Tenancy Fraud Policy

Policy Owner:	Rachel Bennett	**Strategic Partner Sponsor:**	Steve Nichol
Exec Owner:	Chief Customer Officer		
Approval Body: Magenta Board, Leadership Board (full Board or member)	ELT, Approved by Chief Customer Officer	**Date Approved by Approval Body:**	19th August 2026
Date endorsed by EIA Review Group:	24th July 2026	**Date Endorsed by the Policy Forum:**	29th July 2026
Review Frequency:	Every 3 years	**Next Review Date:**	August 2029
Policy Version:	V1.0	**Published (Intranet/Website):**	August 2026

1.0 What is this Policy for?

1.1 This policy sets out Magenta Living's approach to preventing, identifying, investigating and responding to tenancy fraud. It supports the fair allocation and efficient use of our homes, protects customers and communities, and safeguards Magenta Living's housing assets and reputation. For the operational process, prioritisation approach and examples of indicators, **see Appendix C (Tenancy Fraud Guidance).**

2.0 Details of the Policy

This policy applies to all Magenta Living tenants and household members, applicants for housing, leaseholders where relevant, and any third parties who may seek to benefit from tenancy fraud. It also applies to Magenta Living colleagues, contractors and partners who may identify or report tenancy fraud concerns.

2.1 Definitions and Examples of Tenancy Fraud

Tenancy fraud occurs when a Magenta Living home is occupied by someone who is not legally entitled to live there, or where a tenancy (or a related housing entitlement) is obtained or used dishonestly.

- **Unlawful subletting / parting with possession** (whole property or part of the property without permission).
- **Non-occupation** (property is not the tenant's only or principal home).
- **Application fraud** (obtaining a tenancy by providing false information or withholding information that would affect eligibility or priority).
- **Unlawful succession or assignment** (false claim to succeed to or be assigned a tenancy).
- **Mutual exchange fraud** (including financial incentives, misrepresentation of circumstances, or concealment of information).
- **Key selling** (receiving money or another benefit in return for handing over keys/occupation).
- **Right to Buy / Right to Acquire fraud** (false information used to obtain a discount or purchase entitlement).
- **Criminal exploitation and 'cuckooing'** (where the home is taken over by others, often linked to safeguarding risks).
- **Benefit-related fraud linked to occupancy** (e.g., misrepresenting household composition or address for benefit claims).

2.2 Policy Statement (zero tolerance and proportionate approach)

Magenta Living has a zero-tolerance approach to tenancy fraud. We will take reasonable and proportionate action to prevent and detect fraud, investigate concerns, and recover homes that are not being used lawfully. We will balance enforcement with support, particularly where vulnerability, safeguarding, or coercion may be a factor.

2.3 Roles and Responsibilities

- **Neighbourhood Management & Community Safety Team:** overall responsibility for preventing and investigating tenancy fraud; triage, case management, evidence gathering and enforcement decisions.
- **Neighbourhood Housing Officers:** routine prevention and detection activity (including inspections), accurate record keeping, and prompt escalation of concerns.
- **Allocations and Lettings colleagues:** robust pre-tenancy checks and verification to prevent application fraud.
- **Income and Sustainment colleagues:** identify indicators linked to non-occupation/subletting (e.g., unusual payment patterns) and support lawful tenancy sustainment where appropriate.
- **Business Assurance / Audit:** support fraud risk management, controls, data assurance and learning.
- **All colleagues:** remain vigilant and report suspected tenancy fraud via agreed routes.

2.4 Prevention and Detection

2.4.1 Pre-Tenancy Checks

Before granting a tenancy, Magenta Living will complete proportionate verification to confirm the applicant's identity and eligibility and reduce the risk of fraud. Checks may include (where relevant):

- Verification of photographic identification (e.g., passport or driving licence).
- Confirmation of current address and residency status.
- Cross-checking application information against allocation and housing register records.
- Verification that required Right to Rent checks have been completed where applicable.
- Validation of household composition and any priority/medical information (including evidence checks).

