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# Anti-Fraud, Anti-Bribery, Anti-Money Laundering, & Anti-Corruption Policy

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## 1. Document Overview

<b>Purpose</b>	To ensure Thrive is protected as far as is reasonably practice, from acts of fraud, corruption, bribery, and money laundering.		
<b>Audience</b>	Colleagues and Board Members		
<b>Data Classification</b>	External use		
<b>Review Cycle</b>	24 months		
<b>Last Review</b>	Oct-24	Next Review	Oct-26
<b>Relevant Legislation</b>	Bribery Act 2010 Fraud Act 2006 Proceeds of Crime Act 2002 Companies Act 2006 (For Subsidiaries)		

	Public Contracts Regulations 2015 Regulatory Framework for RSH NHF Code of Governance Consumer Standards Economic Crime & Corporate Transparency Act 2024
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## 2. Document Version History

Version	Date	Author	Reviewer	Changes & Additions
V1.0	08/12/20	KFJ	Leadership Team	New policy based on Anti-Fraud and Corruption Policy
V1.1	06/12/22	EMu	Business Performance Team	Review of the policy
V1.2	14/10/24	KS	Risk & Audit Forum & Committee	Review and update of policy content to include anti-bribery and anti-money laundering and to align with the Economic Crime and Corporate Transparency Act 2023

## 3. Introduction

Thrive has in place principals and behaviours designed to maintaining our reputation as a professional landlord, underpinning a culture in which colleagues, customers, board members and stakeholders can challenge processes or behaviours that appear flawed or inappropriate others without fear of consequence.

## 4. Scope

This policy applies to Board and committee members, colleagues, contractors, sub-contractors, and any other person who is acting on behalf of Thrive or representing Thrive in any way. Thrive will seek to ensure that all these groups have a full understanding of their responsibilities and obligations.

## 5. Definitions.

Term	Description
Fraud:	The intentional distortion of financial statements or other records by persons internal or external to the organisation which is carried out to conceal the misappropriation of assets or otherwise for gain. Fraud is a deliberate act and is, therefore, always intentional and dishonest.
Anti-Fraud	Aims to establish an effective framework to prevent, detect and rectify incidents of fraud, whether that be from within or outside of Thrive
Corruption:	The offering, giving, soliciting or acceptance of an inducement or reward which may influence the actions of any person.
Anti-Corruption	Aims to establish a clear framework for identifying and preventing corruption ensuring all duties are conducted in a lawful and ethical manner. Aiming to enhance the awareness of corruption risks, the establishment of robust procedures to detect and prevent corruptive practices
Bribery	The act that involves the offer of promise, provision or acceptance of any financial or other benefit to persuade the recipient or another person to behave improperly in their duties, or as a reward for such behaviour

Anti-Bribery	Aims to establish a clear framework for identifying and preventing bribery ensuring all duties are conducted in a lawful and ethical manner. Aiming to enhance the awareness of bribery risks, the establishment of robust procedures to detect and prevent bribery practices
Money Laundering	The act of disguising the origins and ownership of property or funds obtained from criminal or terrorist activities
Anti-Money Laundering (AML)	Aims to guide preventative measures at Thrive to detect and prevent money laundering activities  Provide assurance that Thrive adheres to all relevant anti-money laundering laws and regulation

## 6. How Thrive sets out its expectations

Thrive will maintain a range of controls including our Professional Conduct & Probity Policy and Standing Orders to ensure that everyone involved with us is aware of what is acceptable, appropriate conduct and the processes to follow.

Thrive seeks to create a culture of honesty and integrity, in which fraud, dishonesty and corruption have no place. This culture is supported by the way in which Board members, colleagues and third parties working on or on behalf of Thrive conduct business, develop partnerships and challenge each other constructively.

Thrive colleagues and Board members are positively encouraged to raise any concerns they may have. Anyone raising concerns will be taken seriously and their identity kept confidential in line with our Whistleblowing Policy.

Customers, Board members and other service providers are positively encouraged to report concerns directly to an appropriate Thrive colleague or through the complaints process.

The Chief Executive and/or Executive Team will deal swiftly and firmly with anyone who defrauds Thrive Homes or is found to be corrupt. This may include contacting the Police, the HMRC or any other authority as appropriate. The Executive Team will ensure, that, Thrive colleagues are protected from malicious or unfounded allegations by maintaining and operating fair procedures. Thrive colleagues or Board members who deliberately make false accusations will be subject to Thrive Homes disciplinary processes.

## 7. Internal Financial Controls

Thrive has developed a risk & assurance framework, designed to ensure we meet all our regulatory and statutory requirements. This framework aims to provide the assurance Board requires.

The Executive Director Finance has a statutory responsibility to ensure the proper conduct of our financial affairs.

