



## AHK Integrity Code

The Amsterdam University of the Arts (AHK) would like to encourage staff members to act properly and carefully when performing their job with regard to students, colleagues and the AHK as an organisation.

The School therefore sets requirements for its staff members with respect to the observance of shared values and norms in behaviour, treating each other and the School's resources in a responsible way, and on how to deal with temptations. These requirements form the basis of the School's integrity policy, as formulated in the integrity code.

The integrity code relates to the following areas, where violation of integrity can occur:

- a. corruption;
- b. fraud;
- c. theft and waste;
- d. conflict of interests and incompatibility of positions;
- e. abuse of information;
- f. misconduct, undesirable forms of behaviour, and use of alcohol and drugs.

All employees of the AHK must abide by the integrity code.

### a. Corruption

Staff members of the AHK must avoid a personal financial interest affecting their professional functioning. They are, in the first instance, responsible themselves for making a correct assessment. In case of doubt, they should consult their manager.

Examples:

- Gifts received by virtue of their position; if these gifts are substantial in size, this must be reported to the manager;
- Gifts and presents of a substantial value (more than 25 euros) given by a person or organisation with which the member of staff has a functional relationship are not kept by the recipient for private purposes, but are made available to the AHK community;
- A gift for which the giver demands something in return should not be accepted;
- Invitations are never accepted in exchange for a favour in return;
- Members of staff do not accept gains in private transactions (for example, discounts on purchases) from companies or organisations with which they have a business relationship by virtue of their AHK position.

### b. Fraud

Staff members of the AHK should deal with data and information in a correct and honest way, and with respect for the intellectual property/copyright.

- There should be no tampering with information (altering, falsifying, omitting, adding, removing) in documents and digital resources;
- There should be no improper use of financial resources;
- The current rules are observed when using sources;
- No personal profit is derived from knowledge or material developed by others, such as teaching material, publications or artistic concepts.

### c. Theft and waste



Staff member of the AHK should treat the AHK resources with care, including both the material resources (equipment, rooms) and the non-material resources (time).

- Private use of facilities such as email, internet, fax, (mobile) telephones, printers and photocopiers should be limited and not have a negative influence on the work of the staff member him or herself and/or others.
- No consumer goods should be taken away for private use;
- AHK materials or equipment may not be used for private purposes, either during or outside working hours;
- Only genuinely incurred expenses should be declared, which are made by virtue of the position and with the approval of the manager, and which are not refunded in any other way; expenses declared can be checked at any time;
- The same rules and conditions apply to the use of credit cards as to declarations;
- Members of staff should not appropriate money or items under their control, nor should they hold on to money or goods (temporarily or permanently);
- The buildings and other premises of the AHK should not be used for private purposes;
- The working hours at the AHK are not used for other activities than those that correspond to the position, unless a different agreement has been made with the manager;
- Staff members must not be wasteful in the form of negligent, inattentive or indifferent use of material, time and funds of the School nor, whether deliberately or not, function less effectively and less efficiently than can be reasonably expected.

#### d. Conflict of interests and incompatibility of positions

Staff members of the AHK should keep the interests of the AHK separate from their private interests at all times; staff members should exclusively serve the interests of the School in carrying out their job.

- Staff members should inform their manager of personal or business relationships with third parties that might lead to (the appearance of) a conflict of interests;
- Staff members should not enter into contracts (employment contracts, deliveries) with people with whom they have a private relationship or organisations with which they have a business interest; if there are, nevertheless, strong reasons for doing so, recommendations or tenders should always be presented to the manager;
- Ancillary activities that might lead to a conflict of interests should be discussed with the manager;
- Careful and transparent procedures are expected when employing of new staff or when giving assignments (and calling for tenders);
- Staff members should not perform any external positions (paid or unpaid) that are in conflict with the interests of the AHK;
- Staff members should not combine any positions within the AHK that are mutually incompatible.

