

Code of Conduct

Consent by GMR (Joint Participation Council)	26 September 2025
Adoption by CvB (Executive Board)	29 September 2025
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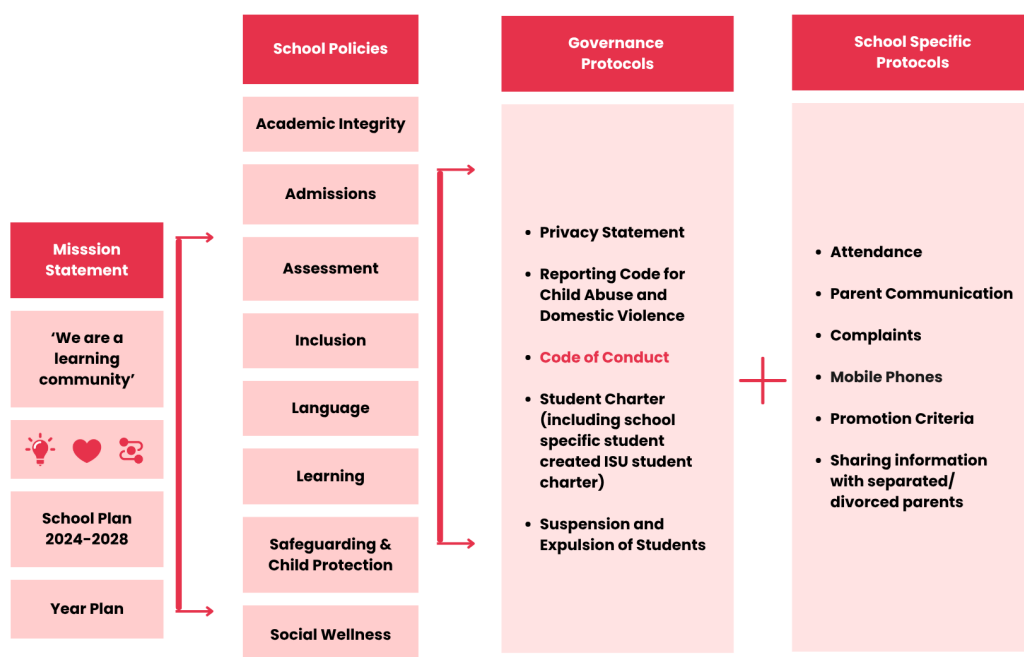


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Gedragcode

At ISU we adhere to the NUOVO *Gedragcode* (Code of Conduct). This Code of Conduct is an unofficial translation of the NUOVO *Gedragcode*. In case of a dispute, the original *Gedragcode* is leading.

1. Introduction

Working in education is a significant responsibility. We¹ contribute to the development of young people towards adulthood and prepare them to take their place in society.

School plays an important role in our students' development. They learn not only from and with their peers but also from and with their teachers and other staff members² connected to the school. The behaviour we, as staff members, exhibit towards students and each other is a critical – and sometimes underestimated – factor in this process.

Within NUOVO, we have embraced the core value of 'morality.' This Code of Conduct is derived from and should be interpreted in light of this core value.

The Code of Conduct aims to provide a clear picture of the professional behaviour we expect from each other. While the code does not describe every possible scenario, it emphasises that all staff behaviour should be grounded in a professional attitude and geared towards supporting our students' development. Any behaviour deemed unprofessional or detrimental to student development is unacceptable. Colleagues may also expect professional attitudes and behaviour from each other.

This Code of Conduct is part of a broader framework that includes other documents, laws, and regulations outlining our working methods, mutual expectations, and responses to breaches of agreements³. It represents the fundamental standards of behaviour we uphold. The Code of Conduct applies to all situations involving NUOVO staff and students.

In cases of interpretative differences, the Executive Board will review the situation, assess it against the Code of Conduct, and determine the appropriate interpretation and course of action.

¹ This Code of Conduct is deliberately written in the 'we' form, representing all employees of NUOVO. Every employee is accountable for exhibiting the expected professional behaviour in our interactions with students and colleagues. We rely on each other to maintain and uphold these standards.

