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Introduction

The Kyeema Foundation (Kyeema) is a not-for-profit NGO that works predominantly to reach resource-poor members of communities in developing countries. Kyeema is wholly committed to delivery of sound development activities and places great importance on operating with honesty, openness and integrity. It is a secular organisation and does not engage in or support any evangelical activities and is not linked to any political party.

In some instances, Kyeema partners may work with local faith-based organisations on the basis that their delivery is without evangelising or making participation conditional on conversion or adherence to a particular religious denomination. It also partners with advocacy organisations from time to time on the basis that their activities are not in support of a political party or candidate.

Purpose

The purpose of this policy is to guide Kyeema and our partners to make a clear separation between aid and development and non-aid and 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 general public.

Guiding Principles

Kyeema supports and is committed to abiding by the following principles:

- accurate representation of our activities to the people we work with, donors and the public
- 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 partner programs have components that involve evangelical or partisan political activities, these will be promoted and accounted for separately.

Definitions

Aid and Development Activities: The concept of aid and development activities can be distinguished by the following principles:

- Strengths-based approaches which encourage people and communities to create solutions for themselves
- Processes that seek to address the causes of poverty
- Processes that seek to empower rights holders to claim their rights and ensure that duty bearers exercise their duties
- Supporting systems and structures which enable people to move out of poverty

Non-Development Activities includes activities undertaken to promote a particular religious adherence or to support a particular party, candidate or organisation affiliated to a political party. 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.

Political activities are defined as supporting a political party, candidate or organisation affiliated to a political party. Examples include:

- NGO staff being involved in party political activities;
- Using funds or resources to facilitate or support a specific political party, candidate, or party-political organisation in a local, regional or general / national election;
- Using funds or resources to facilitate or support independence or separatist movements;
- Using funds or resources to facilitate or support a particular politician or faction to gain power within a government or within a political party structure.

Religious activities are 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. Activities that build up religious structures (including infrastructure, training or organisational) are also ineligible for ANCP funding, unless those structures are specifically designed to provide non-denominational development outcomes.

Welfare activities are defined as care and maintenance, other than in refugee and 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. Welfare may be provided to an individual or family including home-based and institutional care programs, such as those provided by orphanages, homes for the elderly, hospices and the provision of food for those who are destitute. Welfare activities are typically:

- Implemented independently of other sustainable community development activities;
- Include no strategy for integration into broader community development programs;
- Provided on an individual or family basis, rather than on a community basis, and are unconnected to emergency needs;
- Implemented on a long-term basis with no clear exit strategy.

Advocacy includes activities undertaken to change the systemic and structural causes of poverty and disadvantage which may include popular campaigning, lobbying, research, policy positions, alliances and use of the media. It may occur both in Australia and globally (Australian Tax Office).

Partners are individuals, groups of people or organisations that collaborate with or are contracted by Kyeema to achieve mutually agreed objectives in development activities.

Scope

This Policy applies to all Kyeema activities and to all Kyeema Board members, staff, consultants and volunteers. The policy also extends to Kyeema partners and associated implementing organisations.

Policy statement

Kyeema is committed to ensuring that we accurately represent our activities to the people we work with, our donors, and the public.

Kyeema will ensure that we and our partners can differentiate between development and non-development activity and communicate this appropriately to stakeholders, donors and the public.



Kyeema Foundation Non-Development Activity Policy

Kyeema will ensure that all donations given to Kyeema, such as through the Kyeema website, will be used as outlined in the Kyeema Foundation Fundraising Policy and this policy statement.

The procedures for implementation of this policy are detailed in Attachment 1 – Procedures.

Responsibilities

Any activity must be approved by the Chief Executive Officer, and for activities over A\$250,000 by the Board, to ensure they comply with this policy.

The Chief Executive Officer, in consultation with the Kyeema Board, is responsible for the implementation of this policy and for advising on the need to review or revise this policy as and when the need arises.

Where compliance issues are identified, the Chief Executive Officer will work with staff and other relevant stakeholders to address these issues promptly. The policy will be reviewed every three years and revised as needed, with the approval of the Board.

Information Source

[Commitment 7.3 - ACFID](#) (7.3.2) 'Member development initiatives consistently demonstrate the separation of development activities from non-development activities.'

[DFAT Overseas Aid Gift Deduction Scheme Guidelines](#)

Related Documents

This policy is to be read in conjunction with:

Kyeema Foundation Constitution

Kyeema Foundation Partnership Agreement

Authorisation

Signature of Policy Officer

Sinéad Magill

Name of Policy Officer

08/10/2024

Date

Attachment 1 Procedures

Programming

1. The Chief Executive Officer will appraise all project proposals to determine whether they include non-aid and development components.
2. Any issues will be recorded and will be followed-up to ensure that the policy requirements are satisfied before the project is approved.
3. Any aspects of the project that should be closely monitored over the life of the project will be recorded to ensure compliance with this policy.
4. When assessing potential partners Kyeema will identify whether the partner is engaged in non-development activities, and if so, record how it is able to manage and account for them separately to aid and development activity.
5. Components of projects that represent non-development activity will be managed, reported and accounted for separately to aid and development components.
6. Where relevant, in-country project monitoring will include monitoring of the separation of non-development activities from aid and development activities.

Fundraising

Kyeema is not involved in any non-development activities as defined in this policy nor will seek any funds for this type of activity.

Where partner programs have components that involve evangelical or partisan political activities, these will be promoted and accounted for separately as follows:

1. Fundraising materials will be reviewed prior to publication to ensure that solicitations make a clear distinction between aid and development and non-development activities.
2. Where fundraising solicitations include references to both development and humanitarian and non-development activities, they will be reviewed to ensure that donors are provided with the choice of contributing to aid and development activity only.
3. Funds raised non-development activity will be tracked, managed, reported and accounted for separately to those raised for development and humanitarian components.

Advocacy campaigns

From time to time Kyeema partners with advocacy organisations on the basis that their activities are not in support of a political party or candidate.

Partners

1. Kyeema will state its position on support for non-development activity in all communication with new partners.
2. Signatory partners will receive a copy of this policy.
3. All Kyeema's partner agreements will include clear definitions of aid and development activity and non-development activity and will require the partner to agree that Kyeema funds designated for aid and development purposes will not be used to fund any non-development activity.
4. The definitions of development and non-development activity and the need for a separation between development and non-development activity will be reinforced in ongoing dialogue

between Kyeema and its partners. Kyeema will ensure that its partners both understand and comply with this policy.

Communications

1. The Communications Manager will review all articles written by overseas project partners or photos supplied by partners for reporting materials to ensure differentiation between development and non-development activities.
2. All communications materials will be reviewed prior to publication to ensure separation of reporting and fundraising for aid and development and non-development activities.

Policy Implementation and Review

1. Confirmation of internal compliance with this policy will be undertaken at least once annually.
2. The policy will be included in the induction process for all new staff. Training will be regularly organised to present the policy to staff and keep them updated on any changes.