Tenancy Fraud Policy

This policy sets out Bromford Flagship LiveWest's approach to tenancy fraud, in support of delivering safe, fair and responsive services to our customers. It is underpinned by legal duties, regulatory expectations, and a commitment to fairness, accountability, and transparency.

Department	Risk	
Policy owner	Group Insurance and Financial Crime Manager	
Approved date	**September 2026**	
Date for review	**September 2029**	
Approving body	Audit and Risk Committee	
Associated legislation/regulation	Bribery Act 2010 Crime and Policing Act 2026 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	Housing Act 2004 Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 Prevention of Social Housing Fraud Act 2013 Proceeds of Crime Act 2002 Public Interest Disclosure Act 1998
Legal advice from	None	
Equality impact assessment date	August 2026	
Version number	**1.0**	
Publication status	Internal and External	

Approval

This policy was approved by Audit and Risk Committee and is applicable to:

- Bromford Flagship Ltd
- Bromford Housing Association Ltd (operating as Bromford)
- Bromford Home Ownership Ltd (operating as Bromford)
- Merlin Housing Society Ltd (operating as Bromford)
- Flagship Housing Limited (operating as Flagship)
- LiveWest Homes Ltd (operating as LiveWest)

Any references to Bromford Flagship LiveWest should be interpreted as equally applicable to all the above.

Purpose/principles

The Group is committed to preventing, detecting, and addressing tenancy fraud and fostering a culture of honesty, integrity, and transparency. We take a zero-tolerance approach to tenancy fraud. We are committed to ensuring that our homes are occupied by those entitled to live in them and will take appropriate action where tenancy fraud is identified. These principles are applied consistently and without exception across all areas of our business.

Scope

This policy applies to all confirmed or suspected instances of tenancy fraud affecting the Group. This includes fraud committed by current customers, former customers, applicants for housing, occupiers, leaseholders, members of the public, colleagues, contractors, and any individuals or organisations with whom we maintain a business relationship. It also applies to associated persons acting for, or on behalf of, the Group where their actions may facilitate, enable or involve tenancy fraud.

Roles/responsibilities

Board has overall responsibility for this policy.

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

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

Risk and Disclosure Committee (RDC) and Risk and Regulation Group (RRG) are responsible for the following:

- Reviewing periodic reports, financial crime related management information, and monitoring progress as submitted by the Group Insurance and Financial Crime Manager.

The Group Insurance and Financial Crime Manager is responsible for:

- Overall responsibility for the coordination and execution of all anti-financial crime activities across the Group.
- Developing tenancy fraud crime training and awareness for delivery across the Group.

- Leading the delivery and communication of tenancy fraud prevention, detection, deterrence, and investigation initiatives, in alignment with the financial crime framework.
- Providing regular management information relating to tenancy fraud.

All colleagues are responsible for the following:

- Act in accordance with the principles outlined in this policy.
- Demonstrate the Group 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 the Group resources, including the handling of funds and interactions with contractors, suppliers, and customers.

Policy content

What is tenancy fraud

Tenancy fraud occurs when an applicant or customer deliberately provides false information or withholds relevant details to obtain or retain a social housing tenancy to which they are not entitled. It also includes the misuse of a property in breach of tenancy conditions. Common types of tenancy fraud include:

- Subletting fraud – where a customer rents out all or part of their home without permission.
- Non-occupation fraud – where a customer does not live in the property as their principal home.
- False application fraud – where false information is provided during the housing application process.
- Succession fraud – where someone falsely claims the right to succeed a tenancy after the original customer has died.
- Right to Buy fraud – where false information is used to purchase a property.
- Key selling – where a tenant is paid to hand over their keys to someone else.
- Abandonment – where a customer leaves the property without formally ending the tenancy, often while continuing to claim housing-related benefits or allowing others to occupy the home unlawfully.
- Mutual exchange - providing false or misleading information during a housing mutual exchange to gain approval, secure a property, or conceal circumstances that would affect eligibility.

Policy commitment

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

- Safeguarding colleagues, customers, third parties, assets, and resources from misuse or misappropriation.

- Promoting a culture of honesty, integrity, and accountability across all levels of the Group.
- Ensuring compliance with legal, regulatory, and contractual obligations, including reporting requirements to the Regulator of Social Housing (RSH).
- Supporting a consistent and initiative-taking approach to tenancy fraud prevention, deterrence detection, investigation, and seeking redress.

Prevention and detection of tenancy fraud

The Group is committed to preventing, detecting, and responding to tenancy fraud through a range of proportionate and risk-based controls. These include:

- Identity and eligibility verification at application stage
- Pre-tenancy checks
- Data matching and analytics
- Tenancy audits
- Occupancy inspections
- Colleague training
- The investigation of allegations received from colleagues, customers, and third parties.

The Group will work with partner agencies where appropriate to identify and address suspected tenancy fraud, protecting our homes and ensuring these are allocated to those with a genuine housing need.

Colleagues reporting concerns about tenancy fraud

Any concerns relating to tenancy fraud can be reported as follows:

- Report tenancy fraud
- fraud@bromford-flagship.co.uk
- Whiss - Digital Whistleblowing Service

External reporting of tenancy fraud

Where a third party, stakeholder, customer, or member of the public wishes to report actual or suspected tenancy fraud, concerns can be raised through the following reporting channels:

- fraud@bromford-flagship.co.uk
- Bromford tenancy fraud
- Flagship tenancy fraud
- LiveWest tenancy fraud

Sanctions and legal action

The Group has a zero-tolerance of tenancy fraud. Where fraud is identified, we will take decisive action to recover properties that are being illegally occupied, assigned, sublet, or obtained fraudulently, ensuring that these homes can be returned to those in genuine housing need.

The Group will pursue all appropriate remedies, including possession proceedings, civil recovery of financial losses and unlawful gains, tenancy enforcement action, and referrals for criminal investigation where offences are suspected. All enforcement and recovery action will be supported by a clear evidential basis and undertaken in a fair, consistent and proportionate manner, in accordance with relevant legislation and our policy framework.

In addition, we may share information with relevant authorities and partner organisations in accordance with legal and data protection requirements.

EIA statement

An Equality Impact Assessment was undertaken for this policy in August 2026 and no impact was identified, or changes required.

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.

Training statement

This policy will be trained out to relevant colleagues by eLearning on a two-year cyclical basis.

Measuring effectiveness

The effectiveness of this policy will be measured through audits, regular reporting to RRG, RDC and ARC and the submission of the Annual Fraud Return and regulatory return.

Review period

This policy will be reviewed every three years by the Group Insurance and Financial Crime Manager or sooner in response to significant regulatory or organisational changes. The Audit and Risk Committee approve it.

Supporting documents

- 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
1.0	New Group policy replacing legacy policies	Risk and Disclosure Committee	September 2026