



Craigdale
HOUSING ASSOCIATION

ANTI-FRAUD & BRIBERY POLICY

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Craigdale Housing Association can provide this document on request, in different languages and formats, including Braille and audio formats.

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1.0 Introduction

- 1.1 Craigdale Housing Association recognises that fraud is not a victimless crime and 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 The Board acknowledges its responsibility for ensuring that the risks associated with fraud and bribery are managed effectively across all parts of the Association.
- 1.3 Scottish Housing Regulator (SHR) expects Registered Social Landlord's (RSLs) to have robust procedures in place to minimise the risk of fraud, bribery, corruption or misappropriation being successful, and to safeguard the assets of the Association.
- 1.4 The Association takes recognition of all of the SHR Regulatory Standards of Governance and Financial Management and in particular Regulatory Standards 4.3 and 5.6:
 - **Regulatory Standard 4.3 states:**
“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”
 - **Regulatory Standard 5.6 states:**
“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”.
- 1.5 The Association plays an important role in the Castlemilk area, and any instances of fraud or corruption could be damaging for its reputation, cause unnecessary expense and weaken customer service. Losses due to fraud, theft or corrupt practices would have a direct effect on the level and quality of service provision. 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 can often be dramatic. Staff morale and the level of confidence of tenants, owners, partners, suppliers, our lenders and SHR may decline as a result of fraud.
- 1.6 Craigdale Housing Association 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 and bribery.
- 1.7 This policy sets out the responsibility of all staff and Board members regarding the prevention of fraud and action to be taken where fraud is suspected or detected.
- 1.8 The Association requires that all staff and Board members act honestly and with integrity at all times and to safeguard the resources for which they have responsibility. It should be considered that fraud is an ever-present threat and must be considered a concern of all staff and Board members.
- 1.9 The Board adopts a counter fraud and corruption strategy by addressing any risks and having a clear identification of responsibility and accountability for the implementation of robust and appropriate internal controls and security measures.

2.0 Policy Objectives

2.1 The key objectives are:

- Govern – have robust arrangements and Board and Senior Management 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.
- Prevention – reduce the risk of Fraud and Bribery from occurring.
- Detect – discover Fraud and Bribery when it occurs.
- Respond – take corrective action and remedy the harm caused by fraud and bribery; and
- Protecting against serious and organised crime, protecting the organisation and individuals from becoming victims of crime and protecting against the harm that fraud can do to the community.

2.2 The policy is intended to provide the necessary arrangements to reduce fraud and bribery to an absolute minimum by its staff members, Board members, contractors, agents and other associated persons. Breaches of this policy are likely to constitute a serious disciplinary, contractual and/or criminal action for the individual(s) concerned.

2.3 The Association will take firm and forceful action where appropriate against any individual or group committing a fraud against the Association.

2.4 The Association will take firm and forceful action where appropriate against any individual or group offering or receiving a bribe or failing to prevent a bribe being paid on the Association's behalf or by an associated person.

2.5 The Association encourages employees to be watchful and to report any suspicion of fraud or bribery and to use techniques such as data matching to validate data.

2.6 The Association will thoroughly investigate instances of alleged fraud or bribery and pursue those committing fraud or bribery and will apply sanctions where appropriate.

2.7 The Association will seek restitution of any asset fraudulently obtained together with recovery of costs.

2.8 The Association will assist the police and other appropriate authorities in the investigation and prosecution of those suspected of fraud or bribery.

2.9 The Association will ensure that all concerns are properly investigated and staff and Board members (particularly those reporting their suspicions), are protected from reprisal and/or victimisation. Following proper investigation, it may be necessary to instigate disciplinary action, civil or court proceedings including steps to recover any losses incurred.

2.10 All instances of actual or suspected fraud or bribery will be reported in detail to the Board. Irrespective of any actual occurrence or not, fraud, bribery or corruption will be an agenda item for the Board annually.

