Plus Dane Housing

Anti-Fraud, Bribery, and Corruption Policy

GOV-POL-05-04

May 2026

Summary

Purpose:

To minimise the threat of fraud by setting out Plus Dane's approach to preventing, identifying and responding to fraud. This include defining the responsibilities of key stakeholders, and referencing the Fraud Response Plan which outlines the actions required when fraud is suspected or identified.

Audience:

All Plus Dane Colleagues

All Plus Dane Board and Committee Members

All Associated Persons acting on behalf of Plus Dane (including contractors, consultants, and agents)

Anti-Fraud, Bribery, and Corruption Policy

Plus Dane Housing

DOCUMENT CONTROL			
1. DOCUMENT INFORMATION			
Role	**Name/Position**		**Date**
Author	Ciara Gregson		April 2026
Approved by	Board		May 2026
Document Reference	GOV-POL-05-04		
2. DOCUMENT STATUS HISTORY			
Version	**Date**	**Change owner**	**Reason for Update**
3	Mar 21	Governance Officer	Appendix 3 updated to reflect online gifts and hospitality register and flow chart added to guide on process
4	Mar 23	Governance and Assurance Manager	Review of policies in line with the framework. Also amalgamated Anti-Fraud and Anti-Bribery and Corruption Policies
5	Mar 26	Governance Manager	Full review of the policy to ensure regulatory compliance with existing legislation and the Economic Crime and Corporate Transparency Act 2023 (ECCTA). Transferred to new policy template.
3. DOCUMENT REVIEW DATE			
Review Due	March 2029 or sooner where there are regulatory changes, new business processes or as a result of a fraud incident or near miss.		
Responsible Officer	Senior Governance Business Partner		
4. CONSULTATION			
Directors, Executive Management Team, Audit and Assurance Committee			
5. DISTRIBUTION			
Name / Department	**Title**		
All Plus Dane Colleagues	Via Intro		
Plus Dane Board and Committee Members	Induction training and shared on iBabs		
All Associated Persons			

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1. Policy Statement

This policy applies to all Plus Dane Board members, colleagues, and any other associated persons acting for or on behalf of Plus Dane. Plus Dane Housing has a zero-tolerance approach to fraud, bribery, and corruption. As such, will not tolerate any form of fraud, bribery, or corruption by its Board members, employees or other associated person.

Plus Dane has a commitment to preventing fraud, bribery and corruption from occurring, and to promoting a culture that supports these standards. Plus Dane is committed to high legal and ethical conduct, and integrity in all business activities. Colleagues are expected to safeguard the resources for which they are responsible, as fraud remains an ever-present threat for all. Anyone associated with Plus Dane who has concerns about potential fraud, bribery or corruption should report their concerns immediately.

This policy outlines our approach to preventing fraud, bribery, and corruption. It should be read alongside Plus Dane's probity policies, including the Anti-Money Laundering Policy, Conflicts of Interest Policy, Gifts and Hospitality Policy, Code of Conduct and Whistleblowing Policy, all available on Intro. In line with the Whistleblowing policy, employees can report concerns with no fear of reprisal.

1.1. Scope of Policy

The scope of this policy encompasses Plus Dane's approach to managing economic crime in all its forms, including instances where the organisation is the victim of fraud as well as the beneficiary. In accordance with the Fraud Act 2006, this policy addresses scenarios where the organisation is targeted by individuals or external bodies for personal gain. At the same time, it fulfils the organisation's legal obligations under the Economic Crime and Corporate Transparency Act 2023 (ECCTA) to prevent associated persons from committing fraud intended to give a business advantage to Plus Dane.

1.2. Legal Framework and Corporate Offences

Corporate criminal liability in the UK ensures that organisations take proactive steps to prevent economic crime. They place the responsibility on Plus Dane to maintain robust governance, controls, and oversight to prevent wrongdoing by employees, subsidiaries, and associated persons.

