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StudyBeyondBorders Organisation

Policy

Code of Conduct

Change begins with Education

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CODE OF CONDUCT

1 STUDYBEYONDBORDERS IN CAMBODIA OVERVIEW

StudyBeyondBorders in Cambodia (SBBC) is a local Cambodian non-government organisation operating in rural areas of Battambang and Siem Reap Provinces. The organisation is supported by an alliance of registered development organisations in Australia (SBBA), the UK (SBBUK), and Ireland (SBBI).

SBBC aims to build capability within Cambodian education policy-making, leadership, mentoring, and training to equip and motivate teachers to provide quality education to children. The organisation is committed to supporting systemic change so that educators are proud to work in the teaching profession and are highly respected by parents, communities, and peers. To this end, **SBBC** conducts programs to mentor education leaders, upskill teachers, engage parents and communities, and develop resources that together enable the delivery of quality education to schoolchildren. The organisation seeks to embed all its work at the school, district, provincial, and national levels.

2 DOCUMENT PURPOSE

This document sets out the code of conduct expectations, both professional and personal, of **SBBC** personnel.

This policy applies to all **SBBC** personnel, defined as:

- Board of trustees
- current staff and volunteers
- external consultants and contractors (paid or voluntary)
- contracted staff or personnel of contracted organisation and services
- project team participants, and any other person working for or on behalf of **SBBC**.

It also applies to individuals and third parties associated with **SBBC**, such as donors, partners, and service providers, though management processes may vary based on their involvement.

3 GENERAL POLICY OBJECTIVES

This Code of Conduct ("Policy") is designed to ensure that all **SBBC** personnel are aware of their obligations and responsibilities as part of, or in representation of, the organisation.

4 INTRODUCTION

It is not possible or practical to prescribe behaviour in every circumstance; rather **SBBC** personnel should be guided in their conduct by the general principles recorded in this policy, which reflects both legal requirements and our core values. Personal and professional behaviour must contribute to a productive and harmonious environment and reflect favourably on the individual, colleagues and groups, our profession and **SBBC**.

All **SBBC** personnel, whether starting employment or on a short-term assignment, including project team participants or visitors, must read and acknowledge the content of the code by signing the declaration.

Compliance with the code helps to:

- Maintain public trust and confidence in the integrity and professionalism of **SBBC**;
- Continue to maintain public confidence in the integrity and efficacy of **SBBC**'s programs;
- Ensure that the program is effectively implemented in line with the aims and objectives of **SBBC**.

Non-compliance may result in withdrawal of personnel from **SBBC** programs and/or contract termination.

SBBC prohibits association with individuals convicted of offences related to child abuse, sexual misconduct, exploitation, trafficking, or harassment. Contracts or associations will be terminated immediately upon evidence of such offences.

5 PERSONAL AND PROFESSIONAL BEHAVIOUR

5.1 OUR RESPONSIBILITIES

As **SBBC** personnel, our responsibilities are to:

a) Comply with all relevant laws, regulations, and **SBBC** policies.
b) Follow lawful and reasonable instructions from authority figures.
c) Maintain and enhance professional knowledge and judgment in the interests of **SBBC** and beneficiaries.
d) Treat everyone with dignity, respect, and cultural sensitivity, without harassment.
e) Act ethically, professionally, and with integrity.
f) Avoid and disclose conflicts of interest as per the Conflict of Interest Policy.
g) Make fair, unbiased decisions based on factual information, supported by adequate documentation.
h) Use **SBBC** communication systems responsibly and safeguard internal information.
i) Report unethical behaviour, wrongdoing, or policy breaches, including inappropriate gifts or hospitality.
j) Adhere to the Anti-Discrimination, Bullying, and Harassment Policy and uphold **SBBC**'s zero-tolerance policy for sexual exploitation, abuse, and harassment (SEAH).
k) Ensure the safeguarding of children and vulnerable individuals in all actions.

