

Non-Development Activities Policy

1. Purpose

HOME in PLACE is a Not-for-profit and Non-Government International Development Organisation that promotes social justice and fights poverty and homelessness. It works with communities around the world to provide safe, secure and sustainable shelter and build and strengthen sustainable communities .

One of HOME in PLACE's main international strategies is active engagement with diverse, varied and relevant stakeholders, via collaborations and partnerships in the planning, implementing, monitoring and evaluating of our international development activities and initiatives. This engagement is targeted at different levels including regional, national, local and communal. These stakeholders may include government, non-government, community-based organisations, , faith- based organisations and the private sector.

HOME in PLACE's MoU with our partners includes clear definition of the scope of activities including whether it is a development and humanitarian and non- development activities as well as clear accountability and reporting responsibilities on project performance including the use of grants, funds and donations.

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

The purpose of this policy is to guide HOME in PLACE and our partners to make a clear separation between development and humanitarian and non- 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.

HOME in PLACE is a Not-for-profit and non-government International development organisation and does not engage in, or support any evangelical activities and is not linked to any political party.

In some instances, HOME in PLACE partners with local faith-based organisations, that have common mission and values as HOME in PLACE, on the basis that their service delivery is without the intention of evangelising or making access to and participation in these services 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.

2. Scope

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HOME in PLACE Non-Development Policy applies to all HOME in PLACE international development activities.

The policy is applicable to all HOME in PLACE's employees and volunteers. The policy also extends to HOME in PLACE's partners and associated implementing organisations.

3. Policy Statement

Background

HOME in PLACE is an international development organisation that promotes social justice and fights poverty by working with communities around the world.

It is a not-for-profit organisation and does not engage in or support any evangelical activities and is not linked to any political party.

In some instances, HOME in PLACE partners 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.

Definition of Aid and Development Activities

HOME in PLACE 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:

- Strength based approaches that encourage people and communities to create solutions for themselves.
- Processes that seek to address the causes of poverty and homelessness.
- Processes that seek to empower rights holders to claim their rights and ensure that duty bearers exercise their duties.
- Supporting systems and structures that enable people to move out of poverty and homelessness.
- Humanitarian response and emergency relief, disaster recovery and meeting the immediate needs of refugees and internally displaced people.
- International development activities that will provide safe, secure and sustainable shelters and build and strengthen sustainable communities and capacities.

Definition of Non-Development Activities

HOME in PLACE is a Not-for-Profit and non-government international development organisation and does not provide support for evangelical activities and partisan political activities. It has adopted the following definition of Non-development activities:

- Evangelical activities are those activities that promote a 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 a specific political party, candidate to gain power or to support organisation(s) affiliated with a

political party.

However, 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.

Compliance

This Policy provides a framework for HOME in PLACE's compliance with the Commitment to accountability to our stakeholders in the ACFID Code of Conduct, Compliance Indicator 7.3.2 which states that

Member's development initiatives constantly demonstrate the separation of development activities from non-development activities.

To be compliant with this indicator, HOME in PLACE will:

- Develop and implement policy, statement or guidance documents that addresses the separation of development activities from non-development activities in the following areas:
 - Program design and implementation,
 - Expenditure reporting,
 - Fundraising,
 - Advocacy campaigns,
 - Communications,
 - Choice for donors, and
 - Partnership
- Through HOME in PLACE's Quality Assurance Framework and processes to ensure that our international development activities and initiatives consistently show evidence of the separation of development and non-development activities.
- Extend this requirement for separation of development and non-development activities to Partners through MoUs or similar official agreements.

Guiding principles

HOME in PLACE 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.

Control Procedure

HOME in PLACE ensures that we and our partners can differentiate between development and non-development activity and communicate this appropriately to stakeholders, donors and the public via a range of communication medias and avenues.

HOME in PLACE has procedures to implement the following:

Separation of aid and development and humanitarian and non-development in programs and projects

- HOME in PLACE will appraise all international program/project proposals to determine whether they include non-aid and non-development components and document these components.
- These documented identified non-aid and Non-development components will be followed up to ensure that the management of these component is in accordance with and meets the requirements set out in this Policy (Non-Development Policy) and other related policies before the project proposal is approved.
- These documented identified non-aid and Non-development components will be closely monitored and reported over the life of the project to ensure compliance with this policy.
- Partner capacity assessment processes require the signatory to identify whether the partner is engaged in non-aid and non-development activities, and if so, how the Partner can manage and account for these activities separately from other aid and development activity.
- Any components of projects that represent non-development activity will be managed, reported and accounted for separately to aid and development components.
- In-country project monitoring will include monitoring of the separation of non-development activities from development and humanitarian activities as part of project monitoring, evaluation and learning processes.

Separation and development and humanitarian and non-development in communications – including advocacy materials.

