

**Fraud Hotline
Tenant FAQ – August 2013**



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Fraud

1. Why should I care about fraud and make a report?

Fraud affects everyone at Toronto Community Housing. Funds lost through fraudulent activity prevent Toronto Community Housing from investing in much-needed capital repairs. Delaying repairs to vacant units also prevent clients on the wait list from moving into an apartment sooner. Vandalism diverts repair funding to address the damage rather than the repair priorities identified by staff and other tenants.

Wasteful activities may cause you and your community to wait longer for needed repairs.

2. Why did it take Toronto Community Housing so long to do this?

Implementing a Fraud and Waste line at Toronto Community Housing has been in the works for quite some time. Tenants have always had the opportunity to report their concerns using the Client Care number. The challenge was implementing a system that would work for both tenants and staff. The challenge was implementing a system that would work for both tenants and staff. Starting January 1, 2012 tenants and staff were able to report fraud and waste concerns anonymously via the “Do What’s Right” Hotline at 1-877-993-6744.

Types of Complaints

3. What type of *tenant* concerns should other tenants report?

Please report if you suspect, or have knowledge of, a tenant committing any of the following items:

Falsifying accounts, records, or other documents or information, for example:

- not reporting or falsifying income/assets;
- not reporting additional household members;
- not reporting household members who no longer reside in the unit;
- falsifying status in Canada;
- falsifying waiting list priority; or

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- subletting a unit;
- Forging cheques, drafts, promissory notes, securities records and other documents;
- Obtaining company funds or compensation through dishonesty;
- Conspiracy to commit fraud with others; or
- Extortion (e.g. threatening action, unless some benefit is received).

4. Are there things I should not report to the fraud hotline?

Please do **NOT** use the fraud hotline to report the following:

- Noise
- Drug activity
- Repair requests
- Threatening behaviour
- By-law infractions

Please report these concerns to the Client Care Centre at **416-981-5500**.

5. I am a tenant, what type of *employee* concerns can I report?

Please report if you suspect, or have knowledge of, a Toronto Community Housing employee committing any of the following items:

- Unauthorized use or misuse of Toronto Community Housing property (including equipment, materials, or records and proprietary or confidential information) and time;
- Exercising authority or influence over a matter where a conflict of interest exists, including violations of Toronto Community Housing's Conflict of Interest Policy;
- Extortion (e.g. threatening action unless some benefit is received);
- Misappropriation and/or theft of funds, securities, supplies, fixtures, equipment, software or other assets;
- Forgery, falsification or alteration of cheques, drafts, promissory notes, securities records, or other documents;
- Obtaining company funds or compensation through dishonesty;
- Profiteering as a result of insider knowledge of company activities;
- Acts of bribery - which can include acceptance of secret commissions, seeking or accepting anything of material or personal value from vendors, consultants, or contractors doing

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- business with Toronto Community Housing, or from tenants or applicants for housing with Toronto Community Housing;
- Offering, giving or soliciting, or accepting of an inducement or reward that may improperly influence the action of a person or entity;
 - Intentionally destroying or defacing Toronto Community Housing property or assets;
 - Disclosing confidential information to outside parties; or
 - Any other improper dealings with tenants, vendors or agencies.

6. What if I witness something not listed in questions 3 or 4?

The lists provided in questions 3 or 4 are not all-inclusive. If you are not sure whether or not to report something, take the cautious approach and report it anyway. If your concern is not fraud or waste related you may be referred to the Client Care Centre at 416-981-5500.

You should make an anonymous report by calling the “Do What’s Right” hotline at:

1-877-993-6744

or online at:

www.securaglobe.com/torontocommunityhousing.

You can also write to:

Investigations Unit
c/o Toronto Community Housing
931 Yonge Street, 7th Floor
Toronto, ON M4W 2H2

A template to help you make a report in writing is available at:

www.torontohousing.ca

7. What about criminal concerns?

In an emergency situation you should call 9-1-1.

Non-emergency criminal activity should be reported to the Toronto Police Crime Stoppers at **416-222-TIPS (8477)** or the Community Safety Unit at **416-921-2323**.

8. What about Human Rights concerns?

Human Rights concerns should follow the procedures outlined in the Human Rights, Harassment and Fair Access Policy. You can access the policy [here](#).

The complaint procedure for dealing with Human Rights concerns is set out [here](#).

Making a Report

9. If I made a report, what can I expect?

All reports and the reviews / investigations are different.

If you report anonymously, you receive a password. This password will help you remain anonymous in case the service provider contacts you during the investigation process for more information or to clarify details you provided. Toronto Community Housing employees conducting an investigation cannot contact you directly. If staff require more information they contact the service provider, who then follow up with the person who made the report, this helps a caller remain anonymous.

Unless you have additional information to add to your report, please do not call or re-submit an additional report. The Investigations Unit prioritizes investigations and then followed up with some staff support. Toronto Community Housing and its staff are duty bound to keep as much information as possible confidential during an investigation – even to the person who made the report.

Staff will review all investigations. Unless contacted, we ask that you remain patient as reviews take time to complete.