5.2 FRAUD AND CORRUPTION

SBBC has a zero-tolerance policy towards any fraudulent or corrupt behaviour, including financial wrongdoing. Such behaviour by any **SBBC** personnel will result in immediate withdrawal from the program and/or termination of contract.

Fraud - '*Dishonesty obtaining a benefit, or causing a loss, by deception or other means'* – Commonwealth Fraud Control Framework 2017[1].

Corruption - *'the abuse of entrusted power for private gain' – DFAT Fraud Control and Anti-corruption Plan 2015[2].*

Bribery - is a form of corruption that involves offering, giving, receiving, or soliciting something of value to influence the actions of an individual in a position of power.

5.3 UNETHICAL/ILLEGAL BEHAVIOUR

Any illegal or unethical behaviour will not be tolerated and will result in immediate withdrawal of the personnel involved from **SBBC** programs and/or termination of contract.

Such conduct includes, but is not limited to, purchasing/supplying stolen property, or property that is reasonably suspected of being stolen; or engaging in any form of sexual harassment towards others; or dishonestly obtaining a benefit by deception or any other means that would advantage oneself or any other person(s).

Illegal activities will be reported to the Police.

[1] https://www.ag.gov.au/integrity/publications/commonwealth-fraud-control-framework
[2] https://www.dfat.gov.au/about-us/corporate/fraud-control

5.4 USE OF ALCOHOL

All personnel should not perform any duties or participate in any program or project activity whilst under the influence of alcohol.

5.5 DRUG POSSESSION OR USE

Unauthorised possession or use of any illegal drugs is prohibited and will result in immediate withdrawal of the personnel involved from **SBBC** programs and/or termination of contract.

This applies both on and off duty and any incident may be reported to the Police.

5.6 SMOKING

SBBC does not promote smoking and as such it does not permit smoking within any of its premises or within the grounds of any of its premises.

Personnel should not smoke in the presence of children or within school grounds when on duty or representing **SBBC**.

5.7 PROHIBITION ON TRANSACTIONAL SEX

SBBC prohibits transactional sex for all personnel while they are conducting **SBBC**'s business or are in a position to represent **SBBC**, whether during working hours or outside of them.

5.8 PROHIBITION ON FRATERNISATION

Fraternisation refers to relationships formed during work that involve—or appear to involve—partiality, preferential treatment, or misuse of authority. This includes voluntary sexual behaviour, intimate relationships (physical or emotional), public displays of affection, or private acts of intimacy.

Significant power imbalances, such as those related to gender, age, authority, or socio-economic status, increase the risk of exploitative or transactional relationships.

SBBC strictly prohibits fraternisation by personnel while performing or representing **SBBC**'s work, both during and outside working hours

5.9 CHILD PROTECTION & SAFEGUARDING

All **SBBC** personnel must:

a) Actively promote the Rights of the Child as set out in the UN charter.
b) Adhere to statutory laws in any country that we work and where they may be representing **SBBC**.
c) Adhere to the **SBBC** Child and Vulnerable People Protection, and Safeguarding Policies.
d) Acknowledge and accept the guiding principle that protection of the child is in all cases the overriding consideration.

SBBC personnel are required to immediately disclose any charges, convictions, or outcomes of offences related to child exploitation or abuse, including those under traditional law, that occurred prior to or during their association with **SBBC**.

SBBC reserves the right to dismiss or withdraw personnel if it determines that the individual poses an unacceptable risk to the safety or well-being of children or vulnerable individuals. If deemed appropriate, **SBBC** may suspend personnel or reassign them to alternative duties as a temporary measure while an investigation is conducted.

