

Prevention of Fraud and Anti-bribery Policy

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1. Introduction

1.1 Rosehill Housing Co-operative Limited (Rosehill) recognises the importance of protecting the organisation including its operations, its employees, suppliers, and its assets, tenants and residents against financial risks, operational breaches, and unethical activities.

1.2 Losses due to fraud, theft or corrupt practices could have a direct effect on the level and quality of service provision. Rosehill plays an important role in the local area and any instances of fraud or corruption could be damaging for its reputation. It is wrong to assume therefore that actual financial losses are the only negative outcome of frauds. The full cost is usually much greater than the amount stolen, as the costs associated with correction may be material. Staff morale and the level of confidence of tenants, owners, partners, suppliers, our lenders, and The Scottish Housing Regulator may decline as a result of fraud.

1.3 Rosehill has a responsibility to its tenants, owners, staff, partners, suppliers, and other stakeholders in general to take all reasonable steps to prevent the occurrence of fraud. This policy sets out in more detail procedures for:

- fraud prevention and detection
- the investigating and reporting of fraud
- recording of fraud
- responsibilities

1.4 Information is also provided on risk management, internal controls, management checks, staff training and the Bribery Act 2010.

1.5 This policy applies to all employees and to temporary workers, consultants, contractors, agents, and subsidiaries acting on Rosehill's behalf. Breaches of this policy are likely to constitute a serious disciplinary, contractual and or criminal action for the individual(s) concerned.

2. Legal and Regulatory Requirements

2.1 The following legislation is relevant to this Policy:

2.2 Bribery Act 2010

2.2.1 The Bribery Act 2010 codifies the law relating to bribery and corruption.

2.2.2 Corruption is the misuse of office or power for private gain. Bribery is a form of corruption and means that it falls within the scope of this policy.

2.2.3 Under the Bribery Act 2010 it is illegal to:

- Offer, promise to give or to pay a bribe
- Request, agree to receive or accept a bribe
- Bribe a foreign public official
- Fail to have adequate procedures in place to prevent bribery

2.2.4 The Bribery Act is one of the widest-ranging pieces of legislation in the field. It covers: bribery which occurs in the UK or abroad; any corrupt act by a UK business (or by a foreign country carrying on any part of its business here) whatever it occurs. A corrupt act committed abroad may well result in a prosecution in the UK. Nor does it matter whether the act is done directly or indirectly.

2.2.5 If Rosehill or anybody acting on Rosehill's behalf is found guilty of bribery (or even of failing to have adequate procedures in place to prevent bribery) they will be subject to large fines (£5,000 to unlimited). Any person guilty of bribery will be subject to fines and/or imprisonment (up to ten years).

2.2.6 Reference to the Bribery Act shall be contained in all relevant policies and contracts with suppliers.

2.3 In Scotland, criminal fraud is mainly dealt with under common law and a number of statutory offences.

2.4 Regulatory Requirements

2.4.1 The Regulatory Standards of Governance and Financial Management requires that the RSL conducts its affairs with honesty and integrity. (Standard 5) The related guidance GS5.1, GS5.2, GS5.4 and GS5.6 further state:

- The RSL conducts its affairs with honesty and integrity and, through the actions of the governing body and staff, upholds the good reputation of the RSL and the sector.
- 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.
- 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.
- There are clear procedures for employees and governing body members to raise concerns or whistle blow if they believe there has

been fraud, corruption or other wrongdoing within the RSL.

2.3.2 Having a clear and comprehensive Policy governing our requirements to prevent fraud and corruption and comply with the Bribery Act 2010 is an essential part of ensuring our compliance with legislative and regulatory requirements.

3. Associated Policies and Documents

3.1 The following are relevant to this Policy:

- Codes of Conduct (staff and committee)
- Financial Regulations
- Whistleblowing Policy
- Entitlements, Payments, and Benefits Policy
- Gifts and Hospitality Policy
- Committee and Staff Expenses Policy
- Scheme of Delegated Authority
- Notifiable Events – SHR Statutory Guidance

4. Our Values

4.1 The delivery of our Vision and Strategic Objectives is underpinned by our Core Values:

We will

- Invest and Support

We will be

- Engaged and Responsive
- Accountable and Compliant
- Fair and Approachable
- Efficient and Responsible
- Excellent and Committed

4.2 The existence and implementation of this Policy is a good example of our Values in practice with particular reference to being accountable and compliant.

