

# Counter Fraud, Corruption and Bribery Strategy



## Introduction

Lafford Homes Ltd acknowledges its role in delivering services in a culture that promotes:

- The recognition that fraud and corruption has for Lafford Homes Ltd and the potential for savings from managing these risks;
- The importance of preventing fraud, corruption, bribery, theft and the facilitation of criminal tax evasion to ensure that Lafford Homes Ltd has the resilience to with stand the threats these bring;
- The requirement for honesty, integrity, accountability and the assurance of a high standard of public life.

To achieve the aims of this role, Lafford Homes Ltd adopts a zero tolerance approach to all forms of fraud, corruption, bribery, theft and facilitation of criminal tax evasion within the company and from external sources associated with Lafford Homes Ltd.

Lafford Homes Ltd recognises that fraud, corruption, bribery, theft and facilitation of criminal tax evasion:

- Undermines the high standards of the company;
- Diminishes the resources and services available to its tenants;
- Has consequences that reduces confidence in its activities and in Lafford Homes Ltd itself.

## Definitions – Fraud, Corruption, Theft, Bribery, Facilitation of criminal tax evasion

Fraud	<ul style="list-style-type: none"> <li>- a deliberate deception intended to provide direct or indirect personal gain, obtain an advantage, avoidance, obligation or cause loss to another party.</li> <li>- Includes criminal deception, forgery, blackmail, corruption, theft, conspiracy, covering up material facts, collusion.</li> </ul>
Corruption	<ul style="list-style-type: none"> <li>- the deliberate misuse of position for direct or indirect personal gain.</li> <li>- Includes offering, giving, requesting or receiving a bribe or reward to influence the actions of the participant or others.</li> </ul>
Bribery	<ul style="list-style-type: none"> <li>- an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.</li> <li>- The Bribery Act 2010 renders Senior Officers liable to conviction where they are deemed to have given consent or tacit approval to the giving or receiving of a bribe.</li> <li>- The Act also makes it an offence to bribe a foreign public official with the intention of gaining a business advantage.</li> </ul>
Facilitation of Criminal Tax Evasion	<ul style="list-style-type: none"> <li>- Includes deliberately or dishonest actions to facilitate the offence of criminal tax evasion ranging from actively helping the evasion to merely ignoring it.</li> </ul>
Theft	<ul style="list-style-type: none"> <li>- the stealing of cash or property belonging to someone else, taking such with no intention of returning it to the owner.</li> </ul>

Lafford Homes Ltd is committed to a culture of operating with the highest standards of openness, probity, honesty, integrity and accountability.

All Directors, employees and external partners are expected to adopt and apply these high standards, reflected in the Lafford Homes Ltd.'s Financial Procedures and other relevant policies adopted by the Lafford Homes Ltd.

In following this culture, Lafford Homes Ltd seeks to deter and prevent fraud, corruption, bribery and theft, but where there is suspicion or detection of such wrongdoing then thorough investigation will take place, with a consistent, balanced approach.

Where commitment of these elements of fraud are proven, appropriate sanctions will be applied with Lafford Homes Ltd seeking to recover all losses.

### **Scope**

The Counter Fraud, Corruption and Bribery Strategy applies to all Lafford Homes Ltd Directors and employees.

### **Aims and Objectives**

- To keep fraud and loss to an absolute minimum within Lafford Homes Ltd.
- To protect resources, ensuring they are used to improved services and not lost through fraudulent activity.
- To promote Lafford Homes Ltd.'s culture of a zero tolerance approach to fraud, corruption, bribery and theft.
- To ensure that the facilitation of criminal tax evasion does not occur.
- To provide an Internal Audit service which seeks to deter, prevent and detect fraud, corruption, bribery and theft, investigating suspected or detected fraud, corruption, bribery and theft, and formulates recommendations to improve policy, systems and controls to reduce the incidence of such fraudulent activity.

### **Summary of Principles**

- Zero tolerance of abuse of Lafford Homes Ltd.'s services or resources with a culture that expects high standards of propriety, integrity and accountability to all parties within the scope of this policy.
- Dedication of resources with appropriate training to provide a balanced, professional counter fraud approach.
- Recognition that under the Bribery Act 2010 that it is a criminal offence for an employee to request, receive, agree to receive, offer or give any gift, loan, fee, reward or advantage to any person in their official capacity.
- Operate within the Lafford Homes Ltd.'s Contract and Financial Procedure rules.
- The application of disciplinary, legal and/or criminal action against individuals involved in fraud, with investigations carried out with consistency, fairness, objectivity and equality.
- To be open to the reporting of genuine suspicious or fraudulent activity, but not tolerate malicious or vexatious allegations, which may lead to appropriate actions being taken against the accuser.

### **Reporting Avenues and Methods**

If it is genuinely believed that someone is committing a fraud or corrupt practices are suspected, these are the reporting options for Directors and employees:

- Phil Roberts, Chairman of the Board

*Lafford Homes Limited is a registered company in England & Wales 10313301. Its registered office is Council Offices, Kesteven Street, Sleaford. NG34 7EF. It is a wholly owned Company of North Kesteven District Council.*

Alternatively, Lafford Homes maintains a Whistleblowing Policy that contains contact details for Assurance Lincolnshire should someone wish to report independently.

- Telephone: 0800 0853716
- Email: [whistleblowing@lincolnshire.gov.uk](mailto:whistleblowing@lincolnshire.gov.uk)

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