



STEADFAST HOUSING DEVELOPMENT CORPORATION

DBA STEADFAST PACIFIC

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CODE OF ETHICS

INTRODUCTION

Steadfast Housing Development Corporation's (SHDC) DBA: Steadfast Pacific Corporation Code of Ethics includes an expansive array of ethical responsibilities that are standards for SHDC employees.

The Code of Ethics includes ethics/ areas that address:

- Business
- Marketing
- Contractual Relationships
- Service Delivery
- Professional Responsibilities
- Human Resources
- Organizational Fundraising
- Prohibition of Waste, Fraud, Abuse, and other Wrongdoing
- Written Procedures on Allegations of Violations of Ethical Codes
- Education of Personnel and Other Stakeholders on Ethical Codes
- Advocacy Efforts
- Corporate Citizenship
- Conflicts of Interest
- Policy on Media Relations & Social Media

INPUT PROCESS/REFERENCES

The Code of Ethics is updated and/or reviewed annually with input from the management team; CARF Employment and Community Services Standards Manuals; CARF Survey Reports and staff member reviews.

Agency Mission, Goal, and Philosophy

Mission “To empower and support individuals and families with disabilities on their road to recovery.”

Goal

To develop strategies for and reducing stigma and discrimination against individuals and families challenged by mental and physical disabilities, including substance abuse, persons who are homeless or on the verge of becoming homeless; and persons and families of very low and low incomes.

Philosophy

SHDC's services are guided by a person centered philosophy of recovery and rehabilitation: persons with disabilities need skills and environmental supports to achieve their goals and fulfill the role demands of their living, learning, social and working environments. The following organizational values guide program development and service delivery:

- We exist as an organization to assure that individuals and families reach the highest level of functioning and the best quality of life possible for them.
- We ensure that Consumers are always our first priority.
- We focus on Consumer strengths and incorporate the principles of person-centered planning throughout each of our programs and services.
- We encourage involvement of families in treatment.
- We celebrate diversity and respect cultural differences.
- We involve Consumers and family members in the review and evaluation of our programs and services
- We acknowledge and support our staff as our most valuable asset.

Business Practices

1. Employees shall behave in a manner that demonstrates dignity and respect to persons served, staff members, visitors, volunteers, and other stakeholders.
2. Employees must present and maintain a professional decorum with contract agents, their employees, or other associated or third party relations.
3. Employees must be honest and forthright in their communication, and communication about, any relationship, including dating, with any persons served; SHDC personnel; personnel of a funder, collaborative partner, or provider; or other business associate working directly or indirectly with SHDC.
4. Employees shall adhere to SHDC's accessibility policy in the areas of, but not limited to, facilities, environment, attitudes, finances, employment, communication, and transportation.

5. Employees shall use language that is respectful and professional when communicating with persons served, employees, volunteers, and other stakeholders.
6. Employees shall not engage in contracts or agreements with outside organizations/agencies on behalf of SHDC.
7. Employees shall behave in a trustworthy manner with those whom they serve.
8. Employees shall consult with their immediate supervisor and refer to the agency's policy when responding to subpoenas or other legal request for agency and/or consumer records.
9. Employees shall not engage in activities that fall into the category of fraud, waste, abuse, fiscal mismanagement, and/or misrepresentation of organizational funds or the funds of persons served.
10. Employees shall not act as a witness to documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts with the expressed written approval of the Executive Director.
11. Employees shall not intentionally or unintentionally mismanage the resources of the organization or other stakeholders, or persons served.

Marketing Practices

1. Employees shall behave in a manner that demonstrates dignity and respect to persons served, staff members, peer supports, visitors, volunteers, and other stakeholders.
2. Employees shall give preference to the mission of the organization over any personal, business, or marketing interest.
3. Employees should not take unfair advantage of any professional relationship or exploit others to further their personal, religious, political, business interest, or sexuality.
4. Employees shall adhere to SHDC's accessibility policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, and transportation.
5. Employees shall not use SHDC business practices, marketing strategies, or service delivery protocols for personal or professional gains outside of their specific employee role within SHDC.
6. Employees shall use language that is respectful and professional when communicating with persons served, employees, volunteers, and other stakeholders.
7. Employees shall not use any printed, audio, or visual aid materials belonging to SHDC for their personal or professional gain or benefit.

