



www.partnersbg.org, www.humanrights-education.org

Partners Bulgaria Foundation

Code of Conduct

I. Mission, objectives and activities

Mission

Registered in 1998 under Bulgarian law, Partners Bulgaria Foundation (PBF) is an independent, non-governmental, not-for-profit organisation (NGO).

The mission of the PBF is to assist in the development of democratic processes and a sustainable civil space by disseminating methods and programs for peaceful conflict resolution, good governance and social inclusion; providing assistance to institutions, non-governmental organizations and specialists to improve policy and practice in the fields of justice, social care, child protection, education, economic development and environmental protection. The organization works to strengthen dialogue between civil society, government and the business sector and to promote the participation of vulnerable and marginalized groups and communities in decision-making processes.

The objectives of the PBF are:

- To assist in the formation and strengthening of civil society in Bulgaria;
- To assist in the development of a culture for the peaceful resolution of conflicts in all spheres of public life;
- To assist in the promotion of human rights and especially the rights of children and young people, as well as the rights of groups and communities in a disadvantaged social situation;
- To assist in the formation of a democratic approach to decision-making at various levels and spheres of public life.

The organization works to achieve its goals through the following activities:

- Research, analysis, evaluation and recommendations for policy change regarding the status of socially marginalized groups (including ethnic minorities, unaccompanied minors, children and youth at risk, juvenile offenders, etc.).
- Training and capacity development of organizations groups and communities.
- Organization of conferences, round tables and other forums; Development of partnership and cooperation with related organizations in Bulgaria, in Europe and in other countries; Mediation or mediation services to assist individuals, groups and organizations in resolving disputes and conflicts.
- Advisory services related to helping youth and children at risk and their families.
- Cooperative planning, facilitation of meetings and public discussions, and decision-making processes. The organization supports the creation of initiatives to solve problems of local importance.
- Public campaigns to draw public attention to human rights issues.
- Publishing.

II. Core principles

• **Responsibility and service to the public**

Partners Bulgaria is registered as non-for-profit organisation that serves for public purposes and is committed to work for sustainable development, peace and justice for all. PBF conducts its activities for the sake of its beneficiaries – women and youth, children, ethnic minorities and the wider communities. PBF recognises the impact of its activities to the public and is careful to implement a “do no harm approach”. PBF also exhibits a responsible and caring attitude towards the environment in its activities.

• **Respect for Human Rights**

PBF believes that all human beings are born free and equal in dignity and should be treated with respect. PBF is committed to uphold internationally recognized human rights of all people. PBF is a human rights education organization and that is why PBF especially uses efforts to avoid contributing to adverse human rights impacts. PBF is sensitive to the moral values, religion, customs, traditions, and culture of the communities we serve.

PBF is committed to promote the rights of children and has a special policy to keep children safe. PBF has a string child protection program and contributes to the work of the National Network for Children in Bulgaria.

Women rights and equality between men and women are in the core of PBF work. PBF promotes women rights through various projects and activities. The organization is cooperating with the Bulgarian Fund for Women and known for its programs combating discrimination against women. Example of such a project is related to combating Islamophobia against women and girls. Other examples of projects are related to women empowering in Kosovo, Jordan and Yemen.

- **Appreciating Diversity**

Diversity is core value for Partners Network and partners Bulgaria Foundation as one of its members. PBF collaborates with various groups and stakeholders, partners and members of community. PBF works with partners from various cultures and backgrounds. PBF works beyond borders of politics, religion, culture, race and ethnicity, within the limits of the organizing documents and with organizations and individuals that share common values and objectives. PBF is born in the international network PartnersNetwork and values diversity of its membership.

- **Cooperation**

PBF promotes partnership and cooperation. As a professional mediators organisation, PBF is looking for community wellbeing which is fostered by inter-sectoral cooperation, inter-religious, intercultural, and interracial work, and across artificial barriers of politics and ethnicity that tend to separate people and their institutions. PBF maintains ethical, cooperative relationships with other NGOs and networks of NGOs, for example, PBF is member of the European Peacebuilding Liaison Office /EPLO/ and Democracy and Human Rights Education in Europe /DARE network/. PBF is also member of the National association of mediators and the National network for children.

