



International Programs Non-Development Activity Policy

Policy Statement

Baptist World Aid Australia (“BWAA”) is committed to ensuring that our international programming is consistent with our Vision, Mission, and Values, and informed by a human rights and strengths-based approach. This Policy outlines the distinction between development activity and non-development activity and the appropriate treatment of each.

Development and humanitarian activities are those which are based on the principles of participation, equity, non-discrimination, accountability and sustainability.

Non-development activities are those which include religious activities / evangelism, partisan political activities, and welfare activities. Each of these principles are defined in the Definitions section below.

BWAA’s commitment to supporting development activity and distinguishing it from any non-development activity is demonstrated by being a signatory and member of the Australian Council for International Development (ACFID) Code of Conduct, and status as a Fully Accredited NGO of the Department of Foreign Affairs and Trade (DFAT).

Scope and Purpose

This Policy applies to all projects and activities undertaken by BWAA, including community development and humanitarian assistance.

The purpose of this Policy is to:

- Ensure transparent and appropriate use of funds consistent with the intent for which they were given
- Prevent the use of aid and development resources for non-development purposes
- Ensure compliance with DFAT ANCP eligibility and RDE requirements
- Safeguard communities from coercion, discrimination, or conditionality related to political or religious beliefs

This Policy extends to all staff, contractors, volunteers, partners, and implementing organisations. It applies to all funding sources, including private donors, institutional donors, and DFAT ANCP funding.



BOLD



CALLED



COLLABORATIVE



LEARNING

Policy Objectives

The objectives of this Policy are to:

1. Address the separation of development and humanitarian activities from non-development activities and ensure that this clear separation is reflected in relevant procedures and processes.
2. Ensure accurate representation of our activities to the people and partners we work with, communities we serve and the general public.
3. Address BWAA's DFAT and ACFID compliance obligations when communicating with or soliciting donations from private donors, the public, and institutional donors.
4. Promote sustainable, long-term development outcomes of program interventions.

What does this policy look like in practice?

BWAA recognises that non-development activities pose a compliance and reputational risk if not appropriately managed. The separation of development and non-development activities is treated as a core risk control and is addressed through project appraisal, partner due diligence, contracting, financial acquittals, monitoring, and ongoing communication with Partners and supporters.

BWAA is committed to abiding by the following principles and practices.

Transparency and accountability

1. BWAA is committed to ensuring accurate representation of our activities to the people and partners we work with, communities we serve and the general public.
2. BWAA will 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.
3. BWAA 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 can be distinguished by the following principles:
 - a. Strengths-based approaches which encourage people and communities 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, disaster recovery and meeting the immediate needs of refugees and internally displaced people.
 - f. The principles of participation, equity, non-discrimination, accountability and sustainability.

Separation controls and risk management

4. BWAA does not provide support for evangelical activities, partisan political activities or welfare activities, and considers them to be non-development activities (see Definitions). We ensure that any non-development activities are excluded from DFAT-funded projects, and are managed, funded, and reported separately.
5. BWAA will reflect this separation in our project selection criteria and in partnership/project documentation with our partners to ensure such separation extends to partner organisations. In our Project Agreements, BWAA explicitly stipulates:

Ensure that Project Funding is not used to support programs and/or staff or others that involve any Non-Development Activity as per BWAA's Non-Development Activity Policy.

6. BWAA will observe the following procedures for identifying and separating development and non-development in programs and projects:
 - a. Appraise all project proposals to determine whether they include non-development components and ensure policy requirements are satisfied before the project is approved.
 - b. Assess Partner's governance, faith-based and political affiliations, financial controls, and ability to separately account for activities.
 - c. If project or partner is identified as posing a moderate to high risk, record any aspects that should be closely monitored over the life of the project and partnership to ensure compliance with this policy.
 - d. Any activities that represent non-development activities will be managed, reported and accounted for separately to aid and development components.
7. BWAA will observe the following engagement and communication with implementing partners:
 - a. Communication with potential/new partners will state BWAA's position on support for non-development activity.
 - b. All implementing partners will receive a copy of this policy annually, identifying and explaining any updates.
 - c. Partner documentation (such as Project Agreements) will include clear definitions of development activity and non-development activity.
 - d. Partner documentation will require the partner to agree that BWAA funds designated for development and humanitarian purposes will not be used to fund any non-development activity.
 - e. BWAA will engage in ongoing dialogue with its partners to reinforce the definitions of development and non-development activity, and the need for a separation between development and non-development activity.
 - f. Ongoing monitoring with include reference to narrative reports, financial acquittals, spot checks or audits where risk is deemed moderate to high.

