Code of Conduct

Anne Frank House

Version 2-10-2015
Contents
Introduction ........................................................................................................................................... 3
Orientation and scope ............................................................................................................................... 4
General rules of behaviour ....................................................................................................................... 6
Guidelines on supplementary investigations .......................................................................................... 9
Supervision and compliance .................................................................................................................... 9
Notification of (potential) conflicts of interest ....................................................................................... 9
Amendments ........................................................................................................................................ 10
Final provision ..................................................................................................................................... 10
Appendix 1. Regulations on gifts ........................................................................................................... 11
Appendix 2. Regulations on unacceptable behaviour ........................................................................... 12
Appendix 3. Guidelines on the use of internet and email .................................................................... 13
Appendix 4. Guidelines on the use of social media ............................................................................. 15
Appendix 5. Collections user protocol ................................................................................................. 18
Appendix 6. Regulations on CCTV surveillance .................................................................................... 19
Introduction

The aim of this code of conduct of the Anne Frank House (AFH) is to establish, in broad terms, the desired behaviour and professional practice of its employees, and to make it clear what clients of the AFH can expect from us, what the AFH expects from its employees, and what contractors and employees can expect from each other.

This is to prevent:

- conflicts from arising between the interests of the AFH and the personal interests of employees, or the impression being created that such conflicts exist;
- confidential information of the AFH being used for personal ends, or being provided to third parties;
- employees interacting in a way that is experienced as inappropriate;
- employees causing damage to the image of the AFH.

The Code of Conduct document will be formulated by the management board and submitted to the Employees’ Council for approval. It is a dynamic document, which will require periodic amendment as developments in the organisation and in society require. The code of conduct will be regularly (in principle annually) evaluated by the management board and the Employees’ Council.
Orientation and scope

This code of conduct of the AFH was last amended on 9 December 2014 by the management board, with the agreement of the Employees' Council, in accordance with article 2.5 of the AFH's employment conditions regulations.

A number of rules of behaviour have been formulated within the code of conduct, which offer a transparent framework that AFH employees should adhere to in carrying out their work. The basic principle is that all AFH employees should as far as possible act in accordance with the spirit as well as the letter of the provisions of this code of conduct. Non-compliance with the code of conduct can have consequences (see ‘Supervision and compliance’).

The code of conduct applies to all permanent and temporary employees of the AFH. It is essential that all AFH employees understand and endorse the code of conduct. To this end, all employees of the AFH will receive a copy of the code of conduct to be signed before the employment commences.

The code of conduct also applies to external employees, such as temporary employment agency workers, volunteers, outsourced employees (e.g. cleaning service), interim and freelance employees who work for the AFH. External employees will receive a copy of the code of conduct through their managers before the assignment begins.

The latest version of the code of conduct will be published at the intranet. We insist that everyone must be fully familiar with the content of this code of conduct. Its importance for all employees of the AFH cannot be overemphasised.
Core values and characteristics
The core values formulated in 2011 in the Strategic Plan 2012-2015 form the basic principles for our conduct:

The Anne Frank House can in many ways be regarded as a value-driven organisation. It is important to make these values explicit. Five core values form the DNA of the organisation: we are inspirational, connecting, open, independent and publicly oriented.

We want to inspire our museum public and the target groups of our educational programmes on the basis of an honest, high-quality presentation of the life story and work of Anne Frank to reflect on their current significance and to take up an active attitude to expressing this significance.

We have a connecting role in our mission, which is focused on learning to live together in a community of people with very different backgrounds and beliefs. We want to contribute to the search for a new balance in the values that can form the common foundation of such a society. To this end we also connect the past with the present.

To be able to operate in a way that provides connections, we are open and accessible, also in the literal sense that we want to be as open as possible to people who want to visit the museum. We are open to and interested in our target groups, new developments in the world around us and new partnerships.

The Anne Frank House is independent in the political, ideological and religious field. We are a mission-oriented organisation, which steers its own course and does not wish to be dependent upon third parties. In this context, independence is also understood as objectivity.

We are publicly oriented in our focus on the visitors to the museum and the target groups of our educational programmes and materials. We are interested in who they are, their concerns, and how we can reach them with our aims and our products and services.

In parallel with these core values, the following characteristics of the Anne Frank House have been formulated, which together form the profile of the organisation: high-quality, authentic, unique, socially relevant, aims and results oriented, historical and international.