#### e. Abuse of information

Staff members of the AHK should deal in a careful and correct way with sensitive private information concerning students, colleagues and the AHK as an organisation. This entails:

- Confidentiality with regard to confidential information obtained in the position;
- Not making use of information obtained by virtue of the position for personal gain or personal relationships.
- Behaviour in accordance with the ICT code of conduct (Regulations on the use of ICT facilities at the AHK) and privacy regulations;

These obligations still apply after termination of employment.



f. Misconduct, undesirable forms of behaviour, and use of alcohol and drugs

Members of staff should treat students, colleagues and external relations of the AHK with respect. Staff members should not be guilty, within or outside the workplace, of (serious) misconduct, which could damage the good name or credibility of the School;

- Staff members should not be guilty of discrimination, sexual harassment, bullying, insult, aggression or violence;
- Staff members should not use alcohol or drugs in standard workplaces, nor should they be under the influence of alcohol or drugs;
- Staff members can, however, drink alcohol during work-related situations in which serving alcohol is normal (receptions, business or collegiate lunches/dinners, evening programme of work conferences spread over a number of days or excursions, drinks parties and suchlike), provided this is done in moderation and responsibly, and in accordance with normal boundaries and forms of behaviour.
- Staff members who use alcohol or drugs in situations outside work, should ensure that this use has no adverse effects on their work, social contacts at work, or the interests or the image of the AHK.

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*These regulations were adopted by the Supervisory Board on 15 December 2009.  
Article f was amended on 22 February 2012 by decision of the Executive Board.*



## Explanation *AHK Integrity Code*

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### 1. Introduction

The Amsterdam University of the Arts (AHK) would like to encourage staff members to act properly and carefully when performing their job with regard to students, colleagues and the AHK as an organisation. The objectives of the school are formulated in the mission. In order to achieve these objectives, the organisation sets requirements for its staff members with respect to the observance of shared values and norms in behaviour, treating each other and the School's resources in a responsible way, and on how to deal with temptations. These requirements form the basis of the School's integrity policy, as formulated in the integrity code. Certain parts are or will be covered by separate regulations (see section 4)

The AHK has drawn up an integrity code in order to be a dependable organisation for its staff members, students and other relations. Compliance with the code enhances the quality of the institution and reduces risks.

The integrity policy is more than just the text of the integrity code. It concerns awareness of integrity, the display of exemplary behaviour, the drawing up of rules and procedures, adjusting behaviour, the implementation of complaints procedures, and the monitoring and reporting of experiences in practice.

### 2. Adoption and publication

This code applies to all staff members of the AHK, including all teachers, guest lecturers, educational support staff, other support staff, members of the management and executive staff.

This code also applies to students in cases where they make use of the resources of the School or act on behalf of the School. However, only the term 'staff members' is used for reasons of clarity.

Every member of staff is expected to avoid behaviour that violates his or her integrity and the integrity of the school. This means that every staff member must make an assessment of his or her and other people's vulnerabilities, and must avoid risks to integrity.

*Motto: In case of doubt: avoid action or consult first.*

The integrity code has been discussed by the Executive Board, and with the Faculty Boards and the School Board.

The code was adopted by the Supervisory Board.

The code is made public via the AHK intranet and is presented to all staff members when entering into employment with the AHK.

### 3. The concept of integrity

Many organisations see an integrity code not only as a way of preventing undesirable behaviour, but also as a way of specifying and promoting desirable behaviour.

This is expressed in guidelines for general forms of behaviour (etiquette, decency, honesty, and respect), professionalism (objectivity in judgement, equality in the treatment of people, authenticity) or social commitment (sustainability, emancipation).



On the other hand, it is a question of setting boundaries. What behaviour is unacceptable and which norms apply to this? This concerns behaviour that is absolutely unacceptable in any form (fraud) and behaviour for which certain limits are set (for example the boundary between business gifts and corruption).

Given the organisational structure and culture of the AHK with its different faculties and sub-identities, the definition of desirable behaviour is a matter for each member of staff and consultation between colleagues in the different faculties. The bottom line that indicates which behaviour is unacceptable is, however, a matter that is laid down throughout the School in this integrity code.

In connection with the specific character of arts education, some topics have been included that do not feature in conventional codes of conduct. These concern artistic integrity and the long-term protection of privacy, given the fact that students may run extra privacy risks if they later enjoy wider recognition as artists.