Communication and fundraising

8. BWAA will observe the following actions regarding communication and fundraising:
 - a. Review communications and fundraising materials prior to publication to ensure separation of communicating, reporting and fundraising for development and non-development activities.
 - b. Any funds raised for non-development activity will be tracked, managed, reported and accounted for separately to those raised for development and humanitarian components.

Communications and fundraising materials will not imply that aid or development assistance is conditional on participation in religious or political activities, nor misrepresent non-development activities as aid or development.

Responsibilities

Position	Responsible for:
Director of International Programs	<ul style="list-style-type: none">• Implementation and oversight of this Policy.• Promptly addressing any identified non-development activities. Corrective actions may include suspension or modification of activities, suspension of payments, financial remediation, or notification to donors where required.
Finance Department	<ul style="list-style-type: none">• Financial controls, acquittals, and RDE integrity.• Confirming correct use of expenditure during financial reviews.• Reporting any identified non-development activities, breaches or suspected breaches to Director of International Programs
Executive and Board	<ul style="list-style-type: none">• Governance oversight and assurance of compliance.
Director of National Engagement	<ul style="list-style-type: none">• Providing input into the operationalisation of the policy
International Program Coordinators	<ul style="list-style-type: none">• Conducting reviews of implementation of this policy during field monitoring• Reporting any identified non-development activities, breaches or suspected breaches to Director of International Programs

Compliance with this policy will be monitored by the positions listed in the table above.

Noncompliance with this policy will be managed in accordance with the Breaches are managed in accordance with BWAA's complaints, misconduct and whistleblowing policies and procedures.

Accessing the Policy

This policy will be available on BWAA's Governance Hub in the Policies and Procedures Teams Channel and on BWAA's website.

This policy will be provided to all relevant staff during induction.

Review and Amendment

This policy will be reviewed triennially or sooner as required, and amendments will be made as required in response to changing circumstances.

Workshops/meetings will be organised to socialise the policy to staff and keep them updated on any changes. Ongoing policy socialisation and training are provided to implementing partners.

Definitions and principles

Accountability – Accountability is the processes through which an organisation makes a commitment to respond to and balance the needs of stakeholders in its decision-making processes and activities, and delivers against this commitment.”¹

Development and humanitarian activities – Development and humanitarian activities are those that:

- Address the causes of poverty, inequality and injustice
- Support sustainable, locally led change
- Are based on participation, equity, non-discrimination, accountability and sustainability
- Enable rights-holders and strengthen systems and structures
Include humanitarian assistance that is needs-based, impartial, time-bound and linked to recovery or resilience outcomes
May include limited inputs to address immediate needs, provided they are integrated within a broader framework of sustainable development.

These activities are eligible for DFAT ANCP funding and may contribute to Recognised Development Expenditure (RDE). Development activities must demonstrate a clear intent to contribute to sustainable development outcomes, address the causes of poverty or injustice, and support locally led change.

Equity and Non-Discrimination – BWAA acknowledges that all human rights are indivisible, universal, and inalienable. There is an obligation stated in all human rights instruments that equal rights and opportunity should be given to all people.

Human Rights Based Approach to Development – An approach that frames development within the international human rights conventions. Social, Economic and Cultural rights are often focussed on by development agencies. Indicators of success are generally the extent of change in the fulfilment and respect of specific human rights rather than needs.

Humanitarian Assistance/response – Action taken with the objective of saving lives, alleviating suffering and maintaining human dignity during and after human-induced crises and natural disasters, as well as action to prevent and prepare for them. Humanitarian assistance provided in

response to emergencies is not considered welfare where it is time-bound, needs-based, impartial, and linked to recovery or resilience outcomes.

Non-Development Activities- Non-development activities include, but are not limited to:

a. Religious / Evangelical Activities

Activities that promote a particular religion or are intended to convert individuals or groups to a specific faith or denomination, including missionary and theological activities. Activities that build up religious structures (including infrastructure, theological training or organisational activities) are considered 'religious activities', unless those structures are specifically designed to provide non-denominational development outcomes.

b. Partisan Political Activities

Activities that support or oppose a political party, candidate, faction or movement, or seek to influence electoral outcomes. Some examples of political activities 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.

c. Welfare Activities

Activities that provide long-term assistance to individuals or families without a clear development, recovery or exit strategy, and without integration into broader community development outcomes. Examples include long term institutionalised care programs as provided by orphanages, homes for the elderly, support to the elderly, support to people with disability or the provision of food for the destitute without being part of broader sustainable development initiatives. (Assistance and/or assistive devices provided to people with disability and the elderly to enable their participation in community and development activities as part of a wider project should not be considered welfare).

