



## OUR CODE OF CONDUCT

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**PRINCIPLE OBLIGATIONS  
OF STAFF IN THE OFFICE**

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**RELATIONSHIP WITH  
OUTSIDE BODIES**

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# FOREWORD



Dear Colleagues,

At EUN we take pride in our achievements in bringing innovation in teaching and learning to our key stakeholders: Ministries of Education, schools, teachers, researchers and industry partners. However, it is not just about the results. We place equal importance on the way we behave and the way we do business.

Ethical behavior or having a sense of integrity matters to us as it is key to developing and engendering trust in what we do and in our services and is the foundation stone for the long term sustainability of our work. Poor ethical behavior damages our reputation and risks our credibility with our key stakeholders and the people we serve. This is the reason we have developed this Code of Conduct which applies to all EUN staff including employees, secondees, in-house consultants and trainees.

We have designed this Code of Conduct not as a list of instructions or a set of rules which you have to obey under threat of sanction but as a guidance and support to help you understand the Core Values of EUN and how these should be applied in our everyday work.

The Code is inspired by and takes account of the various suggestions and proposals which came out of the consultations and group work with staff in the Office which took place when we were developing our Core Values. In this respect, the Code very much belongs to us all.

Yours sincerely,



**Marc Durando**

*Executive Director*

15<sup>th</sup> January 2019

# INTRODUCTION

This Code details the behaviour we expect of each other in carrying-out our tasks and applies equally to managers, employees, trainees, secondees and in-house consultants (collectively referred to as “our staff” or “staff” in this document). The Code is also intended to provide a link with our key procedures and processes relating to good governance and management. These cover issues such as conflicts of interest, procurement, recruitment and personnel issues and relationships with sponsors.

The Code covers how we should use ethical principles in carrying out our work for EUN. Ethical issues are very rarely black and white but are very often shades of grey. For this reason the Code is not intended to provide you with an answer to every question you may have or every situation you may be faced with; instead it provides a set of guiding principles to follow when faced with an ethical dilemma. These principles should act as a signpost to help you do the right thing.

The Code is divided into three sections. The first section deals with how we apply our Values to our relationships with our colleagues in the office, i.e. what is expected of us as a staff member or manager. The second section deals with our relationship with people and organisations outside of the office, for example, stakeholders, suppliers, the European Commission, sponsors. The third section details where staff members can get further information or support with respect to any of the matters raised in the Code.

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# KEY ELEMENTS OF THE CODE

## 1. PRINCIPLE OBLIGATIONS OF STAFF IN THE OFFICE

*This section sets-out the conduct which is expected of us as an EUN staff member whether that is as a manager, employee, trainee, secondee or in-house consultant. This covers 6 key obligations or duties: the duty to act with impartiality and objectivity, the duty of loyalty, the duty to be open minded, the obligation to support colleagues and share knowledge, the duty to assist the work of our network of Ministries of Education and the duty to act responsibly. These 6 duties are considered in more detail below.*

### 1.1. The Duty to act with Impartiality and Objectivity

Our credibility is very important both for our work and for our reputation and therefore we will make all efforts to be impartial and objective in our work. We will base our decisions and results on the available evidence and a sound methodological approach. We will strive to avoid any appearance of bias and ensure that in our actions, behaviour and business decisions, our independence cannot be called into question. If any situation arises where a member of staff feels that he/she may have a conflict of interest<sup>1</sup> with respect to any matter for which he/she is responsible, he/she will report it immediately to their hierarchy in accordance with EUN's Conflict of Interest Policy.

1. This could be defined as any situation in which ones personal interests conflict with the interests of the organisation.

### 1.2. The Duty of Loyalty

We will do our best to promote our values and the interests of the organisation and no matter what our position or role in the Office, we shall strive to be an ambassador for EUN. We realise that we all have a positive role to play in promoting the role and image of the organisation and in avoiding unjustified criticism of EUN especially to the outside world, our clients and stakeholders.

### 1.3. The Duty to be Open Minded and to Challenge – We Embrace Change

Our values state that we will embrace change and new ideas and that we are ready to look at the world with a new pair of eyes. This means that we will try to be open minded and listen to needs of other people, especially

staff in the office. We encourage people to challenge established positions and to speak up and will not criticise anyone for doing this provided that they act in good faith.

### 1.4. The Duty to Support Each Other and Share Our Knowledge

As an organisation and as stated in our values, we believe in working together for the common good. We will therefore do our best to share our knowledge and best practice with other teams in the Office and will actively look for opportunities to communicate and share such information, whether this be on an informal or formal basis. We recognise that having a “silo mentality” towards knowledge and good practice is not conducive to the development of the organisation.

