Eastlight Community Homes

ANTI-FRAUD, BRIBERY & FINANCIAL CRIME POLICY

Owner	Chief Strategy, Governance & Assurance Officer
Directorate	Strategy, Governance & Assurance
Authorising body	Audit & Risk Committee
Resident involvement	No
EIA	Yes
Published	November 2026
Next review	November 2029
Review frequency	3 years (triennial)
Version	V1

Contents

1.	Introduction	3
2.	Scope	3
3.	Statutory & Regulatory Requirements	4
4.	Think Customer	5
5.	Policy Aims & Outcomes	5
6.	Principles	6
7.	Definitions	6
8.	Roles & Responsibilities	8
9.	Fraud & Financial Crime Risk Management	10
10.	Raising Concerns	13
11.	Policy Compliance & Breaches	13
12.	Investigations	14
13.	Reporting & Escalation	15
14.	Equality Impact Assessment	15
15.	Monitoring, Assurance & Review	15

1. Introduction

1.1 Eastlight Community Homes (hereafter 'Eastlight') is committed to conducting all aspects of its business with the highest standards of integrity, honesty, fairness and transparency. We are committed to protecting our residents, assets, reputation, employees, partners and public resources from fraud, bribery, corruption and all forms of financial crime.

1.2 Eastlight adopts a zero-tolerance approach to fraud, bribery, corruption, financial misconduct, money laundering, the facilitation of tax evasion and any other criminal or unethical activity intended to secure improper financial or personal benefit.

1.3 Eastlight will take all reasonable and proportionate steps to prevent, detect, investigate and respond to actual, attempted or suspected incidents of fraud, bribery, corruption and financial crime.

1.4 Where evidence supports doing so, Eastlight will consider and, where justified, pursue disciplinary, contractual, civil, regulatory and criminal remedies, working with law enforcement agencies, regulators and partner organisations as necessary.

1.5 Eastlight is committed to creating a culture where ethical behaviour, accountability, openness and transparency are actively encouraged and where people feel confident raising concerns without fear of retaliation.

1.6 This Policy establishes Eastlight's framework for preventing, detecting, reporting and responding to fraud, bribery, corruption and financial crime.

2. Scope

2.1 This Policy applies to all Eastlight Board and Committee Members, employees, apprentices, agency workers, casual and temporary workers, volunteers, contractors and subcontractors, suppliers, business partners, agents, and any other such persons or organisations providing services on behalf of Eastlight and by our instructions.

2.2 This Policy applies to actual, attempted or suspected fraud, bribery, corruption or financial crime:

- Against Eastlight
- By persons acting on behalf of Eastlight
- Intended to benefit Eastlight or, where relevant, a person to whom services are provided on Eastlight's behalf

- Involving applicants, tenants, residents, leaseholders, shared owners, other customers, former tenants and other third parties
- In connection with Eastlight's homes, activities, services, assets or contractual arrangements.

2.3 Everyone to whom this Policy applies is responsible for helping to prevent, detect and report suspected fraud, bribery, corruption and financial crime in accordance with their role and responsibilities.

2.4 Financial crime includes, but is not limited to, fraud, bribery, corruption, money laundering, tax evasion, the facilitation of tax evasion and other forms of economic crime. Additional requirements relating to money laundering prevention, customer due diligence, sanctions compliance and reporting arrangements are contained within Eastlight's Anti-Money Laundering Policy.

2.5 This Policy should be read alongside the following related policies and procedures:

- Fraud Prevention Framework
- Fraud Response Plan
- Fraud Risk Assessment Guide
- Whistleblowing Policy
- Integrity, Conflicts & Gifts Policy
- Eastlight Code of Conduct
- Declaration of Interest & Work Placement Disclosure Framework & Guide
- Board Conduct Procedure
- Disciplinary Policy and Procedure
- Anti-Money Laundering Policy
- Financial Regulations
- Procurement Policy
- Risk Management Framework.

