

For Decision/Approval

Agenda Item: 10.2.4
Meeting Date: 29/10/25

To: The Management Committee

From: The Director

Subject: Review of Prevention of Fraud and Anti-Bribery Policy

1. Introduction and Purpose

- 1.1 As per the Policy Review Timetable for 2025/26, the above Plan is now due for review.
- 1.2 The review of the Policy did not result in extensive changes but due to the important nature of the Policy is being presented for Committee approval.

2. Review of Prevention of Fraud and Anti-Bribery Policy

- 2.1 As part of the review I considered the policies of a number of other RSLs. Some were very similar in nature and others more or less covered the matters that currently exist in our Policy.
- 2.2 In general we have updated or logo and any references to Co-operative have been changed to Association. The only material change to the policy is as follows:
 - Section 5: Fraud Definitions and Examples – a new sub-section 5.5 Cyber Fraud has been added. This is to reflect that cyber security is one of the biggest risks facing businesses today. It covers the types of cyber fraud and the preventative measures we have in place.

3. Risk

- 3.1 We have considered the risks relating to fraud and bribery and have identified the key risks under the following risk categories and the measures we have taken to mitigate such risks.

Risk Category	Mitigating Measure
Governance: Inadequate controls and measures in places;	A comprehensive Prevention of Fraud and Anti-bribery Policy in place;

<p>Staff unclear as to who to report concerns of fraud or bribery to;</p> <p>Staff and Committee unclear as to how to deal with reports of fraud, bribery;</p> <p>Fail to notify SHR of any incidents of fraud or bribery</p>	<p>Fraud Response Plan in place;</p> <p>Policy and Whistleblowing Policy accessible to Committee and Staff;</p> <p>Notifiable Events Section in Policy;</p>
<p>Legal and Regulatory:</p> <ul style="list-style-type: none"> As above 	As above
<p>Reputation:</p> <ul style="list-style-type: none"> Loss of confidence of tenants, stakeholders and Regulators 	<p>As above, whilst recognising that no absolute guarantees that measures in place will prevent incidents of fraud, corruption or bribery.</p> <p>Ensure effective communication with tenants, stakeholders and Regulators</p>

4. Delivery of our Strategic Objectives

Area	Related Strategic Objective(s)
Review of Prevention of Fraud and Anti-bribery Policy	7) Achieve the highest standards in all that we do

5. Application of our Core Values

Area	Related Core Value(s)
Review of Prevention of Fraud and Anti-bribery Policy	<ul style="list-style-type: none"> Accountable and Compliant Efficient and Responsible Excellent and Committed

6. Compliance and Assurance

- 6.1 By having a Prevention of Fraud and Anti-bribery Policy in place which is periodically reviewed ensures we are compliant with Regulatory Requirements as follows:

Compliance Source	Details
The Standards of Governance and Financial Management for RSLs	Standard 1 - The governing body leads and directs the RSL to achieve

good outcomes for its tenants and other service users.

Guidance 1.3 - The governing body ensures the RSL complies with its constitution and its legal obligations. Its constitution adheres to these Standards and the constitutional requirements set out below.

Standard 2 - The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these priorities.

Guidance 2.5 - The RSL is open, co-operative, and engages effectively with all its regulators and funders, notifying them of anything that may affect its ability to fulfil its obligations. It informs the Scottish Housing Regulator about any significant events such as a major issue, event or change as set out and required in the notifiable events guidance.

Standard 4 - The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose.

Guidance 4.4 - The governing body identifies risks that might prevent it from achieving the RSL's purpose and has effective strategies and systems for risk management and mitigation, internal control and audit.

Standard 5 - The RSL conducts its affairs with honesty and integrity.

Guidance 5.1 - The RSL conducts its affairs with honesty and integrity and, through the actions of the governing body and staff, upholds

	<p>the good reputation of the RSL and the sector.</p> <p>Guidance 5.2 - The RSL upholds and promotes the standards of behaviour and conduct it expects of governing body members and staff through an appropriate code of conduct. It manages governing body members' performance, ensures compliance and has a robust system to deal with any breach of the code.</p> <p>Guidance 5.4 - Governing body members and staff declare and manage openly and appropriately any conflicts of interest and ensure they do not benefit improperly from their position.</p> <p>Guidance 5.6 - There are clear procedures for employees and governing body members to raise concerns or whistleblow if they believe there has been fraud, corruption or other wrongdoing within the RSL.</p>
SHR Statutory Guidance on Notifiable Events	Statutory Guidance

6.2 Evidence Bank

Evidence	Assurance Exercise Location
<ul style="list-style-type: none"> Cover Report Revised Prevention of Fraud and Anti-bribery Policy 	Regulatory Standard 1 – Guidance 1.3; Regulatory Standard 2 – Guidance 2.5; Regulatory Standard 4 – Guidance 4.4; Regulatory Standard 5 – Guidance 5.1, 5.2, 5.4 and 5.6

6.2.1 Committee is reminded that our Assurance Exercises are available in the Committee Log-in Area of our website, which Committee can access at any time.

7. Summary

- 7.1 The Prevention of Fraud and Anti-bribery Policy is now due for review as per the Annual Policy Review Timetable 2025/26.
- 7.2 The review did not result in extensive changes but there is one material change as covered in Section 2 of this report.
- 7.3 The associated risks are considered at Section 3.
- 7.4 Section 4 shows how having a Prevention of Fraud and Anti-bribery Policy and reviewing it, contributes to the delivery of our strategic objectives.
- 7.5 Section 5 shows how having a Prevention of Fraud and Anti-bribery Policy and reviewing it, contributes to the application of our core values.
- 7.6 Section 6 shows how we are compliant with regulatory requirements.
- 7.7 Committee is asked to consider this report and the one material revision to the Prevention of Fraud and Anti-bribery Policy, and approve the revised Policy.