

Probity & Anti Fraud Policy

Jigsaw

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1 Aims of Policy

1. The Group is committed to the highest standards of probity, openness and accountability in all of its affairs and takes a zero tolerance approach to fraud in all its forms:
 - theft or deception
 - bribery
 - corruption
 - money laundering
2. The Group is determined to nurture a culture of honesty and integrity and is resolute in its commitment to support those who come forward to express concerns by providing them with assurance that they can do so without fear of reprisal or victimisation.

2 Fraud

3. Fraud can be described as an act of deception, by intent or omission, which is made for personal gain or to cause a loss to another party regardless of whether the gain or loss actually occurs. The Fraud Act 2006 identifies three classes of fraud:
 - false representation - lying about something using any means, e.g. by words or actions;
 - failure to disclose information - not saying something when you have a legal duty to do so;
 - abuse of position - abusing a position where there is an expectation to safeguard the financial interests of another person or organisation.
4. Examples of fraud include an employee or tenant representative claiming for expenses that have not been incurred and an applicant for housing not disclosing their true circumstances in order to be granted a tenancy. (The latter example would be dealt with under the Group's Tenancy Fraud Policy).

3 Employees

5. All employees must abide by the Group's code of conduct and be aware of the policies and procedures relevant to their areas of work. Employees should:
 - act with propriety with the use of the Group's resources;
 - be aware of the potential risk and signs of fraudulent activity recognising that such activity can take place at any level within the organisation;

- feel able to challenge or question any unusual activity or transaction;
- not be dissuaded from reporting, actual or potential fraud as the Group is committed to supporting those who raise legitimate concerns.

4 Reporting Fraud

6. Any activity not in line with the Group's Financial Regulations may be fraudulent and all board members and employees shall familiarise themselves with the content of those regulations. Annual training is provided by the Group on the Financial Regulations.
7. Should a board member or employee become aware of any fraudulent or apparently fraudulent activity or possible theft, misappropriation or misuse of the Group's finances or assets by an employee, tenant or contractor (or anyone in receipt of monies or assets from the Group) or any breach of the Group's Financial Regulations, they shall report this immediately to their line manager, who shall report this to the relevant Executive Director.
8. *The relevant Executive Director shall decide whether or not an apparent fraud or possible theft is to be reported to the police. Where a decision is taken not to report the matter to the police, the reasons for this and the date the decision was taken shall be recorded.*
9. Should the relevant person not be available, or if that is the person about whom the employee has concerns, then the employee should speak to the relevant Executive Director.
10. Any concerns raised by an employee concerning a suspected breach shall be treated in strictest confidence.
11. Any breach of the Group's Financial Regulations may be treated as a disciplinary matter.
12. Any failure to report any concerns in respect of a suspected breach of the Group's Financial Regulations may also be treated as a disciplinary matter.
13. Board members should report any concerns to the Group Company Secretary.
14. The Group Company Secretary will maintain a theft and fraud register and report on a quarterly basis to Risk and Audit Committee any actual or attempted fraudulent activity. The Risk and Audit Committee shall, in its quarterly review of entries in the fraud register, seek assurances from officers and/or make recommendations to the Group or subsidiary boards as appropriate as to changes in policies and working practices.
15. The Group Chief Executive shall be responsible for making external reports of fraud, as required by regulation or insurance requirements.

5 Bribery

16. Bribery is a criminal activity under the Bribery Act 2010 and can be defined as ‘offering, promising or giving someone a financial or other advantage to induce them to, or reward them, for improper performance of their functions or activities and includes where it is known or believed that the acceptance of the advantage in itself constitutes improper performance. It also includes asking for or agreeing to accept a bribe.’

6 Reporting Bribery

17. Where an employee suspects a bribe has been given, received or offered, they shall report this immediately to their line manager, who shall report this to the relevant Group/Executive Director. Should the relevant person not be available, or if that is the person about whom the employee has concerns, then the employee should speak to the relevant Group/Executive Director.
18. Where a board member suspects a bribe has been given, received or offered, they shall report it to the Group Company Secretary, unless their concern relates to the Group Company Secretary, in which case they shall report it to the Group’s Internal Auditors.
19. Any individual or company offering a bribe shall immediately be debarred from any further transactions or employment with the Group.
20. Any board member or employee who offers or accepts a bribe will face disciplinary action which could lead to dismissal/disqualification as appropriate.

