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Fraud

What is fraud?

Fraud is defined as a dishonest act that results in actual loss or risk of loss, deception, misappropriation of resources, or the manipulation of data to the advantage or disadvantage of a person or entity. Fraud includes any misuse or attempt to misuse; (i) one's position in the company and/or (ii) a company asset for personal gain or purposes unrelated to company business.

Why should I care about fraud and file a report?

Fraud affects everyone at Toronto Community Housing (TCHC). Funds lost through fraudulent activity reduce Toronto Community Housing's ability to invest in essential capital repairs. Delays in repairing vacant units also slow down the process of housing those on the waitlist.

Wasteful activities can result in longer wait times for necessary repairs and other community investments.

Fraud prevention policy

What is the purpose of the Fraud Prevention Policy?

The policy is part of TCHC's controls to help prevent and detect fraud. It outlines responsibilities for reporting suspected fraud and provides guidelines for conducting investigations.

Types of complaints

What type of *employee* concerns should be reported?

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

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- Unauthorized use or misuse of Toronto Community Housing property (including equipment, materials, or records and 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);
- Mishandling 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;
- Making an unreasonable profit 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 business with Toronto Community Housing, or from tenants or applicants for housing with Toronto Community Housing;
- Offering, giving or soliciting, or accepting a reward that may improperly influence the action of a person or entity;
- Intentionally destroying or vandalizing Toronto Community Housing property or assets;
- Disclosing confidential information to outside parties; or
- Any other improper dealings with tenants, vendors or agencies.

What type of *tenant* concerns should be reported?

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

- Tenants who have failed to report a change in household composition:
 - People living in the unit who are not on the lease.
 - Overhoused – falsely declaring additional occupants in a household to keep a larger unit
- Tenants subletting all or part of a subsidized unit
- Tenants intentionally failing to report income and/or assets
- Tenants who have misrepresented or altered their income documents

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- Tenants failing to report ownership of residential property
- Tenants failing to report that students are no longer attending post-secondary courses

Are there complaints I should not report to the fraud hotline?

In an emergency, always call **9-1-1**.

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

- Maintenance issues

Please report the above concerns to the Client Care Centre at help@torontohousing.ca or 416-981-5500.

- Emergency safety Incidents or security Incidents
- Criminal or illegal activity
- Anti-social behaviour issues
- Parking violations
- Trespassing
- Complaint About a CSU Constable

Please report the above concerns to the Community Safety Unit at 416-921-2323. Visit Toronto Community Housing [Services & Supports page](#) for additional contact information for other support services available in your community.

What if I know about other examples not in the above list?

The lists above are not all-inclusive. If you are not sure whether to report an incident, 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** or the Community Safety Unit at **416-921-2323**.

Who do I report criminal matters to?

In an emergency situation you should always dial **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**.

Who do I report Human Rights concerns to?

If you have a Human Rights concern, you should follow the procedures outlined in the [Human Rights, Harassment and Fair Access Policy](#).

Refer to the [Tenant Complaint Procedure](#) for information about submitting a tenant complaint related to Human Rights concerns.

Submitting a suspected fraud or waste report

How do I submit a report about fraud?

There are three ways to report cases of suspected fraud or waste.

- **Phone:** call the fraud hotline at **1-866-781-7956**. Calls are answered 24 hours/day, 7 days/week, 365 days/year by an independent call centre. There is also an option to leave a report through voicemail.
- **Online:** complete and submit your complaint via our secure online form at clearviewconnects.com.
- **Mail:** submit your complaint in writing and mail it to “ClearView Connects P.O. BOX 11017, TORONTO, Ontario M1E 1N0”.

What information should I include in my report?

Please answer the following questions with specific and detailed information to support any allegations:

- What are the allegations? Review the types of allegations listed on pages 2 and 3 and give as much information as you can about the suspected fraud incident that occurred.
- Where did the suspected fraud incident occur? Review [TCHC's Building Portfolio](#) to verify that the suspected fraud incident occurred at a location within TCHC's portfolio.

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- Who are the individuals involved? For example, names of tenants, staff, contractors or other individuals.
- How long has the suspected fraud incident been taking place?
- Who else may be aware of the incident? For example, police, media, staff or other individuals.

What can I expect after submitting a suspected fraud or fraud report?

Online

If you submit an anonymous report online through our independent service provider, ClearView, you will be assigned a unique, system-generated seven-digit Report ID and eight-digit strong password. The Report ID and password are unique to that specific report. This information cannot be retrieved in the future, so we encourage you to write down this Report ID and password. You also have the option to change the eight-digit system-generated password to a personal password after you have logged in at least one time.

