

Probity and Anti-Fraud Policy

Jigsaw

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1 Aims

1. The purpose of this policy is to establish guidelines on expectations of conduct, integrity and to ensure compliance with legal and regulatory requirements. The policy aims to uphold the reputation of the Group, maintain public trust, and prevent conflicts of interest.

2 Scope

2. This policy applies directly to all employees and board members of the Group. It is designed to govern the conduct of any employee or board member to ensure a consistent approach to probity.
3. The policy is also applicable to any company or individual the Group appoints to undertake work on its behalf.

3 Policy Statement

4. The Group expects its business to be conducted with integrity, impartiality and honesty at all times. In all its affairs the Group is committed to the highest standards of probity, openness and accountability. The Group takes a zero-tolerance approach to incidences of actual or attempted theft, deception, bribery, corruption, or money laundering, as well as any deliberate attempts to conceal such behaviour.
5. This policy sets out how the Group will deal with reports of Theft, Fraud, Bribery and Money Laundering, and sets out the expectations for individuals in ensuring that they maintain the highest standards of probity.
6. The Group is determined to nurture a culture of honesty and integrity and is resolute in its commitment to support those who come forward to express concerns by providing them with assurance that they can do so without fear of reprisal or victimisation. To reinforce this commitment the Group operates a Whistleblowing Policy which allows the reporting, in confidence, of legitimate concerns about the Group's activities.
7. Training on Group's Financial Regulations is provided annually. Failure to report any concerns in respect of a suspected breach of the Group's Financial Regulations may be treated as a disciplinary matter.
8. This policy is in keeping with the Group's current adopted code of conduct - National Housing Federation Code of Conduct 2022. The policy also prepares the Group for the adoption of the National Housing Federation Code of Conduct 2026 and the requirements under the Competency and Conduct Standard for employees and board members to exhibit the behaviours to ensure landlord services are of good quality.

3.1. Expectations of Employees and Board Members

9. All employees must abide by the Group's code of conduct and be aware of the policies and procedures relevant to their areas of work. Board members must abide by the

National Housing Federation's Code of Conduct which is the Group's adopted code.

10. Employees and board members must
- Act with propriety when using the Group's resources.
 - Be aware of the potential risk and signs of fraudulent activity, recognising that such activity can take place at any level within the organisation.
 - Feel able to challenge or question any unusual activity or transaction.
 - Not be dissuaded from reporting actual or potential theft, fraud or bribery as the Group is committed to supporting those who raise legitimate concerns.

3.2. Theft

11. Theft is defined by the Theft Act 1968 as the dishonest appropriation of property belonging to another with the intention to permanently deprive the other of it. The principal aim of theft is to acquire property.

3.3. Fraud

12. Fraud can be described as an act of deception, by intent or omission, which is made for personal gain or to cause a loss to another party regardless of whether the gain or loss actually occurs. It differs from theft by dishonestly using deception, non-disclosure, or abuse of position to obtain a gain or cause a loss.
13. The Fraud Act 2006 identifies three classes of fraud:
- False representation - knowingly providing incorrect information with the intention to deceive.
 - Failure to disclose information - not saying something when you have a legal duty to do so.
 - Abuse of position - abusing a position where there is an expectation to safeguard the financial interests of another person or organisation.

3.4. Bribery

14. Bribery is a criminal offence under the Bribery Act 2010 and is defined as offering, promising or giving someone a financial or other advantage to induce them to, or reward them, for improper performance of their functions or activities. This includes where it is known or believed that the acceptance of the advantage in itself constitutes improper performance. **Bribery often goes hand-in-hand with corruption, which is defined as the abuse of entrusted power for private gain. That gain could be for the individual or organisation concerned, or for others.**
15. Employees and board members should exercise care, and adhere to the policies and procedures, to protect themselves from bribery.

16. Any individual or organisation found to have offered or accepted a bribe shall immediately be debarred from any further transactions or employment with the Group. Whilst any employee or board member who offers or accepts a bribe will face disciplinary action which could lead to dismissal or removal.

3.5. Reporting Theft, Fraud or Bribery

17. The routes by which employees, board members or third parties can report any suspected or actual theft, fraud or bribery are outlined below. In the event a person or organisation has specific concerns about making a report they should refer to the Group's Whistleblowing Policy.
18. Incidences of tenancy fraud, for example, an applicant for housing not disclosing their true circumstances when obtaining a tenancy are dealt with under the Group's Tenancy Policy.

Employees

19. Should an employee become aware of any theft, fraud or bribery (whether suspected or actual), or the misappropriation or misuse of the Group's resources, or any breach of the Group's Financial Regulations they must immediately report this to their line manager, who will without delay, either notify their Executive/Group Director, or alternatively the Group Company Secretary.
20. Should their line manager not be available, or if their line manager is the person about whom the employee has concerns, then the employee should make their report directly to their Executive/Group Director, or alternatively the Group Company Secretary.

Board Members

21. Board members should report any concerns to their Chair and to the Group Company Secretary.
22. Should they not be available, or if either their Chair or the Group Company Secretary is the person about whom the board member has concerns, then they should make their report directly to either the Group Chair, the Chair of Risk & Audit Committee or the Group Chief Executive.

Third Parties

23. Concerns from third parties should be reported to the Group Company Secretary. If the concern relates to the Group Company Secretary, then this report should be made to either the Group Chief Executive or the Group Deputy Chief Executive.

