

**1. STATEMENT OF INTENT**

- 1.1 The purpose of this policy is to ensure that Co-op Committee Members and Co-op Homes staff are aware of the actions that need to be taken in the event of detected attempted or suspected fraud.
- 1.2 By setting out these steps in writing, regulatory authorities will have the comfort of knowing that the Co-op has a clear set of guidelines, which they and Co-op Homes staff must follow.
- 1.3 All Committee Members and Co-op Homes staff are expected to follow the defined procedures for internal control, which help to minimise opportunities for fraud.
- 1.4 This policy complies with the guidance of the Housing Corporation.
- 1.5 Throughout this policy the word 'fraud' is used to include theft, corrupt acts and acts by which people attempt to obtain an advantage dishonestly.

**2. RESPONSIBILITIES OF ALL COMMITTEE MEMBERS AND CO-OP HOMES STAFF**

- 2.1 It is the responsibility of all Committee Members and Co-op Homes staff to report immediately any act of detected, attempted or suspected fraud.
- 2.2 A Co-op Homes employee must report the matter to their Departmental Manager, or if inappropriate, to the General Manager. All notifications may initially be either in person or in writing. The General Manager will determine whether written notification is required.
- 2.3 A Committee Member must report the matter to the Chair and Secretary and if inappropriate to the General Manager who will report the matter to the whole committee.

**3. ACTIONS TO BE TAKEN**

- 3.1 The Departmental Manager must always report the matter to the General Manager. The General Manager will advise the Chair of the Co-op of all frauds and suspected frauds.
- 3.2 Where a Co-op Homes staff member is involved the General Manager, in consultation with the relevant departmental Manager, other officers and professional advisers, as appropriate, will determine how the matter is to be investigated. RHP's Human Resources Department will be consulted, as

appropriate, regarding invoking Co-op Homes' disciplinary procedures.

- 3.3 The General Manager will record the incident in the Fraud Register. This register will be open to inspection by the Housing Corporation. The register will record detected, attempted and suspected frauds and the actions taken. The record will also indicate the systems involved, in order to assist in the prevention of any recurrences.
- 3.4 The General Manager, in consultation with the Co-ops Management Committee will advise the Co-op's lead regulator at the Housing Corporation of all attempted and detected frauds in excess of £1,000 or equivalent in value.
- 3.5 The General Manager is responsible for informing the Co-ops internal and external auditors, insurers and the police as appropriate. The police and external auditors will be informed once there is clear prima facie evidence of fraud.
- 3.6 As required by the Housing Corporation, Co-op Homes will take appropriate action against Co-op Homes staff who perpetrate fraud or seek to perpetrate fraud and any person whose conduct allows fraud to be committed. Co-op Homes will also take action to recover any money that has been lost. The actions taken will be reported to and reviewed by the Co-op Homes Finance & Audit Committee.
- 3.7 As required by the Housing Corporation, the Co-op Management Committee will take appropriate action against Committee Members and any other Co-op members who perpetrate fraud or seek to perpetrate fraud and any person whose conduct allows fraud to be committed. The General Manager or other appropriate officer of Co-op Homes will support the Management Committee in this process. The Co-op will also take action to recover any money that has been lost. The actions taken will be reported to general members of the Co-op at a special general meeting.