- **Transparency and Accountability**

PBF strives for openness and honesty internally and toward donors and members of the public. Annual reports, technical and financial are published for the public and can be seen in the Trade registry. PBF is transparent in all its dealings with the government, the public, donors, partners, beneficiaries, and other interested parties, except for personnel matters and sensitive information. The PBF governance structure, activities, staff and partnerships are open and accessible to public scrutiny in the website where PBF also informs the public about its work, projects and achievements as well as the source of its resources.

- **Truthfulness and Legality**

PBF is giving accurate, well documented, information to its donors, partner organisation, project beneficiaries and the public. PBF respect the national laws and the laws of jurisdictions in which it is active. The organisation is strongly opposing tax avoidance, corruption and bribery. PBF meets all legal obligations in Bulgaria and in the countries in which it is organized or works, including, laws of incorporation, fundraising legislation, child protection regulations, personal data protection, equal employment opportunity principles, health and safety standards, privacy rules, trademark and copyright legislation. The organisation takes corrective actions when wrongdoing is discovered among its staff, governing body, volunteers, contractors, and partners.

III. Integrity

- **Nonprofit**

PBF is organized and operates as a not-for-profit organization. Any surplus that is generated through its operations is utilized solely to help the organization fulfill its mission and objectives. No part of the net earnings of the PBF go to the benefit of the directors, officers, members or employees of the organization, or to any other private persons. All employees,

including the management, are compensated for their work through labor or civil contracts and according the available funds for staff in the various projects.

PBF is not operating for business purpose of carrying on a trade or business, unrelated to its mission and stated objectives. For example, PBF has registered a for-profit-body owned 100% by the foundation with the sole goal to support its mission and objectives. The PBF does not distribute profits or any assets for the benefit of individuals. Any surplus generated through operations or through the for-profit company is utilized solely to help the organization fulfill its mission and objectives.

- **Non-governmental**

PBF is an independent non-governmental organisation. PBF is not part of, or controlled by, government or an intergovernmental agency. The organization maintains independence and is not aligned or affiliated with any political party. It shares the values of democracy and actively promotes democratic development, human rights and European values.

PBF has no relationships with the government that may influence its work abroad. The organisation acts independently of any governments.

- **Organized**

Partners Bulgaria Foundation has a statute of incorporation, a board of directors, executive director and officers, regular meetings and activities. The board of directors meets minimum once a year to evaluate the work of the organisation, accept its audit reports, annual budget and plans. The organizing documents include a written constitution which clearly define the mission, objectives, governance structure, and rules of procedure. The organisation is legally recognized by the government since its incorporation in 1998.

- **Independent and Self-Governing**

PBF is independent organisation. Its policies, vision, and activities are not determined by any for-profit corporation, donor, government, government official, political party, or other NGO, including PartnersNetwork or its founder - PartnersGlobal. The organization governs itself autonomously, according to its governance structure, defined in the statutes. It is equipped to control its own activities.

- **Voluntary**

PBF is formed by private initiative, resulting from the voluntary actions of its founders who incorporated the organisation with a mission to promote mediation, other means of conflict resolution, a culture of peace and democratic development. These values and principles are the primary force in the way PBF is working.

PBF always have meaningful contributions from volunteers including people from the target groups and supporters. The board of directors of PBF consists of prominent members of society who chose to serve in the board a voluntary capacity, for no pay.

IV. Governance

- **Governance Structure**

PBF governance structure is defined in its constitution. It consists of a board of directors led by its chair. The board is supervising the management body and provides support related to the strategic development of organisation. It approves the organising internal documents such as updated organisational chart, staff policy, quality standards, child protection standards related to projects involving children and other procedures.

- **Structure of the governing body**

The board of directors consist of individuals who are dedicated to the mission of the organization, who volunteer their time and energies toward achievement of the mission, and able to offer substantial contributions to the organization. There are no family relationships among the board members.