- **Failure to Prevent Bribery - Bribery Act 2010 (Section 7):** An organisation commits an offence if an employee, subsidiary, agent, contractor, or other associated person offers, promises, or gives a bribe. This is a strict liability offence, meaning the organisation can be prosecuted even if senior management were unaware of the conduct. Plus Dane has a defence if it can be demonstrated that adequate anti-bribery procedures are in place.
- **Failure to Prevent Fraud - (ECCTA 2023):** A corporate offence under Section 199 which applies where a person associated with an organisation commits fraud intending to benefit the organisation or its clients, and the organisation did not have reasonable fraud prevention procedures in place to prevent it.

1.3. Our Commitment

Plus Dane Housing will conduct fraud risk assessments to identify and mitigate areas of vulnerability, in line with Government Functional Standard 013 and ECCTA 2023 requirements. We will implement proportionate, risk-based fraud prevention procedures, tailored to the nature and scale of our operations. To establish a legal defence under the Bribery Act and ECCTA, Plus Dane will maintain:

- Clear policies and procedures
- Regular staff training on fraud and bribery risks.
- Effective risk assessments and robust due diligence on third parties
- Strong reporting and whistleblowing mechanisms
- Ongoing monitoring and quarterly reporting of compliance metrics to the Audit and Assurance Committee.

1.4. Individual Responsibilities

Every Board member, colleague, or other associated person is responsible for maintaining high standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual, and criminal matter and may cause serious damage to the reputation and standing of Plus Dane. In line with the Whistleblowing Policy, employees can make reports of suspicions promptly with no fear of reprisal.

No Board member, colleague, or other associated person may defraud, bribe or otherwise act dishonestly toward Plus Dane, its tenants, customers, contractors, suppliers or partner organisations in anyway.

2. Policy aims

The aim of this policy is to safeguard the resources and reputation of Plus Dane by establishing a robust framework for the prevention, detection, and investigation of suspected or actual fraud, bribery and corruption through:

- **Minimising the Opportunity for Fraud** by setting out a preventative approach, detailing the responsibilities of key stakeholders, and directing colleagues to the Fraud Response Plan for actions when fraud is suspected or identified.
- **Ensuring Regulatory and Legal Compliance** by outlining the key elements of the Bribery Act 2010 and the Economic Crime and Corporate Transparency Act 2023 (ECCTA) and maintaining the statutory standards of “adequate procedures” for bribery and “reasonable procedures” for fraud, as required legal defences under both acts.
- **Promoting an Ethical Culture** by fostering a "zero-tolerance" environment where integrity is at the heart of all business activities and colleagues feel confident reporting concerns without fear of reprisal.
- **Protecting Financial Resilience** by establishing effective controls that mitigate the threat of financial loss, ensuring resources are used as originally intended for our customers and communities.

- **Strengthening Accountability** by ensuring that all instances of fraud, bribery, or corruption are met with vigorous, prompt, and proportionate investigation followed by appropriate sanctions and redress.
- **Strengthening Assurance** by requiring annual fraud, bribery and corruption risk assessments, with outcomes reported to the Governance Manager.

3. Links to Corporate Plan

This policy serves as the golden thread that ensures Plus Dane's resources are protected and utilised to deliver our vision of "Quality homes, great services, vibrant communities" through financial resilience, high performance and robust governance

3.1. **Sustainable Organisation:** this policy is focused on financial resilience and robust governance by actively preventing and detecting fraud to protect our income and asset base. It provides the necessary framework to act in line with our agreed risk appetite, providing assurance to all stakeholders that we are doing what we say we will.

3.2. **Vibrant Communities**: this policy targets tenancy fraud to ensure legitimate access to settled homes, mitigate against negative social impacts on our communities and, safeguards from financial loss to ensure ongoing investment into existing and new homes.

3.3. **Customer and Colleague Experience:** this policy reinforces our values driven culture, ensuring colleagues remain accountable and demonstrate the highest standards of honesty and integrity to make a positive difference for our customers.

