



TENANCY FRAUD POLICY



Tenancy Fraud Policy			
Last Reviewed	March 2023	Next Review	April 2026
Responsible Officer	Director of Operations		

Policy Statement: Freebridge take fraud of all natures very seriously; Tenancy Fraud affects those most in need of social housing, and therefore preventing the fraudulent use of our housing stock is essential in order to facilitate the delivery our mission and vision. Freebridge will take a considered but robust approach to all cases of proven tenancy fraud.

This policy sets out how we will aim to prevent, identify and address all forms of tenancy fraud. Through this policy and the associated procedures, we will ensure that our employees are knowledgeable and appropriately equipped to identify and tackle tenancy fraud. This policy supports the spirit of our [Anti-Fraud, Bribery and Corruption Policy](#).

This policy covers all Freebridge rented and shared ownership stock.

Policy Detail:

Types of Tenancy Fraud

Tenancy fraud generally falls into one or more of the following categories:

1. Failing to use the property as the sole or principal home which includes
 - a. Abandoning the property
 - b. Unlawfully subletting
 - c. Assigning the tenancy without landlord permission
2. Unauthorised mutual exchange and assignment
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 passes on the keys in return for a one-off lump sum payment or favour).
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 claiming to be homeless)

6. Obtaining or attempting to obtain a home under false declaration of income and/or assets

Strategy

1. Prevention

We will:

- Obtain photographs of all customers as part of the identification checks carried out during the sign-up process
- Make contact with 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
- Work in partnership with other agencies to prevent, investigate and deter tenancy fraud
- Publicise through corporate communications and social media our zero-tolerance approach to tenancy fraud, and ensure that residents understand how to report concerns

2. Detection

We will:

- Take all reports of tenancy fraud seriously and ensure that all reports are investigated thoroughly
- Ensure that all employees who work directly with our customers are briefed on tenancy fraud
- 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

We will:

- Investigate fraud using a wide range of methods
- 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
- Liaise with other agencies such as the Police through appropriate data sharing arrangements
- Report all suspicions of fraud to statutory agencies

4. Enforcement

We will

- Take a zero-tolerance approach to tenancy 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, as well as any relevant financial compensation such as via an Unlawful Profit Order
- In enforcement cases we will also work with the Local Authority to support prosecutions where relevant
- Refuse applications for The Right to Acquire in accordance with legislation when tenancy fraud can be substantiated and therefore it is deemed that the tenant has lost their assured status

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.