

Anti-Fraud Policy

Policy Statement & Purpose

Bromford have a zero-tolerance approach to fraud. As a social enterprise and ethical business, we're committed to upholding the highest standards of probity and transparency to protect our assets and reputation and safeguard public funds.

Fraud is an act of deception done for personal or financial gain, to avoid an obligation or cause loss or disadvantage to others. It's a serious criminal offence punishable by fine or imprisonment.

Scope

The principles and terms within this document apply to all colleagues within Bromford Housing Group (Bromford) and all related subsidiaries.

Reference Documents

This policy is published on our group intranet ('Mint/OurSpace') website.

Additional guidance, related policies and procedures:

Bromford	Merlin
Anti-Money Laundering Policy	
Probity and Bribery Policy	
Whistleblowing Policy	
Anti-Fraud How To	Employees Code of Conduct
Anti-Money Laundering How To	Procurement Toolkit
Risk Management Policy	
Risk Management How To	

Legislative Requirements

Bromford's policy is to comply with the applicable laws and legislation:

- [Fraud Act 2006](#)

Bromford will comply with the specific expectations of the Regulator of Social Housing (RSH's) Governance & Financial Viability Standard which require registered providers to "provide accurate and timely returns to the regulator, including an annual report on any losses from fraudulent activity, in a form determined by the regulator".

Responsibilities

For any enquiries about this Policy please contact the Governance, Risk and Assurance Team.

The Board has overall responsibility for this policy and is responsible for making sure that:

- An anti-fraud culture is established and promoted;
- Effective controls are in place to prevent and detect fraud;
- All instances of fraud and suspected fraud are investigated promptly and thoroughly;
- Further action is taken with the appropriate authorities when necessary.

The Board can delegate responsibility for doing this to the Audit and Risk Committee.

The Audit and Risk Committee:

- Approve the Anti-Fraud Policy;
- Receive and consider a bi-annual report from the Chief Risk Officer on how internal controls have operated, including those in relation to fraud;
- Approve an annual report to our regulator, the RSH, on losses from fraudulent activity. This includes reviewing the register of cases of fraud and suspected fraud maintained by the Governance, Risk and Assurance Team.

Leaders are responsible for engaging with their team to:

- Promote a culture of openness and honesty;
- Communicating the importance of fraud prevention & detection to colleagues;
- Encouraging colleagues to report legitimate concerns regarding fraud or suspected fraud promptly;
- Responding promptly to allegations of fraud and reporting these to the Governance, Risk and Assurance Team, or they may also be received via Whistleblowing or Probity and Bribery processes;
- Implement and maintain the processes and procedures;
- Ensure that their people are aware of their responsibilities and receive appropriate training;
- Engage via the Governance, Risk and Assurance team; in cross-sector initiatives (including the National Anti-Fraud Network and National Fraud Initiative) to identify fraudulent behaviour and activities; and
- Maintain effective working relationships with relevant external organisations (e.g. the police, specialist legal firms, the National Anti-Fraud Network, etc.).

Functional Directors are responsible for:

- Making sure that operational risk registers in their areas of the business consider fraud risk and that effective internal controls are put in place; and
- Completing quarterly Internal Control Returns which ask them to confirm that internal controls in their area of the business have operated effectively, and that any instances of fraud or suspected fraud in their business area have been reported.

All colleagues are responsible for:

- Carrying out their work in line with this policy and associated procedures;
 - Applying our values and behaviours in everything they do;
 - Reporting immediately if they suspect or believe that there is evidence of irregular or improper behaviour or that a fraud has been committed;
 - Acting with propriety in the use of the Group's resources, in the handling and use of funds or dealing with contractors, suppliers or customers.
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Policy Principles

We expect all colleagues to work with integrity, trust and fairness. We use internal controls with regard to fraud prevention and detection for example, process and procedures are in place and are readily available to colleagues. These are supplemented by other activities such as internal and external audit in assessing the effectiveness of the control framework. However, these controls are proportionate to the risks we face and can only provide reasonable and not absolute assurance that material fraud will be detected and prevented.

We expect colleagues to be aware of the risk of fraud in their business area and report all suspicious activity to a senior colleague as soon as possible. Legitimate concerns will be taken seriously and treated in the strictest of confidence.

Reports about suspicious activity will be investigated thoroughly. If necessary, we'll involve the appropriate authorities to help us do this and recover any losses we've suffered. All instances of fraud or suspected fraud will be reported to the Board's Audit and Risk Committee and our internal and external auditors. Any losses from fraud are reported annually to our regulator, RSH.

Risks

- Absence or failure of a counter fraud control framework including financial controls leads to incidents of internal or external fraud or corruption which negatively impacts on Bromford's resources and reputation, or financial irregularities or fraud, budgetary overspends, legislative or regulatory breaches etc;
 - Failure to identify and/or mitigate attempts to secure an illegal financial benefit either internal or external, including fraud or money laundering; and
 - Fraud or corruption negatively impacts on Bromford's resources and reputation.
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Assurance Framework

A fraud controls assurance framework is maintained. This assurance framework includes risk metrics and key controls for key fraud risk areas. The key controls have been identified from our financial regulations, other key policies and procedures and from discussions with relevant managers and colleagues.

The overarching fraud assurance framework will be owned by the Chief Risk Officer.

Assurance will be provided by metric and control owners, who remain responsible for operating the control framework, on a twice-yearly basis to the Audit & Risk Committee.

Additionally:

- All colleagues are required to confirm they have read and understand this policy;
 - All colleagues will be required to complete appropriate training relating to this policy which will test understanding;
 - We will produce an annual compliance statement and have periodic independent reviews to confirm that we follow the policy principles;
 - This policy will be reviewed every three years or sooner if changes are made to organisational structure, responsibilities, assurance arrangements or due to changes in the external environment.
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Document Details

Owner: Sarah Beal – Head of Governance
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