FRONT STEPS HOUSING AND SERVICES
CODE OF ETHICS

PURPOSE: To establish procedures for management, employees, contractors and volunteer's, ethical conduct when relating to governing bodies, persons served, business clients, vendors and visitor

POLICY: Front Steps prides itself on its values, and recognizes that integrity and accountability are among the highest honors to uphold. Our principles define the organization’s basic philosophy and set the ethical tone for the institution. Therefore, the Board of Directors has adopted a Code of Ethics for Front Steps Housing and Services, Inc. The Code will guide Board members, Staff, Student, Contractors and Volunteers in their conduct when acting on behalf of Front Steps. The Code will be reviewed annually.

Vision:

Front Steps transforms lives to end the cycle of homelessness.

Mission:

Front Steps provides individuals and families who are mentally disabled and/or economically disadvantaged in Cuyahoga County with permanent supportive housing and lifelong solutions to increase self-sufficiency and independence.

Our Guiding Principles and Values:

- We believe that all individuals, no matter what their backgrounds or life circumstances, have the right to safe, affordable housing.
- We believe in the human potential to make positive choices, productive life changes and valuable contributions to the community.
- We aspire to have a deep awareness of the physical, psychological and spiritual needs of all people. We value the community’s diversity and treat all individuals with compassion and respect.
- In our commitment to social justice, we believe in the value of advocating for individual opportunity and systemic change in our society.
- We are committed to ensuring the highest quality housing, services and management.
- We are committed to conducting all aspects of our business with integrity and accountability.
- We believe in collaborations and partnerships with community stakeholders to further enhance our work for clients.
I. Communication of Information

A. Confidential Information

The Board members, staff, student interns, contractors and volunteers shall maintain the confidentiality of Confidential Information of Front Steps or that of any customer, supplier or business associate of Front Steps to which Front Steps has a duty to maintain confidentiality, except when disclosure is authorized or legally mandated. Confidential Information includes all non-public information that might be of use to competitors or harmful to Front Steps or its customers, suppliers, or business associates.

Front Steps confidential and proprietary information shall not be inappropriately disclosed or used for the personal gain or advantage of any Board member, staff, student interns, contractors and volunteers or any other person or entity.

B. Business Ethics

The success of our business ethics is dependent on the trust and confidence we earn from our employees, customers and stakeholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching Front Steps goals solely through honorable conduct. Front Steps will follow procedures that enhance the overall quality of its financial reporting and operational effectiveness. All conduct should be in compliance with the standards required by law, this Code and the Front Steps Code of Regulations. Accordingly, its Board members and employees must ensure that their actions cannot be interpreted as being unethical.

C. Marketing

Misrepresentation of services or products to or for persons served or business customers will not be tolerated. Front Steps is aware of the trust placed in us to provide precise information at all times. The marketing of services to the general public, funding agencies, and people with disabilities must be appropriately and accurately represented.

D. Contractual Relationships:

Front Steps may contract with qualified individuals for the purpose of developing and/or maintaining a full array of services to foster continuity of care. Contractors of Front Steps must conduct themselves in a manner consistent with the standards set forth in this Code.
II. **Service delivery:**

Front Steps will provide all services in a manner that demonstrates the utmost respect for the humanity and dignity of each person served. We will provide competent, caring service/support to each individual consistent with Front Steps person-centered philosophy. It is our responsibility to protect all persons served from abuse, neglect, exploitation, humiliation or retaliation and provide the individuals served and/or their guardians with the information they need to make informed decisions about their services. All Front Steps board of directors, staff, student interns, contractors and volunteers will communicate with persons served in a manner that is respectful and best helps them understand the information being presented. We will protect the confidentiality of all information related to persons served and recommend only those services considered to be beneficial as identified by the persons served.

III. **Conflicts of interest**

Front Steps recognizes that the potential for conflicts of interest exists for decision-makers at all levels. Front Steps will not participate in activities that could create potential conflicts of interest; this includes Directors, who are also bound by the Conflict of Interest provisions set forth in Article X of our Code of Regulations, staff, student interns, contractors and volunteers. All Front Steps staff, student interns, contractors and volunteers should conduct themselves in such a way as to promote a positive public image of Front Steps and to avoid any possible claims of unprofessional conduct or conflict of interest. As a result, all officially sponsored Front Steps fundraising activities are specifically excluded from this provision. Also excluded are donations made by clients, estates of deceased clients, corporations, or other entities that desire to contribute to the furtherance of the mission of Front Steps.