SBBC recognises the need to implement specific principles to manage risks related to the protection of children and vulnerable persons from its volunteers, donors, and visitors to its programs. These principles are as follows:

i. ***SBBC's personnel and partners <u>will</u>:***

- Treat every individual with dignity and respect regardless of differences in ethnicity, religion, age, ability, gender, sexual orientation, race, colour, language, political or other opinion, national or social origin, property, disability, birth status, and economic circumstances.
- Conduct themselves in a manner consistent with their position as a positive role model to children and communities, and as a representative of **SBBC**.
- Immediately raise and report any concerns for the safety or wellbeing of a child with the **SBBC** Safeguarding Focal Point, General Manager Shared Services or Managing Director, in accordance with the reporting procedures.
- Be visible when working with children and other vulnerable beneficiaries.
- Avoid being alone with children or vulnerable beneficiaries and wherever possible, ensure that other adults are present when working in the proximity of children.
- Comply with all relevant local legislation, including labour laws in relation to child labour.

ii. SBBC's personnel and partners <u>will not</u>:

- Engage in any behaviour that is intended to shame, humiliate, belittle, or degrade people or groups of people.
- Use language, make suggestions, offer advice, or engage in any behaviour that is inappropriate, discriminatory, offensive, harassing, sexually provocative, demeaning, culturally inappropriate or abusive.
- Supply alcohol and drugs to a child or other vulnerable beneficiary as this is inappropriate behaviour.
- Do things of a personal nature that a child or other vulnerable person can do for him/herself, such as assistance with toileting or changing clothes.
- Take children/vulnerable people to their own accommodation unless they are at immediate risk of injury or in physical danger.
- Sleep in the same room or bed as a child/vulnerable person unless absolutely necessary, in which case, the project team leader's permission must be obtained, and another adult must be present wherever possible.
- Physically punish or discipline any child or vulnerable person.
- Engage any child, children, or vulnerable person in any form of sexual activity or acts, including paying for sexual activity or acts.
- Act in ways that may be abusive or place a child/vulnerable person at risk of abuse or harm.
- Behave physically in a manner that is inappropriate or sexually provocative towards a child/vulnerable person.
- Condone, or participate in, behaviour towards children/vulnerable people that is illegal, unsafe or abusive.
- Act in a way that shows unfair differential treatment, or favour towards particular children/vulnerable people to the exclusion of others, including offering gifts.
- Record or publish any child's or vulnerable person's name or any address details with photographs.
- Hold, kiss, cuddle or touch a child/vulnerable person in an inappropriate, unnecessary or culturally insensitive way. Touching should: only be in response to the needs of the individual; be only with the individual's permission (except in an emergency situation); avoid the breasts, buttocks and groin; and be open and non-secretive.
- Use any computers, mobile phones, or video and digital cameras inappropriately, or access child pornography through any medium.
- Hire children/vulnerable people for domestic or other labour, which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.

When photographing or filming any individual (children or vulnerable people in particular) for work-related purposes, SBBC' personnel will ensure that:

- Local traditions or restrictions for reproducing personal images are adhered to before photographing or filming.
- Informed consent is obtained in writing before photographing or filming including an explanation of how the photograph or film will be used. This process will be conducted in Khmer.
- All publications present all subjects, especially children, in a dignified and respectful manner and not in a vulnerable or submissive manner, and that any children are fully clothed with shoulders covered and not in poses that could be seen as sexually suggestive.
- Images honestly represent and convey the context and complexity of the situations in which they are taken.
- File labels, metadata and text descriptions do not reveal identifying information about a child or vulnerable person when sending images electronically or publishing images in any form. This includes full names, names of schools, specific geographical location details and any other information that may enable a third party to identify and locate a specific person as a result of a **SBBC** publication.
- No images are published without the prior approval of the Engagement Manager or Managing Director.
- Adhere to the **SBBC** *Images policy* at all times.

Responsibilities where inappropriate behaviour is witnessed:

- Where **SBBC** personnel witness another person committing an act that breaches this policy, it is the responsibility of that person to report what they have witnessed in the first instance to the Safeguarding Focal Point, General Manager Shared Services or Managing Director; or any other member of the senior leadership team whether or not the perpetrator is connected with **SBBC**. The details of what and how to report are available in Appendix C of the Child and Vulnerable People Protection Policy. They may then be required to assist with the ensuing investigation.

