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StudyBeyondBorders Organisation

POLICY

COMMUNICATIONS POLICY

Change begins with Education

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Communications Policy

1. PURPOSE

This document provides a general overview of the various forms of communication undertaken by StudyBeyondBorders in Cambodia (SBBC) and a set of subsequent guidelines for SBBC staff and volunteers. 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).

All staff and volunteers who are engaged by SBBC are expected to adhere to these communications guidelines.

The purpose of the communications policy is to:

- Ensure SBBC adheres to essential regulatory requirements and industry standards.
- Ensure SBBC staff and volunteers are fully informed about the Organisation's key policies that define appropriate and expected behaviour, especially the Child and Vulnerable People Protection Policy.
- Ensure all external communications reflect SBBC's Strategic Plan 2021-2026, Operational Plan and core values.
- Ensure there is an appropriate framework in which the right to privacy of children, families, teachers, principals and all other people with whom SBBC is working with are considered and respected.
- Ensure there is an appropriate framework in which the rights to privacy of donors, whether current, or past, or potential future donors with whom we communicate, are considered and respected.

This document should be read in conjunction with the organisation's Strategic Plan 2021-2026 which governs SBBC's development objectives and the manner in which they will be conducted. It should also be read in conjunction with our Policies & Compliance documents, including SBBC's Image Policy.

2. VALUES

SBBC's Development Philosophy provides the foundation principles upon which our approach to all aspects of our work are based. The values outlined in SBBA's Development Policy underpin all of the Organisation's internal and external-facing activities. This includes how we work together and importantly the manner in which we engage with all external stakeholders.

Essential to this policy are the values espoused in the Strategic Plan as these also predicate the manner in which communications will be undertaken. For reference, these values are restated below.

Changemaker: Our biggest priority is to create positive, large-scale and sustainable change in Cambodia. We are not just helping one or two communities - we are working towards large-scale systemic and sustainable change so that one day the assistance of SBBC in our current guise will no longer be needed.

Competency: All of our programs are supported by knowledge and experience. Our team is made up of well-trained professionals, who approach tasks with competency and skill. We are always working to share and build knowledge, learn from experience, and promote the idea of two-way knowledge exchange.

Integrity: We are always transparent and view mistakes as opportunities to learn. We always strive to be honest and to ensure that it is our shared vision alone that drives our work.

Courage: It's not easy to challenge the status quo. But to build a better future for Cambodian children, our staff, our partners and the communities we work with act with personal courage every day to stay the course in the face of adversity.

Respect: Our actions are always founded on respect - for the teachers, students, and community members we work with, for our fellow team members and for our donors and supporters. We recognise the power we have in our representation of the communities we work with, and we only represent people in ways that are honest, respectful and fully consensual.

3. DEFINITIONS

Communication **:** Communication encompasses all forms of contact between representatives of SBBC and others, including but limited to: donors, partners, supporters, staff, volunteers and all recipients of support under any SBBC programs and members of the general public.

Communication Tools: The sharing of information using the following Communications Tools constitute forms of contact:

1. Visual – Photos, Videos.
2. Verbal – Conversations, including when attending meetings and telephone conversations.
3. Digital Platforms – Email, PowerPoint presentations, the website, social media including Facebook, LinkedIn, Instagram, X (formerly Twitter), Youtube, Wordpress and Mailchimp.
4. Written – Formal correspondence, brochures, advertising, media releases, news articles, presentations and other forms of promotion and information dissemination.

Communicator : A person who is engaged in any form of contact on issues pertaining to SBBC or its stakeholders.

Internal Communication : All forms of communication that occur between representatives of SBBC (staff, volunteers, board and consultants) that take place as part of daily interactions with one another, and are not shared with any external stakeholders.

External Communication : Any form of communication undertaken by representatives of SBBC to external individuals, groups and the general public.

Personal Information : Information regarding the personal lives of representatives of SBBC, such as details regarding their family, friends, political and religious beliefs and views and opinions on matters outside the scope of SBBC operations. This might also include other information such as bank account details or contact details in the case of donors, or data that allows an individual to be identified.

Professional Information : Information that directly relates to the operations and activities undertaken by SBBC, or is formed on the basis of those operations and activities.

Regulatory Authorities : There are a number of Government and Independent Organisations which SBBC is required to report to either as a result of voluntary subscription or in order to maintain a certain form of accreditation.

