



## AAS - CPC

### ANGLO-AMERICAN SCHOOL of SOFIA – CODE of PROFESSIONAL CONDUCT

*Developed December 2012 - Approved March 2013 – Updated January 2016, August 2016, August 2018*

#### Introduction

Our stakeholders entrust us with children. Integrity, honesty and full compliance with applicable laws have governed the Anglo-American School's practices. AAS faculty and staff have upheld and lived this commitment in their every day responsibilities ever since its founding in 1967. Indeed integrity is of critical importance when working with students and adults alike, and is one of AAS's greatest assets. This Code of Professional Conduct specifies and helps the continued implementation of our mission, by establishing certain non-negotiable minimum standards of behaviour in key areas. The nature of this Code is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference against which to measure any activities. Faculty and staff should seek guidance when they are in doubt about the proper course of action in a given situation, as it is the ultimate responsibility of each employee to "do the right thing", a responsibility that cannot be delegated. It provides a framework when considering the adage "character is not what you do when someone is looking; it is what you do when no one is looking."

\* In addition to the above, the Code of Professional Conduct is to support an environment that is commensurate with the United Nations Declaration of Human Rights,

- [United Nations Declaration of Human Rights - English](#)
- [United Nations Declaration of Human Rights - Bulgarian](#)

\*This policy applies to the whole school including Pre-School to Grade 12, AAS Staff, the AAS School Board and third party instructors.

\*This policy works in accordance with all school policies, procedures and handbooks, in particular the AAS Child Protection Policy, as well as our mission, core values and global citizenship statement.

\*For the purposes of this Code references to "staff" include, employees, staff, faculty, volunteers, invited instructors or consultants, coaches, activity sponsors, contracted employees, including third party contractors.

#### Laws, Rules and Regulations

##### We respect the law

The law binds AAS and its staff. Compliance with all applicable laws and regulations must never be compromised. Additionally, employees shall adhere to internal rules and regulations as they apply in a given situation. Those internal rules are specific to AAS and may go beyond what is required by the law.

## **Conflicts of Interest**

### **□ We act in the best interest of AAS**

A conflict of interest occurs when personal interests of a member or members of staff or the interests of a third party compete with the interests of AAS. In such a situation, it can be difficult for the staff member to act fully in the best interests of AAS. AAS staff shall avoid conflicts of interest whenever possible. If a conflict of interest situation has occurred or if a staff member faces a situation that may involve or lead to a conflict of interest, the staff member shall disclose it to his or her direct supervisor and/or HR. In turn, the situation will be handled in a fair and transparent manner.

## **Families and Relatives**

### **□ Our hiring, professional development opportunities and admissions decisions will be fair and objective**

Immediate family members and partners of staff may be hired as employees or consultants only if the appointment is based on qualifications, performance, skills and experience and provided that there is no direct reporting or hiring relationship between the staff member and his or her relative or partner. These principles of fair employment will apply to all aspects of the employment, including compensation, promotions, as well as in case that the relationship develops after the respective employee has joined the AAS. Provided that they are equally suited as other candidates, priority may be given to children of AAS staff with respect to internships, volunteer opportunities and employment during holidays and similar short-term assignments. The Director must approve such a scenario, and in turn the Director must inform the Board Chair in relation to the above.

## **Data Protection, GDPR and Confidential Information**

### **□ We value and protect our confidential information and we respect the confidential information of others**

Confidential information consists of any information that is not or not yet public information. It includes student information, programs in development, school records, employment information, individual salary and benefits, personal files and non-published data. Unless required by law or authorized by their management, staff shall not disclose confidential information or allow such disclosure. Staff are to be mindful and compliant with respect to the GDPR (General Data Protection Regulation). Furthermore, staff must use best efforts to avoid unintentional disclosure by applying special care when storing or transmitting confidential information.

## **Fraud, Protection of AAS Property, Accounting**

### **□ We insist on honesty and we respect AAS' assets and property**

Staff must never engage in fraudulent or any other dishonest conduct involving the property or assets or the financial reporting and accounting of AAS or any third party. This may not only entail disciplinary sanctions but also result in criminal charges. AAS' financial records are the basis for managing the school and fulfilling its obligations to various stakeholders. Therefore, any financial record must be accurate and in line with AAS' accounting standards. Staff shall safeguard and make only proper and efficient use of AAS property. All staff shall seek to protect AAS' property from loss, damage, misuse, theft, fraud, embezzlement and destruction. These obligations cover both tangible and intangible assets, including, know-how, confidential or proprietary information and information systems. Ownership of school documents including, procedural documents and policy documents rests with the school. In the case of curricular documents the ownership is shared, as such these documents stay with the school and may also be transferred with departing staff following school approval. To the extent permitted under applicable law, AAS reserves the right to monitor and inspect how its assets and property and materials are used by

staff members, may include but are not limited to inspection of all e-mail, data, files kept on AAS network terminals and social media.

