expenditure (RDE) is the annual eligible expenditure of a Non-Government Organisation (NGO) using contributions from the Australian community. Eligible expenditure is for the NGO's own development assistance, emergency relief or rehabilitation activities overseas and development education in Australia.

Eligible contributions include, donations of cash, gifts-in-kind and volunteer services.

- Up to half of the RDE can be used from eligible gifts-in-kind and/or eligible volunteer services.

A timesheet system should be used to capture volunteer hours towards overseas development activities.

## **6. Policy Statement**

ETF is a secular organisation and does not provide support for non-development activities, including evangelical activities and partisan political activities.

Educating The Future is committed to ensuring that funds and other resources designated for the purpose of aid and development are used only for those purposes.

Educating The Future will have a clear separation between aid and development and non-development objectives and activities. This separation will be clear in all fundraising, program designs, and related activities in public communication and in all reporting.

Should there be any components of partner organisation which involve evangelical or partisan political activities, these will be isolated and accounted for separately.

Non Development activities are not considered to be RDE, nor acceptable for receipt of funding derived from Tax Deductible Gifts.

## **7. Compliance**

This policy provides a framework for ETF's compliance with the commitment to accountability to our stakeholders, ETF's development initiatives should constantly demonstrate the separation of development activities from non-development activities.

Organisations are required to have in place:

- Policy, statement or guidance document that addresses the separation of development activities from non-development activities in:
  - Program reporting
  - Expenditure reporting
  - Fundraising
  - Advocacy campaigns
  - Communications
  - Partners
  
- Development initiatives that consistently show evidence of the separation of development and non-development activities.

## **8. Guiding principles**

ETF supports and is committed to abiding by the following principles:

- To ensure an 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**

The Programs Committee will ensure that ETF and its partners can differentiate between development and non-development activity and communicate this appropriately to stakeholders, donors and the public.

### **9.1 Separation of and development and humanitarian and non-development in programs and projects**

Procedures:

- 1) The ETF programs team 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 programs team 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.

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

Procedures:

- 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.

### **9.3 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.

### **9.4 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) ETF will send partners 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.

## **10. Policy Review**

10.1. This policy shall be disseminated through an appropriate directive to all internal ETF stakeholders and necessary persons.

10.2. Development and non-development activities will be monitored on a regular basis, and ETF will communicate and consult with relevant stakeholders regarding our approach to or the introduction of non-development activities.

10.3. This policy will be reviewed every two years