Anti-Fraud, Anti-Corruption and Anti-Bribery Policy

Version Number	2
Date Applies From	10/09/25
Policy Owner	Executive Director of Governance and Assurance
Next Review Date	10/09/28 (or when substantive legislative changes occur)
Strategy Link	Making the most of our resources

Key Legislation and Regulation:

- Fraud Act 2006
- Bribery Act 2010
- Criminal Finances Act 2017
- Regulator of Social Housing - Governance and Financial Viability Standard
- Economic Crime and Corporate Transparency Act (ECCT) 2023 Offence of 'failure to prevent fraud'

Annual Checks

Policy owners should ensure that an annual check of hyperlinks, roles, and names is undertaken. These checks are in addition to formal review process. Please see Policy and Procedure framework guidance for further details.

If you need this information in an alternative language please call

0161 605 7260

For other formats please call

0300 123 5522

Introduction

The aim of the Policy is to ensure that employees are aware and that ForHousing and its subsidiaries (collectively ForHousing) are compliant with the Fraud Act 2006, Bribery Act 2010, Criminal Finances Act 2017, Economic Crime and Corporate Transparency Act (ECCT) 2023 Offence of 'failure to prevent fraud ‘and the implications that may arise should a breach of legislation be performed by an employee of ForHousing.

It is our policy to conduct all our business in an honest and ethical manner and to require the same approach from our employees, contractors, customers and suppliers. ForHousing takes a zero-tolerance approach to financial malpractice. We are committed to acting professionally, fairly and with integrity in all our business dealings and activities and to putting in place and enforcing systems to adhere to legislation.

ForHousing will uphold all laws relevant to Fraud, countering bribery and corruption in any jurisdiction in which the Group operates.

The aim of this Policy is to:

- Ensure compliance with Regulatory obligations.
- Set out our responsibilities, and the responsibilities of employees, in observing and upholding our position on fraud, bribery and financial malpractice; and
- Provide information and guidance to employees on how to recognise and deal with matters related to fraud, bribery, and all other forms of financial malpractice.

Financial malpractice legislation has created offences punishable with imprisonment for individuals convicted of the most serious offences. If ForHousing are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and our reputation would be damaged. We therefore take our legal responsibilities very seriously.

In relation to this Policy, third party means any individual or organisation employees come into contact with during the course of their work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This Policy applies to all individuals working at all levels and grades, including Board and Committee Members, senior managers, officers, directors, employees (whether permanent, fixed term or temporary), consultants, contractors, trainees, seconded employees, home workers, casual workers and agency employees, volunteers, agents, sponsors, or any other person associated with us, or any of our future subsidiaries or their employees, wherever located.

Definitions

Fraud

This term is used to describe acts such as deception, bribery, forgery, extortion, corruption, theft, embezzlement, misappropriation, false representation, concealment of material facts, collusion, money laundering.

For practical purposes fraud may be defined as the use of deception with the intention of obtaining an advantage, avoiding an obligation, or causing loss to another party. The criminal act is the attempt to deceive, and attempted fraud is therefore treated as seriously as accomplished fraud

The Fraud Act 2006 set out for the first time a legal definition of fraud which identified three classes of fraud, these being:

1) Fraud by false representation
2) Fraud by failing to disclose information
3) Fraud by abuse of position.

Failure to prevent fraud offence: Economic Crime and Corporate Transparency Act 2023

Under the offence, an organisation may be criminally liable where an employee, agent, subsidiary, or other 'associated person', commits a fraud intending to benefit the organisation and the organisation did not have reasonable fraud prevention procedures in place. In certain circumstances, the offence will also apply where the fraud offence is committed with the intention of benefitting a client of the organisation. It does not need to be demonstrated that directors or senior managers ordered or knew about the fraud. The offence will make it easier to hold organisations to account for fraud committed by employees, or other associated persons, which may benefit the organisation, or, in certain circumstances, their clients. The introduction of the offence will drive a major shift in corporate culture to help prevent fraud.

The offence is set out in sections 199-206 and Schedule 13 of the Economic Crime and Corporate Transparency Act 2023.
Additional to the three classes of fraud within the Fraud Act 2006 fraud offences also include.

- Participation in a fraudulent business (section 9, Fraud Act 2006)
- Obtaining services dishonestly (section 11 Fraud Act 2006)
- Cheating the public revenue (common law) [footnote 10]
- False accounting (section 17 Theft Act 1968)
- False statements by company directors (section 19 Theft Act 1968)
- Fraudulent trading (section 993 Companies Act 2006)

Bribery

A bribe is an inducement or reward offered, promised, or provided to gain any commercial, contractual, regulatory or personal advantage.