2.6 This Policy may also be supported by operational procedures, guidance, frameworks, risk assessments and local controls relevant to specific business activities and services.

3. Statutory & Regulatory Requirements

3.1 This Policy is designed to ensure Eastlight meets its obligations under the following statutory and regulatory requirements:

- Bribery Act 2010
- Fraud Act 2006 and Forgery & Counterfeiting Act 1981
- Proceeds of Crime Act 2002

- Theft Acts 1968 and 1978
- Prevention of Social Housing Fraud Act 2013
- Criminal Finances Act 2017
- Economic Crime & Corporate Transparency Act 2023
- Money Laundering Regulations & Sanctions and Anti-Money Laundering Act 2018
- Procurement Act 2023 and Procurement Regulations 2024, and the Public Contracts Regulations 2015 where transitional arrangements apply
- Relevant housing legislation, UK GDPR and Data Protection Act 2018
- Companies Act 2006
- Co-operative & Community Benefit Societies Act 2014
- Regulatory Framework for Social Housing
- Police & Criminal Evidence Act 1984 and Criminal Procedure & Investigations Act 1996, where applicable
- National Housing Federation (NHF) Code of Governance.

4. Think Customer

4.1 At Eastlight, we exist to provide the best possible homes and services for residents.

4.2 Our 'Think Customer' approach aims to guide and support colleagues whenever they make decisions that affect residents, directly or indirectly.

4.3 'Think Customer' ensures our people fully consider how residents will experience and be impacted by the service we provide. Before acting, our people must think about:

- The short and long-term effects of their actions
- The residents' individual needs and preferences
- Whether their communication is clear, respectful and appropriate
- If they can draw on any past insights or experiences to help them when making tough decisions
- Whether they, themselves, would be happy with the service being provided.

4.4 The 'Think Customer' model is designed to complement and work alongside all Eastlight policies and procedures, including this Anti-Fraud, Bribery & Financial Crime Policy.

5. Policy Aims & Outcomes

5.1 The intended aims and outcomes of this Policy are to:

- Prevent fraud, bribery, corruption and financial crime from occurring

- Detect wrongdoing at the earliest possible opportunity
- Protect Eastlight's assets, homes, residents and reputation
- Ensure compliance with legal and regulatory obligations
- Promote a culture of honesty, ethical behaviour and accountability
- Strengthen stakeholder confidence in Eastlight's governance arrangements
- Ensure public resources and social housing assets are managed responsibly and protected from fraud and misuse.

6. Principles

6.1 Integrity

6.1.1 All individuals associated with our organisation are expected to act honestly, ethically and not act to the detriment of Eastlight.

6.2 Accountability

6.2.1 All individuals associated with Eastlight are responsible for acting within their role, reporting actual or suspected wrongdoing to protect Eastlight's assets, resources, residents and reputation.

6.3 Openness

6.3.1 Eastlight promotes an ethical culture in which concerns can be raised, investigated and addressed appropriately, and where individuals can speak up without fear of detriment or retaliation.

7. Definitions

7.1 The definitions contained within this Policy are intended to support understanding of key terms. More detailed definitions, examples and operational guidance are contained within Eastlight's Fraud Response Plan and supporting fraud management arrangements.

7.2 Fraud

7.2.1 Fraud is dishonest conduct intended to make a gain for oneself or another, cause loss to another, or expose another to a risk of loss.

7.2.2 Under the Fraud Act 2006, fraud offences may be committed by:

- False representation
- Failing to disclose information where there is a legal duty to do so
- Abuse of position.

7.3 Tenancy Fraud

7.3.1 Tenancy Fraud is dishonest conduct intended to obtain, retain, use or dispose of social housing to which a person is not entitled.

7.4 Bribery

7.4.1 Bribery is offering, promising or giving financial or other advantage, or requesting, agreeing to receive or accepting such an advantage, to induce or reward improper conduct.