8. Any misrepresentation of SHDC's mission, purpose, goals and objectives is prohibited.
9. Employees may not represent or act as a spokesperson for SHDC unless previously authorized by the Executive Director or Board of Directors.
10. Employees shall not intentionally or unintentionally mismanage the resources of the organization or other stakeholders, or persons served.

Contractual Relationships

SHDC may contract with an individual or firm to perform specific tasks at an hourly rate or project cost. Individuals under contract are not considered employees of SHDC, and proper credentials and proof of insurance, as appropriate, are required. SHDC may request verification of licensure, certification or accreditation, and/or insurance coverage. Contractual agreements must be approved and signed by the Executive Director.

The relationship of a contractor to SHDC is that of an independent contractor and no benefits, where fringe benefits or other types of benefits, will be provided as a result of the contractual agreement.

Employees of SHDC who may work with an independent contractor are encouraged to report any suspected abuse, neglect, waste, or wrongdoing by the independent contractor to their supervisor, another Manager, and/or the Corporate Compliance Officer.

Service Delivery

1. Employees shall ensure that the organization's person-centered planning philosophy and the "people first" concept is evident in the service delivery process.
2. Employees must ensure that all barriers to accessibility are assessed, addressed, and removed.
3. Employees must have knowledge of the legal status of persons served.
4. Employees shall, when applicable, provide information to persons served regarding resources related to legal status and help link persons served to these resources.
5. Employees shall be alert to, and avoid, conflicts of interest that interfere with the exercise of professional discretion and impartial judgment.
6. Employees should inform persons served when a real, or potential, conflict of interest arises, and take reasonable steps to resolve the issue in a manner that makes the persons' served interest primary and protects the persons' served interest to the greatest extent possible.
7. Employees are prohibited from accepting money, exchanging gifts, gratuities, or other consideration from anyone other than SHDC for the performance of any act

which he/she would be required or expected to render in the regular course of his/her duties as a SHDC employee.

8. Employees shall not engage in fundraising activities that are not sanctioned and approved by the EC as permissible fundraising activities. Examples of fundraising activities that would not be under the domain of the organization may include: the selling of cookies, candy, tickets, or other items that are personal initiatives of an employee and/or is or her family member.
9. Employees, as may be appropriate in their role, shall respect and safeguard the personal property of persons served, visitors, and all property of the organization.
10. Employees are prohibited from providing services to individuals, consumer's family or friends with whom they have a personal, including dating, intimate, prior or current intimate relationship.
11. Employees shall not act as a witness to documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts with the expressed written approval of the Executive Director.
12. Employees shall recognize and respect the inherent dignity and worth of the person and persons within the persons served care system.
13. Employees' primary goals are to help people in need, address social problems, and support the well being of persons served.
14. Employees shall challenge social injustice.
15. Employees shall recognize the cultural, racial and ethnic importance of human relationships.
16. Employees shall behave in a trustworthy manner with those whom they serve.
17. Employees shall use language that is respectful and professional when communicating with persons served, employees, volunteers, and other stakeholders.
18. Employees shall adhere to SHDC's accessibility policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, and transportation.
19. Employees shall practice within their areas of competencies and develop and enhance their professional expertise.
20. Employees shall maintain and update their professional licenses, credentials, certifications and clinical privileges.
21. Employees shall respect and promote the rights of persons served to self determination, and assist persons served in their efforts to identify and clarify their goals.
22. Employees shall write legibly and use clear, specific and understandable language in the documentation of persons' served case activities.
23. Employees shall use clear and understandable language to inform persons served of the purpose of services, and risks related to services.

