

RESOLUTION NO. 2017-13

A RESOLUTION OF THE ESCAMBIA COUNTY HOUSING FINANCE AUTHORITY APPROVING AN ETHICS AND FRAUD HOTLINE POLICY; AND PROVIDING AN EFFECTIVE DATE.

BE IT RESOLVED BY THE ESCAMBIA COUNTY HOUSING FINANCE AUTHORITY:

Section 1. The Policy. The Escambia County Housing Finance Authority hereby approves the Ethics and Fraud Hotline Policy attached hereto as Exhibit "A", which formally sets forth the Authority's policy on the implementation and use of the Authority's Ethics and Fraud Hotline.

Section 2. Effective Date. This resolution and Ethics and Fraud Hotline Policy shall take effect immediately upon adoption.

DULY ADOPTED in public meeting on this 14th day of November, 2017.

ESCAMBIA COUNTY HOUSING FINANCE AUTHORITY



ATTEST:

(SEAL)

By: Sandra J. Ward
Sandra J. Ward, Chair

By: Robert C. Maloy
Robert C. Maloy, Secretary

Approved as to legal sufficiency:

By: Patricia D. Lott
Patricia D. Lott,
General Counsel

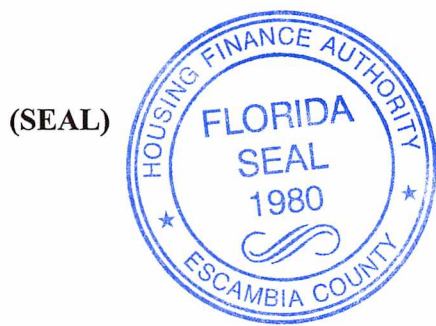
Date: 11/15/17

STATE OF FLORIDA

COUNTY OF ESCAMBIA

I, Robert C. Maloy, Secretary of the Escambia County Housing Finance Authority in and for the County and State aforesaid, do hereby certify that the above and foregoing is a true and correct copy of the original resolution approving an Ethics and Fraud Policy as the same was duly approved at a regular meeting of the Authority on the 14th day of November, 2017, and as the same appears on record in my office.

IN WITNESS WHEREOF, I hereunto set my hand and official seal this 14th day of November, 2017.



By: 
Robert C. Maloy, Secretary

ESCAMBIA COUNTY HOUSING FINANCE AUTHORITY

ETHICS AND FRAUD HOTLINE POLICY

1.00 SCOPE:

This policy applies to all employees of the Escambia County Housing Finance Authority (the “Authority”), including part time, temporary and contract employees and participants in the Authority’s Single-Family Mortgage Loan Program (the “Participants”). This policy is intended to implement the Authority’s decision to make a hotline available to accept reports of fraud and ethics violations. Nothing herein is intended to conflict with or abrogate the provisions of the Florida Whistle-blower’s Act, Sections 112.3187-112.31895, Florida Statutes.

2.00 PURPOSE:

The Authority is committed to the highest possible standards of ethical, moral, and legal business conduct. In conjunction with this commitment and the Authority’s commitment to open communication, this policy aims to provide an avenue for employees and Participants to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith. However, if an employee or Participant believes that anonymity is not required then they may choose to contact the Authority’s Executive Director at pat.lott@escambiahfa.com or the Authority’s CFO at susan.stephenson@escambiahfa.com .

3.00 POLICY:

This policy is intended to address concerns that could have a significant impact on the Authority, such as actions that:

- May lead to incorrect financial reporting;
- Are unlawful;
- Are not in line with the Authority’s policies or the provisions of the Code of Ethics for Public Officers and Employee, Part III of Chapter 112, Florida Statutes; or
- Otherwise amount to serious improper conduct.

Regular business matters that do not require anonymity should be directed to the employee’s supervisor, the Authority’s Executive Director or CFO, as appropriate, and are not addressed by this policy.

4.00 SAFEGUARDS:

4.1 Harassment or Victimization

Harassment or victimization of individuals submitting hotline reports will not be tolerated.

4.2 Confidentiality

Every effort will be made to protect the reporter’s identity by the Authority’s hotline vendor. Please note that the information provided in a hotline report may be the basis of an internal and/or external investigation by the Authority into the issue being reported. It is possible that

as a result of the information provided in a report the reporter's identity may become known during the investigation.

4.3 Anonymous Allegations

The policy allows employees to remain anonymous at their option. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

4.4 Malicious Allegations

Malicious allegations may result in disciplinary action.

5.00 PROCEDURE:

5.1 Reporting

The procedures set forth herein are intended to be used for serious and sensitive issues. Serious concerns relating to fraud, failures in financial reporting, or unethical or illegal conduct, may be reported in either of the following ways:

- Website: www.lighthouse-services.com/escambiahfa
- English speaking USA and Canada: (833) 350-0040 (not available from Mexico)
- Spanish speaking North America: (800) 216-1288 (from Mexico user must dial 01-800-681-5340)
- E-mail: reports@lighthouse-services.com (must include Authority's name with report)
- Fax alternative for written documents: 215-689-3885 (must include Authority's name with report)

Reporters to the hotline will have the ability to remain anonymous if they choose. Please note that the information provided by you may be the basis of an internal and/or external investigation into the issue you are reporting and your anonymity will be protected to the extent possible by law. However, your identity may become known during the investigation because of the information you have provided. Reports are submitted by Lighthouse to the Authority or its designee, and may or may not be investigated at the discretion of the Authority, subject to the requirements of Florida law.

Employment-related concerns should continue to be reported through your normal channels such as your supervisor, or to the Executive Director (850-432-7077).

5.2 Timing

The earlier a concern is expressed, the easier it is for us to take action.

5.3 Evidence

Although you are not expected to prove the truth of an allegation, the employee submitting a report needs to demonstrate in their hotline report that there are sufficient grounds for concern.

6.00 HOW THE REPORT WILL BE HANDLED:

The action taken will depend on the nature of the concern. The Audit Committee of the Authority Board of Directors receives a copy of each report and follow-up reports on actions taken by the Authority.

6.1 Initial Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation.

6.2 Feedback to Reporter

Whether reported directly to Authority personnel or through the hotline, the individual submitting a report will be given the opportunity to receive follow-up on their concern:

- Acknowledging that the concern was received;
- Indicating how the matter will be dealt with;
- Giving an estimate of the time that it will take for a final response;
- Telling them whether initial inquiries have been made; and
- Telling them whether further investigations will follow, and if not, why not.

6.3 Further Information

The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the employee remains accessible for follow-up. Further information may be sought from the reporter.

6.4 Outcome of an Investigation

At the discretion of the Authority and subject to legal and other constraints the reporter may be entitled to receive information about the outcome of an investigation.

The Authority reserves the right to modify or amend this policy at any time as it may deem necessary.