5. Fraud Definition and Examples

5.1 Fraud can be defined as any act actual or alleged wilful dishonesty to gain individual or collective advantage. It is taken to include theft, deception, bribery, forgery, extortion, corruption, conspiracy,

embezzlement, misappropriation, concealment of material facts and collusion. For practical purposes, fraud may be defined as the use of deception with the intention of obtaining advantage, avoiding an obligation or causing loss to another party.

5.2 Staff should be aware that gifts, including hospitality, offered by contractors, suppliers and service providers may place an employee in a vulnerable position. Even when offered and accepted in innocence, such gifts may be misconstrued by others. The offer, acceptance or refusal of gifts and hospitality should be in accordance with the following Policies:

- Entitlements, Payments, and Benefits Policy
- Gifts and Hospitality Policy

5.3 Some examples of fraud that may be perpetrated against Rosehill are:

- Theft of cash or other assets;
- False accounting and /or making fraudulent statements with a view to personal gain or gain for another;
- Bribery and corruption – offering, giving, soliciting or accepting an inducement or reward that may influence the actions taken by Rosehill’s staff, for example in the procurement of goods or services;
- Claims for payment of works of maintenance that haven’t been completed / don’t exist / exaggerated / excessive;
- Claims for payment of supplies that have not been provided;
- Falsification of expenses and invoices;
- Falsification of attendance and absence records;
- Knowingly providing false information on job applications and requests for funding;
- Alteration or falsification of records (computerised or manual);
- Failure to account for monies collected;
- Tenancy Fraud-including false applications and illegal sub-letting;
- Acceptance of bribes for access to housing;
- Payroll fraud;
- Property sales fraud including incorrect valuations/application of discount;
- Development fraud-may include inflating land prices;
- Benefit fraud;
- Procurement fraud;
- Bank mandate fraud;
- Online fraud.

5.4 The above list is not exhaustive.

6. Fraud Prevention

- 6.1 Rosehill has established a system of internal controls, policies, and procedures, in an effort to deter, prevent and detect fraud and corruption.
- 6.2 All new employees (including temporary and contract) are asked to provide details of any current unspent criminal offences (in terms of the Rehabilitation of Offenders Act 1974) Rosehill will verify details provided in the application form including references and educational checks. All staff must demonstrate their eligibility to work in the UK.
- 6.3 All suppliers and contractors must be in good standing and subject to screening by Rosehill in accordance with its Procurement policy.
- 6.4 All contractual agreements with Rosehill will contain the provision prohibiting fraudulent or corruptive acts and will include information about reporting fraud and corruption.
- 6.5 All staff will receive fraud, corruption, and bribery awareness training typically on a 2 yearly cycle. This Policy will be covered with all new staff as part of the induction process.
- 6.6 An anti-fraud and anti-bribery culture shall be nurtured throughout Rosehill.

7. Fraud Detection

- 7.1 The primary responsibility for detecting fraud and bribery lies with the Management Committee and the Management Team through the implementation, documentation, and operation of effective systems of internal control. However, all staff have a responsibility to be aware of the potential for fraud and bribery and take the necessary steps to minimise the risk to Rosehill. The Management Team should ensure staff in their areas of operation are familiar with the common types of fraud and bribery.
- 7.2 Rosehill is not advocating the creation of an overtly suspicious environment but expects staff to be alert to the potential for fraud and bribery in areas where they operate.
- 7.3 Rosehill's internal auditors, through their evaluation of the control framework, also have a role to play in preventing and detecting fraud and bribery; however this is not the main remit of internal audit.

