



Separation of Development and Non Development Activities

Mahboba's Promise Whistleblowing Policy

1. Introduction

Mahboba's Promise is committed to ensuring a clear separation between aid and development activities and non-aid and non-development activities, including the promotion of religious adherence and political activity that is understood by all stakeholders and implemented effectively.

2. Purpose

The purpose of this Policy is to ensure that Mahboba's Promise accurately represent our activities to the people we work with, as well as the public, and accurately represent our activities to the people we work with, our donors and the public, and that our objectives are clearly orientated to an aid and development approach, and do not undertake non-development activities.

This Policy addresses our ACFID compliance obligations when communicated 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.

3. Scope of Policy

This Policy is intended to apply to all Mahboba's Promise activities. The Policy is applicable to all Mahboba's Promise employees and volunteers. The Policy also extends to Mahboba's Promise partners and associated implementing organisations.

4. Background

Mahboba's Promise aims to provide effective sustainable overseas development aid to disadvantaged and vulnerable individuals and communities in Afghanistan through the provision of education, sanitation, primary health care, training and agriculture programs.

As part of its compliance with the ACFID Code of Conduct, Mahboba's Promise has committed to ensure that funds and other resources designated for the purpose of aid and development will be used only for those purposes and will not be used to promote a particular religious' adherence or to support a political party, or to promote a candidate or organisation affiliated to political party. In some instances, Mahboba's Promise 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 a candidate.

5. Definitions

Aid and Development Activities means activities undertaken in order to reduce poverty and address social justice, specifically with respect to vulnerable communities in Afghanistan, through projects and education, emergency management, advocacy, volunteering, the provision of technical and professional services and the promotion and protection of human rights. The concept of aid and development activities can be distinguished by the following principles:

- Strengths based approaches which encourage people and communities with self-sustaining solutions;
- Processes that seek to address the causes of poverty and its consequences;
- 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;
- Emergency relief, disaster recovery and meeting the immediate needs of refugees and internally displaced people.

Non-Development Activities means activities that are not Aid and Development Activities. It includes welfare, evangelical and partisan political activities.

Welfare is assistance to maintain individuals in a particular condition of a long-term basis, such as institutionalised care programs provided by orphanages, child sponsorship (that is, funds given directly to children or their families, and not funds drawn from child sponsorship and used for development purposes), hospital care programs, hospices, and costs for the maintenance of structures for institutionalised care programs (for example, schools or orphanages).

Evangelical Activities are those activities that promote a particular 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 or candidate in a local, regional or general / national election or facilitating or supporting a particular politician or faction to gain power within a government or political party structure.

6. Compliance

This policy provides framework for Mahboba's Promise compliance with the Commitment to accountability to our stakeholders in the ACFID Code of Conduct, in particular Compliance Indicator 7.3.2 which states that Members development initiatives constantly demonstrate the separation of development activities from non-development activities.

To be complaint with this indicator, Members are required to have in place:

- Policy, statement or guidance document that addresses the separation of development activities from non-development activities in:
 - Programming.
 - Expenditure reporting.
 - Fundraising.
 - Advocacy campaigns.
 - Communications.
 - Choice for donors.
 - Partners.
- Development initiatives that consistently show evidence of the separation of development and non-development activities.

7. Guiding Principles

Mahboba's Promise supports and is committed to abiding by the following principles:

- To ensure accurate representation of our activities to the people we work with, donor 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.

8. Control Procedures

Mahboba's Promise ensures that we and our partners can differentiate between development and non-development activity and communicate this appropriately stakeholders, donors and the public.

Control Procedures include:

Projects and Programmes

- Appraisals by key members, management and stakeholders of all project proposals to determine whether they include non-aid and development components;
- Appraisers will record any issues, which must then be followed up to ensure that the policy requirements are satisfied before the project is approved.
- Appraisers record any aspects of the project that should be closely monitored 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-development activities, and if so, how it is able to manage and account for them separately to aid and development activity.
- 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, learning and evaluation processes.

Communications and Advocacy Materials

- Guidelines are in place that address appropriate reporting in organisational promotional materials;
- All articles written by overseas project partners or photos supplied by partners for reporting materials are reviewed for differentiation between development and humanitarian and non-development activities;
- Communications materials are reviewed prior to publication to ensure separation of reporting and fundraising for development and humanitarian and non-development activities.

Fundraising and Provision of Choice for Donors

- Fundraising materials will be reviewed prior to publication to ensure that solicitations make a clear distinction between aid and development and non-development activities;
- 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;
- Funds raised non-development activity will be tracked, managed, reported and accounted for separately to those raised for development and humanitarian components.

With Partners

- Communication with new partners will state the Member's position on support for non-development activity;
- Member's partners will receive a copy of this policy;
- The partner agreement Memorandum of Understanding (MoU) or equivalent will include clear definitions of development and humanitarian activity and non-development activity;
- The partner agreement (MoU or equivalent) will require the partner to agree that the Members funds designated for development and humanitarian purposes will not be used to fund any non-development activity;
- Ongoing dialogue between the Member and its partners will reinforce the definitions of development and humanitarian and non-development activity and the need for a separation between development and humanitarian and non-development activity

9 Policy Implementation and Review

- The signatory will review this policy on a regular basis, at least every two years;
- Confirmation of internal compliance with this policy will be undertaken at least once annually;
- Introduction of the policy will be included in the induction process, to be read by all new staff;
- A workshop will be regularly organised to present the policy to staff and keep them updated on any changes.