All personnel are required to sign a declaration that they fully understand and will adhere to this Code of Conduct; the Child and Vulnerable People Protection Policy; the Code of Conduct for Working with Children and Vulnerable People and the Safeguarding Policy.

5.10 DONATIONS, GRANTS AND MONEY RECEIVED IN AID

All **SBBC** personnel will ensure that donations or grants in aid shall be used as pledged or implied in fundraising appeals, or as requested by the donor, or as specified in the submission and/or agreement related to the donation or grant.

5.11 CONFLICTS OF INTEREST

SBBC adheres to the principle of respect for the individual which entails strict regard for the privacy and dignity of its personnel. **SBBC** will therefore not routinely involve itself in the private lives of its personnel.

However, while **SBBC** recognises that it can be difficult to avoid situations where there is a potential conflict of interest, all personnel are required to immediately disclose to their supervisor or manager any financial, personal or other interest or potential interest which could directly or indirectly compromise the performance of their duties, or conflict with **SBBC** interests, and take action to avoid the conflict.

See separate "*Conflict of Interest Policy*" for more detail.

5.12 PUBLIC COMMENT

SBBC personnel must ensure that public comments (either verbal or written) made in a private capacity are not attributed as an official comment of **SBBC**. In this regard, official stationery and email signatures should not be used for private correspondence or for purposes not related to official duties. **SBBC** personnel, with the exception of the Board Chairperson or Managing Director or persons specifically designated by the Board or the Managing Director, may not make any public comment on behalf of **SBBC** without specific written prior approval.

5.13 USE OF SBBC RESOURCES

Our aim is to ensure that resources (such as materials, funds, personnel, equipment, facilities, electronic communications, letterhead, etc) are entrusted to **SBBC** personnel, and are used efficiently, carefully, lawfully and honestly. Unless permission has been granted, **SBBC** resources are not to be used for private purposes.

5.14 ACCEPTANCE OF GIFTS AND BENEFITS

SBBC personnel must not solicit gifts, benefits, or additional money for themselves or others. Gifts or benefits must not be accepted if they could compromise or influence personnel in their official role. Influencing colleagues through gifts or inducements is prohibited.

As a guideline, gifts of nominal value (e.g. promotional items) or moderate hospitality may be accepted. Gifts of significant value or benefits must be reported to a member of the senior leadership team. If in doubt, personnel should seek guidance from senior staff.

Program participants and visiting donors are discouraged from giving tips or gifts to staff. Any received gifts must be reported to a member of the senior leadership team and managed by the Finance team for equitable distribution, such as funding an annual staff retreat.

Allowances exceeding **SBBC**'s standard amounts, such as those from third-party-sponsored events, must also be reported and pooled for shared staff benefit.

All received gifts must be recorded in a gift register, with the recipient responsible for ensuring proper documentation.

5.15 PREVENTION OF SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (PSEAH)

SBBC is committed to providing a safe and productive work and learning environment in which the diversity of individuals is recognised and respected. Sexual exploitation, abuse and harassment (SEAH) will not be tolerated under any circumstances. **SBBC** personnel who believe they are the subject of SEAH, or believe they have witnessed SEAH, should take firm, positive and prompt action to report the incident, following the steps outlined in Appendix C of the Child and Vulnerable People Protection Policy.

See separate *Anti-Discrimination, Bullying and Harassment Policy* for more details.

5.16 RESPONSIBILITIES AFTER LEAVING SBBC

SBBC personnel must not disclose confidential, sensitive, or protected information about **SBBC,** its programs, or projects after leaving the organisation.

Former staff and volunteers must not exploit personal, confidential, or official information obtained during their time with **SBBC**. Current personnel must avoid giving former staff preferential treatment or access to such information. Official references for former employees may only be provided with authorisation from the Managing Director.

SBBC personnel must not use their position to advance future employment prospects or allow external job offers or plans to compromise **SBBC**'s best interests.

