

NON-DEVELOPMENT ACTIVITY POLICY



1. Scope

At Sight For All we are accountable to our stakeholders and as such we are committed to ensuring that we accurately represent our activities to the people we work with, our donors and the public.

Sight For All is not a religion-based organisation, nor is it associated with any organised religion. Sight For All does not align itself with any political party in Australia or other countries.

This Non-Development Activity Policy provides guidance to Sight For All, our supporters, funders and implementing partners, to make a clear separation between development and non-development activities.

This policy addresses Sight For All's ACFID compliance obligations when communicating or soliciting donations from private donors and the public, including fundraising for restricted and un-restricted purposes from aid agencies, sponsors and supporters and fundraising from the general public. It provides the framework to ensure Sight For All's development approach and philosophy aligns with the ACFID Code of Conduct and Australian Aid Program.

This policy applies to all Sight For All Directors, staff, Visionaries, volunteers and project participants. The policy also extends to Sight For All partners and implementing partners.

2. Background

Sight For All is 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 to promote a particular religious adherence, to support a political party, or to promote a candidate or organisation affiliated to a political party.

Sight For All's projects are focused on addressing all causes of blindness through four key strategies; Collaborative Research, Sustainable Education, Infrastructure Support and Eye Health Awareness. All projects are undertaken as part of an Initiative (Program). There are nine initiatives in total, covering ophthalmic sub-specialty areas and optometry.

Sight For All 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 by Sight For All can be distinguished by the following principles:

- a) Strengths based approaches which encourage people 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, or refugees and internally displaced people.

3. Definition

Sight For All uses definitions as outlined in the [DFAT ANCP Manual \(2024\)](#). This includes:

Development Initiatives

Sight For All is guided by ACFID's definition of development initiatives:

"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 education, advocacy, volunteer spending, provision of technical and professional services and resources, environmental protection and restoration, and promotion and protection of human rights."

Political Activities

Defined as supporting a specific political party, candidate or organisation affiliated to a political party. An example is an ANGO's staff being invoiced in party political activities or the use of funds and/or resources to facilitate or support a specific political party or candidate.

Political Statements

Sight For All is not a political organisation, and as such does not take a position on political matters. With this in mind, Board Directors, Staff, Visionaries or Volunteers are not to make a political statement on behalf of Sight For All. Further clarification about this is required to be sought by contacting the Chair.

Religious Activities

Defined as supporting or promoting a particular religion, including activities undertaken with the intention of converting individuals or groups from one faith and/or denomination to another.

Welfare Activities

In understanding the difference between aid and development and welfare activities, Sight For All has referenced DFAT's ANCP Guidance Manual. With regards to welfare activities, this manual states:

"Welfare is defined as care and maintenance that aim 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."

4. Sight For All Activities

Sight For All defines partners as organisations with whom an agreement is in place to undertake a project eg: Ministry of Health, hospitals and regional/secondary/provincial eye units.

Sight For All takes due care during project identification, design and implementation to ensure that funds and resources are used only for the purpose for which they are intended. Sight For All adopts the following strategies to assist in ensuring this:

- Project appraisals conducted prior to the commencement of projects to identify any issues
- Partnership and Capacity Assessments undertaken for all projects
- Project and financial management undertaken during the project cycle through Operations and Research Committee meetings and regular Finance, Risk, Remuneration, Audit and Compliance Committee meetings
- Project monitoring via Project Team Meetings and Operations and Research Committee meetings.

Sight For All has a Partner Engagement and Collaboration Policy which assists in ensuring new partners and implementing partners are carefully selected prior to projects commencing. In most cases, Sight For All has a long history with partners who are largely government-based organisations.

5. Compliance

This policy provides a framework for Sight For All'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 from nondevelopment activities and Commitment 8.2 'We ensure the funds and resources entrusted to us are properly controlled and managed'.

6. Guiding Principles

Sight For All 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.

Board Directors, staff or Visionaries with an affiliation to a particular political party understand that they must declare a conflict of interest should that affiliation affect their involvement with Sight For All.

7. Control Procedures

Sight For All ensures that our Board, staff, Visionaries, volunteers, Fellows, and partners can differentiate between development and non-aid development activity and communicate this appropriately to stakeholders, donors and the public. This is achieved in the following ways:

- this policy is distributed to Board Directors, staff and volunteers, including Visionaries to ensure they have a clear understanding of the difference between aid and development activities and non-aid and development activities
- this policy is distributed to partners via Country/Project Officers, and as an attachment to Project Agreements
- Sight For All projects are appraised in line with the 'Project Design and Appraisal Procedure' to ensure they do not include non-development activities
- new partners to Sight For All are engaged based on the 'Partner Engagement and Collaboration Policy'
- project and financial management is undertaken throughout the project cycle via monthly operations meetings and regular Finance, Risk, Audit and Compliance Committee meetings
- projects are monitored via communication with Fellows, project participants and heads of eye units and through Visionary reports
- in soliciting donations and developing fundraising campaigns, Sight For All Board Directors, staff and Committee members will follow the guiding principles outlined in the Sight For All Fundraising Policy
- where funds raised by major events are done so for particular projects, this is communicated in promotional material in the lead up to the event, in post-event communications and via newsletters
- newsletters to partner countries, Vision Givers and Visionaries include detail about how projects have been funded
- communication materials are reviewed in line with the Ethical Communications Policy
- Sight For all does not engage in any non-aid and development activities and as such there is no promotion undertaken to that effect
- new staff and Board Directors are provided with a copy of the policy
- Sight For All staff and Board Directors engaged in activity in-country will liaise with eye unit heads/hospital Directors, Country/Project Officers during in-country visits or when in Australia.

8. Related Documents

- Sight For All Constitution
- Sight For All Partner Engagement and Collaboration Policy
- Sight For All Partnership and Capacity Assessment Template
- Sight For All Project Appraisal Template
- Sight For All Ethical Communications Policy
- Sight For All Project Identification, Design and Appraisal Procedure
- Sight For All Fundraising Policy
- ACFID Code of Conduct
- ACFID Policy Template 'Non-Development Activity'
- DFAT ANCP Guidance Manual
- DFAT OADGS Guidelines

9. Policy Inclusion

The March 2025 review of this Non-Development Activity Policy incorporated the Sight For All Welfare, Evangelism and Political Activities Policy.

10. Review

The Sight For All Non-Development Activity Policy is reviewed on a biennial basis.

Sight For All Non-Development Activity Policy April 2025

Approved by the Board of Directors 15 April 2025

Version 9

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