INTEGRITY CODE &
GOOD GOVERNANCE FRAMEWORK

2026-2030

- Sacred Heart School -

September 2026

Building Together - Achieving Together

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1. Purpose and position of this Code

Good education starts with trust. Everyone who works for, leads, supervises or represents Sacred Heart School (SHS) and SKOSaba must act honestly, fairly, carefully and in the interests of students and the school community.

This Code explains what integrity and good governance mean in practice. It should be read together with the Statutes, Management Statute, Executive Director and Supervisory Board regulations, Planning & Control Cycle, school plans, staff policies, complaints procedures and School Safety Plan.

The SHS Code of Conduct explains expectations for professional behavior, communication and daily school practice. This Integrity Code explains how we handle conflicts of interest, public funds, important decisions, governance and accountability. The two documents support each other.

If documents conflict, applicable law and the Statutes take priority. The Management Statute and approved mandates determine who has authority to decide. This Code does not give anyone new powers.

1.1 Legal and governance basis

This Code supports the governance requirements of the Wet Primair Onderwijs BES (WPO BES). These include clear separation between management and independent supervision, responsible use of public funds and accountability for good governance. The Code addresses professional responsibility for educational quality, integrity and conflicts of interest, and dialogue with parents and other stakeholders. The Supervisory Board monitors these duties within its legal role. Legal references in Section 16 must be verified before formal adoption.

2. Scope and definitions

2.1 Scope

This Code applies to the Supervisory Board, Executive Director, Management Team, employees, temporary staff, interns, volunteers, contractors and others acting for SKOSaba or SHS. Students follow the school's student rules and safety policies; this Code mainly sets duties for adults.

2.2 Key definitions

- Competent authority: SKOSaba, acting through the governance structure in its Statutes.
- Executive Director: the 'directeur-bestuurder' responsible for leadership and management within legally assigned powers.
- Supervisory Board: the independent body that supervises the Executive Director.
- Management Team (MT): school leaders who support the Executive Director within responsibilities given to them.
- Integrity issue: behavior or a decision that may break the law, this Code or professional standards, or harm legitimate school interests.
- Conflict of interest: when a personal, family, financial or other interest could influence a decision, or could reasonably appear to do so.

3. Our integrity and governance principles

These principles guide our work and decisions:

- Students first – decisions support safe, inclusive and high-quality education.
- Honesty – we do the right thing, even when no one is watching.

- Respect – we treat students, families, colleagues and partners fairly.
- Responsibility – everyone takes responsibility for their work and decisions.
- Openness – we explain important decisions and keep clear records.
- Clear roles – we respect the different responsibilities of staff, management and the Supervisory Board.
- Careful use of public funds – money and resources are used legally and for agreed school priorities.
- Dialogue and accountability – we listen, explain decisions and involve people in the right way.
- Improvement – we use evidence and the PDCA cycle to learn and improve.

4. Governance roles, independence and accountability

4.1 Executive Director

The Executive Director leads SKOSaba and SHS within the powers set out in the Statutes and Management Statute. The Executive Director prepares strategic and annual plans, puts approved policies into practice, oversees educational and legal requirements, manages risks and reports clearly to the Supervisory Board.

4.2 Supervisory Board

The Supervisory Board works independently from the Executive Director. It checks that the school is managed properly, follows the law and uses its resources responsibly. It advises and approves decisions when required by the Statutes and governance rules. It does not manage daily school operations. Its oversight includes educational quality, finances, risks, strategy and compliance.

4.3 Management Team and staff

The MT carries out responsibilities given by the Executive Director. Teachers and other staff are responsible for the quality of their own work within school policy. They take part in professional learning, keep agreed records, help improve the school and report concerns in time.

4.4 Participation and stakeholders

The Participation Council (MR), parents, staff, students (Student Council) and community partners are involved according to their legal or agreed roles. Consultation does not replace formal decision-making. SHS makes clear who gives advice, who has consent rights, who decides and who supervises.

5. Professional conduct and organizational culture

At Sacred Heart School, good governance starts with how we treat each other every day. Our professional culture is built on trust, respect, honesty, teamwork and responsibility.
Our 7 Promises, as described in the SHS Code of Conduct, form the foundation of positive behavior throughout our school. Although these promises are written in simple language for our students, they also reflect the values we expect all staff members, school leaders and members of the Supervisory Board to demonstrate.
By following these shared values, we lead by example and help create a safe, respectful and supportive school environment. We therefore expect everyone to:

- We speak with each other, rather than about each other, when this is appropriate and safe.
- We keep agreements and explain promptly when we cannot meet a deadline.
- We distinguish facts from professional opinions and personal views.
- We do not use our role, information or relationships for unfair personal benefit.