² In this context, 'employees' includes all individuals contributing to NUOVO, such as members of the Supervisory Board, the Executive Board, the leadership team, teachers, educational support staff, interns, teacher trainees, temporary workers, volunteers, external professionals, and associates. This code also explicitly applies to all persons and entities working on behalf of NUOVO Schools.

³ This encompasses various documents such as the NUOVO Veiligheidskader, Code goed onderwijsbestuur VO, Code Goed toezicht, de CAO en andere relevante wet- en regelgeving, NUOVO Statuten en Bestuursreglement, strategisch beleidskader, schoolplan, leerlingenstatuut, klokkenluidersregeling, klachtenregeling, privacyreglement, individuele functie afspraken etc. (NUOVO Safety Framework, Code of Good Governance for Secondary Education, Good Governance Code, Strategic Policy Framework, School Plan, Student Charter, Whistleblower Policy, Complaints Protocol, individual employment agreements).

2. Knowledge of the Code of Conduct

We expect all employees to be well-acquainted with the contents of this Code of Conduct and to take personal responsibility for gaining this knowledge. We expect the leadership team to regularly bring this Code of Conduct to the attention of their staff members.

Together we ensure that we continue to discuss our professional behaviour and the expectations regarding professional behaviour. We also ensure that (un)desirable behaviour is being discussed and that we are aware of what is and is not acceptable behaviour. It is everyone's responsibility.

When staff members join the organisation, the Code of Conduct is included as an appendix to the employment contract. This also applies to procurement agreements with business partners working on behalf of NUOVO. The Code of Conduct is accessible to employees, students, parents/guardians, external professionals, associates, and other stakeholders. They can find the Code of Conduct on the websites of all NUOVO schools, as well as on the NUOVO website.

3. Framework and principles

3.1. Values

In addition to the Grondwet artikel 1 (Constitution, article 1) certain values are fundamentally important for this Code of Conduct and the behaviour we expect from ourselves and each other: integrity, openness, reliability, and respect. We also emphasise our core value 'morality'.

Integrity

Integrity is generally recognised as a character trait. A person with integrity is incorruptible and adheres to their own standards and values, as well as those of the organisation they are affiliated with, even under external pressure. Traits such as honesty, reliability, carefulness, sincerity, and incorruptibility are typically associated with a person of integrity. NUOVO applies this concept of "integrity" to the organisation as a whole.

Openness

NUOVO provides non denominational education: our schools and offices (Bedrijfsbureau) are open to everyone, regardless of belief, religion, political affiliation, gender, sexual orientation, social or cultural background. We are open to others' opinions and new experiences. We are transparent, and we make ourselves accessible to others.

Reliability

We honour our commitments and can depend on each other. We do what we say and say what we do. Knowledge and information we possess by virtue of our positions and roles are used solely for the purpose for which that knowledge and information was acquired or provided. We adhere to the agreements within the organisation and make these transparent.

Respect

We value every individual in accordance with the Constitution (Grondwet). We respect the beliefs, opinions, and actions of others and ensure that no harm come to others through our behaviour. We treat others and each other carefully and in the same way we would like to be approached and treated by others.

Morality

Our morality includes our integrity and ethical actions. This goes beyond simply gaining knowledge about and showing affinity for diversity. We also contribute to equal opportunities and an inclusive society. Through our education, we help develop our students into active, constructive global citizens who care for each other and our environment.

3.2. Mission and vision

The mission and vision of NUOVO, as described in our strategic policy framework, guide our actions.

3.3. Laws and regulations

The NUOVO Code of Conduct aligns with existing laws and regulations, including:

- *Wet op het voortgezet onderwijs 2020* (Secondary Education Act 2020) and the accompanying *Uitvoeringsbesluit WVO 2020* (Implementing Decree 2020)
- *Wet vrij en veilig onderwijs** (Free and Safe Education Act)
- *Grondwet en Wet- en regelgeving met betrekking tot discriminatieverboden zoals de Algemene wet gelijke behandeling, de Wet gelijke behandeling mannen en vrouwen, de Wet gelijke behandeling op grond van leeftijd bij de arbeid, de Wet gelijke behandeling op grond van handicap en chronische ziekte en artikel 1 van de Grondwet* (Constitution and Laws and regulations regarding non-discrimination, such as the General Equal Treatment Act, the Equal Treatment Act for Men and Women, the Equal Treatment on the Grounds of Age in Employment Act, the Equal Treatment on the Grounds of Disability or Chronic Illness Act, and article 1 of the Constitution);
- *Wet Seksuele Misdrijven en wetten die vallen onder het strafrecht* (Sexual Offences Act and Laws that belong to the Penal Code);
- *Algemene verordening gegevensbescherming (AVG)* (General Data Protection Regulation (GDPR));
- *Arbowet* (Working Conditions Act);
- *CAO voortgezet onderwijs en CAO bestuurders voortgezet onderwijs* (Collective Labour Agreement for Secondary Education and the Collective Labor Agreement for Secondary Education Administrators).

