

- **Burmese Community Development Collaboration (BCDC)**

NON-DEVELOPMENT ACTIVITY POLICY

Version 2.0

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1. INTRODUCTION

The Burmese Community Development Collaboration (BCDC) is committed to upholding the highest standards of integrity, transparency, and accountability in all its operations and partnerships. As a humanitarian and development-focused organization, BCDC recognizes the importance of clearly distinguishing its aid and development work from any non-development activities, including political, religious, or advocacy efforts that fall outside the scope of community development.

This policy has been developed in alignment with the Australian Council for International Development (ACFID) Code of Conduct, specifically the obligations outlined under Commitment 7.3: Separation of Development and Non-Development Activities. It serves as a framework to ensure that BCDC's aid and development activities remain impartial, inclusive, and not influenced by non-development interests or agendas.

This policy articulates the organization's position, sets expectations for staff and partners, and outlines mechanisms to ensure the proper separation, control, and monitoring of development and non-development activities. It reinforces BCDC's dedication to rights-based development and equitable service delivery, free from coercion or conditions related to political or religious affiliation.

2. PURPOSE OF THE POLICY

The purpose of this policy is to ensure that all activities undertaken by the Burmese Community Development Collaboration (BCDC) – whether directly or through partners – are clearly and consistently defined, documented, and communicated as either development or non-development in nature.

This policy aims to:

- Safeguard the integrity of BCDC’s development and humanitarian work by ensuring it is free from any real or perceived association with non-development objectives.
- Comply with ACFID Code of Conduct Commitment 7.3, which requires members to demonstrate clear separation of development and non-development activities in programming, fundraising, financial management, and communications.
- Maintain transparency and trust with donors, stakeholders, and beneficiaries by clearly differentiating between development and non-development initiatives.
- Guide staff and partners in the design, implementation, funding, monitoring, and evaluation of programs to ensure alignment with this policy.
- Prevent any form of coercion or undue influence, such as requiring beneficiaries to participate in religious or political activities as a condition for receiving aid.

Through this policy, BCDC seeks to reinforce its commitment to impartial, inclusive, and ethical development practice, ensuring that aid and services are provided solely based on need, regardless of religious or political belief.

3. SCOPE OF THE POLICY

This policy applies to all BCDC activities, staff, volunteers, partners, donors, and stakeholders involved in the design, implementation, funding, monitoring, and communication of programs. It specifically covers:

3.1 Activities Covered

- **Development Activities** – Programs focused on improving the well-being of communities through education, health, livelihoods, humanitarian aid, aged care, and human rights support. These are governed by the principles of inclusion, participation, sustainability, and transparency.
- **Non-Development Activities** – Includes religious proselytization, political advocacy for partisan purposes, or any other activity not aligned with development or humanitarian objectives.

3.2 Organizational Application

This policy applies to:

- All **BCDC staff, board members, and volunteers**, whether in Australia or overseas.
- **Partner organizations** or sub-contractors working with BCDC or using BCDC funds.
- **BCDC communications and promotional materials**, including websites, reports, fundraising campaigns, and social media.

3.3 Activities Outside the Scope

This policy does not restrict the personal political or religious beliefs or affiliations of individuals associated with BCDC, provided these do not interfere with BCDC's development work or appear to be officially endorsed by the organization.

3.4 Geographic Scope

Applies to all locations where BCDC operates – including Australia, Myanmar, and regional cross-border areas (e.g., Thailand-Myanmar, India-Myanmar).

4. BACKGROUND AND CONTEXT

BCDC operates in diverse cultural, political, and religious environments, both in Australia and internationally. These contexts require a clear and consistent approach to distinguish between **development** and **non-development** activities. This is essential not only for compliance with the **ACFID Code of Conduct** but also to maintain the trust of communities, donors, and partners.