In order to anchor the core values of an organisation in its activities, it is necessary that the same values can also be identified in its internal functioning. We can only be inspirational, connecting, open, independent and publicly oriented in our activities if we behave in the same way towards each other. This also applies to the characteristics of the organisation.
General rules of behaviour

Integrity and independence
Integrity is a value upon which we can be called to account with regard to our conduct. We act with integrity when we adhere to the values associated with the Anne Frank House, and when we refrain from making improper use of our authority or position.

We operate independently in the sense that we do not have any political, ideological or religious affiliations.

Professionalism
We work in a professional manner. That means we work purposefully and carefully, we work in partnership, and we make use of each other’s knowledge and skills, attuning our own efforts to the needs and wishes of internal and external visitors and customers.

Collegiality
We treat each other and third parties with mutual respect.

Resources and equipment
We use the resources and equipment that we have at our disposal with care. The use of resources and equipment for private purposes is not permitted without the prior consent of the management board. Examples of resources and equipment include office supplies, mobile devices and computers. Enabling the unauthorised use of resources and equipment by others, regardless of how this occurs, is also not permitted.

It is not permitted, other than in the performance of the employee’s duties, to make copies of software and data from third parties, including downloading them, without the approval of the employee’s manager.

Collection
We treat the collection of the Anne Frank House (including items on loan) with care, and we adhere to the regulations and user protocol for collections that are enclosed as an appendix to this code of conduct.

Confidential information
We treat the information held by the Anne Frank House with care. Sensitive and confidential information will not be discussed or shared (including sharing online) with third parties outside of the AFH, and will be stored at the workplace and/or in digital form in a careful manner (clean desk policy). The private numbers and home addresses of current and former employees will not be provided to third parties without the prior permission of the employee concerned. This obligation continues to apply after the employment had ended.

Alcohol and drugs
The use of alcohol or drugs at work is not permitted. The moderate consumption of alcohol is permitted at functions attended by employees by virtue of their position.

Private use must not impede the employee’s functioning at work.

If the employer establishes, or has reason to suspect, that alcohol or drug use are having an effect in the working environment, then the employee will be called to account with regard to this point immediately, with the primary aim of making the consequences of the behaviour clear and preventing its repetition.

In the event of repeated behaviour, the AFH will request the employee to take an alcohol or drugs test to determine whether he or she has used alcohol and/or drugs. If the employee refuses to take this test, and the use of alcohol and/or drugs is confirmed, disciplinary measures as stated in the AFH employment agreement will follow.
Smoking
Smoking is not permitted inside AFH premises. Smoking is permitted outside (there is a special covered seating area in the garden for this purpose).

Telephone calls
Private telephone calls may be made to a very limited extent, provided that the work does not suffer as a result. Private telephone calls may not be made in public areas such as the museum and museum café.

Recording of telephone calls and camera images for security purposes
The incoming telephone calls of employees who make use of the telephone at the reception desk, the back office/customer contact unit and the information desk will be recorded for security purposes. The recording will stop when the call ends, and if the call is transferred to an internal extension.

The recording equipment will be administered by the ICT/IM unit, and is a component of the AFH telephone exchange. Recordings will be retained for a period of two months. After this retention period the recording and/or copy in question will be deleted or destroyed. The recordings will be stored securely, and will only be accessible to the ICT/IM unit manager, the security coordinator and the AFH management board. Authorisation for such access will be issued by the security coordinator.

Recorded incoming telephone conversations will only be listened to if there is a reason for doing so for security purposes. If necessary, the recordings will be provided to the police and the judicial authorities. The security coordinator will first consult on this with the ICT/IM unit manager and the management board.

Listening to recorded telephone calls falls under the direct responsibility of the security coordinator. The privacy of both employees and visitors/customers is safeguarded by the rule that, at a minimum, the security coordinator and a representative of the AFH management board must be present when telephone conversations are listened to (the "four ears principle").

The AFH makes use of CCTV surveillance for the purposes of security and entry control of the buildings and grounds of the AFH, safeguarding employees and visitors/persons present in buildings and grounds of the AFH, prevention and registration of nuisance (such as vandalism), prevention and registration of criminal acts (such as break-ins, theft or destruction of property) and all directly related matters. The CCTV surveillance regulations are enclosed as an appendix to this code of conduct.

