**Introduction**

The Office of Compliance and Ethics (the “Compliance Office”) provides centralized oversight for the University of West Florida’s (“UWF” or the “University”) compliance activities. The Compliance Office seeks to promote and implement a university-wide compliance and ethics Program as a point for coordination of and responsibility for activities that promote ethical conduct and maximize compliance with applicable laws, regulations, rules, policies, and procedures. The Compliance Office will accomplish these goals through the establishment and continuous appraisal of effective policies and procedures, education and training, communication, monitoring, reporting, and risk-reduction activities.

**Mission**

Establish and maintain a centralized compliance and ethics function that promotes a university-wide culture of compliance, integrity, and ethical conduct.

**Scope of Work**

Fulfill the requirements of Florida Board of Governors Regulation 4.003, State University System Compliance and Ethics Programs, and Chapter 8 §8B2.1, Effective Compliance and Ethics Program, of the U.S. Federal Sentencing Guidelines. The Compliance Office will operate consistent with the Code of Ethics for Public Officers and Employees contained in Part III, Chapter 112, Florida Statutes and other applicable codes of ethics in fulfilling their mission to optimize its effectiveness in preventing or detecting non-compliance, unethical behavior, and criminal conduct.

**Organization, Independence, and Authority**

The UWF Board of Trustees Audit & Compliance Committee and the University President approve the appointment, reassignment, replacement, or dismissal of the Chief Compliance Officer (“CCO”) to ensure the administration of a comprehensive Compliance and Ethics Program for UWF. The Chief Compliance Officer will report functionally to the Audit & Compliance Committee of the Board of Trustees and administratively to the University President in accordance with the Florida Board of Governors Regulation 4.003.

The Compliance Office is authorized full and unrestricted access to the extent provided by law to all University areas, activities, records, property, information sources, and personnel, including those records or activities exempt from the Public Records laws, as required to fulfill its responsibilities. Any documents and information obtained by the Compliance Office are handled in the same prudent manner as by those employees normally accountable for them.

The Compliance Office is responsible for effective coordination with the Florida Board of Governors Office of the Inspector General and the State University System Compliance and Ethics Consortium. The Compliance Office may also provide compliance services to University Direct Support Organizations and entities under the control and direction of UWF at the request of management or the Board of Trustees.

**Professional Standards**

The Compliance Office will govern itself by adherence to the Florida Code of Ethics for Public Officers and Employees, and the Society of Corporate Compliance and Ethics’ Code of Professional Ethics for Compliance and Ethics Professionals. The Compliance Office shall comply with all federal and state laws, the Florida Board of Governors’ Regulations, the University of West Florida Regulations and Policies.

The Compliance Office has a responsibility to the interests of those they serve and should refrain from entering into any activity that may create a conflict of interest. Compliance Office staff members have an obligation of self-discipline that go beyond the fundamental requirements of laws and regulations. Staff members should uphold and demonstrate qualities of integrity, honesty, morality, dignity, and confidentiality consistent with professional standards. The Society for Corporate Compliance and Ethics, Florida Board of Governor’s Regulation 4.003, State University System Compliance and Ethics Programs, and Chapter 8 §8B2.1 of the U.S. Federal Sentencing Guidelines shall constitute the operating procedures of the Compliance Office.

**Duties and Responsibilities**

The Compliance Office has primary responsibility for developing and implementing programs that support a system-wide culture of ethical conduct and compliance with all laws, regulations, and University policies. Compliance Office personnel shall:

* Monitor and promote University compliance with federal and state requirements, as well as all applicable policies, procedures, rules and regulations.
* Inform, train, and educate the University community in compliance matters, policies, procedures, ethical obligations, and Standards of Conduct.
* Manage, maintain, and operate the University’s Compliance Database.
* Facilitate and promote a culture of compliance at the University.
* Participate in periodic risk assessments.
* Develop a program plan based on the accepted requirements for an effective compliance program.
* Provide oversight and assistance for compliance activities across the UWF community by serving as an institutional resource for compliance matters.
* Annually report on the effectiveness of the UWF Compliance Program. This report shall require BOT approval and a copy will be sent to the Florida Board of Governors Office of Inspector General.
* Obtain an external review of the Compliance and Ethics Program at least every five years.
* Manage oversight and awareness campaigns for the UWF Integrity Helpline.

The Office of Compliance and Ethics is responsible for performing its duties with due professional care, including having the appropriate education, certification, experience, professionalism, personal integrity, and attitude of service, while producing relevant, timely, and quality work.

Dr. Martha Saunders Mort O’Sullivan Bob Jones

President UWF BOT Trustees, Chair BOT Audit and Compliance Committee

Approved: May 24, 2018