4. POLICY

SBBC encourages free-flowing communications across all aspects of its activities and actively seeks additional members of the public who will talk, blog, publish on social media or communicate in any

way about the work of SBBC in any medium. However, SBBC is mindful of the need for communications to the appropriate, in context and intent, as well as being honest, accurate and timely. Therefore it is essential that no material is published on behalf of, or representing, SBBC without the prior authorisation of designated personnel.

SBBC communicates jointly in English and Khmer, with decisions made on a case by case basis on which language should be primarily used in the specific communications situations, based on the target audience of the given situation, therefore the designated personnel differ according to the language being used. The designated personnel for English communications approval are the SBBC's Organisational Adviser (also known as CEO International Operations) and the Program Support Adviser. The designated personnel for approval of communications in the Khmer language are the Engagement Manager, Engagement Officer and on occasion the Managing Director.
The following points of principle apply to all communications.

4.1 Principles governing all communications:

a. **Transparency and Accuracy**: Initiators of communications with stakeholders will take all reasonable steps to ensure that at all times their messages in any form of contact are accurate and transparent.

b. **Timely and Proactive**: Communications with stakeholders will be timely such that important and relevant information is communicated within a timeframe that takes into consideration the stake that the other party has in the matter. Similarly, where information becomes available to SBBC which is relevant to a stakeholder, SBBC will proactively look to make the necessary communication.

c. **Sensitive and Accessible**: The form of communication and the means of delivery will make reference to the medium used. Some information may be appropriate for regular newsletters but other information may need sensitive communication to a specific individual. Reference should be made to the designated personnel, to handle a particular matter or for guidance where a matter is not perfectly clear.

d. **Respectful**: In all interactions with others, SBBC staff and volunteers are required to treat the party with whom they are communicating with the utmost respect for their dignity, values, history, religion and culture. While employed by the organisation, SBBC staff and volunteers must act as representatives both inside and outside the workplace, and take care to uphold

the organisation's values, show respect and humility and take all necessary measures to avoid offending others in all communications.

e. **Privacy**: As per SBBA' published Privacy Policy, SBBC will at all times respect the privacy of every individual and will not publish, or in any way communicate, personal information about that person without his or her permission and without him or her providing that personal information freely. It is acknowledged that at times there may not be clarity of whether that permission has been granted in the full knowledge of how it will be used and in such cases, the test is whether or not that information could bring any personal harm, difficulty or notoriety from its publication to them or members of their family or their associates.

f. **Information that will or will not be communicated**: In addition to private information as referred to above, solicitous, malicious, defamatory or other unsubstantiated information will not be communicated. In all cases, communications will confine themselves to SBBC' activities representing its philosophy and values and will not deviate into areas that are not relevant to the organisation's objectives.

g. **Communication timetables**: In a general sense, communications will take place according to a predetermined timetable. This includes updates to donors about projects they have contributed towards, financial information in the form of Annual Reports, meetings of staff, the executive, Fundraising Committee or the Board, or newsletters. However, this policy does not override the need to provide information in a timely manner as stated above such that the regular reporting cycle may need to be augmented by matters of immediate importance. Such decisions are to be taken by the designated personnel, in a particular instance.

4.2 Outgoing Marketing Communications:

Consistency and veracity of message are sought with respect to all materials that are submitted to those who SBBC wishes to engage in its activities. As such, key items of marketing material, including the use of images, are to be approved by the designated personnel, as he she determines relevant for the particular circumstances. In all cases, marketing materials will account for:

a. **Portrayal of Local People**: SBBC will ensure that the use of images and messages portraying women and men, boys and girls in their communications respects the dignity, values, history, religion and culture of the people portrayed. See clause 4.2c for further information on the portrayal of images.

b. **Honesty and Transparency Application**: Images and messages will honestly portray the diversity of local people including age, disability and other marginalised groups. Images and messages will honestly convey the context and complexity of the situations in which local people live.

c. **Privacy Application**: Key figures in images will be informed of what the image is being used for and their permission obtained in accordance with the Images Policy, which is a separate policy because of its significance with regards to both Communications and Protection of Vulnerable Persons, linking also with SBB' Code of Conduct. As identified in the Images Policy, care will be taken to ensure that the identification of or use of images of local people will not endanger the people they portray.

