Accent

Tenancy Fraud Policy

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Tenancy Fraud Policy

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1.0	Director of Housing Services	22/06/2026	22/06/2029	New policy	Assistant Director of Housing Services

Purpose: This policy sets out Accent's approach to preventing, detecting and tackling tenancy fraud. It exists to protect valuable public assets, ensure homes are allocated appropriately, and maximise the availability of social housing for those in need. It also ensures compliance with legal and regulatory requirements and promotes effective use of homes.

Our approach to tackling tenancy fraud is guided by Accent's values of being Caring, Inclusive, Smart and Driven. We (Accent) are committed to protecting valuable social housing resources while ensuring all customers are treated fairly, respectfully and in accordance with their individual circumstances

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1. Introduction

Social housing is a limited and valuable resource that provides stability and security to those who require it. We believe our homes should be let and occupied by those with a genuine need for social housing and not misused by others for personal gain.

Those who commit tenancy fraud deprive people who are genuinely in need from accessing social housing. This is unacceptable and therefore we have a responsibility to make the best use of public resources by ensuring that Accent homes are properly managed, and that tenancy fraud is prevented or appropriately dealt with when detected.

Tenancy fraud undermines this by preventing access to homes for eligible applicants and, in some cases, enabling unlawful financial gain.

We take a zero-tolerance approach to tenancy fraud and are committed to tackling it through prevention, detection, investigation and enforcement. We will approach all allegations objectively and fairly, ensuring individuals are treated with dignity and respect throughout any enquiries or investigations.

We recognise that investigations into suspected tenancy fraud can be sensitive. We will ensure that all concerns are considered objectively and that customers are treated fairly, respectfully and in accordance with our values throughout the process. Where concerns are substantiated, we will take appropriate action to protect valuable housing resources and ensure homes remain available for those who need them most

2. Scope

This policy aims to ensure that our colleagues and customers have a clear understanding of how Accent manages tenancy fraud.

This policy applies to:

- Applicants for housing
- Tenants and joint tenants
- Shared owners and leaseholders (where relevant)
- Household members and occupiers
- Employees, contractors and partners

It applies across the full tenancy lifecycle, from application through to tenancy end.

3. Definitions

For the purpose of this policy, tenancy fraud is defined as any act where a person knowingly provides false information, withholds information, or misuses a tenancy in breach of their agreement, including to gain or maintain access to social housing. Examples include (but are not limited to):

- Obtaining housing through false or misleading information
- Non-occupation as a principal home
- Unlawful subletting (including short-term lets such as Airbnb)
- Unauthorised assignment or exchange
- False succession claims or failure to report a tenant’s death
- Key selling
- Right to Buy or Right to Acquire fraud
- False applications for joint tenancy or shared ownership

Tenancy Fraud can present itself in various forms and can occur at any stage during the tenancy life cycle – from obtaining a tenancy by deception, to failing to notify the landlord when the tenant moves out or passes away. In some instances, unlawful subletting can generate lucrative profits for individuals or organised groups.

This does not include permitted lodgers or subletting arrangements where prior written consent has been given from Accent, as set out in the tenancy agreement.

4. References

Accent Policies and Procedures can be found in the Corporate Library.

- Housing Act 1985
- Housing Act 1988
- Housing Act 1996
- Protection from Eviction Act 1977
- Landlord and Tenant Act 1985
- The prevention of Social Housing Fraud Act 2013
- The Fraud Act 2006
- The Human Rights Act 1998
- The Data Protection Act 2018
- The Equality Act 2010
- UK General Data Protection Regulation
- Accent Allocation & Lettings Policy
- Accent Tenancy Policy
- Accent Starter Tenancy Procedure

5. Policy Review

This policy will be reviewed every 3 years, or sooner if required by legislative, regulatory, or organisational changes. Amendments will be communicated to all staff and relevant stakeholders. E-learning and associated training will be updated in line with any changes to this policy.

The implementation of this policy will be monitored through quarterly reports to the Audit and Risk Committee.

We will use information from tenancy fraud investigations, audits, complaints, regulatory developments and sector learning to continuously improve our approach to fraud prevention and tenancy management

6. Exceptions

There may be certain circumstances under which the terms of this policy may be reconsidered. Colleagues should be mindful of customer vulnerabilities and their specific needs. Extenuating circumstances will be assessed on a case-by-case basis and exceptions may be applied that require empathy and flexibility, to ensure that customers are treated fairly, compassionately and with respect.

7. What is Tenancy Fraud

Tenancy Fraud includes, but is not limited to:

Subletting a property to someone who is not entitled to live there whether for profit or not, without the knowledge or permission of Accent. This includes allowing the use of the home for short term lets including via third parties (e.g.Airbnb).

Abandonment of the property where the customer is living elsewhere and has allowed someone else to live in their home.

Unlawful tenancy succession - false applications that result in a succession of a tenancy following the death of a tenant. Tenancy succession is the process where on the death of a tenant, their tenancy can be passed on to a family member. There are specific rules and eligibility criteria that must be met for a tenancy to be succeeded.

Obtaining an Accent home by deception by providing false or misleading information to secure an offer of accommodation. This includes claiming to be someone else, forged documents such as passports, false declaration of income or assets, failing to disclose whether you are renting or owning another property, failing to declare that you are related to an Accent colleague and/or failing to be honest in declaring the how many people live in your household.

Unauthorised assignment of the tenancy such as through a mutual exchange or transfer of the tenancy without written permission from Accent. This could include when tenants swap their homes without permission from Accent or by providing false information or accepting payment for an exchange.