7.4.2 Under the Bribery Act 2010, bribery offences may be committed by:

- Bribing another person
- Being bribed
- Bribing a foreign public official
- The failure of a commercial organisation to prevent bribery.

7.5 Corruption

7.5.1 Corruption is the abuse of entrusted power, authority or position for personal or private gain.

7.6 Financial Crime

7.6.1 Financial Crime is an umbrella term covering fraud, bribery, corruption, theft, money laundering, tax evasion and other dishonest or unlawful activity involving financial gain, loss or misuse of assets.

7.7 Money Laundering

7.7.1 Money Laundering is the concealment, conversion, transfer, acquisition, possession or use of criminal property, or the involvement in arrangements that facilitate these activities.

7.8 Tax Evasion

7.8.1 Tax Evasion is the dishonest evasion of tax lawfully owed to HM Revenue & Customs or another relevant tax authority.

7.9 Facilitation of Tax Evasion

7.9.1 Facilitating Tax Evasion is knowingly and dishonestly assisting another person or organisation to evade tax.

7.10 Material Financial Crime Incident

7.10.1 Material Financial Crime Incidents are the actual, attempted or suspected incident of fraud, bribery, corruption or other financial crime that have, or could reasonably have, a significant organisational financial, operational, legal, regulatory, governance or

reputational effects.

8. Roles & Responsibilities

8.1 Board

8.1.1 The Board is responsible for:

- Maintaining strategic oversight of fraud, bribery and financial crime risks
- Ensuring effective governance, risk management and internal control arrangements
- Receiving assurance regarding the effectiveness of Eastlight's arrangements
- Maintaining oversight of significant incidents
- Upholding Eastlight's standards of probity and financial stewardship.

8.2 Audit & Risk Committee (ARC)

8.2.1 ARC is responsible for:

- Reviewing fraud management and whistleblowing arrangements
- Approving this Policy
- Reviewing the Fraud Register
- Monitoring the effectiveness of controls
- Reviewing significant incidents and lessons learned
- Providing assurance to the Board regarding the effectiveness of Eastlight's arrangements.

8.3 Chief Executive Officer

8.3.1 The Chief Executive is responsible for:

- Demonstrating leadership commitment
- Escalating material Financial Crime Incidents to the Chairs of the Board and ARC at the earliest appropriate opportunity
- Reporting significant incidents where required
- Ensuring adequate resources are available to support Policy implementation.

8.4 Executive Management Team and Leadership Team

8.4.1 The Executive Management and wider Eastlight Leadership teams are responsible for:

- Managing fraud and financial crime risks
- Maintaining effective controls
- Promoting ethical behaviours
- Supporting investigations
- Ensuring policy compliance
- Implementing lessons learned.

8.5 Risk & Assurance Team

8.5.1 The Risk & Assurance Team is responsible for:

- Maintaining the Fraud Register
- Receiving reports of suspected wrongdoing
- Coordinating investigations
- Reporting trends and incidents
- Supporting fraud risk assessments
- Monitoring policy compliance.

8.6 Managers

8.6.1 Eastlight Managers are responsible for:

- Maintaining effective controls
- Promoting awareness
- Identifying and managing risks
- Escalating financial crime concerns promptly
- Supporting investigations and corrective actions.

8.7 Employees, Board Members, Committee Members, Agency Workers & Volunteers

8.7.1 These groups must:

- Act honestly and with integrity
- Protect Eastlight's assets and reputation
- Complete relevant training
- Report financial crime concerns promptly
- Cooperate with investigations
- Comply with associated policies and procedures.

8.8 Contractors, Suppliers, Consultants & Business Partners

8.8.1 These groups must:

- Operate lawfully and ethically
- Maintain appropriate controls
- Cooperate with due diligence and investigations
- Report financial crime concerns relating to Eastlight's activities
- Comply with contractual obligations.