There is a “Reporter Notification Feature” that gives you the option to confidentially provide an email address. Anytime TCHC updates the report to either ask questions, make comments, or to ask to clarify information you’ve provided, you will receive an email notification to the email address you have provided alerting you that your report has been updated. You are encouraged to log in to ClearView Connects to check the status of the report.

It is important to note that this “Reporter Notification Feature” is completely optional. If you choose to use this feature:

- TCHC will never see this email address as it is given confidentially to ClearView and is used for the distinct purpose of alerting you that your report has been updated. No contents of the report are included in the email notification.
- ClearView will permanently delete the email address once:
 - You have chosen to discontinue this feature (which you can do at any time)
 - You have not signed in for 90 days
 - The report has entered a ‘closed’ status

Phone

If you choose to submit a report using the fraud hotline, the Live Agent will provide you with a seven-digit system-generated Report ID and an eight-digit password. The Live Agent will also establish a unique security question with you, which requires a 'YYYYMM' 6-digit numerical format. Example, if the security question is '*What is your mother's birth year and month*' and the answer to this question is '*August 1960*,' then the answer to this question would be '*196008*.' The Live Agent establishes this security question and answer with you so that if you choose to check the status of your report by calling the hotline, you do not need to provide the eight-digit generated password to the Live Agent over the phone; you can simply provide the answer to the established security question.

Mail and voicemail

If you choose to submit your report by voicemail or submit a handwritten or typed letter, there is no option for further follow up as you are not assigned a Report ID.

Investigations

What steps are taken after I submit a suspected fraud or waste report?

The following steps are taken after a suspected fraud incident is reported either online, by phone, or in writing:

- ClearView, the independent service provider, documents the information from the report and shares it with TCHC's Investigations Unit;
- The Investigations Unit briefly reviews the report to determine the urgency or severity of the concern;
- The Investigations Unit will attempt to verify the report by searching additional information and then determine appropriate course of action;

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- Based on the information that is collected, the Investigations Unit will take one of the following actions (1) Pursue an investigation, or (2) close the case:

The Investigations Unit will generally close a case if:

- There is not enough information available to confirm the allegations
- It is determined that the reported incident is not a fraud related matter; or
- It is determined that the matter is not a Toronto Community Housing matter.

Anonymity

Can I remain anonymous when filing a suspected fraud incident?

ClearView provides a security platform which makes sure reports are submitted anonymously and confidentially. This platform also makes sure reports are stored securely.

When you file a report online, you have an option to remain anonymous or not. You can help protect your anonymity by making sure you do not include personal information in the report that would identify you.

If you use the online system, your report is automatically encrypted, and your IP address is not tracked.

If you call the hotline and speak to a ClearView agent, the call is not recorded, and caller ID is not used. The report is entered into the ClearView system using your exact words.

If you call the hotline and leave a voicemail report, your message is entered into the ClearView system by ClearView exactly as you left it, and then your voicemail message is deleted. Caller ID is not used.

If you send your report by mail, it will be transcribed into the system (if handwritten) or scanned and uploaded (if typewritten). Once entered into

the ClearView system, all original hard copies are destroyed. Only ClearView personnel can access the P.O. Box.

In all cases, the report data stays on ClearView's secure servers which are located in Canada.

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.

Why can't concerns against Special Constables be anonymous?

Concerns against Special Constables cannot be anonymous because of the *Community Safety and Policing Act*.

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

Whistleblower protection

What is the purpose of the Whistleblower Policy?

Toronto Community Housing Corporation (TCHC) is committed to promoting integrity, ethics, accountability, and transparency in what we do. TCHC recognizes it is in the best interests of the organization to maintain and enhance public confidence by encouraging the reporting of wrongdoing taking place within TCHC to designated individuals at the organization.

The purpose of this policy is to provide guidelines for reporting wrongdoing, and to provide reasonable protection from retaliation for individuals who report wrongdoing under this policy.

Gifts or Donations

Are Toronto Community Housing staff allowed to accept gifts?

Toronto Community Housing's Conflict of Interest Policy states:

"Gifts or donations

Employees may not solicit or accept any fees, advances, gifts, money, personal discounts, donations, personal benefits, meals, tickets, personal loans or the like from a resident or any other person or entity that has, or might have, business dealings with Toronto Community Housing where it could result in a conflict of interest.

The exceptions are gifts of a nominal value, such as a greeting card, hat, token, memento, fridge magnet, or occasional coffee, which do not influence or would not be perceived as influencing, the performance of the employee's duties. Other exceptions are accepting money where doing so is required as part of the employee's job (e.g. collecting rent or a fee established by Toronto Community Housing)."