24. Employees shall use clear and understandable language to inform persons of limits to services, because of the requirements of a third party payer.
25. Employees shall provide persons served with reasonable access to their records.
26. Employees shall not use derogatory language in their written or verbal communication to, or about, persons served.
27. Employees shall practice within their areas of competencies and develop and enhance their professional expertise.
28. Employees shall use accurate and respectful communication to, and about, persons served.
29. Employees should make reasonable efforts to ensure continuity of services in the event that services are interrupted by factors such as unavailability, relocation, illness, disability, or death.
30. Employees are prohibited from having clients sign blank forms.
31. Staff shall not discuss client's case information without provisions for relative confidentiality.
32. Staff shall not leave persons served records on desks, or in any other unsecured manner, thus violating persons' served confidentiality.
33. Employees shall not intentionally or unintentionally mismanage the resources of the organization or other stakeholders.

Professional Responsibilities

1. Employees shall behave in a manner that demonstrates dignity and respect to persons served, staff members, visitors, volunteers, and other stakeholders.
2. Employees shall behave in a trustworthy manner with all stakeholders, including but not limited to, persons served, supervisors, co-workers, volunteers, visitors, and funders.
3. Employees are prohibited from engaging in verbal/sexual harassment, physical abuse or neglect of persons served or persons within the person's served care system, including person's served family or friends.
4. Employees shall use language that is respectful and professional when communicating with persons served, employees, volunteers, and other stakeholders.
5. Employees shall not falsify agency records, persons' served records, and/or other documents associated with their employment with SHDC.
6. Employees shall adhere to SHDC's accessibility policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, and transportation.
7. Employees shall not divulge confidential material or information to unauthorized persons.

8. Employees shall protect the confidentiality of persons' served written, verbal and electronic records and other sensitive information.
9. Employees shall ensure that persons' served records are stored in a secure location, and that persons' served records are not available to others who are not authorized to have access.
10. Employees must be courteous, respectful, and truthful to supervisors, visitors, volunteers, co-workers, persons served, referring workers/agencies, and any and all other persons associated directly or indirectly with SHDC.
11. Employees shall provide services to persons served only in the context of a professional relationship based upon valid and informed consent.
12. Employees shall not post any information regarding persons served on any social media outlet, e.g., Face book, Twitter, blogs, etc.
13. Employees shall not provide services to individuals with whom they have a personal, intimate, including dating, prior or current sexual relationship.
14. Employees should make reasonable efforts to ensure continuity of services in the event that services are interrupted by factors such as unavailability, relocation, illness, disability, or death.
15. Employees shall accept the responsibility to advocate for persons served and protect the community in which our persons serve live against unethical and hypocritical practices by individuals or organizations engage in social welfare activities.
16. Employees shall not intentionally or unintentionally mismanage the resources of the organization or other stakeholders.
17. Employees shall not engage in fundraising activities that are not sanctioned and approved by the EC as permissible fundraising activities. Examples of fundraising activities that would not be under the domain of the organization may include: the selling of cookies, candy, tickets, or other items that are personal initiatives of an employee and/or is or her family member.
18. Employees, as may be appropriate in their role, shall respect and safeguard the personal property of persons served, visitors, and personnel, and all property owned by the organization.
19. Employees shall not use the organization's property for personal use.

Human Resources

SHDC maintains an at-will employment status. This section is not intended to define SHDC's comprehensive "Personnel Policies and Procedures" manual. Please refer to the organization's "Personnel Handbook" manual for more detailed information regarding human resources issues.

1. Degree professional employees must practice within the legal constraints of their state license(s) and adhere to the ethics codes of their profession.
2. Employees shall act in a manner that promotes and preserves the professional social work values and the practice standards of clinical social work.
3. Employees shall make clear their role when speaking or acting as a private individual rather than as a professional or as a representative of a professional organization.
4. When more than one employee is involved in the care of a person's served, employees seek to coordinate services. They are obligated to address any collaborative issues that are not in the best interest of the persons served.