In Myanmar and along its borders, the complex intersection of ethnic, religious, and political identities often influences how aid is perceived. Similarly, in Australia, BCDC serves communities with varied beliefs, languages, and socio-political backgrounds. As a result, there must be clear boundaries and communication to ensure that all activities undertaken, funded, or promoted by BCDC reflect its commitment to non-partisan, rights-based development.

Furthermore, development actors are increasingly held accountable for the neutrality, impartiality, and transparency of their programs. This policy outlines how BCDC prevents the use of development resources for religious or political purposes and ensures that its humanitarian and development efforts remain inclusive, independent, and free from coercion.

5. DEFINITIONS

To ensure clarity and consistency, BCDC adopts the following definitions as aligned with the ACFID Code of Conduct and best practices:

5.1 Development Activities

Development activities are initiatives aimed at improving the long-term well-being, capacity, and rights of individuals and communities. These activities are:

- **People-centered, participatory, and empowering**
- **Focused on sustainability** and capacity-building
- **Non-discriminatory and inclusive**, especially of vulnerable and marginalized groups
- **Rights-based**, supporting equity, justice, and dignity

Examples include:

- Health care and education programs
- Livelihood and skills training
- Humanitarian relief and disaster response
- Protection and support services for displaced populations

5.2 Non-Development Activities

Non-development activities include those that are **primarily religious, political, or ideological in nature**, such as:

- Evangelism, proselytization, or attempts to convert individuals to a specific religion or belief system
- Support for political parties, candidates, or partisan lobbying
- Ceremonial, theological, or doctrinal events not linked to development objectives

5.3 Proselytizing

Proselytizing refers to coercive or manipulative efforts to convert people to a religion or belief. BCDC does not engage in or support proselytizing under any circumstances. All aid and services are provided unconditionally and without religious or political pressure.

5.4 Religious and Cultural Sensitivity

BCDC affirms that religious identity, belief, or practice must not be a condition for participation in or access to services. Respect for cultural and religious diversity is embedded in all our operations.

6. COMPLIANCE WITH ACFID CODE OF CONDUCT

BCDC is committed to full compliance with the **Australian Council for International Development (ACFID) Code of Conduct**, particularly in relation to the clear distinction between **development and non-development activities**.

This policy specifically aligns with the ACFID Code's requirements under:

- **Commitment 7.3:** "We communicate truthfully and ethically."
- **Commitment 8.1:** "We advance the safeguarding of people."
- **Commitment 8.2:** "We protect and promote the rights of children."
- **Commitment 9.1:** "We are not-for-profit and formed for a defined development and/or humanitarian purpose."

Key Areas of Compliance:

- **Transparency in Communications:** BCDC ensures that all public materials, including promotional, fundraising, and programmatic content, accurately represent our work and clearly distinguish between development and non-development activities.
- **Non-Development Activities Separation:** Any non-development activity (e.g., religious or political events) is conducted outside the scope of donor-funded programs and is clearly identified as separate in all documentation and practice.
- **Safeguards in Partner Agreements:** All Memorandums of Understanding (MoUs), partnership agreements, and contracts explicitly state the commitment to non-discrimination, non-proselytization, and compliance with the ACFID Code.
- **Annual Review and Self-Assessment:** BCDC regularly reviews its policies and activities through internal audits and self-assessment against ACFID Code obligations to ensure continuous compliance.
- **Staff and Volunteer Training:** All BCDC personnel are trained to understand the requirements of the ACFID Code and how they apply to communications, fundraising, and service delivery.

By complying with these standards, BCDC affirms its accountability to stakeholders, donors, and partner communities, and its commitment to ethical and transparent development practice.