- 2.11 This policy and the associated procedures are designed to be consistent with the Association's Conditions of Service and Code of Conduct, in particular all elements of the disciplinary procedures. In the case of any inconsistency, the disciplinary procedures will be deemed to take precedence, unless advised to the contrary by the police or other external investigating body.
- 2.12 This policy also extends to include fraud committed by third parties such as tenants, residents, contractors and suppliers against other third parties such as local authorities, contractors and suppliers.

3.0 Fraud, Bribery, Corruption, Money Laundering & Cyber Crime

3.1 Definition & Examples:

- Fraud is a type of criminal activity, and is defined as: "Abuse of position, or false representation, or prejudicing someone's rights for personal gain".
- Fraud can be defined as 'any act of willful 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.

3.2 In Scotland, criminal fraud is mainly dealt with under common law and a number of statutory offences and can include common law fraud, embezzlement and statutory fraud.

3.3 Some examples of fraud that may be perpetrated against the Association are:

- Breach of bank mandates, theft of cash or use of "fictitious" bank accounts
- Excessive / unjustified allowances paid after improvement works
- 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 the associations staff or Committee members, for example in the procurement of goods or services
- Collusion with customers/suppliers
- Claims for payment of maintenance works that haven't been completed / don't exist / are exaggerated / are excessive
- Claims for payment of supplies that have not been provided
- Falsification of expenses and invoices
- Falsification of flexi sheets, annual leave, sick or special leave 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
- Misuse of any assets, including, ICT and/or breach of ICT security and cybercrime
- Non-return of duplicate payments or overpayments
- Tenancy fraud
- Use of company data for personal gain; and
- 'CEO Fraud' or 'Whale Phishing' whereby email scams impersonate individuals with access to financial information or other sensitive data into making bank transfers or

divulging highly valuable data. This can often come in the guise of an email from a colleague connected with the organisation, such as the Chief Executive Officer, Chairperson or Finance Agent/Manager and may come from an email address which is only one character different to the correct email address.

The above list is not exhaustive.

3.4 Bribery

Bribery is a specific form of corruption which is subject to the Bribery Act 2010. Bribery, for the purposes of that Act includes offering, promising or giving another person a financial or other advantage as an inducement or reward for performing their functions or activities improperly.

3.5 Staff and Board members should be aware that gifts, including hospitality, offered by contractors, suppliers and service providers may place them 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 line with the Association's Entitlements, Payments and Benefits Policy.

3.6 There are four bribery offences set out on the Act (set out below). Where any one of these is committed by any person associated with the Association, the Association as a whole may also be held responsible.

3.7 The four bribery related offences are as follows:

- a) **Bribing another person:** under Section 1 of the Act, a person is guilty of this offence where that person "promises or gives a financial or other advantage to another person" to "induce a person to perform improperly a relevant function or activity" or "to reward a person for the improper performance of such a function of or activity"
- b) **Accepting a bribe:** under Section 2 of the Act, a person is guilty of this offence where that person "requests, agrees to receive or accepts a financial or other advantage intending that, in consequence, a relevant function or activity should be performed improperly", (an offence may still have been committed if a bribe is promised or requested or there is agreement to accept a bribe, even if that bribe is not then actually made and / or accepted);
- c) **Bribing a foreign public official:** under Section 6 of the Act, a person is guilty of this offence where that person bribes a foreign public official and the person's intention is to influence that public foreign official in his/her capacity as a foreign public official" and to "obtain or retain...business" or "an advantage in the conduct of business". (This is unlikely to be relevant in the context of the Association's business, however, it is noted here as it is a relevant offence)
- d) **Failure to prevent bribery:** under Section 7 of the Act, a commercial organisation ("A") is guilty of this offence where "a person...associated with A bribes another person intending...to obtain or retain business for A, or...to obtain or retain an advantage in the conduct of business for A".

3.8 The bribery offences are criminal offences and dependent on the severity of the offence, are punishable by harsh penalties including unlimited fines and sentences of up to 10 years imprisonment. In some cases, both a fine and a prison sentence may be imposed.

3.9 Corruption

Corruption is the offering, giving, soliciting or acceptance of an inducement or rewards which may influence the action of any person. It can include, for example, engaging in personal transactions which might affect the Association where it is not disclosed. It can also include theft or unauthorised circulation/reproduction of confidential documents or information, including financial information.