2.4.2 Tenancy Assurance Activity

Magenta Living uses routine and targeted activity to maintain tenancy integrity and keep tenancy data accurate. This may include:

- **Annual tenancy inspection programme** (risk-based), including identity verification and a review of household information to confirm occupancy and tenancy use (**see Appendix C**).
- Targeted visits where indicators suggest non-occupation, subletting or other irregularities.
- Place-based engagement activity (e.g., coordinated neighbourhood door-knocking) to increase assurance and visibility.
- Data quality checks to ensure contact details, household composition and vulnerabilities are up to date.
- **Annual tenancy fraud data validation** (including external data matching) to identify potentially deceased tenants and other higher-risk cases (**see Appendix C)**.

2.5 Reporting Suspected Tenancy Fraud

We encourage customers, colleagues and partners to report concerns about possible tenancy fraud as early as possible ("See it, report it"). This supports early intervention for fraud risks as well as wider tenancy concerns (for example anti-social behaviour, hate-related incidents, domestic abuse and safeguarding). For more detail on the "See It, Report It" approach, **see Appendix C.**

- **Tenancy Concern Hotline:** 0151 606 3333.
- Magenta Living contact centre / published reporting routes (including anonymous reports where available).
- Directly to a Neighbourhood Housing Officer or the Neighbourhood Management & Community Safety Team.
- Confidential reporting / whistleblowing arrangements for colleagues and contractors.

Where a report is made by a customer or third party and contact details are provided, Magenta Living will aim to acknowledge receipt within 5 working days. We will triage reports based on risk, available evidence and potential safeguarding concerns, and we will keep information-sharing proportionate and lawful.

2.6 Investigation Approach

Investigations will be conducted fairly, consistently and in line with our legal obligations. The approach will be evidence-led and may include (where relevant):

- Desktop review of tenancy records and application/verification information.
- Contact attempts and requests for evidence of occupancy (e.g., identity checks, proof of residence).
- Tenancy inspections / unannounced visits where appropriate and lawful.
- Review of relevant intelligence (including information from partners, where lawful to obtain and share).
- Safeguarding assessment where there are indicators of exploitation, coercion or vulnerability.
- Case recording and evidence management to support civil and/or criminal action where required.
- Consideration of communication and accessibility needs will be undertaken

2.7 Outcomes and Enforcement

Where tenancy fraud is proven (or where evidence supports enforcement action), Magenta Living will take proportionate steps which may include:

- Tenancy enforcement action, including seeking possession where appropriate.
- Action to end an unlawful subtenancy and recover the home for re-let in line with our lettings policy.
- Referral to partner agencies (e.g., local authority fraud teams, police) for consideration of criminal investigation/prosecution where appropriate.
- Application for recovery of unlawful profit and/or costs where legal routes allow.
- Internal control improvements and learning actions to prevent recurrence.

2.8 Data Protection, Confidentiality and Information Sharing

Magenta Living will handle personal data lawfully and securely when preventing and investigating tenancy fraud. Information will be shared internally and with external partners only where there is a lawful basis and it is

necessary and proportionate to do so (for example, for the prevention and detection of crime, safeguarding, or to pursue legal remedies). We will keep records in accordance with our retention schedules.

2.9 Safeguarding and Vulnerability

We recognise that some tenancy fraud indicators may be linked to vulnerability, exploitation, domestic abuse, modern slavery, or 'cuckooing'. Where concerns suggest a customer may be at risk, we will prioritise safeguarding actions and work with appropriate agencies. We will also consider supportive interventions alongside enforcement—for example, early support through our **Sustainability Service** and proportionate enforcement by the **Community Safety Team** where risks escalate (**see Appendix C**).

2.10 Equality, Diversity and Reasonable Adjustments

We will implement this policy fairly and without unlawful discrimination. We will consider accessibility needs and provide reasonable adjustments in our communication and processes where required.

3.0 Who was consulted and how was it done?

This policy has been developed using Magenta Living's existing internal policies and procedures that have historically informed and shaped our approach to preventing and responding to tenancy fraud. This includes, but is not limited to, our Fraud Policy, Tenancy Policy, Allocations and Lettings processes, safeguarding arrangements, and information governance framework.