- We respect professional boundaries, including where one person has more power than another.
- We raise concerns respectfully when decisions or behavior may harm students, safety, quality or integrity.
- We do not punish or disadvantage someone for raising a genuine concern in good faith.

The SHS Code of Conduct contains the detailed expectations for daily professional behavior. Staff may express constructive criticism and report suspected misconduct through appropriate or legally protected channels. Professional loyalty does not mean agreeing with every management decision.

6. Conflicts of interest, related parties and fair decisions

6.1 Duty to disclose

Tell the appropriate person if a personal, family, financial, professional or other interest could affect your judgement, or could make others question your independence. This applies to Supervisory Board members, the Executive Director and staff. Examples include family connections, outside work, close friendships and business interests.

6.2 Taking no part in a decision (recusal)

If you have such an interest, report it before taking part. Do not help prepare, discuss, assess, select or decide the matter unless a formal decision allows your involvement. Record the concern, how it was assessed and any decision to step aside.

6.3 Recruitment, purchasing and contracts

Recruitment, purchasing, contracts and the use of school resources must follow approved procedures and be fair and transparent. Personal relationships must not lead to special treatment. On Saba, where people often know each other, openly reporting possible conflicts and keeping records are especially important.

7. Gifts, hospitality, donations and sponsorship

Gifts, hospitality and other benefits must never influence a school decision or create the appearance of influence.

- Refuse gifts linked to an ongoing tender, recruitment, negotiation, complaint, assessment or decision.
- Small tokens of appreciation may be accepted only when reasonable, open and unlikely to affect a decision.
- Report gifts that could raise doubts: staff to the Executive Director; the Executive Director to the Supervisory Board Chair; Board members to the Chair, or to the Vice-Chair/designated member when the Chair is involved.
- Donations and sponsorship must follow the school's policy and must not affect educational independence or student interests.

SHS does not rely only on a fixed dollar limit. Consider whether the gift is reasonable, transparent and independent of decisions. If unsure, report it before accepting.

8. Secondary positions and outside activities

Paid or unpaid work outside SHS must not interfere with school duties, misuse school information or resources, or create a conflict of interest. Report relevant outside roles to the appropriate supervisor. The Executive Director reports relevant roles to the Supervisory Board. Board members report their roles under the Board regulations.

9. Financial integrity and use of resources

School money, property and other resources must be used legally, carefully and for approved school purposes. Financial integrity is part of the Planning & Control Cycle.

- Follow approved budgets, spending limits, purchasing rules and decision-making authority.
- Do not approve your own expense, payment or contract when an independent approval is required.
- Identify, record, monitor and report financial or organizational risks when necessary.
- Use school property, ICT, vehicles and facilities mainly for authorized school purposes.
- Fraud, false records, unauthorized private use, bypassing controls and hiding financial information are prohibited.
- The Executive Director provides the Supervisory Board with timely and reliable reports on important differences from plans, risks and corrective action.

10. Confidentiality, privacy, information and communication

Handle information carefully and share it only with people who need it for their role. This includes student, staff, financial and governance information.

- Do not share confidential information with unauthorized people, including through private messages or social media.
- Use personal and student information only for legitimate school purposes and according to privacy requirements.
- Follow school rules on consent for photos, recordings and student communications.
- Keep accurate records showing what was discussed, decided, assigned and followed up.
- Confidentiality continues after someone leaves their role at the school.

11. Safeguarding, professional boundaries and a safe school

We protect students and staff from harm and follow the School Safety Plan, Anti-Bullying Policy, Child Protection Procedures and complaints arrangements.

- Aggression, intimidation, discrimination, bullying, sexual harassment, abuse of authority and retaliation are not accepted.
- Adults keep clear professional boundaries with students, including online.
- Report student safety concerns or suspected abuse through the relevant school and legal procedures.
- Staff must not work under the influence of alcohol or illegal drugs. Any limited alcohol at an approved adults-only event needs explicit permission and must never affect safety.
- Handle concerns fairly and with respect for everyone involved.

11.1 Certificate of Good Conduct (VOG)

Sacred Heart School is committed to providing a safe environment for every child. All employees who are legally required to have a Certificate of Good Conduct (VOG) must provide one before starting their duties.
The VOG must meet the requirements of the WPO BES and must not be older than six months when submitted to the school. SHS also checks whether volunteers, interns, temporary workers and external professionals need a VOG, based on their responsibilities, contact with students and applicable legal requirements.

