



POLICY

CODE OF CONDUCT

Change begins with Education

TABLE OF CONTENTS
Contents

1	DOCUMENT PURPOSE.....	3
2	GENERAL POLICY OBJECTIVES.....	3
3	INTRODUCTION.....	3
4	PERSONAL AND PROFESSIONAL BEHAVIOUR.....	4
4.1	Our responsibilities	4
4.2	Fraud and Corruption	4
4.3	Unethical/illegal behaviour	5
4.4	Use of Alcohol	5
4.5	Drug possession or use	5
4.6	Smoking	5
4.7	Prohibition on Transactional Sex	5
4.8	Prohibition on Fraternisation	6
4.9	Child Protection & Safeguarding	6
4.10	Donations, Grants and Money Received in Aid	8
4.11	Conflicts of Interest	8
4.12	Public Comment	9
4.13	Use of SeeBeyondBorders Resources	9
4.14	Acceptance of Gifts and Benefits	9
4.15	Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH)	9
4.16	Responsibilities after Leaving SeeBeyondBorders	10
4.17	Bribery	10
4.18	Working with Partners	10
5	ADDITIONAL RESPONSIBILITIES FOR THOSE ON OVERSEAS ASSIGNMENTS/VISITS.....	11
5.1	In the host countries:	11
5.2	With regard to Security and Emergencies:	11
5.3	With regard to Health Management and Insurance:	11
5.4	With regard to Reputation and Representation:	11
5.5	With regard to Conflict Resolution	11
5.6	Complaints	11

POLICY

6 RESPONSIBILITIES OF MANAGERS..... 12

7 BREACHES OF THIS POLICY & SAFE REPORTING OF WRONGDOING (WHISTLE BLOWING) 12

8 DESIGNATED BOARD MEMBER 12

9 POLICY MANAGEMENT 13

Appendix A – Reporting Procedures 15

CODE OF CONDUCT

1 DOCUMENT PURPOSE

This document sets out the code of conduct expectations, both professional and personal of SeeBeyondBorders Personnel.

This policy applies to all SeeBeyondBorders Personnel, defined as:

- board members and 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 SeeBeyondBorders.

This policy also applies to other individuals and third parties who through their association with SeeBeyondBorders may visit our project activities (i.e. donors, Australian and UK Partner Organisations, service providers) although the management process for these groups may differ in certain aspects given their involvement.

2 GENERAL POLICY OBJECTIVES

This Code of Conduct Policy document (“Policy”) is designed to ensure that all SeeBeyondBorders Personnel are made aware of their obligations and responsibilities as part of, or as representing the organisation.

3 INTRODUCTION

It is not possible or practical to prescribe behaviour in every circumstance; rather SeeBeyondBorders 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 SeeBeyondBorders.

For those on overseas assignments, by accepting the intent of the code and through complying with its provisions, SeeBeyondBorders Personnel acknowledge their status as representatives of their home community/nation within local communities overseas.

All SeeBeyondBorders Personnel whether beginning employment or on a short term assignment, including as a project team participant or visitor must understand and acknowledge the content of the code by signing the declaration in advance of travel to Cambodia or visit to a project.

Compliance with the code helps to:

- Maintain public trust and confidence in the integrity and professionalism of SeeBeyondBorders;
- Continue public confidence within Cambodia, Australia and the UK of the integrity and efficacy of SeeBeyondBorders programs;
- Ensure that the program is effectively implemented in line with the aims and objectives of SeeBeyondBorders.

Failure to comply with the code may lead to the withdrawal of a person from SeeBeyondBorders programs and/or termination of contract with SeeBeyondBorders.

Personnel who have been convicted of any criminal offences relating to child abuse, sexual misconduct, sexual exploitation, child exploitation, trafficking or sexual harassment will not be accepted by SeeBeyondBorders or will have their contract or association with SeeBeyondBorders terminated immediately upon receipt of evidence of such.

