

A hand is shown in the foreground, pointing towards a miniature model of a house. The house has a dark grey roof, white walls, and a red section on the side with several windows. The background is dark and out of focus, showing another hand in the distance. The overall scene is dramatic and focused on the house model.

# HOUSING FRAUD POLICY

**Freebridge**  
COMMUNITY HOUSING



Housing Fraud Policy			
<b>Last Reviewed</b>	<b>April 2026</b>	<b>Next Review</b>	<b>March 2029</b>
<b>Responsible Officer</b>	<b>Director of Operations</b>		

## Policy Statement

Freebridge take fraud of all natures very seriously and is committed to preventing, detecting, and addressing housing fraud in all its forms.

Social housing is a scarce resource intended to meet the needs of individuals and families who cannot access housing through the open market.

Housing fraud undermines the fairness of the housing allocation system, deprives people in genuine need of homes, and damages public confidence in social housing.

The organisation will take appropriate action where housing fraud is suspected or identified and will ensure that allegations are investigated in an appropriate manner, subject to the requirements of appropriate legislation. If tenancy fraud is identified, appropriate action will be taken, including recovering properties and pursuing enforcement action where necessary.

We will work in partnership with key internal and external stakeholders to prevent housing fraud and will raise awareness amongst staff and the public to recognise the signs of housing fraud and know how to raise any concerns directly to the appropriate Team.

When referring to housing fraud, this includes all types of housing fraud such as, but not limited to housing applications, temporary accommodation fraud and tenancy fraud. Different types of housing fraud will be named separately where necessary to differentiate actions taken against that specific type of fraud.

This policy also supports our [Anti-Fraud, Bribery and Corruption Policy](#).

## Scope

This policy applies to:

- All social housing properties owned or managed by Freebridge.
- All housing applicants.
- All tenants, licensees and occupants.
- Employees and contractors involved in housing services.

## Purpose

The purpose of this policy is to:

- Protect social housing assets from misuse.
- Ensure that homes are occupied by those legally entitled to them.
- Prevent, detect and investigate tenancy fraud.
- Provide a consistent framework for responding to suspected fraud.
- Support compliance with legal and regulatory obligations.

This policy has been written to reinforce Freebridge's zero-tolerance approach to housing fraud. Freebridge seeks to close false housing applications, recover unlawfully occupied homes, recover the financial profit made through illegal subletting and where possible to seek a criminal prosecution (including but not limited to the Prevention of Social Housing Fraud Act 2013, the Fraud Act 2006, the Theft Act 1968 and the Housing Act 1988).

## Equality and Fairness

The organisation will apply this policy fairly and consistently. Investigations and enforcement actions will be undertaken without discrimination.

## Policy Detail

### Types of Housing Fraud

Housing fraud is a term that can describe a range of circumstances where social housing is improperly obtained, misused or wrongly occupied. Housing fraud covers acts of fraud including temporary accommodation and tenancy fraud. Committing housing fraud could lead to Freebridge closing your housing register application, lead you to losing your temporary accommodation, your tenancy, your home, you could be criminally charged, and further actions can be taken against you which is further outlined below.

The following list is not exhaustive, but housing fraud generally falls into one or more of the following categories:

1. Failing to use the property as the main or principal home and failing to notify the landlord which includes
  - a. Abandoning the property, where the tenant lives elsewhere and fails to relinquish the tenancy and return the property to the landlord.
  - b. Unlawfully subletting
  - c. Assigning the tenancy without landlord permission
2. Unauthorised mutual exchange, transfer of tenancy and assignment without permission of the landlord.
3. Tenancy succession by deception, when the legal tenant dies and someone who is not eligible attempts to succeed the tenancy
4. 'Key selling' (where the tenant leaves the property and allows another person to move in unlawfully for profit).

5. Obtaining or attempting to obtain a home using false documents (claiming to be someone else, using forged ID documents, or false statements such as, but not limited to, claiming to be homeless)
6. Obtaining or attempting to obtain a home under false declaration and/or deception of income and/or assets. This includes withholding information, providing false information and/or failing to update your housing register/homelessness application and advise on any change in circumstances, such as changes in family composition, employment status and changes in income, property ownership or benefit claims.
7. Fraudulent Right to Buy or Right to Acquire applications where misleading statements and claims are made to purchase the property via the Right to Buy or Acquire scheme.

## Legal Context

Listed below are the main related legislative documents in tackling housing fraud:

- Prevention of Social Housing Fraud Act 2013
- The Fraud Act 2006
- The Theft Act 1978
- The Housing Act 1985
- The Housing Act 1988
- The Housing Act 1996
- Data Protection Act 2018 and the UK GDPR (as amended by the Data (Use and Access) Act 2025)
- Regulation of Investigatory Powers Act 2000
- Investigatory Powers Act 2016
- Police and Criminal Evidence Act 1984
- The Equality Act 2010

## Strategy

### 1. Prevention

Freebridge will ensure our staff are trained to detect and identify when housing fraud may be committed and how to report it.

We reserve the right to use what feels appropriate to investigate housing fraud or theft committed against the organisation. We will take a balanced and proportionate approach throughout the process. Each incident of housing fraud will be treated on its own merits and circumstances and we will take account of relevant factors including:

- Length of time the fraud has been committed
- Evidence which shows the intent of the person to commit housing fraud
- Any vulnerabilities of the tenant/household involved in the fraud
- Any adverse impact of any action taken against the person committing the fraud or any other unintended consequences

- Any other mitigating circumstances.

