Anti-Fraud Policy and Response Plan

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Linked strategies/policies	• Anti-Bribery & Corruption Policy; • Financial Regulations & Standing Orders; • Risk Management Policy; • Whistle Blowing Policy; • Disciplinary Policy; • Safeguarding Policy; • Staff Code of Conduct; • Board Members Code of Conduct; • Staff Induction Pack; and • Contracts of employment, including terms and conditions.
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1. What this policy is for

1.1 This policy explains how we deal with suspected or attempted fraud. It sets out what we expect from you and what happens if fraud is reported or discovered.

1.2 You'll find our full Fraud Response Plan in **Appendix A**.

1.3 We're committed to:

- Reducing fraud - and taking firm action, including disciplinary, civil or criminal steps where needed
- Doing the right thing - we follow the highest ethical standards and have a zero-tolerance approach to fraud
- Working with the right people - we only work with organisations and individuals who share our values and do business with honesty and integrity. We carry out checks where appropriate to make sure anyone working for or with us can be trusted to do the right thing.

1.4 All colleagues are expected to:

- Follow our policies and procedures
- Stick to controls that reduce risk
- Help keep Southway Wythenshawe Homes's reputation safe
- Be vigilant and report concerns

1.5 This policy should be read alongside the Code of Conduct for Colleagues and the Code of Conduct for Board Members.

What we want this policy to do

1.6 This policy is here to help you understand what fraud is, what to look out for, and what happens if fraud is suspected or discovered at Southway Wythenshawe Homes. We want this policy to:

- Be clear about our stance on fraud
- Make sure we're following the law and doing things properly

- Help colleagues and partners understand the risks, spot fraud early, and know how to report it
- Make sure any concerns are taken seriously and handled the right way
- Have a clear process for dealing with suspected fraud
- Take firm, fair action when someone is found to have acted dishonestly

What we mean by fraud

1.7 Fraud is when someone acts dishonestly to gain something for themselves or others, or to cause harm or loss to another person or organisation.

- That includes things like:
- Lying to get money or avoid paying it
- Stealing, bribery or corruption
- Forging documents or signatures
- Hiding or changing important facts
- Misusing data or IT systems
- Working with others to deceive or cheat (collusion)

1.8 In this policy, fraud means any act of dishonesty, whether it's something someone does or fails to do, that's intended to:

- Gain an unfair advantage
- Avoid an obligation
- Cause loss to Southway Wythenshawe Homes or another party

2. Who this policy applies to

2.1 This policy applies to everyone who works with or for Southway Wythenshawe Homes, including:

- All colleagues – whether permanent, temporary, apprentices or trainees
- Volunteers and involved residents
- Contractors, consultants and suppliers
- Business partners and agents acting on our behalf

- Board Members and directors across Southway Wythenshawe Homes and its subsidiaries

2.2 In this policy, we refer to all of the above as 'associated persons'.

3. Regulation and Legal Requirements

3.1 Under the Fraud Act 2006, there are three main types of fraud:

Type of Fraud	Definition
Fraud by false representation	This is when someone lies or gives false information on purpose or without caring whether it's true or not.
Fraud by failing to disclose	This is when someone keeps quiet about something important that they're legally required to share.
Fraud by abuse of position	This is when someone abuses a role of trust - for example, by misusing their position to benefit themselves or someone else, or to cause harm.

3.2 In all three cases, the person must have acted dishonestly and deliberately, with the intent to gain or cause loss, even if the fraud doesn't succeed.

3.3 Offences under the **Fraud Act 2006** occur where the act or omission is committed dishonestly and with intent to cause gain or loss or to expose another to risk of loss. The gain or loss does not have to succeed, so long as the intent is there.

3.4 Whilst these are the fraud offences covered in the **Fraud Act 2006**, there are many other offences that are committed at the same time when a fraud is conducted. There are also civil liabilities for the individuals involved.

3.5 For the purposes of this policy, fraud includes offences under the **Criminal Finances Act 2017**, which makes companies and partnerships criminally liable if a member of their staff or an external agent facilitates tax evasion by a taxpayer, and the organisation failed to prevent that facilitation by way of reasonable prevention procedures. Prosecution could potentially lead to both a conviction and unlimited penalties.