Procedures

- HOME in PLACE has guidelines in place that address appropriate reporting on HOME in PLACE development and humanitarian and non-development activities in organisational promotional materials, such as HOME in PLACE organisational brochure and Profile, Advocacy /Position Statements, Annual Reports, Project Monitoring & Progress Report.
- All articles written by international project partners or photos supplied by partners for reporting or promotional or advocacy materials are reviewed for differentiation between development and humanitarian and non-development activities.
- Communications materials including promotional and advocacy are reviewed prior to publication to ensure separation of reporting and fundraising for development and humanitarian and non-development activities.
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Separation of development and humanitarian and non-development in fundraising and provision of choice for donors.

Procedure

- HOME in PLACE's fundraising materials will be reviewed prior to publication to ensure that solicitations make a clear distinction between aid and development and nondevelopment activities.
- Where fundraising solicitations include references to both development and humanitarian and non-development activities, solicitations received will be reviewed to ensure that donors are

provided with the choice of contributing to aid and development activity only.

- If there are any funds raised for non-development activity, these funds will be tracked, managed, reported and accounted for separately to those funds raised for development and humanitarian components.

Extending the separation of development and humanitarian and non- development activities to partners

Procedures

- HOME in PLACE will inform our potential new partners about HOME in PLACE's position on support and or funding for non-development activity.
- HOME in PLACE will issue our potential and current partners a copy of this policy.
- HOME in PLACE's Memorandum of Understanding (MoU) or equivalent with potential and current partners will include clear definitions of development and humanitarian activity and non- development activity.
- HOME in PLACE's Memorandum of Understanding (MoU) or equivalent will require the potential and current partner to agree that the HOME in PLACE funds designated for development and humanitarian activities, will not be used to fund any non-development activity.
- The ongoing communication and liaison between HOME in PLACE and our partners will reinforce the Partners' understanding of the definitions of development and humanitarian and non-development activity and the need for a separation between development and humanitarian and non-development activity, including accountability and reporting.

Policy Implementation and Review Procedures:

HOME in PLACE will review this policy on a regular basis, at least once in every two years. Confirmation of HOME in PLACE and our partners compliance with this policy, via an internal audit process, will be undertaken at least once annually.

Introduction of HOME in PLACE Non-Development policy will be included in the induction process, to be read and sign off by all new **workers**, in particular **workers** engaging in HOME in PLACE's **advocacy**, **fund raising**, **grants & donations** and international development activities in and outside Australia Refresher's workshop will be regularly organised to present the policy to the above current worker as and when there is amendment or revision of the current Policy, to keep them updated on any changes in legislation and requirements.

4. Responsibilities

All HOME in PLACE workers have an obligation to:

- familiarise themselves with and ensure they have a clear understanding of HOME in PLACE policies and procedures,
- observe and implement such policies, and associated procedures in delivering services to HOME in PLACE clients,
- inform HOME in PLACE's clients of the impact of this policy on them and assist them to understand their rights and obligations, as required,
- identify issues that require amendment to this policy document and complete the relevant documentation to propose any amendments, and
- report breaches of HOME in PLACE's policies or procedures.

The relevant Group Executive Manager is ultimately responsible to:

- ensure all stakeholders within their area of responsibility are informed about HOME in PLACE Policies and Procedures,
- ensure appropriate processes and controls are implemented to enable the correct application of and adherence to relevant policies and procedures, and
- ensure appropriate processes and controls are implemented to enable breaches of approved HOME in PLACE's Policy and Procedures to be reported and managed.

5. Implementation and Review

This policy is listed on HOME in PLACE's Controlled Documents Register and is a controlled document requiring approval of any changes. It may not be amended or shared outside HOME in PLACE without approval. The policy is reviewed regularly and published on HOME in PLACE's SharePoint intranet once approved. Employees receive communications and training on new and reviewed policies and procedures.

HOME in PLACE complies with relevant contractual compliance obligations and jurisdictional laws and regulations when implementing this policy. Confirmation of internal compliance with this policy is undertaken regularly.

It is the responsibility of HOME in PLACE Group Executive Services (GESAdmin@homeinplace.org) to maintain and update the HOME in PLACE's Master Policy Document, Policy Directory and the Policy Review Register, administer the review and approval process and inform and distribute new and amended policies and procedures once approved (refer PROC-011 Policy and Procedure Development Approval).

HOME in PLACE Workers should refer to [SharePoint Company Documents Policy and Procedure site](#) for the latest version which takes precedent over any uncontrolled version. If this document is printed, downloaded, or saved elsewhere from this site it becomes an uncontrolled version.

For further information contact the Responsible Officer listed under Document Information.

