

Tenancy Fraud Procedure

Applicable Company: Calico Homes

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Signed Off By: Homes SLT

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Tenancy Fraud Procedure

1. Purpose and Scope

1.1 This procedure sets out how Calico Homes staff will prevent, identify, investigate and take action on suspected tenancy fraud.

1.2 It supports the Tenancy Fraud Policy by providing a clear, consistent and operational approach to managing cases.

1.3 This procedure applies to:

- All Calico Homes employees involved in tenancy management
 - All suspected tenancy fraud relating to housing applications and live tenancies
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2. Key Principles

2.1 Calico Homes will adopt a structured approach to tackling tenancy fraud, including prevention, detection and enforcement, in line with sector good practice.

2.2 The approach will be underpinned by:

- A **zero-tolerance approach** to tenancy fraud
- **Timely, proportionate and evidence-based investigations**
- Fair treatment of customers, including consideration of **vulnerability and mitigating circumstances**
- Effective **partnership working and intelligence sharing**
- Compliance with **data protection and legal requirements**

2.3 Prevention will be prioritised as the most effective and cost-efficient way to reduce tenancy fraud.

3. Roles and Responsibilities

3.1 All staff are responsible for identifying and reporting suspected tenancy fraud.

3.2 Neighbourhood and frontline staff are responsible for:

- Identifying concerns
- Completing initial checks
- Recording cases on **Active H under Tenancy Fraud Case Management**

3.3 Managers are responsible for:

- Oversight of cases
- Supporting decision-making
- Approving enforcement and legal action

3.4 The **Tenancy Fraud Champion** is responsible for:

- Providing advice at the earliest stage of a concern
- Supporting consistent decision-making across teams
- Advising whether a case should progress to formal investigation
- Determining whether additional intelligence checks are required
- Supporting staff by carrying out where deemed appropriate checks through NAFN.
- Authorising and overseeing access to NAFN data services
- Ensuring use of intelligence is proportionate, lawful and supports case building

3.5 Staff will receive appropriate training to support the identification, reporting and investigation of tenancy fraud.

4. Process Overview

Stage 1: Prevention (Pre-Tenancy Checks)

4.1 Prevention is the most effective and cost-efficient way to reduce tenancy fraud risk.

4.2 Before allocating a property, staff will:

- Verify identity using appropriate documentation through Be with Us or independently if needed (e.g. photo ID, proof of address, income).
- Confirm eligibility, including Right to Rent and housing register validation
- Cross-check information using internal records and available data sources

4.3 Additional checks may be undertaken where concerns are identified, including verification of household composition and tenancy history.

Stage 2: Detection (During Tenancy)

4.4 Tenancy fraud may be identified through:

- Routine tenancy visits and tenancy audits
- Intelligence-led activity

- Reports from customers, staff or external agencies
- Data anomalies or inconsistencies

4.5 Staff should be alert to indicators such as:

- Lack of access to the property
- Low engagement from the tenant
- Presence of undeclared occupants
- Reports of subletting or misuse
- Unusual tenancy or rent account activity

4.6 Calico Homes will ensure that customers and members of the public can easily report suspected tenancy fraud through accessible reporting channels.

Stage 3: Case Referral and Logging

4.7 All suspected tenancy fraud concerns must be recorded on **Active H** at the earliest opportunity. This will be opened as a Tenancy Management case under the category of Tenancy Fraud.

4.8 An initial review will be undertaken, including:

- Basic system checks
- Review of tenancy details
- Consideration of any previous concerns

4.9 The case must be discussed with the Tenancy Fraud Champion (and or line manager where appropriate).

4.10 The Tenancy Fraud Champion will advise:

- Whether the concern meets the threshold for formal investigation
- Whether additional checks should be undertaken
- Whether checks via NAFN are appropriate
- The most appropriate next steps

4.11 Where additional intelligence is required, the Tenancy Fraud Champion will determine whether it is appropriate to access NAFN (National Anti-Fraud Network) data services.

4.12 Access to NAFN will be:

- Restricted and controlled
- Undertaken only where necessary and proportionate

- Used to support lawful investigation and evidence gathering.
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Stage 4: Investigation

4.14 Investigations will be undertaken in a timely, proportionate and evidence-based manner.

4.15 Activities may include:

Evidence Gathering

- Reviewing tenancy records and application documentation
- Analysing rent accounts, repair history and tenancy activity
- Conducting announced or unannounced visits
- Reviewing relevant publicly available information

Intelligence and Data Checks

- Using internal systems and available data sources
- Targeted use of NAFN data services, where authorised by the Tenancy Fraud Champion

4.16 NAFN may be used to:

- Verify identity and residency
- Identify undisclosed tenancies or property ownership
- Support cross-agency intelligence and case development

4.17 All use of NAFN must be:

- Clearly justified
- Recorded within the case on Active H
- Compliant with data protection legislation

Interviews and Enquiries

- Engaging with tenants
- Speaking with neighbours or relevant third parties where appropriate

4.18 All investigation activity must be recorded on **Active H**.

Stage 5: Decision Making

4.19 Following investigation, outcomes may include:

- No further action
- Ongoing monitoring

- Tenancy management action
- Legal action
- Referral for criminal investigation

4.20 Decisions must be:

- Evidence-based
- Clearly documented
- Approved at the appropriate level

4.21 Cases that may be considered material or high-risk must be escalated to management and, where appropriate, to the Senior Leadership Team (SLT).

Stage 6: Enforcement Action

4.22 Where tenancy fraud is identified, Calico Homes will take appropriate enforcement action.

4.23 In some cases, tenants may choose to surrender the tenancy following investigation and presentation of evidence. This can enable the property to be recovered without the need for legal proceedings.

4.24 Enforcement options include:

Legal Action

- Possession proceedings
- Injunctions where appropriate

Financial Recovery

- Recovery of unlawful profit
- Court costs and associated fees

Criminal Action

- Referral to Police or relevant authority
- Use of available legislation, including proceeds of crime provisions

Stage 7: Rehousing and Safeguarding

4.25 Where individuals occupying a property unlawfully are identified, consideration will be given to:

- Providing housing advice
- Referral to local authority homelessness services
- Safeguarding responsibilities

4.26 In exceptional circumstances, further support or rehousing options may be considered.

Stage 8: Case Closure and Learning

4.27 At case closure, outcomes must be recorded on **Active H**, including:

- Property recovery
- Financial recovery
- Enforcement action taken

4.28 Case information will be used to:

- Support performance reporting
- Identify trends and risks
- Inform continuous improvement

4.29 Learning will be used to strengthen prevention, detection and partnership working.

5. Monitoring and Reporting

5.1 Tenancy fraud activity will be monitored through internal systems and performance reporting.

5.2 Monitoring will include:

- Number of cases reported and investigated
- Properties recovered
- Financial recovery achieved
- Enforcement outcomes

5.3 Information will be used to support:

- Assurance and governance
 - Continuous improvement
 - Regulatory reporting requirements
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6. Review

6.1 This procedure will be reviewed every two years or earlier in response to:

- Legislative or regulatory changes
- Operational learning

- Identified improvements in practice