Work clothing
Employees who work in the museum must be recognisable to visitors, and therefore wear work clothing. We always present a smart appearance at work. Revealing clothing (such as crop tops, shorts and short skirts) and visible tattoos are not permitted.

Statements
Our employees are representatives of the AFH, and should be aware of the responsibility that this entails, in both their work-related actions and their personal conduct. We do not make any discriminatory, sexist or otherwise offensive statements that exceed the bounds of decency and/or damage the reputation of the AFH. We also do not make any public political or religious statements on the communication channels of the AFH.

If you appear in the media in a personal capacity, you should be reticent in stating your employment with the AFH and the nature of your work.
Spokespersonship and media contacts
Communication takes place from all levels of the AFH. From an outgoing email to the opening speech of an exhibition, from the way we answer the phone to the choice of projects we carry out (or decide not to carry out): these are all aspects of communication. All of our communications contribute to the identity and the image of the AFH. This means that communication is the explicit responsibility of the entire organisation.

The media are an important intermediary for the AFH. They can help us to reach our target groups and achieve our project aims. They also offer the opportunity to disseminate our knowledge and expertise among a wide audience. On the other hand, a slip-up in the media can seriously damage our reputation.

To ensure clarity and consistency, the Communication department has a central role in public statements. It coordinates media contacts, provides initial responses and refers to the most appropriate colleagues for specialist expertise. The management board can be consulted on all matters, and decide on public statements on controversial issues.

All this means that employees who are approached directly by journalists with questions concerning the AFH's sphere of work, or that may bring about conflicts between the interests of the AFH and the private interests of the employee, should refer the journalist in question to the Communication department. The Communication department analyses the situation, decides - sometimes in consultation - whether the AFH wishes to cooperate, and coordinates the subsequent contacts.

Issuing press releases and organising press conferences is the sole preserve of the Communication department. Of course employees can suggest subjects for press releases, but the decisions on press releases and their content are made by the management board.

Unexpected emergencies can have a major effect on an organisation's image. With effective crisis management, where the organisation attempts to deal with a problem situation as effectively as possible, the damage can be limited, especially when the twin principles of crisis communication - speed and openness - form the core of the response.

In the event of a crisis, or potential crisis, where there is a danger of negative publicity, the employee should contact the Communication department immediately. The Communication department will then take the necessary steps, in cooperation with the management board and the employee/department concerned.

Other rules of behaviour
In addition to the general code of conduct, the regulations listed below also form a part of the AFH code of conduct.

- Regulations on gifts
- Regulations on unacceptable behaviour
- Guidelines on the use of internet and email
- Guidelines on the use of social media
- Collections user protocol
- Regulations on CCTV surveillance
The following codes of conduct apply to specific positions, and should be separately signed in agreement before the commencement of the employment or assignment:

- Code of conduct on monetary transactions for public employees
- Code of conduct on monetary transactions for public employees, Financial Administration
- Code of conduct for permanent and temporary museum café employees

**Guidelines on supplementary investigations**

Supplementary investigations may be carried out in the event of any infringement of applicable legislation and/or codes of conduct by AFH employees that may lead or has led to direct financial damage and/or damage to the good name, integrity or security of the AFH. The employee concerned will be informed in advance of the commencement of a supplementary investigation.

The registration and coordination of the supplementary investigation will be carried out on the instructions of the management board. The investigation initiated after an incident report is received is concerned with the collection of all facts and circumstances that could be of importance in relation to the incident. To this end, all information available to the AFH as this is established in the context of normal operations and in interviews with (involved) employees will be used, taking due regard of the legislation in the field of privacy (Personal Data Protection Act), the various interests represented by the investigation and the degree of intrusion into the privacy of the employee concerned.

If the suspicion that led to the investigation turns out to be unfounded, a full rehabilitation of the employee(s), both verbally and in writing, will follow. Both the content and the manner of rehabilitation will be determined in careful consultation with the employee(s).

**Supervision and compliance**

**Notification of (potential) conflicts of interest**

The employee is obliged to notify the manager, or the next most senior manager, of any (potential) conflict of interest. If the employee concerned has any doubts about the applicability of the code of conduct or its interpretation, he or she should consult the management board or the Human Resources department.

