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StudyBeyondBorders Organisation

POLICY

FUNDRAISING POLICY

Change begins with Education



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SBBC FUNDRAISING POLICY

1. STUDYBEYONDBORDERS IN CAMBODIA OVERVIEW

StudyBeyondBorders in Cambodia (**SBBC**) is a local Cambodian non-government organisation operating in rural areas of Battambang, Oddar Meanchey, 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. PURPOSE

The purpose of this Policy is to establish the principles, responsibilities and requirements governing fundraising activities undertaken by or on behalf of StudyBeyondBorders Cambodia (SBBC).

Fundraising enables **SBBC** to achieve its Vision of Cambodian children empowered by education and its Mission to enable quality teaching and learning at school. Fundraising activities may be undertaken directly by **SBBC** or in collaboration with members of the **SeeBeyondBorders** Alliance. **SBBC** may support Alliance fundraising activities through the development of funding proposals, donor reports, budgets, monitoring and evaluation data, research, communications and other fundraising-related activities that contribute to educational outcomes in Cambodia.

This Policy supports the implementation of *the SBBC Strategic Plan 2026–2029* by ensuring fundraising activities contribute to:

- Transforming teaching quality, school leadership and student learning outcomes.
- Strengthening sustainable district-level education systems and local ownership.
- Supporting research, advocacy and evidence-informed policy development.
- Maintaining strong governance, accountability and organisational capability.
- Supporting collaboration across the SeeBeyondBorders Alliance.

SBBC is committed to conducting fundraising activities ethically, transparently, responsibly and in a manner consistent with its values, strategic priorities, legal obligations and donor requirements.

This Policy forms part of **SBBC's** governance framework and should be read in conjunction with other relevant organisational policies and procedures.

3. SCOPE

This Policy applies to all fundraising activities undertaken by or under the authority of **SBBC** and to all individuals and organisations involved in, supporting, or representing **SBBC** in fundraising activities, including:

- Board of Trustees
- Employees
- Volunteers
- Consultants and contractors (paid or voluntary)
- Third-party fundraisers
- Partner organisations and other individuals undertaking fundraising activities on behalf of **SBBC**.

4. FUNDRAISING COMMITMENTS

SBBC is committed to fundraising that is ethical, respectful, transparent and aligned with its Vision, Mission, Values and Strategic Plan.

Fundraising activities will:

- Support locally identified priorities and solutions.
- Respect the dignity, agency and rights of children, vulnerable people, educators and communities.
- Promote equitable and locally led partnerships.
- Build long-term relationships with donors and supporters based on trust and transparency.
- Ensure funds are managed responsibly and used consistently with donor intent and organisational priorities.
- Support the long-term sustainability of **SBBC** and its educational mission.

SBBC welcomes support from individuals, trusts, foundations, corporations, governments and institutions whose values and activities are broadly consistent with the organisation's purpose and ethical commitments. **SBBC** will seek to maintain an appropriate balance of funding sources to support organisational sustainability and reduce reliance on any single donor.

5. DEFINITIONS

Donor : Any individual, organisation, trust, foundation, corporation, government entity or other party that provides financial or in-kind support to **SBBC**.

Funds : Money, grants, donations or other financial or in-kind resources received by **SBBC**.

Fundraising	: Activities undertaken by or on behalf of SBBC for the purpose of seeking, receiving or managing donations, grants, sponsorships, gifts or other forms of financial or in-kind support.
In-Kind Support	: Non-financial contributions provided to SBBC , including goods, services, professional expertise, venue hire, technology, travel or other resources.
Restricted Funds	: Donations, grants or other contributions subject to agreed conditions or designated purposes.
Unrestricted Funds	: Donations or income that may be applied to areas of greatest organisational need consistent with SBBC 's purpose.
Third-Party Fundraiser	: An individual, group or organisation authorised to raise funds on behalf of SBBC but not directly employed by SBBC .
SBBC Personnel	: All individuals covered by the scope of this Policy.

6. RESPONSIBILITIES

Board of Trustees

- Oversight of fundraising governance and accountability.
- Monitors significant fundraising-related risks.
- Review a bi-annual fundraising report covering fundraising performance, significant donor relationships, key risks and other material fundraising matters.
- Approves fundraising policies.

Managing Director

- Ensures this Policy is implemented.
- Supports fundraising collaboration across the **SeeBeyondBorders Alliance**.
- Ensures appropriate fundraising systems, controls and oversight are in place.

Employees and Representatives Involved in Fundraising

- Undertake fundraising activities in accordance with this Policy.
- Contribute to fundraising activities undertaken by **SBBC** and, where appropriate, support fundraising efforts led by other **SeeBeyondBorders Alliance** entities, including the development of funding proposals, donor reports, budgets and supporting documentation.
- Comply with donor requirements, funding agreements and reporting obligations, and maintain accurate fundraising records.
- Protect donor information and confidentiality.

7. FUNDRAISING PRINCIPLES

6.1. Alignment with Strategic Priorities

Fundraising activities will support the achievement of **SBBC's** Strategic Plan and organisational objectives.

