

Compass Non-Development Activities Policy

1. Purpose

Compass Housing Services Co Ltd (Compass) is a Not- for -profit and Non-Government International development organisation that promotes social justice and fights poverty and homelessness by working with communities around the world by providing safe, secured and sustainable shelters and build and strengthening sustainable communities and capacities.

One of Compass main international strategy is active engagement with a 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, community base organisation, faith-based organisations and the private sector.

Compass' 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. Compass Housing Services Co Ltd (Compass) 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 Compass 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.

Compass is a Not- for -profit International development organisation that promotes social justice and fights poverty and homelessness by working with communities around the world. Compass 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, Compass partners with local faith-based organisations, that have common mission and values as Compass , 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

Compass Non-Development Policy (Policy) applies to all Compass international development activities. The policy is applicable to all Compass' employees and volunteers. The policy also extends to Compass' partners and associated implementing organisations.

3. Policy Statement

Background

Compass is an International development organisation that promotes social justice and fights poverty by working with communities around the world.

It is 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, Compass 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

Compass 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, secured and sustainable shelters and build and strengthening sustainable communities and capacities.

Definition of Non-Development Activities

Compass 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 specific political party, candidate to gain power or to support organisation 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 Compass’ compliance with the Commitment to accountability to our stakeholders in the ACFID Code of Conduct, Compliance Indicator 7.3.2 which states that Member development initiatives constantly demonstrate the separation of development activities from non-development activities.

To be compliant with this indicator, Compass 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 Compass’ 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

Compass 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

Compass 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.

Compass has procedures to implement the following:

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

- Compass 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

- Compass has guidelines in place that address appropriate reporting on Compass development and humanitarian and non-development activities in organisational promotional materials, such as Compass 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.

Separation of development and humanitarian and non-development in fundraising and provision of choice for donors.

Procedure

- Compass’ 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

- Compass will inform our potential new partners about Compass’ position on support and or funding for non-development activity.
- Compass will issue our potential and current partners a copy of this policy.
- Compass’ Memorandum of Understanding (MoU) or equivalent with potential and current partners will include clear definitions of development and humanitarian activity and non-development activity.
- Compass’ Memorandum of Understanding (MoU) or equivalent will require the potential and current partner to agree that the Compass funds designated for development and humanitarian activities, will not be used to fund any non-development activity.

- In the ongoing communication and liaison between Compass 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:

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

Introduction of Compass 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 Compass’ **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 Compass workers have an obligation to:

- familiarise themselves with and ensure they have a clear understanding of Compass policies and procedures,
- observe and implement such policies, and associated procedures in delivering services to Compass clients,
- inform Compass 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 Compass policies or procedures.

The relevant Group Executive Manager is ultimately responsible to:

- ensure all stakeholders within their area of responsibility are informed about Compass 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 Compass Policy and Procedures to be reported and managed.

5. Implementation and Review

This policy is listed on Compass Controlled Documents Register and is a controlled document requiring approval of any changes. It may not be amended or shared outside Compass without approval.

The policy is reviewed regularly and published on Compass SharePoint intranet once approved. Employees receive communications and training on new and reviewed policies and procedures.

Compass 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 Compass Group Executive Services (governance@compasshousing.org) to maintain and update the Compass 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).

Compass 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.

6. Resources and related documents

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

Related documents

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

Related legislation/standards

- ACFID Code of Conduct: Definitions

7. Definitions

Please refer to Compass 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
Compass	Compass Housing Services Co. Ltd, an Australian Public Company registered in Australia under the Corporations Act 2001 (Cwlth) and as a charity with the Australian Charities and Not-for-profit Commission (ACNC) .
Compass Group	The corporate structure that includes Compass (as the Parent Company) and the boards of Subsidiary Companies, Governance Committees and advisory groups as created from time to time.
Employee	A person engaged under an employment agreement or award by any company in the Compass Group.
Executive Manager	Many positions within Compass 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 Compass Organisational Chart in Terms of Levels of Delegated Authority for confirmation of the band of authority they hold.
Independent contractor	means a party engaged directly by Compass pursuant to a contract for services. In the context of workforce engagements, this includes sole traders, companies, or partnerships with whom Compass 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 Compass.
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
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’.
User	any person or entity that use Compass Information or ICT Assets.
Worker (Compass Group)	a person engaged to carry out activities in any capacity for a company in the Compass Group, including work as: <ul style="list-style-type: none"> • an Employee, or • an independent contractor or subcontractor, or • a worker of a contractor or subcontractor, or • a worker of a labour hire company who has been assigned to work in the person’s business or undertaking, or • an outworker, or • an apprentice or trainee, or • a student gaining work experience, or a volunteer

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