8.9 Residents (Tenants, Leaseholders, Shared Owners & Applicants)

8.9.1 All applicants, residents and tenants must comply with their legal and contractual obligations. They are expected to:

- Act honestly in their dealings with Eastlight
- Provide accurate information

- Notify Eastlight of relevant changes in circumstances
- Report suspected fraud, tenancy fraud, bribery, corruption or financial crime
- Cooperate with investigations where appropriate.

9. Fraud & Financial Crime Risk Management

9.1 Eastlight's approach to preventing, detecting and responding to fraud, bribery, corruption and financial crime is informed by recognised good practice and relevant statutory guidance, including the Economic Crime & Corporate Transparency Act 2023, the Bribery Act 2010 and the Criminal Finances Act 2017.

9.2 Our approach, set out in the Fraud Prevention Framework, is based on the following principles:

- Top-level commitment
- Risk assessment
- Proportionate procedures
- Due diligence
- Communication and training
- Monitoring and review.

9.3 Top Level Commitment

9.3.1 The Chief Executive, Executive Directors and Leadership Team visibly support and sponsor Eastlight's fraud prevention framework, ensuring fraud and financial crime prevention remain a priority across the organisation.

9.3.2 Eastlight allocates proportionate resources to the development, implementation and continuous improvement of its fraud and financial crime prevention arrangements.

9.3.3 Leaders promote a culture of openness, accountability and speaking up, where concerns can be raised and are taken seriously.

9.3.4 Eastlight maintains appropriate oversight of fraud risks, controls and incidents through the Board, ARC and wider Leadership Team, in accordance with the roles and responsibilities set out within this Policy.

9.4 Risk Assessment

9.4.1 Eastlight will maintain a risk-based approach to identifying, assessing and managing fraud, bribery, corruption and financial crime risks.

9.4.2 Risk assessments will be undertaken periodically to identify vulnerabilities, emerging risks and control weaknesses in line with Eastlight's Risk Management Framework and Fraud Risk Assessment Guide.

9.4.3 Particular consideration will be given to risk areas including:

- Procurement
- Development and growth activities
- Recruitment
- Payroll and expenses
- Property services
- Tenancy management, including Right to Buy and Right to Acquire applications
- Supplier payments
- Information security and cyber-enabled threats.

9.4.4 Fraud risk assessments will include consideration of the risk of fraud being committed by employees, agents, contractors, suppliers or other associated persons for the benefit of Eastlight, its residents or other relevant stakeholders.

9.5 Proportionate Procedures

9.5.1 Eastlight will maintain reasonable, proportionate and risk-based procedures designed to prevent fraud, bribery, corruption and financial crime. This includes procedures to prevent an employee, agent, subsidiary or other associated person committing fraud intended to benefit Eastlight or, in relevant circumstances, its clients.

9.5.2 Further details are included within the Fraud Prevention Framework and Fraud Response Plan.

9.6 Tenancy Fraud Prevention & Response

9.6.1 Eastlight will take reasonable and proportionate action to prevent, detect and tackle tenancy fraud, protect scarce social housing and ensure homes are occupied by those entitled to do so.

9.6.2 Controls may include identity, eligibility and occupancy checks before letting, and at appropriate points during a tenancy, including succession, assignment, mutual exchange, Right to Buy, Right to Acquire, and other changes in occupation or tenancy rights.

9.6.3 Eastlight may undertake lawful data matching and work with Local Authorities, Police, credit reference agencies and specialist investigators.

9.6.4 Where fraud is established, Eastlight may take tenancy enforcement, possession, civil

recovery or criminal referral action, taking account of the evidence, individual circumstances, safeguarding and relevant considerations.

9.7 Tax Evasion Prevention

9.7.1 Eastlight will maintain arrangements to prevent the criminal facilitation of tax evasion, adopting a zero-tolerance approach towards such activity. These arrangements will be aligned to the principles established within the Criminal Finances Act 2017.

