Pony Partnerships CIC

HUMAN EQUINE INTERACTION REGISTER
HEIR
Approved to the UK Register 2026

Payment Verification and Anti-Fraud Policy 2026-2027

Name of Organisation: Pony Partnerships CIC
Venue/Address: All venues
Date of Review: 1 September 2026
Date of Next Review: 31 August 2027
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1. Policy Statement

Pony Partnerships CIC is committed to protecting its finances, assets, reputation, and community benefit objectives by maintaining effective financial controls and reducing the risk of fraud.

As a Community Interest Company, Pony Partnerships CIC is committed to ensuring that all income, grants, and resources are managed responsibly, transparently and in furtherance of its community benefit objectives.

We recognise that payment fraud and cyber-enabled financial crime are increasing risks. We are committed to ensuring that all financial transactions are carried out safely, transparently and with appropriate verification.

All individuals involved in financial processes have a responsibility to remain vigilant and report suspected fraud or financial irregularities immediately.

2. Purpose

This policy aims to:

- reduce the risk of fraud and financial loss;
- ensure appropriate verification of payment requests;
- protect organisational funds and assets;
- support compliance with legal and regulatory responsibilities;
- promote transparency and accountability;
- provide a framework for reporting suspected fraud.

3. Scope

This policy applies to:

- directors and trustees;
- employees;
- associates;
- volunteers involved in financial administration;
- contractors acting on behalf of Pony Partnerships CIC.

It applies to all financial transactions undertaken by or on behalf of Pony Partnerships CIC, including:

- supplier payments;
- bank transfers;
- invoices;
- expense claims;
- payroll information;
- changes to supplier or employee bank details;
- online banking;
- grant funding and commissioned income.

4. Responsibilities

- Board of Directors: Responsible for ensuring appropriate financial governance and oversight.
- CEO: Responsible for ensuring appropriate financial controls are implemented and reviewed.
- Staff and Volunteers: Responsible for following financial procedures, verifying payment requests appropriately, reporting concerns promptly and protecting confidential financial information.

5. Payment Verification

Pony Partnerships CIC will verify payment requests before funds are released.

Verification arrangements may include:

- confirming supplier identity;
- independently verifying requests to change bank account details;
- checking invoices against approved purchases or contracts;
- confirming payment authorisation;
- using dual authorisation where appropriate.

Requests to change bank account details must never be accepted solely on the basis of an email or text message.

Where there is any doubt, the request must be verified using an independently obtained telephone number or another trusted method of communication.

6. Fraud Prevention

Pony Partnerships CIC will take reasonable steps to reduce the risk of fraud, including:

- maintaining appropriate financial controls;
- separating duties where practicable;
- restricting access to banking systems;
- monitoring financial transactions;
- maintaining secure records;
- providing staff awareness and training.

Examples of fraud may include:

- false invoices;
- mandate fraud;
- payment diversion fraud;
- phishing;
- identity theft;

- misuse of organisational funds;
- theft of assets;
- false expense claims.

7. Cyber-Enabled Financial Crime

Many frauds now originate through cyber-attacks.

Staff involved in financial processes should remain alert to:

- phishing emails;
- fake invoices;
- requests to change payment details;
- urgent requests for payment;
- impersonation of colleagues or suppliers;
- suspicious telephone calls.

Any unexpected financial request should be treated with caution until independently verified.

8. Reporting Concerns

Any suspected fraud, attempted fraud or financial irregularity must be reported immediately to the CEO or a Director.

Examples include:

- suspicious invoices;
- unusual payment requests;
- suspected financial abuse;
- unauthorised transactions;
- missing funds;
- cyber-enabled payment fraud.

Concerns will be investigated promptly and confidentially.

Where appropriate, matters may be referred to the police, bank, insurers, commissioners, or other relevant authorities.

9. Confidentiality

Financial information will be handled confidentially and shared only with individuals who require access as part of their role.

Banking information, supplier details, and financial records will be protected in accordance with organisational data protection and information security arrangements.

Where financial information is lost, accessed without authority, or sent to the wrong person, this must also be managed in line with the Privacy and Data Protection Policy and Cyber Security and Information Security Policy.

10. Training and Awareness

Individuals responsible for financial administration will receive appropriate information, instruction, and training relevant to their responsibilities.

Training may include:

- fraud awareness;
- payment verification;
- phishing awareness;
- cyber security;
- financial procedures;
- information security.

11. Monitoring and Review

Pony Partnerships CIC will review:

- payment processes;
- fraud prevention arrangements;
- financial incidents;
- audit findings;
- training needs.

Lessons learned from incidents or attempted fraud will be used to strengthen financial controls.

12. Review

This policy will be reviewed annually, or sooner if:

- legislation changes;
- significant fraud risks emerge;
- financial systems change;
- an incident identifies a need for review.