'Key selling' - where a tenant or someone acting on their behalf accepts a payment to give a third party the keys to their home. This includes applying pressure to Accent colleagues and offering payment for keys to a home.

Applying for the Right to Buy, Right to Acquire or to buy shared ownership housing with false and/or misleading information.

8. Prevention of Tenancy Fraud

We will work to ensure customers understand their tenancy rights and responsibilities and provide clear information to help prevent tenancy fraud from occurring.

We aim to ensure that each property is let to and occupied by the person(s) to whom it was allocated. We will take proactive steps to prevent tenancy fraud through robust verification, monitoring and tenancy management processes throughout the entirety of the tenancy.

We will undertake appropriate checks at the point of application and sign-up to verify identity, eligibility and household composition, and to ensure compliance with relevant legal requirements.

Following tenancy commencement, we will take proportionate steps to confirm and monitor occupancy, including tenancy visits, audits and the use of data and intelligence where appropriate.

Customers are required to provide accurate information, occupy the property as their only or principal home, and comply with their tenancy agreement. They must inform us of any relevant changes to their circumstances and cooperate with reasonable requests for access, information and verification.
We will take appropriate action where tenancy conditions are not met or where there are concerns regarding occupancy or potential tenancy fraud.

All information will be stored securely and made accessible to colleagues responsible for investigating tenancy fraud.

Where concerns arise, we will:

- Carry out appropriate checks, this may include speaking with neighbours and reviewing available data
- Undertake further investigation where necessary, including checks via National Anti-Fraud Network (NAFN) or other data sources

We will also:

- Publicise our approach to tenancy fraud to deter misuse and raise awareness
- Promote reporting of suspected fraud
- Work with local authorities and partner organisations, including participation in tenancy fraud forums
- Share data lawfully to prevent fraud and reduce crime

We reserve the right to refuse or delay housing applications where there are grounds to suspect fraud and may refuse applicants with previous tenancy fraud convictions where appropriate.

Our tenancy agreements state that the tenants must use the property as their only or main home, must not part with it or sub-let it, nor transfer the tenancy without our permission. We provide guidance and information to tenants about their rights and responsibilities in relation to these and other clauses.

We have policies and procedures on a range of tenancy matters that can give rise to tenancy fraud, including lettings, succession, assignment, mutual exchange, abandonment and the Right to Acquire and Right to Buy. Customers can locate these on our website.

9. Identification and reporting of Tenancy Fraud

We will encourage colleagues, stakeholders, tenants and members of the public to report suspected cases of tenancy fraud to us.

Colleagues responsible for identifying and investigating tenancy fraud will receive appropriate training, guidance and support to ensure it is identified, actioned and that investigations are conducted consistently, professionally and fairly

We aim to make it easy for tenants and members of the public to report suspicions of tenancy fraud. Reports can be made:

- via our website (www.accentgroup.org/contact-us/)
- By email (customerservices@accentgroup.org)
- By telephone (0345 678 0555)
- In writing *Accent Housing, 3rd Floor, Scorex House, 1 Bolton Road, Bradford BD1 4AS).
- In person

All reports will be acknowledged promptly, investigated proportionately and handled confidentially.

In cases of suspected benefit fraud, we will encourage witnesses to report this directly to the Department for Work & Pensions (DWP) or Local Authority Housing Benefit Department, or any other relevant Authority. We will also report the allegation to the relevant authority.

10. Investigation, Enforcement and Action

All allegations of tenancy fraud will be investigated in line with relevant legislation, including the Prevention of Social Housing Fraud Act 2013 and the Fraud Act 2006.

If we have concerns that an existing tenant may be committing tenancy fraud, we will carry out appropriate checks. Where initial enquiries indicate further concerns, we may undertake a more detailed investigation. This may include interviews, property inspections, data checks with relevant organisations, and a review of tenancy and application records. We may also request supporting evidence, such as proof of identity, residence or other relevant documentation, to assist with our investigation.

Where tenancy fraud is identified, we will take appropriate and proportionate action. This may include one or more of the following:

- Seek to recover the property either through the tenant surrendering the tenancy or a Court Possession Order.
- In accordance with the Prevention of Social Housing Fraud Act 2013 and/or Fraud Act 2006, where we find evidence of a criminal offence, we will work with local authority fraud teams to bring a criminal prosecution alongside civil proceedings. In cases of unlawful subletting, we may also seek an Unlawful Profit Order.

We recognise that there may be unauthorised occupants who are unaware that tenancy fraud has been committed. We will give appropriate advice and signposting information in accordance with the Homelessness Reduction Act 2018

We recognise that vulnerabilities, support needs, health conditions, communication needs and safeguarding concerns may be relevant when investigating potential tenancy fraud and will take these factors into account when determining an appropriate response

11. Partnership Working and Information Sharing

We will work in partnership with relevant organisations to prevent, detect and investigate tenancy fraud, and to support effective enforcement action.

This includes working with:

- Local authorities
- Police
- Other registered providers
- Government agencies

We also participate in tenancy fraud forums and other multi-agency initiatives where they are in operation, to share intelligence, best practice and coordinate responses to fraud and wider criminal activity.

We will share information with partner organisations where it is lawful and appropriate to do so, including for the purposes of:

- Preventing and detecting tenancy fraud
- Investigating suspected fraud
- Reducing crime and protecting public resources

All information sharing will be carried out in accordance with data protection legislation and organisational policies.

12. Equality, Diversion & Inclusion

We are committed to ensuring our approach to tenancy fraud is fair, equitable and free from discrimination. We will make reasonable adjustments where required and ensure investigations and communications are accessible to customers with differing needs.