Front Steps expects that employees will perform their duties conscientiously, honestly, and in accordance with the best interests of Front Steps. Employees must not use their positions or the knowledge gained as a result of their positions for private or personal advantage. Regardless of the circumstances, if employees sense that a course of action they have pursued, or are presently pursuing, or are contemplating pursuing may involve them in a conflict of interest with their employer, they should immediately communicate all the facts to their supervisor.

IV. **Exchange of Gifts, Money and or Gratuities**

Front Steps Directors, staff, student interns, contractors and volunteers cannot accept personal favors, gifts, or gratuities under any circumstances which may be reasonably construed as influencing the management and/or employees/contractors official activities. Receiving money or realizing personal financial gain from business, industries, or other community stakeholders with which Front Steps conducts business or which is under consideration for a business transaction is not permitted. The offer/and or acceptance of any questionable benefit must be reported to the Compliance Officer immediately.
i. **Gifts**

No individual shall accept gifts, favors, entertainment, or other items of value that may compromise his or her decision-making abilities or result in negative influence being exerted on Front Steps. The offer/and or acceptance of any questionable benefit must be reported to the Compliance Officer immediately.

ii. **Money**

The offer by any Front Steps employee of money, services or other items of value with the expectation of influencing the judgment, integrity, or decision-making ability of any client, visitor, governmental official or other person having business dealings with Front Steps is expressly prohibited. The request for, or knowledge of, provisions of such benefit must be reported immediately. Excluded from this provision are gifts or donations that are made to Front Steps in furtherance of its defined mission. As a result, all officially sponsored Front Steps fundraising activities are specifically excluded from this provision. Also excluded are donations made by clients, estates of deceased clients, corporations, or other entities that desire to contribute to the furtherance of the mission of Front Steps.

iii. **Gratuities**

Employees must not accept entertainment, or personal favors that could, in any way influence, or appear to influence, business decisions in favor of any person or organization with whom or with which the Organization has, or is reasonably likely to have, business dealings. Similarly, employees must not accept any other preferential treatment under these circumstances because their positions with the Organization might be inclined to, or be perceived to, place them under obligation to return the preferential treatment.

iv. **Kickbacks and Secret Commissions**

Regarding Front Steps business activities, employees may not receive payment or compensation of any kind, except as authorized under Front Steps business and payroll policies. In particular, Front Steps strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others. Any breach of this rule will result in immediate termination and prosecution to the fullest extent of the law.
V. **Personal Fundraising**
No Director, staff, student interns, contractors and volunteers of Front Steps shall fundraise for personal gain or interest.

VI. **Company Funds**
Officers and employees of Front Steps are responsible for safeguarding corporate assets and resources to which they are entrusted. Financial assets may never be used for personal benefit. Other resources may be disposed of only with Board approval. Corporate cash, checks, money orders, and credit cards must never be used for personal purposes. Vouchers or other documents used to obtain corporate funds or property must be accurate and complete so as to prevent improper, potentially fraudulent, acquisition of corporate assets. Appropriate record keeping practices must be followed in regard to the use of all such assets and resources.

VII. **Personal and Intellectual Property**
In Front Step’s dynamic environment, programs may be developed by staff, student interns, contractors and volunteers as part of their Front Steps position or placement. These materials (e.g., logos, Websites, presentations, brochures, curricula, displays, grants, program designs, manuals etc.) and any funding related to these programs are the property of Front Steps and not the person who is developing the materials. Staff, student interns, contractors and volunteers as part of their Front Steps position or placement should disclose any potential conflict in this area at the time of hire or placement.

All Front Steps Directors, staff, student interns, contractors and volunteers that develop programs shall use their best efforts to respect and safeguard the personal property of persons served, visitors, co-workers and property owned by Front Steps.