The Executive Director is responsible for ensuring that the required checks are completed and properly recorded. VOG documents are handled confidentially and stored securely in accordance with applicable privacy requirements. No person may carry out duties requiring a VOG until the necessary requirements have been met.

12. Speaking up, complaints and suspected misconduct

12.1 Professional dialogue

Where appropriate and safe, first discuss a concern with the person involved. Direct contact is not required when there is a safety risk, serious misconduct, a power difference that makes this unreasonable or a required formal reporting route.

12.2 Where to raise a concern

If direct discussion is not suitable or does not solve the problem, use the appropriate management, complaints, confidential contact or whistleblowing procedure. Concerns about the Executive Director go through the designated Supervisory Board route. A Board member who is the subject of a concern must not take part in handling it.

12.3 Serious misconduct

Report suspected fraud, corruption, serious abuse of power, major safeguarding failures, deliberate breaches of law or other serious integrity concerns promptly through the appropriate formal channel. This Code does not prevent reports to a competent public authority when the law allows or requires them.

12.4 Fair handling and protection

We take reports seriously and handle them fairly, carefully and as confidentially as reasonably possible. We listen to those involved before reaching a conclusion. No one may be punished or treated unfairly for reporting a genuine concern in good faith.

Concern	Usual route
Everyday work concern	*Direct colleague or supervisor, where appropriate and safe*
Complaint or confidential concern	*Applicable complaints procedure or confidential contact person*
Concern involving the Executive Director	*Designated Supervisory Board route*
Serious misconduct / safeguarding	*Relevant formal reporting or safeguarding procedure; competent authority where allowed or required*

The exact contact persons and reporting steps must be kept current in the separate procedures.

13. Integrity in governance decision-making

Important decisions must be made carefully and clearly recorded. Records should show the issue, relevant information, any conflicts of interest, advice or consultation, the decision, who made it and what happens next.

The Executive Director manages the school. The Supervisory Board provides independent supervision, advice and approvals where required. Advice from the Board does not transfer daily management responsibility to it. The Executive Director provides the Board with the information it needs for proper supervision.

14. Planning & Control and the PDCA cycle

We monitor integrity and good governance through the existing Planning & Control and quality assurance system, rather than through a separate yearly exercise.

PDCA	What we do	Main evidence	Main responsibility
PLAN	*Set priorities, budget, review risks and policies*	*Strategic Plan, Multi-Annual Plan, Annual Plan, budget, risk register*	*Executive Director; Board approval/oversight as required*
DO	*Carry out policies, responsibilities and controls*	*Procedures, decisions, HR and finance records, Quality Cards*	*Executive Director, MT and staff*
CHECK	*Review quality, finances, risks and feedback*	*MARAP, education data, surveys, audits, complaints, Board reports*	*Executive Director and MT; independent Board oversight*
ACT	*Correct problems and improve plans or policies*	*Action logs, updated policies, Annual Report, next Annual Plan*	*Executive Director; Board within its formal role*

Important integrity concerns, conflicts of interest, weak controls and departures from governance arrangements are reported at the right level while protecting confidentiality. The Annual Report identifies the Code of Good Governance used by SKOSaba and explains relevant deviations as required by law.

15. Monitoring, evaluation and accountability

- The Executive Director makes sure this Code is put into practice.
- The Supervisory Board monitors the Executive Director's compliance and reviews major governance risks.
- The Executive Director reports serious integrity or compliance risks to the Supervisory Board without unnecessary delay.
- The Code is considered each year through Planning & Control / PDCA and formally reviewed at least once every four years, or sooner if needed.
- We use lessons from complaints, incidents, audits, feedback and Inspectorate findings to improve.
- Staff and relevant stakeholders are informed about this Code and its main expectations.

16. Compliance matrix – WPO BES and SHS governance

This table explains how the Code relates to the legal and governance topics identified in the September 2026 draft. Article numbers and statutory requirements must be checked against current WPO BES before adoption.