3.6 A further relevant offence under the **Economic Crime and Corporate Transparency Act 2023** is committed by large, incorporated bodies such as Southway Wythenshawe Homes which fail to prevent persons associated with them from committing fraud. In order to reduce the risk of this occurring organisations are expected to ensure they have "reasonable procedures" in place to prevent fraud.

3.7 Southway Wythenshawe Homes expects all colleagues to act appropriately when conducting business on its behalf. We have implemented reasonable fraud prevention procedures, based on the Guidance issued by the Home Office, which sets out the following six underlying principles:

- **Top level commitment** – Southway Wythenshawe Homes's Leadership Team are committed to preventing fraud by all associated persons, and to developing and promoting a culture where fraud is unacceptable.
- **Risk assessment** – We will carry out regular assessments of the nature and extent of exposure to potential risks of fraud by associated persons/partners.
- **Proportionate risk-based prevention procedures** – We will ensure that the fraud prevention procedures implemented are proportionate to the nature, scale, and complexity of Southway Wythenshawe Homes's activities, as well as the specific fraud risks we face. These procedures will be clear, practical, and accessible, and will be effectively implemented, communicated, and enforced across all relevant parts of the Group.
- **Due diligence** – We will ensure appropriate due diligence procedures in respect of persons who perform or will perform services on behalf of Southway Wythenshawe Homes.
- **Communication** – We will ensure that our fraud prevention procedures are embedded and understood throughout Southway Wythenshawe Homes, and to all associated persons, which includes training.
- **Monitoring and review** – We will monitor and regularly review its procedures designed to prevent fraud by associated persons.

More about fraud and the law

3.8 Fraud isn't just about what someone does, it can also be about what they don't do.

3.9 Under the Fraud Act 2006, it's a crime if someone acts dishonestly and deliberately, with the intent to:

- Gain something for themselves or someone else
- Cause a loss or even just risk of loss to someone else
- Fraud doesn't have to be successful. It's the intent that matters
- But that's not the only law that applies.

3.10 Other serious offences that count as fraud include:

3.11 **Criminal Finances Act 2017**

This law makes organisations (like us) criminally responsible if a colleague, contractor or agent helps someone else commit tax evasion and we didn't do enough to stop it. That could mean unlimited fines for Southway Wythenshawe Homes.

3.12 **Economic Crime and Corporate Transparency Act 2023**

This applies to large organisations and says we must prevent fraud by people working with us or for us. To meet this legal duty, we must have reasonable procedures in place to stop fraud before it happens.

3.13 **What Southway Wythenshawe Homes is doing about it**

We've taken steps to reduce the risk of fraud, using national guidance from the Home Office.

3.14 We follow six key principles (explained in section 4) to help protect our organisation, colleagues and community.

3.15 We expect everyone acting on behalf of Southway Wythenshawe Homes to do the right thing and to help us protect our values and reputation.

4. How We Prevent Fraud at Southway Wythenshawe Homes

4.1 We follow national best practice to reduce the risk of fraud. Our approach is built around six key principles:

- **Strong leadership from the top** - Our Leadership Team is fully committed to tackling fraud and building a culture where dishonesty is never acceptable.
- **Regular risk checks** - we regularly look at where we might be vulnerable to fraud—especially in how we work with contractors, partners or anyone acting on our behalf.
- **Proportionate, practical procedures** - Our fraud prevention measures are tailored to fit how we work. They're clear, realistic and focused on the biggest risks—and they're shared across all areas of Southway Wythenshawe Homes.
- **Background checks (due diligence**) - We carry out checks on anyone who provides services for Southway Wythenshawe Homes to make sure they're acting with honesty and integrity.
- **Clear communication and training** - We make sure everyone understands what fraud looks like and what to do if they spot something suspicious. We will provide mandatory induction training, specialist training for those who need it and regular updates.
- **Ongoing monitoring and improvement** - We regularly review our processes to make sure they're still working—and we update them when needed.