8. Fraud Investigation and Reporting

- 8.1 Staff will often be the first to notice the potential for, or actual, fraud or acts of bribery. Staff suspicious of fraud or acts of bribery should report their concerns to their Line Manager or the Director. This requirement to alert is not confined to suspicions about other members of staff, but includes any misgivings staff may have about contractors, suppliers etc. If for any reason it is felt reporting in this manner is inappropriate staff may report confidentially to the Chair of the Management Committee **or** contact our internal or external auditors directly. The contact details for the auditors are attached at Appendix 1.
- 8.2 Where it appears that the fraud or act of bribery may have involved the Director, the Chairperson should be notified immediately, who shall then contact both the internal and external auditors who will guide them accordingly.
- 8.3 Staff should not be dissuaded from reporting actual or suspected fraud or acts of bribery as all cases will be treated in the strictest confidence. Rosehill is fully committed to supporting and protecting staff that raise legitimate concerns where possible. However, Rosehill cannot guarantee anonymity and may have to provide, for example, witness statements to assist with the investigation.
- 8.4 Provided the allegations have been made lawfully, without malice and in the public interest, the employment position of the person will not be disadvantaged for reasons of making this allegation. Rosehill's Whistleblowing Policy contains further information on this.
- 8.5 Any action to prevent the reporting or any attempts at intimidation will be treated seriously and Rosehill will immediately report such action to the police.
- 8.6 Fraudulent or corrupt activity by a staff member is regarded as a breach of contract and where there are grounds for suspicion then suspension, pending the outcome of enquiries, is likely. Where there are grounds to suspect that criminal fraud has occurred Rosehill's policy in all such cases is to immediately advise the Police. The Police and Procurator Fiscal will be solely responsible for deciding whether a criminal investigation is required. In all cases Rosehill will co-operate fully with the Police and pursue prosecutions where possible.
- 8.7 Rosehill may start its own investigation while any Police investigation is ongoing. Rosehill will follow its own disciplinary procedure if required.

- 8.8 Where dishonesty is detected then disciplinary procedures will be instigated and this may lead to dismissal of the individual concerned. Rosehill's auditors or any other appointed independent investigator will be called in to carry out a fuller investigation and to provide independence in the investigation. In all cases Rosehill will co-operate fully with those carrying out the investigation.
- 8.9 Line managers should note that suspects have certain rights under the law and no action (such as interviewing staff) should be taken without prior legal or EVH consultation. Failure to follow established procedures in relation to investigating fraud or corruption and interviewing the staff involved can invalidate disciplinary action and compromise the success of any future investigation and/or prosecution.
- 8.10 Where the suspected fraud or corruption involves unknown parties and estimated to be under £500 in value, Rosehill will only report the matter to the Police if it is deemed appropriate to do so by the Director.
- 8.11 Rosehill will require that any staff member who is convicted of a fraudulent act whilst employed by Rosehill is required to inform the Director. Rosehill will take a view on whether or not the offence committed will result in the staff member being able to continue in their current post. As part of this Rosehill will carry out a risk assessment of the position. Where appropriate, advice will be sought from EVH and/or our employment solicitor before a decision is made.
- 8.12 The Management Committee must reflect on the nature of the fraud and raise a Notifiable Event with the SHR as appropriate.
- 8.13 A fraud response plan is attached at Appendix 2.

9. Fraud Register

- 9.1 All frauds, suspected or actual, will be recorded in the Fraud Register, held by the Director. This will be reviewed annually by the Management Committee.
- 9.2 The Director will have the responsibility of maintaining this register which will show the following information:
- Scope and circumstances arising; summary of what happened
 - Action taken by Rosehill and Police
 - Outcome
 - Any control action required as a result of the fraud
 - Estimate of Loss / Potential Loss
 - Extent of / potential for recovery of loss

- Date reported to the Scottish Housing Regulator (all suspected or actual fraudulent activity is to be reported)

9.3 Should any loss through fraud be sustained by Rosehill, the Management Committee shall take all reasonable steps to recoup the loss if the loss is of a material amount. The loss may be recouped from the perpetrator of the fraud or through an insurance fidelity guarantee claim.

9.4 An extract of the Fraud Register is attached at Appendix 3.

10. Responsibilities

10.1 Management Committee

10.1.1 The Management Committee is responsible for establishing an adequate system of internal control and for ensuring that these are regularly reviewed for effectiveness and compliance.

10.1.2 It is acknowledged that there can never be any 'absolute' guarantees that internal checks and systems and procedures established will always prevent fraud, corruption, bribery or malpractice occurring.

10.1.3 Under the terms of the Committee Code of Conduct, all Committee Members are required to:

- Report any concerns or suspicions about possible fraud, corruption or other wrongdoing to the appropriate senior person within the organisation in accordance with our whistleblowing policy.
- comply with our policies and procedures regarding the use of our funds and resources and will not misuse, contribute to or condone the misuse of these resources.

10.1.4 The Committee Code of Conduct also clearly states that "We forbid all forms of bribery, meaning a financial or other advantage or inducement intended to persuade someone to perform improperly any function or activity." Committee must:

- neither accept from nor give bribes or any other inducement to anyone.
- comply with our policy on bribery, Prevention of Fraud and Anti-bribery Policy.
- report any instances of suspected bribery or corruption within the organisation or any of its business partners.