7 Gifts and Hospitality

21. Genuine hospitality or similar business expenditure that is reasonable and proportionate to the business will not be caught by the Act. However, gifts and hospitality could also be seen as a means of exerting improper influence over or compromising the Group’s activities and decisions.

8 Receiving Gifts and Hospitality from Third Parties

22. Board members and employees must not under any circumstances solicit gifts or hospitality or accept any extravagant hospitality or gift or place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties.
23. Small token gifts of an appropriate nature (e.g. diaries, pens, calendars, flowers, chocolates) and up to a value of £25 may be accepted by a board member or employee, provided that this does not exceed an annual limit of £100 from any one organisation or person. Gifts of significant monetary value (above £25) must not be accepted. Cash

must never be accepted. Offers of cash must be reported to the Group Company Secretary who will register the offer and action taken. Offers of cash may constitute bribes.

24. Hospitality received during the course of business, e.g. refreshments or lunch during a meeting, is perfectly acceptable and need not be recorded. Other hospitality of modest proportions and in relevant circumstances (e.g. corporate events, lunches or dinners) may be accepted. Lavish hospitality which is not proportionate to the size/scale of the business hosting the event should never be accepted.
25. Where it has not been possible to decline an extravagant gift, eg. if it was sent direct to the Company's offices, it should be passed to the Group Company Secretary who will arrange for it to be recorded in the register and donated to a charitable cause.

9 Giving Gifts and Hospitality to Third Parties

26. Gifts and hospitality, other than refreshments/lunch during a meeting, must not be given on behalf of the Group without prior approval from the Group Chief Executive or Group Company Secretary. In such circumstances the gift or hospitality should not exceed £50 per person per event.
27. Hospitality or entertainment specifically for employees, board members or involved residents should not exceed £50 per person for an individual event, with an overall limit of £250 per person per year.
28. Any offer of gifts or hospitality (whether given or received, accepted or declined) must be reported by board members and employees to the Group Company Secretary and recorded in the register of Gifts and Hospitality which is maintained by the Governance team.
29. Failure to make an appropriate declaration or the submission of a false declaration in the register may result in disciplinary action against an employee or removal of a board member.

10 Conflicts of Interest

30. Board members and employees shall complete an annual declaration of interests that shall identify any potential conflicts of interests.

11 Money Laundering

31. Money laundering is a criminal offence under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017. The Group takes measures to be vigilant against all occurrences of money laundering and fraud. It prevents itself and its employees group-wide being exposed to opportunities of money laundering by ensuring as follows:

- where any payments in excess of £5,000 are accepted in cash, a detailed record is obtained of the source of the funds;
 - based on the information obtained, to highlight possible occurrences of suspected money laundering;
 - that all employees to be vigilant for signs of suspected money laundering; and
 - all employees who suspect potential money laundering must report it promptly to the Money Laundering Officer and not discuss it with any other person, including after having reported it.
32. The Group Company Secretary or their nominated representative shall be designated as the Group's Money Laundering Officer and he/she shall ensure all legal and regulatory requirements are met in relation to reporting suspected occurrences.
33. The Money Laundering Officer will where necessary make further enquiries about the suspected money laundering and deal with all disclosures about money laundering activity on a confidential basis including any reporting of the activity to the police.

12 Whistle Blowing

34. Where employees feel unable or unwilling to take up a concern with their immediate line manager, they should contact an appropriate Director or Executive Director. Where disclosure to a Director or Executive Director is felt to be inappropriate then employees should contact the Group Chief Executive or failing that, the Chair of the Risk & Audit Committee.
35. Individuals are encouraged to put their name to an allegation. Anonymous concerns, although less powerful, will be still be considered and investigated at the Group's discretion.
36. This policy is intended to provide board members and employees with a mechanism for raising concerns about fraudulent and other unacceptable activity in relation to financial conduct.
37. Should the methods described or the outcome of an investigation prove unsatisfactory, board members or employees may contact the Group's Internal Auditors:
38. TIAA, Artillery House, Fort Fareham, Newgate Lane, Fareham, PO14 1AH
39. T: 0845 300 3333

13 Training

All board members and employees shall be required to successfully complete an annual online training course to demonstrate that they understand the Group's Fraud Policy.

Responsible officer	Brian Moran, Deputy Chief Executive & Group Company Secretary Richard Houghton, Director of Operations
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Approved by	Group Board
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Reviewed and Approved by	Executive Management Team
To be reviewed every	Two years



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