4. Professional Responsibility

We are committed to providing a safe and pedagogically sound learning environment for our students, as well as a safe and professional workplace for ourselves and our colleagues.

General principles

We recognise our role as an institution for public education (denominational education) and ensure that students and colleagues feel welcome and safe at school by treating everyone with respect, regardless of gender, appearance, sexual orientation, cultural or religious background, political preference, or any other personal characteristic.

While we have the right to express our opinions, we must also consider the potential impact of our words on others, our school, and NUOVO before we voice our views.

We support each other in maintaining a professional attitude and behaviour in all situations, learning from and with each other.

We encourage the self-reliance of our students by helping them learn independently and take responsibility for their own learning.

We take each other and our students seriously, giving our full attention and listening carefully.

We are aware of our position and role, and the power imbalance this may create. We will never exploit this power for personal gain.

We consistently maintain a professional, businesslike demeanor to avoid situations that could bring discredit to ourselves or the organisation.

We handle information about students, colleagues, and parents/caregivers with care and confidentiality, never misusing the trust placed in us.

When we assess, based on the information we have, that there could be harmful consequences for an individual or the organisation, we do not withhold information and report this to the leadership team or a confidential advisor.

We address each other when we experience or observe forms of undesirable behaviour in each other or our students. We are open to giving and receiving feedback.

4.1. Aggression, violence, and bullying

We refrain from all forms of aggression, violence, and bullying. Such behaviour towards students or staff members is considered transgressive behaviour and can lead to disciplinary measures.

4.2. Relationships

It is possible that people in a work or school relationship at NUOVO (staff members, parents/carergivers, teachers, pupils/students/service providers) may have a private relationship, family connection, or friendship outside of work. We believe this is entirely acceptable as long as we maintain our professional conduct and role within the context of the general principles outlined above. We are aware of our position and function, and the inequalities of power that may arise from this. We never abuse this power.

When professional conduct in cases of relationships and contacts is a subject of conversation, or is the reason for a conversation, we expect staff members to have an open and proactive attitude towards colleagues and the leadership team.

If a relationship or contact between staff members leads to offensive behaviour, this will be regarded as transgressive behaviour. When there is a relationship or contact between staff members, we must always remember that in our professional role we are dealing with others in our work.

A relationship between staff members (for example, a friendship, family connection, romantic relationship, or sexual relationship) may give rise to a discussion with the the leadership team team when the interests of the organisation are at stake. In the case of such a relationship between a member of the leadership team and a staff member, this discussion will take place with the Head of School or Executive Board. When the interests of the organisation are at stake, or there is an imbalance of power in the workplace, this may lead to adjustments in working arrangements.

A romantic or sexual relationship between a staff member and a NUOVO student is not acceptable, regardless of age. We do not place students in a position of dependency or a situation of power imbalance. When we know of, or suspect, such a relationship or contact, we discuss and report it. Further information can be found in sections 4.3 and 7.3.

We expect each other and ourselves to address and end any intimate advances from students towards staff members in a respectful manner. We seek support with this when necessary.

4.3. Sexual harassment & transgressive behaviour

We refrain from any form of sexual behaviour or sexual advances in a physical, verbal, or non-verbal sense, whether intentional or unintentional, that may be experienced by the person subjected to it as unwanted, transgressive, or coerced, or that may be experienced as offensive by others in the organisation. This applies to our behaviour offline as well as online. We are aware that this may also include, for example: holding someone's hand (for too long), sexually suggestive questions, comments or humour, standing too close, or various forms of visual material. Reporting such behaviour is important. Further information about this can be found in Chapter 7.