10.1.5 The Management Committee will consider Internal Audit reports and recommendations and decide what recommendations it will accept.

10.1.6 The Management Team will be responsible for implementing the recommendations.

10.1.7 The external auditors Management Letter will also be considered by the Management Committee who will reply to any points raised.

10.1.8 The Committee will also review the Fraud Register on an annual basis.

10.2 Management Team

10.2.1 The Management Team has a responsibility for preventing fraud through:

- identification of risks to which systems and procedures are exposed
- developing and maintaining effective internal controls to prevent fraud
- establishing an environment that promotes compliance with internal controls
- promoting fraud, corruption and bribery awareness amongst staff
- fostering an 'anti- fraud' culture
- ensuring that if a fraud or attempted fraud (including acts of bribery) occurs a vigorous and prompt investigation takes place without regard to position held or length of service
- take appropriate disciplinary and legal action in all cases where justified
- reviewing systems and procedures to prevent similar frauds arising

11. Internal Controls

11.1 Internal controls are the key element in preventing fraud. They should be documented, communicated to all staff and the importance of compliance regularly reminded to staff. It is the responsibility of each line manager to ensure controls within their areas of responsibility have been documented and communicated and operate effectively.

11.2 Managers should assess the types of risk involved in the operations for which they are responsible; to review and test the control systems for which they are responsible regularly; to ensure that controls are being complied with; and to satisfy themselves that their systems

continue to operate effectively.

- 11.3 Management should periodically monitor compliance with controls and may also ask the Internal Auditors to test compliance. It should be emphasised that the main remit of internal audit is to evaluate the effectiveness of the overall framework of internal control, with management being responsible for ensuring implementation and monitoring of the framework.
- 11.4 Common excuses for non-compliance with controls are that they are no longer applicable, insufficient time is available or they are not appropriate. It is important that such comments are reported to line managers so that the need for the controls can be re-evaluated and amended as appropriate.

12. Management Checks

- 12.1 The prevention and detection of fraud and impropriety is only possible where strong internal controls are present and constantly applied. Routine checks and monitoring by management to ensure that procedures are being followed are therefore essential. There are two benefits from implementing a culture of strong management controls:
- a deterrent effect when it is known that Management is actively involved in ensuring that procedures are followed, and
 - the results of the checks will allow Management to identify any operational areas where controls are not being uniformly applied and investigate whether systems have been exploited and need to be reviewed.

13. Corporate Governance

- 13.1 The Scottish Housing Regulator monitors Rosehill's adherence to corporate governance requirements through their publication of the annual Regulation Plans and more so, desk top reviews of various statutory returns.
- 13.2 Development of best practice and recommendations arising from the publication of other inspection reports and Governance Matters publications, will continue to be important in the development of an environment in which awareness of responsibility for fraud prevention and detection can flourish.

14. Staff Training

- 14.1 Staff often provide the best protection against fraud and corruption. It is important therefore, that the policy on fraud prevention and investigation is fully communicated to all staff. The lack of clear guidance and ignorance of procedures will often be the first excuse used by offenders.
- 14.2 The recruitment of suitable staff is the first defence in preventing fraud. Best practice recruitment policies such as detailed application forms including a statement on relevant unspent convictions, written and verbal communication with referees and past employers and educational and professional qualifications will be strictly adhered to.
- 14.3 Staff awareness of policy and procedures is fundamental to the effective operation of systems. Best practice includes:
- instruction and discussion on control and probity issues as part of staff induction;
 - formal staff training on operational procedures;
 - desktop instructions for specific tasks;
 - publication of the policy on fraud, corruption, and anti-bribery; and
 - regular staff notices regarding changes to control systems, policies, and procedures.

15. Risk Management

- 15.1 In all key areas of our business we need to consider any risks which may arise. To this end we have in place a robust Risk Management Policy and from this flows our Risk Register. We have identified our strategic risks which are regularly monitored by our Management Team and Audit Sub-Committee.
- 15.2 Strong and effective Governance is fundamental to Rosehill's success as a business and to upholding its reputation and as part of this Rosehill must be accountable and compliant. To this end Rosehill must have a clear and comprehensive Policy for the prevention of fraud and to comply with the Bribery Act 2010. This will assist with the mitigation of risks relating to breaching legal requirements, loss of confidence by our tenants, other service users and stakeholders, reputational damage, and Regulatory intervention.
- 15.3 While the Management Team is responsible for assessing and controlling the level of risk within their areas of authority, it is the responsibility of all staff to be aware of fraud, corruption and bribery and take the necessary steps to minimise the risk to Rosehill.