4 PERSONAL AND PROFESSIONAL BEHAVIOUR

4.1 Our responsibilities

As SeeBeyondBorders Personnel, our responsibilities are to:

- a) Comply with all legislative, industrial or administrative requirements within the countries we work or receive funding from, and to be aware of the responsibilities this places on each of us.
- b) Implement and abide by all of SeeBeyondBorders policies.
- c) Comply with any lawful and reasonable directions given by persons in authority.
- d) Maintain and develop knowledge in our professional fields and areas of responsibility.
- e) Exercise our best judgement in the interests of SeeBeyondBorders and our beneficiaries.
- f) Treat everyone with dignity, respect and courtesy; without harassment and with sensitivity to their rights and culture.
- g) Behave ethically and with integrity.
- h) Act with care, diligence and professionalism.
- i) Disclose, and take steps to avoid, any conflicts of interest (real or apparent) and comply with the SeeBeyondBorders Conflict of Interest policy in this regard.
- j) Make decisions fairly and without bias using the best factual information available.
- k) Maintain adequate documentation to support decisions made.
- l) Comply with any and all conditions of access to SeeBeyondBorders communication facilities.
- m) Act responsibly when becoming aware of any unethical behaviour or wrong doing by any other personnel.
- n) Not provide false or misleading information internally or externally.
- o) Not make improper use of internal information or disclose an employee's status, salary, power or authority in order to gain or seek to gain, an advantage for the employee/volunteer or for any other purpose.
- p) Report breaches of this policy including offers of gifts or hospitality that are over and above normal and incidental promotion.
- q) Comply with standards of behaviour outlined in the Anti-Discrimination, Bullying and Harassment Policy and recognise that SeeBeyondBorders has zero tolerance of sexual exploitation, abuse and harassment (SEAH) of any kind.
- r) Conduct themselves at all times to ensure the safeguarding of children and vulnerable people.

4.2 Fraud and Corruption

Any fraudulent or corrupt behaviour will not be tolerated and will result in immediate withdrawal from the programme and/or termination of contract.

Fraud is defined as '*Dishonesty obtaining a benefit, or causing a loss, by deception or other means*' – Commonwealth Fraud Control Framework 2017.

POLICY

<https://www.aq.gov.au/CrimeAndCorruption/FraudControl/Documents/CommonwealthFraudControlFramework2017.PDF>.

For example, it is fraudulent for SeeBeyondBorders to spend money from a donor on anything other than what is agreed or it would be fraudulent to deliberately report the wrong number of teachers in the program.

Corruption is defined as *'the abuse of entrusted power for private gain'* – DFAT Fraud Control and Anti-corruption Plan 2015.

<https://dfat.gov.au/about-us/publications/Documents/fraud-control-anti-corruption-plan.pdf>.

For example, a teacher may mark a student's examination higher to enable them to progress up to the next grade because they are the student's aunt or uncle and they have a personal relationship with the student.

Bribery is a form of corruption and may actually be easier to detect than other forms of corruption. For example, you may be stopped by the police for speeding and you pay the police officer some money instead of the legal fine.

4.3 Unethical/illegal behaviour

Any illegal or unethical behaviour will not be tolerated and may result in immediate withdrawal from SeeBeyondBorders 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.

4.4 Use of Alcohol

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

4.5 Drug possession or use

Unauthorised possession or use of narcotic or illegal hallucinogenic drugs is illegal in all countries. Possession or use of illegal drugs may result in immediate withdrawal from SeeBeyondBorders programs and/or termination of contract.

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

4.6 Smoking

SeeBeyondBorders 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 SeeBeyondBorders.

4.7 Prohibition on Transactional Sex

POLICY

SeeBeyondBorders prohibits transactional sex for all employees and volunteers whilst they are conducting SeeBeyondBorders' business or are in a position to be representing SeeBeyondBorders whether during working hours or outside.

4.8 Prohibition on Fraternalisation

Fraternalisation refers to any relationship occurring in the course of conducting business, that involves — or appears to involve — partiality, preferential treatment or improper use of rank or position including but not limited to voluntary sexual behaviour. It includes sexual behaviour not amounting to intercourse, a close and emotional relationship involving public displays of affection or private intimacy and the public expression of intimate relations.

Where there are significant power imbalances at play (based on gender, age, ability, authority, social and economic inequality, etc.) the potential for exploitative transactional sex and fraternalisation is heightened.

SeeBeyondBorders prohibits fraternalisation for all non-national personnel in the field while engaged in the delivery of SeeBeyondBorders' business or are in a position to be representing SeeBeyondBorders whether during working hours or outside.