3.10 Money Laundering

Money Laundering involves the concealment, conversion, disguise and transfer of criminal property. Criminal Property is money or other property that represents a person's benefit from a criminal activity that you know, or suspect represents such a benefit. Money laundering should be considered as an activity to which this anti-fraud policy and associated procedures should apply.

3.11 Cyber-crime

The Computer Misuse Act 1990 is a law in the UK that makes illegal certain activities, such as hacking into other people's systems, misusing software, helping a person to gain access to protected files on someone else's computer or introducing malware into computer systems (viruses, Trojans, spyware etc.)

4.0 Fraud Prevention, Detection and Reporting

- 4.1 The Association has established a system of internal controls, policies and procedures, in an effort to deter, prevent and detect fraud and corruption.
- 4.2 All new employees (including temporary and permanent) are asked to provide details of any current unspent criminal offences in the Association's employment application form. The Association may verify details provided in the application form including references and educational checks, disclosure and will be in accordance with the Association's Recruitment Policy.
- 4.3 All suppliers and contractors must be in good standing and subject to screening by the Association and references obtained and verified.
- 4.4 All contractual agreements with the Association will contain the provision prohibiting fraudulent or corruptive acts and will include information about reporting fraud and corruption.
- 4.5 At a strategic level, the key elements of tackling this risk involve:
 - Developing and maintaining an anti-fraud culture
 - Creating a strong deterrent effect
 - Preventing fraud by designing weaknesses out of processes and systems
 - Detecting fraud, where it is not prevented
 - Investigating suspicions of fraud in an expert, fair and objective manner
 - Seeking to apply a range of sanctions where fraud is believed to be present
 - Seeking redress and recovery of any losses that are incurred; and

- Ensuring the Association has appropriate insurance in place.

4.6 Central to this anti-fraud culture is a range of operational policies, systems and procedures that are designed to deter, and enable detection and reporting of fraud. In particular, this includes:

- Financial Regulations and Procedures, Treasury Management, and the controls detailed therein
- Standing Orders and other governance related policies, covering matters including Whistleblowing, Code of Conduct, Disclosure of Interest; and the associated management systems; and
- Service based policies, guidance and operating procedures covering tenancy related matters; repairs and maintenance activities; procurement and staff recruitment.

4.7 An anti-fraud culture shall be nurtured throughout the Association.

4.8 Prevention of Fraud, Corruption and Bribery is assisted by the following controls:

- Clear statements of the role, responsibility and limits of each post in the relevant job description
- Thorough recruitment processes, including references from previous employers and Disclosure Scotland checks
- Effective internal and financial controls, including segregation of duties where possible, control of signatories and custody of valuable assets, as documented in the Financial Regulations and supporting policy and procedure documents
- IT access controls, including to banking, cash collection, payroll, HR, purchasing and repair systems, and controls within systems on users' ability to create and record transactions; and
- Internal and external audit; and oversight of all these controls through the Board.

4.9 Established Internal Audit arrangements further support the detection of fraud through testing the appropriateness, adequacy, effectiveness and robustness of relevant policies and systems of internal financial and other controls. The External Auditor, through examination of financial statements, should identify any audit and accounting issues and the effectiveness of internal financial controls.

4.10 The primary responsibility for detecting fraud lies with senior staff 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 take the necessary steps to minimise the risk to the Association. Senior staff should ensure staff in their areas of operation are familiar with the common types of fraud.

4.11 The Association is not advocating the creation of an overtly suspicious environment but expects staff to be alert to the potential for fraud in areas where they operate.

4.12 Staff will often be the first to notice the potential for, or actual, fraud. Staff suspicious of fraud should report their concerns to their Line Manager, Chief Executive Officer or a member of the Board. This requirement to alert senior staff 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 a member of the Association's Board or contact our internal or external auditors directly.

