



YOUNG SOMERSET | BOARD POLICY

Anti-Fraud Policy

Policy | 2026 edition

POLICY OWNER	Vicky Thomas
APPROVED BY	Board of Trustees
APPROVAL DATE	24 September 2026
EFFECTIVE DATE	
REVIEW DATE	
STATUS	Draft

Linked procedure: 'Fraud Prevention & Response Procedure' document must be read alongside this document. Operational detail is deliberately maintained outside this Board-approved policy.

POLICY CONTENT

1. Purpose

This policy is designed to protect Young Somerset's assets, beneficiaries and reputation from the potential occurrence of fraud. Young Somerset has a commitment to high legal, ethical and moral standards, and we expect all staff to share this commitment too. The policy, alongside the supporting procedure document, is designed to promote awareness for fraud and embed an Anti-Fraud culture throughout the organisation. It applies in scenarios where Young Somerset is both the potential victim or improper beneficiary of fraudulent activity

The policy is informed by the fraud-prevention principles contained in the government guidance issued under the Economic Crime and Corporate Transparency Act 2023

2. Scope

This policy applies to any irregularities involving trustees, employees, volunteers, consultants, vendors, contractors, customers and any other persons providing services for or on behalf of Young Somerset.

Both actual, attempted and suspected fraud are also covered by this policy, including internal, external, digital and collusive fraud.

Everyone within the scope must report suspected or attempted fraud, control weaknesses and related concerns promptly using the routes set out in the Fraud Prevention and Response Procedure or Whistleblowing Policy. Individuals should not investigate themselves.

3. Policy statement

For the purposes of this policy, fraud means dishonest conduct; including false representation, failure to disclose information, abuse of position or false accounting – intended to make a gain for oneself or another, or to cause or expose another person or organisation to a risk of loss. It includes conduct intended to benefit Young Somerset, even if this benefit is obtained or not.

The below statements set out Young Somerset's core position:

1. Any forms of fraud, dishonesty and deliberate financial misrepresentation will not be tolerated.
2. Nobody may commit or facilitate fraud to secure funding, meet targets, protect a service, benefit a beneficiary or create an apparent benefit for Young Somerset.
3. All concerns will be considered promptly, fairly and where appropriate, independently, under the responsibility of the Chief Executive Officer.
4. Anyone raising a concern in good faith will be protected from retaliation.
5. Young Somerset will cooperate with law enforcement and other authorities/professional bodies where appropriate.
6. Where an allegation is substantiated; disciplinary, contractual, civil recovery and criminal action may follow, as appropriate. All investigations will be conducted fairly, and self-reporting does not prevent investigation.

4. Policy commitments

Young Somerset will:

1. **Top-level commitment:** trustees and senior leaders will promote a culture in which fraud is never accepted as a way of achieving charitable objectives.
2. **Risk assessment:** Young Somerset maintains a documented and regularly reviewed fraud-risk assessment.
3. **Proportionate procedures:** the preventative controls outlined in both the policy and procedure reflect the nature and level of identified risks in the assessment.
4. **Due Diligence:** appropriate checks are and will be applied to employees, agents, contractors, delivery partners and other persons providing services on behalf of Young Somerset.
5. **Communication and training:** expectations, reporting routes and relevant controls will be communicated and supported by training.
6. **Monitoring and review:** controls will be tested, incidents and near misses are reviewed and improvements tracked accurately.

This policy identifies the following high-level areas as being the most susceptible to fraud:

- Donations, fundraising and Gift Aid
- Grants, restricted funds and funder reporting
- Cash handling
- Debit/Credit card fraud
- Cyber-enabled fraud
- Payroll, timesheets and expense claims

GOVERNANCE AND CONTROL

5. Roles and accountability

Accountability	What belongs in the policy
Board of Trustees	Approves the policy, sets Young Somerset's anti-fraud expectations and holds the Chief Executive to account for their implementation of the
Chief Executive / SLT	Ensures the policy is implemented, resourced and monitored.
Policy Owner	Maintains the linked procedure, guidance, training and assurance evidence. Ensure policy is up to date with changing laws.
Managers	Apply the policy consistently and escalate exceptions or concerns.

Accountability	What belongs in the policy
Workers and volunteers	Understand and follow the policy and its linked procedure. Report any concerns to the appropriate person through the specified reporting routes.

6. Assurance, exceptions and review

Fraud risks will be formally reviewed at least annually and following any significant incident or organisational change. Furthermore, the board will be regularly assured regarding the training, risk assessment, control testing, incidents and corrective actions being taken within the organisation. Any removal of existing controls must be verified by the Chief Executive, and if necessary, the board.

The policy will be reviewed every three years, or, following legal change, significant fraud or material control failure

7. Related documents

LINKED PROCEDURE	Fraud Prevention & Response Procedure
SUPPORTING GUIDANCE / FORMS	Whistleblowing Policy Financial Regulations Conflicts of Interest Policy Data Protection Policy
RELEVANT LAW / STANDARDS	Economic Crime and Corporate Transparency Act 2023 Charity Commission "Protect your charity from fraud" guidance

8. Version control

Version	Approved	Review due	Summary