

## NON-DEVELOPMENT ACTIVITY POLICY

Policy number:	2.16	Version:	2024 V4
Responsible Person:	Global Division Director	Approval date:	August 2024

### INTRODUCTION

This policy provides guidelines on the Organisation's aid and development and non-aid and development objectives and activities. ASHM is committed to ensuring that we accurately represent our activities to the people we work and our stakeholders.

### PURPOSE

This policy reflects accountability to all stakeholders, building trusting relationships with communities and honesty & transparency.

The purpose of this policy is to guide ASHM and our partners to make a clear separation between development objectives and activities 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 public.

The purpose of this policy is to ensure that ASHM clearly distinguishes between development and non-development activities. This distinction is crucial for maintaining transparency and accountability in our use of funds, which are intended solely for development purposes. The policy helps to ensure that resources designated for aid and development are not used for activities such as promoting religious adherence, supporting partisan political activities, or engaging in welfare activities that do not contribute to sustainable development outcomes. By implementing such a policy, ASHM can demonstrate compliance with DFAT's funding requirements and the ACFID Code of Conduct, thereby safeguarding our eligibility for continued funding.

### SCOPE

This policy applies to all ASHM activities and is applicable to all ASHM staff and stakeholders.

### DEFINITIONS

**Aid and development:** The Australian Council for International Development (ACFID) defines aid and development as follows:

- **Aid** refers to assistance provided to help improve the quality of life of people, particularly those in need, often in the form of financial support, technical expertise, or resources.
- **Development** is a broader process that involves efforts to improve the economic, social, and political conditions of communities or countries. This includes initiatives aimed at reducing poverty, enhancing education, improving health, and fostering sustainable growth.

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## POLICY

ASHM is dedicated to ensuring that funds and resources allocated for aid and development are used solely for these intended purposes. Our approach is rooted in the human rights principles of "do no harm" and the promotion of well-being. We emphasize value for money, accountability, transparency, effectiveness, partnerships, and locally led initiatives. Our development efforts are aligned with the ACFID definition of aid and development as well as the OECD definition.

ASHM uses funds and resources designated for aid and development which are allocated to activities that promote sustainable health services, enhance health workforces, and strengthen health systems. These activities include building local capacity to deliver health services effectively and supporting the organisational strengthening of local NGOs and government departments within sectors such as HIV, sexual and reproductive health and rights, and blood-borne viruses.

This policy aligns with the Department of Foreign Affairs and Trade's (DFAT) standards and guidelines, which includes adhering to DFAT's requirements on accountability, transparency, and governance and adhering to any specific instructions or restrictions imposed by DFAT on the use of funds.

### **Separation of Activities**

ASHM ensures that non-development activities are distinctly separated from development activities in all aspects, including programming, expenditure reporting, fundraising, advocacy campaigns, communications, and partnerships.

### **Fund Management**

ASHM has implemented procedures to ensure that funds designated for development activities are not used for non-development purposes. This includes maintaining financial records for each type of activity.

### **Communication and Fundraising:**

ASHM ensures that communications and fundraising materials clearly differentiate between development and non-development activities. Donors are informed and given the choice to contribute specifically to development activities.

### **Monitoring and Reporting**

ASHM has established mechanisms for monitoring and reporting to ensure compliance with this policy. This includes regular audits and reviews to verify that funds and resources are used appropriately.

### **Partner Engagement:**

ASHM communicates this policy to all partners and ensures that they understand the distinction between development and non-development activities. Partner agreements should include clauses that require adherence to these principles.

### **Policy Review and Compliance:**

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ASHM regularly reviews this policy (every three years) to ensure it remains effective and compliant with DFAT requirements. This includes incorporating any updates to DFAT or ACFID guidelines.

ASHM does not invest in Non-Development Activities: as defined by the ACFID Code of Conduct refer to activities that do not align with the objectives of aid and development. These activities include:

- **Evangelical Activities:** these are activities that promote a particular religious adherence or are undertaken with the intention of converting individuals or groups from one faith or denominational affiliation to another.
- **Partisan Political Activities:** these are activities that support a specific political party, candidate, or organization affiliated with a political party. This does not include advocacy aimed at influencing decision-makers and opinion leaders without promoting partisan political objectives.
- **Welfare Activities:** Long-term care and maintenance activities that aim to maintain people in a particular condition without substantial impact on social or economic conditions. These activities are typically implemented independently of sustainable community development activities and include no strategy for integration into broader community development programs.
- Provide medical or clinical services without:
  - established clinical governance arrangements for managing clinical risk and ensuring best practice standards.
  - medical liability insurance or equivalent in place; and
  - appropriate approval from the host country.
- Primarily for the provision of assets

This policy establishes a framework for ASHM's compliance with the ACFID Code of Conduct's commitment to accountability to stakeholders, particularly Compliance Indicator 7.3.2, which mandates that ACFID members consistently demonstrate the separation of development activities from non-development activities.

## RELATED POLICIES

- 2.08 Industry Sponsorship
- 2.13 Code of Conduct
- 2.19 Welfare, Evangelism & Political Activities
- 9.01 Global Program Policy

## AUTHORISATION

CEO

## HISTORY

Version	Approved Date	Comments/ Amendments
2018v1	21-06-2018	First version of this policy

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<b>2021v3</b>	26-08-2021	Tri-annual compliance review. New template.
<b>2024 V4</b>	Aug 2024	Review and updated to reflect commitment to DFAT ANCP requirements

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## NON-DEVELOPMENT ACTIVITY PROCEDURE

Procedures number	2.16	Version:	2021V3
Responsible person	Global Division Director	Approval date:	26-08-2021

### RESPONSIBILITIES

The CEO, Division and Program managers are responsible for applying this policy to ASHM collaborations and partnerships related to development project proposals and contracts.

### PROCEDURES

This procedure ensures that ASHM is accurately representing its activities to members, sector partners & collaborators and other external stakeholders.

These procedures are in line with the ACFID Non-Development Activity Policy, DFAT ANCP compliance requirements and ASHM's mission and international development approach

- ASHM Staff will only build into project designs activities which align with this policy.
- ASHM will appraise activities proposed by implementing partners to ensure they comply with this policy i.e. only support development as defined in the policy.
- ASHM will not fund implementing partners to undertake non development activities including but not limited to activities that directly promote a particular religion, political party or fund welfare.
- Any activities which raise a concern will be monitored and included in the project riskregister.
- Partner capacity assessment processes require the signatory to identify whether the partner is engaged in non-development activities, and if so, how it can manage and account for them separately to aid and development activity.
- Project partner and funding agreements include a clause stating that non development activities will not be funded or engaged in. This policy is to be shared with implementing partners, clarified and discussed as needed.
- Financial acquittals provided by implementing partners will be cross checked by program managers to ensure non-development activities have not been funded and will raise any issues that arise with the partners.

### RELATED DOCUMENTS AND FORMS

ACFID Non-Development Activity Policy Template

DFAT ANCP Manual

### AUTHORISATION

ASHM CEO

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