The contact details for the auditors are:

External Auditors: CT Audit Ltd
Contact Person: Jeremy Chittleburgh
Contact: jeremy.chittleburgh@chiene.co.uk
Telephone No: 0131 558 5800

Internal Auditors: WBG Services LLP
Contact Person: Graham Gillespie
Contact: graham.gillespie@wyliebisset.com
Telephone No: 0141 566 7000

- 4.13 Where it appears that the fraud may have involved the Chief Executive Officer, the Chairperson should be notified immediately, who shall then contact both the internal and external auditors who will guide them accordingly.
- 4.14 Staff should not be dissuaded from reporting actual or suspected fraud as all cases will be treated in the strictest confidence. The Association is fully committed to supporting and protecting staff that raise legitimate concerns where possible. However, the Association cannot guarantee anonymity and may have to provide, for example, witness statements to assist with the investigation.
- 4.15 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. The Associations' Whistleblowing Policy contains further information on this.
- 4.16 Any action to prevent the reporting or any attempts at intimidation will be treated seriously and the Association will immediately report such action to the police.
- 4.17 The key SHR and Office of the Scottish Charity Regulator (OSCR) requirements relating to fraud are as follows:
- The Association acknowledges the requirement to report fraud, the investigation of fraud and instances of whistleblowing to SHR as a Notifiable Event. It shall report to SHR without delay, in accordance with the SHR guidance note.
 - The Association notes that where SHR is notified and makes regulatory enquiries, SHR may report to the OSCR, in accordance with legal provisions (The Charities and Trustee Investment (Scotland) Act 2005) and the associated Memorandum of Understanding between OSCR and SHR.
 - In addition to this, auditors have a statutory duty to report matters of "material significance" to OSCR. This includes "matters suggesting dishonesty or fraud involving a significant loss of, or a major risk to, charitable funds or assets."

5.0 Reporting Suspicions and Investigating Fraud

- 5.1 Details of such investigations will, by necessity, remain confidential, but management will ensure that the lessons learned from each incident are disseminated to the appropriate members of staff.

- 5.2 Fraudulent or corrupt activity 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 the Association'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, the Association will co-operate fully with the Police and pursue prosecutions where possible.
- 5.3 The Association may start its own investigation whilst any Police investigation is ongoing. The Association will follow its own disciplinary procedure if required.
- 5.4 Where dishonesty is detected then disciplinary procedures will be instigated and this may lead to dismissal of the individual concerned. The Association's auditors will be called in to carry out a fuller investigation and to provide independence in the investigation. In all cases, the Association will co-operate fully with those carrying out the investigation.
- 5.5 The Association will request that any staff member who is convicted of a fraudulent act whilst employed by the Association is to inform the Chief Executive Officer of the Association.
- 5.6 The Association will seek external advice and 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.
- 5.7 The Association will carry out a Risk Assessment of the position in line with recruitment best practice for the employment of ex-offenders.
- 5.8 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 advice or EVH consultation.
- 5.9 Failure to follow established procedures in relation to investigating fraud and interviewing the staff involved can invalidate disciplinary action and compromise the success of any future investigation and/or prosecution.

6.0 Fraud Register

- 6.1 All frauds, suspected or actual, will be recorded in the Fraud Register by the Chief Executive Officer, Corporate Manager, or Senior Housing Officer, and will be held electronically and password protected.
- 6.2 The fraud register will be reviewed by the Board and signed off annually by the Chairperson or earlier once a fraud (or suspected fraud) has been detected.
- 6.3 The Chief Executive Officer will be the lead officer in maintaining the register which will be reviewed and verified by the Corporate Manager and will show the following information:
- Date of entry in the register
 - Scope and circumstances arising; summary of what happened, alleged, detected, attempted fraud, corruption, and/or malpractice reported
 - Action taken by the Association and/or Police and when
 - Outcome of investigations and actions taken and the decision made
 - 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 external or internal auditor
- Date reported to SHR (all suspected or actual fraudulent activity is to be reported under notifiable events); and
- A page for two office bearers to sign following an annual inspection of the register.

6.4 Should any loss through fraud be sustained by the Association, the Board 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.

7.0 Responsibilities

7.1 Every staff and Board member should know that:

- You must not offer, promise or give bribes
- You must not allow yourself to be bribed
- You must not commit fraud by making false representation
- You must not commit fraud by failing to disclose information; and
- You must not commit fraud by abuse of position.