Thrive Homes maintains systems and procedures that incorporate effective internal controls and checks that feed through to the internal assurance arrangements.

Wherever possible, systems and procedures will include adequate separation of duties to ensure that the risk of error or impropriety is prevented.

Under Financial Regulations the Leadership Team must ensure that these controls are properly maintained and effective.

The existence, appropriateness and effectiveness of internal controls will be independently monitored by internal and external auditors who will report to the Risk and Audit Committee each year to enable Thrive Homes to comply with the Regulatory Standards.

Thrive colleagues and Board Members are responsible for highlighting any weaknesses in the framework of internal controls to ensure that these are addressed promptly. These concerns should

be raised with a head of service, business lead, supervisor or member of the Leadership team in the first instance.

## **8. Employment Controls**

As part of our pre-employment checks Thrive will maintain robust processes, ensuring anyone employed by Thrive has been subject to:

- Educational/employment referencing
- Education and professional membership check (as appropriate to the role)
- Right to Work in the UK, and
- An acceptable Disclosure & Barring Service check, before being confirmed in post (role specific)

Any professional membership that forms part of the colleague's contract of employment will be checked on an annual basis and the disclosure and barring check will be refreshed on a rolling three-year basis for roles in regular contact with customers in their homes or is key finance roles.

New colleagues will be asked to complete training on the Professional Conduct & Probity and Whistleblowing policies, as well as be given an overview of the Bribery Act 2010. This training also form part of Thrive's annual mandatory training. By completing this training Thrive seeks to reinforce the standards we have set and each individual's responsibility. This training can be refreshed at any time, but as a minimum, we will expect colleagues to refresh their knowledge annually.

As part of our Professional Conduct & Probity Policy colleagues and Board members will be asked, on an annual basis, to make a Declaration of Interest disclosure to ensure any relationships (family, friends & professional), housing matters or roles (paid & voluntary) held outside of Thrive don't conflict with the service we provide.

## **9. Customer Controls**

Thrive has policies and procedures in place to ensure only customers who meet our pre-tenancy conditions are offered a Thrive home, along with, ensuring that they can afford to meet the terms of the tenancy and pay their rent and service charges. This includes formal background, financial and identity checks as well as the person's right to reside in the UK.

Controls are also in place when processing Right to Buy (RTB) or Right to Acquire (RTA) requests. Thrive will ensure the customer is eligible under the rules of the scheme, check two forms of identification, and ask the customer to complete declarations relating to money laundering and bankruptcy.

When our contact centre is contacted by customers, we will confirm the identity of the individual before continuing the call. We will check at least 2 identifying factors including date of birth, telephone number, email address, monthly instalment, national insurance number; tenancy or payment reference.

The Home Plan and Tenancy visits also allow Thrive to ensure the home is being kept in good order and has not been sub-let or used to support criminal activity.

## **10. Procurement of goods and services**

Thrive has in place robust procurement processes, designed to ensure Thrive selects providers based on the evaluation of their product or service against a set of pre-set criteria. The following areas may form part of all suppliers qualifying criteria. Depending on the type and size of procurement, a proportionate level of detail will be requested through the tender process:

- Sustainability – pricing, workforce & environmental
- Customer Safety – Debarring Service checking procedures
- Contractor Responsibility – compliance with Thrive's standards

- Modern Slavery compliance
- Health, Safety and Wellbeing Policy & Procedures
- Quality Management System Procedures
- Equality & Diversity Policy & Procedures
- Environmental Policy & Procedures
- Conflict of Interest
- Data Protection Act
- Business Continuity Playbooks – disaster recovery procedures.

When submitting bids/completing a tender, companies must complete a non-collusive tendering certificate. Also, both the companies submitting, and the project group evaluating tender submissions complete a non-conflict of interest declaration. Any requests for changes that we receive from our suppliers (such as changes to bank details) are verified prior to being made.

All new suppliers will be expected to complete a suitability assessment, which captures auditable evidence of supplier compliance on the above.

## **11. Working to tackle Fraud, Bribery, Money Laundering and Corruption**

Thrive will work with other organisations to compare information to enable the detection of fraud, bribery, and corruption to take steps to end the fraud and to act against the perpetrator. This is particularly relevant in matters related to employment, procurement, and the allocation of property, with critical partners for example lenders, the Regulator for Social Housing and Local Authorities. Where possible, Thrive will work in collaboration to inform this work and to maintain appropriate levels of confidentiality.

### **11.1. Detecting and Investigating Fraud, Bribery and Corruption**

The Executive Team is responsible for ensuring any allegation of fraud, corruption or bribery received is dealt with through clearly defined procedures, including:

- Ensuring that all allegations are responded to within two working days
- Ensuring that all evidence is recorded
- Ensuring the security and confidentiality of all evidence collected
- Implementing disciplinary procedures where appropriate.