4.9 Child Protection & Safeguarding

All SeeBeyondBorders 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 you may be representing SeeBeyondBorders.
- c) Adhere to the SeeBeyondBorders Child Protection and Vulnerable Beneficiary, and Safeguarding Policies.
- d) Acknowledge and accept the guiding principle that protection of the child is in all cases the overriding consideration.

It is a requirement that SeeBeyondBorders Personnel must immediately disclose all charges, convictions and other outcomes of an offence that relates to child exploitation and abuse, including those under traditional law, which occurred before or occurs during their association with SeeBeyondBorders.

SeeBeyondBorders has the right to dismiss or withdraw SeeBeyondBorders Personnel when it considers that the person poses an unacceptable risk to the safety or well-being of children or vulnerable people. If deemed appropriate, SeeBeyondBorders may suspend Personnel or transfer them to other duties as a temporary measure while an investigation is conducted.

SeeBeyondBorders recognises the need to implement specific principles to manage risks relating to the protection of children and vulnerable persons from its volunteer, donors and other visit programs. These principles are as follows:

SeeBeyondBorders' Personnel and partners will:

- Treat every individual with dignity and respect regardless of differences of 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 SeeBeyondBorders.

POLICY

- Immediately raise and report any concerns for the safety or wellbeing of a child with the SeeBeyondBorders' Child Protection & Inclusion Officer/ Safeguarding Focal Point Officer, Country Manager or CEO, in accordance with the SeeBeyondBorders' Code of Conduct and 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 Australian/UK/Irish and local legislation, including labour laws in relation to child labour.

SeeBeyondBorders' Personnel will not:

- 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 beneficiary 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 beneficiary 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 beneficiary.
- Engage any child, children, or vulnerable beneficiaries 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 beneficiary at risk of abuse or harm.
- Behave physically in a manner that is inappropriate or sexually provocative towards a child/vulnerable beneficiary.
- Condone, or participate in, behaviour towards children/vulnerable beneficiaries that is illegal, unsafe or abusive.
- Act in a way that shows unfair differential treatment, or favour towards particular children/vulnerable beneficiaries 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 beneficiary in an inappropriate, unnecessary or culturally insensitive way. Touching should only be in response to the need 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 beneficiaries 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.

POLICY

When photographing or filming a child or using children's images for work-related purposes, SeeBeyondBorders personnel will:

- Obtain informed and documented consent of the child and his / her parents or guardians before photography / filming and provide an explanation on how the photograph / film will be used.
- Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and facts
- Ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form
- Take care to ensure the local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child
- Adhere to the SeeBeyondBorders' Images Policy

Responsibilities where inappropriate behaviour is witnessed

- Where SeeBeyondBorders 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 Child Protection & Inclusion Officer, or if not appropriate or possible, to one of: the Safeguarding Focal Point; Country Manager; Country Director; or any other member of the leadership team WHETHER OR NOT THE PERPETRATOR IS CONNECTED WITH SEEBEYONDBORDERS. The details of what and how to report are included in APPENDIX A. They may then be required to assist with the ensuing investigation.

By signing this Code of Conduct and the Code of Conduct for Children and Vulnerable People (located as Appendix D in the Child & Vulnerable People Protection Policy) you are confirming that you fully understand and will adhere to SeeBeyondBorders Child Protection and Vulnerable Beneficiary, and Safeguarding Policies.

4.10 Donations, Grants and Money Received in Aid

All SeeBeyondBorders 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.

4.11 Conflicts of Interest

SeeBeyondBorders adherence to the principle of respect for the individual which entails a strict regard for the privacy and dignity of each staff member and volunteer. SeeBeyondBorders will therefore not routinely involve itself in the private lives of its staff and volunteers.

However while SeeBeyondBorders recognises that it can be difficult to avoid situations where there is a potential conflict of interest, all staff 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 SeeBeyondBorders interests, and take action to avoid the conflict.

See separate policy statement "Conflict of Interest" for more detail.

