



Fraud Management Framework

May 2026

Lead Officer: Head of Finance

<u>Version No.</u>	<u>Purpose/Changes</u>	<u>Approval Date</u>	<u>Approved By</u>	<u>Suggested Review Date</u>
6.0	Full review	20/05/2026	Ongo Homes Board	2029/2030
5.0	Annual review	10/11/2021	ELT	December 2024
4.0	Full review	16/09/2020	Group Common Board	September 2021
3.0	Health Check	1/6/2016	Director of Resources	February 2017

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1. Our policy is...

- 1.1 Fraud legislation makes committing fraud or failure to prevent fraud a criminal offence. Ongo are committed to preventing fraud in order to comply with legislation and to minimise the impact on the organisation.
- 1.2 At Ongo, we operate a zero-tolerance approach to fraud and expect all colleagues and stakeholders to conduct business in a non-fraudulent way. Such conduct could have catastrophic effects on the business in terms of finance, customer / stakeholder confidence and reputation.
- 1.3 We are committed to the highest legal, ethical and moral standards. This policy makes clear our stance on prevention, control, detection, and response to fraud.
- 1.4 Fraud is an issue that all organisations may face regardless of size, industry or country. The term 'fraud' commonly includes activities such as theft, corruption, conspiracy, embezzlement, money laundering, bribery and extortion. In the modern era there is a heightened risk of attempted fraud by unconnected external parties, particularly using IT scams.
- 1.5 For each of the different ways of perpetrating fraud, the common theme is that a person has acted dishonestly with the intent to make a gain for themselves, Ongo or a third party, cause loss to Ongo or a third party, or expose Ongo or a third party to a risk of loss.

2. It applies to...

- 2.1 This policy applies to all areas of the Ongo group including Ongo Recruitment, Ongo Roofing Ltd. (trading as Ashbridge Roofing Solutions), and Ongo Heating and Plumbing Ltd, (trading as Hales & Coultas) and Trent Valley Electrical Services (TVES).
- 2.2 The policy applies to any irregularity, or suspected irregularity, involving our colleagues and any other parties, including any associated persons.
- 2.3 The policy includes tax evasion as a fraudulent activity under the Criminal Finances Act 2017. We recognise that Ongo is criminally liable for failing to prevent the facilitation of tax evasion (in the UK or overseas) regardless of whether management are involved or aware.
- 2.4 This policy is also in place to ensure we have measures in place to prevent fraud in line with the requirements of Economic Crime and Corporate Transparency Act 2023 (ECCTA). We recognise that Ongo may be criminally liable where an

associated person commits a fraud intending to benefit Ongo and Ongo did not have reasonable fraud prevention measures in place.

2.5 Anti-money laundering and bribery are identified as fraud and are specified under the Anti-Money Laundering Policy and the Probity Policy.

2.6 This policy does not include measures to prevent tenancy fraud. This is addressed in our Tenancy Management Policy.

3. Because we want to...

3.1 The aims of this policy are:

- To prevent and detect fraud and to minimise the impact on the organisation
- To make clear who is responsible for the management of alleged fraud, fraud prevention and detection
- To ensure all colleagues and associated persons have an understanding of what fraud is
- To equip colleagues and associated persons with the knowledge to identify suspected fraud and raise any concerns in the appropriate way
- Define the way we manage suspected and alleged cases of fraud
- To address the main categories of fraud that affect organisations as identified by the Association of Certified Fraud Examiners (ACFE)
- To comply with relevant legislation

4. We will...

4.1 Responsibility

4.1.1 The Board and Executive Leadership Team hold primary responsibility for fraud prevention and detection at Ongo.

4.1.2 Our stance on responsibility and accountability in respect of fraud is that colleagues at all levels and our Board Members lead by example in ensuring adherence to legal requirements, rules, procedures and practices.

4.1.3 The Ongo Homes Board is ultimately responsible for the group's system of internal control and for reviewing its effectiveness. The overall responsibility for our system of internal control is at the highest level in the organisation in line with the Companies Act. Directors are responsible for maintaining adequate accounting records. The NHF Code of Governance prescribes that *'The board must establish a formal and transparent arrangement for considering how the organisation ensures financial viability, maintains a sound system of internal controls, manages risk and maintains an appropriate relationship with its*

auditors.’ This includes procedures designed to minimise the risk of fraud occurring.

- 4.1.4 The Director of Resources and Commercial Services has a statutory responsibility to ensure the proper conduct of the Group’s financial affairs, and to ensure that all colleagues are aware of this framework and are suitably trained.
- 4.1.5 It is everyone’s responsibility across Ongo and any associated persons, to be alert to and report any confirmed cases of fraudulent or corrupt acts.
- 4.1.6 All managers and colleagues have a duty to familiarise themselves with the types of improprieties that might be expected to occur within areas of responsibility and to be alert for any indications of irregularity.
- 4.1.7 We manage the risk of fraud in line with our corporate Risk Management Framework. It is essential that risk assessments are undertaken and maintained to identify the likelihood and impact of fraud across the businesses. Controls will be identified and effectiveness tested on an ongoing basis.
- 4.1.8 The effectiveness of fraud controls are tested within our Internal Audit programme. An annual opinion will be provided assessing if adequate controls are in place and are effective and working appropriately.
- 4.1.9 Individuals, and organisations (e.g. suppliers, contractors, service providers, or any other associated persons) that we come into contact with, will act with integrity and refrain from thought or actions that could result in fraud or corruption.