The six principles of the Bribery Act are:

- Proportionate procedures: The policies and procedures a commercial organisation has in place to prevent bribery should be proportionate to the bribery risks the organisation faces

Procedures should be aligned to the nature, scale and complexity of the organisation's activities, while also being clear, practical, accessible and effectively implemented and enforced.

- Top level commitment: Top-level management should be demonstrably committed to preventing bribery by a person associated with it, fostering a culture within the organisation in which bribery is never acceptable.
- Risk assessment: For any anti-bribery process to be consistently effective, the organisation must assess the nature and extent of its exposure to potential external and internal risks of bribery on its behalf by persons associated with it. The assessment should be periodic, informed and well documented. As business operations change and evolve, so will the risk facing the organisation and it is therefore imperative for regular re-assessment to be undertaken.
- Due diligence: Due diligence procedures must be applied, taking a proportionate and risk-based approach, with regard to the individuals who perform or will perform services for or on behalf of the organisation. This is crucial if identified bribery risks are to be mitigated.
- Communication: Organisations need to ensure that that bribery prevention policies and procedures are embedded and understood throughout the organisation, via both internal and external communication. Communication should include training that is proportionate to the risks the organisation faces.
- Monitoring and review: As an overarching principle, organisations should monitor, and review procedures designed to prevent bribery by persons associated with it and make improvements where necessary.

The Bribery Act creates four categories of offences:

- Offering, promising, or giving a bribe to another person.
- Requesting, agreeing to receive, or accepting a bribe from another person.
- Bribing a foreign public official; and
- The corporate offence of failing to prevent bribery.

Examples:

Offering a bribe

You offer a potential client a ticket to a sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. ForHousing may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept the offer.

Receiving a bribe

A supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in our organisation to ensure ForHousing continue to do business with them. It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribery a foreign official in a country that supplies materials.

You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process.

The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for ForHousing. ForHousing may also be found to have committed an offence.

Facilitation Payments and Kick Backs

ForHousing do not make, and will not accept, facilitation payments or kickbacks of any kind.

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns, or queries regarding a payment you should raise these with your line manager or the Company Secretary.

Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

Donations

ForHousing only make charitable donations that are legal and ethical under the relevant laws and practices. No donation must be offered or made without the prior approval of the Company Secretary or a member of the Executive Management Team or if there is a specific delegation to a particular colleague to enable decisions to be made under specific limits.

Tax Evasion

ForHousing has a zero-tolerance approach towards tax evasion and no activities carried out by the ForHousing will facilitate the evasion of taxes. ForHousing will also take steps to ensure that no partners or affiliated agents carry out such activities. If colleagues become aware of any actions which facilitate tax evasion, they should report suspicions to the Company Secretary.

Scope of Policy

Fraud may be perpetrated by colleagues, customers, consultants, suppliers, contractors, or development partners, individually or with others. Fraud is an ever-present threat to our scarce resources and all colleagues should be alert for signs of fraud and be aware that it is their responsibility to report their concerns to management.

Colleagues should also be alert for signs of fraud and/or financial abuse of customers which should then be reported through the Safeguarding process. Details of this can be found in our Safeguarding Policy

Colleagues are an important element in our stance on fraud and corruption and are required and positively encouraged to raise any concerns they have on these issues. This can be done in the knowledge that such concerns will be treated in confidence and investigated properly and fairly through our fraud investigation process. More information is available in the Whistleblowing Policy.

Members of the public and Board and Committee Members are encouraged to report concerns through our Whistleblowing Policy.

Regulatory Obligations

Irrespective of the amount involved, all cases of proven fraud shall be reported to the police as soon as they are discovered.

As a Registered Provider, the Regulator for Social Housing's Fraud Reporting Guidance for Registered Providers (issued March 2021) places an obligation on ForHousing to:

- As part of an organisation's governance structure, establish a fraud risk management programme, including written policies.
- Undertake a periodic assessment of fraud risk exposure to identify specific potential schemes and events which may require mitigation.
- Establish fraud prevention techniques to mitigate risk.
- Establish fraud detection measures.
- Establish a reporting process to solicit input on potential fraud.
- Ensure a co-ordinated approach for timely investigation and corrective actions.
- Produce an annual report to the Regulator on fraud losses.

ForHousing will fulfil its obligations as outlined above and in line with the Governance and Financial Viability Regulatory Standard.