Personal Behavior

1. Employees shall behave in a manner that demonstrates dignity and respect to persons served, staff members, visitors, volunteers, and other stakeholders.
2. Employees shall be honest and truthful in their documentation and reporting.
3. Employees shall use language that is respectful and professional when communicating with persons served, employees, volunteers, and other stakeholders.
4. Employees shall adhere to SHDC accessibility policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, and transportation.
5. Sleeping on the job is prohibited.
6. The use of any controlled substances while on the job, coming to the job, or while doing any related work activities, is strictly prohibited.
7. Engaging in the sale, transfer, or use of alcohol, tobacco, or other drugs, or the abuse of over-the-counter medication, while on duty or on SHDC premises, or in any associated activity related directly or indirectly to SHDC is strictly prohibited.
8. Employees must maintain an acceptable self-appearance. Dress should be in accordance with the job and the dictates of the occasion.
9. Employees are prohibited from engaging in verbal/sexual harassment, physical abuse or neglect of persons served or persons within the person's served care system, including person's served family or friends.
10. Employees shall not use nor abuse the personal property of SHDC, including telephones, computers, cell-phones, copier machines, or any other equipment or property of SHDC for non SHDC related activities.
11. Employees are expected to perform his/her tasks on time, especially those that are a part of his/her job description.
12. Employees shall not intentionally or unintentionally mismanage the resources of the organization or other stakeholder.

Organizational Fundraising

It is the policy of SHDC that all fundraising activity is supervised, coordinated and directed by the Executive Director. All fundraising will comply with federal, state, and local laws, as well as applicable ethical norms regarding fundraising activities. The Board of Director's Governance Committee shall annually review all fundraising activity by SHDC.

Prohibition of Waste, Fraud, Abuse, and other Wrongdoing

It is the policy of SHDC that employees, volunteers, or other stakeholders may not participate in fraud, abuse, waste of resources or other wrongdoing, whether illegal or unethical. Ethical violations and legal/unethical wrongdoing shall be reported. Employees are encouraged to report any suspicion or evidence in the aforementioned areas to their immediate supervisor, ALTRES, or Corporate Compliance Officer. SHDC shall uphold a "no-reprisal" approach for employees and volunteers for reporting suspected incidents of waste, fraud, abuse, and other questionable activities and practices, and/or violations of ethical codes.

Written Procedures to Deal with Allegations of Violations of Ethical Codes

SHDC's Corporate Compliance Committee is comprised minimally of the Corporate Compliance Officer, MH Program Manager, and Program Specialist. The committee is chaired by the Corporate Compliance Officer. This committee will receive all Incident Reports containing violations of the Code of Ethics. The committee will receive the report, conduct the investigation, record the investigation, and provide feedback and follow up, as may be appropriate.

SHDC shall uphold a "no-reprisal" approach for employees and volunteers in reporting suspected incidents of questionable activities and practices within the organization. A "no reprisal" approach simply means that employees shall not be subject to any retaliation, penalties, discrimination, confrontation, or any other type of consequences for making a report.

A. Reporting

Any staff member may report a violation of the Code of Ethics verbally to the Corporate Compliance Officer. However, an Incident Report must be completed and submitted to staff's supervisor, the Corporate Compliance Officer, and the

Executive Director. Staff is encouraged to report the incident within 10 working days. Reports will still be accepted if they are submitted more than 10 working days after the occurrence. The Corporate Compliance Committee will issue an annual report to personnel and the Board of Directors on the number and types of Corporate Compliance violations.

B. Investigation

The Corporate Compliance Committee will investigate the report within five (5) business days of receiving the report and complete the investigation with a final report completed within 15 days. The Executive Director will facilitate and approve the recommendations of the committee, which may include training, supervision, and/or disciplinary action.

C. Acting on Violation

If there is sufficient evidence, as determined by the investigation, a report and recommendation will be submitted to the Executive Director by the Corporate Compliance Committee. The Executive Director will facilitate and approve the recommendations of the committee, which may include, but not limited to a number of corrective action strategies, including training, supervision, and/or disciplinary action.