Every employee of the AFH is required to behave in accordance with the code of conduct, and in case of doubt about its correct application to immediately consult with his or her manager.

Every manager within the AFH will ensure that the employees carry out their work in accordance with the provisions of this code of conduct.

Non-compliance with the code of conduct may lead to a supplementary investigation and the taking of disciplinary measures as stated in the AFH employment conditions. The disciplinary measures may include a suspension or an (immediate) termination of the employment, employment agency contract, hiring contract, secondment contract or other form of contract for professional services.
Amendments
The provisions established in this code of conduct may be amended or supplemented, at the discretion of the management board and the Employees' Council, in accordance with article 2.5 of the AFH employment conditions.

Final provision
The undersigned employee hereby declares that he/she has read, and will comply with, this code of conduct.

Employee: ___________________________  Date: ________
Appendix 1. Regulations on gifts

Employees should avoid becoming involved in situations in which accepting a business gift or an invitation for any form of entertainment from a professional associate or aspirant business associate could influence their decisions. It is not permitted that even the impression of a possible influence is created. Employees should therefore be careful and extremely reticent in connection with accepting gifts, services and invitations.

**Business gifts**
In principle, an employee who has received a gift by virtue of his position should return it to the giver with the explanation that employees are not permitted to receive such gifts.

By way of exception, an employee does not have to return or send back a gift in cases where the return would seriously embarrass the giver, or if it is unfeasible to return or send back the gift for practical reasons. This will be decided in consultation with and at the discretion of the employee’s manager.

Gifts that are accepted, such as those given on the occasion of New Year, should be restricted to small items with a commercial value of no more than approximately €25. The employee’s manager must be notified of business gifts that are accepted. The manager, together with the Human Resources department, will determine whether business gifts should be handed in to the Human Resources department and, if so, what collective purpose will be found for them.

**Gifts**
Employees are not permitted to accept financial gifts from third parties. Visitors and professional associates who wish to make gifts will be referred to the donation box in the museum or the donation page on the website.

**Invitations**
Invitations for trips, seminars, cultural events, company visits and other events may only be accepted with the manager’s approval.

**Services**
It is not permitted to accept offers of goods or services with unusually high discounts or at non-market standard prices.

Private use by employees of the services of suppliers, contractors, maintenance services and/or commercial service providers with which the Anne Frank House or its affiliated organisations maintain contacts is not permitted, except with the approval of the management board. The management board will only grant approval if no alternatives are possible, and the work must be carried out under market-standard conditions. A copy of the quotation should be provided as confirmation of this.
Appendix 2. Regulations on unacceptable behaviour

Bullying, intimidation, malicious gossip, sexual harassment, aggression, violence and discrimination are, for the AFH, all forms of unacceptable behaviour. They can be experienced as inappropriate, objectionable, hurtful or threatening. In this regard, the employee determines what is unacceptable.

Complaints
Employees are not permitted to behave in an unacceptable manner within the premises of, or in the name of, the AFH. An employee who experiences unacceptable behaviour can submit a complaint if he or she experiences negative consequences as a result of the behaviour. The AFH has appointed an external confidential counsellor to receive such complaints and provide guidance to the employee.

Confidential counsellor
The management board and the Employees’ Council will, in mutual consultation, appoint a confidential counsellor, whose contact details will be posted on the intranet. The confidential counsellor will, in strict confidentiality, provide support in, and possibly advice on, the manner in which the unacceptable behaviour can be stopped. If necessary, the confidential counsellor can also call in a mediator. If so wished, the confidential counsellor will bring the matter to the attention of the management board and/or the departmental manager. This will only be done at the employee’s request.

Unacceptable conduct Complaint Committee
For complaints relating to unacceptable conduct the Directors will appoint an external Complaint Committee. This Committee will investigate the claim and if sustained, shall further settle the complaint according to the guidelines set out in the Policy for preventing undesirable conduct AFS, Appendix 2. The Complaints Committee shall then advise the Directors on appropriate procedures to be taken.
Appendix 3. Guidelines on the use of internet and email

Employees may make use of internet facilities for their work: visiting websites, downloading work-related information from the internet and sending and receiving electronic mail. The general standards of proper professional conduct and decency apply to the use of internet and email.