- **Responsibilities of the governing body**

The PBF board of directors establish the direction of the organisation by creating the mission statement, reviewing it periodically for accuracy and validity, and revising it as necessary or desirable. It also determines the programs and services, monitors their compliance with the mission and their effectiveness and efficiency. It approves the annual budget and actively participates in the fundraising process. In approving the annual budget and programs. The board of directors provides oversight regarding legal requirements and participates in the formulation of strategic goals.

V. Conflict of interests avoidance policy

- **Applicability**

PBF conflict of interest avoidance policy applies, unless otherwise stated, to every person associated with the Partners Bulgaria Foundation – it applies to the members of the board of directors and the employees of the organization.

- **General policy**

a. Any person associated with the PBF shall avoid or manage any potential, actual or perceived conflict of interest (including by abstaining from participating in any decision-making or voting on matters subject to a potential conflict of interest). He/she should openly acknowledge any potential or actual conflict of interest, which arises from his/her relationship with the PBF.

b. The organization does not receive funding from funds, programs and other financing mechanisms, in the implementation of which its representative participates in any form.

c. Potential conflicts of interest must be identified and declared by the person in potential conflict of interest or reported by other members of the PBF as soon as they become aware of them. Members of collective management bodies and employees declare any actual or potential possibility of conflicts of interest.

d. Management of conflict of interest.

In all matters affecting the members of the board of directors of the foundation and/or the persons who have entered into an employment contract, civil contract or other type of contract with it, both the occurrence of a conflict of interest and the manifestation of indecent behavior should be avoided. In this regard, employees of the PBF inform the board in the presence or suspicion of any conflict of interest. The employees in question or the member of the board of directors, who are in situation of conflict of interests, cannot participate in the decision-making related to the conflict of interest. If the members of the board of directors of the foundation or the persons who have entered into an employment contract, civil contract, or other type of service contract with the foundation, hesitates whether a given behavior of theirs is illegal or indecent or could be the cause of a conflict of interest, lead to the occurrence on similar issues or to leave an impression of indecent behavior, the same should submit the issue for consideration at the next meeting of the board of directors.

e. Confidentiality. The members of the board of directors of the foundation and/or persons who have entered into an employment contract, civil contract or other type of contract with the foundation should not use for the purpose of financial or other type of benefit confidential information to which they have access due to the nature of their position or their relationship with the organization and are bound to observe the principles of confidentiality.

f. Best interest of PBF. When serving in the board of directors, directors shall put organizational goals before personal goals, and put the best interests of the organization ahead of individual desires.

Each director shall disclose all potential and actual conflicts of interest, including each institutional affiliation he or she has that might possibly involve a conflict of interest (such as sitting on a board of another NGO with overlapping goals and missions). Such disclosure does not preclude or imply ethical impropriety.

g. Loans to members of the board of directors or employees. PBF does not provide any loans to its staff and members of the board of directors or anybody else related to the organisation or not.

VI. Human Resources

PBF has a committed, capable and responsible staff, committed to the mission, which contributes to the success of the organization. PBF has both paid employees and unpaid volunteers, including in management and as individuals rendering program and support services. There is employees manual developed to guide people in organizational policy.

Employee's rights to freedom of association, political views, conscience and expression are respected and protected. People are enabled to communicate serious concerns to a member of the governing board or officer.

Qualification. The staff of PBF consists of highly qualifies experienced professionals, all of them holding with MA, MS or PhD in areas such as psychology, sociology, economics, financial management, political science, pedagogy, art and others. Most of PBF staff work for the organization long years. For new and existing staff PBF offers training and supervision.

Fairness. The staff is treated with fairness and equity. PBF staff maintains highest standards of professional and personal conduct, use information and resources responsibly, and avoid conflicts of interest.

Confidentiality. Guidance is provided to staff with access to official documentation or information regarding maintenance of the integrity, confidentiality, and privacy of such information. Written confidentiality agreement related to organization know-how and sensitive project documentation is signed by each staff member.

Personal data protection. PBF is licensed by the government to operate with personal information. PBF is keeping personal data safe and uses it only for projects purposes, usually anonymously. If the information is used in materials for public dissemination /e.g. quotations of opinions, photos/ it happen only with the written permission of the persons concerned.

