



WORKING WITH PARTNERS

POLICY

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1 DOCUMENT PURPOSE AND CONTEXT

This document provides a framework for the development and implementation of collaborative partnerships with other organisations interested in pursuing broadly similar development goals.

SeeBeyondBorders Australia recognises the need for local programs to be managed by local Partners. SeeBeyondBorders Australia looks to develop collaborative relationships with local and international Partners in identified locations, according to the circumstances and needs of the communities we wish to serve, and the alignment we seek.

SeeBeyondBorders Australia is a non-religious and non-political organisation. As per our Development Policy, donor funds 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 a particular party, and donations will not be accepted where such a purpose is expressed or implied. Furthermore, SeeBeyondBorders Australia does not engage in Non-Development Activity or Relief as defined by DFAT and ANCP guidance.

2 DEFINITION OF PARTNERS

For the purposes of this Policy, “Partners” are to be other Non-Government Organisations, registered in Cambodia as either International (so registered with the Ministry of Foreign Affairs), or local (so registered with the Ministry of the Interior) with whom we develop a relationship in order to jointly undertake development activities relating to the implementation of a program or project, or which we commission to undertake a program or project on our behalf.

The types of organisations we might work with that fall outside this definition of Partner include:

1. Service providers to SeeBeyondBorders Australia, some of whom may supply services that potentially include undertaking specialised activities as part of a development program or project. Examples could include specialist service providers, independent program reviewers or internal auditors. In such cases a service agreement which complies with the Procurement policy will be in place.
2. Donors who provide funding or contract us to undertake a particular development activity. In some cases, such as the arrangements with ANCP, these contracts may be deemed to be ones where SeeBeyondBorders Australia is the supplier of a deliverable service.

The types of relationships identified above under 1 and 2, are not identified as “Partners” for the purposes of this policy because these relationships relate to specific transactions and are governed by specific Policies including Fundraising, Communications and those that require that SeeBeyondBorders Australia does not engage in any Financial Wrongdoing in its interactions with these (or any) parties.

3. Any beneficiaries of our programs including those connected to education systems such as teachers, schools or education authorities, or members of the community who may be members of School Support Committees. These relationships are governed by a range of Policies that address the efficacy of our activities and our responsibilities to those we work with.

4. The Cambodian Government or international organisations such as bodies of the UN. These are excluded because we do not have the power to insist on them adopting standards of behaviour that we or indeed DFAT or ACFID deem appropriate. That is not to say that we do not seek to influence them where we can and encourage the application of good practice standards.

In all the above cases, we are not obliged to carry out full due diligence as is required for Partners as defined in this Policy. However, we do have an obligation to ensure that for other organisations with whom we have any form of service supplier arrangement, there are appropriate policies and practices in place in the context of the work being done.

Where staff of such organisations come into contact with SeeBeyondBorders Australia personnel or stakeholders, the organisation must demonstrate that its policies and procedures cover relevant areas of interaction such as but not limited to, a Code of Conduct and the safeguarding and protection of children and vulnerable people, and financial wrongdoing.

3 SEEBEYOND BORDERS STRUCTURE

SeeBeyondBorders Australia (SBBA) was established in 2009, the first SeeBeyondBorders entity to come into operation. Since 2017 SBBA has achieved accreditation with the Australian NGO Cooperation Program (ANCP) and is an active member of the Australian Council for International Development (ACFID) and has registration with the Australian Charities and Not-for-Profits Commission.

SeeBeyondBorders (a branch of SeeBeyondBorders Australia) has been working in Cambodia since 2009 to transform the quality of early grade education available to children in their classrooms. During 2024 it transitioned to become a fully operational locally led development organisation called StudyBeyondBorders from January 1 2025.

StudyBeyondBorders in Cambodia (SBBC) became registered with the Cambodian Ministry of Interior in February 2024. As of 1 January 2025, StudyBeyondBorders is fully operational and SeeBeyondBorders staff in Cambodia will have transitioned to this organisation. From that date StudyBeyondBorders assumes responsibility for program implementation and continues the work to provide children in Cambodia with the best possible start to their education by enabling quality teaching and learning at school.

The SBBA Chief Executive Officer, International Operations (CEO IO) is based in, and responsible for SBBA branch activities in Cambodia. The CEO IO also has overall responsibility for providing SBBA oversight of the implementing partner's Program and Project outputs and outcomes, in addition to obligations regarding safeguarding, financial, and crosscutting compliance matters.

The SBBA Chief Financial Officer is based in Cambodia and supports the CEO IO with SBBA oversight of policy and financial compliance of the implementing partner.

Both of these roles also play a strong role in capacity building, mentoring, and collaborative efforts between SBBA and our implementing partner.

4 DEVELOPMENT PHILOSOPHY / VALUES & STRATEGY

The shared development philosophy, values and strategy between SBBA and our implementing partner are defined by a Memorandum of Agreement (MoA), in conjunction with the SeeBeyondBorders Australia Development Policy.

