



Provanhall Housing Association Limited

POLICY
Counter Fraud, Bribery and Corruption Policy

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1. Introduction and Purpose

Provanhall Housing Association (PHA) is committed to conducting its business with honesty, integrity and transparency. This Counter Fraud, Bribery and Corruption Policy sets out PHA's approach to preventing, detecting, reporting and responding to fraud, bribery and corruption and supports the Association's commitment to protecting public funds, tenant trust and its reputation.

The policy brings together PHA's statutory obligations under the Bribery Act 2010 with a broader approach to fraud risk management that reflects the operational realities of a Registered Social Landlord (RSL) operating within a highly regulated environment.

2. Scope

This policy applies to:

- Governing Body members
- All employees, regardless of role or seniority
- Contractors, consultants, agents and suppliers
- Any other persons acting on behalf of PHA

The policy covers all forms of fraud, bribery and corruption, including but not limited to:

- Bribery and inducements
- Procurement and contractor fraud
- Tenancy and housing application fraud
- Payroll, expenses or benefit fraud
- Misuse of assets or information
- Cyber-enabled fraud
- Falsification or manipulation of performance or financial data

3. Definitions

Fraud

An intentional act or omission designed to deceive, resulting in a gain for the perpetrator or a loss to PHA.

Bribery

Offering, giving, requesting, agreeing to receive or accepting a financial or other advantage to induce improper performance of a function or activity.

Corruption

The abuse of entrusted power for private gain.

4. Legal and Regulatory Framework

This policy takes account of relevant legislation and regulatory guidance, including (but not limited to):

- The Bribery Act 2010
- Regulatory Standard 5 of the Scottish Housing Regulator's Governance and Financial Management Standards
- The Scottish Housing Charter
- Relevant employment and criminal legislation

5. Zero Tolerance and Culture

PHA operates a **zero-tolerance approach** to fraud, bribery and corruption. All Board members, staff and associated persons are expected to act fairly, honestly and openly at all times.

The Association recognises that effective counter fraud arrangements rely not only on controls and procedures, but on a positive organisational culture where concerns can be raised without fear of reprisal. PHA is committed to maintaining a **no-blame, speak-up culture**, supported by robust whistleblowing arrangements.

6. Roles and Responsibilities

6.1 Governing Body

The Governing Body is responsible for:

- Setting the tone from the top
- Approving this policy and ensuring it remains fit for purpose
- Receiving assurance on fraud risks and incidents

6.2 Chief Executive

The Chief Executive is accountable for:

- Implementing this policy
- Ensuring appropriate systems and controls are in place
- Reporting material fraud risks or incidents to the Governing Body and regulators where required

6.3 Senior Management Team

Responsible for:

- Embedding fraud prevention controls
- Ensuring staff awareness and compliance
- Monitoring fraud risks within their service areas

6.4 Staff and Associated Persons

Required to:

- Comply with all policies and procedures
- Act with honesty and integrity
- Report suspected fraud promptly

7. Prevention

Fraud prevention is embedded through:

- Clear policies, financial regulations and procurement procedures
- Segregation of duties and authorisation limits
- Role clarity and realistic workloads
- Pre-employment and contractor checks where appropriate
- Proportionate training and awareness activity
- Alignment with Codes of Conduct

8. Detection

Fraud detection is supported by:

- Regular financial and performance reporting
- Management oversight and exception reporting
- Internal audit reviews of higher-risk areas
- Monitoring of trends, anomalies and system alerts
- Tenant and customer feedback mechanisms

9. Reporting and Whistleblowing

All suspected fraud, bribery or corruption must be reported in line with PHA's Whistleblowing Policy. Reports can be made:

- Through line management
- Via confidential reporting routes

PHA will protect individuals who raise genuine concerns from victimisation or retaliation. A central **Fraud and Bribery Register** will be maintained to record reported concerns, investigations and outcomes.

10. Investigation and Response

All allegations will be:

- Taken seriously
- Investigated proportionately, confidentially and fairly
- Handled in accordance with internal procedures

Where fraud or bribery is proven, PHA may take disciplinary action, terminate contracts, recover losses, and refer matters to external authorities as appropriate.

11. Risk Assessment and Assurance

Fraud and bribery risks will be:

- Identified and assessed as part of PHA's wider Risk Management Framework
- Reviewed regularly by management
- Used to inform internal audit planning

12. Training and Awareness

PHA will ensure that:

- Staff and Board members receive appropriate counter fraud training
- Training is proportionate to role and risk exposure
- Awareness is reinforced through induction and periodic refresher activity

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13. Monitoring and Review

The effectiveness of this policy will be monitored through:

- Internal and external audit
- Management reporting
- Board assurance processes

This policy will be reviewed every three years, or sooner where there is a material change in legislation, risk or organisational structure.

14. Related Policies

- Whistleblowing Policy
- Code of Conduct for Governing Body Members
- Code of Conduct for Staff
- Financial Regulations
- Procurement Policy
- Payments, Entitlements and Benefits Policy.