7. GUIDING PRINCIPLES

The Burmese Community Development Collaboration (BCDC) upholds the following guiding principles to ensure ethical, transparent, and inclusive practice when distinguishing between development and non-development activities:

7.1 Integrity and Transparency

BCDC is committed to honest and accurate communication. We will always represent our work truthfully, and ensure that development activities are not misrepresented as supporting any non-development agendas. This includes clarity in:

- Program descriptions
- Fundraising appeals
- Public materials and reports

7.2 Respect for Rights and Beliefs

BCDC fully respects the diversity of religious, political, and cultural beliefs of individuals and communities. Our development work:

- Is conducted without coercion or proselytization
- Does not advance political or religious objectives
- Ensures participation without discrimination

7.3 Accountability to Stakeholders

We are accountable to communities, donors, and partners. BCDC will:

- Clearly distinguish development and non-development activities in communications
- Establish systems to prevent the misuse of development funds for non-development purposes
- Monitor compliance and take corrective action when required

7.4 Voluntary Participation

All participation in development activities is voluntary, inclusive, and based on free and informed consent. Services, support, or benefits are never conditional upon participation in any religious or political activity.

7.5 Clarity in Partner and Stakeholder Engagement

BCDC ensures all implementing partners:

- Are aware of this policy and our obligations under the ACFID Code of Conduct
- Sign partnership agreements that define the separation of activities
- Undertake programs that are consistent with our non-discrimination principles

7.6 Commitment to the ACFID Code of Conduct

All BCDC activities are aligned with the ACFID Code, particularly:

- Promoting truthful, respectful, and ethical communication
- Distinguishing between development and non-development activities
- Respecting and protecting the rights of all people we work with

8. SEPARATION OF DEVELOPMENT AND NON-DEVELOPMENT ACTIVITIES

The Burmese Community Development Collaboration (BCDC) is committed to clearly distinguishing between development and non-development activities in its planning, budgeting, communication, implementation, and reporting. This separation ensures transparency, upholds community trust, and complies with the ACFID Code of Conduct, particularly **Commitment 7.3: Separation of Development and Non-Development Activities**.

8.1 Definitions

- **Development activities** are defined as initiatives aimed at reducing poverty and improving the well-being and dignity of people on the basis of universal human rights. This includes humanitarian relief, sustainable development, and empowerment programs.
- **Non-development activities** include religious or political activities that are intended to promote a particular faith or political view, welfare services that do not empower participants, or activities not aligned with principles of inclusivity and rights-based development.

8.2 Commitment to Separation

BCDC does not use development funds for non-development purposes. Where non-development activities are undertaken, BCDC ensures:

- They are clearly separated in **design and implementation** from development initiatives.
- They are **separately funded** and **distinctly reported**.
- **Participation** in any non-development activity is **voluntary and based on informed consent**.
- All **communications** about BCDC's programs distinguish development from non-development content.

8.3 Financial and Operational Separation

BCDC ensures a clear separation between development and non-development activities in both financial management and operational practice. The organization maintains this separation through:

- Separate budgeting and accounting systems for development and non-development activities
- Distinct fundraising appeals with clear and public communication on how raised funds will be used
- Independent decision-making processes, where applicable—particularly when working with partners engaged in both types of activities
- Clear documentation of income, expenditures, donor conditions, and reporting lines for each activity stream

To strengthen transparency and accountability, BCDC also applies the following internal financial controls across all activities:

- A **dual-signature authorization** is required for all bank transactions, ensuring that no single individual can approve or disburse funds independently
- Segregation of duties in financial approvals, budgeting, and reporting
- Project-specific financial coding to ensure accurate fund allocation and traceability
- Routine reconciliation, audit trails, and periodic financial reviews

If financial discrepancies, misclassification of funds, or suspected misuse arise, BCDC will initiate a formal review in line with its **Financial Wrongdoing Policy**, including the application of **Anti-Money Laundering (AML) procedures** as outlined in Section 9.6 of that policy.

8.4 Communication and Public Representation

All public materials—such as websites, flyers, program reports, and social media—are reviewed to ensure that:

- Development activities are **not represented as religious or political promotion**.
- **Transparency is maintained** in describing the nature of activities, sources of funding, and intended outcomes.
- Any reference to non-development work is clearly distinguished, with disclaimers where needed.