D. Documenting the Investigation

The Corporate Compliance Committee will maintain a log of all Code of Ethics investigations and report same to the Executive Director on an annual basis. In addition to maintaining a log, the committee will use the following process:

- Create a separate file for the investigation
- The investigation file should include:
 - ✓ The complaint
 - ✓ The report of investigation

The Corporate Compliance Officer will report to the Board on an annual basis an analysis on Code of Ethics violations and/or trends and patterns.

Monitoring

The Corporate Compliance Committee shall ensure that the Code of Ethics is clearly communicated to staff on an ongoing basis. The methods of communication will be as follows:

- Each new hire, whether full-time, part-time, or contractual, will receive a copy of the Code of Ethics on their first day of employment.
- Each new hire will sign off acknowledging receipt and understanding of SHDC's Code of Ethics.
- The Code of Ethics will be shared with staff at new staff orientation training.
- The Compliance Officer will monitor trends, patterns, and code violations and recommend to the Executive Director additional training or supervision strategies to reinforce compliance with the Code of Ethics.

Education on Ethical Codes of Conduct for Personnel and Other Stakeholders

SHDC continues to support training and education for staff to remain in compliance and current in their respective field in order to demonstrate strategies and interventions that are based on accepted practices and current research, evidence-based practice, peer-reviewed scientific and health-related publications, clinical practice guidelines, and/or expert professional consensus.

Leadership supports and sponsors access to learning opportunities and reference materials through webinars for staff and stakeholders/collaborative partners; agency subscribes to magazine and subscriptions related to relevant fields; agency collaborates with other organization/schools for in-service workshops and community meetings and agency supports time off and financial assistance for staff to attend conferences.

The Corporate Compliance Officer remains current on policies and practices in the field via online training documents and printed publications/books.

Advocacy Efforts

SHDC continues to advocate for persons served, personnel, and other community stakeholders. SHDC's advocacy efforts include conducting and participating in public education or activities that promote the elimination of discrimination and stigma for the persons served. SHDC incorporates the use of "people first" language in its publications, operations, and activities.

SHDC personnel participate in a variety of public education efforts, community boards and committees.

SHDC 's advocacy efforts also include providing written testimony and developing and submitting position statements that support the needs of persons served and/or the needs for policy revisions at the local, state, and federal levels. SHDC works in collaboration with other organizations to coordinate our advocacy efforts on behalf of not only persons served, but SHDC's general geographic service area as well.

SHDC will continue to demonstrate a commitment and value for advocacy services on behalf of persons served through a number of venues, including the consumer's rights process, corporate responsibility strategies, and as a part of ongoing service delivery.

The continuum of advocacy services will include from time to time, based upon the changing needs of persons served and the community, the following:

- Linking persons served to local advocacy groups, agencies, and organizations.
- Personal Advocacy: One-on-one advocacy to secure the rights of the persons served.
- Systems Advocacy: Seeking to change a policy or practice that affects the person served.
- Legislative Advocacy as permitted by law: Seeking legislative enactments that would enhance the rights of and/or opportunities for the person served.
- Legal Advocacy: Using the judicial and quasi-judicial systems to protect the rights of the person served.
- Self-Advocacy: Enabling the persons served to advocate on his/her behalf.

Corporate Citizenship

SHDC encourages corporate responsibility at all levels of the organization. Corporate responsibility demonstrates what an organization stands for including its ethical, social, and environmental values. It involves creating, communicating, and balancing values for all stakeholders. Corporate responsibility assists in advocating for the persons served; promoting ethical business practices; developing efficiency as an organization; and considering the impact of organizational activities on persons served, personnel, other stakeholders, and the environment.