In developing this policy, we have also had regard to relevant legislation and the guidance and expectations set out by the Regulator of Social Housing, particularly in relation to tenancy management, fairness, transparency and the effective use of social housing stock.

3.2 The proposed policy was consulted on through Magenta Voice, this took place between the 7th May – 21st May 2026. Their views have been fully considered and incorporated where applicable / appropriate within the body of the policy.

4.0 Equality Impact Assessment (EIA)

An EIA is completed when a new policy is being written, or an existing policy is being reviewed. This helps to make sure you consider the needs of different groups of colleagues or customers and can identify if the policy could cause

any potential or actual negative impact to them. (Link to EIA document to be added)

4.1 We believe all people should be treated with dignity and respect regardless of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including nationality, ethnic or national origins), religion, belief or non-belief, sex or sexuality, or by association with someone with any of these characteristics or perception of having any of these characteristics.

4.2 The EIA was undertaken on 24th July 2026. It was reviewed by the Equality Impact Assessment Review Group on 24th July 2026 and the final agreed rating was green. (See the full EIA document for further details).

NB A policy does not HAVE to be green to be approved

5.0 How we make sure this policy is effective

We will monitor tenancy fraud reports, investigations, outcomes and learning to support continuous improvement and assurance. Monitoring will include outputs from tenancy assurance activity (see section **6.2**) and outcomes from the annual tenancy fraud data validation exercise (see **Appendix C**). This policy will be reviewed at least every three years, or sooner if there are changes to legislation, regulation, or organisational structure.

5.2 Where this policy is not followed by Magenta Living colleagues, this will be addressed in a fair and proportionate way. Our focus will be on understanding the reasons for non-adherence and taking appropriate action, which may include clarification of expectations, additional support or training. Where non-adherence is serious, repeated or deliberate, this will be managed in line with Magenta Living's disciplinary procedures. Learning from such cases will be used to strengthen controls, guidance and practice.

6.0 Colleague training

6.1 For this policy -Magenta Living will ensure relevant colleagues receive training and guidance to recognise indicators of tenancy fraud, understand reporting routes, and apply this policy consistently. Awareness messages for customers and partners will be used to encourage early reporting.

6.2 Cyclical training is available to all colleagues annually and forms part of our mandatory training content.

6.3 Completion will be monitored by HR with a monthly report sent to people managers showing who has completed the training and who is outstanding.

6.4 Annual training is required for colleagues who are part of the following job families:

- Neighbourhood Housing Officers
- Neighbourhood Management & Community Safety Team
- Allocations and Lettings colleagues
- Income and Sustainment colleagues
- Customer Contact / Contact Centre colleagues
- Relevant managers overseeing these services

Because they have direct customer contact, are involved in tenancy decisions, assurance or investigations and are most likely to identify early indicators of tenancy fraud

7.0 Documents related to the policy

- Fraud Policy
- Tenancy Policy
- Allocations & Lettings Policy (and associated procedures)
- Confidential Reporting / Whistleblowing Policy
- Safeguarding Policies and Procedures
- Data Protection Policy and Information Governance Framework

8.0 Version control / Amendment log

Date of change:	**Revised Version Number:**	**Change made:**	**Reason for change:**
19th August 2026	V1.0	New Policy	Compliance with consumer standards

Appendix A: Relevant legislation and regulation

- Prevention of Social Housing Fraud Act 2013
- Fraud Act 2006
- Housing Act 1985 and Housing Act 1988 (as amended)
- Data Protection Act 2018 and UK GDPR
- Regulator of Social Housing (RSH) Consumer Standards (including the Tenancy Standard)

Appendix B: Related Magenta Living policies and documents

- Fraud Policy
- Tenancy Policy
- Allocations & Lettings Policy (and associated procedures, including verification and Right to Rent checks where applicable)
- Confidential reporting / whistleblowing policy
- Safeguarding policies and procedures
- Data protection policy and information governance framework

Appendix C: Tenancy Fraud – Magenta Living Guidance (summary)

C1. Purpose

The purpose of this guidance is to set out Magenta Living's approach to preventing, identifying, investigating and responding to tenancy fraud. It explains the key responsibilities, the process to be followed when fraud is suspected or reported, and how investigations will be prioritised and evidenced, to ensure a consistent and proportionate response. This appendix should be read alongside the main policy **(see sections 4, 7, 8 and 9**).

