



Anti-Fraud, Theft and Corruption Policy

Approval date	January 2026
Approval Level	Board via Audit & Risk Committee
Review Period	3 years
Next Review Date	January 2029
Policy Owner Role Title	Head of Governance and Compliance
Responsible Director	Executive Director, Finance
Is an Equality Impact Assessment (EIA) required?	No
Is a Privacy Impact Assessment (PIA) Required?	No

VERSION CONTROL NOTICE

Always refer to documents stored on the intranet when applying policy and procedure.

If you are viewing this document from your personal drive or as a hard copy, it may not be the latest version.



Contents

1.0	Introduction and scope	3
2.0	Policy Statement.....	3
2.1	Introduction	3
2.2	Preventing fraud.....	4
2.3	Detecting and investigating fraud	4
2.4	Prosecution and Recovery of Losses	5
2.5	Reporting	5
2.6	Information Sharing.....	5
2.7	Fraud Awareness & Training	6
3.0	Roles and Responsibilities	6
4.0	Definitions	7
5.0	Internal Related Documents.....	8
6.0	External Related Documents	Error! Bookmark not defined.
7.0	Legal Framework	9
8.0	Equality & Diversity	10

1.0 Introduction and scope

This Anti-fraud, Theft, and Corruption Policy has been developed in line with Wandle's values, which are:

- Think customer
- Build relationships
- Work together
- Aim high
- Own it

It will ensure that actions we undertake will be underpinned by our vision of:

"Homes to be proud of and services you can trust"

Wandle takes allegations of fraud, theft, and corruption very seriously and is committed to making sure that the public and charitable funds we administer are used correctly. We take a zero-tolerance approach to any criminal financial misconduct, whether it is committed by an employee, contractor, customer, or external party. This policy serves to underline our commitment to an anti-fraud culture and ensure we act in line with the highest standards of probity. This policy also covers prevention of tax evasion in line with the Criminal Finances Act.

Scope

This policy applies to the whole of Wandle and is designed to create a common understanding of the threat from economic crime and what can be done by every Wandle worker. The policy should be read in conjunction with the Tenancy Fraud Policy and the Anti-Bribery Policy.

2.0 Policy Statement

2.1 Introduction

Wandle requires all staff and board members to always act honestly and with integrity and to safeguard the resources for which they are responsible. The purpose of this statement is to set out specific responsibilities with regards the prevention of fraud.

The prevention and detection of fraud is the responsibility of everyone at Wandle. Concerns must be raised when staff reasonably believe that fraud is taking place.

Wandle Staff are encouraged to report any suspicions to their manager, the Head of Governance and Compliance or may make a confidential report in line with the Whistleblowing Policy. No action will be taken against an employee who makes a report that they genuinely believe to be true, even if it turns out to be unfounded. Anonymous reports will be investigated where possible but may be more difficult to progress.

Where we are made aware of a case of fraud, the Head of Governance and Compliance will draw up a plan in line with the approach set out in 2.4 below.

Wandle will take all allegations of fraud seriously and will deal robustly with those who cause or seek to cause a loss to the organisation, in line with our Code of Conduct and Disciplinary Policy.

2.2 Preventing fraud

Wandle considers internal controls to be essential in helping to prevent fraud. Key controls include segregation of duties, declarations of interest, risk management framework, training and awareness and the internal audit programme. These are supported by key policies and procedures including Standing Orders, Whistleblowing and finance policies and procedures. Wandle's Framework for preventing fraud follows the 6 principles of fraud prevention as set out in the government's 'Guidance to organisations on the offence of failure to prevent fraud':

- top level commitment
- risk assessment
- proportionate risk-based prevention procedures
- due diligence
- communication (including training)
- monitoring and review

2.3 Detecting and investigating fraud

All members of staff should assist the Head of Governance and Compliance, when necessary, in conducting enquiries into allegations.

The Head of Governance and Compliance, or other investigating officer is authorised by the Chief Executive to inspect all documents, records and accounts relevant to an investigation held in any form.

Indicators of fraud

Some common signs of fraud to look out for include:

- Abnormal cash payments.
- Unusual patterns of payments to contractors.
- Pressure exerted for payments to be made urgently or ahead of schedule.
- Invoices received for goods or services which have not been received or which appear high cost in relation to the goods or services which have been received.
- Private meetings with contractors or companies hoping to tender for contracts.
- Lavish gifts being offered or received.
- Unusual use of Company Credit Cards.
- An individual who never takes annual leave or time off even if ill, or who insists on dealing with specific contractors personally.

