

# Anti-fraud policy

This policy makes reference to “Bromford Flagship LiveWest (BFL)” as Flagship Housing Limited (Flagship) is the sole corporate member of Hopestead (and BFL Limited is the parent of Flagship) and, Hopestead is part of the BFL Group. In addition, the Trustees may, from time to time, and so long as it is in the best interest of Hopestead, share resource with Flagship and/or BFL by delegating some of its functions to a team within Flagship and/or BFL. The Trustees have decided that it is in the best interest of Hopestead to delegate some functions in relation to this Policy to the BFL Group Insurance and Financial Crime Manager and the BFL Audit and Risk Committee to ensure an aligned approach across the Group.

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

<b>Department</b>	Hopestead
<b>Policy Owner</b>	Hopestead Director of Operations BFL Group Insurance and Financial Crime Manager
<b>Approved Date</b>	March 2026
<b>Date for Review</b>	February 2029
<b>Approving Body</b>	Hopestead Board
<b>Associated Legislation/Regulation</b>	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 Public Interest Disclosure Act 1998 Proceeds of Crime Act 2002
<b>Legal Advice From</b>	None required
<b>Equality Impact Assessment Date</b>	March 2026
<b>Version Number</b>	3.0
<b>Publication Status</b>	website and intranet

## 1. Purpose / Principles

Hopestead is committed to preventing 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.

## 2. Scope

This policy applies to all confirmed or suspected instances of fraud involving Hopestead 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 Hopestead.

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

Homestead Board has overall responsibility for this policy and holds ultimate accountability for regulatory reporting, even where operational responsibility is delegated.

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

- Reviewing this policy to ensure its continued relevance and effectiveness
- Making recommendations to the BFL Board and Hopestead Board regarding financial crime risk management and related controls
- Maintaining oversight of financial crime risk management and internal controls across the BFL Group
- Approving the BFL Group annual financial crime workplan and reviewing progress
- Approving the BFL Group annual report to the Regulator of Social Housing (RSH), including the register of investigated fraud cases and detailing losses from fraudulent activity

The BFL Group Financial Crime and Insurance Manager is responsible for:

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

All colleagues are responsible for the following:

- Act in accordance with the principles outlined in this policy
- Demonstrate Hopestead'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 Hopestead's resources, including the handling of funds and interactions with contractors, suppliers, and service users.

## 4. Policy Content

### What is fraud

Fraud is defined under the Fraud Act 2006 as a criminal offence involving dishonest conduct intended to result in personal gain or to cause loss (or risk of loss) to another.

Hopstead is committed to investigating all instances of actual, attempted, or suspected fraud, and will take appropriate action to recover any funds or assets lost as a result. This policy reinforces Hopstead's zero-tolerance stance on fraud and ensures that all colleagues understand their role in maintaining a transparent and trustworthy working environment.

### Policy commitment

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

- Safeguarding colleagues, service users, third parties, assets, and resources from misuse or misappropriation
- Promoting a culture of honesty, integrity, and accountability across all levels of BFL Group
- Ensuring compliance with legal, regulatory, and contractual obligations, including reporting requirements to the Charity Commission
- Supporting a consistent and initiative-taking approach to fraud prevention, deterrence detection, investigation and seeking redress

### Examples of fraud

The following is a non-exhaustive list of fraudulent activities:

- Fraudulent applications for employment, including misrepresentation of qualifications, experience, or identity
- Theft or unauthorised use of Hopstead property, assets, or intellectual property
- Forgery or unauthorised alteration of organisational documents, records, or systems.
- Wilful destruction or removal of Hopstead records to conceal misconduct or avoid accountability
- Unauthorised disclosure of confidential or commercially sensitive information, whether for personal gain or to benefit a third party
- Misappropriation or personal use of Hopstead assets, including funds, equipment, or resources
- Acceptance of bribes, kickbacks, or inducements intended to influence decisions or gain unfair advantage
- Submission or approval of false claims or invoices, including inflated or fictitious charges
- Falsified expense or reimbursement claims, such as claiming for non-existent or personal costs
- Diversion or misdirection of funds, including transferring money to unauthorised accounts or purposes
- Knowingly submitting false information to secure funding, contracts, or other incentives, whether for personal gain or to benefit Hopstead improperly

## 5. Reporting

The Charity Commission requires charities to report serious incidents. A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- harm to a charity’s beneficiaries, staff, volunteers or others who come into contact with the charity through its work;
- loss of a charity’s money or assets;
- damage to a charity’s property; or
- harm to a charity’s work or reputation.

For the purposes of this reporting, “significant” means significant in the context of the particular charity, taking account of its staff, operations, finances and/or reputation.

## 6. EIA statement

An Equality Impact Assessment was undertaken for this policy on March 2026.

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.

## 7. Training statement

This policy will be trained out to all colleagues by e-learning to complete mandatory training every two years.

## 8. Measuring Effectiveness

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

## 9. Review Period

This policy will be reviewed every three years by the BFL Group Insurance and Financial Crime Manager or sooner in response to significant regulatory or organisational changes. Any material amendments to this policy will require approval of the Hopestead Board.

### **FOR INTERNAL USE ONLY –**

#### **Supporting documents**

This policy is supported by:

- Equality Impact Assessment

#### **Version Control**

**Note:** minor updates approved by delegated authority increase version number by 0.1; major updates and formally approved versions increase version number by 1.0.

Version	Detail	Approved by	Date
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1.0	First issue	Hopstead Board	May 2022
2.0	Re-formatted into new template, EIA and effectiveness statements added. KPMG contacts updated.	GARC Annual Review	May 2023
2.1	FG internal auditor details updated and changes to align policy and practice updated to reflect FG's policy	GARC Annual Review	May 2024
2.2	References updated following merger between Flagship and Bromford and removal of CEO references.	Delegated authority from Board – 25.02.2025	February 2025
3.0	Updated to align with the Group BFL Anti-Fraud policy	Hopstead Board	March 2026