C2. Responsibility

The Allocations & Neighbourhood Management and Community Safety Teams are responsible for leading on tenancy fraud prevention, triage, investigation activity and enforcement decision-making, with support from wider teams as set out in **section 5**.

C3. Process and examples of tenancy fraud

Magenta Living will take all reasonable steps to prevent and tackle tenancy fraud, including staff training and thorough, evidence-led investigations where fraud is suspected or alleged (**see sections 6 to 9**). Examples of fraud include:

- Unlawful subletting.
- Application fraud (obtaining a tenancy by providing false information or withholding information needed to assess an application fairly).
- Unlawful succession or assignment.

- Financial incentives around a mutual exchange.
- Selling of keys / key selling.
- Not using a property as the only or principal home (non-occupation).
- Right to Buy / Right to Acquire fraud.
- Fraudulently claiming benefits linked to occupancy.

Where a report is made by a customer or third party and contact details are provided, Magenta Living will aim to acknowledge the report within **5 working days** (**see section 7**). Where tenancy fraud is proven, Magenta Living will take appropriate tenancy enforcement action and may inform other agencies as required (**see section 9**).

C4. Pre-tenancy assessment (fraud prevention)

Magenta Living's pre-tenancy assessment process is designed to ensure homes are allocated fairly, sustainably and in line with statutory and regulatory requirements. A key objective is to prevent and detect tenancy fraud before a tenancy is granted, protecting homes for those who genuinely need them and safeguarding social housing assets (**see section 6.1**).

- Verification of photo identification (e.g., passport or driving licence).
- Confirmation of current address and residency status.
- Cross-checking applicant details against housing register and allocation records.
- Validation that the application aligns with the local authority's nomination and priority criteria.
- Right to Rent checks completed where applicable.

C5. "See It, Report It"

"See It, Report It" is the message we use to encourage customers, colleagues and partners to report concerns early—whether that is anti-social behaviour, hate-related incidents, domestic abuse, safeguarding issues, potential fraud, or anything that does not feel right in our neighbourhoods. The approach aims to reduce barriers to reporting, reassure people that concerns will be taken seriously, and help Magenta Living intervene sooner to keep customers and communities safe (**see section 7**). Reports can be made through the Tenancy Concern Hotline on **0151 606 3333**.

C6. Annual tenancy inspection programme

Magenta Living's annual tenancy inspection programme plays an important role in maintaining tenancy integrity and protecting our homes for those who genuinely need them. As part of each inspection, colleagues carry out identification verification and review household information to confirm who is living in the property and that the tenancy is being used as intended. These checks help identify early indicators of tenancy fraud, such as undeclared occupants, subletting or non-occupation (**see section 6.2).**

C7. Vulnerable customers

We take a balanced and person-centred approach to supporting vulnerable customers while also taking firm action to keep our homes and neighbourhoods safe. Through our Sustainability Service, we provide early practical support to help customers maintain their tenancy, build independence, and address issues such as financial hardship, health challenges or low wellbeing. Where risks escalate, the Community Safety Team will use proportionate enforcement to tackle serious concerns, including criminal exploitation and cuckooing (**see section 11**).

C8. Annual tenancy fraud data validation

On an annual basis, Magenta Living will provide tenancy data to Experian to carry out a tenancy fraud validation exercise. This will check data across national databases and categorise tenancies to support prioritisation (**see section 6.2 and section 14**).

- Potentially deceased
- Very high risk
- High risk
- Medium risk
- Low risk
-

The Neighbourhood Housing Team will complete a desktop review of the validation results and follow up with tenancy inspections to verify household data and update systems where appropriate. Cases flagged as **potentially deceased** and **very high risk** will be prioritised for action.