

## POLICY

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**Series:** Board Governance **COA: GOV 2, GOV 6; HR 1, HR 5; ETH 2; RPM 2**  
**CFOP:**

**Policy Name:** Nepotism  
**Policy Number:** GOV013  
**Revision #/Date:** 11/2008, 8/25/2016, 4/22/2021, 3/21/2022  
**Reviewed Date:** 01/21/2013, 01/31/2020, 4/20/2021, 3/24/2022  
**Effective Date:** 09/2007

**Applicable to:** Brevard Family Partnership Family of Agencies (BFP FOA) Board of Directors, All BFP FOA Staff

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**PURPOSE:** To ensure that Brevard Family Partnership prohibits preferential treatment and nepotism and avoids the potential or perception of conflict of interest regarding employment decisions including hiring, training and advancement opportunities, benefits, supervision, disciplinary action, and promotion regarding family members.

**References:** HR 2214 – Nepotism, HR 2502 Conflict of Interest, GOV002 Conflict of Interest

**POLICY:**

Brevard Family Partnership and its Family of Agencies (BFP FOA) work to create a positive and productive work environment for all employees. Consequently, there may be opportunities when family members of current employees wish to submit an application for open positions within the BFP FOA. The agency strives to balance the needs of BFP with making sound business decisions that will avoid the potential of preferential treatment, the perception of preferential treatment, and/or the potential for conflict of interest.

Regarding the employment of qualified relatives of current employees who are family members, the agency has developed specific criteria to both accommodate qualified family members joining the organization while ensuring that the agency exercises sound business judgment in the placement of related employees to avoid the potential for favoritism or a conflict of interest.

For the purposes of this policy, “qualified relatives,” of employees of family members is defined to include a spouse, partner, child, parent, sibling, aunt, uncle, significant other, grand-relation, first cousin, in-law, or step relationship.

The family members of the BFP FOA Chief Executive Officer, the BFP FOA Board of Directors and Director level and above employees may be, at the discretion of the agency, prohibited from employment at Brevard Family Partnership due to the potential for conflict of interest. BFP FOA Board members are prohibited from employment with BFP FOA. Exceptions to this rule may include “Qualified Relatives.”

“Qualified relatives” of Director and above staff members applying for employment with BFP FOA will undergo the current administrative application and interview process, and if it is determined the “qualified relative” is the most suitable applicant, provisions will be made to ensure there is no conflict in the reporting hierarchy. This may include the use of a third party such as a peer or other

management staff who will assume the responsibility for the day-to-day supervision of the “qualified relative’s” work if the individual is placed in a position within the chain of command.

Therefore, in certain circumstances, Brevard Family Partnership FOA may employ “qualified relatives” but limits the positions and reporting relationships that may be permitted. “Qualified relatives” will not be employed:

- In a direct or indirect reporting relationship; or
- In positions where sensitive information or cash activities could create a potential for a conflict- of- interest situation; or
- Where one member audits, verifies, receives, or is entrusted with funds handled by the other family member; or
- Where one relative’s work responsibilities, salary or career progress could be influenced by another relative.

“Qualified relatives” may also be prohibited from working in the same division or in specific positions where the agency believes an inherent conflict-of-interest may exist.

As Brevard Family Partnership is strongly committed to the prevention of any form of harassment in the workplace, any close personal relationship between a supervisor and an employee is prohibited. Staff with supervisory authority shall not establish a dating relationship with their employees. In the event where a current employee and supervisor establish a relationship covered under this procedure, the agency will review the situation and determine the appropriate course of action.

In the event that current employees become involved in a relationship that is covered in this policy as a “qualified relative” or “family member,” it is understood that if a relationship results in violating this policy the agency will review the situation and determine the appropriate course of action. This may result in one of the employees being transferred to an open position for which they are qualified, or it may result in one of the staff members choosing to sever the employment relationship with BFP FOA.

Approved by the Brevard Family Partnership Board of Directors on March 24,2022.

AS APPROVED BY THE BOARD OF DIRECTORS:



RUTH LONG  
Board Chair

Signature Date: 4/14/2022

BY DIRECTION OF THE CHIEF EXECUTIVE OFFICER:



PHILIP J. SCARPELLI  
President and Chief Executive Officer

Signature Date: 4/14/2022