

POLICY

ETHICAL STANDARDS

OVERVIEW

Our ethical standards inform all our relationships with individuals or organisations who provide support for our work through partnerships or financial relationships and transactions.

The SeeBeyondBorders Australia Board is responsible for approving our Ethical Standards, and ensuring that the policy is being effectively applied. In doing so, the Board seeks to optimise support for our work while protecting the organisation's reputation.

As far as possible standards will be applied to other countries where SeeBeyondBorders operates as a separate legal entity and differences due to local laws or customs are identified if applicable in accompanying signature pages signifying the adoption of these standards by other SeeBeyondBorders Boards.

ETHICAL STANDARDS

We have two non-negotiable ethical standards:

Ethical Standard 1: SeeBeyondBorders will not accept funds from an individual or organisation whose work or activities undermine our efforts to alleviate poverty and promote the rights to education and human dignity. This includes but is not limited to corporations whose material business is the production or distribution of weapons; pornography; tobacco; gambling or alcohol, and/or are exploitative of child labour practices in any aspects of their production or distribution.

Ethical Standard 2: SeeBeyondBorders will not enter into a relationship with an individual or organisation that poses a risk to our reputation which could lead to loss of support and/or credibility. We apply a risk management approach to our decision-making using these standards.

For the sake of clarity, it is deemed that anyone engaged in fraudulent, terrorism, or money laundering activities will automatically be excluded from any business with SeeBeyondBorders by either and both Ethical Standards. We will also comply with our reporting obligations as contained in the respective Policy on these activities.

ETHICAL POLICY

The following policy will also apply:

General

1. The SeeBeyondBorders Australia Board is responsible for setting the standards to ensure that there is a consistent approach applied to decision-making across SeeBeyondBorders globally, and that when considering partnerships, financial relationships and transactions with individuals or organisations, the Ethical Standards are applied and used.
2. An analysis of opportunities and risks is required prior to any engagement with potential individual supporters or organisations and consideration must be given to SeeBeyondBorders' Ethical Standards using the Risk Assessment form as attached.
3. Donations are refused if acceptance would contravene Ethical Standard 1 or Ethical Standard 2.
4. The merits of financial engagement will be considered on a case by case basis and the Chief Executive will use the Ethical Standards Policy to ensure a consistent approach.

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5. Should there be a significant risk as identified in the risk management process, the Chief Executive should consider convening the Ethical Guidance committee to discuss the ramifications of working with, or being associated with, a given Individual, organization, activity or product (see also section 11). The committee will consist of a member of the Fundraising team, the Communications Manager, a member of the Advisory Committee and a member of the Board together with the Chief Executive. External assistance may be sought by the committee from time to time.

Anonymous Donations

6. If and when we receive donations anonymously, reasonable steps need to be taken to ensure that the donations comply with our Ethical Standards Policy.
7. In the UK the source of any donations of £25,000 or more from a single donor must be verifiable to comply with guidance of Charity Commission in England and Wales.

Non-financial engagements

8. In cases where SeeBeyondBorders considers a corporation's practice to be inherently harmful or where its products may be objectionable, we will only engage to advocate or advise for improved corporate practices. In these cases, we will not undertake co-branding; cause-related marketing; event sponsorship; TV or radio advertising; or website collaboration. In such circumstances, a risk assessment would be carried out to assess the risk against Ethical Standard 2 and a position agreed to allow this to be communicated clearly.
9. The merits of such an engagement will be considered on a case by case basis and the Chief Executive will use the Ethical Standards Policy to ensure a consistent approach and may call on the Ethical Guidance committee.