- Making unexpected or illogical decisions regarding projects or contracts.
- Abuse of the decision making process or delegated powers.
- Agreeing contracts which are unfavourable to Wandle either because of the terms or the time period.
- Unexplained preference for certain contractors during tendering period.
- Avoidance of independent checks on the tendering or contracting processes.
- Not following, or attempting to avoid, procedures or guidelines.

2.4 Investigation of Fraud

In high risk cases or where a Wandle worker is suspected of being involved in any of the offences detailed in this policy, the Head of Governance and Compliance will report to an ad-hoc Fraud Review Group. The makeup of this group will be at the discretion of the Head of Governance and Compliance and the head of the Audit & Risk Committee. This group will be formed usually be formed of the Chief Executive, Executive Director, Finance, Head of HR, Head of Governance and Compliance and other Executive Directors or Wandle Staff as appropriate.

Their role will be to determine the scope of the investigation, monitor progress and agree actions required. They will also determine the timing of any reports to the Audit & Risk Committee and Regulator.

2.5 Prosecution and Recovery of Losses

Wandle will always seek to sanction offenders and recover all losses from fraud, where practical. Prosecution will be pursued wherever possible and practical.

2.6 Biennial risk assessment

The Government guidance to organisations on the offence of failure to prevent fraud makes clear that it expects organisations to have conducted a fraud risk assessment.

Wandle will complete a biennial fraud risk assessment to be presented to and approved by the Audit and Risk Committee.

2.7 Reporting

Any corporate fraud cases will be reported to the next Audit & Risk Committee meeting, detailing progress and final decisions on active fraud cases. Where appropriate cases will also be reported to the Regulator and our insurers. Where we suspect a crime has been committed, we will always report this to the police and/or Action Fraud. An annual fraud report is included as an annual standing item to the Audit and Risk Committee and will serve to update the committee on an annual basis on any instances of fraud, as well allowing us to update the committee on any changes to our approach.

2.8 Information Sharing

The Data Protection Policy must always be followed when investigating a case under this policy. The Head of Governance and Compliance will review any requests to share data for the purposes of fraud prevention or detection.

2.9 Fraud Awareness & Training

We will take steps to ensure that Wandle's stance on fraud and corruption is widely publicised within the organisation and all staff are aware of fraud risks. Ensuring that staff are adequately trained on fraud, and fraud prevention are a key control in mitigating the risk of fraud in the business and supporting an anti-fraud culture within the organisation. As part of this suitable training will be provided to staff through e-learning which must be completed by all staff as part of their induction and every two years.

3.0 Roles and Responsibilities

Where fraudulent activity is suspected or established, all Wandle staff are required to refer the matter to the Head of Governance and Compliance for investigation.

Managers, Human Resources and the Head of Governance and Compliance, will work together to ensure that:

- Everyone has an awareness of this policy and an understanding of internal controls which are designed to prevent and detect fraud.
- Staff participate in periodic in-house training programs covering fraud prevention and detection.
- Staff report any suspicions of fraud to their manager, the Head of Governance and Compliance or in line with the Whistleblowing Policy.
- Staff have access to the relevant policies and procedures.

Executive Director, Finance

The Executive Director, Finance is responsible for the proper administration of Wandle's financial affairs.

Head of Governance and Compliance

The Head of Governance and Compliance is responsible for ensuring all fraud allegations are properly investigated and reported to the Audit & Risk Committee and Regulator as appropriate.

The Head of Governance and Compliance is also responsible for

- Investigating allegations of fraud committed against Wandle and where appropriate ensuring appropriate action is taken against any perpetrator
- Arranging for Fraud Awareness training to take place.
- Liaising with law enforcement agencies, solicitors, accountants regarding fraud as necessary.
- Maintain the Fraud Risk Register.
- Approving the Fraud risk assessment.
- Horizon scanning for new fraud risks

Line Managers

Line Managers are responsible for ensuring that staff report any potentially fraudulent activity directly to those responsible for the investigation, without fear of unlawful disclosure or retribution.

All Staff

Individual members of staff are responsible for:

- Their own conduct and for contributing towards the safeguarding of corporate standards (for example declaring any conflicts of interest or private working).
- Acting with propriety in the use of Wandle's resources and in the handling and use of corporate funds, such as when dealing with contractors and suppliers.
- Remaining Vigilant and reporting details immediately to the Head of Governance and Compliance or their line manager (if possible) if they suspect that a fraud has been committed or see any suspicious acts or events.

Audit & Risk Committee

The Audit & Risk Committee are responsible for oversight of this policy, including reviewing reports and monitoring investigations.

4.0 Definitions

Theft

Theft is defined as "to dishonestly appropriate property, belonging to another, with the intention of permanently depriving the other of it."

Fraud

A person can commit fraud through false representation, failing to disclose information and abusing their position.

