MAA INTERNATIONAL

NON-DEVELOPMENT ACTIVITY POLICY

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1 INTRODUCTION

MAA International (MAA) is registered with the Australian Charities & Not-for-profits Commission (ACNC). This registration and associated ACNC Tick of Charity Registration (the Registered Charity Tick) aims to gives reassurance to the public that the charity is transparent and accountable by highlighting its presence on the ACNC Charity Register.

MAA is also a signatory and a full member of the Australian Council for International Development (ACFID) Code of Conduct, which requires high standards of corporate governance, public accountability and financial management to be in place. The ACFID Code of Conduct requires members to ensure 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 or to support a political party, or to promote a candidate or organisation affiliated to a particular party*' .

In addition, MAA has also attained its base accreditation with DFAT (The Department of Foreign Affairs and Trading).

MAA is committed to undertaking the best possible procedures to ensure compliance with the ACNC, ATO, ACFID, DFAT and other relevant regulatory bodies. MAA endeavours to ensure accurate representation of its activities to all of its stakeholders.

1.1 PURPOSE

The purpose of this policy is to ensure:

- (a) A clear distinction between those activities considered as development and non-development activities and ensure clear separation between the two with regards to procedures and processes.
- (b) MAA does not utilise DFAT funds in support of non-development purposes, as defined by DFAT.
- (c) Clarity, transparency and accountability in reporting to MAA's stakeholders and its respective regulatory bodies.
- (d) Our field partners are clear about MAA's non-development policy and its implementation.
- (e) A clear identification and separation of non-development activities for the purposes of calculating Registered Development Expenditure (RDE), in anticipation of DFAT accreditation.

1.2 POLICY SCOPE

This policy applies to all business units and subsidiaries of MAA, and to all persons employed or engaged by MAA including the following personnel:

1.3 ROLES AND RESPONSIBILITIES

MAA seeks to involve appropriate personnel in all levels within the organisation including the board members and staff in the process of risk identification and establishment of practical strategies to ensure a firm approach to MAA's Non-Development Activity Policy.

1.3.1 Executive Management are responsible for:
- Ensuring that all MAA staff members, volunteers and contractors comply with all relevant legislation and policies, including this one.
- Ensuring that all Partner Organisations and their board members, staff members, volunteers and contractors implementing aid and development programs funded by, or through, MAA understand this policy.

1.3.2 People & Organisation Development are responsible for:
- Assisting managers and supervisors with the construction of appropriate training and development programs, designed to aid compliance with this policy.

1.3.3 Managers and supervisors are responsible for:
- Ensuring that they comply with all relevant legislation and MAA policies.
- Ensuring all MAA activities are identifies as developmental or non-developmental activities.
- Providing the CEO and People & Organisation Development Director with all information that relates to breaches or potential breaches of this policy.
- Seeking support and assistance from People & Organisation Development as required

1.3.4 All employees and volunteers are responsible for:
- Understanding and complying with this policy.

1.4 COMPLIANCE AND REGULATORY CONTEXT

MAA ensures that it complies with and implements all relevant codes of conducts and regulations, including:

DFAT: Criterion B3 of *DFAT's NGO Accreditation Manual Guide.*

ACFID: Principal B1.5 of *ACFID's Code of Conduct*

1.5 DEFINITIONS

MAA adopts a definition of Development Activities that is aligned with both DFAT and ACFID, which defines developmental activities as "the activities undertaken in order to reduce poverty and address global justice issues via direct engagement through community projects, 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."

DFAT's RDE is 'the annual eligible expenditure using contributions from the Australian community'. Expenditure include direct costs, support costs and community education costs.

RDE include:

1-   International projects: this expenditure can include

- direct costs, such emergency relief and rehabilitation costs, salaries of staff working to manage and deliver the project,
- indirect costs, such as monitoring & evaluation, costs of property and equipment, costs of logistics,
- administration costs of field-offices.

2-   Community education, which involves costs of educating and informing the Australian community and inviting their active involvement to issues relevant to the program.

The following terms are used in this policy document and are defined as follows:

- **Development Activities** the activities undertaken in order to reduce poverty and address global justice issues via direct engagement through community projects, 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. (This is in line with DFAT and ACFID' s Definition of development activities)
- **Non-Development activities**: activities that fall under the following categories: *Welfare Activities, Evangelical Activities, Partisan Political Activities*
- **Welfare activities**: are activities that are undertaken for assistance to maintain individuals in a particular condition on a long-term basis without clear exit criteria. Activities include 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 (e.g. schools or orphanages).
- **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:** 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.

2 POLICY & PROCEDURES

2.1 POLICY STATEMENT

This policy provides a framework for MAA's compliance with principle *B.1.5* of the *ACFID's Code of Conduct.* MAA ensures that we and our partners can differentiate between development and non-development activities and communicate this appropriately to MAA's stakeholders, donors and the public.

MAA executive staff and managers are responsible for ensuring that all staff members, volunteers, visitors Field partners comply with this Non-Development Activities policy.

The following outline MAA's Non – Development activity policy:

(a) MAA does not undertake evangelical activities as defines in the definitions section of this policy.

(b) MAA does not undertake political support activities as defines in the definitions section of this policy.

(c) MAA does not undertake political support activities as defined in the definitions section of this policy.

(d) From the non-development activities, MAA can only undertake welfare activities. MAA's Non-Development Activities Policy is to clearly separate between aid/development and welfare non-aid/development objectives and activities.

(e) This separation will be clear in all fundraising, programs and other activities, in public communications and in all reporting, including annual reports.

(f) Any fundraising solicitations that include references to both aid/development and non-development activities will provide donors with the choice of contributing to aid and development activity only.

As an aid and development agency, MAA has no mandate to support evangelical activities. MAA also subscribes to humanitarian principles, namely impartiality and neutrality, and as such are prohibited from supporting partisan political activities or taking sides. In keeping with this understanding, MAA has prohibited funding these forms of non-development activities.

Procedurally, MAA ensures against funding non-development activities through various due diligence measures, such as ensuring the relevant clauses are contained in our funding agreements, appraising project proposals against the appropriate non-development purposes criteria and through monitoring changing programs and activities. These preventative measures and our monitoring checks help MAA ensure against unintentionally or inadvertently providing support for non-development activities

2.2 GUIDING PRINCIPLES

MAA 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.

2.3 PROCEDURES

To ensure MAA differentiates between its development and non-development activities, it must implement the following procedures related to planning, fundraising and public communications.

2.3.1 Planning

(a) MAA will apply clear appraisal guidelines which will identify if an activity is development or non-development.
(b) Communication with partners will state MAA's position regarding religious or political activities.
(c) Signatory partners will receive a copy of this policy.
(d) Clauses in all partner Memorandum of Understanding (MOU) will clearly advise all partner organizations that:
   i. No person is excluded based on their political or religious beliefs.
   ii. There is no pressure to convert to a particular religious or political cause.
   iii. Any partner organization that has a religious or political affiliation will be closely monitored to ensure compliance with this policy.
   iv. DFAT funding is not to be used for non-development activities (namely those which would be defined as welfare by DFAT)

Ensure a clear separation for the purposes of finance and accounting between development and non-development activities to enable accurate calculation of RDE.

2.3.2 Fundraising

(a) MAA does not fundraise for any religious-missionary or political activities.
(b) MAA is committed to ensuring that funds and other resources designated for the purpose of aid and development are used only for those purposes.

2.3.3 Public Communications

(a) All public communications including, but not limited to, social media, websites, newsletters, brochures and presentation materials, must be accurate, including photos being accurately captioned, to guard against giving a misleading representation.

3 REVISION HISTORY

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