10. I am afraid to make a report, what should I do?

Filing a report can cause stress – but so can worrying about information you have. If you suspect anything fraudulent or wasteful, it is best to file a report. There is whistleblower protection ([see below](#)) so you should not be afraid to make a report. Toronto Community Housing will protect all employees and tenants who share honest concerns.

Remember, you can make an anonymous report by calling the “Do What’s Right” hotline at 1-877-993-6744 or online at www.securaglobe.com/torontocommunityhousing

False Reports

11. What happens to tenants who make a false report?

The “Do What’s Right” reporting service used by Toronto Community Housing employs trained operators. The questions they ask help to differentiate honest concerns from frivolous complaints. The Investigations Unit will follow up on all documented and flagged concerns.

Frivolous complaints or concerns that are harassing or shown to have adverse affects on other tenants will be reviewed and processed under the policy on [Evictions for Cause](#). ***Severe situations may result in eviction or loss of tenancy.***

12. What happens to employees who (i) make false allegations or (ii) fail to report a matter?

Employees who are proven to knowingly make false allegations or who fail to report serious irregularities will be subject to discipline, up to and including dismissal.

Investigations

13. How does an investigation work?

All investigations will be conducted in the strictest of confidence in an objective and impartial manner.

Toronto Community Housing will investigate any suspected acts of fraud, corruption or other similar wrongdoing. An objective and impartial investigation will be conducted regardless of the tenancy or the position, title, and length of service of any employee who is, or becomes, the subject of an investigation.

Investigations may include the participation of management representatives from any business unit, Toronto Police Services, or any other resources deemed necessary.

The Investigations Unit within Internal Audit is responsible for coordinating investigations, reporting findings and making recommendations to senior management and staff on (i) a future course of action and/or (ii) the implementation of policies to prevent future occurrences.

An investigation generally follows the following process:

- a) The matter is reported online or by phone;
- b) The independent service provider (Securaline) documents the information from the report and shares it with the Investigations Unit;
- c) The Investigations Unit briefly reviews and prioritizes the report;
- d) The Investigations Unit will attempt to verify the report by finding more information;
- e) Based on the information that is found, the Investigations Unit either pursues the investigation or closes the investigation.

The Investigations Unit will generally close a case if:

- There is not enough information available to confirm the report; or
- It is determined that the matter is not a Toronto Community Housing matter.

Anonymity

14. Do I really remain anonymous?

When you report through the “Do What’s Right” reporting service, you will remain anonymous. You will receive a password, should investigators need to contact you during an investigation. Any contact information shared will remain with the independent service provider engaged by Toronto Community Housing. Toronto Community Housing staff are not permitted to contact you directly.

All participants in an investigation must keep the details and results of any investigation confidential. Particulars of the investigation with potential witnesses may be disclosed only if such disclosure would further the investigation, and only after consultation with legal services and labour relations (as applicable).

Throughout the investigation, senior Toronto Community Housing officials who have a legitimate need to know will be informed of pertinent investigative findings. To the extent possible by law, the identity of individuals involved in an investigation, including the identity of an individual alleging fraud and the identity of the individual alleged to have committed fraud, will be protected.

15. Are there situations where anonymity is not permitted?

There are some situations when reporting concerns about staff that cannot be anonymous. This applies to Special Constables within the Community Safety Unit.

16. Why can't concerns against Special Constables be anonymous?

Concerns against Special Constables cannot be anonymous because of the *Police Services Act*.

Like other peace officers, concerns against our Special Constables must be submitted in writing. The review will follow the provisions of the *Police Services Act* and the staff member who the claim is made against will be informed of the claim.

Whistleblower Protection

17. I filed a concern and now I am being threatened by a tenant or staff, what should I do?

The Fraud Prevention Directive provides clear whistleblower protection; at no time should you feel threatened by tenants or anybody else because you made a report. If you feel you are being threatened you should file a [Human Rights](#) complaint. Tenants who are found to be harassing other tenants because they filed a complaint will be reviewed and processed under the policy on [Evictions for Cause](#). **Severe situations may result in eviction or loss of tenancy.**

Gifts

18. Did you know Toronto Community Housing staff cannot accept gifts?

Simply put - Toronto Community Housing's Code of Conduct Policy states:

"No one may give or take anything that might be seen as a bribe from an employee, tenant, applicant, supplier or contractor. This means people who work for TCHC never accept:

- *any "tip" or gift of money;*
- *any gift other than a token or a memento; or*
- *any offer to make a donation to a charitable cause on their behalf"*

19. What is considered a “token” gift or memento?

Toronto Community Housing considers the following to be acceptable “token” gifts:

- greeting cards, thank-you notes or other written forms of thanks or recognition;
- home-made gifts or crafts - TCH encourages staff to showcase these gifts or crafts in their office where possible; and
- an occasional cup of coffee.

Tenants may wish to show staff their appreciation of the work performed. If you wish to do so, we ask that you consider what staff can occasionally accept from the list above.

More Questions

20. I have more questions, who can I contact?

Even if you are unsure or hesitant about filing a complaint we encourage you to call the Do What’s Right line at **1-877-993-6744** or online at www.securaglobe.com/torontocommunityhousing anyway, and inform the operator the reasons of your hesitation. Sometimes sharing partial, honest information may help an ongoing investigation or encourage a new investigation.