We will:

#### Allocations

- Obtain photographs of all customers as part of the identification checks carried out during the sign-up process
- Carry out address history checks
- Verify household composition

#### Tenancy Management

- Contact all new customers within the first month of their tenancy to check residency and ensure we have a full record of all occupants in the property
- Maintain accurate tenancy records including full details of occupants as well as tenants
- Carry out annual tenancy audits via home visit to check occupancy

#### Awareness

- Publicise through corporate communications and social media our zero-tolerance approach to tenancy fraud, and ensure that residents understand how to report concerns

#### Training

- Colleagues and contractors will be trained to identify potential housing fraud and investigation procedures

## 2. Detection

We will:

- Take all reports of housing fraud seriously, all reports will be treated confidentially and investigated thoroughly
- Verify customer details at all relevant points of interaction
- Conduct a 5% residency audit visit check across all stock each year
- Work in partnership with other agencies to share data and validate tenancy details where appropriate

## 3. Tackling Fraud

Freebridge are committed to identifying and preventing housing fraud through proactive measures, including the work of our dedicated teams. Officers may carry out both announced and unannounced visits to properties occupied by homelessness applicants, temporary accommodation residents and all other tenants. The primary purpose of these visits is to:

- Confirm residency

- Identify unauthorised occupants
- Update tenancy records
- Assess maintenance and repair needs
- Evaluate the welfare and wellbeing of household occupants.

In addition, we will:

- Carry out an initial assessment to determine whether a full investigation is required
- Complete detailed home visits and require physical and visual evidence of residency
- Use credit reference agencies to verify household members residency or trace individuals believed to be living elsewhere
- Check evidence of utility usage
- Gather other evidence through documentation verification and data analysis as appropriate
- Liaise with other agencies such as the Police through appropriate data sharing arrangements
- Report all suspicions of fraud to statutory agencies

When concerns regarding potential housing fraud are raised, either internally or externally, they are considered on a case-by-case basis. Allegations are prioritised based on the sensitivity and time-critical nature of the matter, particularly in cases involving:

- succession and right to buy
- mutual exchange
- homelessness applications
- assignment applications

#### 4. Enforcement

Should an allegation be opened into an investigation, this will be recorded on a secure case management system, and we will be regularly updated as the case progresses.

We will

- Take a zero-tolerance approach to housing fraud
- Review all evidence collated of suspected fraud to determine whether an allegation can be substantiated
- Where allegations can be substantiated, and the customer cannot provide an adequate and evidenced explanation, legal action will be taken to recover possession of the property and/or take injunctive action, as well as any relevant financial compensation such as via an Unlawful Profit Order under the Prevention of Social Housing Fraud Act or other legislation as appropriate.
- Seek the recovery of costs incurred due to the fraud, including temporary accommodation costs and pursuing criminal prosecutions where appropriate.
- In enforcement cases we will also work with the Local Authority and/or Police to support criminal prosecutions where relevant

- Refuse applications for The Right to Buy or Right to Acquire in accordance with legislation when housing fraud can be substantiated and therefore it is deemed that the tenant has lost their assured status.
- Reject any fraudulent housing applications
- Reassess eligibility for both temporary and permanent accommodation
- Seek to publicise any action taken as a deterrent to others considering committing housing fraud.

### Unauthorised occupants

We recognise that unauthorised occupants are likely to have been victim to paying increased rent and are put in a vulnerable position once we have gained possession. We will signpost unauthorised occupants to housing advice. We also refer unauthorised occupants who are considered adults at risk to appropriate support services.

### How to report potential housing fraud

Freebridge is committed to investigating all allegations of housing fraud in a timely manner. We will aim to acknowledge all reports of housing fraud within 5 working days where contact details have been provided.

Any concerns relating to housing fraud can be reported in the following ways:

**By phone:** on 03332 404 444

**By email:** [cxsupport@freebridge.org.uk](mailto:cxsupport@freebridge.org.uk)

**In person:** at Freebridge Community Housing, Juniper House, Austin Street, Kings Lynn, Norfolk, PE30 1DZ

Providing contact details aids our investigation but anonymous reports will be respected.

We will respond to reports from various sources including but not limited to residents, councillors, police, internal teams, neighbours and any other relevant persons.

### UK GDPR and the UK Data Protection Act 2018

Freebridge is committed to ensure that all data is:

- Processed lawfully, fairly and in a transparent manner
- Collected for specific and legitimate purpose and not used for anything other than this stated purpose
- Relevant and limited to whatever the requirements are for which the data is processed
- Accurate, and where necessary, kept up to date. Any identified inaccuracies will be amended or removed without undue delay
- Stored for as long as required, as specified within our Data Protection Policy

- Secured with appropriate solutions which protect the data against unauthorised or unlawful processing and accidental loss, destruction or damage.

For further information about our commitment to Data Protection legislation, please see our website at [www.freebridge.org.uk](http://www.freebridge.org.uk)

### **Policy Monitoring and Review**

The organisation will monitor:

- Number of housing fraud cases investigated.
- Properties recovered.
- Enforcement outcomes

Performance information will be periodically reported to senior management and the Board.

This policy will be reviewed at least every three years or earlier if legislative or regulatory changes occur.