VIII. **Setting boundaries**
The interactions and relationships between staff members and clients should be based upon mutual respect and trust, an understanding of the appropriate boundaries between employee and client in and outside of the work setting, and consistency with the mission of the organization. Clients are to be treated with respect and dignity. Staff will not be involved in friendships, intimate relationships, or show favoritism toward clients because such behaviors constitute boundary violations that are detrimental to treatment objectivity and a positive rehabilitation environment. Employees are to adhere to the Staff/Clien Relationship Policy.
IX. **Witnessing of documents**

Employees may not witness a resident’s documents that are external to the Corporation such as those relating to Divorce or Bankruptcy proceedings. Residents requiring such services will, when appropriate, be referred to an appropriate legal service agency or a Notary Public. However, residents [filing Motions to Seal Criminal Records to be filed] [preparing documents] with the assistance of Front Steps may have relevant documents witnessed and notarized by a Front Steps employee who is a Notary Public.

X. **Professional Responsibilities**

All employees share responsibility for Front Steps good public relations, especially at the community level. Their readiness to help with religious, charitable, educational, and civic activities brings credit to Front Steps and is encouraged. Employees must, however, avoid acquiring any business interest or participating in any other activity outside the Corporation that would, or would appear to:

1. Create an excessive demand upon their time and attention, thus depriving the Organization of their best efforts on the job.
2. Create a conflict of interest- an obligation, interest, or distraction-that may interfere with the independent exercise of judgment of Front Steps best interest.
3. Allow employees/contractors to buy, sell, borrow, or lend goods or money with, for, or to persons served, stakeholders, business partners, or potential business partners.

All employees of Front Steps in positions that require professional licensure must adhere to the appropriate and applicable code of ethics established by their respective licensing board. All non-license program employees must adhere to either; the Code of Professional Conduct for Case Managers, or the National Association of Social Worker Code of Ethics.

XI. **No Retaliation Policy**

Front Steps will not tolerate any form of retaliation or reprisal against anyone making a good faith report of a potential violation of this Code of Ethics, the Corporation’s Articles of Incorporation, its Code of Regulations or other corporate policy. It is the responsibility of each Director, the Executive Director, all staff members, student interns and volunteers to act in accordance with this Code of Ethics. This obligation includes the use of best efforts to assure similar conduct by Front Steps vendors and affiliates.

To assure that reprisal is not used, the Corporation’s governance authorities will act as advocates for any employee who reports questionable practices. The Corporate Compliance Officer will provide assurance and oversight to assure that there are no adverse actions toward the employee.
XII. **Harassment Free Workplace**

Harassment takes many forms ranging from overt advances or inappropriate touching, to demeaning comments, jokes, language and gestures. Even if not intended to harass, such behavior may be perceived as harassment. It is, therefore, important for all to be sensitive to how others may perceive such behavior.

Whenever words, behaviors, or actions create an intimidating, hostile or offensive workplace environment, it may be considered harassment. Such conduct, even absent a direct threat, can be destructive of a positive workplace environment.

If an unwarranted sexual advance is made and reported, one’s job, evaluation, pay or work assignments are not threatened because such an advance was rejected. Consistent with the No Retaliation Policy set forth above, there is to be no retaliation or reprisal for such rejection or for the reporting of harassment in any of its forms.

XIII. **Outside Employment:**

Any Front Steps employee seeking employment in addition to his or her work with Front Steps, must notify the appropriate supervisor and the Executive Director in writing.

Outside employment must not conflict with the need for high standards of conduct connected with employment with Front Steps.

Employees may not be concurrently employed by any organization, agency, institution or other entity that provides funding to or contracts with Front Steps. This prohibition extends to any organization, agency institution or other entity which fulfills a planning function or having a direct effect on Front Steps, or any such organization that provides a similar service in competition with Front Steps, without express prior authorization of the Executive Director.