4.12 Public Comment

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

4.13 Use of SeeBeyondBorders Resources

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

4.14 Acceptance of Gifts and Benefits

It is unethical for SeeBeyondBorders Personnel to solicit any gifts, benefits or additional money for themselves or another member of SeeBeyondBorders Personnel. Gifts or benefits cannot be accepted, where they might in any way compromise or influence SeeBeyondBorders Personnel in their official capacity. SeeBeyondBorders Personnel must not influence or try to influence colleagues by giving gifts, or offering other inducements.

As a general rule, a line can be drawn beyond which a gift could be seen by others as an inducement, putting a staff member or volunteer under an obligation. Gifts of nominal value that are generally used for promotional purposes by the donor, or moderate acts of hospitality, may be accepted. Gifts of more than nominal value, or benefits, or other inducements offered or received by SeeBeyondBorders Personnel should be reported to a senior member of SeeBeyondBorders staff. If a member of SeeBeyondBorders Personnel is uncertain, they must seek the advice of a senior member of SeeBeyondBorders staff.

As a matter of policy, paying participants in SeeBeyondBorders programs or visiting donors will be discouraged from giving staff tips or gifts. If despite this discouragement, any gift is received after the fact by a member of SeeBeyondBorders staff or a volunteer in appreciation of their attention to their work, this must be reported to management and kept in a pool by Finance for the general benefit of all staff. Where this is a financial reward, this will typically be used towards funding an annual retreat that will be for the benefit of all staff.

Allowances received in excess of the normal SeeBeyondBorders allowances, by staff attending functions such as conferences as sponsored by third parties (such as UNESCO), must be reported to management and submitted to Finance for pooling for the benefit of all staff as per legitimate gifts or tips as discussed above.

A register will be kept of all gifts received and anyone receiving a gift has a responsibility to ensure it is recorded on the register.

4.15 Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH)

SeeBeyondBorders 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. SeeBeyondBorders 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 A.

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

4.16 Responsibilities after Leaving SeeBeyondBorders

SeeBeyondBorders Personnel must not disclose any information or knowledge about the organisation or its program and projects, which may be confidential, sensitive or protected, after leaving SeeBeyondBorders.

Former members of staff and volunteers should not use or take advantage of personal, confidential or official information they have obtained in their capacity as SeeBeyondBorders staff or volunteers. Furthermore, all SeeBeyondBorders Personnel must be careful in their dealings with former staff members and make sure they do not give them favourable treatment or access to personal, confidential or official information. In particular SeeBeyondBorders Personnel may not provide official references to former employees unless so authorised by the Country Manager or the CEO.

SeeBeyondBorders staff and volunteers must not use their position to advance their prospects for future employment, or allow their work to be influenced by plans for, or offers of, external employment where so doing would conflict with or compromise in any way the best interests of SeeBeyondBorders.

4.17 Bribery

While bribery is briefly defined in section 4.2 above, it is also implicit in a number of other sections of the Code including those relating to the use of SeeBeyondBorders resources or donated funds, the making or receiving 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 from SeeBeyondBorders programs and/or termination of employment contract.

4.18 Working with Partners

With respect to arrangements with Partners as defined in our Working With Partners Policy and also with other definitions of partner that embrace any activity conducted jointly for or on behalf of SeeBeyondBorders, the following principles apply relating to the Code of Conduct. In particular the principles relating to inclusion as well as the protection and safeguarding of children and vulnerable people apply:

- For clarity, wherever SeeBeyondBorders establishes a formal agreement with another individual, contractor, or organisation to work as a partner in implementing its programs or undertaking a project involving children and or vulnerable people, it will ensure that the relevant partner has processes and procedures that will provide at least a similar level of protection of children and vulnerable people as contained herein.
- Where a partner does not have the requisite policy and procedures in place, SeeBeyondBorders may choose either to not work with them or to assist them to build their capacity and introduce the necessary protection mechanisms before undertaking any work with them.

5 ADDITIONAL RESPONSIBILITIES FOR THOSE ON OVERSEAS ASSIGNMENTS/VISITS

5.1 In the host countries:

- a) Abide by all the laws and regulations of the host country.
- b) Avoid involvement in party politics and refrain from public comment and /or demonstrations on political, cultural and religious matters. In particular, be mindful of the risks of terrorism and ensure that you do not participate in any activities that may have links, directly or indirectly with any terrorism-related individuals, groups, or activities.
- c) Respect the symbols of nationalism and religious practices.
- d) Do not promote or attempt to convert any participants or persons in the host country to a particular religion or system of beliefs.