8.5 Partner Engagement

- Regular **internal audits** and **program reviews** assess compliance with separation principles.
- Any breach or confusion identified between development and non-development activities will be **promptly addressed**, and corrective actions will be taken.
- Findings related to separation issues are reported to the **Executive Team and Board of Directors**, and documented for learning and policy improvement.

8.6 Monitoring and Accountability

BCDC works with partners who share its commitment to upholding the separation of development and non-development activities. This includes:

- Incorporating this requirement into **partnership agreements and MOUs**.
- **Reviewing partner communications, program materials, and financial reports** to ensure alignment.
- Providing **capacity building** to partners where required, to support compliance.

9. APPLICATION OF POLICY TO PARTNERS

BCDC recognizes that partnerships are integral to the effective delivery of its development and humanitarian programs. To uphold the standards set out in this policy, BCDC ensures that all implementing and collaborative partners understand, agree to, and comply with the organization's commitment to the separation of development and non-development activities.

9.1 Partner Due Diligence and Assessment

Before entering into any partnership agreement, BCDC conducts a due diligence assessment that includes:

- Reviewing the partner's organizational mission and activities to ensure alignment with BCDC's development objectives.
- Verifying that the partner understands the distinction between development and non-development activities.
- Ensuring that the partner has its own relevant policies or agrees to operate under BCDC's policies on separation of development and non-development activities.

9.2 Partnership Agreements

All formal partnership agreements and MOUs with partners must:

- Clearly state that funds, resources, and branding associated with BCDC are to be used solely for development or humanitarian purposes.
- Include clauses that prohibit the use of BCDC funds for non-development activities (e.g., political campaigning or religious proselytization).
- Reference this Non-Development Activity Policy as a binding condition of collaboration.

9.3 Monitoring and Compliance

BCDC monitors partner activities through:

- Regular reporting and financial acquittals, ensuring all expenses are aligned with approved development objectives.
- Site visits and progress reviews, where feasible, to verify that activities are being implemented in line with agreed terms.
- Random audits or independent reviews for higher-risk projects or new partnerships.

9.4 Capacity Strengthening

BCDC provides support to partners to build their capacity in maintaining the separation of development and non-development activities. This may include:

- Training and awareness sessions on the ACFID Code of Conduct.
- Support in developing internal policies or adapting BCDC's policy for local use.
- Clarifying expectations around branding, messaging, and community engagement.

9.5 Addressing Non-Compliance

Where a breach of this policy by a partner is identified, BCDC will:

- Investigate the matter promptly and transparently.
- Require corrective actions and support remedial measures.
- Suspend funding or terminate the partnership in cases of serious or repeated non-compliance.

10. PUBLIC COMMUNICATIONS AND FUNDRAISING MATERIALS

BCDC maintains an active and transparent public presence through its official website, publications, community events, and social media platforms. These communications reflect the full spectrum of BCDC’s work—including development programs, aged care services (such as the Garden View initiative), and community-based non-development activities. As a community-led organization, BCDC takes care to uphold clarity, consistency, and accountability in how its work is publicly represented, especially when communicating with supporters, donors, and stakeholders.

10.1 Consistent and Accurate Representation

- All BCDC public communications—including those related to aged care, refugee support, language programs, or community events—are presented in a unified voice while clearly identifying their nature.
- BCDC’s official website and materials ensure that development-focused programs (e.g. humanitarian aid, vocational education, refugee settlement support) are distinguishable from non-development activities (e.g. cultural celebrations or advocacy events) in context and description, without requiring artificial separation.

10.2 Public Fundraising and Appeals

- BCDC conducts public fundraising for a variety of programs through both formal campaigns and community-led efforts.
- Where fundraising involves both development and non-development activities, the purpose of the funds is clearly described.
- When funds are directed solely toward development objectives (e.g. emergency relief in Myanmar, refugee support in Australia), this is explicitly stated in fundraising appeals and reports.