Gifts and benefits. PBF staff is not encouraged to receive gifts connected with their position, nor to use their position for personal benefits. Employees have to work for the best interest of PBF, maintain its good reputation and always act in a way that gains public trust.

Policy against sexual misconduct and sexual harassment. PBF is committed to fight gender based violence, discrimination related to gender and any forms of sexual harassment. PBF is providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment.

PBF operates a zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment are taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

The mechanism for complains includes oral and written statement about the case submitted to the director or the vice-director of the organization. The case is taken seriously, all parties are a subject of hearing and the measures that follow ensure the safety of all concerned. Sanctions and disciplinary measures to anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions: verbal or written warning; adverse performance evaluation; reduction in wages; suspension; dismissal.

VI. Public Information

PBF provides public information for its work to inform the public about its mission, programs and the achievements.

Accuracy and timeliness. Information provided about the organization to donors, members, clients, staff, and the general public is accurate, timely and supported with documentation.

Annual report. Every year, PBF prepares and makes available to the public information on its programs and services. The information – technical and financial - is published in the Bulgarian Trade registry and it is available for public. PBF also provides access to appropriate minutes of meetings of its governing board.

Listing of governing body and officers. PBF makes available the names of its governing body and management staff in its website.

Partnerships. The organization makes available information on all partnerships, new projects and donors support in its public channels of communication – website and facebook account.

Confidentiality. The organization maintains the confidentiality of personal information on staff, clients and others, unless the individuals waive this right, or disclosure is required by law.

Memberships. PBF announces publicly all memberships in networks, national and international consortiums and joint projects.

Communications channel. PBF provides a communication channel, an email and Facebook messenger, for the public should they wish to make inquiries regarding the PBF and its activities.

Disclosure. Management body makes sure that the organization is complying with national and local laws regarding disclosure of information to the public.

VII. Financial Transparency and Accountability

Fiscal responsibility. PBF members of the board of directors hold ultimate fiscal responsibility and approve annually the organization’s financial statements and budgets. The financial statements are reported to the government every year.

Annual budget. The organization’s annual budget is prepared by the management and approved by the board of directors. It outlines projected expenses for program activities, fundraising, and administration. PBF operates in accordance with that budget.

Financial policies. PBF has established financial policies regarding the receiving and disbursement of financial resources, investment of assets, purchasing practices, internal control procedures (such as policies for authorizing payments).

Audit. When PBF has substantial annual revenue or a project budget above a certain amount, the accuracy of the financial reports are subject of audit by an independent, qualified accountant. When the annual gross income is smaller, PBF’s accounts are prepared and reviewed by qualified accountant.

Professional standards. The organization adheres to professional standards of accountancy and audit procedures as stipulated by the law in Bulgaria, and fulfills all financial and reporting requirements.

VIII. Legal Compliance

Laws and regulations. PBF activities and governance conform to the laws and regulations of Bulgaria and the countries where the organization works.

Attorney review. The organization has an attorney in its board of directors who does review organizing documents to make sure they are in compliance with existing laws and regulations.

Internal review. The organization periodically conducts an internal review regarding compliance of the organization with current laws and regulations and summaries of this review should be presented to members of the governing body.

IX. Use of Funds

Use of contributions. PBF ensures that contributions are used as promised for the purposes intended by the donors.

Grant commitment. When PBF accepts a grant, it is entering into a contract to carry out the program activities in an agreed-upon manner, and has an ethical and legal responsibility to honor that commitment.

Donor consent for changes. PBF may alter the conditions of a grant only by obtaining explicit consent by the donor.

Efficient and effective use. PBF ensure efficient and effective use of grants and charitable contributions.

X. Relationship with Donor

Donor relationship. The directors, management, staff and volunteers of PBF do not exploit any relationship with a donor or prospective donor for personal benefit or the benefit of any relative, friends, associates, colleagues, and so forth.

Confidentiality. Privileged or confidential information regarding the donor or donation is not disclosed to unauthorized parties.