Sexual acts, behaviour, and intimate relationships between a staff member and a NUOVO student are not permitted under any circumstances, regardless of age. Further information can be found in section 4.2 on relationships and section 7.3 on the duty to report, consult, and file complaints regarding sexual harassment and abuse in relation to students.

We have a duty to protect students and staff members from harm and (abuse of) power resulting from (sexual) harassment and transgressive behaviour, and to support them where necessary if they experience such situations. We report such situations. Further information about the reporting procedure can be found in Chapter 7.

5. Role models

Role model and responsibility

NUOVO staff members serve as role models for students, parents, and the wider community. We are therefore aware that our behaviour – even outside working hours and outside school – can influence the trust placed in our profession and in NUOVO.

As a general principle, staff members are of course free to act as they see fit in their private lives. However, in exceptional cases where behaviour outside working hours can be shown to have a detrimental effect on students, colleagues, or trust in NUOVO, this may lead to a discussion with the leadership team and, if necessary, to appropriate measures being taken.

5.1. Smoking, alcohol, and drugs

Smoking, vaping, and other forms of tobacco use are not permitted in NUOVO school buildings and school grounds, or at any other locations where educational activities take place.

We do not consume alcohol during or before work hours, nor are we under the influence of alcohol during work hours.

During activities or events organised by school, including after school hours and outside of the school premises where students are present, alcohol is neither served nor consumed.

We do not use drugs during or before work hours and are not under the influence of drugs during work hours. Naturally there is no trading, dealing, or providing of drugs and/or alcohol in any way whatsoever.

From our professional role, we are expected to take responsibility for our own behaviour and show responsibility towards each other. We address each other and, where necessary, inform the leadership team.

5.2. Clothing and personal appearance

We understand the importance of maintaining a well-groomed and professional appearance to fulfill our roles effectively.

Wearing headscarves or other religious head coverings is permitted within NUOVO, except when it hinders education or poses safety concerns. Face-covering clothing, including for visitors, is not permitted.

During practical and physical education lessons and at internships, the applicable (work) clothing regulations are followed in the interest of Safety.

5.3. Personal beliefs

Our public identity means that we are open and show respect for all personal beliefs. Everyone has the right to start from their own truth, their own life philosophy, or a religious conviction. We do not pass judgement on each other, nor do we try to persuade or convert others extensively. An individual belief is not a valid reason for not participating in school activities or not complying with agreements that apply with the school.

6. Business with integrity

We recognise our role as an organisation funded by public money. We act responsibly and with integrity in the deployment of these public funds.

We do our utmost to avoid any appearance of conflicts of interest and make our actions transparent.

We ensure that there is no mixing of personal and business relationships and interests.

6.1. Outside employment

In adherence with the Collective Labor Agreement (in Dutch: CAO), we seek approval when we wish to engage in paid outside employment alongside our employment contract. We never use NUOVO property or locations for carrying out permitted outside employment. Nor can a contract be entered into with a NUOVO school or the NUOVO central office (Bedrijfsbureau) from this outside employment alongside a NUOVO employment contract.

6.2. Intellectual property

NUOVO provides time and resources for educational advancement and innovation. Intellectual property developed for educational or organisational purposes belongs to NUOVO, and we refrain from accepting, sharing, selling, or exploiting it for personal gain.

6.3. Gifts and benefits

To prevent gifts from being misconstrued as compensation, we decline gifts, private discounts or anything similar in (the lead-up to) a collaboration, or other connections and relationships.

The provision of material goods to students requires authorisation from the leadership team and always relates to our educational responsibility.

We do not provide nor request money or goods to students for educational or ideological purposes without proper approval from the leadership team.

Occasional tokens of appreciation valued at €50 or less may be accepted from students, parents/caregivers, colleagues and business associates.

6.4. Corporate assets

We responsibly manage NUOVO's assets for work-related purposes only, ensuring they are not used for personal benefit. These assets include machinery, inventory, hardware, software, and transportation.

Terms for the private use of NUOVO-provided devices are outlined in the user agreement.

6.5. Privacy

Respecting privacy is paramount. We diligently adhere to privacy laws (GDPR) and NUOVO's privacy policies when handling personal data. Any uncertainties prompt consultation with our supervisor and the data protection officer before proceeding.

