

International Health Transparency and Separation of Development and Non-development Activity

Guideline

1. Purpose

The purpose of this guideline is to be explicit about the separation of development from non-development activities conducted by St John of God International Health (SJGIH).

SJGIH does not conduct aid activities, nor non-development activities, which include: evangelical or missionary activities, political partisanship or campaigning activities, fundraising, lobbying or advocacy campaigns, or welfare activities.

SJGIH is committed to pursuing its development objectives in line with best practice and to accurately, ethically and transparently representing our activities to our stakeholders, partners and the public.

2. Scope

This document applies to all SJGIH caregivers.

3. Guideline

- 3.1. SJGIH commits to the separation of development and non-development activities using the following principles:
 - 3.1.1. As a Catholic organisation, SJGIH will promote and ensure the St John of God Health Care (SJGHC) Vision, Mission and Values underpin its work, including upholding the dignity of all persons, but which does not include evangelical or missionary activities;
 - 3.1.2. Where requested, SJGIH will continue to support stakeholders and partners to promote their own Vision, Mission and Values as a critical component of good governance;
 - 3.1.3. Engagement and agreements with development partners will require partners to agree that SJGIH funds are designated for development activities only, and will not include non-development activities;

- 3.1.4. SJGIH communications will explicitly outline any non-development activities should we choose to engage in such activities in all public documents and on our [website](#);
- 3.1.5. SJGIH will not accept donations intended for non-development activities, and where donations are received they will be applied only to development activities;
- 3.1.6. Where Recognised Development Expenditure (RDE) is allocated to development activities, all funds without exception will be used for those purposes;
- 3.1.7. All non-RDE funds and other resources designated for the purpose of development activities will:
- Be used only for their intended purposes;
 - Not be used to place any conditions or obligations on recipients in terms of non-development activities;
 - Be outlined for stakeholders and partners to ensure their awareness of SJGIH's obligations for expenditure on development programs;
 - Be reported in terms of expenditure separate to non-development activity costs;
- 3.1.8. SJGIH will involve stakeholders and partners to the maximum extent possible in the design, implementation and evaluation of projects and programs to ensure they clearly represent development activities;
- 3.1.9. SJGIH will work with incumbent governments and their representatives regardless of their political affiliation;
- 3.2. SJGIH commits to appropriate, transparent and timely provision of information:
- 3.2.1. SJGIH will, in collaboration with stakeholders and partners, report data that demonstrates progress against development activity goals and objectives to our primary stakeholders:
- SJGHC as the primary funder of SJGIH program;
 - Relevant government ministries and departments where agreements exist;
 - Relevant funding organisations;
- 3.2.2. All data generated in relation to SJGIH programs will be:
- Maintained confidentially in SJGIH systems, and, where appropriate, in local government systems;

- Collected only after program participants have had an opportunity to read the SJGIH Data Collection Statement (Appendix A);
 - De-identified, other than for the purpose of recording individual learning achievements by their employers, information about which is included in the SJGIH Data Collection Statement;
 - Aggregated for the purposes of reporting;
 - Disaggregated for the purposes of gender and disability inclusion;
- 3.2.3. SJGIH will not release information, including in public websites, about individual program participants or beneficiaries except where their employers have requested this information, and only when those participants have had an opportunity to read and acknowledge the SJGIH Data Collection Statement;
- 3.2.4. All SJGIH caregivers will maintain the privacy and confidentiality of individual participants and beneficiaries;
- 3.2.5. SJGHC, as the parent organisation, shares on its website:
- Annual Reports, including:
 - Governance structure, Board and Trustee members;
 - Progress against strategy;
 - Financial commitments to Social Responsibility;
 - Revenue and Earnings Before Interest , Tax, Depreciation and Amortisation (EBITDA);
 - Legal status;
 - Privacy information;
 - Whistleblowing policy;
 - Environmental sustainability statement;
- 3.2.6. Requests for information, complaints or feedback can be made to:
- SJGIH through direct letter to our representatives in-country or via email to international.health@sjog.org.au, which is published on the SJGIH website;
 - Via the SJGHC [feedback](#) form on the website;
- 3.2.7. Information that is to be made public as required by the Australian Council for International Development (ACFID) or the Australian government Department of Foreign Affairs and Trade (DFAT) will be made public as specified by these organisations.

