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StudyBeyondBorders Organisation

Whistleblowing Policy

Change begins with Education

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WHISTLEBLOWING POLICY

1. STUDYBEYONDBORDERS 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

At all times SBBC seeks to conduct its activities professionally, honestly and with integrity. However, all organisations face the risk of unprofessional conduct, criminal behaviour or mismanagement. We believe it is our responsibility to take appropriate measures to identify such situations and attempt to remedy them.

We are committed to fostering a culture where staff, interns, volunteers and other SBBC personnel such as contractors and Board trustees, are encouraged to raise concerns about unethical and unacceptable conduct and can do so in a safe environment.

The purpose of this policy is to strengthen our core values by empowering all SBBC personnel who wish to report any wrongful acts in good faith.

3. DEFINITIONS

Whistleblowing deliberate, voluntary disclosure of individual or organisational wrongdoing by a person who has access to data, events or information about an actual, suspected or anticipated wrongdoing within the organisation.

Whistleblower SBBC personnel who attempt to make or wish to make a report in connection with a wrongful act under this policy and who wish to avail themselves of the protections offered by this policy.

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Wrongful act includes, but is not limited to:

- Breaches of legal obligations (including negligence, breach of contract, breach of administrative law);
- Criminal offences;
- Mismanagement of funds;
- Actual or suspected fraud and or corruption;
- Abuse of authority;
- Health and safety risks, including risks to the public as well as other employees;
- Damage to the environment;
- The unauthorised use of organisational funds and or assets;
- Sexual, verbal or physical violence/abuse;
- Other unethical conduct; or
- The concealment of any of the above.

Staff and volunteers are people who hold contracts with SBBC, whether this be a permanent contract, fixed term contract or volunteer agreement.

Personnel are staff, volunteers, Board trustees and other contractors.

4. POLICY AND POLICY PRINCIPLES

4.1. POLICY

SBBC seeks to provide its personnel with a supportive work environment in which they feel able to raise issues of legitimate concern. We will take steps to protect personnel from detrimental treatment or dismissal if they report actual or suspected wrongful acts in good faith. We undertake to act in accordance with relevant legislation on disclosure of wrongful acts in the workplace.

At present, the Anti-Corruption Law in Cambodia contains very limited protection for whistleblowers and therefore the Corporations Act 2001 (Australia) will protect whistleblowers in SBBC.

4.2. POLICY PRINCIPLES

- All SBBC personnel have an obligation to report wrongful acts or suspected wrongful acts in accordance with this policy
- All SBBC personnel have the right to speak freely and honestly to report wrongful acts in a safe environment without fear of retaliation or reprisal
- SBBC responds in a timely, respectful and confidential manner to all disclosures of wrongful acts
- SBBC will prosecute or apply other appropriate sanctions against those who have committed a wrongful act.

5. POLICY IN ACTION

5.1. REPORTING A WHISTLEBLOWING CONCERN

Whistleblowing concerns should be reported, in good faith, to a member of the SBBC Leadership Team, or to any Board member. Appendix A of this Policy contains full details of who to report to.

The whistleblower must not approach individuals involved in their disclosure directly (whether to “tip them off” or otherwise) or attempt to investigate the matter(s) personally.

5.2. INVESTIGATION OF A WHISTLEBLOWING CONCERN

The responsible person to whom the disclosure is made will:

- Make a detailed record of the disclosure.
- Ask the whistleblower to provide a written statement describing the precise nature of the allegations.
- Upon receipt of the written statement, refer it to the appropriate person (a member of the Senior Leadership Team, or any member of the Board) and write to the employee within 5 (five) working days of making that referral. In their letter, they will acknowledge receipt of the complaint, provide information on who it has been referred to and details of who the employee should contact if they have any further questions.
- Return completed documents to the General Manager Shared Services for recording and follow up.

Where further action is required, this will in the first instance take the form of an internal investigation. The internal investigator will be a member of the Senior Leadership Team or any member of the Board (as appropriate on a case by case basis).

Once the investigation is completed, the whistleblower will be given a prompt and thorough explanation about the result of the investigation and any actions SBBC is likely to take as a result of it. Where the allegation is considered to be of a serious nature, a report will be prepared for the Board. On occasion, the involvement of external authorities may be required.

5.3. CONFIDENTIALITY

If a wrongful act or a suspected wrongful act is reported under this policy, SBBC will endeavour to protect the whistleblower’s identity. In order not to jeopardise the investigation into the alleged wrongful act, the whistleblower is also expected to keep the fact they have raised a concern, the nature of the concern and the identity of those involved confidential.

Generally, SBBC will not disclose the whistleblower’s identity unless:

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- The whistleblower consents to the disclosure;
- The disclosure is required or authorised by law, and/or
- The disclosure is necessary to further the investigation and the whistleblower consents.

