

SAID Non-Development Activities Procedure

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Overview				
Overarching Policy	This procedure is implementing the Financial Management and Control Policy (BS_FI_POL_TFMC).			
Purpose	This procedure provides additional, specific and complementary guidance to Salvation Army International Development (SAID) personnel and the SAID Practice Advisory Group (PAG) on the key principles underpinning non-development activities and outline the minimum standards for development, evangelism, welfare and partisan politics within international programming.			
Who does this apply to?	This procedure applies to SAID personnel, implementing partners and persons engaged or involved, either directly or indirectly, in SAID programs, including the SAID PAG.			
Effective date	12/05/2022			

Definitions

Definitions are located in the Glossary of Terms and Definitions.

Procedure Statement

Development, Evangelism and Welfare

Principles

SAID seeks to meet human needs:

- In the international community, and
- Through both development and non-development evangelical and welfare projects, known as mission support

SAID has committed to ensuring accurate representation of our international development and non-development activities to project beneficiaries, partners, organisations, donors and the public.

Funds designated for the purpose of international aid and development activities will be used only for those purposes and will not be used for any non-development activity, including persuading a person to adopt or change a particular religious adherence or any projects identified as welfare, including assistance that maintains individuals in a particular condition on a long-term basis.

In the event of there being unspent funds, the implementing territory may request a reallocation of those funds with the approval of the funding territory. The unspent funds will be returned to the funding territory if the request is not approved.

Difference between welfare and development

Difference between The following table sets out the key differences between welfare and development.

Non-Development (Welfare)	Development
Direct assistance provided to meet immediate needs of individuals	Improvement by meeting long term needs of a community
Selected individuals from the community benefit	No discrimination with fair distribution of benefits in a community
Work is done for/to individuals or on behalf of a community. The focus is on what 'we' can do for individuals/a community with limited participation by them on program design	Work with a community to empower them. The focus is on what communities can do for themselves, with their participation shaping what the program will achieve
Addresses immediate need or symptoms of poverty by giving material resources	Actual need addressed when community gains knowledge, skills, abilities and/or access to information for the purposes of solving problems or increasing self-sufficiency (capacity building)
Creates dependency as ongoing assistance required after program stops for benefits to continue	Creates self-sufficiency as benefits are sustainable after program stops

The focus of SAID is on community-based programs. It is recognised that there are programs involving Salvation Army institutions that are also identified as development.

The following criteria will be used to assess programs that involve TSA institutions as to whether it is primarily a development or non-development (welfare or evangelical) program:

Non- Development (Welfare or Evangelical) Program involving Salvation Army institutions	Development Program involving Salvation Army institutions
 Project funds, for example: Running costs of an institution Textbooks, uniforms or school fees for individual children Vehicle for an institution Children's feeding program Building construction or maintenance Training for Officers, Employees and Volunteers Project may: Appeal more to people with a Christian faith The project may aim to encourage the Christian faith as a specific purpose 	 Project includes: Involvement and partnership with the local community Connected to other sustainable community development activities Seeks to build local capacity to meet local needs and ongoing maintenance Assists an institution towards self-sustainability or is connected to emergency needs Has an exit-strategy

Project Design and Implementation

- SAID personnel will work with the partner to ensure a clear understanding of the difference between development and non-development activities.
 - Where it appears the partner has misunderstood the difference between development and non-development activities, the SAID personnel member will undertake capacity building initiatives to correct any misunderstandings. This may be conducted remotely via email, over the phone/skype or while incountry on a monitoring visit
 - Ongoing dialogue between the SAID personnel member and the partner will reiterate the distinction between development and non-development activities and the need for separate projects for these activities
- SAID personnel will complete the Project Appraisal Document to ensure community members have not been chosen or excluded as beneficiaries of a development project because of adherence to or adoption of religious beliefs, or participation in church, religious or non-religious activities. This is in line with the guiding principle of non-discrimination
 - For Development Projects. where the Project Appraisal Document identifies that beneficiaries have been chosen based on religious grounds, the project will not be approved. The SAID personnel member will work with the partner to correct the issue prior to submission to SAID PAG
- All Memoranda of Understanding (MoU) SAID enters into with a partner for development activities, will require the partner to agree that funds designated for development purposes will not fund any non-development activity, including the adoption of a particular religious adherence or welfare activities

Monitoring, Evaluation and Continuous Improvement

- While on a monitoring visit, the SAID personnel member will confirm the partner's adherence to the MoU and the requirements of this procedure through the completion of the Partner Capacity Assessment and the Trip Report
- Partner compliance with this procedure will also be assessed through project reports and email/correspondence between SAID personnel and the partner
- Where it is suggested that the requirements of this procedure have not been followed, the MoU will allow for future funding for the project to be suspended until the outcome of an investigation by SAID
 - Where the investigation confirms that this procedure has not been followed, all future funding for the project will be suspended until the concern/issue is corrected. It is at the SAID PAG's discretion whether it instead chooses to terminate the MoU for the project
- Where there is a concern that the requirements of this procedure have not been followed, the project evaluation will be utilised to ensure there are no underlying patterns of particular religious affiliation or welfare activities attached to the project. This may be fulfilled through a review of the participant numbers, interviews with participants, the participation of community groups in the design and planning stage, or participant stories

