

PROCEDURE

Series: HR Work Environment **COA:** HR 1.03 ETH 2

CFOP:

Procedure Name: Nepotism
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Effective Date: 9/2004

Applicable to: All Family Partnerships of Central Florida (FPOCF) Staff

PURPOSE: To ensure that the agency 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.

Ref: GOV 013 Nepotism

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Family Partnerships of Central Florida have created a positive and productive work environment for all employees. Consequently, there may be opportunities when family members of current employees wish to apply for open positions within the agency. The agency strives to balance the needs of the agency by 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 currently employed family members the agency has developed specific criteria to both accommodate qualified relatives joining the organization while ensuring that the agency exercises sound business judgment in the placement of related employees to avoid the potential for favoritism and/or a conflict of interest.

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

The family members of the President and Chief Executive Officer, the Board of Directors and director level and above employees may be, at the discretion of the Executive team of FPOCF, prohibited from employment at FPOCF due to the potential for conflict of interest. Board members are also prohibited from employment with the FPOCF. Exceptions to this rule may include “Qualified Relatives.”

Qualified relatives of director level staff members and below applying for employment with FPOCF are permitted to undergo the current administrative application and interview process and if it is determined the “qualified relative” is the most suitable applicant, provisions are made to ensure there is no conflict of interest 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 relatives" work if the individual is placed in a position within the chain of command.

Therefore, in certain circumstances, FPOCF may employ qualified relatives but limit the positions and reporting relationships. Qualified relatives will not be employed:

- In a direct or indirect reporting relationship; or
- Where both individuals report to the same supervisor or manager; or
- In positions where sensitive information or cash activities could create a potential for a conflict-of-interest situation; or
- Where one 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 FPOCF 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 procedure, the employees must immediately and fully disclose the relevant circumstances to their supervisor or another management member so that a determination can be made as to whether the relationship presents an actual or potential conflict of interest. It is understood that if those relationships result in violating this procedure, FPOCF 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 the agency.

BY DIRECTION OF THE PRESIDENT AND
CHIEF EXECUTIVE OFFICER:



PHILIP J. SCARPELLI
President and Chief Executive Officer
Family Partnerships of Central Florida

APPROVAL DATE: 10/29/2025