5 WORKING WITH PARTNERS

5.1 Areas for collaboration

SBBA collaborates with a sole Partner, StudyBeyondBorders as implementing partner in the field of Cambodian education. Areas and methods of collaboration between SBBA and StudyBeyondBorders are detailed in an MoA between these two organisations.

5.2 ACFID Code of Conduct Compliance

SBBA is a signatory to the Australian Council for International Development (ACFID) Code of Conduct (the Code). This places obligations on SBBA, which include a requirement that we actively promote the values of the Code with our Partners as encompassed in our own philosophy and values. In particular, when engaging with our Partner agency, SBBA ensures that the policies and guidelines of our Partner agency are in alignment with the ACFID Code of Conduct.

Section 8.2.1 and 8.2.5 of the ACFID Quality Assurance Framework requires that the ACFID financial wrongdoing requirements (as detailed in our Financial Wrongdoing Policy) be extended to Partners with whom we work and forms part of the MoA undertakings.

5.3 Compliance with Policies

There are a number of SBBA policies which our Partner is required to comply with or to demonstrate similar standards in their own Policies, throughout the duration of the partnership agreement. These include:

5.3.1 Counter Terrorism:

SeeBeyondBorders will check that any potential Partners do not appear on the consolidated list or the list of terrorist organisations as found at www.nationalsecurity.gov.au. Partners will be expected to demonstrate that they have counter-terrorism measures in place.

5.3.2 Child and Vulnerable Persons Protection:

Partners must have a Child Protection / Vulnerable Persons Protection policy in place and be able to demonstrate a full understanding of this policy and their obligations to ensure that children, young people and vulnerable beneficiaries are not put at risk.

5.3.3 Safeguarding/ Prevention of Sexual Exploitation, Abuse and Harassment Policy (PSEAH):

Partners must have a Safeguarding policy in place and be able to provide evidence of this policy in practice in project design, implementation and evaluation activities, to ensure that all activities are designed with the intention to Do No Harm. This policy must include the partner's approach to PSEAH (or they will have a separate policy about PSEAH).

5.3.4 Communications Policy:

Partners must agree to adhere to (or have a similar Policy to) SeeBeyondBorders' Communication Policy, particularly aligning with DFAT's Visual Identity Guidelines and ensuring that photographs/videos of beneficiaries are taken with consent and in accordance with SBBA requirements.

5.3.5 Financial Wrongdoing Policy

Partners must agree to adhere to (or have a similar Policy to) SeeBeyondBorders Financial Wrongdoing Policy which addresses measures to be taken to minimise any risk of fraud, corruption, money laundering, and violation of Australian Government sanctions.

Measures must include ensuring that all parties with whom the Partner deals with, and makes payments to, including where salary payments or fee for service are made (so where individuals are hired as staff members or consultants), are checked against the DFAT consolidated list of individuals and entities subject to targeted financial sanctions, prior to commitments being made, with appropriate reports being generated and passed to SeeBeyondBorders to notify DFAT where a match is identified. This list can be found at <https://dfat.gov.au/international-relations/security/sanctions/Pages/consolidated-list.aspx>

5.3.6 Development Policy

SBBA only partners with organisations working in Development initiatives undertaken to reduce poverty and address global justice issues (ACFID Good Practice Toolkit Definitions).

SeeBeyondBorders specifically partners in the education sector in Cambodia. SeeBeyondBorders recognises that at times of crisis a partner may seek support for limited incidental humanitarian initiatives, and this may be considered. However it will not be the primary purpose of any project partnership.

Partners will be required to confirm that they conduct analysis of the context in which they implement each of their programs to identify any risks that primary stakeholders may face with regards to discrimination, violence, abuse, exploitation or neglect and develop strategies to prevent or mitigate this. Through the delivery of their programs, Partners working with SeeBeyondBorders are required to do all that they reasonably can to avoid exposing people to harm.

Where the partner organisation does not have Policy in place they shall be required to follow SeeBeyondBorders Australia Policy until such time as they create and approve their own.

5.4 Documentation of Partner Arrangements

SBBA will establish a partnership agreement (MoA) with any Partner. Such an agreement will integrate all policy and operational requirements and obligations, together with those imposed by funders, such as DFAT Australia or ANCP. Only once due diligence is complete as per clause 5.8. will any collaborative actions or transfer of funds take place.

SBBA is committed to ensuring that its Partners act with equivalent values, processes and controls and that all transactions are fair, transparent, without fraud and for the benefit of children's education and the communities that we aim to help.

SBBA recognises that in the case of government or quasi-government organisations, it may have minimal capacity to influence their policy making decisions. As permitted by the regulatory arrangements to which it is subject, SBBA will not make engagements with such organisations conditional on issues covered in this section.