4. Dictionary

Term	Meaning for the purposes of this document
Beneficiary	The recipients of the benefits of the development activities; the people who benefit.
Caregiver	An employee of SJGHC, or any of its subsidiaries
Data	Facts and statistics collected together for reference or analysis. The term 'data' is interchangeable with 'information'.
Disaggregation of data	The division or breaking up into constituent parts, particularly the analytic disassembly of categories which have been aggregated or lumped together. Disaggregating data is important to reveal patterns that can be masked by larger, aggregate data. Looking specifically at sub-populations can help make sure that resources are spent on the areas where they are most needed and can have the biggest impact. Note that DFAT requires all program funding recipients (at a minimum) to record the gender, age group and disability status of program participants and beneficiaries.
Non-development activities	Non-development activities include evangelical or missionary activities; political partisanship or campaigning activities; fundraising; lobbying or advocacy campaigns; welfare activities
Recognised Development Expenditure (RDE)	RDE is the annual eligible expenditure of a Non-Government Organisation (NGO) using contributions from the Australian community. Eligible expenditure is for the NGO's own development assistance, emergency relief or rehabilitation activities overseas and development education in Australia. Eligible contributions include donations of cash, gifts-in-kind and volunteer services. Up to half of the RDE can be from eligible gifts-in-kind and/or eligible volunteer services.

Term	Meaning for the purposes of this document
Transparent	To share your thoughts and opinions honestly and respectfully.

5. Accountabilities

Activity	Accountable position
Communication	Director International Health
Monitoring	Director International Health
Review	Director International Health

6. Related and supporting documents

6.1. Legislation

- (a) Nil

6.2. Related SJGHC policy or document

- (a) GO GRC0005 Conflicts of Interest Policy
 (b) SV SO 4401 Financial Wrongdoing Policy
 (c) GO GRC0010 Privacy Compliance Policy

7. Current and previous versions

Version number	Owner	Approver	Date approved
1.0	Director, IH	Director, IH	24/3/22

8. Appendices

A: Data Collection Statement

Appendix A: Data Collection Statement

International Health Data Collection Information for Participants in Development Activities



Statement

1. Why does St John of God International Health Collect Data?

St John of God International Health (SJGIH) works in conjunction with the Timorese Ministry of Health (MOH) to support Timor-Leste to improve its health systems and provide best practice care for patients. It does this by developing the capacity of staff and healthcare providers. The collection of data allows the MOH and us to monitor the progress and success of our programs, and to make improvements when they are needed.

2. Some of Our Activities Include:

- Mandatory competency training in HNGV, Municipal Referral Hospitals and other health facilities
- Mentoring in clinical areas
- Hospital audits
- Patient and Staff satisfaction surveys
- Testing of nursing and midwifery skills and procedures

3. The Data We Collect Includes:

- Attendance records
- Pre- and post-test results
- Learning and competency assessment results
- Questionnaire and survey results
- Audit results
- Documents and records
- Interview responses
- Group discussion and focus group responses
- Observation records

4. What Is In It For Me?

The data collected from our work in Timor-Leste is important to support the improvement of our programs. By contributing your data, you will help improve health systems and patient care across Timor-Leste.

5. Confidentiality, Sharing and Storage of Data

Any data collected will remain confidential to SJGIH and the MOH. All data contained in public reports and presentations will be aggregated and will **not** identify individual participants' results. Both SJGIH and the MOH may use individual participants' data to review and improve programs, and to maintain records of the learning of individual MOH employees. Data will be stored electronically in a secure server within the Timor-Leste office of SJG Outreach Services and in the MOH human resource management systems.

6. Further information

If you have any questions or would like further information about how we use data from our programs please write to international.health@sjog.org.au.

Our Mission is to continue the healing mission of Jesus