



THE AAS MISSION
We engage, support and prepare each student for today and tomorrow.



OUR CORE VALUES
Commitment, Respect, Excellence

ANGLOAMERICAN SCHOOL OF SOFIA SPEAKING UP POLICY

*Developed October 2012, Approved March 2013, Updated August 2021,
January 2023*

Introduction

The Anglo-American School of Sofia is committed to conducting its activities in accordance with the highest ethical and legal standards. With this in mind, this document provides a procedure for raising concerns about malpractice or wrongdoing in the workplace. This policy applies to all staff and it is intended to reassure staff that they can raise concerns without fear of victimization, subsequent discrimination or disadvantage. The Speaking Up policy supports The Code of Professional Conduct and should be referred to in instances in which acts of unlawful, unethical or improper behaviour are observed.

* In addition to the above, the Speaking Up Policy is to support an environment that is commensurate with the United Nations Declaration of Human Rights and the United Nations Convention on the Rights of the Child:

- [United Nations Declaration of Human Rights - English](#)
- [United Nations Declaration of Human Rights - Bulgarian](#)
- [United Nations Convention on the Rights of the Child](#)

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

*This policy works in accordance with all school policies, procedures and handbooks, in particular the AAS Code of Professional Conduct and AAS Child Protection Policy.

*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.

Purpose

The Speaking Up Policy will enable the Anglo-American School of Sofia to take appropriate actions to:

- Support the school’s Mission,
- Support ethical behaviour,
- Prevent or report criminal activity,
- Pre-empt unlawful acts or other wrongdoings,
- Create an environment in which staff are able to communicate concerns,
- Address information management, privacy, confidentiality, health and safety, and environmental issues to prevent injury or damage occurring

Scope

The act applies to people who disclose information, which they reasonably believe, provides evidence for:

- Incompliance with the Code of Professional Conduct in relation to due diligence in service to children
- Criminal offenses
- Incompliance with a legal obligation
- Prevention or miscarriage of justice
- Endangerment or likely endangerment of health and safety
- Damage, or likely damage to the school environment

The policy provides a safe alternative to silence and enables concerns to be dealt with effectively and efficiently, whilst deterring and discouraging people from abusing their position or authority. It can act as an early warning system to alert the organisation before it is too late, providing information so that issues can be addressed before incidents go too far.

The policy also enables individuals to raise concerns confidentially. Although most concerns will be dealt with locally within the office or department, there may be occasions when staff may need to take their concerns to designated people outside the line of administrative structure. However, individuals are encouraged to raise concerns internally through the procedure set out in the policy, rather than ignoring a problem or contacting external contacts.

Any concerns raised in good faith will be treated seriously and will be investigated as set out in this policy.

The Anglo-American School of Sofia will not tolerate harassment or victimization of any member of staff for raising a genuine concern in good faith under this policy. Disciplinary action will be taken against the perpetrator in the event of such harassment or victimization-taking place. Equally, disciplinary action may be taken against a member of staff raising a concern maliciously or falsely.

Confidentiality

The Anglo-American School of Sofia recognizes that in some cases staff may choose to raise a concern in confidence, therefore this policy includes the option of having confidential meetings. However, there may be matters that cannot be dealt with internally, thus, external authorities will need to become involved. Should that become necessary, Anglo American School of Sofia reserves the right to make such a referral without the member of staff's consent. The Anglo-American School of Sofia will inform the member of staff if an external referral is made.

Members of staff may also choose to raise concerns anonymously. This will be taken in good faith. However, staff must be aware that this may lead to difficulties in conducting an effective investigation into the concern and will mean that the anonymous staff will not be advised of the outcome of any investigation.

Raising a Concern

If you believe you have evidence of wrongdoing referred to in the Scope of this document, you should follow the procedure outlined below.

There is no set timescale for raising or addressing a concern, but to ensure they are addressed swiftly it is preferably for you to do this as soon as possible.

You must not do any of the following:

- Discuss the case facts, concerns or allegations with anyone outside the Anglo-American School of Sofia, unless specifically asked to do so by a member of the administrative team,
- Discuss the case with anyone in the Anglo-American School of Sofia other than those listed below,
- Attempt personally to conduct an investigation, interview or question anyone unless asked to do so by the Anglo-American School of Sofia administration.

First Stage

If you have a concern, raise it first with the First Stage Contacts (listed below). This may be done orally or in writing.

If you feel unable to raise the matter with the administrator, for whatever reason, please contact one of the External Contacts listed below.

When a concern has been raised the First Stage Contact may provide, but is not limited to providing the following:

- Acknowledgement that the report of concern has been received,
- Indication how the Anglo-American School proposes to deal with the matter,
- An estimate of how long it will take to provide a final response,

- Advise if any initial enquiries have been made,
- Advise whether further investigations will take place and if not, why not.

Other actions that occur during the first stage may include, but are not limited to:

- Obtaining consent to release your identity to specified staff on a need-to-know basis,
- Checking that the action that led to the allegation has ceased,
- Checking that there is no victimization resulting from the allegation,
- Ensuring that there is no further similar action or victimization elsewhere in the department or country as a result of the outcome of the investigation.

First Stage Contacts

Direct Supervisor

Finance Manager

ES Principal

MS/HS Principal

Director

Second Stage

If the matter is in the public interest and having followed the First Stage process you continue to have concerns, then you may contact a party listed the External Contact section of this document (see list below). You must outline your concerns in writing to the External Contact as soon as possible.

The External Contact may, as appropriate, commission further investigation of the concerns reported or make a decision based on the evidence presented in the First Stage.

The External Contact may communicate the outcome of the decision and/or further investigation to you, outlining the conclusion and the action to be taken, as soon as possible.

This is the final step in the internal procedure for investigating concerns of malpractice or wrongdoing.

Investigation Guidelines

- The investigation must involve an independent internal or external investigator.
- If the Anglo-American School of Sofia is obliged to report the matter externally, the First or Second Stage Contact must ensure that independent and objective evidence is provided to the relevant authorities.
- The First and/or Second Stage Contact must keep the member of staff informed of the nature of the external investigation, and inform them if the Anglo-American School of Sofia intends to disclose their identity to an external authority.
- If the investigation or concern raised involves external third parties, administration may provide guidance, including a review of reports and management letters.
- The Administration must also consider the rights of reply of any parties involved in the investigation in the event of potential action against them.

Second Stage Contact

Director

Board Member

Related Information and Documents

Child Protection Policy

Code of Professional Conduct

Family Handbook

Faculty and Staff Handbook

Board Policy

Mission Driven

Our Child Protection Policy helps us live our mission and our core values and be global citizens: *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.*