The ForHousing Chief Executive Officer carries overall responsibility for the prevention of fraud and is liable to be called to account by the Board and the Regulator for specific failures. The fraud register shall be open to inspection by the Regulator at any time and shall be reviewed by the Audit and Risk Committee on an annual basis and reported to the Regulator annually.

Details of any such suspected frauds will be maintained within the fraud register. Operational responsibility for maintaining the fraud register is delegated to the Company Secretary. However, the above responsibilities fall directly onto line management and may involve all board members and colleagues in ForHousing.

Record Keeping

ForHousing must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

All accounts, invoices and other documents and records relating to dealings with third parties, such as clients, suppliers, and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept 'off book' to facilitate or conceal improper payments.

Responsibilities

The Board has overall responsibility for ensuring this Policy complies with our legal and ethical obligations and that all those under our control comply with it. The Company Secretary has primary and day to day responsibility for implementing this Policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it**.**

Boards

The ForHousing Board is responsible for establishing adequate system of internal control and for ensuring that these are regularly reviewed for effectiveness and compliance.

It is acknowledged that there can never be any ‘absolute’ guarantees that internal checks and systems and procedures established will always prevent fraud, corruption or malpractice occurring.

The Code of Conduct notes that it is the responsibility of all members to report details of alleged, detected, suspected, or attempted fraud, corruption and/or malpractice committed by any person.

Audit and Risk Committee (ARC)

The Audit and Risk Committee receives all investigations into fraud allegations and ensures on behalf of the Board that the investigations are thorough, all possible redress has been attempted and the appropriate controls are strengthened. It also reports to the Regulator on any fraud over £5k and inspects the fraud register on an annual basis. ARC is responsible to the board for the effective implementation of this policy**.**

ForHousing Chief Executive Officer and Executive Management Team

The CEO and EMT have a responsibility for preventing fraud through:

- identification of risks to which systems and procedures are exposed.
- developing and maintaining effective internal controls to prevent fraud.
- establishing an environment that promotes compliance with internal controls.
- promoting fraud awareness amongst colleagues.
- fostering an ‘anti- fraud’ culture.
- ensuring that if a fraud or attempted fraud occurs a vigorous and prompt investigation takes place without regard to position held or length of service.
- take appropriate disciplinary and legal action in all cases where justified reviewing systems and procedures to prevent similar frauds arising.

Company Secretary

The Company Secretary has primary responsibility for the implementation and delivery of this policy as well as:

- Reporting Fraud to the Regulator of Social Housing.
- Leading on all Fraud Investigations and deciding best course of investigation.
- Is the main point of contact for reporting a suspicion of Fraud which is related to a Board or Committee Member or a member of EMT.

Senior Management

Under failure to prevent fraud senior managers have a leadership role in relation to fraud prevention their role is to:

- Ensure communication and endorsement of the organisation's stance on preventing fraud, including mission statements
- Ensure that there is clear governance across the organisation in respect of the fraud prevention framework
- Ensure commitment to training and resourcing
- Lead by example and foster an open culture, where colleagues feel empowered to speak up if they encounter fraudulent practices

Line Managers

Line managers are responsible for implementing this Policy in respect of fraud prevention and detection and in responding to incidents of fraud. This involves ensuring that the high legal, ethical and moral standards are adhered to in their area.

The practical requirements of line managers are to:

- Understand the fraud risks in their areas and to consider whether processes under their control might be at risk.
- Have adequate processes and controls in place to prevent, deter and detect fraud, and monitor the same regularly to ensure functioning.
- Be diligent in their responsibilities as managers, particularly in exercising their authority in authorising transactions [electronically or otherwise] such as timesheets, expense claims, purchase orders, returns and contracts.
- To be aware of all key documentation as it relates to areas of high risk e.g., tenancy fraud, IT security and Finance etc.
- Deal effectively with issues raised by colleagues including taking appropriate action to deal with reported or suspected fraudulent activity.
- Report suspected frauds according to the process outlined in this document.
- Provide support/resource as required to fraud investigations.

Managers are responsible for ensuring that colleagues are aware of this policy and procedures and associated documentation relevant to their role.

Your Responsibilities as an Employee of ForHousing

You must ensure that you read, understand, and comply with this Policy.

The prevention, detection and reporting of bribery and malpractice are the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

You must notify your line manager, a Director or the Company Secretary as soon as possible if you believe or suspect that a conflict with this Policy has occurred or may occur in the future. This may happen, for example, if a client or potential client offers you something to gain a

business advantage with us or indicates to you that a gift or payment is required to secure their business.

There are other signs that as an employee you will need to be aware of. These signs are known as 'red flags. Potential 'red flags' that may indicate bribery or corruption are set out in the Anti-Fraud, Anti-Corruption and Anti Bribery Procedure.