15.4 Managing the risk of fraud is the same in principle as managing any other business risk. It is best approached systematically both at corporate and operational level. Managers should identify risk areas, assess the scale of risk, allocate responsibility for managing specific risks and implement and test controls to minimise the risks.

15.5 The Management Team also has a responsibility to familiarise themselves with common fraud techniques in areas for which they have control. This should include being alert to signs which indicate that fraud is taking place.

16. Data Protection

16.1 On the 25th May 2018 the legislation governing data protection changed with the introduction of the General Data Protection Regulation (GDPR). Following the UK's exit from the EU, and the end of the transition period which followed, the GDPR formed part of the retained EU law and became the UK GDPR which together with the Data Protection Act 2018 constitute the UK's data protection legislation.

17. Review

17.1 This policy will be reviewed at least every 3 years to ensure it continues to comply with legislative and regulatory requirements.

Appendix 1

Our Auditors

Internal Auditors: Wylie & Bisset

Contact: Stephen Pringle Stephen.pringle@wyliebisset.com

External Auditors: Chiene & Tait

Contact: Jeremy Chittleburgh Jeremy.Chittleburgh@chiene.co.uk

Appendix 2

Fraud Response Plan

1. Introduction

- 1.1 The purpose of this Plan is to outline the steps to be followed in the event of a suspected fraud. It provides a consistent framework for investigating and reporting fraud by defining authority levels, responsibilities for action and lines of reporting. This Plan should be read in conjunction with Rosehill's Prevention of Fraud and Anti-Bribery Policy and Whistleblowing Policy.

2. Initiating Action

- 2.1 Suspicion of fraud may be captured through a number of means. This includes internal audit work, external audit, or incidences of whistleblowing. In all cases the Director should be alerted to the matter without delay. In the Director's absence, another member of the Management Team should be informed, and they will inform the Chair of the Management Committee. In the case where the Director is suspected, the Chair must be advised immediately.
- 2.2 The Director (or in her absence, another member of the Management Team) shall, as soon as possible and normally within 24 hours, convene a meeting of the Fraud Response Group. This Group shall normally comprise the Director, Finance Manager and Chair of the Management Committee. The Group has the task of deciding on initial action to be taken. This action will normally involve:
- engaging the internal auditor to act as Investigating Officer and undertake an investigation;
 - informing external auditors of the matter, and agreeing arrangements for keeping the external auditors informed about the work of the Group;
 - considering how to secure records/assets and prevent further loss;
 - considering the membership of the Fraud Response Group, and the need to involve other members of the Management Team. This will typically be determined by the area of business where the alleged or suspected fraud has taken place;
 - seeking expert legal advice from Rosehill's solicitors, as required;
 - confirming responsibilities and arrangements for submitting relevant regulatory notifications;
 - confirming requirements and arrangements for notifying funders.

- 2.3 The Director should advise the Chair of the Committee as soon as an investigation under this procedure has been initiated.

3. Preliminary Investigations

- 3.1 The Investigating Officer must conduct an initial information gathering exercise to enable the circumstances to be investigated rigorously, confidentially and without undue delay. They should thereafter report their initial findings to the Fraud Response Group, any interim conclusions and provide an action plan to guide the full investigation if this is the recommended course of action.
- 3.2 The Fraud Response Group will consider the Investigating Officer's report, but the information will not be disclosed or discussed with anyone else who does not have a legitimate need to know. In cases where an individual is suspected of fraud, which a subsequent investigation does not substantiate, every effort must be made to minimise potential damage to the individual's reputation.

4. Involving the Police

- 4.1 Where preliminary investigations establish that there are reasonable grounds to suspect that fraud has taken place, it is Rosehill's policy to pass details directly to the Police, normally without undue delay and prior to any further internal investigation. The Director will notify the Chair of the Committee of this action.
- 4.2 The Police will lead any further investigations from this stage. All employees are required to co-operate fully with Police enquiries in this regard. The Director will establish and maintain appropriate lines of communication with the Police.
- 4.3 The provisions of this Plan apply in full in cases where external frauds, perpetrated by third parties, are identified or suspected and there is any suspicion of collusion of staff members.
- 4.4 In all other cases of suspected external fraud the Director, in consultation with the Fraud Response Group and Chair of the Committee, shall normally report the matter to the police without delay.
- 4.5 A major objective in any fraud investigation will be the punishment of any perpetrator, to act as a deterrent to other potential perpetrators. Rosehill will follow its Disciplinary Policy and Procedures in dealing with of any member of staff who has committed fraud; and will normally pursue the prosecution of any such individual.

