These procedures are developed in conjunction with Policy A6Hx2-1.15, Standard of Ethics and Professionalism for Public Officers and Employees of Agencies and are created to provide a mechanism for implementing said policy. The College is committed to the highest standards of excellence and professionalism as an institution that upholds the public trust.

**Filing Claims and Reporting Violations:**

**Ethics:**
When an employee or officer of the College feels they may have a conflict of interest as defined in Policy 6Hx2-1.15, the employee is responsible to identify the situation which may violate the policy prior to acceptance of the gift, business opportunity, compensation, employment, contract or office as defined by the policy and Florida Statute. These issues will be reviewed by the Director of Compliance in the Division of Human Resources and Equity. Failure to report such situations or reports of violation of the policy will be investigated by the Director of Compliance in the Division of Human Resources and Equity and any act of fraud, or other illegal act verified by internal or external investigation, (including the course of routine audits) or pursuant to a criminal conviction, or through written acknowledgment by the employee(s) concerned, may result in consideration of disciplinary action up to and including termination.

- For non-represented employees, action will be taken pursuant to the terms and conditions of the relevant employment contract, if applicable.

- For full-time Faculty, refer to the Collective Bargaining Agreement between The Board of Trustees of Broward Community College and United Faculty of Florida, Broward Community College Chapter, Article 2.33.

- For represented professional technical staff, refer to the Collective Bargaining Agreement between the Board of Trustees of Broward Community College and Federation of Public Employees, Article 2.

**Conduct:**
In compliance with Board Policy 6Hx2-1.15, Code of Ethics, any employee, who believes that they have been subjected to conduct as defined in and in violation of the College’s policies may file a complaint in accordance with College policies 6Hx2-3.34, Discrimination, Harassment and Retaliation, 6Hx2-3.31, Sexual and Other Unlawful Harassment, 6Hx2-3.40, Workplace Violence, or 6Hx2-3.28, and/or Filing of Complaints for Administrative and Non-Represented Professional Technical Staff. The Division of Human Resources and Equity will facilitate investigations into complaints in accordance with the above policies.
Grant or Contract Project Directors

Individuals who are grant or contract project directors and subcontractors are required to disclose all relevant financial interests to Broward College through a Financial Disclosure Form. All individuals who are required to complete this form should submit it to the Grants Office of the Broward College Foundation for review. The Grants Office will review the form for any relevant financial conflict of interest. After review by the Director of Compliance in the Division of Human Resources and Equity, a copy of the form will be placed in the employee’s personnel file.

If a conflict of interest exists, prior to any expenditure of awarded funds, the College must report any conflicts to the funding source and act to protect the project from bias due to the conflict of interest. Actions may include:

1. public disclosure of significant financial interests,
2. monitoring of project activities by independent reviewers,
3. modification of the activity plan,
4. disqualification from participation in all or a portion of the funded activities,
5. divestiture of significant financial interests, or
6. severance of relationships that create actual or potential conflicts.

Disclosure information must be updated annually, or more frequently as needed, if project personnel acquire any new, relevant financial interests.