Fraud by false representation

A fraud will be committed if a person dishonestly makes a false representation and in doing so intends to make a gain or cause loss (or a risk of loss) to another.

For example, where a person dishonestly makes use of a stolen credit card to pay for goods or services.

Fraud by failing to disclose information

A fraud will be committed if a person dishonestly fails to disclose information where there is a legal obligation to do so, with the intention to make a gain or cause loss (or a risk of loss) to another.

An example would be where a person makes an insurance claim for a lost item and receives a payment from the insurer. If they subsequently find the item and do not inform the insurance company, then they have committed an offence.

Fraud by abuse of position

A fraud will be committed if a person occupies a position in which they are expected to safeguard (or not act against) the financial interests of another and they dishonestly abuse that position with the intention of making a gain or cause loss (or a risk of loss) to another.

An example would be leaking confidential information to a rival business.

Examples of Fraud include, but are not limited to:

- Theft of any Wandle property, monies, or assets
- Collusion for personal gain
- Forgery, alteration, or falsification of documents including dishonest claiming of grant monies
- Falsifying expense claims
- Corruption, bribery and influence to pervert outcomes
- Use of Wandle assets/facilities for personal gain
- Procurement fraud
- Destruction or removal of records
- Disclosure of information to third parties for personal gain
- Fraud enabled by identity theft
- Facilitation of tax evasion
- Obtaining housing by deception i.e., succession or subletting fraud, key selling, application fraud, unlawful assignment.

Corruption

Corruption can be defined as dishonest or fraudulent conduct, typically by those in a position of power. It can be committed in many ways but normally involves two or more people entering into a secret agreement.

For the purposes of this policy, where we refer to fraud it also covers theft and corruption as set out in the definitions above.

5.0 Internal Related Documents

Key Strategy	Risk Management
Policies	Tenancy Fraud Anti-money Laundering Data Protection Disciplinary IT Acceptable Usage Information Security Policy

	Whistleblowing Anti-Bribery Policy
Other documents	Code of Conduct, Fraud Risk Assessment

6.0 Legal Framework

Legislation	Main powers and relevance to <i>policy subject</i>
The Bribery Act 2010	Introduced four primary offences in a single piece of legislation: • bribing another person • being bribed • bribery of foreign public officials • failure by a commercial organisation to prevent bribery Under the Bribery Act, an organisation has a defence if it can show that it has adequate bribery prevention procedures in place. The action we take should be proportionate to the risks we face and to the size of our organisation.
Economic Crime and Corporate Transparency Act 2023	Requires organisations such as Wandle to prevent fraud by associated persons, maintain accurate company records, ensure lawful operations, and implement reasonable procedures—such as risk assessments, training, and governance controls—to avoid liability. to the Government has published guidance which sets out procedures that relevant bodies can put in place to prevent persons associated with them from committing fraud offences, and therefore avoid falling foul of the offence of failure to prevent fraud.
The Fraud Act 2006	Deals with the general offence of fraud.
Proceeds of Crime Act 2002	Outlines how any money earned or assets acquired with the proceeds of crime can be recovered.
Criminal Finances Act 2017	Introduces corporate offences relating to the failure of an organisation's agents to prevent the facilitation of tax evasion in the UK or overseas.

Legislation	Main powers and relevance to <i>policy subject</i>
Consumer Credit Regulations	The Financial Conduct Authority (FCA) has specific requirements for regulated firms under the consumer credit regulations to ensure robust fraud prevention and detection measures. This policy, combined with the Anti-Money Laundering, Data Protection, Information Security, and Anti-Bribery Policy helps meet these requirements.

7.0 Equality & Diversity

Equality & Diversity is central to our business; promoting fairness and opportunity for customers and staff; helping provide the best services shaped by and for customers; and right for recruiting and developing our staff.

We are committed to celebrating diversity. To ensure equal access to our services is available, Wandle will comply with the Equality Act 2010 and all other legislative requirements relating to equality. We will work to avoid exclusions or restrictions that are not appropriate to the housing and support needs of our tenants and that may lead to discrimination. We will endeavour to ensure that all tenants receive a consistent level of quality service.

Equality Consideration

Under the *Equality Act 2010* Wandle must consider whether our policies adversely affect our customers and/or staff.

The following table identifies whether this policy disproportionately impacts upon any individuals in regard to the key protected characteristics, as identified in the Act:

Special Characteristic	Any impact? (Yes or No)
age	No
disability	No
gender reassignment	No
marriage and civil partnership	No
pregnancy and maternity	No
race	No
religion or belief	No
sex	No
sexual orientation	No

We do not consider this policy to disproportionately impact any individuals in regard to these characteristics and therefore a detailed Equality Impact Assessment is not required.