

# **Genesee County Land Bank Authority Fair Housing Policy Statement**

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**Equal housing opportunity for all persons, regardless of race, color, national origin, religion, age, sex, familial status, marital status, sexual orientation or disability, is a fundamental policy of the Genesee County Land Bank Authority (GCLBA).**

**GCLBA is committed to diligence in assuring equal housing opportunity and non-discrimination to all aspects of its housing activities.**

**As a county governmental authority undertaking housing activities, GCLBA has an ethical as well as legal imperative to work aggressively to ensure that GCLBA housing programs comply fully with all local, state and federal fair housing laws.**

**For questions on Fair Housing, please contact:**

**Phil Stair, Fair Housing Compliance Specialist  
(810) 257-3088 Ext 525; fax (810) 257-3090  
or [pstair@thelandbank.org](mailto:pstair@thelandbank.org)**



# FAIR HOUSING POLICY



The Genesee County Land Bank Authority (GCLBA) is unequivocally and firmly committed to the principle of equal opportunity in housing and the provision of equal professional services without discrimination based on race, color, religion, sex, handicap, familial status or national origin.

Fair housing is a serious matter. The GCLBA has the legal, ethical and moral responsibility to do everything in its power to prevent any employee associated with the organization from committing any act or making any statement that could be perceived in any way discriminatory based on race, color, religion, sex, handicap, familial status or national origin.

All employees must be aware of organization policy concerning showing properties, negotiating offers and serving the needs of buyers and prospective tenants without discriminatory effect.

## **Fair Housing Officer**

The GCLBA employs a fair housing officer who is responsible for training and will facilitate fair housing issues and concerns. Cooperation with the fair housing officer is required during investigations of alleged discrimination or in the review of equal service records.

## **Public Commitment**

The GCLBA is firmly and unequivocally committed to the provision of equal professional services and to the principle of fair housing for all. The procedures and requirements that follow are designed to implement that commitment, and all associated with the organization are expected to share in that commitment and its implementation. The HUD fair housing poster, which includes the Code of Equal Opportunity in Housing, is displayed in a prominent place in each office.

## **Advertising and Marketing**

All advertising for the sale or rental of housing will indicate to the public that the housing is open to all persons and is designed to attract buyers and renters without regard to race, color, religion, sex, handicap, familial status or national origin.



All brochures, circulars, billboards and direct-mail advertising will include the official equal housing opportunity slogan or logotype. All forms of advertising, including business cards, will contain the official equal housing opportunity slogan or logotype. All advertising paid for by employees must comply with equal housing guidelines and be approved by the sales manager/fair housing officer.

## **Training**

GCLBA provides ongoing training in fair housing law obligations and the organization's fair housing procedures. Staff meetings will address fair housing issues on a regular basis. All employees are encouraged to raise fair housing concerns for discussion.

All employees will receive printed materials/booklets related to fair housing, which must be read, understood and complied with. Training, discussion and quizzes relating to these printed material/booklets will be ongoing.

## **Equal Professional Service Procedures**

All those associated with the organization will provide equal professional service without regard to a buyer, seller or prospective tenant's race, color, religion, sex, handicap, familial status or national origin.

## **Prohibited Actions**

During the conduct of business, no employee will make any statement or perform any act that could:

- Imply that the presence or anticipated presence in a neighborhood of persons of any race, color, religion, sex, handicap, familial status or national origin will, or may have, results such as the lowering of property values, changing the composition of the block or neighborhood, making the area less safe or contributing to a decline in the quality of schools.
- Imply that persons of a particular race, color religion, sex, handicap, familial status or national origin will be less able to obtain financing on a property.
- Imply that we adhere to any racial, color, sexual, family, religious, national origin or handicap stereotypes that might result in different treatment of minority groups in the sale or purchase of housing. This includes telling jokes, making derogatory remarks to other employees or employees or to agents or employees of another organization, to a buyer or seller or anyone who might become a buyer or seller or who might be in a position to report our remarks to others.

It is the responsibility of all of us at GCLBA to assist others who may be unknowingly in violation. For your own protection it is suggested that upon hearing or learning of questionable statements or incidents, the employee or employee should disassociate himself or herself from the sentiment expressed and seek assistance directly from the organization's fair housing officer.

No employee shall make any representation, either directly, or by innuendo, that a neighborhood will be difficult/easy to sell because of the presence or absence of

persons of a particular race, color, religion, sex, handicap, familial status, or national origin—that it is more or less safe, that schools are better or not as good, or that property values are increasing or decreasing.

No employee shall refuse to list or show a property in a market area served by the organization because of the presence/absence of persons of any particular race, color, religion, sex, handicap, familial status or national origin.

### **Working with Prospective Buyers**

Consistent interviewing and qualifying techniques must be used with all buyers, and adequate records must be maintained by employees to demonstrate that all buyers are treated equally. Using consistent and systematic procedures, the employee will obtain objective information regarding the prospect's needs and wants.

The employee has no duty to disclose the racial, ethnic or religious composition of any neighborhood, community or building, nor whether persons with disabilities are living in a home or facility, except that the agent may identify housing facilities meeting the needs of a disabled buyer.

### **Financial Qualifications**

All employees will use consistent and uniform methods to qualify all prospects. Information on all financing options identified by the organization will be provided to the prospect.

