

# Non-Development Activity Policy



## 1. Scope

Sight For All is accountable to our stakeholders and as such is 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 unrestricted 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 4 key strategies; Collaborative Research, Sustainable Education, Infrastructure Support and Eye Health Awareness. All projects are undertaken as part of an Initiative (Program). There are 9 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.

## 4. Definition

### Aid and Development

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

"Development and humanitarian initiatives refers to the 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 promotion and protection of human rights.”

### 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, other than in refugee or 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.”

### **5. Definition of Non-Aid Development Activities**

Sight For All is a secular organisation and does not provide support for evangelical activities and partisan political activities.

In understanding non-aid and development activity, Sight For All refers to the definition used by ACFID:

“Non-Aid and Development Activity: Includes activity undertaken to promote a particular religious adherence or to support a political party, candidate or organisation affiliated to a particular party.”

Evangelical activities are those 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 individuals to gain power. 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.

### **6. Sight For All Activities**

Sight For All defines partners as organisations with whom an agreement is in place to undertake a project eg: MoH. hospitals, regional/secondary/provincial eye units where projects are undertaken. 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 monthly operations meetings and regular Finance, Risk, Audit and Compliance Committee meetings
- Project monitoring via fortnightly Program Management Committee and monthly Operations 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.

### **7. 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 non-development activities.

## 8. 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.

## 9. Control Procedures

Sight For All ensures that our Board, staff, Visionaries, volunteers, Ophthalmic Country Officers, 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 Officers, Ophthalmic Country 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' and following completion of a Fiduciary Assessment of Implementing Partners Form
- 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
- 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 1000 Members and Visionaries include detail about how projects have been funded
- communication materials are reviewed in line with the Published Material Quality Assurance Procedure
- 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 Officers and Ophthalmic Country Officers during in-country visits or when Ophthalmic Country Officers are in Australia.

## 10. Related Documents

- Sight For All Constitution
- Sight For All Fiduciary Assessment of Implementing Partner Template
- 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 Published Material Quality Assurance Procedure
- Sight For All Project Identification, Design and Appraisal Procedure

- ACFID Code of Conduct
- ACFID Policy Template 'Non-Development Activity'
- DFAT ANCP Guidance Manual
- DFAT OADGS Guidelines

### 11. Review

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

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Approved by the Board of Directors 16 November 2021

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