4. Key policy definitions

4.1. **Economic Crime and Corporate Transparency Act 2023 (ECCTA): UK** legislation that introduces the corporate offence of failure to prevent fraud. Large organisations may be criminally liable where an associated person commits fraud for the organisation's benefit and reasonable prevention procedures were not in place. A statutory defence applies where the organisation can demonstrate that its fraud prevention framework meets the requirement for "reasonable procedures" as outlined in Home Office guidance.

4.2. **Fraud:** Fraud involves intentionally deceiving a person or organisation to gain advantage, avoid an obligation, or cause loss or the risk of a loss. Under the Fraud Act 2006, fraud can occur through:

- **False Representation:** Knowingly providing false information such as false tenancy applications, false income or employment information, forged documents etc.
- **Failure to Disclose Information:** Withholding information when there is a legal duty to disclose it, such as not reporting household changes, financial, tenant death, conflicts of interest.
- **Abuse of Position:** Using a position of trust dishonestly such as manipulating allocations, falsifying invoices, misusing access to confidential information.

- **Corporate Fraud (ECCTA):** Fraud by an associated person intended to benefit Plus Dane such as improving the organisation's financial position, performance standing or regulatory outcomes. This may include actions like inflating demand forecasts to obtain higher grant funding, falsifying performance data to meet regulatory targets, misrepresenting service outcomes to protect organisational reputation, or manipulating tenancy fraud figures to enhance compliance metrics.

4.3. **The Bribery Act 2010:** UK legislation that creates offences of giving or receiving bribes, bribing foreign officials, and the corporate offence of Failure to Prevent Bribery. Organisations are liable unless they have "adequate procedures" based on six principles: proportionality, top-level commitment, risk assessment, due diligence, communication/training, and monitoring/review.

4.4. **Bribery:** is the offering, giving, requesting, or accepting something of value to improperly influence actions. This includes:

- **Giving a bribe:** such as contractors offering gifts to influence contracts such as a prospective tenant offering payment to influence a letting decision or a supplier giving high-value gifts or paid hospitality to influence procurement scoring or contract renewal outcomes.
- **Receiving a bribe:** an employee accepting payments, gifts, hospitality or other advantages that influence, or could reasonably be perceived to influence, the impartiality of a decision or service outcome.
- **Bribing a foreign public official:** Rare for the Social Housing Sector, this involved unofficial payments to influence overseas processes.
- **Failure of a commercial organisation to prevent Bribery:** Bribery committed by an associated person and adequate procedures were lacking. This may include actions such as bribing staff to bypass quality checks, offering gifts to secure work allocations, or employees giving or receiving bribes for the advantage of the organisation such as improved metrics or avoided compliance failures.

4.5. **Corruption:** Dishonest or improper use of power or position for personal gain or to cause loss to Plus Dane. It may involve employees, Board Members, contractors, suppliers, agents or any associated person. Corrupt conduct includes, but is not limited to, the following:

- **Misappropriation of Funds:** The diversion, misuse or unauthorised use of organisational funds or assets. This includes activities such as diverting payments or refunds for personal benefit, authorising false invoices, or using corporate credit cards or expense accounts for non-business purposes.
- **Undeclared Conflicts of Interest:** Failing to declare personal, financial or family interests that could influence, or appear to influence, decisions. This includes involvement in awarding contracts, approving work, or influencing strategic decisions that benefit connected individuals or organisations.

- **Manipulating Records or System Access:** Altering, deleting or falsifying records, data, compliance results, or system entries to conceal failures, benefit a tenant or associate, or gain an improper advantage. Misusing system privileges to access or disclose confidential information for personal or third-party benefit also constitutes corruption.
- **Corrupt Conduct with Third Parties:** Improper conduct involving suppliers, contractors, partner agencies or other external parties. This includes offering or accepting inappropriate benefits such as excessive gifts, hospitality or preferential services in exchange for favourable treatment, overlooked performance issues, or access to commercially sensitive information or opportunities.

4.6. **PCI DSS (Payment Card Industry Data Security Standard):** A set of security requirements published by the Payment Card Industry Security Standards Council (PCI SSC) for organisations that store, process or transmit payment card data, designed to reduce the risk of cardholder data compromise and fraud.