In investigating allegations, the Chief Executive may appoint an appropriate Executive Director and/or internal auditor or other technical experts to lead and investigate the allegation to determine the extent of actual/potential losses or liability.

Financial irregularities will be reported to the Executive Director Finance who will undertake the investigation. Other irregularities will be raised with the appropriate Director or the Chief Executive. If the concern relates to the CE, this should be raised with the Chair of the Board.

The officer leading the investigation will ensure that appropriate employment advice is obtained to ensure that it is possible to take disciplinary action where the outcome of the investigation confirms improper behaviour.

The officer leading the investigation will advise the Chief Executive when external disclosure is required, to insurers, the Regulator or the matter could be referred to the Police.

Where financial impropriety is discovered, the presumption is that the Police will be called in, this will not prohibit action under disciplinary procedures.

The Chief Executive will brief the Board Chair and Chair of Risk and Audit Committee. Thrive colleagues and Board members will not speak to the press or make any public statement about suspected fraud, bribery or corruption activity without the express authority of the Chief Executive.

### **11.2. Fraud, Bribery, Corruption and AML Principles**

### 11.2.1. Zero Tolerance

We will adopt a zero-tolerance approach towards any form of fraud, bribery, corruption, and money-laundering, it is unacceptable to.

- Give, promise to give, or offer a payment or a favour, with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- Give, promise to give, or offer a payment or a favour to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- Accept a payment or a favour from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them;
- Retaliate against or threaten a person who has refused to commit a bribery offence, or who has raised concerns under this Policy; and/or
- Engage in activity in breach of this Policy, examples of fraud can be,
  - False representation
  - Failing to Disclose
  - Abuse of Position

### 11.2.2. Accountability

All individuals associated with Thrive are accountable for upholding and promoting integrity. We require that everyone acts honestly and with integrity at all times and safeguards Thrive's resources and reputation.

### 11.2.3. Collaboration and Transparency

Thrive is committed to working in tandem with regulatory and law enforcement agencies as well as supervisory authorities (e.g. HMRC) and strives for operational transparency and adherence to best practices.

### 11.2.4. Protection

We offer protection to those who raise concerns in good faith, ensuring they are free from retaliation. Please refer to the organisation's Whistleblowing Policy for further information

### 11.2.5. Vigilance and Reporting

Thrive commits to continuous monitoring and mandatory reporting of any suspicious financial activities, in line with legal requirements and internal guidelines.

### 11.2.6. Education and Awareness

Ongoing training and awareness initiatives are key to ensuring all Board and Committee Members, colleagues and relevant stakeholders thoroughly understand Fraud, Bribery, Corruption and AML Regulations and the associated risks