5.5 Cost sharing arrangements

Where relevant, cost sharing arrangements will be determined by an agreed MoA with the Implementing Partner.

5.6 Due Diligence Process

The due diligence process for any potential partner has two strands. The first strand must be completed satisfactorily before any funding as governed via an MoA is provided.

The second strand involves the ongoing monitoring and evaluation of the partner program and project delivery.

Changes in implementing partnerships must also be notified in advance to DFAT and ANCP for their consideration, advice, and agreement.

The two strands are:

1. *Capacity and Capability Assessment - Operations*: to assure SBBA that the partner has the capacity and capability in the required organisational sections of governance and risk, development program management, partnering, communications integrity, and financial management;
2. *Quality Control – Programs and Projects*: to assure the ongoing monitoring and evaluation, reporting and delivery of excellence of programs and projects.

1. *Capacity and Capability Assessment - Operations*

- A. GOVERNANCE & RISK MANAGEMENT - The partner has a governing body, a documented structure of responsibilities and appropriate systems to ensure accountability.
- B. DEVELOPMENT APPROACHES AND MANAGEMENT - The partner has a track record of supporting and managing effective international development activities.
- C. APPROACHES TO PARTNERSHIP & COLLABORATION - where (and if) the partner has documented arrangements with other partner organisations in the country where it works..
- D. COMMUNICATIONS - The partner provides accurate, timely and accessible information about the organisation, its objectives and its activities, in a manner that respects the dignity of recipient communities. The Partner acknowledges Australian community and Australian government support.
- E. FINANCIAL MANAGEMENT - The partner has effective financial management policies, systems and the capacity and commitment to undertake activities in a professionally competent manner with regard to financial operations.

To assess these 5 sections SBBA will conduct due diligence through the Partner Capacity Assessment and Due Diligence Form (see Annex A). This assessment will be repeated in three year cycles starting in the last quarter of 2024.

SeeBeyondBorders Australia has their CFO located in-country in Cambodia for ongoing monitoring of policy compliance and financial management of funded projects.

2. *Quality Control – Programs and Projects*

1. **Program and Project Design:** To assess that rigorous evidence-based program design methodologies are in place. Research, planning, design and implementation must be structured and documented.
2. **Impact Measurement and Reporting:** To assess systems for monitoring and evaluating the effectiveness of its programs. Reporting to SeeBeyondBorders Australia on the impact of these programs is critical for ensuring that a partner can demonstrate their contributions to educational improvements and sustainable development.

The Partner is required to have a project life cycle as per the SBBA DME Policy, and which spans the entire duration of each project that SBBA supports in designated districts and schools in Cambodia, starting with the research phase, progressing through to the planning and design and implementation phases, followed by monitoring, and reviewing as part of the continuous improvement cycle, and concluding with an evaluation phase.

Based on the evidence provided at each phase, decisions are made on whether to continue, amend, or discontinue implementation.

The ongoing oversight and management of the implementation of projects and programs in Cambodia supported by SBBA is achieved through:

- SBBA review and endorsement of the local partner Design Monitoring and Evaluation (DME) Policy and agreement on any changes based on learnings.
- Assessment by SeeBeyondBorders Australia using the Partner Capacity Assessment and Due Diligence Form (Annex A) in a minimum of three year cycles
- Partner provision of regular reporting on individual programs demonstrating the application of the DME policy in practice.
- Consideration by SBBA Board of partner progress and reports
- SBBA Board agreement on a planned schedule of funding for programs/projects based on requirements for implementation and anticipated SeeBeyondBorder Australia income.
- Provision for agreement by a partner to implement any special conditions required by individual public or private donors to SBBA.

These funded Partner activities are subject to oversight by the SBBA Board in addition to that of the CEO International Operations and CFO who are located in-country in Cambodia. The CEO International Operations will also provide advice to the local partner board and transmit partner feedback to the SBBA Board.

6 CONCLUDING REMARKS

This document sets out the policy and guidance for a collaborative formalised partnership which is to be documented in the Memorandum of Agreement in accordance with the requirements of DFAT and the ACFID Code of Conduct.

7 POLICY MANAGEMENT

This Policy has been approved by the Australian Board. Approval by the Trustees of other SeeBeyondBorders' entities is no longer required as of 2024 as those entities now have their own governance systems.

Amendments and or developments will be recommended to the Board from time to time as deemed appropriate by senior management. Formal reviews will take place before the expiry of three years from the anniversary date of approval by the Board. Recommendations for minor changes can be approved by the CEO IO or Chief Executive Australia before the expiry of three years.

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	Policy Creation	Board November 2016	
WWP/11/2019/1.0	Policy Review	Board 12 Nov 2019	Item 5
WWP/09/2020/1.0	Policy Update	Board 16 Sep 2020	Item 8
WWP/09/2020/1.1	Policy Update	CEO Note Feb 2021	
WWP/12/2024/2.1	Policy Update	Board December 2024	