Funding priorities may include:

- Teacher and school leader development.
- Student learning outcomes.
- Teacher Development Centres.
- Research and advocacy.
- Organisational strengthening.
- Governance and accountability systems.
- Innovation and scale-up opportunities.

6.2. Localisation and Locally Led Development

SBBC recognises that sustainable change is achieved through local ownership and leadership.

Fundraising activities will:

- Respect local voices and culture.
- Support Cambodian leadership and decision-making.
- Strengthen local systems and institutions.
- Promote equitable partnerships.
- Avoid donor-driven activities that undermine local priorities.
- Comply with **SBBC** Development Policy and relevant policies such as Working with Partners Policy.

6.3. Evidence-Based Fundraising

Fundraising communications must:

- Be based on verified information and evidence.
- Accurately represent achievements and challenges.
- Avoid exaggeration or misleading claims.
- Responsibly communicate program results and research findings.

6.4. Truthfulness and Accuracy

Fundraising materials and communications must:

- Accurately identify **SBBC**.
- Clearly communicate fundraising purposes.
- Avoid misleading statements or omissions.
- Accurately represent programs and intended outcomes.

6.5. Third-Party Fundraising

Where fundraising activities are undertaken by third parties:

- Appropriate authorisation must be obtained.
- Arrangements should be documented.
- Activities must comply with this Policy.
- **SBBC** retains oversight of activities undertaken in its name

6.6. Legal and Regulatory Compliance

SBBC will seek to comply with:

- Cambodian laws and regulations.
- Donor funding agreements.
- Anti-corruption and counter-terrorism requirements.
- Safeguarding obligations.
- Privacy and data protection requirements.
- Other relevant legal and regulatory obligations.

6.7. Disclosure of Fundraising and Administration Costs

SBBC recognises that governance, management, safeguarding, monitoring, evaluation, fundraising and operational costs are legitimate and necessary components of delivering sustainable education programs.

SBBC will not knowingly imply that program delivery occurs without associated organisational costs.

8. FUNDRAISING ACTIVITIES

SBBC may undertake fundraising activities, including:

- Institutional grants.
- Trusts and foundations.
- Corporate partnerships.
- Major donor fundraising.
- Individual giving.
- Community fundraising.
- Digital fundraising.
- Events and campaigns.
- Matched funding initiatives.
- Legacy giving.
- In-kind support.

All fundraising activities must be appropriately aligned with this Policy.

9. RESTRICTED AND UNRESTRICTED FUNDS

Restricted funds will be managed in accordance with the relevant donor agreement, including agreed scope, budget, timeframe and requirements relating to amendments or unspent funds. Where material changes may affect the intended use of restricted funds, **SBBC** will seek donor approval where required.

Unrestricted funds may be used to support:

- Program delivery.
- Research and advocacy.
- Governance and compliance.
- Safeguarding systems.
- Monitoring, Evaluation, Accountability and Learning (MEAL).
- Fundraising and donor stewardship.
- Organisational strengthening.
- Operational and administrative costs.
- Building organisational reserves.

SBBC will maintain appropriate financial records and approvals and communicate transparently regarding the use of restricted and unrestricted funds.

10. DONOR COMMUNICATIONS AND PRIVACY

9.1. Donor Communications

Communications with donors and prospective donors must be respectful, truthful, transparent and consistent with this Policy and other relevant organisational policies, including Communications Policy and any Data Sharing Agreements in force

SBBC will seek to ensure that fundraising communications:

- accurately represent the organisation, its programmes and its funding needs
- clearly communicate the purpose of fundraising activities where relevant
- avoid misleading, deceptive or exaggerated claims
- appropriately communicate the use and impact of donated funds
- support the development of positive, long-term relationships with donors and supporters

Donor recognition and visibility will be managed in accordance with the relevant grant or donor agreement and **SBBC's Communications and Image Policies**. Any agreed recognition and visibility requirements will be recorded in **SBBC's Grants Management Spreadsheet**.

Fundraising communications must be consistent with **SBBC's** values, safeguarding commitments and commitment to ethical fundraising practices.

9.2. Ethical Storytelling and Images

SBBC is committed to respectful, ethical and safeguarding-informed communications.

Fundraising materials and communications must:

- Contextually portray children, educators and communities with dignity and respect
- Avoid stereotypes, sensationalism or exploitative representations
- Recognise teachers, school leaders and communities as active participants and agents of change
- Accurately reflect the context and purpose of **SBBC's** work

- Be developed and used in accordance with safeguarding, privacy and consent requirements

The collection and use of stories, images and other personal information for fundraising purposes must comply with relevant organisational policies and procedures.

9.3. Donor Privacy and Confidentiality

SBBC respects the privacy and confidentiality of donors and is committed to the responsible management of personal information.

The organisation will:

- Protect donor information from unauthorised access, disclosure or misuse
- Manage personal information in accordance with applicable legal and regulatory requirements
- Maintain the confidentiality of donor information unless disclosure is authorised or legally required
- Respect donor preferences regarding communications and anonymity where practical
- Not sell or improperly disclose donor information to third parties

Donors may request not to be publicly acknowledged, while their identity and donation details remain known to and appropriately recorded by **SBBC**.