Mostly, reports made under this policy will be treated confidentially. However, when a report is investigated it may be necessary to reveal its substance to people such as other SBBC personnel, external persons involved in the investigation process and, in appropriate circumstances, law enforcement agencies. At some point, it may also be necessary to disclose the fact and the substance of a report to the person who is the subject of the report.

SBBC will take reasonable precautions to store any records relating to a report of a wrongful act securely and to permit access by authorised personnel only.

Unauthorised disclosure of information relating to a report, the identity of the whistleblower or information from which the identity of the whistleblower could be inferred will be regarded as serious misconduct and may result in disciplinary action, which may include dismissal.

5.4. PROTECTION OF WHISTLEBLOWERS

No person who raises genuinely held concerns in good faith under this policy will be dismissed or subjected to any detriment as a result of such action, even if the concerns turn out to be unfounded. Detriment includes, but is not limited to, unwarranted disciplinary action and victimisation in any of the following forms:

- dismissal
- demotion
- any form of harassment
- discrimination
- current or future bias
- threats of any of the above

Any such retaliatory action will be treated as serious misconduct and will result in disciplinary action, which may include dismissal. If a whistleblower believes retaliatory action has occurred or has been threatened, the whistleblower has the right to make a submission to the Board of Trustees. The Board is independent of management and can arbitrate the matter.

5.5. WHISTLEBLOWERS IMPLICATED IN A WRONGFUL ACT

Even though a whistleblower may be implicated in the wrongful act, they will not be subjected to any actual or threatened retaliatory action or victimisation in reprisal for making a report under this policy.

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However, making a report will not necessarily shield the whistleblower from the consequences flowing from that person's involvement in the wrongful act. In some circumstances an admission may be a mitigating factor when considering disciplinary or other action.

5.6. FALSE DISCLOSURE

SBBC treats all disclosures of wrongful acts seriously and protects staff who raise concerns in good faith. However, while protection is provided to whistleblowers under this policy, deliberate false reports will not be tolerated and anyone found making a deliberate false claim or report will be subjected to disciplinary action, including dismissal.

5.7. COMMUNICATION WITH THE WHISTLEBLOWER

The whistleblower is to be kept informed of the progress of the investigation. The whistleblower will be informed of the outcomes of the investigation, subject to the considerations of privacy of those against whom the allegations have been made.

5.8. MANAGEMENT OF A PERSON AGAINST WHOM A REPORT IS MADE

Generally, the person who is the subject of any report that is investigated, will:

- be informed as to the substance of the allegations;
- be given the opportunity to answer the allegations before any investigation is finalised;
- be informed about the substance of any adverse comments that may be included in any report arising from the investigation before it is finalised;
- have their defence set out fairly in any report.

SBBC recognises that individuals against whom a report is made must also be supported during the handling of an investigation of the alleged wrongful act. SBBC takes reasonable steps to ensure the person who is the subject of a report is treated fairly, particularly during the assessment and investigation process. Support provided by SBBC may include referral for counselling.

6. RELATED POLICIES

- Financial Wrongdoing Policy
- Complaints and Feedback Handling policy
- Safeguarding Policy
- Child and Vulnerable Protection Policy

POLICY

7. POLICY MANAGEMENT

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
WSBP/02/2026/V1.0	Policy	Approved/20/Feb/2026	Approved/25/Feb/2026	Reviewed/Feb/2026	

APPENDIX A – REPORTING PROCEDURES

If you witness or suspect anything that causes you concern, please report it immediately to the responsible person named below, who will investigate further.

Child Protection, Safeguarding or Sexual Exploitation, Abuse or Harassment Reporting

Bros MIEN <i>Child Protection officer</i>	bros.mien@seebeyondborders.org 088 516 5111/017 573 965
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Taing Im Lok <i>General Manager-Shared Services</i>	taing_im.lok@seebeyondborders.org 089 817 877/097 2559 558
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Financial Wrongdoing or Whistleblowing reporting

Chantoeu HOEU <i>Finance Manager</i>	chantoeu.hoeu@seebeyondborders.org 069 782 607
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Complaints, Feedback or Communications reporting

Sreyphet PHAN <i>Provincial Manager</i>	sreyphet.phan@seebeyondborders.org 012 518 599
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Bullying, Harassment, Discrimination Grievances, or any Safety, or Security concerns

Makara RIN <i>Human Resources Manager</i>	makara.rin@seebeyondborders.org 097 522 2468
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All of these concerns, as well as any others, can also be reported to any of the following persons

Pov PHEUNG <i>Managing Director</i>	pov@seebeyondborders.org 092 223 253
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Taing Im Lok <i>General Manager-Shared Services</i>	taing_im.lok@seebeyondborders.org 089 817 877/097 2559 558
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Phath BLUNG <i>General Manager Programs</i>	phath@seebeyondborders.org 012 474 606
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Mike Moller <i>Acting Board Chairperson</i>	mike.moller@seebeyondborders.org
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