1. PURPOSE

1.1 The purpose of this policy is to guide WWF’s daily operations in accordance with WWF-Australia’s Constitution:

‘... [WWF-Australia] must not: (i) engage in, fund or otherwise support any activity that is directed towards evangelism, the promotion of religious or political causes or political parties, or the provision of human welfare ...’

And to satisfy the requirements of the Department of Foreign Affairs & Trade (DFAT), Australian Council for International Development (ACFID) and Fundraising Institute of Australia (FIA) that funds and resources raised for Aid and Development purposes are used exclusively for such purposes, are not used to exploit people and communities that are vulnerable, and that conditions or obligations are not placed on recipients in terms of non-development, religious and political outcomes.

2. BACKGROUND

2.1 WWF-Australia is part of the global WWF conservation organisation. By its (global) Code of Ethics, WWF is required to be independent, multicultural and non-party political, to involve local communities and indigenous peoples in the planning and execution of programmes, and to respect their cultural and economic needs, and to run WWF operations in a responsible and cost-effective manner, and apply donors’ funds according to the highest standards of accountability and transparency.

2.2 DFAT requires all accredited NGOs to have appraisal processes in place to ensure that international activities supported by the Australian Government and funding disbursements classified as ‘Recognised Development Expenditure’ are consistent with the NGO’s overall development priorities and strategies and reflect key development principles. Specifically, DFAT requires the exclusion of welfare, evangelistic and political activities as these are not ‘in accordance with the development intentions of the aid program.’

2.3 WWF-Australia is a signatory to the ACFID’s Code of Conduct (June 2017) which requires members to ‘consistently demonstrate separation of development activities from non-development activities’ (Compliance Indicator 7.3.2)

2.4 WWF-Australia is a member of the Fundraising Institute of Australia (FIA) whose ‘Standard of Overseas Aid Fundraising Practice’, is to a similar effect.

3. POLICY

3.1. Funds and other resources raised by or provided to WWF for the purpose of Aid and Development (defined below) must only be used for the purpose of Aid and Development.

3.2. Funds and other resources disbursed or used by WWF which were designated as being for the purpose of Aid and Development must only be used for the purpose of Aid and Development.

3.3. WWF-Australia must not fund or otherwise support any activity that is directed towards:

- Evangelism and/or Evangelism, Proselytism and Missionary Work (defined below);
- The promotion of religious or political causes or political parties;
- Partisan Political Activities (defined below);
- The provision of human welfare and/or Welfare Activities (defined below).

3.4. Organisations implementing Aid and Development Activities funded by, or through, WWF-Australia (Partner Organisations – defined below), must use the funds and/or resources only for (a) the purpose of Aid and Development and (b) the particular Aid and Development Activities for which the funding/resources were provided.

3.5. Partner Organisations must not fund or otherwise support any activity that is directed towards:

- Evangelism and/or Evangelism, Proselytism and Missionary Work;
- The promotion of religious or political causes or political parties;
- Partisan Political Activities;
- The provision of human welfare and/or Welfare Activities.

3.6. Board members, staff, volunteers and contractors of WWF-Australia and of Partner Organisations must not – in the course of their work – undertake or participate in:

- Evangelism and/or Evangelism, Proselytism and Missionary Work;
- The promotion of religious or political causes or political parties;
- Partisan Political Activities;
- The provision of human welfare and/or Welfare Activities.

3.7. If – in their own time – board members, staff, volunteers and contractors of WWF-Australia or Partner Organisations undertake or participate in:

- Evangelism and/or Evangelism, Proselytism and Missionary Work;
- The promotion of religious or political causes or political parties;
- Partisan Political Activities;
- The provision of human welfare and/or Welfare Activities,

They must ensure that their activities:

- Are not perceived or viewed as being on behalf of WWF;
• Are not perceived or viewed as being representative of the views of WWF;

• Do not use WWF logo, WWF funds or WWF buildings or land, computers, email systems, websites, cars or trucks or other vehicles, mobile phones, stationery or other office supplies or any other resources of WWF;

• Do not use buildings or land, computers, email systems, websites, cars or trucks or other vehicles, mobile phones, stationery or other office supplies or any other resources provided to implement Aid and Development Activities funded by, or through, WWF-Australia;

• Particular care must be taken of personal views expressed on Facebook, Twitter, other social media platforms, and in emails.

