

ANTI-FRAUD, BRIBERY & CORRUPTION POLICY

FRAUD



| Anti-Fraud, Bribery and Corruption Policy | | | |
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| Last Reviewed | January 2026 | Next Review | January 2029 |
| Responsible Officer | Company Secretary | | |

Policy Statement: Freebridge is committed to maintaining its reputation as an organisation that demonstrates ethical behaviour and financial probity. Freebridge will not, therefore, tolerate fraud, corruption, bribery or abuse of position for personal gain wherever it may be found in any area of activity. Freebridge shall comply with all relevant legislation to prevent any fraud, corruption and bribery and be alert to any criminal activity.

In line with the Regulator of Social Housing’s guidance, Freebridge defines fraud as “an act of deception, by intent or omission, made for personal gain and/or to damage another person”. Specifically, the Fraud Act 2006 identifies three classes of fraud, these being:

- (1) fraud by false representation;
- (2) fraud by failing to disclose information; and
- (3) fraud by abuse of position.

In addition, the Economic Crime and Corporate Transparency Act 2023 requires large companies to take reasonable steps to prevent fraud or they could be found liable to the offence of failure to prevent fraud.

“Tenancy fraud” falls within this definition; Freebridge has a separate Tenancy Fraud Policy, which should be read in conjunction with this Policy.

The Chief Executive, in consultation with the Company Secretary will determine whether, and when to report any instances of suspected fraud to the Police and/or the Housing Regulator, taking account of the potential risk to the reputation of both Freebridge and the housing sector. If it is determined that a report should be made to the Police and/or the Housing Regulator, the Chair will be informed in advance of the report being made. Any cases of fraud, corruption or bribery that are found to be proven will be entered into Freebridge’s Fraud Register and reported to the Audit and Risk Committee and to the Board. All losses from proven fraudulent activity shall be reported to the Regulator on an annual basis in the form determined by the Regulator.

Freebridge shall take all necessary actions to pursue the recovery of misappropriated assets, except where recovery would not be socially, politically or economically viable.

Policy Detail:

Responsibilities:

The Leadership Team have:

- Responsibility for developing the organisational culture and systems which this document requires to operate effectively and for ensuring it is implemented. Managers are individually and corporately responsible for ensuring that business probity is promoted and that this document is implemented in their areas of responsibility.

Staff, contractors and suppliers have:

- Responsibility to ensure that this document is incorporated into their work-related activities.
- All staff, contractors, and suppliers are expected to demonstrate business probity, both within the organisation, as well as externally.

Tenants & leaseholders:

- All tenants are expected to act in an open and honest manner in their dealings with Freebridge.

We shall:

- Establish the necessary range of policies and procedures for business probity including codes of conduct; complaints; IT security, procurement, disciplinary procedures and communications strategies.
- Ensure our culture is one of integrity where fraud and corruption are strongly opposed and suspicions can be openly raised whilst balancing the need to protect staff from malicious or unfounded allegations.
- Provide specific anti-fraud, corruption and bribery training to relevant staff and will ensure that fraud, corruption and bribery are included within staff, board and Customer Insight Panel/Service Champion induction training.
- Ensure that fraud is identified and managed within the corporate risk map.
- Establish the previous record of prospective employees, including temporary appointments, in terms of their probity and integrity. Employee recruitment must therefore be in accordance with procedures set out in Human Resources policies. Employment offers will only be made subject to written references being obtained for any employed staff. The job application process requires candidates to make us aware of any unspent convictions. Where appropriate, checks will be made through the relevant authority, to determine the suitability of successful job applicants to work with vulnerable groups.

- Maintain Standing Orders and Financial Regulations that must be followed by all employees, Board/Committee Members and Customer Voice Panel Members/Service Champions. Freebridge will maintain systems and procedures, which incorporate efficient and effective internal controls, and internal check procedures.

The Leadership Team will ensure that these controls are properly maintained and are effective. These internal controls will be independently monitored by the Internal Audit Function and by the Business Assurance team and reported to the Audit and Risk Committee as part of the annual Internal Audit Programme and through the Business Assurance Annual Assessment of Internal Control.

- Investigate any suspicions or allegations of fraud, corruption or bribery, the investigation to be undertaken by a member of the Leadership Team or an independent third party as appropriate.
- The investigator will liaise with the Chair of the Audit and Risk Committee and the Internal and External Auditors as appropriate. Additional or specialist support for any investigation will be obtained from the internal auditors. Investigations will be carried out in such a manner as not to compromise any subsequent actions necessary. Where fraud or corruption is discovered, the Chief Executive will decide upon whether the police should be notified. Referral to the police will not prohibit action under disciplinary procedures.
- Any cases of fraud, corruption or bribery that are found to be proven will be entered into Freebridge's Fraud Register and reported to the Audit and Risk Committee and to the Board.
- Details of proven fraud cases will be published to staff and tenants when legally permissible and beneficial.
- Maintain registers of interests of staff, Board/Committee Members, Customer Voice Panel Members and Service Champions, and these will be available for public inspection. This information will be collected on at least an annual basis. Declarations of interest will also be made at Board, Committee Customer Insight Panel and Service Champion meetings where relevant to any items on the agenda and recorded in the minutes of the meeting.

Anti-Bribery

Freebridge will meet the requirements of the Bribery Act 2010.

Freebridge recognises that market practice varies and what is normal and acceptable in one place may not be in another. Freebridge prohibits any inducement which results in a personal gain to the recipient, and which is intended to influence them to take action which may not be solely in the interests of Freebridge or of the person whom they represent.

This should not prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- Normal and appropriate hospitality.
- The giving of a ceremonial gift on a festival or another special time.
- The use of any recognised fast-track process which is available to all on payment of a fee.
- The offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the Company Secretary or a member of the Leadership Team. Freebridge will require its contractors and suppliers to adhere to this approach.

Freebridge has strict procedures in place for the declaration and recording of gifts and hospitality; these are set out in the Employee Handbook, the Board Member Code of Conduct, the Customer Voice Panel Code of Conduct and Service Champions Code of Conduct. The Company Secretary will provide an update at each Audit and Risk Committee meeting on gifts and hospitality declarations

Anti-Money Laundering

Freebridge has separate Anti-Money Laundering Policy and procedures in place.