4.2 **Categories of Fraud**

- 4.2.1 The three main types of fraud are categorised below:
 - a) **Asset misappropriation** – the theft or misuse of Ongo’s assets;
 - b) **Fraudulent statements** – this is usually in the form of falsification of financial statements in order to obtain some form of improper benefit;
 - c) **Corruption** – this includes activities such as the use of bribes or acceptance of ‘kickbacks’, improper use of confidential information, conflicts of interest, collusive tendering and tax evasion

4.3 **Preventing Fraud**

- 4.3.1 The Board recognises that no systems of internal control can provide absolute assurance or eliminate all risk. We ensure that systems and procedures incorporate efficient and effective internal controls, and internal checking procedures. In line with the Delegations Framework, the Chief Executive and

Directors must ensure that these controls are properly maintained and are effective. The existence, appropriateness and effectiveness of these internal controls is independently monitored by the Internal Audit Service.

- 4.3.2 A sound system of internal control cannot provide complete protection against all fraudulent behaviour, highlighting the importance of other fraud prevention and fraud detection measures.
- 4.3.3 To help prevent fraud it is essential for fraud awareness to be part of the Ongo culture. Appropriate Codes of Conduct are in place for Board Members, colleagues, involved tenants and other associated persons that prescribe appropriate best practice. Individuals are expected to follow any additional Codes related to their personal Professional Institute or Body where applicable.
- 4.3.4 Colleagues must disclose any pecuniary interests in the Companies' contracts, and the acceptance or the non-acceptance of any fees or rewards whatsoever other than their proper remuneration in line with the Probity Policy.
- 4.3.5 Ongo have Standing Orders and a Delegations Framework, which incorporates the Financial Regulations, in place that must be followed by all colleagues and Board Members.

4.4 Detecting and investigating fraud

- 4.4.1 All alleged cases of fraud or corruption will be investigated in line with the Fraud Management guidance that underpins this policy.
- 4.4.2 All alleged cases will be dealt with promptly, ensuring security and confidentiality of those involved and any evidence collected.
- 4.4.3 Under no circumstances should anyone involved in an investigation speak to representatives of the press, TV, radio or to another third party about a suspected fraud without the express authority of the Chief Executive. Care needs to be taken to ensure that nothing is done that could give rise to action for slander or libel.
- 4.4.4 Where financial impropriety is discovered, the presumption is that the police will be called in. The Crown Prosecution Service determines whether prosecution will be pursued. Referral to the police is a matter for the Chief Executive. Referral to the police will not prohibit action under disciplinary procedures.

4.5 Whistleblowing

4.5.1 Whistleblowing is the confidential raising of problems within an organisation. It is never easy to report a concern, particularly one that may relate to fraud or corruption by a colleague, partner, associated persons or a service-user and individuals may wish to do so anonymously in line with our Whistleblowing Policy. Further advice on reporting can be obtained from [Protect](#), an independent organisation dealing with probity and integrity in the workplace. Their telephone number is [020 3117 2520](tel:02031172520).

5. Making sure we do what we say...

- 5.1 All colleagues across the business are required to read and understand this Framework and the associated Guidance. This will be made available to everyone through the internal online learning platform.
- 5.2 We have a clear network of systems and procedures to assist in the fight against fraud and corruption. It is determined that these arrangements will keep pace with any developments in both preventative and detection techniques regarding fraudulent and corrupt activity.
- 5.3 Ongo is committed to vigorously pursuing fraud and serious abuse of powers, both through internal disciplinary procedures and the Courts as required.
- 5.4 Fraudulent activity will, in normal circumstances, be reported to the Police, and any decision to prosecute will be made by the Police and the Crown Prosecution Service.
- 5.5 Any instances of suspected fraud where the initial findings have some substance, will be reported to our Audit & Risk Committee, our Auditors and other relevant agencies, including our regulatory duty to report our fraud register to the Regulator for Social Housing (RSH) annually.

6. Other things to bear in mind...

- 6.1 This policy also links to our:
- Fraud Management Guidance
 - Employee Code of Conduct
 - Board Member Code of Conduct
 - Contractors Code of Conduct
 - Volunteers Code of Conduct
 - Recruitment & Retention Policy & Guidance
 - Probity Policy
 - Delegations Framework
 - Anti Money Laundering Policy
 - Whistleblowing Policy

- Disciplinary Policy & Guidance
- Information, Security & Acceptable Use Policy
- Credit Card Policy
- Procurement & Tendering Policy & Procedures
- Group Money Handling Policy and Procedure
- Payment Request Procedure
- Risk Register
- Contract Management Framework
- Fraud Risk Assessment

6.2 The main pieces of legislation and regulation relevant to this policy include:

- Regulator for Social Housing Regulatory Framework - **Chapter 3 – Standards for Registered providers: Economic Standards.**
- UK Law and Statutes
- The Fraud Act 2006
- Companies Act 2006
- Bribery Act 2010
- Money Laundering Regulation Act 2017
- Criminal Finances Act 2017
- Economic Crime and Corporate Transparency Act 2023
- Theft Act 1968
- Proceeds of Crime Act 2002
- Serious Crime Act 2007
- Data Protection Act 2018/ UK GDPR

6.3 External scrutiny of our affairs is carried out by a variety of bodies including:

- The Regulator for Social Housing (RSH)
- The Housing Ombudsman
- Internal auditors
- External auditors

7. We'll look at this again...

7.1 This policy will be reviewed on a three-year cycle unless any regulatory or legislative changes occur and have an impact on this policy.

Definition	
Associated person/s	Anyone performing services for or on behalf of Ongo, including employees and agents, as well as contractors, consultants, or any other third party acting in a service capacity for the Group. The definition covers anyone who performs services for or on behalf of the Group, with liability determined

	by the <i>circumstances</i> of the relationship, not just contractual labels.
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