What happens if fraud is proven

4.2 Fraud is a serious matter and so are the consequences. Depending on what's happened, the penalties can include:

4.3 **Disciplinary action**

If there's evidence that a colleague has committed fraud, bribery, corruption or money laundering, we'll take action under Southway Wythenshawe Homes's Disciplinary Policy. This could include dismissal.

4.4 **Criminal penalties under the Fraud Act 2006**

Anyone found guilty of fraud in court could face:

1. Up to 10 years in prison
2. An unlimited fine
3. Being personally liable to pay back any money lost due to the fraud

This can apply even if someone knowingly allowed the fraud to happen or ignored it.

4.5 **Criminal Finances Act 2017**

If Southway Wythenshawe Homes is found to have failed to prevent someone from helping others commit tax fraud, we could face an unlimited fine.

4.6 **Economic Crime and Corporate Transparency Act 2023**

Organisations (like Southway Wythenshawe Homes) can be fined without limit if we're found to have failed to prevent certain types of fraud—especially those involving senior managers.

5. Who is Responsible

5.1 Because we all see different parts of how Southway Wythenshawe Homes works, each of us is in a strong position to spot risks in our own area, big or small.

5.2 We all share the responsibility to call out anything that doesn't seem right, and to help reduce the chance of fraud happening in the first place.

5.3 If you think there's a risk of fraud, maybe due to weak processes, gaps in checks, or poor oversight, you must report it to the Executive Director of People & Governance.

5.4 The table below explains who does what when it comes to spotting, preventing, and reporting fraud.

Name	Role
Board	The Board is responsible for making sure Southway Wythenshawe Homes follows this policy and meets its legal and ethical obligations around fraud.
Chief Executive	The Group Chief Executive is responsible for protecting Southway Wythenshawe Homes's assets and making sure we have strong policies and processes in place to reduce the risk of fraud.
Executive Director of People & Governance	The Executive Director of People & Governance leads on managing financial risks at Southway Wythenshawe Homes, including fraud. Their responsibilities include: • Developing a clear picture of where financial risks might arise—including the risk of fraud • Making sure strong financial controls are in place and working as they should • Reviewing our policies to keep them in line with laws on financial crime • Promoting a culture of honesty and openness—encouraging colleagues to speak up if they're worried about something • Working with external investigators when needed, such as the Police, Serious Fraud Office (SFO), National Crime Agency (NCA), HMRC, or Crown Prosecution Service (CPS) If an internal investigation is needed, the Executive Director of People & Governance will: • Appoint someone to lead the investigation • Report the issue to the Chair of the Audit & Risk Committee and the Chair of the Board
Internal and External Audit	If Internal or External Audit becomes aware of any suspected fraud, they will report it straight away to the Executive Director of Finance & Development or the Executive Director of People and Governance. Depending on what they find, they may need to carry out further checks or review systems in more detail. Audit teams, both internal and external, will support any investigation and provide evidence if needed, whether the investigation is being led by Southway Wythenshawe Homes or an outside agency.
People Team	If a colleague is suspected of being involved in fraud, the People Team will work closely with managers and the lead investigator from the very start of the process.

	Their role is to: • Make sure the Disciplinary Policy is followed fairly and consistently • Be involved before any decisions are made about a colleague under suspicion • Support urgent action when needed - such as referral to the police (with advice from the Group Chief Executive) At the recruitment stage, the People Team also: • Carries out checks to confirm qualifications, memberships and professional background • Applies the same checks for temporary and fixed-term colleagues as we do for permanent roles
Managers	Managers play a key role in preventing fraud and setting the tone for their teams. If you're a manager, you must: • Stay alert – keep an eye out for unusual behaviour, transactions or anything that doesn't seem right • Follow procedures – make sure anti-fraud measures are being followed day-to-day • Build the right culture – promote openness, honesty and clear expectations within your team • Make sure your team knows the rules – help colleagues understand fraud risks and what to do if they're concerned If someone in your team raises a concern about possible fraud, don't try to investigate it yourself. Instead: • Listen carefully • Thank them for raising it • Report it immediately to the Executive Director of People & Governance Managers have a clear responsibility to act quickly and pass on concerns—they must not delay or try to resolve it alone.
Line Managers	As a line manager, you're responsible for making sure strong internal controls are in place and working well in your area. That includes paying close attention to teams who work remotely, where the risk of fraud may be higher. While preventing and spotting fraud is a shared responsibility, managers are expected to lead the way. Here's what you need to do: • Make sure your team understands this policy and knows what's expected of them • Identify fraud risks in your area of work and review them regularly

