

NON-DEVELOPMENT ACTIVITIES POLICY

September 2021

INTRODUCTION

Opportunity International Australia (Opportunity) supports aid and development activities in order to reduce poverty by addressing its causes. Opportunity is committed to ensuring that funds and other resources designated for the purpose of aid and development are used only for those purposes. Opportunity is committed to providing opportunities for people in poverty to transform their lives without regard to religious or political affiliation.

PURPOSE

The purpose of the Non-Development Activities Policy (Policy) is to guide Opportunity and our partners to make a clear separation between aid and development and non-development objectives and activities. This policy addresses Opportunity's obligations to accurately represent our activities within our programs and expenditure reporting, to the people we work with, and 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.

SCOPE OF POLICY

This Policy applies to all Opportunity activities, including our programs, expenditure reporting, communications, fundraising and campaigns. The Policy is applicable to all Opportunity's employees and volunteers. Opportunity must ensure that this Policy is applied by Opportunity's implementing partners.

BACKGROUND

Opportunity is a faith-based development organisation that supports local microfinance institutions (MFIs) which provide innovative financial solutions, small business loans and training to predominantly low-income women, in order to support microentrepreneurs, support small businesses, and build vibrant communities. It also supports organisations that provide community development services such as improved access to healthcare and quality education. Motivated by Jesus Christ's call to serve the poor without regard to ethnicity, gender or religious or political affiliation, we seek to emulate the Good Samaritan, whose compassion and action crossed ethnic groups and religions.

Opportunity does not provide funding or other resources for welfare or religious activities, nor does it believe it is appropriate to link religious activities with the provision of programs. Opportunity is not linked to any political party. Opportunity is also committed to ensuring 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 for religious activities, to support a political party, or to promote a candidate or organisation affiliated to a political party.

DEFINITION OF AID AND DEVELOPMENT ACTIVITIES

Aid is defined in ACFID's Code of Conduct (CoC) as 'activities undertaken in order to reduce poverty and address global justice issues... through a range of engagements that includes 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.'

The ACFID CoC defines Development as 'improving the conditions of communities in a sustainable way. It is based on working with communities, rather than for or on behalf of communities.'

In alignment with ACFID's definitions of Aid and Development, Opportunity's activities seek to address the causes of poverty through working with local in-country partners – supporting systems and structures which enable people to move out of poverty. For example, through the provision of financial and non-financial services, including health education and women's empowerment services, to people living in poverty, they can transform their lives, their children's futures and their communities in a sustainable way.

DEFINITION OF NON-DEVELOPMENT ACTIVITIES

Non-development activities include welfare, partisan politics, and religious activities. From the Department of Foreign Affairs (DFAT) Accreditation Guidance Manual, Opportunity accepts the following definitions relevant to non-development activities:

Religious Activities

Religious Activities are those that promote or support a particular religion, including activities undertaken with the intention of converting individuals or groups from one faith and/or denomination to another. Religious activities also include those that build up religious structures (including infrastructure, training or organisational activities), unless those structures are specifically designed to provide non-denominational development outcomes.

Welfare

Welfare is assistance to maintain individuals in a particular condition on a long-term basis, such as institutionalised care programs provided by orphanages, child sponsorship (that is, funds given directly to children or their families, and not funds drawn from child sponsorship and used for development purposes), hospital care programs, hospices, and costs for the maintenance of structures for institutionalised care programs (for example, schools or orphanages). Other features of welfare include:

- Welfare is implemented independently of other sustainable community development activities.
- Welfare includes no strategy for integration into a broader community development program.
- Welfare is provided on an individual or family basis, rather than on a community basis, and is unconnected to emergency needs.
- Welfare activities are implemented on a long-term basis with no clear exit strategy.

Partisan political purposes

Partisan political purposes are those with the intention of facilitating or supporting a specific political party, candidate or organisation affiliated to a political party in a local, regional or general/national election; facilitating or supporting independence or separatist movements; or facilitating or supporting a particular politician or faction to gain power within a government or political party structure.