User account
Employees who make use of internet and email via the AFH network will be given an individual user account. Access to the network is secured by means of a password. Passwords must be reliably and securely stored by the employee. On leaving the workplace, employees should lock or switch off the computer. Employees are not permitted to log in to the AFH network by means of other user accounts than their own.

Email
All outgoing email must be provided with a standard signature in accordance with the AFH house style, which is published on the intranet. It is not permitted to send or receive emails of a pornographic, violent or discriminatory nature. Employees who receive emails of this nature should report this to the security coordinator. It is also not permitted to send e-mailings or advertising emails without the approval of the Communication department.

Employees who receive unpermitted emails should delete them immediately. If multiple emails are received from the same sender, they can be forwarded to the ICT/IM unit with a request to block the sender.

Software
Antivirus software is installed to protect against viruses, Trojan horses and other software that can be damaging to the computer and the AFH network. This antivirus software should be switched on at all times. Software may only be installed on the computer by the ICT/IM unit, and in consultation with them. It is not permitted to download (illegal) software or music.

Personal use
Personal use is permitted to a limited degree outside of working hours (e.g. during breaks). Personal visits to websites that are pornographic, violent or discriminatory are not permitted. This also applies to the downloading of information, to exposing the computer/network to an increased risk of viruses, Trojan horses or other potentially damaging software, and to sending or receiving emails of a pornographic, violent or discriminatory nature. Personal use of the internet and email on computers and mobile devices is not permitted in public areas such as the museum and the museum café.

Monitoring
Internet traffic is monitored for the amount of data that can be transported via the AFH network, and for peak data loads. This monitoring is carried out by the internet service provider. Internal equipment, such as routers, firewalls and switches, is also monitored to safeguard the performance and continuity of the computer network.

Individual internet and email use can be monitored following misuse of the internet or email (see description under "Personal use", or on suspicion of such misuse. After a (possible) infringement, the employees concerned will first be called to account with regard to their use of internet and email by their manager or the Human Resources manager. If after this discussion there is reason for further monitoring of the use of internet and email, the Human Resources manager will submit a request to that end to the ICT/IM unit.
In general, the monitoring of equipment and data traffic always has the primary aim of safeguarding the performance and quality of the computer network. Unauthorised access to the network is also monitored. The AFH employs the information security standard (NENi ISO/IEC 27002:2013) for monitoring.
Appendix 4. Guidelines on the use of social media

The possibilities of social media are almost endless. The AFH sees opportunities to use social media to increase the recognition of the educational and other activities of the AFH, to strengthen our links with our public and to enter into dialogue with them.

Every employee of the AFH is an ambassador for the organisation, and partly responsible for its reputation. At the same time, this entails responsibilities.

These social media guidelines provide guidance on the possibilities and responsibilities of the use of social media. They form a part of the generally applicable code of conduct within the AFH. All AFH employees are expected to know and to comply with these guidelines.

1. Who are these guidelines for?
For all AFH employees who use social media for work-related or private purposes, or are involved with this.

2. What are social media?
Social media is a collective name for all internet applications that allow information to be shared in a user-friendly way. Social media are online resources and technologies through which people remain in constant contact and provide the content themselves, with mutual interaction and dialogue. Information such as text, videos and photos can be shared at any time, for example via online networks (Facebook, LinkedIn), microblogs (Twitter), websites for sharing videos, photos and locations (YouTube, Flickr, Instagram) and blogs. With the increased use of mobile internet, people remain in constant contact with each other even when they are on the move. Information and news are available at any time and place.

3. Administration
The AFH is active on various social media channels. This is a form of external communication, and falls under the responsibility of the Communication department. Everything we communicate must be in line with the communication policy and the core values of the AFH.

The Communication department administers the AFH's social media channels on Facebook, YouTube, Twitter, Flickr and LinkedIn. The various departments are responsible for their own interaction with their target groups. This means, for example, that the Educational Projects department will carry on the interaction with its target group through social media, and be responsible for the relationship with this target group.

Social media accounts for specific projects may only be opened in consultation with and with the approval of the Communication department. The Communication department carries out the overall monitoring of all social media channels.