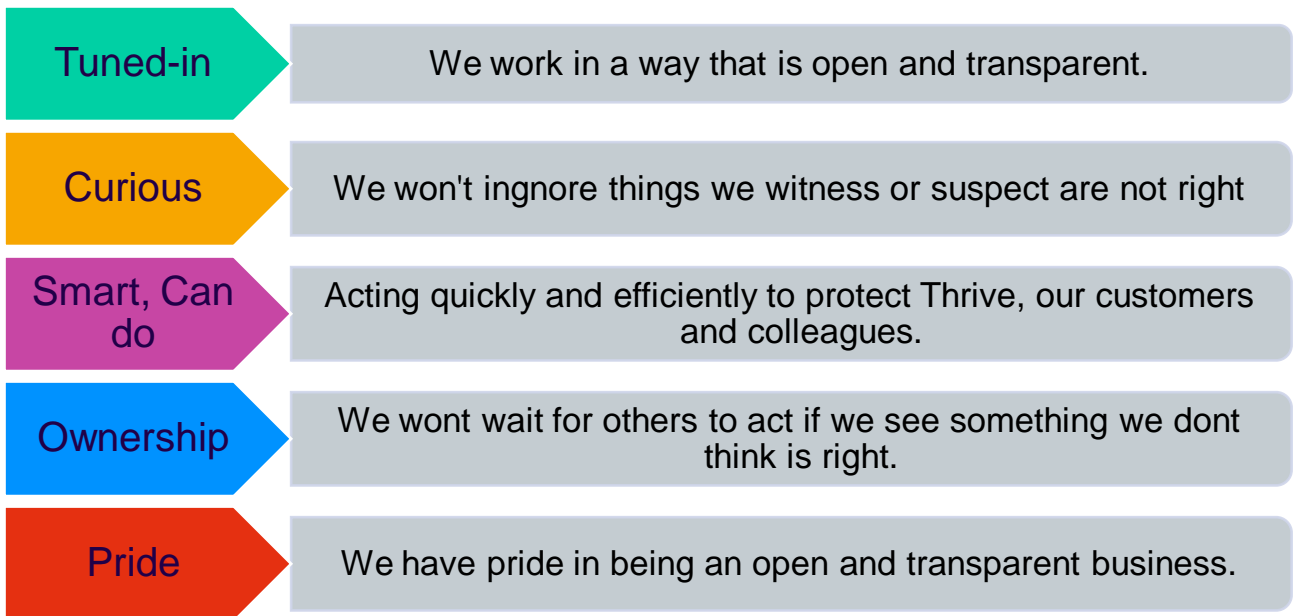
## 12. Regulatory Compliance

Under the Economic Crime and Corporate Transparency Act 2024, Companies House hold greater powers to query information and request supporting evidence these include;

- Stronger checks on company names
- New rules for registered office addresses
- A requirement for all companies to supply a registered email address;
- A requirement for all companies to confirm they're forming the company for a lawful purpose when they incorporate, and to confirm its intended future activities will be lawful on their confirmation statement
- The ability to annotate the register when information appears confusing or misleading; taking steps to clean up the register, using data matching to identify and remove inaccurate information; sharing data with other Government departments and law enforcement agencies

Thrive must ensure that we hold assessable relevant information and registers to supply Companies House if a request for supporting evidence is submitted.

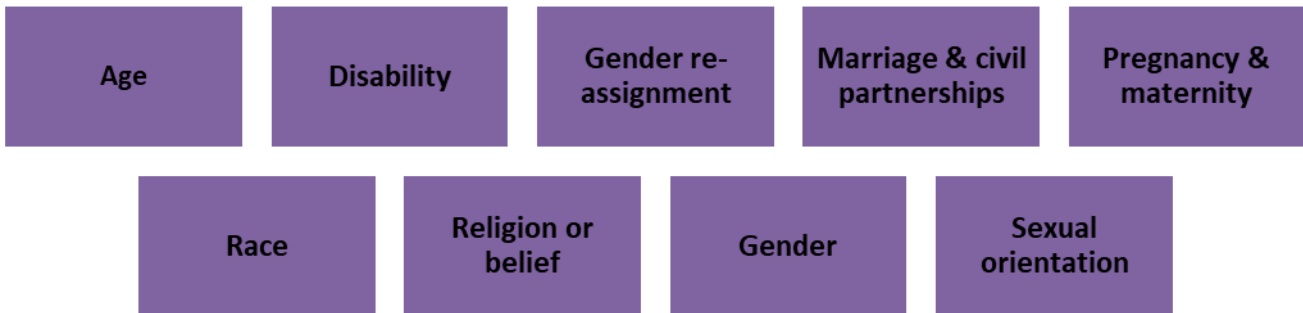




Customers and colleagues are entitled to hold us accountable if we behave in a manner that isn't in keeping with the statements above. To be clear that doesn't mean we can always deliver exactly what is being sought. but it does mean we demonstrate empathy and provide clarity.

### 13. Treating Everyone with Respect

This policy has been impact assessed in line with Thrive Homes' obligation to comply with the Equality Act (2010). We aim to design inclusive services, policies and behave in a way that does not discriminate on the grounds of:



While we are not required by law, we seek to ensure we do not discriminate on any basis that is rooted in prejudice, for example we are not influenced by:



Every effort will be made to ensure that decisions made reflect this commitment.

### 14. Other Related Policies and Guidance

This policy links to other policies Thrive has in place, including but not limited to:

This policy links to other policies Thrive has in place, including but not limited to:

- Risk Management & Assurance Framework
- Professional Conduct & Probity Policy

- Treasury Management Policy
- Whistleblowing Policy
- Recruitment and Onboarding Policy
- Mandatory Training courses
- Empty Homes and Letting Policy
- Procurement and Contract Management Policy
- Living Will

As a business we try hard to keep all these related policies aligned with each other. Anyone spotting inconsistency or contradictory statements, is asked to contact the Author and make concerns known. Supporting us to keep information clear and consistent will always be welcomed.

## **15. Policy Approval**

As this policy is a core component of how Thrive manages its business the document will be evaluated by the Risk & Audit Forum, Business Resilience Working Group and Risk & Audit Committee part of any review.

## **16. Support and Further Guidance**

This policy has been drafted with input from colleagues across Thrive. Any concerns on how to interpret or follow its requirements, can be raised with members of the Governance, Finance or Procurement Teams.

Colleagues, Board Members and third parties have a responsibility to work in a way that's consistent with the expectations set out in the policy and its implied intent. Should anyone witness or become aware activities that undermine or conflict with the intention this policy please alert a member of the Finance or Governance Team, or any member of the leadership team as soon as possible.