Anonymous donations, where the donor's identity is not known to **SBBC**, will be subject to appropriate due diligence and approval requirements in accordance with ***the Donor Due Diligence and Approval Matrix***.

Donors may raise concerns or complaints regarding fundraising activities, communications or privacy matters in accordance with **SBBC's Complaints and Feedback Handling Policy**.

11. FINANCIAL MANAGEMENT AND ACCOUNTABILITY

SBBC maintains accurate financial records and appropriate controls over fundraising income and expenditure.

Funds will be managed in accordance with:

- Donor agreements.
- Financial policies and procedures.
- Approved budgets.
- Audit requirements.

10.1. Interest on Donated Funds

Interest earned on restricted funds will be managed in accordance with donor requirements where applicable.

10.2. Currency Management

SBBC may receive and manage funds in multiple currencies. Exchange rate risks will be monitored and managed through financial planning and budgeting processes.

12. ACCEPTANCE AND REFUSAL OF DONATIONS

SBBC welcomes support from donors whose values and activities are broadly consistent with the organisation's Vision, Mission and Values.

Donations may be declined where acceptance may:

- Conflict with organisational values or purpose.
- Compromise organisational independence.
- Create safeguarding concerns.
- Create legal or regulatory risks.
- Create unacceptable reputational risks.
- Be associated with corruption, fraud, exploitation, modern slavery, terrorism or other unlawful activities.
- Be derived from activities that are inconsistent with SBBC's commitment to inclusive and quality education, child and vulnerable people safeguarding, human rights, environmental responsibility or ethical conduct.

11.1. Due Diligence and Risk Assessment

SBBC may undertake proportionate due diligence on significant donors, sponsors and funding partners. Assessments may consider:

- | | |
|---|--|
| • Donor Identity and ownership/control, including individuals who hold operational control of organizational entities | • Ethical and human rights considerations |
| • Reputation and public perception | • Safeguarding risks |
| • Legal and regulatory compliance | • Environmental and social impacts |
| • Source of Funds, and where appropriate, source of wealth | • Alignment with SBBC's values and strategic priorities |

All donors will be checked against a **Counter Terrorism/Sanctions Checklist**. See details in the **SBBC Counter Terrorism Policy**.

SBBC maintains a Donor Due Diligence and Approval Matrix setting out donor and funding types, associated risk levels, due diligence and financial thresholds, and the responsible authority for oversight and approval. Higher-risk funding opportunities will be escalated in accordance with the Matrix.

13. RELATED POLICIES

This Policy should be read in conjunction with all relevant **SBBC** policies

- Business Continuity Policy
- Code of Conduct
- Child and Vulnerable Protection Policy
- Communication Policy
- Complaint and Feedback Handling Policy
- Counter Terrorism Policy
- Development Policy
- Ethical Standard Policy
- Financial Wrongdoing Prevention and Awareness Policy
- Gender Equality, Disability and Social Inclusion Policy
- Image Policy
- Reserve Policy
- Risk Management Policy
- Strategy Plan
- Volunteer Policy
- Whistleblowing Policy
- Working with Partner Policy

14. 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	FRP/09/2026/V1.0
Executive Owner	The Managing Director
Policy Manager	The Possibilities Lead
Effectiveness Approval Body	SBB Cambodia Board
Date Approved	18/September/2026
Effective Date	18/September/2026
Next Formal Review	18/September/2029
Version Number	V1.0

Annex 1: Donor Due Diligence and Approval Matrix

Donor / Funding Type	Indicative Risk	Financial / Risk Trigger	Due Diligence Required	Approval
Individual donor	Low	Up to \$5,000	Counter Terrorism/Sanctions Checklist	Possibilities Lead
Major individual donor	Low–Medium	Over \$5,000	Counter Terrorism/Sanctions Checklist, basic due diligence	Possibilities Lead
Trust or foundation	Low–Medium	Any grant	Counter Terrorism/Sanctions Checklist, due diligence, donor requirements, contractual and compliance risks	Possibilities Lead + MD
Government / institutional donor	Low–Medium	Any grant	Counter Terrorism/Sanctions Checklist, due diligence, donor requirements, contractual and compliance risks	MD
Corporate donor/sponsor	Medium	Any amount	Counter Terrorism/Sanctions Checklist, company activities, enhanced due diligence, contractual, and alignment	Possibilities Lead + MD
In-kind donor	Low–Medium	Material donation	Sanctions check; suitability, value, conditions, safety and ongoing costs	MD
Anonymous donor	Medium–High	Above \$5,000	Counter Terrorism/Sanctions Checklist/source checks as far as possible, reason for anonymity	MD
Higher-risk donor or sector	High	Any amount	Enhanced due diligence and documented risk assessment	MD; Board if significant risk
Donation with unusual or potentially problematic conditions	High	Any amount	Review restrictions, independence, legal/financial implications and reputational risk	MD; Board if significant risk