

Tenancy fraud policy

This policy sets out Bromford Flagship’s approach to addressing tenancy fraud in support of delivering safe, fair, and responsive services to our customers. It is underpinned by legal duties, regulatory expectations, and a commitment to fairness, accountability, and transparency.

Department	Risk
Policy Owner	Financial Crime and Insurance Manager
Approved Date	November 2025
Date for Review	November 2028
Approving Body	Audit and Risk Committee
Associated Legislation/Regulation	Bribery Act 2010 Criminal Finances Act 2017 Data Protection Act 2018 Economic Crime and Corporate Transparency Act 2023 Fraud Act 2006 General Data Protection Regulations Human Rights Act 1998 Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 Prevention of Social Housing Fraud Act 2013 Public Interest Disclosure Act 1998 Proceeds of Crime Act 2002
Legal Advice From	None required
Equality Impact Assessment Date	22 October 2025
Version Number	1.0
Publication Status	Internal and External

1. Purpose / Principles

Bromford Flagship is committed to preventing tenancy fraud and fostering a culture of honesty, integrity, and transparency. We maintain a zero-tolerance approach to all financial crime and expect all colleagues to act with honesty and always uphold the highest ethical standards to report any concerns about tenancy fraud.

The purpose of this Tenancy Fraud Policy is to safeguard customer homes by preventing, detecting, and responding to reports of tenancy fraud. Tenancy fraud undermines fair access to homes, misuse of resources, and can negatively impact communities.

This policy sets out our commitment to ensure that homes are allocated and occupied in accordance with legal and ethical standards, and:

- We are committed to fair and transparent processes in the allocation and management of tenancies, ensuring that all applicants and customers are treated equitably
- We will proactively identify and mitigate risks of tenancy fraud through robust verification procedures, colleague training, and public awareness
- We adopt a zero-tolerance approach to tenancy fraud and will take appropriate legal and administrative action against those found to be committing or facilitating tenancy fraud
- We will work in partnership with other housing providers, local authorities, law enforcement, and relevant agencies to share intelligence and best practices
- We will regularly review and improve our fraud prevention and detection measures to respond to emerging threats and trends

2. Scope

This policy applies to all Bromford Flagship colleagues, as well as any individuals or organisations with whom we maintain a business relationship, this includes associated persons working for, or on behalf of Bromford Flagship.

This policy forms part of our broader financial crime framework and reinforces our commitment to fostering a workplace culture grounded in integrity, transparency, and ethical conduct. These principles are upheld consistently and without exception across all areas of our business.

3. Roles / Responsibilities

Board has overall responsibility for this policy.

The Board delegate responsibility for this to the Audit & Risk Committee (ARC). ARC has responsibility for the following:

- Reviewing this policy to ensure its continued relevance and effectiveness

- Making recommendations to the Board regarding financial crime risk management and related controls
- Maintaining oversight of financial crime risk management and internal controls
- Approving the annual financial crime workplan and reviewing progress
- Approving the annual report to the Regulator of Social Housing (RSH), including the register of investigated tenancy fraud cases and detailing losses from fraudulent activity

Executive Disclosure Committee (EDC) and Risk and Regulation Group (RRG) are responsible for the following:

- Reviewing periodic reports, financial crime related management information, and monitoring progress against the Financial Crime Workplan, as submitted by the Financial Crime and Insurance Manager

The Financial Crime and Insurance Manager is responsible for:

- Overall responsibility for the coordination and execution of all anti-financial crime activities across Bromford Flagship
- Leading the delivery and communication of financial crime prevention, detection, deterrence, and investigation initiatives, in alignment with the financial crime framework
- Providing regular reports, financial crime related management information, and updates on progress against the financial crime framework

All colleagues are responsible for the following:

- Act in accordance with the principles outlined in this policy
- Demonstrate Bromford Flagship's values and behaviours consistently in their day-to-day activities
- Report immediately any suspicions or evidence of irregular, improper, or behaviours that indicate any form of financial crime
- Exercise propriety and accountability in the use of Bromford Flagship's resources, including the handling of funds and interactions with contractors, suppliers, and customers

4. Policy Content

What is tenancy fraud

Tenancy fraud occurs when an applicant or customer deliberately provides false information or withholds relevant details to obtain or retain a social housing tenancy to which they are not entitled. It also includes the misuse of a property in breach of tenancy conditions. Common types of tenancy fraud include:

- Subletting fraud – where a customer rents out all or part of their home without permission
- Non-occupation fraud – where a customer does not live in the property as their principal home
- False application fraud – where false information is provided during the housing application process

- Succession fraud – where someone falsely claims the right to succeed a tenancy after the original customer has died
- Right to Buy fraud – where false information is used to purchase a property
- Key selling – where a tenant is paid to hand over their keys to someone else
- Abandonment – where a customer leaves the property without formally ending the tenancy, often while continuing to claim housing-related benefits or allowing others to occupy the home unlawfully

Policy commitment

This policy underpins our commitment to ethical conduct and responsible governance by:

- Safeguarding colleagues, customers, third parties, assets, and resources from misuse or misappropriation
- Promoting a culture of honesty, integrity, and accountability across all levels of Bromford Flagship
- Ensuring compliance with legal, regulatory, and contractual obligations, including reporting requirements to the Regulator of Social Housing (RSH)
- Supporting a consistent and initiative-taking approach to tenancy fraud prevention, deterrence detection, investigation and seeking redress

5. EIA statement

An Equality Impact Assessment was undertaken for this policy on 22 October 2025.

We recognise that we may not have identified all adverse impacts on one or more protected characteristics. We welcome any feedback on, or examples of, things that we may have overlooked so that we can continuously improve our policy.

6. Training statement

This policy will be trained out to relevant colleagues by e-learning and who will undertake mandatory training every two years.

7. Measuring Effectiveness

The effectiveness of this policy will be measured through self-assessment and independent scrutiny by periodic internal audit reviews and oversight by Risk and Reporting Group, Executive Disclosure Committee and Audit and Risk Committee.

8. Review Period

This policy will be reviewed every three years by the Financial Crime and Insurance Manager or sooner in response to significant regulatory or organisational changes. Audit and Risk Committee approve it.

FOR INTERNAL USE ONLY –**Supporting documents**

This policy is supported by:

- Equality Impact Assessment

Version Control

Version	Detail	Approved by	Date
1.0	New Bromford Flagship policy	Audit and Risk Committee	November 2025