4.7. **Associated Person:** An individual or entity performing services for or on behalf of Plus Dane, including contractors, consultants, suppliers, agents, agency staff, and subsidiaries.

4.8. **Employee:** Anyone working for Plus Dane in any capacity, including full-time, part-time, casual staff and volunteers.

4.9. **Strict Liability:** For the Failure to Prevent Bribery offence. Plus Dane can be held liable and prosecuted for bribery committed by an associated person. even where senior management were unaware of the conduct.

4.10. **Small Scale Fraud Incidents:** Fraud valued under £1,000, typically opportunistic or low value such as false expense claims, timesheet fraud, minor asset misuse, or isolated tenancy frauds such as non-occupation, false succession etc.

4.11. **Large Scale Fraud Incidents: H**igh-value, systemic or organised fraud intended to secure significant illicit gain. Examples include procurement or supplier fraud, allocation or key-selling collusions, mandate fraud, and large-scale application or Right to Buy fraud involving third-party funding.

5. Roles and responsibilities

5.1. Senior Leadership and Governance

- **Chief Executive Officer:** Responsible for setting the organisational culture for the prevention of fraud, bribery, and corruption, ensuring all staff understand that these risks divert resources from Plus Dane's primary objectives.
- **Deputy Chief Executive Officer (DCEO):** Acts as the policy owner and is accountable for the adequacy of internal control systems. Responsibilities include overseeing the Fraud Register, making arrangements for investigations, and reporting quarterly to the Audit and Assurance Committee

- **Board and Audit and Assurance Committee:** The Board leads by example in promoting integrity. The Committee provides oversight by reviewing quarterly compliance metrics and the annual probity report.
- **Collective Responsibility:** The Board and Executive Management Team will lead by example and will report at least annually on the organisation's anti-fraud, bribery and corruption measures, including progress against risk mitigation actions, compliance metrics and cultural indicators.

5.2. Management Responsibilities

- **Directors:** Must work with teams to identify "at-risk roles" (e.g., procurement, tenancy management) and ensure documented controls, such as annual conflict of interest declarations, are in place.
- **Managers:** Serve as the first line of defence. They must ensure effective internal controls and monitoring arrangements are implemented and maintained within their service areas and report quarterly compliance metrics in line with the assurance framework.
- **Investigation Officer:** A suitably qualified senior staff member responsible for gathering evidence, taking statements, and identifying control weaknesses following an incident.
- **All Plus Dane Staff:** Responsible for acting with propriety in the use of official resources and reporting any suspected dishonest activity immediately via line management or whistleblowing procedures.
- **Company Secretary:** Responsible for determining if a fraud or bribery incident constitutes a "notifiable event" to the Regulator of Social Housing (RSH).
- **Procurement Team:** Responsible for ensuring all suppliers and contractors comply with this policy by including anti-fraud, bribery and corruption clauses in all contracts. They must also carry out proportionate due diligence on new and existing suppliers to assess integrity, compliance and financial standing.
- **Assurance Team:** Responsible for periodically testing the effectiveness of anti-fraud controls and reporting findings to the Audit and Assurance Committee.

6. Our approach

Plus Dane delivers this policy through a structured framework of prevention, identification, investigation and assurance. Our approach is aligned with best practices from the Fraud Advisory Panel and set out in the Code of Conduct.

6.1. Core Principles

The success of our approach is built on the following principles:

- **Zero tolerance:** We do not tolerate any form of impropriety, including tenancy fraud, subletting, or false declarations to obtain housing or Right to Buy benefits.

- **Collective Responsibility:** The detection, prevention, and reporting of fraud, bribery or corruption is the responsibility of all Board members, committee members, and employees
- **Standards of Conduct:** All staff must demonstrate the highest standards of honesty, probity, and integrity, remaining vigilant at all times.
- **Proportionate investigation:** Any allegation will trigger a vigorous, prompt, and proportionate investigation in accordance with the Fraud Response Plan.
- **Gifts and hospitality:** Gifts, hospitality or other advantages must never be offered, given, requested or accepted to influence (or appear to influence) a decision or service outcome. All gifts and hospitality must be declared and recorded in line with the Gifts and Hospitality Policy and the electronic register.
- **Protection of Assets and reputation:** We will safeguard our social housing assets and the public funding we administer to maintain trust and ensure they are used in the best interests of our communities.

