Selsey Community Forum
Anti-Fraud, Theft and Financial Misconduct Policy

Policy Statement

Selsey Community Forum will continually strive to ensure that all its financial and administrative processes are carried out and reported honestly, accurately, transparently and accountably and that all decisions are taken objectively and free of personal interest.

All members of the Selsey Community Forum have a responsibility for putting these principles into practice and for reporting any breaches they discover. This document sets out the policy and procedures of the Selsey Community Forum against fraud and other forms of dishonesty.

It applies to Trustees, staff and volunteers. Any employee who commits fraud, theft or other dishonesty, or deliberately fails to report a known concern in breach of this Policy, may be subject to disciplinary action in accordance with the Charity's disciplinary procedure. Appropriate action may also be taken in relation to trustees, volunteers or other individuals associated with the Charity.

The Selsey Community Forum complies with applicable legislation, including the Fraud Act 2006, the Bribery Act 2010 and with other regulatory requirements and applicable guidance.

Definitions

a. Fraud: Dishonest conduct intended to make a gain, cause a loss, or expose another person or organisation to a risk of loss. Fraud may include false representation, failure to disclose information where there is a legal duty to do so, abuse of position, falsification of records, misuse of funds or assets, cyber-enabled fraud, or attempted fraud. Attempted fraud will be treated as seriously as completed fraud.
b. Theft: Dishonestly appropriating property belonging to another with the intention of permanently depriving them of it. Misuse of Charity property may also be addressed under this policy even where the conduct does not amount to criminal theft.
c. Misuse of equipment: Deliberately misusing materials or equipment belonging to the Selsey Community Forum for financial or material benefit.
d. Abuse of position: Exploiting a position of trust within the Charity for financial or material benefit.

Culture

Selsey Community Forum fosters honesty and integrity in its organisation. Trustees, staff and volunteers are expected to lead by example in adhering to policies, procedures and practices. Equally, members of the public, service users and external organisations (such as suppliers and contractors) are expected to act with integrity and without intent to commit fraud against the Charity.

Trustees are expected to deal promptly, firmly and fairly with suspicions and allegations of fraud or corrupt practice.

Responsibilities

In relation to the prevention of fraud, theft, misuse of equipment and abuse of position, specific responsibilities are as follows:

a. Trustees:

The Trustees are responsible for establishing and maintaining a sound system of internal control that supports the achievement of the Charity's policies, aims and objectives. The system of internal control is designed to respond to and manage the whole range of risks which the Charity faces. The system of internal control is based on an on-going process designed to identify the principal risks, to evaluate the nature and extent of those risks and to manage them effectively. Managing fraud risk is seen in the context of the management of this wider range of risks.

The Trustees will ensure, so far as reasonably practicable, that key financial duties are appropriately separated and that no one individual has sole control over authorising, processing and reviewing significant financial transactions. Where full separation of duties is not practicable, appropriate trustee oversight or other compensating controls will be put in place.

b. The Chairman:

The Board of Trustees retains overall responsibility for the Charity's management of fraud risk. Day-to-day coordination of the Charity's anti-fraud arrangements may be delegated to the Chair of Trustees or another nominated trustee.

The responsibilities of the nominated lead include:

- Undertaking a regular review of the fraud risks associated with key organisational objectives.
- Establishing an effective anti-fraud response plan.
- Establishing appropriate mechanisms for:
  - reporting fraud risk issues
  - reporting significant incidents of fraud or attempted fraud to the Board of Trustees;
- Liaising with the Charity's appointed Auditors.
- Making sure that all staff and volunteers are aware of the Charity's Anti-Fraud Policy and know what their responsibilities are in relation to combating fraud;
- Ensuring that appropriate action is taken to minimise the risk of frauds occurring in future.

c. Staff/Volunteers:

All members of staff and volunteers are responsible for:

- Acting with propriety in the use of Charity's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers;
- Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty and leadership;
- Being alert to the possibility that unusual events or transactions could be indicators of fraud;
- Alerting their manager when they believe the opportunity for fraud exists eg. because of poor procedures or lack of effective oversight;
- Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events; and
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

Concerns may also be raised under the Charity's Whistleblowing Policy where appropriate. No worker will be subjected to unlawful detriment or dismissal for making a protected disclosure in accordance with the applicable whistleblowing legislation.

Awareness and Prevention

Trustees, staff and volunteers will be made aware of this Policy and of the procedures for reporting suspected fraud, theft or financial misconduct. Appropriate guidance or training will be provided where relevant to an individual's role and level of responsibility.

The Charity will keep its financial controls under review and will consider emerging risks, including cyber-enabled fraud and changes to working practices or payment methods.

Detection and Investigation

The Chair of Trustees must be notified promptly of all significant financial or accounting irregularities or suspected irregularities, including those affecting cash, equipment, property, remuneration or other Charity assets. Where the concern involves the Chair, it should instead be reported to another trustee nominated for this purpose or directly to the Board of Trustees.

Reporting of suspected irregularities is essential for the following reasons:

- Facilitates a proper investigation and ensures the consistent treatment of information regarding fraud and corruption.
- When a concern is reported, the Charity will decide promptly how the matter should be investigated and who is appropriate to carry out that investigation. Depending on the circumstances, this may include a trustee, senior manager, external adviser, auditor or other suitably independent person.

No individual should attempt to investigate suspected fraud independently, confront the person concerned, alter relevant records or take any action that could compromise evidence or prejudice a subsequent investigation.

The designated auditor or other advisor will:

- Deal promptly with the matter.

- Record evidence received.
- Ensure the security and confidentiality of evidence.
- Work closely with the Charity and other agencies, such as the Police and Courts to ensure that all issues are properly investigated and reported upon.
- Ensure maximum recoveries are made on behalf of the Charity.

External Reporting

Where fraud or attempted fraud is suspected or identified, the Charity will consider whether the matter should be reported to Report Fraud, the police or another relevant authority. The Trustees will also consider whether the matter constitutes a serious incident that must be reported promptly to the Charity Commission. Where appropriate, the Charity will also consider whether notification is required to HMRC, the Information Commissioner's Office, funders, insurers or any other relevant regulator or stakeholder.

Reporting to another authority does not remove the need to consider whether a separate serious incident report to the Charity Commission is required. Suspected or actual theft should normally be reported to the police where appropriate, and the Charity will consider whether a serious incident report to the Charity Commission is also required

Post-Incident Review

Following any suspected or confirmed fraud, attempted fraud, theft or financial irregularity, the Charity will review how the incident occurred and whether existing systems, procedures or internal controls were adequate. Appropriate improvements will be implemented to reduce the risk of recurrence.

Review

This Policy applies to all activities undertaken by Selsey Community Forum. It will be reviewed at least annually and sooner where there is a significant fraud or attempted fraud incident, a material change in risk, or a relevant change in legislation or Charity Commission guidance.

Version Control

Version Number	Date of Update	Amendments
1.0	October 2025	Annual Review
2.0	October 2026	Reviewed and updated in line with current guidance