5. Subsequent Investigations

- 5.1 Where preliminary investigations provide reasonable grounds for suspecting a member or members of staff of fraud, the Fraud Response Group will decide whether there is a requirement to suspend the suspect(s). It will do so, with reference to Rosehill's Disciplinary Policy and Procedure. It may be necessary to plan the timing of suspension to prevent the suspect(s) from destroying or removing evidence that may be needed to support disciplinary or legal action.
- 5.2 In these circumstances, the suspect(s) should be approached unannounced. They should be supervised at all times before leaving Rosehill's premises. They should be allowed to collect personal property under supervision but should not be able to remove any property belonging to Rosehill. Any keys to premises, offices and furniture should be returned.
- 5.3 Rosehill's IT providers should be instructed to withdraw, without delay, access permissions to Rosehill's computer systems. The suspect(s) should be requested to hand over all IT and communications equipment provided to them by Rosehill, including laptops, mobile telephones, and other devices.
- 5.4 If no suspension takes place following preliminary investigations, the Fraud Response Group should review this at subsequent stages of the ensuing investigation.
- 5.5 The Investigating Officer shall consider whether it is necessary to investigate systems other than that which has given rise to suspicion, through which the employee may have had opportunities to misappropriate Rosehill's assets. In consultation with the Fraud Response Group they will also determine whether there is a need to collect additional information in order to provide an appropriate level of evidence.
- 5.6 Dependent on the nature of the suspected fraud, the investigation may require technical expertise that the Investigating Officer does not possess. In these circumstances, the Fraud Response Group has responsibility for the appointment of external specialists to lead or contribute to the investigation.
- 5.7 Any requests for information from the press or other external agency concerning any fraud investigation must be referred to the Director. Under no circumstances should the Investigating Officer or any other employee provide statements or information to the press or external agencies.

6. Recovery of Losses

- 6.1 The Investigating Officer shall ensure that the amount of any loss is quantified wherever possible. Repayment of losses will be sought in all cases. Where the loss is substantial, legal advice should be obtained without delay about the need to freeze the suspect's assets through the court, pending conclusion of the investigation. Legal advice should also be obtained about prospects for recovering losses through the civil court, where the perpetrator refuses repayment. Rosehill will normally expect to recover costs in addition to losses.
- 6.2 The Investigating Officer, in discussion with the Director should also decide whether any of the losses warrant a claim under any current insurance policy. Action to recover losses via insurance will normally only be taken as a last resort.

7. Investigation Report

- 7.1 On completion of a fraud investigation, the Investigating Officer will submit a written report to the Fraud Response Group. If a fraud has been established, the report shall contain:
- a description of the incident, the people involved, and the means of perpetrating the fraud;
 - the measures taken to prevent a recurrence;
 - quantification of losses;
 - progress with recovery action;
 - progress with disciplinary action;
 - progress with criminal action;
 - actions taken to prevent and detect similar incidents.
- 7.2 The report will normally be submitted to the next meeting of the Management Committee. Where the fraud is significant, in terms of losses incurred, or particularly novel, unusual or complex, a special meeting of the Management Committee may be convened. The Management Committee will consider all matters and relevant management responses. This will include details of lessons learned or recommendations to improve controls.

8. Review of the Fraud Response Plan

- 8.1 As a minimum, the Plan will be reviewed every three years to ensure fitness for purpose. It will also be reviewed after any fraud incident in order to identify any need for change.

Appendix 3

Fraud Register

Please provide a summary of the actual / suspected fraud

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Please state the action taken by:

Rosehill

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The Police

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Please state the outcome of the detected / suspected fraud

Please state any control action required as a result of the fraud / suspected fraud

If financial loss has incurred please state how much this loss / estimated loss or potential loss was and the action taken to recover it.

Date reviewed by the Management Committee

Signature - Chair of Management Committee

Date:

Signature - Director:

Date:

Date reported to The Scottish Housing Regulator (where applicable):