



Anti-Fraud, Bribery, Corruption and Money Laundering Policy





1.0 Introduction

- 1.1 Housing Plus Group ‘the Group’ is committed to maintaining the highest standard of conduct integrity and good governance. We comply with all relevant legislation including the Bribery Act 2010, Proceeds of Crime Act 2002, Terrorism Act 2000, Money Laundering Regulations 2017 and the Economic Crime and Corporate Transparency Act 2023.
- 1.2 We aim to prevent, detect and respond to any form of bribery, corruption, money laundering or fraud (“the Offences”) and ensure that public funds and social housing assets are protected. The Group conducts regular risk assessments and maintains proportionate, risk-based controls and a number of policies, procedures, processes and counter fraud controls are in place to assist in minimising this risk. A Fraud Risk Assessment is completed by the Group’s Internal Auditors to help assist the Group in focusing its priorities to manage these risks.

2.0 Policy Statement


- 2.1 The Group has zero tolerance for any of the Offences. We expect all staff, Board and Committee members, contractors and partners to act honestly, fairly and transparently at all times.
- 2.2 The purpose of this policy sets out expected standards of behaviour, outlines responsibilities, reporting concerns and promotes an open culture where wrongdoing can be raised without fear. Fraudulent actions, misuse of information or any improper advantage will result in disciplinary, civil or criminal action.
- 2.3 Group Financial regulations are in place to ensure compliance with the legislation and regulations relating to money laundering.

3.0 Policy Scope

- 3.1 This Policy applies to all individuals working at all levels within the Group, including but not limited to: Board members, Executive and Non-Executive members (including co-opted members), employees (whether permanent, fixed-term, or temporary) trainees, seconded, casual staff and agency staff, interns, students, volunteers or any person associated to the Group. As well as Contractors, agents and other internal and external stakeholders who have a business relationship with the Group.


4.0 Definitions

- 4.1 **Bribery and Corruption** Offering, giving, receiving, or requesting something of value to improperly influence a decision.

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- 4.2 **Economic Crime and Corporate Transparency Act 2023** introduced a corporate offence of failure to prevent fraud. Under this legislation organisations can be held criminally liable if they fail to prevent fraud committed by an associated person for the organisations benefit, unless they can demonstrate that reasonable prevention procedures were in place.
- 4.3 **Fraud** is the dishonest action intended to make a gain, cause a loss or expose someone to a risk of loss. It includes false representation, failure to disclose information and abuse of position.
- 4.4 **Money Laundering** is concealing the origins of criminal proceeds or facilitating terrorism financing.
- 4.5 **Risk** means the effect of uncertainty on objectives, representing the possibility of events occurring that could positively or negatively impact the achievement of the Group.


5.0 Roles and Responsibilities

- 5.1 Through day-to-day work, staff are in the best position to recognise any specific risks within areas of responsibility. Staff have a duty to ensure that those risks are identified and eliminated. This section outlines the roles and responsibilities of individuals within the Group who can contribute to protecting it by reporting fraud and other irregularities.
- 5.2 **The MLRO** acts as the central point for money laundering reports, reporting suspicious activity to the National Crime Agency and ensuring that any suspicious activities are recorded and colleagues are appropriately trained.
- 5.3 **All staff and those listed at 3.1** must comply with the Group's Policies and Procedures, staying alert to warning signs, acting with integrity and report any suspicions immediately to their manager or the Company Secretary without delay. Any such reports will be dealt with confidentially.
- 5.4 **Managers** will ensure controls and procedures are followed in their areas, monitor for fraud indicators, act promptly on disclosures, and escalate concerns promptly.
- 5.5 **The Audit and Risk Committee** will review and seek assurance regarding the adequacy and effectiveness of internal controls relating to these areas.
- 5.6 **The Group Board** has overall responsibility of ensuring a framework is in place to prevent, detect and manage Fraud.

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- 5.7 **The Group Chief Executive and Executive Management Team** ensure adequate systems of control, resources and cultures are in place. They will ensure a strong anti-fraud culture, allocate resources for fraud risk management, and report significant fraud cases to the Board and Regulators.
- 5.8 **Chief Financial Officer/Company Secretary** oversees frameworks for fraud prevention and internal controls, ensuring serious cases are escalated to the Board and Regulators and will co-ordinate investigations, supported by the Governance and People Services Teams.
- 5.9 **Internal/External Audit** role includes reviewing controls and systems and ensuring compliance with financial instructions. Management has a statutory duty to ensure that the Group has in place adequate arrangements for the prevention and detection of fraud, bribery and corruption. Auditors have a duty to pass on any suspicions of fraud, bribery or corruption to the Audit & Risk Committee and the Group Board.
- 5.10 **The Information and Communications Technology Team** is responsible for implementing and maintaining robust cybersecurity measures to prevent unauthorised access, data manipulation and fraudulent activities.
- 5.11 **External Parties** undertaking work on behalf of the Group are expected to maintain adequate anti-fraud controls and must comply with relevant legal requirements and contractual obligations.
- 5.12 **External Communications** by staff, or any other individual or organisation acting on behalf of the Group, must not communicate with any member of the press, media or another third party about a suspected fraud as this may seriously damage the investigation and any subsequent actions to be taken. Anyone who wishes to raise such issues should discuss the matter with the Executive Management Team.

6.0 Training and Support

- 6.1 Mandatory training is provided to all staff and forms part of induction.
- 6.2 Employees who report fraud will have access to confidential advice and support services, including HR and Governance Guidance.

	Policy Control Sheet Anti-Fraud, Bribery, Corruption, Money-Laundering Policy Policy reference number - 2026/004
Policy Author	Angelina Hicklin Governance Manager
Direct Lead	Suzanne Forster Chief Financial Officer and Company Secretary
Version	v.1 March 2026
Target audience	All those detailed in section 3.1 of this policy.
Consultation	Executive Management Team Audit and Risk Committee
Date of Equality Impact Assessment	No individuals or groups of people are disadvantaged by the adoption of this policy
Date of Data Privacy Impact Assessment	No personal data is processed as part of implementing this policy.
Approving Body	Audit and Risk Committee
Date of final approval	March 2026
Implementation date	March 2026
Monitoring arrangements	Reports of offences will be monitored by the Chief Financial Officer/Company Secretary.
Reporting	Any disclosure will be made to the Audit and Risk Committee -Quarterly
Review date	November 2028
Expiry date	March 2029
Review cycle	Three Year review Cycle
Policy category	Corporate and Governance
Associated policies and procedures	Gifts and Hospitality Policy Whistleblowing Policy Treasury Management Policy Income Management Policy Procurement Procedure Financial Regulations Confidentiality and Data Protection Policy
Policy location	SharePoint Workvivo Housing Plus Group website

Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
Angelina Hicklin Governance Manager – Wrekin	Reviewed in line with policy review cycle and following the RSM Internal Audit on the requirement to prevent Fraud. Combines the legacy policies into one new Policy.	1.00 - March 2026	Audit and Risk Committee – 18.03.26