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6. Resources and related documents

This Policy will be read in conjunction with the following HOME in PLACE's Policy and ACFID's Documents:

Related documents

- Planning & Evaluation Policy
- Business Planning Policy
- Principles of Partnership
- MoU Template (Terms)
- Communication Policy
- Quality Framework

Related legislation/standards

- ACFID Code of Conduct: Definitions

7. Definitions

Please refer to HOME in PLACE Glossary of Definitions for Policies and Procedures. Terms and definitions identified below are specific to this policy and are critical to its effectiveness:

Term	Definition
Appeals	A Community housing appeal is defined as 'any expression of dissatisfaction with a decision made by a social housing provider to provide or not provide a service (such as housing, transfer or priority on the housing register) or, a decision relating to a tenant or service user's dissatisfaction of a decision made by the organisation.' An application for a decision to be reversed or overturned. Includes but is not limited to: • Allocation decisions; • Level of rent or rent subsidy; • Eligibility for a housing transfer; • Permission to undertake modifications; • Permission to keep pets; • Calculation of water charges;
Compass	Compass Housing Services Co. Ltd. Trading as HOME in PLACE and includes its related body corporate (as defined by section 9 of the Corporations Act 2001 (Cth)) and as a charity with the Australian Charities and Not-for-profit Commission (ACNC) .
Complainant	Person with a Complaint ongoing with HOME in PLACE.
Complaints	An expression of dissatisfaction with an aspect of the services provided by [Organisation], where the complainant is unhappy with the standard or type of service. Types of Complaint include: Where HOME in PLACE have failed to provide or there has been a delay or problem in providing a service; Where HOME in PLACE have failed to follow or have been unfair or inconsistent in applying our policies or procedures. Where HOME in PLACE have failed to keep Tenants informed, through lack of or insufficient information Where there has been inappropriate behaviour or attitude from a HOME in PLACE Employee or contractor.
Director	Has the same meaning as defined in the Corporations Act 2001 Part 1.2 Division 1 Section 9 Dictionary in Australia and as defined in the Companies Act 1992 Part 1 Section 2 Interpretation.
Employee	A person engaged under an employment agreement or award by any company in the

Term	Definition
	HOME in PLACE Group.
Executive Manager	Many positions within HOME in PLACE include the title “Executive Manager”. Regardless of whether an Executive Manager heads a Business Unit, the delegated authority of each Executive Manager depends on the functions and reporting relationship of the Business Unit for which the Executive Manager is responsible. Executive Managers should refer to the document HOME in PLACE Organisational Chart in Terms of Levels of Delegated Authority for confirmation of the band of authority they hold.
HOME in PLACE	Compass Housing Services Co. Ltd. Trading as HOME in PLACE and includes its related body corporate (as defined by section 9 of the Corporations Act 2001 (Cth)). This includes Compass Housing Services Co (Queensland) Ltd Trading as HOME in PLACE and Compass Housing Services Co (Victoria) Ltd Trading as HOME in PLACE both of which are a wholly owned subsidiary of Compass registered in Australia.
HOME in PLACE (New Zealand)	HOME IN PLACE (NEW ZEALAND) LIMITED (formerly Compass Housing Services (NZ) Co Ltd) is registered in New Zealand under the Companies Act and as a charity registered with Charities NZ under the Charities Act
HOME in PLACE Group	The corporate structure that includes HOME in PLACE (as the Parent Company) and the boards of Subsidiary Companies, Governance Committees and advisory groups as created from time to time.
Independent contractor	means a party engaged directly by HOME in PLACE pursuant to a contract for services. In the context of workforce engagements, this includes sole traders, companies, or partnerships with whom HOME in PLACE enters into an agreement for the provision of specified individuals to supply specific skills, services, or consultancy arrangements. It does not include individuals engaged through labour hire agencies. Independent contractors are not employees of HOME in PLACE.
Officer	Has the same meaning as defined in the Corporations Act 2001 Part 1.2 Division 1 Section 9 Dictionary in Australia and as defined in the Companies Act 1992 Part 1 Section 2 Interpretation in New Zealand
Parent Board	The current directors of HOME in PLACE.
Parent Company	HOME in PLACE
Stakeholder	person or organisation that can affect, be affected by, or perceive themselves to be affected by a decision or activity, may also be called ‘interested party’.
Subsidiary Boards	The appointed board of directors of a Subsidiary Company.
Subsidiary Company	A company in which HOME in PLACE owns all or at least a majority of the shares.
User	any person or entity that use HOME in PLACE Information or ICT Assets.
QMS	Quality Management System
Worker (HOME in PLACE)	has the same meaning as defined in the NSW Work Health and Safety Act 2011 No 10 Subdivision 2 Part 7 Meaning of ‘worker’ (1) A person is a worker if the person carries out work in any capacity for a person conducting a business or undertaking, including work as: an employee, or an independent contractor or subcontractor, or an employee of a contractor or subcontractor, or an employee of a labour hire company who has been assigned to work in the person’s

Term	Definition
	business or undertaking, or an outworker, or an apprentice or trainee, or a student gaining work experience, or a volunteer, or a person of a prescribed class.
Worker (HOME in PLACE QLD)	is 'a person who works under a contract and, in relation to the work, is an employee for the purpose of assessment for PAYG withholding under the Taxation Administration Act 1953 (Cwlth), schedule 1, part 2-5'. This applies to a person for whom PAYG tax instalments are required or would be required to be withheld by their employer.
Worker (HOME in PLACE VIC)	A worker is defined as an individual who: performs work for an employer or agrees with an employer to perform work at the employer's direction, instruction or request, whether under a contract of employment (whether express, implied, oral or in writing) or otherwise or who is deemed to be a worker by the legislation.

End of document.