#### **4. Regulations**

This code relates to the following areas of violation of integrity that (may) occur:

- a. corruption;
- b. fraud;
- c. theft and waste;
- d. conflict of interests and incompatibility of positions;
- e. abuse of information;
- f. undesirable forms of behaviour and misconduct.

The following procedures also form a part of the integrity policy:

- Management regulations;
- Student Charter
- Internal regulations on sensitive personal information;
- Complaints procedure for sexual harassment and aggression;
- Students with a functional impairment;
- Regulations on the use of ICT Facilities;
- Whistle-blower regulations;
- General complaints procedure (part of the Student Charter);
- AHK contracts on business facilities;
- Other applicable administrative regulations and procedures.

The integrity code indicates which values apply, for example the verifiability of declarations or the incompatibility of positions.

The related norms will be specified in more detailed regulations where necessary, for example in the form of prescriptions for the maximum sums that can be declared or business gifts, or specifically stating which positions are mutually incompatible.

#### **5. Awareness of risk and prevention**

Managers and staff members must be aware of the risks to integrity in the School. They must be alert to processes and functions where the temptations (or the tendency to unthinking undesirable behaviour) are great.

An increased risk may be present in various situations, including the following: solo positions (somebody who is the only one informed about an activity/project); absence of functional role separation (allocation of resources and financial monitoring in the same hands); contacts with major interested parties (putting out to tender, project developers), especially if other norms and values are applicable in those organisations; the existence of a feeling of lack of appreciation/neglect.



The risks to integrity are explicitly raised by the member of the executive staff in performance reviews with staff members in positions or work situations with a higher level of temptation.

## **6. Supervision, monitoring, whistleblowing, reporting and dealing with violations of integrity**

All managers of the School are entrusted with the supervision and monitoring of compliance with this integrity code.

If a member of staff considers or suspects that another member of staff is not acting with integrity or intends to act in conflict with this code or other internal regulations to promote integrity (see above), he or she should first address the colleague personally. If this is not possible or does not lead to a solution, the staff member should report the situation to the manager of the staff member under suspicion. He or she will treat this reporting confidentially. If reporting the case to that manager does not lead to a solution, the staff member should report the situation to his or her manager.

The manager assesses his or her own findings or the report of the staff member in the light of the integrity code and goes on to decide what to do about the finding or report and which measures to adopt in the specific case and to avoid repetition in the future.

Before adopting these measures, the manager consults with the board, other responsible persons (such as the head of F & A or the head of P & O) and the central complaints and integrity department (see section 7).

If a staff member has reported the situation, feedback will be given to that person after the measures have been taken.

If the violation detected or suspected concerns the superior of a staff member or an official in a higher position, the report can be made directly to the central point for complaints and integrity.

All reports will be treated confidentially. Whistle-blowers are protected by the whistle-blower regulations.

A report is always given serious consideration by the manager and/or the central point and further investigated before proceeding to taking measures. The investigation concerns whether the report is justified, the evidence, and interviews with the suspected staff member and the whistle-blower.

The measures to be adopted must be in reasonable proportion to the violation committed and considered in the light of other regulations (Collective Labour Agreement, Higher Education and Research Act, etc.).

## **7. Central complaints and integrity department**

The School has created a central point for the registration and handling of complaints, appeal procedures and conflicts of all kinds. The structure of this central point is set out in the management regulations. This is legally required by the Higher Education and Research Act since 1 September 2010, or at least as a facility for students in the field of complaints and objection or appeal procedures. This point of contact is not only for the benefit of students, but also focused on complaints regarding staff and integrity.

The tasks of the central point for complaints and integrity are as follows:

- Advising on the handling of reports of violation of integrity;
- Harmonising (the nature and severity of) the measures to be adopted;
- Advising to prevent future violations of integrity;
- Registering and reporting (reports of) violations of integrity and their handling;
- Signalling risks and trends;



- Building up knowledge and advising on risk control and organisational culture in the field of integrity.

## **8. Reporting and evaluation**

The central point for complaints and integrity maintains a register of all reports and of their handling. A report is made every year (that cannot be traced back to individuals) for discussion by the faculty boards, Executive Board, School Board and Supervisory Board. These discussions may lead to a tightening up of the integrity code.