### **Safe Environment – Child Protection**

#### **□ We will do our utmost to keep our students safe**

Ensuring AAS is a safe place for child is critical. As individuals, groups, and organization and a community we are to do our utmost to keep our students safe. Information in our family handbook and child protection policy, help guide us in safeguarding our students – and must be followed. Prudent and safe recruiting practices must be followed.

### **Safe Environment – Free of Harassment and Discrimination**

#### **□ We embrace diversity and respect the personal dignity of our community members**

AAS respects the personal dignity, privacy and personal rights of every staff and AAS community member and is committed to maintaining an educational environment free from discrimination and harassment. Therefore, employees must not discriminate on the basis of origin, nationality, religion, race, gender, age or sexual orientation, or engage in any kind of verbal or physical harassment based on any of the above or any other reason. Staff members who feel that our educational environment does not comply with the above principles are encouraged to raise their concerns with their direct supervisor or HR.

### **Corruption**

#### **□ We are uncorrupt**

Staff must never, directly or through intermediaries, offer or promise any personal or improper financial or other advantage in order to obtain or retain a business or other advantage from a third party, whether public or private. Nor must they accept any such advantage in return for any preferential treatment of a third party. Moreover, staff must refrain from any activity or behaviour that could give rise to the appearance or suspicion of such conduct or the attempt thereof. Staff members should be aware that the offering or giving of improper benefits in order to influence the decision of the recipient, even if he or she is not a government official, might not only entail disciplinary sanctions but also result in criminal charges. Improper benefits may consist of anything of value for the recipient, including employment or consultancy contracts for closely related parties.

### **Gifts and Favours**

**□ Our partnerships and business relationships are based on quality and supporting people** Receiving favours shall not influence staff members nor shall they try to improperly influence others by providing favours. Staff members may only offer or accept reasonable and/or symbolic gifts which are appropriate under the circumstances, and they shall not accept or offer gifts if such behaviour could create the impression of improperly influencing the respective educational partnership or business relationship. Educational staff must report to their direct supervisor any gift received that is valued more than 100 Euros. Board members, members of the school leadership team and business office staff may not receive gifts from any third party on the basis of his or her position with AAS (other than occasional gifts valued at no more than 100 Euros or if valued at more than 100 Euros the gift is made available in a team space or common area for others to share - e.g., fruit baskets, boxes of candy, flowers). All other gifts should be returned to the donor with the explanation that AAS policy does not permit the acceptance of gifts. No personal gift of money should ever be accepted.

## **Cooperation and Compliance with the Code of Professional Conduct**

### **□ We will consult the Code, comply with its provisions and seek guidance where needed**

It is each staff member's responsibility to ensure cooperation and compliance with the provisions of this Code of Professional Conduct and to seek guidance where necessary from their direct supervisor, or from the HR. To "do the right thing" and to ensure the highest standards of integrity is each staff member's personal responsibility that cannot be delegated. When in doubt, employees should always be guided by the basic principles stated in the introduction to this Code.

## **Reporting Uncooperative and Non-Compliant Conduct**

### **□ We take responsibility for ensuring that we all act with integrity in all situations**

Staff members shall report any practices or actions believed to be inappropriate under the Code of Professional Conduct. If it is appropriate, in view of the nature of the reported matter, reports of violations may be made directly to higher levels including the Director. For greater detail please refer to the Speaking Up Policy.

## **Mission Driven**

- Our Code of Professional Conduct helps us live our mission and our core values and be global citizens.** Our Mission - We engage, support and prepare each student for today and tomorrow. Our Core Values are Commitment, Respect and Excellence. At AAS, we recognize global citizenship transcends school approach, beliefs and actions.

**Certification and Signing – 2020-2021 School Year**

*Any failure to comply with this Code of Professional Conduct may result in disciplinary action, including the possibility of suspension, dismissal and, if warranted, legal action. The Code of Professional Conduct and its application shall be reviewed, read and signed annually for the information and guidance of AAS Board members and AAS staff members, each of whom has a continuing responsibility to scrutinize their transactions and outside business interests and relationships for potential conflicts of interest, and make such disclosures as described in this policy. I have read and agree to abide by AAS' Code of Professional Conduct. To the best of my knowledge, I have no conflicts as described in this Policy.*

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*Name*

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*Title or Affiliation with AAS*

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*Signature*

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*Date*