5.2 With regard to Security and Emergencies:

- a) If possible, register and update personal details with your home Embassy or High Commission.
- b) Monitor and take account of the regular travel advisories issued by yours or any other person's home government.
- c) Exercise all reasonable caution when undertaking any activities that may result in harm or injury to yourself or others.
- d) Follow any reasonable instruction by SeeBeyondBorders (or its agent) with regard to any SeeBeyondBorders security arrangements including adhering to all SeeBeyondBorders standard operating procedures, critical incident policy and procedures and workplace health and safety policy and procedures.

5.3 With regard to Health Management and Insurance:

- a) Accept responsibility for your own health management.
- b) Be responsible for your own health and travel insurance when travelling away from your home country.

5.4 With regard to Reputation and Representation:

- a) Refrain from any conduct or wrong-doing, which may bring SeeBeyondBorders and/or any of SeeBeyondBorders donors and supporters into disrepute.
- b) Do not issue public statements in any way related to the activities or interests of the Governments of Australian, the UK or the host country.

5.5 With regard to Conflict Resolution

If a grievance or concern arises during an overseas program or project, the affected member or members is/are to notify the nominated SeeBeyondBorders team leader as soon as practicable. Further, they should refer any irreconcilable disputes or unresolved concerns regarding directions, child protection and safeguarding concerns, or advice received during the project to a representative of the SeeBeyondBorders leadership team.

5.6 Complaints

Become familiar with the SeeBeyondBorders complaints process. Complaints can be made in a number of ways including by email, in writing or verbally as explained in our Complaints Handling policy which is on our website under Resources/ Policies. Complaints can also be made direct to the relevant regulatory body (see Appendix A).

6 RESPONSIBILITIES OF MANAGERS

Managers' responsibilities include, but are not limited to:

- a) Ensuring that SeeBeyondBorders Personnel have access to copies of the Code of Conduct and other relevant documents and policies.
- b) Ensuring that staff and volunteers maintain high standards of conduct in the workplace.
- c) Supporting personnel who disclose information regarding corrupt/improper conduct.
- d) Taking all necessary steps to resolve any conflicts that arise in the workplace/the field and ensuring any conflict is avoided in the future.
- e) Appropriately recording all reports of actual or potential conflicts of interest and all directions given about handling each case.

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

Where an individual becomes aware of a breach of this Policy, they should report that breach to a member of SeeBeyondBorders leadership team as they consider appropriate. The reporting of wrongdoing is to be treated by all staff with the greatest respect. SeeBeyondBorders will take all reasonable steps and do all things necessary to protect those who make disclosures from any detrimental action in reprisal for the making of that disclosure. SeeBeyondBorders will also deal with staff who are the subject of the disclosure fairly and with an open mind.

The Board carries final responsibility for Code of Conduct breaches (including fraud, corruption, conflicts of interest), however the investigation of all breaches will be forwarded to the leadership team (or Country Manager if Australia or the UK) who will then assign a team member to lead the investigation and decision. In some circumstances, depending on the severity of the breach, it may be appropriate to refer directly to the CEO in the first instance who may refer it to the Board or Trustees (in the UK) to handle. Any complaint involving the CEO will be referred to the Leadership Team and directly to Chair of the Australia Board.

Any incident will be fully investigated and as required, referred to the Leadership Team, the Board, or an external authority, for further investigation. Staff and volunteers retain the right to escalate any issue, at any time, to the Board.

In the event that a wrongdoing is identified, it will be swiftly and firmly addressed at the highest appropriate level (possibly the CEO, Board or external party such as the Police as appropriate), to indicate the seriousness with which inappropriate behaviour of any nature is viewed.

8 DESIGNATED BOARD MEMBER

Should a breach of The Code be severe enough to be referred to The Board, this should be to the Chair.

Where appropriate, a member of SeeBeyondBorders Personnel may also refer to the CEO or their manager in the first instance. However, they should not feel in the least precluded from contacting any Board member directly.

9 POLICY MANAGEMENT

This Policy has been approved by the Australian Board and the Trustees of SeeBeyondBorders’ other entities as noted below.