9.8 Gifts, Hospitality & Conflicts of Interest

9.8.1 Gifts and hospitality, and any actual, potential or perceived conflicts of interest, must be declared, approved and recorded in accordance with Eastlight's Integrity, Conflicts & Gifts Policy, Gifts & Hospitality Guidance, and Declaration of Interest & Work Placement Disclosure Framework & Guide.

9.8.2 Gifts or hospitality must not be offered or accepted where they are intended, or could reasonably be perceived, to influence a decision improperly.

9.8.3 Individuals must not participate in decisions where a conflict has not been appropriately declared and managed.

9.9 Due Diligence

9.9.1 Due diligence will be undertaken on a proportionate and risk-based basis to support the prevention of fraud, bribery, corruption and other financial crime risks in relation to suppliers, contractors, consultants, agents, business partners, associated persons and other parties performing services for or on behalf of Eastlight.

9.9.2 Where appropriate and proportionate, Eastlight may require contractual provisions relating to fraud prevention, bribery prevention, financial crime compliance, cooperation with investigations, audit rights and compliance with relevant Eastlight policies and procedures.

9.10 Training & Awareness

9.10.1 Employees, Board and Committee Members and other relevant persons will receive appropriate anti-fraud, bribery and financial crime training at induction and periodically thereafter.

9.10.2 Enhanced, role-specific training will be provided for higher-risk activities. Completion will be monitored and non-completion will be addressed through appropriate management arrangements.

9.10.3 Eastlight will make sure there is sufficient communication and awareness related to this Policy and fraud and financial crime risk, and that all those in scope of this Policy

have a full understanding of their responsibilities and obligations.

9.10.4 This Policy forms part of our mandatory training suite and is subject to regular awareness raising campaigns.

10. Raising Concerns

10.1 Anyone who suspects fraud, bribery, corruption or financial crime should report it promptly through Eastlight's fraud reporting arrangements, including the online fraud reporting form, dedicated reporting mailbox (fraud@eastlighthomes.co.uk), our Customer Services Team or, where appropriate, the Whistleblowing Policy. Details of current reporting routes are available on Eastlight's website and intranet.

10.2 Concerns may be reported confidentially and, where circumstances permit, anonymously. Individuals raising concerns in good faith will be protected from retaliation in accordance with Eastlight's Whistleblowing Policy.

10.3 Eastlight will provide accessible reporting channels and handle information confidentially as far as the law allows.

10.4 Alternative reporting routes are available in instances where the concern involves the person who would normally receive the report or where the individual does not feel comfortable reporting through normal management channels.

10.5 Detailed reporting arrangements and reporting routes are set out within the Fraud Response Plan and Whistleblowing Policy.

11. Policy Compliance & Breaches

11.1 Compliance with this Policy is mandatory for the individuals and organisations listed in Section 2.1.

11.2 Applicants, tenants, residents and other customers remain subject to their legal and contractual obligations.

11.3 Failure to comply with this Policy may result in appropriate action being taken by Eastlight, including:

- Informal management intervention
- Additional training or corrective action
- Removal from Board or Committee responsibilities
- Referral to regulators
- Referral to law enforcement agencies

- Any other action considered reasonable and proportionate in the circumstances.

11.4 Any employee found to have committed, facilitated or knowingly concealed fraud, bribery, corruption or other financial crime may be subject to disciplinary action up to and including dismissal, in addition to any civil, regulatory or criminal proceedings.

11.5 Any contractor, supplier, consultant, agent or business partner found to have committed, facilitated or knowingly concealed fraud, bribery, corruption or other financial crime may be subject to contractual remedies, contract termination, exclusion from future procurement opportunities and any other lawful action considered appropriate.

11.6 Eastlight reserves the right to pursue recovery of losses, damages, costs and other remedies arising from breaches of this Policy wherever it is lawful, proportionate and cost-effective to do so.

