

Pony Partnerships CIC



Cyber Security & Information Security Policy – 2025–2026

Name of Organisation: Pony Partnerships CIC

Venue/Address: All venues

Date of Review: 31 March 2026

Date of Next Review: 31 August 2026

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1. Introduction

Pony Partnerships CIC is committed to preventing fraud, payment diversion, and financial loss arising from false instructions, phishing, spoofed communications, or other forms of social engineering fraud.

This procedure sets out the minimum checks that must be completed before any new payee is added or any payment instruction is changed.

2. Scope

This procedure applies to:

- Directors;
- Employees;
- Associates;
- volunteers or contractors involved in payment processing, invoicing, banking, or financial administration.

It applies to:

- new supplier or payee set-up;
- changes to bank account details;
- amended payment instructions;
- requests to redirect payments;
- urgent or exceptional payment requests.

3. Core Rule

Details of any **new payee request** or **amended payment instruction** must always be checked verbally using trusted contact details already held on file or obtained independently from a published website.

Pony Partnerships CIC will **not** rely solely on the new instruction itself, email correspondence, attachment, letterhead, or message content.

4. Verification Requirements

Before setting up a new payee or amending bank details, the responsible person must:

- a) Review the request for any warning signs, including urgency, unusual wording, changed email

- address, or inconsistency with previous practice
- b) Verify the request by making verbal contact with the individual or organisation using:
 - a. a telephone number already held on file, or
 - b. a number taken from the organisation's independently published website
 - c) Confirm:
 - a. payee identity
 - b. account name
 - c. bank sort code
 - d. bank account number
 - e. reason for the change
 - d) Create a written record of:
 - a. who completed the check
 - b. date and time of the call
 - c. number used
 - d. name of person spoken to
 - e. outcome of the verification
 - e) Obtain approval in line with Pony Partnerships CIC's delegated authority arrangements before payment is made

5. Prohibited Practice

The following must not happen:

- bank detail changes being actioned solely on the basis of an email or message;
- use of telephone numbers supplied only within the change request itself, unless independently verified;
- bypassing verification because a request appears urgent;
- releasing banking credentials, passwords, or security codes by email or phone;
- one person both changing the bank details and approving the resulting payment where separation is possible.

6. Warning Signs of Social Engineering Fraud

Examples include:

- requests marked urgent or confidential;
- a message claiming senior authority and pressuring immediate action;
- minor changes to an email address or domain name;
- poor grammar or unusual tone;
- requests to bypass normal checks;
- changes to longstanding supplier details without clear explanation;
- payment requests received while a contact is reportedly unavailable.

Where any concern exists, the matter must be escalated to the Director before any action is taken.

7. Training and Acceptance

All relevant directors, staff, and workers involved in financial administration must:

- read this procedure;
- confirm that they understand and will comply with it;
- complete fraud and social engineering awareness training as required.

A record of acceptance and training completion must be kept.

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8. Recording

Pony Partnerships CIC will retain an auditable record of:

- payee verification checks;
- approvals;
- staff acceptance of this procedure;
- training completed under this procedure.

Records must be stored securely and in accordance with the Data Protection & Privacy Policy.

9. Breaches

Any departure from this procedure, attempted fraud, or suspected fraudulent instruction must be reported immediately to the Director.

Breaches may be treated as a disciplinary matter and may also require insurer notification, bank notification, police reporting, or data breach action depending on the circumstances.

10. Review

This procedure will be reviewed annually or sooner following:

- attempted or actual fraud;
- insurer requirement changes;
- banking process changes;
- internal control review findings.

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