



Blackpool Coastal
Housing

Anti-Fraud and Corruption Statement

July 2025

INSPIRING PEOPLE TO BUILD **BETTER COMMUNITIES**

Document Information

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Scope of Document	Policy Statement	
Objective	To send out a strong deterrent message with regard to fraud and corruption both internal and external, and detail the key arrangements to uphold anti-fraud governance and to investigate any issues that arise.	
Documentation		
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Amendment Record

Date	Issue No.	Section/Page	Details of Change	Authorised By:
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3.0	24/6/2025		Full review	Vikki Piper

Amendment Notes

- Documents at draft status are to use letter designations to denote issue status: a,b,c etc.
- Documents at full issue status are to use number designations to denote issue status after full revision: 1.0, 2.0, 3.0, etc.
- For an amendment to a full issue document you are to use number designation to denote issue status: 1.1, 1.2, 2.1, etc.
- On full issue the draft amendment record should be deleted from the above table.
- Notification of the amendment must be sent to the person maintaining the Central Register.

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Introduction

Blackpool Coastal Housing (BCH) is committed to the prevention of fraud and corruption. It is important to BCH to use its income and resources in the most effective way for the delivery of high quality services to the community. BCH requires all employees, board members, tenants and partners to act honestly and with integrity, and to safeguard the public resources for which they are responsible. BCH also expects the same levels of honesty and integrity from all individuals and companies dealing with the organisation and will take suitable action when fraud or corruption is suspected.

The purpose of this statement is to set out the procedures to be followed where fraud or corruption is suspected or detected. It applies to BCH staff and all other parties who are given access to the organisation's information and premises. It covers all personnel including freelance, casual and temporary agency staff, contractors and board members.

Senior management and board members are also expected to deal effectively with any potentially fraudulent or corrupt activity that comes to their attention.

BCH can be the victim of a variety of frauds, bribes or corrupt acts from time to time. Examples of actions that are considered to be fraud, bribery or corruption are as follows (this list is by no means exhaustive):

- Theft of any BCH property;
- Theft of time, including abuse of agile working opportunities;
- Accepting or receiving a bribe (covered by detailed anti-bribery arrangements);
- Obtaining benefit not entitled to, e.g. tenancy fraud;
- Forgery or alteration of any document, e.g. an electronic invoice;
- Destruction or removal of records;
- Acceptance of goods and services as an inducement to giving work to any supplier;
- Falsifying expense claims;
- Disclosing confidential information to outside parties without authority for personal gain;
- Use of BCH's assets and facilities for personal use.

BCH endorses the Council's response for counter fraud activity is based on the principles of govern, acknowledge, prevent, pursue and protect in line with the current Fighting Fraud and Corruption Locally Strategy (2020). This consists of the following:

Govern	Acknowledge	Prevent	Pursue
Having robust arrangements and executive support to ensure anti-fraud, bribery and corruption measures are embedded throughout the organisation.	Acknowledging and understanding fraud risks and committing support and resource to tackling fraud in order to maintain a robust anti-fraud response.	Preventing and detecting more fraud by making better use of information and technology, enhancing fraud controls and processes and developing a more effective anti-fraud culture.	Punishing fraudsters and recovering losses by prioritising the use of civil sanctions, developing capability and capacity to investigate fraudsters and developing a more collaborative and supportive local enforcement response.
<p>PROTECTING BCH AND RESIDENTS</p> <p>Recognising the harm that fraud can cause in the community. Protecting the organisation, tenants and other customers from fraud.</p>			

The Charter seeks to embed the 6 C's for effectively implementing an anti-fraud ethos throughout the Council, being:

- **Culture** – creating a culture where fraud, bribery and corruption are unacceptable.
- **Capability** – assessing the full range of fraud risks and ensuring that the range of counter fraud measures deployed is appropriate.
- **Capacity** – deploying the right level of resources to deal with the level of fraud and error risk, and that is monitored by those charged with governance.
- **Competence** – having the right skills and standards commensurate with the full range of counter fraud, error, bribery and corruption activity.
- **Communication** – raising awareness both internally and externally, deterring fraudsters, sharing information, and celebrating success.
- **Collaboration** – working together across internal and external boundaries (with colleagues, other local authorities, and other external agencies), sharing resources, skills, learning, good practice, innovation, and information.