4. SOURCES OF AUTHORITY

4.1. Federal Legislation:

• Anti-Money Laundering/Counter Terrorism Financing Act 2006;

• Charter of the United Nations Act 1945;

• Competition and Consumer Act 2010;

• Criminal Code Act 1995;

• Financial Management and Accountability Act 1997;

• Spam Act 2003;

• Privacy Act 1988 (and the National Privacy Principles).

4.2. State Legislation:

Australian Capital Territory

• Associations Incorporation Act 1991;

New South Wales

• NSW Charitable Fundraising Act 1991;

Northern Territory

• Financial Institutions Duty Act 1989;

Queensland

• Associations Incorporation Act 1981;

• Charities Funds Act 1958;

South Australia
• Charitable Trusts Procedure Act 1922;

Tasmania
• Associations Incorporation Act 1964;
• Variation of Trusts Act 1994;

Victoria
• Associations Incorporation Act 1981;
• Charities Act 1978;

WA
• Charitable Collections Act 1946;
• Charitable Trusts Act 1962.

4.3. WWF

• WWF-Australia Constitution;
• WWF-Australia Code of Ethical Conduct;
• WWF [International] Code of Ethics;
• WWF-Australia Advocacy with Excellence.

4.4. Department of Foreign Affairs and Trade Australian NGO Accreditation Guidance Manual (October 2016)

4.5. Australian Council for International Development

• ACFID Code of Conduct.
  • Quality Principle 7 – Commitment 3 (accountability to stakeholders)


5. SCOPE

5.1 This policy applies to all WWF-Australia board members, staff, interns, volunteers and contractors.

5.2 This policy applies to all Partner Organisations and their board members, staff, volunteers and contractors implementing Aid and Development activities funded by, or through, WWF-Australia.
6. **DEFINITIONS**

**Aid and Development Activities:**
Activities to reduce poverty and address issues of global justice through community projects and education, emergency management, advocacy, volunteering, the provision of technical and professional services and/or resources, environmental protection and/or restoration, and promotion and protection of human rights.

**Development:**
Development seeks to improve the conditions of communities in a sustainable way. It is based on working with communities rather than on behalf of communities to break the cycle of poverty and dependence so that their fundamental needs are met and the quality of their life enhanced. Development activities seek to address the root causes of the need identified and in doing so make a contribution to reducing that need in the long term.

**Evangelism (also called Proselytism and Missionary Work) Activities:**
Any activity or practice associated with the promotion of a particular religious adherence or attempts to convert people from one religion, faith and/or denominational affiliation to another. Though the words are of Christian origin they can also refer to other religions’ attempts to convert people to their religion, faith or denomination. Evangelistic activities may include discrimination on the basis of belonging or not belonging to a particular religion, faith or denomination and/or attempts to persuade or develop religious beliefs and faith practices among project beneficiaries.

**Non-Development Activities:**
Activities that are not Aid and Development Activities.

**Partisan Political Activities:**
Are political, lobbying or advocacy activities carried out for the sake of or in support of a particular political party, faction within a political party, candidate for public office or organisation affiliated with a political party or candidate for public office.

**Partner Organisations:**
Organisations implementing programs or projects funded by, or through, WWF-Australia.

**Welfare Activities:**
Activities which provide direct assistance to individuals because of a need. Welfare activities generally address immediate needs rather than their root causes.

A simple example of welfare is the delivery of a food package to a poor family. This type of assistance obviously alleviates the family’s immediate need for food. It does not, however, change the long-term circumstances of the family.