7.2 The prime responsibility for preventing fraud lies with all staff and Board members 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 awareness amongst staff
- Fostering an 'anti-fraud' culture
- Ensuring that if a fraud 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
- Being vigilant to possible indicators of fraud or attempted fraud, within their respective areas of work; and
- Acting with integrity and propriety, within the law, and in accordance with relevant policies, systems and procedures.

If any staff or Board member suspects or discovers fraud or bribery or its associated activities, then these should be reported as soon as possible.

7.3 The Board will receive reports and the Board will be made aware when any suspected or actual fraudulent activity has taken place. The minute of said meeting will also identify any weakness in internal controls and what action has been taken to address any weaknesses discovered.

The Board will review the internal audit reports. It will consider the report and its recommendations and decide what recommendations it will accept. The Management Team will be responsible for implementing the recommendations.

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

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

8.0 Risk Management

- 8.1 Whilst the Management Team are 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 and take the necessary steps to minimise the risk to the Association.
- 8.2 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.
- 8.3 Management also have 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.
- 8.4 The staff and Board members identify the risk of Fraud and Bribery and the importance of behaving with integrity in its governance and regulatory framework.

9.0 Internal Controls

- 9.1 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 manager to ensure controls within their areas of responsibility have been documented and communicated and operate effectively. The Association's Financial Regulations and Procedures assist in this process; however they are not the definitive record of the systems of internal control.
- 9.2 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.
- 9.3 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.
- 9.4 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 managers so that the need for the controls can be re-evaluated and amended.

10.0 Management controls/checks

- 10.1 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 are 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.

11.0 Corporate Governance

- 11.1 SHR monitors the Association's adherence to corporate governance requirements through their publication of the annual Regulatory Statement and also through reviews of various statutory returns.
- 11.2 Development of best practice and recommendations arising from the publication of documents such as 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.

12.0 Staff training

- 12.1 Staff 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.
- 12.2 The recruitment of suitable staff is the first defense in preventing fraud. Best practice recruitment policies such as detailed application forms including a statement on relevant unspent criminal convictions, written and verbal communication with referees and past employers and verification of educational and professional qualifications will be strictly adhered to.
- 12.3 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 and corruption; and
 - Regular staff updates regarding changes to control systems, policies and procedures.

13.0 Equalities and Diversity

- 13.1 The Association seeks to promote and achieve equality and diversity through the operation of an Equalities and Human Rights Policy, the requirements of which both in the letter and spirit will apply to this policy.

14.0 Monitoring and Reporting

- 14.1 The Association will use appeals, complaints, comments or suggestions from users of this policy to monitor its effectiveness. These will also be used to prompt a review of the policy where necessary.
- 14.2 An annual report on the Fraud Register will be presented to the Board or earlier if a suspected or attempted Fraud has taken place.

15.0 Other Related Policies

- Whistleblowing Policy
- Staff Code of Conduct, Committee Code of Conduct & Declarations of Interest
- Financial Regulations & Procedures
- Risk Management Policy
- Governing Body Code of Conduct; and
- Entitlements, Payments and Benefits Policy.

16.0 Terms of Reference

- Charities Statement of Recommended Practice (SORP) FRS102
- Scottish Housing Regulator (SHR) Regulatory Standards of Governance and Financial Management
- Scottish Federation of Housing Associations (SFHA) Internal Audit Guidance
- Internal Audit Reports
- Business Plan
- SFHA Charitable Model Rules 2020
- The Co-operative and Community Benefit Societies Act 2014
- OSCR Guidance for Charity Trustees
- Chartered Institute of Public Finance & Accountancy – Fighting Fraud and Corruption Strategy 2020
- Chartered Institute of Public Finance & Accountancy – Code of Practice on Managing the Risk of Fraud and Corruption; and
- Bribery Act 2010.

17.0 Policy Review

- 17.1 This policy will be subject to review at least every 3 years or earlier if a change in legislation occurs or monitoring or reporting reveals that the policy requires to be reviewed sooner.