Requirement / principle	Where addressed	SHS connection
WPO BES Arts. 23–25: governance separation and supervision	*Sections 4 and 13: different roles and independent oversight*	*Statutes, Management Statute, Board regulations, P&C*
WPO BES Art. 125: good governance code and reporting	*Sections 1, 14 and 15: governance and annual reporting*	*Annual Report, Board oversight*
Art. 125(5)(a): professional expertise and educational quality	*Sections 3–5: professional duties and improvement*	*School Plans, Quality Assurance Framework*
Art. 125(5)(b): integrity and	*Sections 6–10: conflicts, gifts,*	*P&C, purchasing rules, risk*

conflicts of interest	*finance, resources and information*	*management*
Art. 125(5)(c): dialogue and accountability	*Sections 4.4, 5, 12 and 15: involvement, reporting and openness*	*MR, parents, Annual Report*
PDCA and quality improvement	*Section 14: plan, implement, check and improve*	*Strategic Plan → Annual Plan → MARAP → Annual Report → adjustments*

17. Adoption and document control

This Code is part of the SKOSaba governance framework and supports the applicable WPO BES requirements for good governance, integrity, accountability and independent supervision.

The Executive Director adopts the Code, subject to any approval requirements of the Supervisory Board and the applicable participation rights of the MR under law, the Statutes and Management Statute. These formal requirements must be verified before adoption.

Implementation is evaluated each year through the Planning & Control / PDCA cycle. The Code is reviewed formally at least every four years, or sooner when laws, governance arrangements or school needs change.

Document owner	**Executive Director, SKOSaba**
Approval / oversight	*Supervisory Board, as required by the Statutes and governance rules*
Effective date	*August 2026*
Formal review date	*September 2026*
Version	*September 2026*

Appendix

A - Related SHS policy framework

- Deed of Amendment / Statutes of SKOSaba
- Management Statute; Executive Director and Supervisory Board regulations; delegation and mandate arrangements
- Planning & Control Cycle SKOSaba
- Strategic School Plan A 2026–2030; Multi-Annual Implementation Plan B 2026–2030; Annual School Plan C 2026–2027
- Annual Report and financial statements 2025; MARAP
- SHS Quality Assurance Framework and Annual Quality Calendar
- School Safety Plan, Anti-Bullying Policy and Child Protection Procedures
- Complaints procedure and confidential contact arrangements
- SHS Code of Conduct / Staff Handbook
- Purchasing, financial control, sponsorship and donations policies
- Privacy and ICT policies
- Whistleblowing / reporting procedure, where separately adopted

B - Practical integrity check

Before making or participating in a decision, use this checklist as a final integrity check. If you cannot confidently tick YES, consider whether further discussion, clarification or approval is needed before proceeding.

Integrity check	YES	NO / UNSURE
Lawful & authorized Is the decision lawful and within my role, responsibility or mandate?	☐	☐
School & student interest Does it serve students, educational quality and the legitimate interests of SHS?	☐	☐
No conflict of interest Am I free from personal, family, financial or other interests that could influence — or appear to influence — my judgement?	☐	☐
Transparent & explainable Would I be comfortable explaining the decision and its reasoning to the Executive Director, Supervisory Board, auditor, Inspectorate, parents or the public?	☐	☐
Responsible use of resources If money or resources are involved, is their use proportionate, efficient and properly authorized by the right persons?	☐	☐
Right process Have the right people been consulted, and is the decision being made by the right person or body?	☐	☐
Properly documented Are the decision, reasoning, responsibilities and required follow-up documented clearly enough?	☐	☐
PDCA / follow-up Is it clear what will be monitored, when it will be evaluated and what action will be taken if the intended result is not achieved?	☐	☐

FINAL CHECK

☐ **ALL ANSWERS YES**

Proceed with the decision.

☐ **ONE OR MORE ANSWERS NO / UNSURE**

Clarify, discuss, disclose or seek the appropriate advice or approval before proceeding.

☐ **POTENTIAL CONFLICT OF INTEREST**

Disclose the conflict and do not participate in the decision until it has been determined whether participation is appropriate.

Formal Adoption and Approval

This Integrity Code & Good Governance Framework forms part of the governance and quality assurance framework of Stichting Katholiek Onderwijs Saba (SKOSaba).

By adopting and approving this Code, the Executive Director and Supervisory Board confirm their commitment to integrity, transparency, accountability and good governance within Sacred Heart School.

The Code will be implemented, monitored and reviewed in accordance with the school's Planning & Control Cycle and applicable governance arrangements.

Adopted by the Executive Director

Name: Willem-Jan van Hest
Position: Executive Director, SKOSaba

Date: _____

Signature: _____

Approved by the Supervisory Board

Name: Marc Vermeulen
Position: Chair, Supervisory Board, SKOSaba

Date: _____

Signature: _____

Effective date: 22 October 2026

Next formal review: October 2030