11.7 Eastlight may make a claim under its insurance arrangements in fraud cases. Whilst an insurance claim may be lodged, it is anticipated that this would only be pursued once all other avenues of recovery have been fully explored.

11.8 There is a Commercial Crime Protection Policy for insurance against crime in place. The Policy excludes 'a past knowledge of fraud' and, in order for claims to be accepted under the Policy, written notice of a crime must be given as soon as reasonably possible after discovery and in no event later than 60 days after discovery.

11.9 Deliberate, malicious or knowingly false allegations made in bad faith may themselves constitute misconduct and may be dealt with under the appropriate policies and procedures.

12. Investigations

12.1 All concerns will be assessed and, where appropriate, investigated proportionately in accordance with Eastlight's Fraud Response Plan.

12.2 Investigations will be authorised, independent where necessary and undertaken by suitably competent people.

12.3 Evidence and personal information will be obtained, recorded, retained and shared lawfully and in accordance with applicable legal, regulatory and data protection requirements.

12.4 Eastlight may work with the Police, Local Authorities, regulators, insurers and specialist investigators where appropriate.

12.5 Media enquiries relating to investigations must be referred to the Communications & External Affairs Team.

12.6 Safeguarding, accessibility and other types of witness-support needs will be considered throughout the investigation process.

13. Reporting & Escalation

13.1 Suspected, attempted and actual incidents of fraud, bribery, corruption and other financial crime will be recorded in Eastlight's Fraud & Financial Crime Register in accordance with the relevant reporting and escalation arrangements.

13.2 Money laundering and sanction-related matters will be managed in accordance with Eastlight's Anti-Money Laundering Policy and may also be recorded and reported through Eastlight's financial crime governance arrangements where appropriate.

13.3 The number and nature of fraud and financial crime reports will be recorded, monitored and reported periodically to management to support oversight, identify trends and assess the effectiveness of controls.

13.4 The Audit & Risk Committee will review the Register periodically, and the Board will receive an annual report.

13.5 Material incidents will be escalated promptly to the Chief Executive and the Chairs of the Board and Audit & Risk Committee, with incidents reported to regulators or law enforcement agencies where required.

13.6 Reporting will cover losses, action taken, control weaknesses, improvement actions and relevant trends. Detailed reporting, escalation and notification arrangements are set out within Eastlight's Fraud Response Plan.

14. Equality Impact Assessment

14.1 An Equality Impact Assessment (EIA) for this Policy was conducted, and no impacts have been identified.

15. Monitoring, Assurance & Review

15.1 Eastlight's arrangements for preventing fraud, bribery, corruption and financial crime will be subject to ongoing monitoring, assurance and review.

15.2 Assurance may be obtained from:

- Internal Audit
- External Audit
- Fraud risk assessments
- Management control self-assessments
- Investigation outcomes
- Fraud Register reviews
- Compliance monitoring activities
- Regulatory inspections
- Independent external reviews.

15.3 The Audit & Risk Committee and Board will receive appropriate assurance regarding the effectiveness of Eastlight's financial crime control framework.

15.4 Eastlight will undertake root cause analyses following significant incidents of fraud, bribery, corruption or financial crime.

15.5 Corrective actions will be implemented to address identified weaknesses and reduce the likelihood of recurrence.

15.6 Lessons learned from investigations, audits and assurance reviews will be used to strengthen Eastlight's prevention framework and support continuous improvement.

15.7 This Policy and relevant procedures will be reviewed at least every three years, following a significant incident, or sooner where legal, regulatory or organisational change requires it.

Eastlight Community Homes
Eastlight House, Charter Way
Braintree
Essex
CM77 8FG

0330 128 0330
www.eastlighthomes.co.uk
customer.services@
eastlighthomes.co.uk

eastlighthomes
eastlighthomes
@eastlighthomes
eastlight-community-homes-

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