d. **Inclusion and Portrayal**: In all instances, SBBC will ensure that the use of messages and images comply with the guidelines outlined in the Inclusion Policy, ensuring fair representation and transparency surrounding cross-cutting themes.

e. **Copyright**: Origins of any images used will be known and any necessary permissions, including copyright releases, be held.

f. **General Data Protection Regulations**: SBBC complies with the General Data Protection Regulations (2018) and communicates with supporters on the legal bases set out in our Privacy Policy, usually upon receipt of explicit permission being provided by the individual.

g. **Ethical Decision Making Framework**: In all instances, SBBC will ensure all images and messaging is in accordance with both the Image Policy and Ethical Decision Making Framework and the guidelines and relevant approval processes stated in each.

h. **Child and Vulnerable People Protection**: In all instances, SBBC will ensure that the use of messages and images comply with Clause 9 from the Child and Vulnerable People Protection Policy where it is stated:

To protect the children, young people and vulnerable people with whom it is involved; when photographing or filming a child/vulnerable person or using children's images for work-related purposes, SBBC will ensure:

- Local transitions or restrictions for reproducing personal images are adhered to before photographing or filming.

- Informed consent is obtained from the child/vulnerable persons (verbally) and parent/guardian of the child/vulnerable person (in writing) before photographing or filming including an explanation of how the photograph or film will be used and how it is to be used and for how long (this includes informing the permission giver that if the consent covers publication on the internet that even if the images is removed by SBBC there is a risk that the image may still be available). This process will be conducted in Khmer.
- All publications present children/vulnerable people in a dignified and respectful manner and not in a vulnerable or submissive manner, and that children are fully clothed and not in poses that could be seen as sexually suggestive.
- Images honestly represent and convey the context and complexity of the situations on 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. Appointed selected members of SBBC team with cross references access to the library of photographs and informed consent forms, and to ensure documents that there is consent for image before publication.
- All staff, volunteers and visitors read and understand the Images Policy, and sign and adhere to SBBC' Code of Conduct.
- All staff and volunteers are provided with training on this policy, (in conjunction with training in our Child and Vulnerable People Protection Policy and Inclusion Policy), and guidelines (in Khmer and English) on how to obtain informed consent, how to record and store images, and how images can be published.
- Dedicated staff members are appointed to maintain the storage of images and consent.
- Professional photographers sign and adhere to SBBC' Code of Conduct.
- Photographers are supervised and are without access to individual children.
- Any individuals or organisations working with SBBC on school-based programs are aware of our Images Policy and require them to sign and adhere to SBBC' Code of Conduct.
- There is no identifying personal information accompanying published photographs of children and vulnerable people, such as full names, name of the school, specific geographical location or personal items (in combination).
- Only use images of children that are relevant to the organisation's activities and services, such as children participating in an activity specifically associated with the organisation's programs.

- Parents/guardians (and where possible, the child) are provided with the option to withhold or withdraw consent for their child to be photographed or filmed, or for an image of their child to be published. Consent will continue indefinitely or meet the time limit stated in the consent unless withdrawn by the parent/guardian or the child.
- In so far as possible, consent is obtained from parents/guardians (and where possible, the child) to the publication of images that show the child in a group situation such as a classroom or playground.
- No payment or any other form of compensation are made to subjects or their parents/guardians in exchange for their photograph or video being taken or for their consent or signed release for publication.
- That no use is made of images of children from commercial or other sources for which there is no documented informed consent from the child's parents/guardians, or from the child.

i. **Compliance**: SBBC will comply with the visual identity guidelines supplied by its donors. SBBC will ensure that any implementing partners that the organisation may agree to work with will also comply with these guidelines should a partnership be formed in the future. We will ensure all compliance requirements outlined in the SBBA Communications Policy are upheld.

j. **Use of Funding**: Communications with donors or potential donors must clearly articulate how their funds will be used, highlighting the definition of restricted or unrestricted, and accord with the principles set out in the Fundraising Policy. For clarity, we have detailed our definitions of these two types of funding below:

i. **Restricted Funds -** All funds donated under contract with a restriction on use. Implications of use in the application phase are not guaranteed unless specified in signed documentation.

ii. **Unrestricted Funds -** Funds that can be directed to any area that SBB chooses, including and not limited to operating expenses and overheads.