1 The world of social media is dynamic. In the near future new channels will certainly open up, and old channels will disappear.
2 See memorandum Anne Frank House – Social Media Policy.
4. **Personal versus work-related**
The AFH recognises the possibilities of social media, and takes a positive view of employees make active use of them. Employees are permitted to be active on social media during working hours provided that this concerns work-related content. The social networks enable the AFH to act as a "listening ear" within our networks, to gain knowledge and to be socially engaged. This contributes to the quality of the work of the AFH.

In the online world, work and private life are easily intertwined. Personal messages on social media can have an influence on the AFH and its public image. Once followers and friends know that you work at the AFH, they may comment on this. Your statements can be seen as "Anne Frank House statements." So everything you write can have an impact on your own professional reputation as well as the Anne Frank House's public image.

You should be aware that as an employee you are also an ambassador of the AFH. Your presence on social media is comparable with attending a party where your colleagues and friends, managers and clients are also present.

5. **Basic principles**
The AFH applies the following principles to the use of social media:
- You are personally responsible for the content you publish on social media networks.
- Be careful with your privacy (and with it the privacy of the AFH).
- Taking positions in public can be in contradiction with the interests of the AFH, and cause conflict. So it is advisable to be reticent in posting extreme points of views or potentially controversial messages, and to be aware of the influence this can have on your personal reputation and that of the AFH.
- Feel free to participate in discussions of the latest developments in your professional field on social networks.
- If you come across negative messages about the AFH, do not respond yourself, but forward them to the Communication department. Employees who post messages on a subject connected with the AFH online, other than on the channels of the AFH, should make it clear if they are doing so in a personal capacity. If they are speaking on behalf of the AFH, they should mention the organisation and their position within it. If the publication does not form a part of the employee's work, prior permission for this is needed from the employee's manager. The Communication department must always be informed of the publication.
- If an online discussion on either an AFH media platform or a personal media platform gets out of hand, or threatens to get out of hand, you should immediately contact your manager and the Communication department to consult on the strategy to be followed.
- The management board, heads of department and employees who publicise the policy and strategy of the AFH have a special responsibility in their use of social media. People in certain positions in the AFH will always be seen as representatives of the organisation, even when they are expressing a personal opinion. Make sure that your conduct is in keeping with the image that the AFH wishes to project.

6. **Do's and don'ts**
**Do:**
1. Use a personal account name (and a personal photo to put a face to your profile).
2. Place messages in your own name, and use the first person (I). Feel free to state in your profile that you work at the Anne Frank House, and what your interests are.
3. Always follow the general code of conduct of the AFH. This also applies to social media.
4. Use your common sense, be honest and be polite.
5. Respect copyright, and do not use material belonging to others without their permission. State your sources where appropriate.
6. Admit mistakes, and offer your apologies when necessary.
7. Check the responses to messages that you post, and make sure they are as respectful as your own contribution. If that is not the case, then you can politely draw this to people’s attention and, if possible, delete the response.

Don’t:
1. Don’t use the Anne Frank House name or logo in your profile. We have official accounts for this.
2. Don’t respond to critical comments about the AFH. Everyone has the right to their own opinion. If you come across negative messages about the AFH, don’t respond yourself, but forward them to the Communication department. If facts are misrepresented, the Communication department can consider posting a response.
3. Don’t post any information on social media concerning visitors, partners or suppliers without their approval. No distinction is made here between information on a product, a person or an organisation.
4. Don’t distribute any internal information.
5. Don’t act as a spokesperson for the AFH. This is always done under the responsibility of the Communication department.
6. Don’t quote colleagues, or use their material without permission.
7. Don’t respond to legal issues or crisis situations, but inform your manager and the Communication department of them immediately.
8. Don’t post messages that are critical of partners or competitors.

Material on the internet stays there forever. Online messages are always able to be found, and can be picked up by other media.
Appendix 5. Collections user protocol

The Anne Frank House is responsible for the administration and preservation, accessibility and interpretation of the Anne Frank Collection that it curates. Research into the history of the Frank family must have a connection with the mission and objectives of the Anne Frank House, and must be carried out with due regard to legal, ethical and scientific standards. The AFH is bound to its legal obligations, and acts in accordance with the provisions of the Museums Ethical Code (available on intranet) in relation to all aspects of the administration of its collection, the performance of research and the application of research results.

All employees are obliged to follow the policy guidelines and procedures of the AFH:

- Access to the digital depot and the use of the knowledge databank are granted and coordinated by the Collections department.