6.2. Prevention

Plus Dane will implement a structured, proactive approach to preventing, identifying and managing fraud, bribery and corruption risks. This includes the use of risk assessments, proportionate controls, monitoring mechanisms and ongoing due diligence across all areas of the organisation.

- **Risk Assessments:** We will conduct regular fraud, bribery and corruption risk assessments to identify and mitigate against vulnerable areas, ensuring procedures are proportionate and aligned with Government Functional Standard 013 and ECCTA 2023 requirements.
- **Fraud Prevention Procedures:** We will implement proportionate, risk-based prevention procedures, tailored to the nature and scale of our operations to prevent associated persons from committing fraud.
- **Real-Time Monitoring:** Fraud risk indicators will be developed and embedded into management dashboards for continuous monitoring
- **Due Diligence:** Proportionate due diligence will be conducted on employees, contractors, third parties and other associated persons to ensure they uphold Plus Dane's standards before entering any contract or relationship.
- **Declarations:** All Board Members, Committee Members and employees must complete annual conflict of interest declarations and update these throughout the year as circumstances change. Assurance testing will be undertaken quarterly and reported to EMT
- **Managing At-Risk Roles:** Directors will maintain a quarterly-updated register of roles at heightened risk, such as those in procurement, contract management, and tenancy management and their declared interests.
- **Training and Awareness:** Plus Dane will ensure that all colleagues understand their responsibilities in supporting the organisation's structured approach for prevention, identification and investigation. As part of their induction, all new-starters must read the organisation's probity policies and complete mandatory annual e-learning modules on fraud, bribery and corruption and money

laundering. These modules must also be completed by all staff, with completion rates monitored and reported quarterly to EMT.

To strengthen the prevention and identification elements of the framework, training will be developed for managers to ensure they can confidently assess fraud risks within their service areas, design and maintain effective controls, recognise behavioural, procedural and data-related indicators of potential wrongdoing, and fulfil their responsibilities within the first line of defence. This training will equip managers to lead by example, support early detection, and ensure that controls are consistently applied and reinforced across teams.

Awareness will be reinforced through regular communications, updates on emerging fraud risks, and participation in National Fraud Awareness Week each November. This will ensure that colleagues remain vigilant, understand expected standards of conduct, and feel confident in reporting concerns promptly in support of the organisation's commitment to integrity, accountability and robust fraud prevention.

6.3. Identification

Colleagues must stay alert to signs of fraud, bribery and corruption and recognise when actions fall outside our normal controls or expected behaviours. This may include unexplained changes in behaviour, reluctance to follow standard procedures, avoidance of oversight, irregularities in documentation, inconsistencies in signatures or records, unusual financial trends, repeated "workarounds" that bypass controls, or decisions made outside delegated authority. All suspicions should be taken seriously, whether it is a one-off incident or a recurring pattern of behaviour.

In alignment with the key definitions provided in section 4, risks to the social housing sector include but are not limited to:

- **Tenancy & Benefit Fraud:** Unlawful subletting or continuing to claim benefits while not residing in the property
- **Financial Fraud:** Payroll fraud (fraudulent expenses/overtime) and invoice fraud (fake invoices)
- **Cyber & Data Fraud:** Identity theft, unauthorised access to personal data, or abuse of position to obtain or compromise cardholder data.
- **Procurement and tendering:** Contractors or third parties offering bribes to secure contract awards.
- **Conflicts of interest:** Colleagues offering or allowing preferential treatment through services, repairs or tenancy agreements.

Colleagues must report any concerns within 24 hours directly to the DCEO, Director of Governance and Assurance or by email to fraud@plusdane.co.uk, even where evidence is not yet fully established.