Conflicts of Interest

- Employees shall be alert to, and avoid, conflicts of interest that interfere with the exercise of professional discretion and impartial judgment.
- Employees shall not engage in fundraising activities that are not sanctioned and approved by the EC as permissible fundraising activities. Examples of fundraising activities that would not be under the domain of the organization may include: the selling of cookies, candy, tickets, or other items that are personal initiatives of an employee and/or is or her family member.
- Employees should inform persons served when a real, or potential, conflict of interest arises, and take reasonable steps to resolve the issue in a manner that makes the persons' served interest primary and protects the persons' served interest to the greatest extent possible.
- Employees should not directly or indirectly engage in any employment activity or enterprise which is inconsistent, incompatible or in conflict with his/her duties as a SHDC employee, or with the duties, functions and responsibilities of the program in which he/she is employed. The policy is not meant to restrict or infringe upon the activities of the employee or his/her family but is intended to protect SHDC from instances where the achievement of its goals is impeded by the intentional or unintentional acts of its employees.

The following are considered to be incompatible types of activities:

1. Any unauthorized employment, activity, or enterprise involving the use for private gain or advantage, the agency's time, facilities, equipment, supplies, clients, other employees, mediated materials in which the agency has proprietary interest, or the prestige of the agency or the influence of the office or position held by the employees.
2. The receipt by the employee of any money, exchange of gifts, gratuities, or other consideration from anyone other than SHDC for the performance of any act which he/she would be required or expected to render in the regular course of his/her duties as a SHDC employee.
3. Activity that involves so much of the employee's time that it impairs his/her attendance, effectiveness, or efficiency in the performance of his/her duties. This does not prohibit the employee from holding other employment that has been discussed by the Executive Director, so long as those hours do not overlap or coincide with his/her required time as set forth by SHDC and so long as his/her work performance is not affected by the outside employment. If he/she wishes to work on a second job or equivalent, he/she must give details of this to his/her

supervisor and work out any conflicts through the Executive Director before accepting such employment or engaging in the enterprise.

4. Full-time employment at another agency or organization that is in direct conflict with full-time employment at SHDC is not permitted.

This policy is not meant to and does not preclude outside employment or activities which are, in effect, “joint ventures” between the employee and another agency. Outside employment and “joint ventures” must be review by the Executive Director to determine that a conflict of interest does not exist.

Protocol Regarding Media Relations & Social Media

The Executive Director (ED) is the individual authorized to communicate with the media, unless otherwise authorized by the ED in writing. All press releases and other communications with the media must be approved by the ED prior to dissemination. The posing of information regarding the organization on the organization’s website, Face book, Twitter, blogs, etc. must be approved by the ED or designee. Employees shall not post information regarding persons served on the organization’s website or any social media outlet, e.g., Face book, Twitter, blogs, etc. Social media is not a confidential form of communication. SHDC is committed by policy, practice, and legal requirements to maintain and guard the confidentiality of all persons served. There, it is the policy of SHDC that no employee may communicate or befriend a consumer of SHDC utilizing social media. This is applicable for present consumers or former consumers. Any violation of the established protocol will prompt a Corporate Compliance investigation. If you discover that you were unknowingly or unintentionally communicating with a SHDC consumer, either present or past, please submit an Incident Report to the Corporate Compliance Officer.

STEADFAST HOUSING DEVELOPMENT CORPORATION CODE OF ETHICS

I UNDERSTAND THAT:

Investigations of code of ethics violations will begin within 5 days of receipt of the report. All involved parties and witnesses will be required to cooperatively participate in the investigation. Every effort will be made to conclude investigations as soon as practicable, with a goal of concluding the investigation within 15 days of the receipt of the report. However, unforeseen circumstances, such as absences, may prolong the investigation.

A violation of certain standards of this Code of Ethics may be grounds for my immediate dismissal by the Executive Director under Employment Status & Dispute Resolution of the Personnel Policy & Procedure Manual with appropriate grievance procedures to be followed as indicated in Section II of the same manual. Violation of other standards of the Code may be cause for written reprimand, disciplinary action or suspension.

My signature indicates receipt of and an understanding of Steadfast Housing Development Corporation's Code of Ethics.

Signature

Date

Print Name

Corporate Compliance Officer

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