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Lansing Housing Commission  
Policy 2011-2  
Code of Conduct

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This Code of Conduct represents guiding principles only, it cannot anticipate all circumstances and situations that employees may encounter. It is designed to provide Lansing Housing Commission (“LHC”) employees and Board of Commissioners with a clear understanding of LHC’s Code of Conduct. The exercise of good judgment is still expected at all times.

LHC does not condone the activities of employees and board of Commissioners who achieve results through violation of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates, and bribery. We do not permit any activity that fails to stand the closest possible scrutiny.

Employees and Board Commissioners who are uncertain about the application or interpretation of any legal requirements pertaining to this Code of Conduct should refer the matter to either their Supervisor, the Director of Human Resources or the Executive Director, who, if necessary will seek appropriate legal advice.

LHC expects its employees and Board of Commissioners to conduct themselves in a businesslike manner. Drinking, gambling, fighting, swearing, and similar unprofessional activities are strictly prohibited while on the job and whenever representing the Commission.

**Responsibility and Authority**

All members of management are responsible for implementing and enforcing the Employee Code of Conduct in consultation with the Human Resources department. On an annual basis, employees are required to sign an acknowledgement that they have read, understood, and agree to comply with the Employee Code of Conduct.

If an employee or Board of Commissioner becomes aware of a serious breach of this Code of Conduct, they are responsible for reporting that breach to their Supervisor, the Director of Human Resources or the Executive Director. Any employee who reports a breach in good faith is protected from reprisal for doing so, even if the reported breach is not confirmed through investigation.

**Funds and Other Assets**

Employees and Board of Commissioners who have access to Organizational funds in any form must follow the prescribed procedures for recording, handling, and protecting money as detailed in the LHC’s policies and procedures or other explanatory materials, or both. LHC imposes strict standards to prevent fraud and dishonesty.

If employees or Board of Commissioners becomes aware of any evidence of fraud and dishonesty, they should immediately advise their Supervisor, the Executive Director or seek appropriate legal guidance so LHC can promptly investigate further.

When an employee or Commissioner spends LHC funds or incurs any reimbursable personal expenses, that individual must use good judgment on LHC's, behalf to ensure good value is received for every expenditure. Organization funds and all other assets of the LHC are purposed for LHC only and not for personal benefit. This includes the personal use of organizational assets, such as computers.

### **Records and Communications**

Accurate and reliable records of many kinds are necessary to meet the LHC's legal and financial obligations and to manage LHC's affairs. The books and records must reflect in an accurate and timely manner all business transactions. The employees responsible for accounting and recordkeeping must fully disclose and record all assets, liabilities, or both, and must exercise diligence in enforcing these requirements. Employees must not make or engage in any false record or communication of any kind, whether internal or external, including but not limited to:

- False expense, attendance, production, financial, or similar reports and statements
- False advertising, deceptive marketing practices, or other misleading representations

### **Dealing with Outside People and Organizations**

Employees and Board of Commissioners must take care to separate their personal roles from their LHC role when communicating on matters not involving LHC business. Employees and Board of Commissioners must not use organization identification, stationery, supplies, and equipment for personal or political matters. When communicating publicly on matters that involve LHC business, employees and Board of Commissioners must not presume to speak for LHC on any topic, unless they are certain that the views they express are those of the Organization, and it is the Organization's desire that such views be publicly disseminated. When dealing with anyone outside of LHC, including public officials, employees and Board of Commissioners must take care not to compromise the integrity or damage the reputation of either, the Organization, or any outside individual, business, or government body.

### **Privacy and Confidentiality**

When handling financial and personal information about customer or others with whom the LHC has dealings, observe the following principles:

- Collect, use, and retain only the personal information necessary for LHC's business. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources to supplement this information.
- Retain information only for as long as necessary or as required by HUD rules and the law
- Protect the physical security of this information
- Limit internal access to personal information to those with a legitimate business reason for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.