Reports will be handled sensitively and shared only with those who need to know to assess risk, investigate and take action. Where colleagues wish to report confidentially (and anonymously where possible), they may use the Whistleblowing Policy.

6.4. Investigation

Plus Dane will initiate a prompt, thorough and proportionate investigation, in accordance with the Fraud Response Plan to ensure consistency, fairness and timely resolution. Initial fact finding will determine the nature and seriousness of the concern, any immediate risks, and the appropriate escalation route. Lessons learned and identified control weaknesses inform ongoing prevention, risk management and policy review activity.

The DCEO will decide the investigation approach and appoint an Investigation Officer. The People Team and legal advisors will be involved where allegations relate to colleagues' conduct, employment matters, or where legal privilege and litigation risk need to be managed.

External investigators and/or specialist support may be commissioned where independence is required, expertise is needed, or where the allegation involves senior colleagues or presents a significant conflict of interest.

Where initial enquiries indicate escalation is required, reporting must follow the routes below to ensure appropriate oversight:

6.5. Reporting and Escalation:

- **Small-Scale Fraud Incidents:** Formally reported to the Audit and Assurance Committee on a quarterly basis.
- **Large-Scale Fraud Incidents:** The DCEO will notify the Chair of the Audit and Assurance Committee immediately by telephone, and the Committee will be briefed on these matters at the earliest opportunity.
- **Alternative Escalation:** If the concern involves the DCEO, it must be reported to the Chair of the Board, Chair of Audit & Assurance Committee, Chief Executive, or Director of Governance and Assurance (Company Secretary).
- **Tenancy/Benefit Fraud:** Report initially to the Director of Communities, who will lead investigations under the relevant procedures.
- **Fraud Register:** All reports will be recorded promptly in the Fraud Register, maintained and over seen by the DCEO.
- **Regulator Reporting:** Serious Incidents must be reported as soon as they are suspected to allow for proper regulatory oversight to enquiries@rsh.gov.uk. Advised by DCEO and Chair of Audit and Assurance.
- **Other external reporting:** Depending on the nature and severity of the incident, Plus Dane may also report matters to external bodies such as Action Fraud / the National Crime Agency, external auditors, insurers, funders and other regulators, where required or appropriate.

6.6. Sanctions and Redress

Plus Dane will pursue robust and proportionate sanctions in all substantiated cases including internal disciplinary procedures and criminal prosecution in partnership with the Police. We will always seek financial recovery for losses incurred through:

- **Internal Disciplinary Action:** Up to and including summary dismissal.

- **Third parties:** Where a contractor, supplier, agent or other associated person is implicated, Plus Dane may take contractual action including suspension, termination and/or removal from tender opportunities, and may seek recovery of losses and damages.
- **Financial Recovery:** Plus Dane will always seek to recover losses and will obtain legal advice before initiating any of the following actions:
    - **Civil redress:** Recovery of money or assets, including interest and associated legal costs
    - **Confiscation orders** under the Proceeds of Crime Act 2002
    - **Compensation orders**.
    - **Unlawful Profit Orders** (UPO)
- **Reinvestment:** All recovered funds will be returned to Plus Dane for use as originally intended and recorded in the Fraud Register by the Company Secretary.

Any recovery of funds will be recorded in the Fraud Register by the Company Secretary and reported to the Chair of the Audit and Assurance committee on a quarterly and annual basis for transparency.

7. Assurance

Plus Dane will implement and maintain a robust assurance framework to monitor performance and to ensure controls are aligned with strategic, operational and financial risks.

7.1. Performance Monitoring and Reporting:

To ensure high-level oversight and transparency, the following reporting cycles will be implemented and maintained:

- **Quarterly Compliance Reporting:** Management must implement monitoring controls and report compliance metrics quarterly to the Audit and Assurance Committee. This includes periodic checks of financial transactions and supplier activity to detect anomalies early.
- **Quarterly Gift and Hospitality Review:** The DCEO/Company Secretary will review the electronic gifts and hospitality register quarterly and highlight concerns to the Executive Management Team (EMT).
- **Annual Probity Report:** The DCEO/Director of Governance and Assurance will provide an annual report to the Board covering seal register entries, interests, payments/benefits, due diligence activity and all reported instances of fraud or bribery.
- **Regulatory Notifications:** The Company Secretary is responsible for reporting notifiable fraud or corruption events to the Regulator of Social Housing (RSH) within required timelines.