BCH rules relating to fraud and corruption

BCH employees are expected to abide by the National and Local Conditions of Service relating to their employment, which include conduct issues. Employees are also expected to follow any code of conduct related to their profession where these require a further duty of care. All board members and employees are required to declare any offer or receipt of gifts or hospitality that are in any way related to their relationship with BCH. A hospitality register is maintained of all declarations. A register is also maintained for officers to declare any

business or related interests, membership of, or associations with, clubs, societies and other organisations.

Senior management have a role in ensuring that BCH takes adequate steps to safeguard against the risk of bribery. An anti-bribery policy is in place and periodically reviewed.

Directors must make sure that all staff have access to these rules and regulations and that staff receive suitable training where appropriate. Board members and employees must make sure that they read, understand and comply with the rules and regulations that apply to them.

Should any person knowingly break the rules and regulations then BCH may take formal action. In the case of staff this could ultimately lead to dismissal. If senior management or the board fail to take adequate precautions to reduce the risk of bribery this could also lead to a potential criminal conviction under the terms of the Bribery Act.

Fraud and Corruption Reporting

It is the responsibility of everyone to be alert for occurrences of fraud, bribery and corruption and to be aware that unusual events, transactions or behaviours could be indications of fraud (or attempted fraud) and corrupt practices. Fraud, bribery and corruption may also be highlighted as a result of specific management checks, by a third party, or in the course of audit reviews by both internal and external audit.

Service managers are responsible for maintaining an adequate framework of internal control to minimise potential losses by the organisation. The Internal Audit Service is available to provide advice and assistance in this area, but service management retain responsibility for preventing and highlighting possible fraudulent and corrupt activity.

Any suspicion of fraud will be taken seriously. If you become aware of a suspected fraud or irregularity you should report it to either:

- your line manager;
- your head of service or director;
- BCH's Internal Audit Advisor via the Director of Resources;

or via the whistleblowing procedure.

When a member of staff reports suspicions to their line manager or head of service, their information should be taken seriously, and they should be dealt with in a considerate way. Managers receiving the information should report it to the Director of and Resources as soon as possible so that a decision can be made about the need for an investigation.

Confidentiality for all parties will be maintained over reports made in good faith which cannot be substantiated following investigation. A reporting member of staff may choose to remain anonymous and such anonymity will be respected. However, identification is preferred and will assist the investigation. An anonymous disclosure cannot be made under the Public Interest Disclosure Act 1998 (the 'Whistleblowing Act'); staff must identify themselves to receive protection under the Act.

Employees must not do any of the following:

- contact the suspected individual in an effort to determine facts or demand restitution;
- discuss the case facts, suspicions, or allegations with anyone outside BCH (including the press) unless specifically asked to do so by the Director of Resources or Chief Executive;

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- discuss the case with anyone within BCH other than the people listed above and those directly involved in any investigation (i.e. HR staff and appointed investigating and link officers);
- attempt to seize paperwork or other evidence.

Prosecution Policy

Whenever possible, BCH will act against all perpetrators of fraud and corruption, whether internal or external to the organisation.

In cases of internal fraud and corruption the relevant service director will decide whether to take disciplinary action. Cases of internal or external fraud and corruption, where there is potentially sufficient evidence for a criminal prosecution, will always be referred to internal audit for a decision to be made as to whether to refer the case to the police. These decisions will be based on the Council's Sanctions and Prosecutions Policy as set out in their Fraud and Error Prevention Charter.