

OP202 Code of Ethics

Effective Date: 08/05/09

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The Coalition's Code of Ethics (also known as a Code of Conduct) is a compilation of what business conduct is expected from all of its employees and board members as it pertains to (but not limited to) each of four aspects of the Coalition's business processes: Personnel, Accounting and Financial, Procurement of Goods or Services, and Contract Management and Monitoring. Upon hire, acceptance, or assignment, each individual is required to read the Coalition's Code of Ethics and sign the Coalition's Code of Ethics Acknowledgment of Compliance form, and then annually for each subsequent year of employment or affiliation.

The following are a few generalized examples of infractions of rules of conduct that may result in disciplinary action, up to and including termination of employment or board assignment:

- Theft or inappropriate removal or possession of property
- Contributing to the misrepresentation or falsification of documents
- Altering, covering up, falsifying, or destroying any document that may be relevant to an official investigation
- Insubordination or other disrespectful conduct
- Unauthorized disclosure of confidential information
- Unsatisfactory performance or conduct

More specific examples of misconduct and/or unethical behavior are discussed in the following four areas of key operations.

Personnel

The successful business operation and reputation of the Coalition is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of the Coalition is dependent upon our clients' trust and we are dedicated to preserving that trust. Employees owe a duty to the Coalition, its clients, and Board representatives to act in a way that will merit the continued trust and confidence of the public.

The Coalition will comply with all applicable laws and regulations and expects its Board of Directors, C.E.O., managers, supervisors, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your immediate supervisor.

Compliance with this policy of business ethics and code of conduct is the responsibility of every Coalition employee. Disregarding or failing to comply with this standard of business ethics and code of conduct could lead to disciplinary action, up to and including possible termination of employment.

Accounting and Financial

Practice of Ethical Behavior

Unethical actions, or the appearance of unethical actions, are unacceptable under any conditions. The policies and reputation of Coalition depend to a very large extent on the following considerations.

Each employee must apply her/his own sense of personal ethics, which should extend beyond compliance with applicable laws and regulations in business situations, to govern behavior where no existing regulation provides a guideline. Each employee is responsible for applying common sense in business decisions where specific rules do not provide all the answers.

In determining compliance with this standard in specific situations, employees should ask themselves the following questions:

1. Is my action legal?
2. Is my action ethical?
3. Does my action comply with Coalition policy?
4. Am I sure my action does not appear inappropriate?
5. Am I sure that I would not be embarrassed or compromised if my action became known within the Coalition or publicly?
6. Am I sure that my action meets my personal code of ethics and behavior?
7. Would I feel comfortable defending my actions on the 6 o'clock news?

Each employee should be able to answer "yes" to all of these questions before taking action.

Each board member and C.E.O. is responsible for the ethical business behavior of her/his subordinates; and must carefully weigh all courses of action suggested in ethical, as well as economic, terms and base their final decisions on the guidelines provided by this policy, as well as their personal sense of right and wrong.

To the extent that the C.E.O. authorizes other managers to perform certain activities, those managers become responsible for those portions of the organization's system of internal control, and at no time is Coalition management allowed to override an Internal Control process.

Compliance with Laws, Regulations, and the Coalition Policies

The Coalition does not tolerate:

- The willful violation or circumvention of any federal, state, local, or foreign law by an employee during the course of that person's employment;
- The disregard or circumvention of the Coalition policy or engagement in unscrupulous dealings.
- Any attempt of management to override a financial internal control process.

Employees should not attempt to accomplish by indirect means, through agents or intermediaries, that which is directly forbidden.

The performance of all levels of employees will be measured against implementation of the provisions of these standards.

Legal Action

In the event that legal services are required for active or pending litigation, the Board of Directors must be notified in advance and approval for such action granted. This notification should include, at a minimum, a description of the services to be rendered, anticipated fees, and allowability of the expense in regards to the use of grant award funds.

Procurement of Goods or Services

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Employees and board members should strive at all times to make decisions and take actions that make concrete contributions to the professional, financial and organizational welfare of the Early Learning Coalition and its counties and communities.

Receiving Business Gifts

Employees and board members are expected to be professional about receiving gifts from clients, providers, vendors, suppliers, and other organizations the Coalition directly or indirectly conducts business with. This includes the purchase of business related meals and after work refreshments.

Contract Management and Monitoring

Coalition Ethics

1. Staff members are prohibited by Chapter 112, Part III, F.S., from soliciting or accepting anything of value that would cause them to be influenced in the discharge of their responsibilities.
2. Examples of ethics violations include, but are not limited to the following:
 - (a) Deliberately failing to disclose a conflict of interest in the course of one's duties.
 - (b) Engaging in or carrying on a business enterprise with a client or person doing business with the Coalition.
 - (c) Accepting or requesting gifts or gratuities from contractors, providers, or clients in violation of the Coalition's Code of Ethics.
3. Staff members are prohibited from revealing client names or other confidential information from the Coalition or contractors records to unauthorized persons. Examples include releasing HIV/AIDS client names or reporter information from the Florida Protective Services System.
4. Staff members are expected to conduct themselves in a manner that favorably reflects upon the Coalition, and themselves.

**CODE OF ETHICS
ACKNOWLEDGEMENT OF COMPLIANCE FORM**

This form must be completed, signed, and submitted for each Coalition board member, and employee upon hire, acceptance, or assignment.

This acknowledgement form is submitted by _____,
a Coalition board member or employee of the Early Learning Coalition of North Florida, Inc.

By signing below, I certify that I have read, understood, and agree to be (and remain) in compliance with all of the provisions of the **Coalition's Operational Code of Ethics Policy #OP202**.

Name (printed)

Position with the Coalition (board member or employee)

Signature

Date