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 before the expiry of three years, and recommendations for changes to the background or policy in practice can be approved by the relevant Sub-Committee.

Doc ref	Doc type	Approved by Australian Board Date	Minute ref.	Approved by UK Trustees Date	Minute ref	Approved by Irish Board Date	Minute ref
	Policy Review	30/6/2015				N/A	N/A
	Policy Review	Board August 2018		11/10/18	Minutes from 11/10/18	N/A	N/A
	Policy Update	Board Nov 2019				N/A	N/A
CoC/11/2019/1.1	Policy Update	ANCP Committee 23 Jul 2020	Minuted Item 4	21 July 2020	Item 5		

Code of Conduct Declaration***Declaration of Understanding and Compliance***

I, _____ (write name), declare that I have read and understood the contents of SeeBeyondBorders Code of Conduct and confirm that I understand my responsibilities to comply.

Signed _____ Date _____

Role/Association _____

Appendix A – Reporting Procedures

Child Protection Concerns

SeeBeyondBorders Personnel should immediately raise and report any concerns for the safety or wellbeing of a child to one of the following people:

- SeeBeyondBorders' Child Protection & Inclusion Officer: Kimlen Tan
- SeeBeyondBorders' Country Manager, Cambodia: Pov Pheung
- SeeBeyondBorders' CEO: Edward Shuttleworth
- SeeBeyondBorders' Safeguarding Focal Point Officer (Australia): Priscilla Chang
- SeeBeyondBorders' Safeguarding Focal Point Officer (UK): Jayne Crow
- SeeBeyondBorders' Safeguarding Focal Point Officer (Ireland): TBC

The incident will then be investigated and escalated in accordance with SeeBeyondBorders' Child and Vulnerable Beneficiaries Protection Policy, which may include reporting to relevant authorities in Australia, the UK or Ireland, and reporting any criminal incidents to the Police.

Sexual Exploitation, Abuse or Harassment Concerns

SeeBeyondBorders 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:

- SeeBeyondBorders' Safeguarding Focal Point Officer: Kimlen Tan
- SeeBeyondBorders' Country Manager, Cambodia: Pov Pheung
- SeeBeyondBorders' CEO: Edward Shuttleworth
- SeeBeyondBorders' Safeguarding Focal Point Officer (Australia): Priscilla Chang
- SeeBeyondBorders' Safeguarding Focal Point Officer (UK): Jayne Crow
- SeeBeyondBorders' Safeguarding Focal Point Officer (Ireland): TBC

The incident will then be investigated and escalated in accordance with SeeBeyondBorders' Anti-Discrimination, Bullying and Harassment Policy. This may include reporting to relevant authorities as set out below:

Australia: we will report SEAH incidents (when they occur in delivery of DfAT business) to DfAT via the specified email address: seah.reports@dfat.gov.au, using the specified SEAH incident reporting form.

UK: we will report SEAH incidents to DfID (when they occur in delivery of DfID business) to DfID via the specified email address: reportingconcerns@dfid.gov.uk

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 our handling or resolution of the complaint, they can complain direct to the relevant regulatory body, as follows:

Australia: send complaints to the ACFID Code of Conduct Committee, via email to: code@acfid.com.au, or in writing by post. Full details are available here: <https://acfid.asn.au/content/complaints>

UK: send complaints to the UK Charity Commission, via the online form available here: <https://forms.charitycommission.gov.uk/raising-concerns/>

POLICY

Ireland: send concerns to the Charities Regulator, via the online form available here:

<https://portal.charitiesregulator.ie/concerns>

Breaches of this Policy and Whistleblowing

Where an individual becomes aware of a breach of this Policy, or any wrongdoing, they should report to a member of the SeeBeyondBorders leadership team immediately. Key leadership team members are:

Country Manager (Cambodia): Pov Pheung

CEO: Edward Shuttleworth

Program Director: Kate Shuttleworth

General Manager (HR and Finance): Derek Culligan

Director of Development: Colm Byrne

Quality Teaching Program Coordinator: Mel Cashen

Australia General Manager: Andy Wade

UK Country Manager: Sarah Reynolds

Chair of Irish Trustees: Edward Shuttleworth