If you are unsure whether a particular act constitutes bribery or malpractice, or if you have any other queries, these should be raised with your line manager, a Director, or Company Secretary, in confidence.

Concerns should be reported by following our Whistleblowing Policy.

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for gross misconduct. ForHousing reserves the right to terminate our contractual relationship with any employee if they breach this Policy.

What To Do If You Are a Victim of Bribery or Corruption

It is important that you tell your line manager, a Director, or the Company Secretary or the confidential whistleblowing helpline as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

Protection for Employees

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. ForHousing aims to encourage openness and will support anyone who raises concerns in good faith under this Policy, even if they turn out to be mistaken.

ForHousing are committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your line manager, a Director, or the Company Secretary immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Training and Communication

We recognise that the continuing success of this policy and its general credibility will depend largely on the effectiveness of programmed training and responsiveness of colleagues throughout the organisation.

To facilitate this, induction training for new Board Members and colleagues is mandatory and ongoing refresher courses, particularly for those involved in internal control systems.

Colleague awareness will also be prompted by communicating all changes in policy immediately and reporting to colleagues the outcomes of investigations**.**

Our zero-tolerance approach to fraud, bribery and corruption must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate thereafter.

Equity, Diversity, and Inclusion

We value diversity and work to create an inclusive environment for our customers and colleagues, where everyone has access to the same opportunities. We welcome our responsibility to comply with equalities legislation and regulatory requirements that relate to equity, diversity and inclusion and aim to do more. Through our activities we aim to remove systemic barriers to equal opportunities and eliminate all forms of discrimination, harassment, and victimisation within our organisation.

We are committed to providing excellent customer services, which are fair, equitable and inclusive. As such, we will endeavour to understand and make any reasonable adjustments required for customers in line with ForHousing's Reasonable Adjustment Statement and the Equality Act 2010. Any reasonable adjustment provided will be recorded and kept under active review.

An Inclusive Decision Making Framework document (IDMF) was completed August 2025.

Implementation and Communication

The Policy will be delivered through the existing governance structure and reviewed every three years. The review will ensure that the existing arrangements remain fit for purpose.

Any reported fraud incidents will be investigated in line with the fraud investigation process and all investigations will be led by the Company Secretary.

To ensure the anti-bribery, anti-fraud, anti-corruption process is consistently effective, risk assessments are in place alongside risk registers ensuring the nature and extent of our exposure to potential external and internal risks is captured. The risk assessments are reviewed by the Audit and Risk Committee and Boards to ensure they are reflective of operational change as we evolve.

We have several options which an employee or external source can choose from in order to report fraud or seek advice. These are:

- an internal and external hotline number – 0161 605 7900 (all phone calls will be recorded, and an audio file emailed to the Governance team).
- an internal and external email address: Whistle.Blowing@forhousing.co.uk;
- Whistleblowing notification form on resources
- a dedicated and confidential Company Secretariat email: company.secretary@forhousing.co.uk; and
- a direct telephone number to the Group's internal auditors, Beever & Struthers. smarsh@beeverstruthers.co.uk - (0161 838 1807) lcartwright@beeverstruthers.co.uk - (0161 832 4901)

Monitoring, Recording, Reporting

The Company Secretary will monitor the effectiveness and review the implementation of this Policy annually, regularly considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures should be subject to regular audits to provide assurance that they are effective in counting bribery and corruption.

All employees are responsible for the success of this Policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Related documents

- Code of Conduct.
- Whistleblowing Policy and Speak up Arrangements.
- Disciplinary Policy.
- Grievance Policy.
- Board Member Expenses Policy.
- Finance and Treasury Management Policies.
- Procurement Policy.
- Financial Regulations.
- Right to Buy and Right to Acquire policies.
- Fraud and Whistleblowing Response Plan.
- Anti Money Laundering Policy.

Co-production

The policy was developed in consultation with colleagues. It has been approved by the Audit and Risk Committee which is made up of independent members who are not employees of ForHousing or its subsidiaries.

The EDI EG has advised on the application of this policy, and best practice was sought via an internal audit on the content.

Approval & Review History

With effect from 23/10/24 the approval route for this policy is Executive Management Team – Audit & Risk Committee.

Date	Version	Approved by	Detail
06/11/24	1	ARC	ForHousing templates and language to reflect the collapse of the ForViva Group.
10/09/25	2	ARC	Full review to ensure compliance with Failure to prevent fraud offence: Economic Crime and Corporate Transparency Act 2023. Reviewed by EMT 27/08/25.