5.17 BRIBERY

While bribery is briefly defined in section 5.2 above, it is also implicit in a number of other sections of the Code including those relating to the use of **SBBC** resources or donated funds, the making or receiving of gifts, and any activities outlawed as illegal.

The point is reiterated here that the making or receiving of amounts that might in any circumstances be construed as a bribe will result in immediate withdrawal of personnel from SBBC programs and/or termination of contract.

5.18 WORKING WITH PARTNERS

In alignment with **SBBC**'s *Working With Partners* Policy, the following Code of Conduct principles apply to all partnerships, including those involving joint activities conducted for or on behalf of **SBBC**. The principles of inclusion and safeguarding of children and vulnerable people are paramount:

- **SBBC** will ensure that any formal partner, whether an individual, contractor, or organisation, has policies and procedures providing at least equivalent protection for children and vulnerable people as outlined in this document.
- If a partner lacks the required safeguards, **SBBC** may choose not to engage with them or assist in building their capacity to implement necessary protections, before commencing collaboration.

6 ADDITIONAL RESPONSIBILITIES FOR THOSE ON OVERSEAS ASSIGNMENTS/VISITS

6.1 HOST COUNTRIES. When visiting host countries **SBBC** personnel will:

a) Comply with all local laws and regulations.
b) Avoid party politics, public commentary, and demonstrations on political, cultural, or religious matters.
c) Avoid any involvement, direct or indirect, with terrorism-related activities.
d) Respect national symbols and religious practices.
e) Refrain from promoting or attempting to convert others to a specific religion or belief system.

6.2 SECURITY AND EMERGENCIES. When visiting overseas countries **SBBC** personnel will:

a) Register with their home Embassy or High Commission, if possible.
b) Monitor government travel advisories.
c) Exercise caution to avoid harm or injury.
d) Follow all **SBBC** security arrangements, critical incident procedures, and workplace health and safety protocols.

6.3 HEALTH MANAGEMENT AND INSURANCE. When visiting overseas countries **SBBC** personnel will:

a) Take responsibility for their health management.
b) Ensure they have valid health and travel insurance when abroad.

6.4 REPUTATION AND REPRESENTATION. When visiting overseas countries **SBBC** personnel will:

a) Avoid actions that could damage the reputation of **SBBC**, its donors, or supporters.
b) Not make public statements related to **SBBC** activities without prior approval.

7 RESPONSIBILITIES OF MANAGEMENT, TRUSTEES AND SENIOR PERSONNEL

Management, trustees and senior personnel are responsible for, but not limited to:

a) Providing **SBBC** personnel with access to the Code of Conduct and relevant documents/policies.
b) Ensuring staff and volunteers uphold high standards of conduct.
c) Supporting personnel who disclose information regarding corrupt/improper conduct.
d) Taking necessary actions to resolve workplace conflicts and prevent recurrence.
e) Properly documenting reports of conflicts of interest and any actions for handling them.

8 BREACHES OF THIS POLICY & SAFE REPORTING OF WRONGDOING (WHISTLE BLOWING)

When an individual becomes aware of a breach of this policy or any other wrongdoing, they should report it to a member of the senior leadership team immediately. Should a breach of the Code be severe enough to be referred to the Board, this should be to the Chairperson. All reports of wrongdoing will be treated with respect, and SBBC will take necessary steps to protect whistleblowers from retaliation. Those subject to the disclosure will be treated fairly and impartially.

The **SBBC** Board of Trustees holds final responsibility for breaches of the Code of Conduct (including fraud, corruption, and conflicts of interest), however reports of breaches will be forwarded to a member of the senior leadership team (or directly to the Managing Director), who will assign a lead investigator. In serious cases, the Managing Director may refer the matter directly to the Board. Complaints involving the Managing Director will be directed to another member of the senior leadership team and the Chairperson of the Board.

All incidents will be fully investigated and may be referred to a member of the senior leadership team, the Board, or external authorities as necessary. **SBBC** personnel may escalate issues directly to the Board at any time.