Donor privacy. A donor's privacy is respected and an NGO must safeguard any confidential information regarding the donor. Donors are to have the opportunity to remain anonymous.

XI. Quality assurance

PBF compliance with quality of management and operations is recognized by Alfa Quality agency and in 2023 PBF is awarded certificate for **ISO 9001:2015 with area of application:**

Conducting trainings to increase the qualification of pedagogical specialists.

Consultancy services

Mediations, dispute mediation.

Publishing.

Management of projects in the field of education.

Social services.

See attached certificate.

XII. Dealing with misconduct

PBF defines behavior that's inappropriate to help avoid miscommunication and makes it clear what is intolerable behavior. Misconduct includes:

- Harassment, including sexual harassment
- Abuse or assault
- Bullying
- Intoxication
- Illegal activity
- Discrimination
- Plagiarism
- Conflict of interests
- Corruption
- Child abuse

PBF does address violations of the code of conduct on a case-by-case basis. Depending on the severity of the violation, an individual may receive a verbal or written warning. In worst cases it is possible to suspend or terminate the employment of the person who violated the code of conduct. A standardized process is used to ensure everyone is treated fairly.

Reporting of suspicions is decisive for an efficient fight against individual misbehaviour or corruption, fraud and conflicts of interest. Victims and witnesses of misconduct related to activities of PBF are encouraged to report cases.

Complaint mechanism

Victims or witnesses of misconduct ("complainants") inside and outside of PBF can report their complaints in two different ways.

Internal complaint channel

Misconduct or suspicions can internally be reported to the direct superior or directly to the following email-address:

partners@partnersbg.org

The information in the email should provide details about the case and about the type of the misconduct. The informant should state if the information should be kept confidential from all parties.

External complaint channel

The Confederation of the National Labour Unions in Bulgaria is a professional external provider, to which complainants can address in full confidence. The experts of the Confederation receive complaints and respect confidentiality and anonymity of the informer.

Telephone: 00359 885 970 345

XIII. Protection of whistleblowers and complainants

PBF protects the whistleblower's and complainant's identity unless such person agrees to be identified. Whistleblowers and complainants have to be assured that the information given will be treated in a confidential manner and above all that they will be protected against retaliation from within or outside the organization.

If the matter concerns law enforcement officials, then identification of complainants may be necessary to allow the PBF or the appropriate law enforcement officials to investigate or respond effectively to the disclosure. In some cases identification may be required by law.

Retaliation shall not be permissible against any whistleblower or complainant. "Retaliation" means any act of discrimination, reprisal, harassment, or vengeance, direct or indirect, recommended, threatened or taken against a whistleblower or complainant by any person because they made a disclosure of misconduct.

The protections the PBF can give to whistleblower or complainant are limited to the capability of the organization. The following protection and sanctions can be among those employed by the PBF depending on the circumstances:

- To the extent possible, PBF will guarantee confidentiality of the identities of whistleblowers and complainants. An individual who submits a complaint or is a witness in the course of an investigation shall have his or her identity protected.
- When a complainant reasonably believes he or she is threatened with retaliation because he or she assisted in an investigation the management shall provide reasonable and appropriate assistance to secure that person's protection;
- PBF shall guarantee employment protection in cases when staff person submits a complaint or information indicating fraud, corruption, or any other misconduct knowing or reasonably believing the complaint or information submitted to be true.
- Transfer upon the request of whistleblower to another position within the PBF;
- When there is no case to a claim raised by a whistleblower or a complainant, but it is clear that the PBF staff making such claim acted in good faith, the management shall ensure that the person suffers no retaliation.
- The whistleblower does not receive and accept payment or any other benefit from any party for such disclosure.

PBF staff has duty to disclose any case of corruption that come to their attention immediately but in any event not later than seven (7) days after becoming aware of the case. Staff should not cover-up any acts of corruption.

Staff members are discharged for reporting obligation once a report is made to his or her Supervisor or to the directors; or the board of directors.

The whistleblower shall have a prior opportunity to review any communication that would lead to exposure.