7.2. Lines of Defence:

Our assurance model follows the three lines of defence to provide consistent delivery of anti-fraud standards:

First line Operations	Second line Governance & Assurance	Third line Internal/External Audit
Managers are responsible for identifying risks, implementing internal controls, and conducting regular checks within their service areas.	The Governance and Assurance team maintain the Fraud Register, monitor training completion rates, and provide oversight of policy compliance.	Periodic independent reviews are conducted to test the effectiveness of anti-fraud and anti-bribery controls and the integrity of reporting channels.

7.3. Control Improvements:

We are committed to continuous improvement by:

- Maintaining a robust fraud register that captures every incident and suspected incident
- Documenting and implementing “lessons learned” within 20 working days of an investigation closing.
- Reporting the progress of remedial actions to the Audit and Assurance Committee until they are fully completed and verified

7.4. Policy Review:

Plus Dane will review this policy and all supporting procedures every three years, or sooner in response to regulatory changes, new business processes, emerging risks or the outcome of an incident or near miss.

8. Equality Impact Assessment

The policy is intended to be applied consistently across all colleagues and tenants. No differential impact has been identified, and the approach supports fair and equitable treatment for all individuals, regardless of their protected characteristics.

9. Data Processing Impact Assessment

A DPIA is not required as no new data-processing risks were identified.

10. Modern slavery & human trafficking

There are close links between those perpetrators of fraud, bribery, corruption, and modern slavery / human trafficking. If it appears that there is, or potentially is, colleagues should raise a cause for concern in line with Plus Dane’s Safeguarding Procedure.

11. Legislative and regulatory considerations

This policy has been developed to ensure Plus Dane Housing remains compliant with the following key pieces of legislation and regulatory standards:

11.1. Primary Legislation

- **The Fraud Act 2006:** Provides the legal definitions for fraud committed by individuals through false representation, failing to disclose information and abuse of position.
- **The Bribery Act 2010:** Specifically Section 7, which creates a corporate offence for failing to prevent bribery by an associated person
- **Economic Crime and Corporate Transparency Act 2023 (ECCTA):** Specifically, Section 199, which introduces the corporate offence of "Failure to Prevent Fraud".
- **The Fraud Act 2006:** Providing the legal definitions for fraud by false representation, failing to disclose information, and abuse of position.
- **The Proceeds of Crime Act 2002:** Regarding the recovery of assets and funds obtained through criminal activity.
- **Public Interest Disclosure Act 1998:** Providing the legal framework for whistleblowing and the protection of employees who report concerns

11.2. Regulatory and Functional Standards

- **Government Functional Standard 013 (Counter Fraud):** Sets the expectations for the management of fraud, bribery, and corruption risk across public-benefit organisations
- **Regulator of Social Housing (RSH) Governance and Financial Viability Standard:** Requires an effective risk management and internal controls framework.
- **Money Laundering Regulations:** Setting the standards for due diligence and the reporting of suspicious financial activity.

11.3. Compliance Defence

Plus Dane maintains this policy and associated procedures to establish a statutory defence under both the Bribery Act 2010 and the ECCTA 2023.

12. Links to other Plus Dane policies

- Recruitment and Selection
- Data Protection Policy
- Data Governance Framework
- Anti-Money Laundering Policy
- Conflicts of interest Policy
- Gifts and Hospitality Policy
- Code of Conduct
- Whistleblowing Policy
- Tenancy Management Procedure
- Standing Orders
- Scheme of Delegation
- Financial Regulations
- Procurement Policy
- Terms of Employment
- Disciplinary Policy
- Expenses Policy
- Payroll Policy
- Cyber Security Policy

- Fraud Response Plan
- Digital Data Storage Policy