Where funds may be used for a variety of purposes at the discretion of SBBC (i.e. unrestricted funds), no assertions will be made that the funds will be used for a specific activity or activities. Rather the language used will make it clear that the charity will direct funds to the areas/activities in most need in order to ensure that operations are maintained and can grow as a result of such donations. A link to the website will be provided where details of all activities can be obtained. An agreement will be drawn up for donors as required, which will encompass all of the points above.

In campaigns or grant applications, examples of projects or activities may be used for illustrative purposes, but this does not guarantee a specific use unless the donor makes a specific request and SBBC subsequently signs an agreement acknowledging our responsibility in this regard.

4.3 Responses to Requests for Information:

Requests for information should be passed to the relevant SBBC representative or staff member as appropriate. If communicators are responding to a specific request for information and are not certain of the veracity of an assertion or do not have the requisite information, they will acknowledge their position and refrain from comment. Instead, they will refer the matter to the appropriate person within SBBC.

Communicators will also refrain from commenting where they are being asked for an opinion or to speculate on an outcome unless they have been specifically allocated that area of responsibility and also have permission to comment from the designated personnel or the Board.

4.4 Responses to Enquiries from the Media:

Media management is the responsibility of the Board in the first instance and delegated to the CEO of International Operations or, in particular instances, to the person designated by the CEO for international media. For local media the responsibility is delegated to the Managing Director. Individuals are not authorised to respond to questions from the media on any subject unless as part of a particular campaign that has been approved by the designated personnel.

4.5 Communications Regarding other NGOs:

While implicit already in this Policy Statement and embedded in SBB's values, specific reference is made to communications relating to other NGOs. At times the actions of other NGOs may appear to be competitive or lack the spirit aimed for by the philosophy or values of SBB. It is essential that no such appearance is given in any communications. On the contrary, recognition of the positive impacts from the work of others is always the stance to be taken. Communications must ensure that communications are respectful and do not degenerate other agencies or make inaccurate or misleading public statements concerning their work for any reason including obtaining a reputational or other advantage for SBBC.

4.6 Annual Reporting:

SBBC will use its annual report as a key part of its accountability to all stakeholders. A written annual report will be produced and made available as a downloadable document from the website

to all stakeholders including staff, volunteers, supporters, partner agencies and members of the public. Key stakeholders will be notified upon the publication of an Annual Report.

The annual report will provide stakeholders with:

a. A description of SBBC' purpose, objectives aims and values;
b. A plain-language summary of income and expenditure and overall financial health;
c. A description of the most significant aid and development activities undertaken during the reporting period and their impact; and
d. Information about evaluations into effectiveness of and the learning from aid and development activity as conducted during the period.

The annual report will also specifically include:

a. A report by the management and/or the Directors or Trustees;
b. Financial statements prepared in accordance with the requirements of all domestic and international codes SBBC follows;
c. Identification of the ability to lodge a complaint against SBBC and a point of contact in that regard.

4.7 Financial Statements:

In compliance with Cambodian Law, SBBC will publish financial statements in their annual report which will contain:

a. Financial statements prepared in accordance with the Cambodian Law on Associations and Non-Governmental Organisations (LANGO) and the accompanying Financial Definitions. This requirement is notwithstanding any statutory requirements.
b. Additionally we adhere to the financial compliance requirements of our International Partners: SBBI, SBBA and SBBUK.
c. A reference to the availability of the full financial report (if the full financial report is not included in the annual report).

SBB will ensure that in any reference to financial performance, stakeholders are made aware of their right to access the full financial reports. SBBC will comply namely:

1. Where SBBC publishes any shortened version of said Financial Report in the annual report, the annual report will make it clear that the full financial report is available on request.
2. Any other publications that refer to financial performance, in summary, in an extract of detail or in commentary, will make it clear that the full financial report is available on request.

5. POLICY MANAGEMENT

All policy will include the following policy management statement and policy management table at the end of the document and the the approving minutes will be used as approval evidence:

This policy has been approved by the General Manager Shared Services and the Managing Director 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 Managing Director. Recommendations for minor changes can be approved by the General Manager Shared Services before the Managing Director review every three years.

This policy and any amendments have also been reviewed by the SBBC Board, as noted below.

Doc Ref	Doc Type	GM-Shared Services	Managing Director	Board Review	Minute Ref
COMMP/05/2025/V1.0	Policy	Approved/20250516	Approved/20250515		Email