Sustainability – Sustainable outcomes will seek to ensure that the benefits of any intervention continue beyond the life of the project by building the capacity of the targeted community. Sustainable development activities will "meet the needs of the present without compromising the ability of future generations to meet their own needs."²

Participation – Promoting the empowerment of stakeholders in each development project. Participation concerns the way in which an organisation involves stakeholders in its decision-making processes and activities. For BWAA, our commitment is to active, meaningful participation. This means that people can participate on their own terms (where this does not impinge on other's right to participate), and that their participation, voice and opinions are valued. This also means that people's choice *not* to participate is respected, so long as that choice has been made freely and in an informed manner. We are strong advocates of the idea that attendance *does not equal* participation, and for participation to be meaningful it must be recognised and valued

Recognised Development Expenditure (RDE) – The total eligible contribution that each NGO receives from the Australian community for the organisation's own development assistance, emergency relief or rehabilitation activities overseas and development education in Australia. Eligible contributions include donations of cash, gifts in kind and volunteer services. Up to half of the RDE can be for eligible gifts in kind and/or eligible volunteer services.

Strengths-Based Approach – An approach to development that focuses on building on the existing strengths (for example, knowledge, skills, resources, assets) in communities, seeking to empower them to direct their own development priorities.

Related Policies and Procedures

This Policy should be read in conjunction with the following:

- BWAA Human Rights Policy
- BWAA Complaints Handling Policy
- BWAA Whistleblowing Policy

External References

This Policy refers to the following:

- ACFID Code of Conduct
- DFAT Recognised Development Expenditure Explanatory Notes (2024).
- DFAT ANCP Manual (2025)

Document Control Information

International Programs Non-Development Activity Policy	
Owner	Director of International Programs
Master Copy	Risk & Governance Team
Document Type	Approval required
<input type="checkbox"/> Governance, Substantive Operational/ Organisation Policies	Board
<input checked="" type="checkbox"/> Operational/ Organisation Policies	Executive
<input type="checkbox"/> Departmental Policies	Department Director
<input type="checkbox"/> Procedure	Department Director
<input type="checkbox"/> Substantive Procedure/ Procedure that impacts whole organisation	Executive
<input type="checkbox"/> Other BWAA Documents: work instructions, forms, guidelines, manuals	Department Director
<input type="checkbox"/> Other substantive BWAA Document	Departmental Director, Executive and Board
Date created	2006
Date last reviewed	14/01/26
Date Approved	
Date next Review	

Date	Version	Revision Description	Reviewed / Updated by
2006	1	Policy created and known as “No Strings Attached – Non-Discrimination based on Religion”	Program Manager
04/05/2015	2	Reviewed and updated entire policy to ensure conformity with ACFID and DFAT compliance requirements	Director of Business
November 2015	3	Reviewed by PPC and updated (definitions; Sustainability and Equity & Non-Discrimination)	Director of International Programs
November 2015	4	Board amendments applied (No Strings Attached, uniform use of hyphen and capitals when “non-development” is referred to spelling errors & reference to correct Checklist)	Governance Coordinator
14/11/2016	5	Moved Policy to new BWAA Template	Policy QA Coordinator

21/11/2016	6	Rectify typing errors and make Review Date biennially	Governance & Compliance Specialist
11/01/2017	7	Changed welfare definition from “support to the disabled” to “support to people with disability” Amended final sentence of paragraph one to updated list of non-development activities and remove redundant reference to “no strings attached”.	Director of International Programs and International Programs Manager – Grants
14/11/2019	8	Updated with minor amendments	Policy QA Coordinator
23/09/2020	9	Reviewed and updated	International Programs Manager – Grants
September 2022	10	Reviewed against re-accreditation criteria with minor amendments	International Programs Manager – Grants
14/01/26	11	Reviewed and updated against ACFID Code updates and new policy template for BWAA. Updated definitions to align with ACFID Code wording e.g locally led Updated references to other relevant BWAA policies Strengthened risk mitigation controls	Director of International Programs