	• Put strong controls in place to reduce risk, this includes: - Clear roles and responsibilities - Supervision and regular checks - Rotating staff in key roles where possible - Separating duties so that no single person has full control over a process - Carrying out spot checks, reconciliations and reviews • Make sure systems and computers are only used for work-related purposes • Understand and follow Southway Wythenshawe Homes's rules on spending, payments and income • Identify roles that carry higher financial risk and manage them carefully • Check that the controls you've put in place are actually being followed • Feed into your director's review of risk and controls in your service area—this helps us build a full picture across Southway Wythenshawe Homes
All Colleagues	Everyone at Southway Wythenshawe Homes has a role to play in protecting what matters—our homes, our money, our information, our reputation, and our community. That includes: • Being honest and fair in everything you do • Following the law and our internal policies on things like expenses, procurement, confidentiality, conflicts of interest, and gifts • Looking after Southway Wythenshawe Homes's assets, whether that's systems, data, money or property—whether you work in the office, out in the community, or remotely You should always: • Avoid anything that could be seen as dishonest or suspicious • Act in a way that shows you're fair, impartial and trustworthy • Stay alert to the fact that others may try to deceive or mislead you Protecting Southway Wythenshawe Homes is everyone's responsibility—not just those working in finance or leadership roles.

6. Reporting Fraud

6.1 If something doesn't feel right, speak up.

6.2 We encourage all colleagues to raise concerns about suspected fraud or wrongdoing as early as possible. Even if you're not 100% sure something counts as fraud, it's always better to check.

6.3 You can raise concerns by:

- Talking to your line manager
- Speaking directly with an Executive Director
- Following the steps in our Whistleblowing Policy
- Asking the Executive Director of People & Governance for advice

You'll be supported for doing the right thing

6.4 We know it can be difficult to raise concerns, especially if you're worried about how others might react. But at Southway Wythenshawe Homes, we support anyone who speaks up in good faith, even if the concern turns out to be a misunderstanding.

6.5 You won't face any negative consequences for doing the right thing.

6.6 We won't tolerate:

- Being treated unfairly
- Being threatened
- Disciplinary action just for raising a concern

6.7 This applies whether you're reporting fraud—or refusing to take part in something unethical.

6.8 If you believe you've been treated unfairly after raising a concern, please speak to the Head of People straight away. If the issue isn't resolved and you're an employee, you can raise it formally using the Grievance Procedure.

7. Monitoring and Reporting

7.1 The Executive Director of People & Governance will continuously monitor the effectiveness and review the implementation of this Policy, regularly

considering its suitability, adequacy and effectiveness in light of both internal and external developments, including but not limited to:

- Incidents of actual or attempted fraud, whistleblowing disclosures or any other relevant matters within the Group
- Emerging sector-specific risks, trends and best practices
- Guidance, priorities or enforcement actions published by any relevant legal, accountancy or regulatory bodies such as the Regulator of Social Housing.

7.2 An annual fraud return will be made to the Regulator of Social Housing.

7.3 This Policy will undergo a formal review at least once every three years, with additional ad-hoc reviews triggered immediately by any changes in applicable legislation, regulation or authoritative guidance that may affect its provisions.

7.4 This Policy does not form part of any employee's contract of employment and it may be amended at any time.

7.5 Southway Wythenshawe Homes will ensure that the Anti-Fraud Policy is accessible to all Board/Committee Members, colleagues and other relevant people.

7.6 The Executive Director of People & Governance is responsible for checking how well this policy is working and for making sure it stays fit for purpose.