If wrongdoing is identified, it will be promptly addressed at the highest appropriate level, such as the Managing Director, Board, or external authorities, including the police if needed, to demonstrate the seriousness of inappropriate behaviour.

9 POLICY MANAGEMENT

This policy has been approved by the Board of Trustees of **SBBC** as noted below.

Amendments will be recommended to the Managing Director from time to time as deemed appropriate by the General Manager Shared Services, usually annually.

Formal reviews are recommended every three years from the anniversary date of approval by the Board.

Recommendations for minor changes can be approved by the Managing Director before the Board review every three years.

Reference Code	CoC/12/2024/V1.0
Executive Owner	The General Manager-Shared Services
Policy Manager	The Human Resource Manager
Effectiveness Approval Body	SBB Cambodia Board
Date Approved	Reviewed: Feb/2025; Approved/07/May/2026
Effective Date	01/Dec/2024
Next Formal Review	01/Dec/2027
Version Number	V1.0

**Note: This policy was published and approved by the Managing Director and General-Shared Services in December 2024 before Board establishment.*

CODE OF CONDUCT DECLARATION

Declaration of Understanding and Compliance

I, _____ (write name), declare that I have read and understood the contents of the **StudyBeyondBorders** in Cambodia Code of Conduct and confirm that I understand my responsibility to comply.

Signed _____ Date _____

Role/Association _____

Images Declaration

I, _____(write name), **do give my consent / do not give my consent** to appear in photos and/or videos that are produced and published by **SBBC**. I understand that these photos and/or videos may be used in written reports, publicity materials, websites and social media sites, funding applications and more, and even if removed by **SBBC**, may continue, due to the nature of the World Wide Web, to exist in perpetuity. I understand that I can withdraw my consent at any time.

Signed _____ Date _____

Role/Association _____

e) APPENDIX A – REPORTING PROCEDURES

Child Protection Concerns

StudyBeyondBorders in Cambodia (SBBC) personnel should immediately raise and report any concerns for the safety or wellbeing of a child to one of the following people:

- **SBBC** Safeguarding Focal Point Officer
- **SBBC** Managing Director

The incident will then be investigated and escalated in accordance with the **SBBC** *Child and Vulnerable People Protection Policy.*

Sexual Exploitation, Abuse or Harassment Concerns

SBBC personnel who believe they are the subject of sexual exploitation, abuse or harassment, or believe they have witnessed or suspect an incident, should take firm, positive and prompt action by reporting the incident immediately to one of the following people:

- **SBBC** Safeguarding Focal Point Officer
- **SBBC** Managing Director

The incident will then be investigated and escalated in accordance with Appendix C of the Child and Vulnerable People Protection Policy. This may include reporting the incident to relevant authorities such as the Police.

Bullying, Harassment, Discrimination or any Safety and Security Concerns

SBBC personnel who believe they are the subject of discrimination, harassment or bullying should take firm, positive and prompt action. **SBBC** personnel should speak to their line manager, or any of the following people:

- Human Resources Manager
- Managing Director

SBBC will investigate any concerns raised and take reasonable action in accordance with the **SBBC** *Anti-Discrimination, Bullying and Harassment Policy,* including applying any sanctions that are appropriate to the case.

Financial Wrongdoing

SBBC maintains a 'zero tolerance' attitude towards financial wrongdoing. Financial wrongdoing will constitute misconduct and may be grounds for removal from the program and/or termination of contract. All personnel must report any case of suspected or detected financial wrongdoing immediately it is detected or suspected, to one of the following people:

- Finance Manager
- Managing Director
- Board Chairperson

SBBC will prosecute or apply other appropriate sanctions against those who have committed fraud and/or engaged in corrupt conduct, and will report financial wrongdoing to upstream partners in line with partner agreements within five business days.

Complaints

Complaints can be made verbally, by email or in writing and should be directed to our dedicated email address: feedback@seebeyondborders.org

If an individual is unhappy with **SBBC**'s handling or resolution of the complaint, they can complain directly to the relevant regulatory body.