7. **RESPONSIBILITIES**

7.1. **Executive Management** are responsible for:

- Ensuring that WWF-Australia and all staff members, volunteers and contractors comply with all relevant legislation and WWF-Australia policies (including this one).
- Ensuring that all Partner Organisations and their board members, staff members, volunteers and contractors implementing Aid and Development activities funded by, or through, WWF-Australia, comply with all relevant legislation and WWF-Australia policies (including this one).

7.2. People & Culture are responsible for:

- Assisting managers and supervisors with the construction of appropriate training and development programs, designed to aid compliance with this policy.

- Providing managers and supervisors and other staff members with support and assistance during any complaint or dismissal process.

7.3. Managers and supervisors are responsible for:

- Ensuring that they comply with all relevant legislation and WWF-Australia policies.

- Communicating this Policy to all Partner Organisations, and ensuring that Partner Organisations communicate this Policy to their board members, staff, interns, volunteers and contractors implementing Aid and Development Activities funded by, or through, WWF-Australia.

- Approving activities and/or funding only when the requirements of this Policy have been met.

- Providing the CEO and People & Culture Director with all information that relates to breaches or potential breaches of this policy.

- Seeking support and assistance from People & Organisation Development as required.

7.4. All employees and volunteers are responsible for:

- Complying with this Policy, as required by the following procedures.

8. PROCEDURES

8.1. This Policy will be included in all contracts and memorandums of understanding with Partner Organisations.

8.2. No later than November of each financial year, WWF-Australia will organise an induction/workshop – which may be held either face-to-face or by Skype or phone conference – at which this Policy, its importance and consequences of non-compliance, will be presented to the Partner Organisation’s executive and relevant staff, volunteers and contractors.
8.3. All Aid and Development Activities funded by or through WWF-Australia and Partner Organisations and relevant staff, volunteers and contractors will be monitored to ensure they are not in breach of this Policy. Monitoring will be proportionate to the amount of funding and the risk of breach (as a result of the funded activities, organisation or skills and experience of board and staff) and will be recorded in the program/project file and signed by the relevant program/project manager. Monitoring will consistent of not less than one country visit annually by an officer or representative of WWF-Australia at which this Policy will be made the subject of special presentation.

8.4. This distinction between funds and/or resources used for Aid and Development Activities and Non-Development Activities will be maintained at all times including in all fundraising, programs, projects, public communications and annual and other reporting.

8.5. Any fundraising activities that include references to both Aid and Development Activities and Non-Development Activities will provide donors with the choice of contributing to Aid and Development activity only.

8.6. WWF will ensure that any such separation in fundraising, programs, projects, public communication and reporting extends to Partner Organisations and is documented. The intention of this Policy is not to restrict the activities or to judge their values.

8.7. If funds are disbursed overseas for welfare, evangelistic or political activities they will be shown as a deduction in the DFAT recognised development expenditure (RDE) report (Line 5(a)) as they are not in accordance with the development intentions of the aid program. WWF will keep clearly documented records of the basis of this assessment.

8.8. Applying this Policy may be difficult in some situations and sound judgement will be necessary. The Policy cannot provide a specific response for every circumstance. WWF will apply the spirit and intent of this clause in the conduct of Aid and Development Activities.

8.9. If this Policy does not provide a clear answer on how to comply in a particular circumstance, WWF will document clearly the decisions made and the reasons behind them and make them available to both recipients and donors.

8.10. Feedback is important to WWF and our Partner Organisations as it encourages improvement. Therefore, all feedback is welcomed. Feedback will be directed to the relevant department of WWF-Australia for action. A complainant regarding an alleged breach of ACFID Code of Conduct can be made directly to ACFID.

9. CONFIDENTIALITY AND DOCUMENT CONTROL

9.1. This Policy is available on Wiki Habitat for all employees.

9.2. This policy will be placed on the WWF-Australia website.

9.3. A copy of the Policy will be provided to any person or organisation on request.
10. APPROVAL

Name: Dermot O’Gorman
Title: CEO
Date of Issue: 20 August 2012
Revised: 17-04-2018