- Employees will protect all confidential and privacy-sensitive information that they have acquired by virtue of their position. Images from the collection, information on the collection and knowledge arising from the collection (as recorded in the knowledge databank) must not be made public or provided to any other organisation (including the partners of the Anne Frank House) or individual without the prior explicit permission of the Collections department.

- The copyright on the Anne Frank Collection in the digital depot and the knowledge bank rests with the Anne Frank House or with third parties. Before these items are used, the Collections department must first establish the ownership of the copyright on them. All instructions of the Collections department must be followed when applying research information in materials and activities.

- If the information in the digital depot and the knowledge bank give rise to new interpretations and/or understandings that are not wholly or partly consistent with the content of the current materials of the Anne Frank House, then the Collections department must be consulted on this before any public announcement is made.

- The Collections department must verify the historical accuracy of any end product relating to the Frank family before any public announcement is made.

- The entire collection of information in the knowledge bank is the intellectual property of the Anne Frank House, and is legally protected as such.
Appendix 6. Regulations on CCTV surveillance

Nature of the CCTV surveillance
The Anne Frank House makes use of CCTV surveillance for the purposes of security and entry control of the buildings and immediate areas around the AFH, safeguarding employees and visitors/persons present in buildings and immediate areas around the AFH, prevention and registration of nuisance (such as vandalism), prevention and registration of criminal acts (such as break-ins, theft or destruction of property) and all directly related matters.

CCTV surveillance will not be used to observe employees except for the purposes listed above. The CCTV surveillance will be made known through the presence of visible screens at certain locations in the building, and in other clearly recognisable ways if the situation calls for this. The recorded images can be viewed at any time.

Implementation of the CCTV surveillance
The CCTV surveillance will be implemented in practice by an external company, which will report incidents, exceptional circumstances and/or unsafe situations to the security coordinator on a daily basis. The AFH remains ultimately responsible for the implementation of the CCTV surveillance at all times, and retains the ownership of the recorded images.

Storage period of camera images
After they are recorded, the images will be stored for a week with a view to their use for the purposes listed under "Nature of the CCTV surveillance". After this period expires, the images will be deleted by overwriting them with a new recording.

If an incident connected with the issues listed under "Nature of the CCTV surveillance" is visible on the images, these images may be stored for a longer period, until the incident is resolved. If it is no longer necessary to store the images in connection with the incident, they will be immediately deleted.

Access to and protection of camera images
The external company has taken appropriate measures to prevent unauthorised access to and misuse of stored camera images. This is specified in the contract with the external company, and is monitored annually.

The area in which the images are stored by the AFH is physically secured against access by unauthorised persons with a key, entry pass, etc. The images are stored in a separate, closed system, and are not accessible via the network to anyone other than the external company. The AFH employees who are authorised to view the images are the security coordinator, the managers and the technical department employees. They are all bound to confidentiality. Access to the images is secured with a password, and only possible by two people at the same time (the "four eyes principle").

Viewing and copying camera images
A person who is shown in camera images may view the images in which he or she is clearly visible. An appointment for this purpose can be made with the security coordinator.

A person who is shown in camera images can acquire of copy of these images by submitting a written request, stating reasons, to the security coordinator.

A request to view or receive a copy of images must be accompanied by a clear indication of the time period in which the person concerned suspects that he was filmed. No charge will be made for the processing of requests to view images, or for providing a copy.

Provision of camera images

---

3 Currently the information desk, entrance, external control room and technical area.
Recorded camera images will only be provided to the judicial authorities when a legally issued order to do so is received from a Public Prosecutor, or when another legal regulation obliges the AFH to do so.

If evidence of a criminal act is present in the images, the AFH may decide to report this to the police, and to voluntarily hand over the camera images to the appropriate authorities.

Private parties will not be permitted to view camera images except when they themselves are shown in them (see “Viewing and copying camera images” above).

Complaints and questions
If employees have any questions concerning the use of the CCTV system, they can put them to the security coordinator. The security coordinator is the Facility Services manager.
Complaints concerning the use of the CCTV system and/or the behaviour of the employees concerned can be submitted to the Human Resources department.
The Human Resources department will issue a written reply, accompanied by reasons, within a maximum of four weeks of the complaint being received.
The management board of the Anne Frank House will decide on cases not covered by these regulations.