## 1.5. The Duty to Support the Work of Our Network of Ministries of Education

We are an independent network of Ministries of Education and we work together to serve the interests of the wider school community in Europe. EUN is managed by a Steering Committee and a Board of Directors made up of members of the network. Both of these bodies have endorsed the underlying values and principles of this Code of Conduct and support its implementation in the Office.

However, Ministries are much more than just our partners in projects and our behaviour and attitude towards them has to reflect this. Within the context of the Code, we must follow the strategy and path set by these bodies. In particular, we will always respond to requests and enquiries from our members in a professional and diligent manner and without undue delay.

## 1.6. The Duty to Act Responsibly

We will act responsibly and will do our best to do the right thing and work for the long term good of EUN. This means, in particular:



We will always act in accordance with the law and not knowingly do anything that is illegal, immoral or breaches anti-bribery or anti-corruption laws.



In every professional situation, we will try to see what is the correct and ethical course of action and pursue that. Where necessary, we will seek advice and guidance from the persons listed in section 3 before taking action.



We will follow the procedures and processes established by the Office for its proper management and governance, including this Code of Conduct.



We will respect EUN's confidential information and trade secrets and will not disclose personal data held by the Office in such a manner as to amount to a breach of data protection law (GDPR).



We will try and support our colleagues and the management of EUN and not place them in a difficult position by not acting professionally or without due consideration of their obligations or time constraints.



We will act with integrity and shall take responsibility for our individual actions and decisions. At the same time, we recognise that we all have a duty to act in a collegiate manner and to make suggestions to try and improve the working conditions in the Office.



We will treat each other fairly, politely and courteously and will respect each other's differences and experience. We will not discriminate against any person and will not engage in any activity that might amount to sexual or psychological harassment or bullying under the applicable legislation.



We wish to underline that the duty to act reasonably applies to all members of staff whether managers, employees, trainees, secondees or in-house consultants. Every member of staff has the right to be treated fairly, objectively, impartially and with dignity and respect.

## 2. RELATIONSHIP WITH OUTSIDE BODIES

Our work at EUN involves us in interaction with a wide variety of stakeholders, customers or clients, suppliers, sponsors, funders (including the European Commission) and industry. In this section, we consider what should be our conduct towards these “outside” bodies.

The general principles described in section 1 above, will also apply to our relationship with the outside bodies with whom we collaborate, for example the duty to act with objectivity and impartiality or the duty to act responsibly. However, we would like to underline the following specific points with respect to the people and organisations with which we do business:

- Our reputation and good name matters. We will treat all people and the organisations with whom we do business, ethically and correctly. This means that they should be treated with respect, politeness and courtesy by all members of staff no matter what their position;

- As far as possible and practical, we will do business with organisations that share our common values and approach;
- We will make every effort to ensure that we fulfil all our obligations on time under our contracts with our customers and clients. This is especially the case when it is a case of a grant or service contract with European Commission or other funders;
- EUN suppliers should be appointed in accordance with our procurement procedures. Consequently, the decision to appoint a supplier has to be based on the principles of objectivity, impartiality, equal treatment and transparency;
- Every EUN supplier has the right to be treated fairly and equitably and to receive a contract or equivalent legal document before the work

starts. Provided the work is performed on time and is satisfactory, suppliers should be paid in accordance with the terms of the contract (i.e. not late);

- EUN staff should not accept gifts or hospitality from suppliers or customers unless this is in accordance with the EUN Policy on conflicts of Interest. Accepting a gift may give the impression that the relevant member of staff may be biased or favour that supplier;
- Our work with industry and commercial companies is governed by our document, entitled “Working with Sponsors.” The terms under which we work with a commercial company should not give the impression that we are endorsing a particular product or service of that company.

### 3. SPEAK UP PROCEDURES

The management of EUN very much supports a Speak Up culture in the Office and encourages all members of staff to come forward to voice concerns, point out problems or just to suggest ideas for the improvement of processes. Your first point of contact for voicing these concerns should be your line manager.

We would also like to underline that we do have a responsibility to speak up if we see something happening in the office which might be unethical, potentially harmful or which could damage the reputation of EUN. Raising a serious concern in good faith will not get you into trouble and will be treated confidentially by the persons to whom you report (see below). Such matters should be reported as soon as possible.

If you have an ethical concern or question or would simply like to get further information on the Code and how it might apply to you, please contact any of the following persons:

- The Internal Auditor
- The Human Resources Function
- Your Team Leader

This Code was approved by the Management Team on the **16<sup>th</sup> January 2019** and comes into effect on the **31<sup>st</sup> January 2019**.

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