6.6. Digital and online conduct

When engaging digitally and online and/or providing education, we utilise NUOVO's secure systems and networks.

Staff members consult with the leadership team and the ICT department when they wish to use applications in relation to education and students that fall outside NUOVO's systems. In doing so, we safeguard the privacy of students and staff members.

We do not use private email or private accounts for work or education.

We conduct ourselves online and on social media in the same way we do in real life. The Code of Conduct therefore also applies in its entirety when we are active online.

6.7. Media and publicity

Engagement with media or the publication of work-related matters requires prior approval from the Head of School or the Executive Board.

We have the right to share work experiences on social media, and the duty to think about what the effect could be of a 'post', 'like', 'comment' etc. so that our school or NUOVO is not brought into disrepute.

6.8. Expenses

Expenses incurred in our roles are claimed according to established protocols, following authorisation from the leadership team or the Executive Board.

6.9. Fraud

In cases of (suspected) fraud, the NUOVO fraud procedure comes into effect immediately.

6.10. Sponsorship

We adhere to national agreements regarding sponsorship in secondary education.

7. Reporting transgressive behaviour

7.1. Reporting

If we experience someone crossing our boundary or that of another person, we will, if possible, first speak with the person who is crossing the boundary. Should this not be possible or desirable, we report our experience or observation to the leadership team.

Should this also not be possible or desirable, we report our experience or observation to a member of the *Mens & Organisatie* (HR) department, the internal or external confidential advisor, or the Executive Board.

If the report involves the Head of School or concerns a matter beyond the individual school level, we are expected to always report this to the Executive Board.

If the report involves the Executive Board, we are expected to report this to the NUOVO Supervisory Board.

7.2. Filing a Complaint

A formal procedure that is also available in cases of experiences related to transgressive behaviour is described in NUOVO's complaints procedure, which can be found on the NUOVO website.

7.3. Duty to Report, Consult, and File Complaints in Cases of Sexual Harassment, Sexually Transgressive Behaviour, or a Sexual Offence

Duty to Report

(Suspicions of) sexual abuse, sexually transgressive behaviour, or sexual harassment towards students must be reported immediately to the Executive Board. This also applies to confidential advisors or contact persons who receive such information in the course of their duties.

Reporting can also be done by informing the leadership team, who in turn inform the Executive Board. No staff member can invoke confidentiality obligations in such cases. NUOVO follows and acts in accordance with the duty to report, consult, and file complaints in cases of (suspected) sexual offences as prescribed by the Education Inspectorate and the law.

Duty to Consult and file a police report

In cases of (suspected) sexual offences or sexual harassment or transgressive behaviour, the Executive Board will consult with the confidential inspector of the Education Inspectorate. If it is concluded that there is reasonable suspicion of a sexual offence, the Executive Board is obliged to file a report with the police immediately. The Executive Board may delegate this duty to the Head of School.

7.4. Reporting Misconduct

In the case of (possible) misconduct relating to one of the articles from the chapter on 'business integrity' or misconduct involving a matter of public interest or the quality of education, the so-called Whistleblowing Procedure applies.

8. Consequences of non-compliance with the Code of Conduct

We strictly adhere to NUOVO's Code of Conduct. Non-compliance is treated seriously, with consequences ranging from disciplinary measures to termination of employment contracts, and in severe cases involving criminal offenses, reporting to the police. In doing so, all applicable written and unwritten legal principles and procedural safeguards are observed before proceeding to impose a measure or terminate the (employment) contract.

9. Development and establishment of the Code of Conduct

NUOVO's Code of Conduct was developed under the guidance of the Executive Board. Feedback was sought from all NUOVO school leaders. Guidance was provided by, among others, the VO-raad and Stichting School en Veiligheid. Prior to finalisation, advice was sought from the joined NUOVO Participation Council (GMR). The Supervisory Board was informed of the Code of Conduct. The proposed decision for adoption by the Executive Board on 12 May 2025. Decision for adoption by the Executive Board on 29 September 2025, with advice from the GMR (Joint Participation Council) on 26 September 2025.

The Code of Conduct is valid indefinitely and is evaluated once every 4 years. In the event of (interim) amendments to the Code of Conduct, school leaders, the GMR and the Supervisory Board are again consulted.