XIV. **Human Resources**

Front Steps is committed to equal opportunity rights for all persons. Front Steps accords unbiased and equal treatment to all persons regardless of race, color, creed, sex, national origin, age, disability, or sexual orientation. Front Steps adheres to the Equal Opportunity Employment policy set forth in its employee handbook. Front Steps makes use of varied community resources to assist in recruiting personnel, such as the placement of job opportunity listings with daily newspapers, congregation bulletins, and newspapers reaching the largest number of minority readers. Job listings must state that Front Steps is an Equal Opportunity. The Front Steps Office Manager shall maintain current personnel records as required to meet State, Federal and local managing authority responsibilities.
XV. **Advocacy**

Front Steps will advocate with the people we support for justice, inclusion and full community participation. Front Steps will:

- Support individuals to speak for themselves in all matters where assistance is needed.
- Represent the best interest of people who cannot speak for themselves by finding alternative ways of understanding their needs, including gathering information from others who represent their best interests.
- Advocate, educate and create awareness among legislators and the general public for support of laws and policies that promote justice and inclusion for persons with disabilities and other groups who have been disempowered. Such efforts will be made in a manner consistent with Article IX of the Code of Regulations.
- Promote human, legal and civil rights of all people and assist others to understand these rights.
- Recognize that those who victimize people with disabilities either criminally or civilly must be held accountable for their actions.
- Find additional advocacy services when services we provide are not sufficient.
- Consult with professionals with necessary expertise when we are unsure of the appropriate course of action in our advocacy efforts.

XVI. **Addressing reports of allegations of fraud, waste and abuse:**

Front Steps Administration, consisting of its Board of Directors and Executive Director, is primarily responsible for the effectiveness and efficiency of corporate operations, including the protection of its assets from fraud, waste, and abuse. The Administration has the primary responsibility for the implementation of internal controls to deter and detect fraud and prohibits fraud, waste and abuse.

Reports of allegations of violations of this policy will result in a thorough investigation conducted by the Corporate Compliance Officer. An employee found to have violated the policy will be subject to corrective action. In instances where allegations of fraud, waste and abuse has been reported, Front Steps will review and analyze all past records for issues and trends to assure the appropriate corrective action is implemented.

Any Front Steps employee who has knowledge of fraud, waste, or abuse, or who has good reason to suspect that such conduct has occurred, shall adhere to the procedures in the Corporate Compliance Plan. The Corporate Compliance Plan documents the procedures to take when reporting an issue. Front Steps shall take all reasonable steps to respond appropriately to allegations of fraud, waste or abuse and to prevent future wrongdoing.
Front Steps uses the following terminology to define:

a) **FRAUD** – Any intentional deception designed to unlawfully deprive the agency of something of value or to secure from Front Steps for personal benefit privilege, allowance, or consideration to which he or she is not entitled.

b) **WASTE** – The extravagant, careless or needless expenditure of agency funds, incurring of unnecessary expenses, mismanagement of agency resources or property or the consumption of agency property that results from deficient practices, systems, controls or decisions.

c) **ABUSE** – Intentional, wrongful, or improper use or destruction of agency resources. Abuse can include the excessive or improper use of an employee or official’s position in a manner other than its rightful or legal use.

XVII. **Procedures for resolving allegations of Ethical violations:**

To the extent that these Procedures or the terms of Article XVI of this Code of Ethics conflict with Article X "Conflicts of Interest" set forth in Front Steps Code of Regulations, the provisions of the Code of Regulations shall govern.

Please refer to the Policy and Procedure #101.9 in the Leadership Section of the Operations Manual for resolving allegations of ethical violations.

XVIII. **Compliance, Monitoring and Reporting**

Front Steps leadership is responsible for communicating this Code of Ethics to all members of the board of directors, as well as staff, contractors, student interns and volunteers and for ensuring its adherence at all times.

XIX. **Annual Review and Amendment**

The Code of Ethics will be reviewed annually by the Executive Director and the Program Evaluation and Planning Committee. The committee will then advise the Board that no amendments are necessary or request Board approval of any necessary amendments to this Code.

(Ratified by the Front Steps Board of Directors on May ____________, 2015.)
Front Steps Housing and Services

CODE OF ETHICS – DISCLOSURE FORM

This form must be completed by all members of the board of directors, staff, contractors, student interns and volunteers upon their joining Front Steps.

The undersigned, by his or her affixed signature, accepts and agrees to abide by the Front Steps Code of Ethics.

__________________________________________
Signature

__________________________________________
Printed Name

__________________________________________
Position within the organization (e.g. board member, staff, contractor, student intern, volunteer,)

__________________________________________
Date

(Ratified by the Front Steps Board of Directors on May ________, 2015)