10.3 Ethical Storytelling and Community Representation

- BCDC places high importance on dignity and accuracy in all visual and narrative representations of individuals, especially when stories relate to vulnerable populations such as refugees, IDPs, or aged care residents.
- All photos and testimonials used in communications are based on informed consent, and BCDC avoids sensationalism or exploitative storytelling.
- Community members, including children and elders, are portrayed respectfully, with an emphasis on empowerment, resilience, and cultural pride.

10.4 Internal Oversight and Public Assurance

- All public communications and fundraising materials are reviewed by the relevant program or communications lead before release.
- Staff and volunteers are trained to distinguish between development and non-development messaging, while ensuring that no materials misrepresent the intent or impact of BCDC's work.
- BCDC welcomes public inquiries about its programs and funding use, and maintains open channels of communication to respond to such queries with transparency.

11. MONITORING, EVALUATION, AND CONTINUOUS IMPROVEMENT

BCDC is committed to regularly monitoring and evaluating its practices to ensure that development and non-development activities remain clearly separated, appropriately managed, and transparently communicated. This process supports continuous learning, quality improvement, and accountability to stakeholders, beneficiaries, and funding partners.

11.1 Monitoring of Implementation

- BCDC’s senior management team will oversee the routine monitoring of communications, fundraising, and program documents to ensure compliance with this policy.
- Program teams are responsible for documenting the nature of activities (development or non-development) at the planning and reporting stages to ensure consistency and compliance.

11.2 Evaluation and Policy Review

- An internal review of this policy will be conducted **at least every two years**, or earlier if:
 - There are substantial changes to ACFID Code of Conduct requirements;
 - New program types or partnerships are introduced;
 - A compliance concern or breach has been identified.
- Evaluation findings will inform updates to BCDC’s procedures and staff training.

11.3 Continuous Improvement

- Lessons learned through program delivery, audits, and stakeholder feedback will be incorporated into improved control measures.
- BCDC encourages open dialogue among staff and volunteers to identify and resolve any gaps in the implementation of this policy.
- When gaps or misunderstandings are identified—especially in partner communications or externally led fundraising—clarifying guidance will be issued.

11.4 Reporting and Accountability

- Any potential breaches or confusion regarding the distinction between development and non-development activities must be reported to the CEO or delegated policy compliance officer.
- Where relevant, corrective actions will be taken promptly and transparently, with documentation maintained for accountability.

11.5 Financial Oversight and Alignment with Related Policies

- BCDC enforces its Financial Wrongdoing Policy across all operations to ensure integrity in financial management, including the separation of development and non-development funds.
- All financial transactions are subject to internal controls, including dual-signature authorisation, delegated approval thresholds, and project-specific reconciliation procedures.
- Where financial discrepancies, misclassification, or irregularities are identified, investigations will be initiated in accordance with the Financial Wrongdoing Policy.
- Anti-Money Laundering (AML) procedures will also be applied, as outlined in Section 9.6 of the Financial Wrongdoing Policy, to detect and respond to any suspicious activity or fund misuse.
- These measures reinforce BCDC’s commitment to transparency, donor accountability, and compliance with both internal policy and relevant financial regulations.

12. CONCLUSION

The BCDC **Development and Non-Development Activities** Policy affirms the organization’s unwavering commitment to transparency, accountability, and ethical integrity in all aspects of its programming. By clearly distinguishing between development and non-development activities, BCDC upholds the standards of the ACFID Code of Conduct and ensures that all stakeholders—including donors, beneficiaries, and the broader community—can trust the integrity of its operations.

This policy is not merely a compliance requirement, but a core component of BCDC’s values-driven approach to inclusive community development. It reflects our responsibility to accurately communicate the purpose of all activities, manage resources with care, and respect the diverse beliefs and needs of the communities we serve in both Australia and Myanmar.

As BCDC continues to grow and engage with new partners and sectors, this policy will guide all staff, volunteers, and representatives in maintaining a clear and consistent separation between development and non-development initiatives, ensuring our work remains principled, focused, and impactful.

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