Endorsements and Use of Logos

10. SeeBeyondBorders will not permit the use of funder logos, names or other identifying marks to be placed permanently on community-owned infrastructure (e.g. school buildings or facilities).
11. SeeBeyondBorders welcomes supporters using their connection with us in their own communications, as long as this has been formally approved by SeeBeyondBorders and similarly we will promote the support we receive from our donors to our supporter base within the content of this policy.
12. Where funders seek a public association with SeeBeyondBorders to enhance their own brand or reputation, we will enter into a partnership if its value brings significant net gain to us in achieving our mission and does not contravene the Ethical Standards.
13. SeeBeyondBorders will not explicitly approve or endorse its donors' products or services. We will seek to acknowledge our formal partners and the appropriate approach and the specifics will be agreed prior to the partnership commencing on a case by case basis. This may include allowing donors engaged in a formal partnership to use our logo on their products, as long as the product does not contravene our ethical standards.
14. SeeBeyondBorders will enter mutually beneficial relationships with companies and individuals who uphold our values and ensure we are taking steps to improve education. For this reason we will not engage with any company or fundraising activity related to

practices that conflict with this, specifically tobacco, arms, alcohol, gambling and confectionery companies. These companies have the potential to damage the health, and risk the safety of the children and the communities that we work in. All other potential partnerships will be judged on a case by case basis in line with our ethical standards.

15. SeeBeyondBorders cannot take responsibility for any injury, loss or damage sustained as a result of 3rd party fundraising activities. This includes events and any other fundraising activity that form part of a partnership.
16. All fundraising activities conducted by both corporate partners and individuals should comply with UK and Australian Fundraising laws and regulations.

Procurement and Investment

17. The Ethical Standards Policy will also apply to investment of SeeBeyondBorders' money and to procurement of goods or services for our work.

Documentation and Review

18. A register of the names of organisations who have undergone an ethical check and/or have agreements allowing the use of our name and logo will be held on the internal shared drive and are linked with records on Salesforce.
19. The Ethical Standards Policy will be reviewed as and when required and at least every 3 years.

Approved by the Board

Date:

12/11/19

By (Board representative):



(Director)

Formal review required on or before:

_____ (Date)

Approved by the Trustees (UK)

Date:

By (UK Trustee representative):

Ethical Standards – Risk Assessment Form

Type of Risk	Risks to Consider	Assessment of Risk	Risk Rating (H M or L)
Reputational	What type of company is the potential partner? <i>Eg PLC, private, unincorporated, NGO</i>		
	Does the potential partner have a parent company? If so, who is it?		
	What industry does the potential partner operate in?		
	How long have they been established?		
	Where is the head office of the company? and what countries do they operate in?		
	How are they funded? <i>Eg re-invested profits, government support, donations</i>		
	Have they received negative press coverage in the past? <i>Include details where relevant</i>		
	Will a partnership damage SeeBeyondBorders' brand? How?		
	What is the public's perception of the company and its brand?		
	Any Other Comments?		

Alignment of Values	What are the company's motivations for charitable giving?		
	What are the company's values? Do they align with SeeBeyondBorders values?		
	Does the company actively promote its values in its operations?		
	Any Other Comments?		
Financial	Is the company financially sound? <i>Do they have the capacity to honour financial commitments?</i>		
	Does the company have a history of charitable giving at a similar level to their proposed partnership with SeeBeyondBorders?		
	Does the company appear on the List of Terrorist Organisations or the Consolidated List, as referenced in SeeBeyondBorders' Counter-Terrorism Policy?		
Delivery	Who will be the point of contact with		
	Any Other Comments?		

	SeeBeyondBorders? Where is that person based?	
	Do we feel that we can work in harmony with the point of contact/ the company?	
	Can SeeBeyondBorders meet the expectations of the company during the entire partnership?	
	Does the partnership agreement include a requirement for SeeBeyondBorders to endorse or promote product(s) or services? <i>If yes, this contravenes our Ethical Standards</i>	
	Any Other Comments?	

If the potential partner is assessed as 'high' or 'medium' risk in any area, the Ethical Standards Committee should be consulted before any further work is completed. All checks should be recorded on the Register of Companies that is saved in the Shared Drive (Policies/Ethical Standards).

Risk Rating should be allocated according to the following table:

Impact	Probability/ Likelihood				
	Rare	Unlikely	Possible	Likely	Almost Certain
Minor	Low	Low	Low	Medium	Medium
Moderate	Low	Low	Medium	Medium	High
Major	Medium	Medium	Medium	High	High