Under no circumstances is any prospect to be directed to, or away from, any specific type of financing, including FHA, because of race, color, religion, sex, handicap, familial status or national origin.

### **Property Offered and Shown**

All prospects will be informed that any available property in the market area, within the buyer's price range and objective criteria, is available for showing, and employees will offer to show any such properties.

Additionally, employees will offer to show properties in other geographic areas, when those properties are otherwise within the buyer's price range and objective criteria.

### **Working with Cooperating Agents**

All employees will be equally cooperative with agents who are working with minority buyers, or with agents who we know or think are working with minority buyers, as they are with all other agents in terms of setting up showings, making keys available, and setting appointments to present offers or conducting negotiations.

### **Recordkeeping**

Employees must keep records for all properties and all prospects. These records should be completed after the first contact with a prospect in which such identifying information as name, phone number, or address are obtained or after the first in-person contact.

Employee's prospect records must be kept on file for at least five years. These files are to be marked with a prospect's name and dates of service (first and last). These records or files remain the property of the GCLBA.

### **Hiring and Recruitment Policies**

The GCLBA will affirmatively recruit persons of all racial and ethnic groups, of both sexes, with and without disabilities, and individuals otherwise protected from discrimination by the Fair Housing Act, as salaried employees and independent contractors.

All advertising for salaried employees and independent contractors will contain the phrase "Equal Employment Opportunity."

Each salaried employee and independent contractor, as a condition of employment or contract with the firm, must sign the following agreement:

*"I have been given written information about fair housing laws and organization policy and procedures. I understand what is required of me and agree to comply with all applicable fair housing laws and related policies and procedures in conducting business."*

### **Community Participation**

The GCLBA is part of the community and encourages participation in fair housing and community outreach activities. The fair housing officer will coordinate such organization participation and should be informed of all community fair housing concerns.

### **Responses to Possible Discrimination**

Alleged acts of discrimination, whether by employees of this or another firm or by members of the public, are to be immediately brought to the attention of the fair housing officer. It is the policy of this organization to cooperate in the investigation of fair housing complaints and, when appropriate, to file complaints on our employees' behalf.

When working with prospects or clients who may be victims of discrimination, the fair housing officer will determine how best to assist them in the protection of their fair housing rights.

### **Report Incidents of Harassment**

Any harassment incident of buyers, or sales agents in violation of fair housing laws will promptly be reported to the fair housing officer and appropriate authorities, which may include local or state police, local or state human rights agencies, the U. S. Department of Justice, HUD and the FBI.

### **Quality Control**

The management of GCLBA will review compliance with these procedures on a regular basis. All employees must cooperate with that review and will provide copies of records when requested.

### **Corrective Action and Discipline**

The fair housing officer and GCLBA/owner will review any apparent act or statement in violation of these procedures or fair housing laws and will decide on further action. Depending on the severity of the act or statement and the relationship between the employee and the organization, actions may include further training and education or termination of the independent contractor agreement.

### **Reporting Acts of Discrimination**

When working in the housing market, employees may encounter situations which appear to be discriminatory and in violation of fair housing laws.

In order to protect the prospective home seeker's rights to equal opportunity in housing and to keep yourself from participating in those discriminatory acts, employees need to take the following steps:

- Talk to the party who appears to be violating the law and explain fair housing laws to that person. Ask that person to act in a nondiscriminatory fashion. This often resolves the matter and results in the home seeker obtaining access to housing as guaranteed by fair housing laws. Contact the organization fair housing officer, the GCLBA and the organization attorney to follow up with a letter summarizing your discussion.

If the party discriminating is a client of another REALTOR®:

- Talk to the REALTOR® and explain your concerns. Ask the other REALTOR® to speak with the client to end the discriminatory behavior. Contact the organization fair housing officer, the GCLBA and the organization attorney to follow up with a letter summarizing your discussion.

If the discrimination continues and the party discriminating is not your client:

- Inform the home seeker regarding what has occurred and your belief that discrimination was involved. Provide the home seeker with information on where to file a complaint. Contact the organization fair housing officer, the GCLBA and the organization attorney to follow up with a letter to the home seeker summarizing your discussion.

If the discrimination continues and the party is another REALTOR®:

- In addition to the above, you may file an ethics complaint with the Association of REALTORS® alleging violation of Article 10 of the Code of Ethics.

### **Protect Your Own Fair Housing Rights**

You may also have a cause of action against the discriminating party and may file a complaint on your own behalf. You may report any incident of discrimination to an appropriate agency without filing a complaint.

### **Cultural Diversity**

Employees MUST respect the cultural diversity of other employees in the organization and their individual rights to self-identification. The tenets of fair housing and civil rights apply equally to all activities within the offices of the GCLBA.

### **AGENCIES TO WHOM ACTS OF DISCRIMINATION MAY BE REPORTED:**

Anyone who feels he or she has been discriminated against may file a complaint of housing discrimination with:

**Genesee County Land Bank Authority**  
810.257.3088

**Fair Housing Center of Eastern Michigan**  
1-800-322-4512 or (810) 234-2621

**U.S. Department of Housing and Urban Development**  
1-800-669-9777 (Toll Free) or 1-800-927-9275 (TTY)