Media and Promotions

- Fundraising materials will be reviewed by the Head of SAID (as outlined in the SAID Transparency and Verification of Information Procedure) prior to publication to ensure that solicitations make a clear distinction between development and nondevelopment international projects. This includes identifying that donations towards development activities will be tax deductible and donations towards nondevelopment activities are non-tax deductible
- Where fundraising solicitations include references to both development and nondevelopment activities, the Head of SAID will ensure that donors are provided with the choice of where to contribute funds to
- All receipts issued by SAID to donors will clearly indicate the tax status of donations
- The SAID Accountant will ensure that funds received for development and nondevelopment activities are accounted for separately
- Publications, including donor updates, news articles and reports related to international projects will be reviewed by the Head of SAID (as outlined in the SAID Transparency and Verification of Information Procedure) prior to publication to ensure differentiation of reporting for development and non-development activities
- The Head of SAID will ensure all SAID electronic media content is reviewed on a regular basis (as outlined in the Transparency and Verification of Information Procedure) to ensure that this procedure is complied with

Partisan Politics

Principles

SAID, in line with TSA internationally, is politically non-partisan and will not promote or endorse specific political parties, candidates, or organisations affiliated to a political party, financially or otherwise. SAID will not discriminate on the basis of political affiliation.

SAID subscribes to the practice of political non-partisanship, that is, not supporting any one party, candidate or organisation affiliated to a political party.

SAID engages advocacy activities in its programs to change the systemic and structural causes of poverty and disadvantage, which adheres to the practice of political non-partisanship.

Personnel Conduct •

- All personnel will not, in the course of their work as a representative of SAID, promote activities that could be seen as promoting one political party or organisation affiliated to a political party, over another
- Personnel will ensure that political affiliation will not serve as a pre-requisite or incentive for participation in SAID activities or assistance.
- In relation to individuals or organisations listed on counter-terrorism prohibited listings, please refer to the SAID Counter Terrorism Procedure

Administration

- All funds received by SAID, either tax deductible or non-tax deductible, will not be used for promotion or support of one political party or organisation affiliated to a political party, over another, either domestically or internationally
- SAID will ensure that all media, promotional and educational material complies with this procedure prior to being published
 - It is the responsibility of the Head of SAID to ensure that any material to be published on behalf of SAID complies with this procedure. The Head of SAID may delegate this responsibility to any personnel
 - This is to occur in the same process as outlined in the SAID Transparency and Verification of Information Procedure

Project Management

- Every MoU entered into with a partner will require that the partner agree that funds designated for development purposes will not fund partisan political activities
 - Where a partner fails to comply, funding may be suspended and future projects cancelled as outlined in the MoU
- Compliance with the MoU will be monitored through the review of project reports and Partner Capacity Assessments. Project activities will be scrutinised during monitoring visits to ensure the information provided in project reports are accurate
 - Compliance with this procedure will be confirmed by the SAID Project Coordinator responsible for the project. This will be overseen by the SAID Program Manager
 - The SAID Project Coordinator will ensure that project proposals are reviewed against the requirements of this procedure
 - SAID will not approve a project if it does not comply with this procedure.
 Where this occurs, the SAID Project Coordinator will collaborate and support the partner to modify the Project Proposal so it does comply
 - While on monitoring visits, the SAID Project Coordinator will engage with project beneficiaries and other stakeholders to confirm the details provided in project reports are accurate, and the project complies with this procedure

Risk and Compliance

Obligation

All TSA personnel under the terms of their service, employment, engagement or contract must comply with all TSA policies, procedures and supporting documents.

Consequences of non-compliance

Failure to comply with this procedure may result in disciplinary action and, in serious cases, termination of employment or engagement with TSA.

Location

Repository

Territorial Policy Hub

Feedback

Feedback is encouraged

Feedback is used to improve and enhance the impact of this procedure. It will be considered when reviewing and updating the document.

Who is feedback provided to?

All feedback is to be forwarded to the Head of SAID via email to policy@salvationarmy.org.au.

Related Documents and References

Policy Documents	Financial Management and Control Policy (BS_FI_POL_TFMC)		
Related Policy Documents	SAID Transparency and Verification of Information Procedure		
Related Legislation	N/A		
Funding Agreement Requirements	N/A		
Governance/ Accreditation/ Certification Standards	Department of Foreign Affairs and Trade Accreditation Australian Council for International Development Code of Conduct Standard Australian Charities and Not-for-profit Commission (ACNC) External Conduct Standard		
Audit Report Findings	N/A		
Other Relevant Documents /Resources	N/A		

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Document Control Information						
Document ID	BS_FI_P	BS_FI_PRO-15_TFMC				
Theme	Business Support					
Category	Finance					
Policy Owner	Head of Salvation Army International Development					
Policy Implementer	Program Manager, Salvation Army International Development					
Approval Authority	Head of Salvation Army International Development					
Review Date	N/A					
Next Review Date	May 2025					
Previous Documents	N/A					
Document History	Version	Date Approved	Summary of Changes			
	1-0	11/05/2022	Inaugural Version			