7.7 They'll regularly review it based on:

- Any real or attempted cases of fraud
- Whistleblowing reports or other concerns raised
- Changes in the sector, new risks or good practice
- Updates from regulators or professional bodies—like the Regulator of Social Housing

7.8 This policy will be formally reviewed at least every three years. It may be reviewed sooner if there are any major changes in the law or official guidance.

7.9 This policy doesn't form part of anyone's contract, and we may update it at any time.

7.10 We'll make sure it's easy for all colleagues, Board and Committee Members, and anyone working with us to access the latest version.

8. Equality, Diversity and Inclusion

8.1 An Equality Impact Assessment (EIA) was completed September 2026. There were no actions from this.

9. Appendix A: Fraud Response Plan – What Happens When Fraud is Reported

Stage	Action
1. Setting up an investigation	As soon as a suspected fraud is reported, Southway Wythenshawe Homes will decide if an investigation is needed. If so, we'll set up an investigation team, usually made up of: • The Executive Director of Finance & Development or a nominated manager • The Internal Auditor, if appropriate Their first job is to look into the concern discreetly and assess: • Whether controls were bypassed • If fraud may have taken place • How serious the issue is and what impact it might have
2. Taking immediate action (if needed)	The team may need to act quickly to reduce harm or prevent further loss. This could include: • Checking with insurers • Notifying banks or anyone holding Southway Wythenshawe Homes assets • Pausing payments or specific activities • Restricting access for anyone suspected (with HR support) • Suspending signing rights or changing passwords

	• Securing access to systems, records and physical files • Getting legal advice • Informing the Chair of the Group Board and the Chair of the Audit & Risk Committee
3. Who leads the investigation	The Executive Director of Finance & Development will appoint an Investigating Officer. This person should: • Be experienced in fraud investigations • Free from conflicts that could affect objectivity. • Be able to appear in disciplinary hearings or court if needed • Work closely with Finance and HR to gather facts and follow correct procedures If the suspected fraud involves a colleague, the People Team must be involved early, especially if suspension is being considered.
4. Investigation plan	The Investigating Officer will create a plan that covers: • The facts to be established • What evidence is needed • Who to interview and when • Timelines and deadlines • How findings will be assessed and reviewed
5. Purpose of the investigation	The aim of the investigation is to: • Confirm if there is evidence of fraud • Gather enough evidence to involve the police if necessary • Support any disciplinary or legal action, or help recover losses
6. How the investigation is carried out	The Investigating Officer is responsible for gathering all the relevant evidence. They'll: • Lead on interviews (with HR present if staff are involved) • Work with Finance for support on technical or financial issues • Report their findings to the Executive Director of Finance & Development and CEO • They may also need to appear at a disciplinary hearing or court, depending on the outcome.
7. What happens if fraud is confirmed	If fraud (or attempted fraud) is confirmed: • The Executive Director of Finance & Development will inform the Group Chief Executive, the Chair of the Board, and the Chair of the Audit & Risk Committee • The Regulator of Social Housing will be informed if required

	• A full report will be shared with the Board and Audit & Risk Committee • The case will be logged in a central register held by the Executive Director of Finance & Development If the fraud involves the Group Chief Executive or Executive Director of Finance & Development , the concern should be reported to the Chair of the Audit & Risk Committee, who will take over oversight and decision-making.
8. If there's no formal fraud case	If there isn't enough evidence to take the matter to the police, the Investigating Officer will still produce a report explaining why. If a criminal offence may have happened, the Investigating Officer must discuss next steps with the Group Chief Executive and Executive Director Finance & Development. If police involvement is agreed, the Chief Executive or Executive Director Finance & Development will report the case directly to them.
9. Reporting and lessons learned	Once the investigation is complete, the Investigating Officer will produce a final report covering: • What was reported • How it was investigated • What was found • What action was taken • What should change to stop it happening again The Board will: • Review the findings • Make sure any necessary changes are made (like policy updates or extra training) • Monitor how well those changes are working Together with the Executive Director of Finance & Development, the Board will: • Log the case in a central record (to help spot trends over time) • Feed any lessons learned into Southway Wythenshawe Homes's wider approach to risk and governance • Share key updates and outcomes with relevant stakeholders