Theft and Fraud Register

24. The Group Company Secretary will maintain a theft and fraud register and report on a quarterly basis to Risk and Audit Committee any actual or attempted theft or fraudulent activity.
25. Ordinarily the Group Company Secretary shall be responsible for making external reports of theft or fraud unless regulation or insurance requirements require this to be the Group Chief Executive.
26. The Risk and Audit Committee will review of entries in the theft and fraud register on a quarterly basis, seek assurances from officers and/or make recommendations to the Group board, landlord board or sub-committees as to changes in policies and working practices.
27. The Risk and Audit Committee shall approve an annual theft and fraud report which will be submitted to the Regulator of Social Housing.

3.6. Theft, Fraud and Bribery Investigations

28. Immediately upon being made aware of a suspected/actual theft, fraud or bribe the Executive/Group Director will notify Group Company Secretary and Executive Director - Finance (unless they are the focus of the concerns being raised - where this is the case the Group Chief Executive will be informed).
29. Collectively, they will determine;
 - Potential materiality.
 - Method of investigation.
 - Whether or not to report the matter to the Police - where a decision is taken not to report the matter to the Police - the reasons for this and the date of this decision will be recorded and passed to the Governance Team.
 - Immediate requirements relating to confidentiality and preservation of evidence.
 - Employee, board member, agent or contractor implications (for example, suspension of those suspected of being involved).
 - Reporting/notification requirements (for example EMT, Board, Regulators).
 - Any others who need to be involved (for example Internal Audit, Insurers, relevant managers and employees).

3.7. Money Laundering

30. The Group adheres to the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and recognises that a contravention of these regulations may be a criminal offence.

31. The Group takes measures to be vigilant against all occurrences of money laundering and fraud. The Group will verify the source for any payments received in cash which exceeds £5,000. All employees and board members are required to be vigilant for signs of suspected money laundering and should report suspicions of money laundering promptly to the Group's Money Laundering Officer.
32. The Group Company Secretary shall be designated as the Group's Money Laundering Officer and will ensure all legal and regulatory requirements are met in relation to reporting suspected occurrences. Once a suspicion has been reported the reporter must refrain from discussing this matter with any third party whilst Money Laundering Officer establishes factual information.
33. Where necessary, the Money Laundering Officer will make further enquiries about the suspected money laundering and deal with all disclosures about money laundering activity on a confidential basis including any reporting of the activity to the Police.

3.8. Gifts and Hospitality

Receiving Gifts and Hospitality from Third Parties

34. Employees and board members should maintain high standards of propriety and professionalism. This includes avoiding conflicts of interest or situations that may expose them to suspicion of dishonesty.
35. Gifts or hospitality offered by applicants, residents, suppliers, contractors or any third party can place the recipient and the Group in a vulnerable position. Even when offered or accepted in good faith, the intention or motives may be misconstrued by others.
36. Any offer of gifts or hospitality, whether given or received, accepted or declined, must be reported by employees and board members to the Governance Team who will record this in the register of Gifts and Hospitality.
37. Failure to make an appropriate declaration, or the submission of a false declaration in the register, may result in disciplinary action against an employee or a board member.

Gifts

38. The Group's default position is for employees and board members not to accept any gifts. It is recognised that there may an occasion when not accepting a small token gift (for example, flowers or chocolates) would cause offence and in such circumstances accepting a small token gift is permissible but must be recorded as a gift with the Governance Team. However, gifts amounting to a significant monetary value (over £25) must not be accepted.
39. Cash must never be accepted as this may constitute a bribe. Offers of cash must be reported to the Group Company Secretary who will register the offer and action taken.
40. An extravagant gift that has not been possible to decline, for example, if it has been sent directly to an office without a return address, should be passed to the Group Company Secretary who will arrange for it to be recorded in the register. Where it

is possible to contact the sender the Group Company Secretary will seek to return the gift and when this is not possible either because the sender declines the return or cannot be traced the gift will be donated to the Group's nominated charity. The donation will be recorded in the register.

Hospitality

- 41. Hospitality received during the course of business, for example refreshments or lunch during a meeting, is acceptable and does not need to be recorded.
- 42. Other hospitality of modest proportions and in relevant circumstances (for example corporate events lunches or dinners) may be accepted but must be recorded in the hospitality register held by the Governance Team. Lavish hospitality which is not proportionate to either the size or scale of the business hosting the event should never be accepted.
- 43. Employees and board members must not under any circumstances solicit gifts or hospitality, accept any extravagant hospitality or gift, or place themselves under an obligation that might influence or be perceived to influence the conduct of their duties.
- 44. If employees or board members are in doubt about whether to accept hospitality offered, they should refer to their line manager or the Group Company Secretary.

Giving Gifts/hospitality to Third Parties

- 45. Gifts and hospitality, other than refreshments/lunch during a meeting, must not be given on behalf of the Group without prior approval from the Group Chief Executive or Group Company Secretary. In such circumstances the gift or hospitality should not exceed £50 per person per event.

3.9. Conflicts of Interest

- 46. Employees and board members must complete an annual declaration of interests that shall identify any potential conflicts of interests. During the course of the year employees and board members should report any changes in their circumstances which could result in a potential conflict of interests.

3.10. Training

- 47. The Group is committed to providing the training to promote compliance with this policy. All employees and board members are therefore required to successfully complete an annual online training course to demonstrate that they understand the Group's Probity and Anti-Fraud Policy.

4 Legislation and Regulation

48. The relevant legislation and regulatory standards which underpin this policy are:

- Theft Act 1968
- **Public Interest Disclosure Act 1998**
- **Proceeds of Crime Act 2002**
- Fraud Act 2006
- Bribery Act of 2010
- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
- National Housing Federation Code of Governance 2020
- National Housing Federation Code of Conduct 2022 and 2026
- Competency and Conduct Standard 2026

5 Document Control

Responsible Officer/s:	Mike Murphy, Operations Director Governance and Regulation
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Creating homes. Building lives.

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