COMPLIANCE

This policy provides the framework for Opportunity's compliance with the ACFID Code of Conduct and as an accredited organisation with the Australian Government. Opportunity's approach to the separation of development and non-development activities is covered by the following four commitments:

1. Opportunity will have a clear separation between aid and development and non-development objectives and activities based on the definitions of aid and development and non-development as laid out above.
2. This separation will be clear in all fundraising, programs and other activities, in public communications and in all reporting including annual reports and expenditure reporting.
3. Any fundraising solicitations that include references to both aid and development and non-development activities will provide donors with the choice of contributing to aid and development activities only.
4. Opportunity will ensure that any such separation in fundraising, programs and other activities, in public communications and in reporting, extends to partner and implementing organisations and is documented.

GUIDING PRINCIPLES

Opportunity is committed to ensuring that:

- funds and other resources designated for the purpose of aid and development are used only for those purposes and not for non-development activities, such as welfare, religious activities or partisan politics.
- access to services and programs is not conditional on religious or political affiliations of the beneficiaries.
- in the event that components of partner programs involve religious activities, welfare or partisan political activities, these will be promoted and accounted for separately.

CONTROL PROCEDURES

Opportunity ensures that it and its partners can differentiate between development and non-development activities and communicate this appropriately to stakeholders, donors and the public.

As a signatory to ACFID's Code of Conduct and recipient of Australian Government funding, Opportunity will meet the requirements of the ACFID Code of Conduct and Australian NGO Cooperation Program through the following procedures:

- 1:** Opportunity will have a clear separation between aid and development and non-development objectives and activities based on the definitions of aid and development and non-development as laid out above.

Procedures:

- Opportunity will appraise project proposals to determine whether they include non-development components, as an integral part of our due diligence activities.
- Components of projects that represent non-development activities will be managed, reported and accounted for separately to aid and development components, including in expenditure reporting.
- Project monitoring will include ongoing, regular monitoring and reporting of the separation of non-development activities from aid and development activities.

- 2:** For projects that include non-development components, the separation will be clear in all fundraising, programs and other activities, in public communications and in all reporting including annual reports.

Procedures:

- Guidelines are in place that address appropriate reporting in organisational promotional materials.
- All articles written by overseas project partners or photos supplied by partners for reporting materials are reviewed for differentiation between development and non-development activities.
- Communications materials are reviewed prior to publication to ensure separation of reporting and fundraising for aid and development and non-development activities.

- 3:** Any fundraising solicitations that include references to both aid and development and non-development activities will provide donors with the choice of contributing to aid and development activities only.

Procedures:

- Fundraising materials will be reviewed prior to publication to ensure that solicitations make a clear distinction between aid and development and non-development activities.

- 4:** Opportunity will ensure that any such separation in fundraising, programs and other activities, in public communications and in reporting, extends to program partners and implementing organisations and is documented.

Procedures:

- Communication with new program partners will state Opportunity's position on support for non-development activities.
- Relationship Agreements (MoU or equivalent) will include clear definitions of aid and development activities and non-development activities.
- The Relationship Agreements (MoU or equivalent) will require the partner to agree that financial or other support provided by Opportunity will not to be used for non-development activities, including welfare, religious activities, and partisan

politics, unless otherwise agreed by Opportunity in writing prior to the financial or other support being provided.

- The Relationship Agreements (MoU or equivalent) will require partners who undertake any non-development activities to make a clear separation of development activities and non-development activities in all related program, expenditure reporting, fundraising, advocacy campaigns, public communications and reporting.
- The partner systems self-assessment establishes that Opportunity's partners have the 'necessary and sufficient' financial systems and internal controls in place to mitigate risks and meet the terms and conditions of the Relationship Agreement.

RESOURCES

The following resources and processes are used to ensure that Opportunity and our partners can differentiate between aid and development and non-development activities and communicate this appropriately to stakeholders, supporters and the public.

- ACFID Code of Conduct
- DFAT Accreditation Guidance Manual
- Opportunity Communications Manual, approval process, and checklist
- Project Appraisal and acquittal process
- Relationship Agreement
- Partner Compliance and Social Inclusion Guidance Manual

POLICY IMPLEMENTATION AND REVIEW

Opportunity will review this policy on a regular basis, at least every five years. Training on the policy will be provided to staff as part of Opportunity's regular staff training program.