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# CHARITY FRAUD REPORT 2022

PROTECTING YOUR CHARITY  
IN UNCERTAIN TIMES



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*As a small charity ourselves we want to support our fellow charities and help protect them from fraud. Long experience shows that in times of recession fraud risks are often greatest just when defences are weakest.*

*Our advice to charities is simple: now is not the time to take your eye off the ball. Take fraud risks as seriously as you can. Use these survey findings to learn from others, and then strengthen your own counter fraud activities.*



**SIR DAVID GREEN CB KC**  
CHAIR, FRAUD ADVISORY PANEL

# FOREWORD

**All organisations, big or small, profit or non-profit, are at risk of fraud and may be targeted by ruthless fraudsters who proactively seek out weaknesses and exploit vulnerabilities. The charity sector is not immune from this ongoing threat.**

Everyone is under increasing financial pressure from the escalating costs of goods and services and increasing inflation leading to the current cost-of-living crisis. In this context, many charities will be struggling to keep essential and often life-saving services running at a time when demand is rapidly increasing, but levels of institutional funding and donations from the public are in decline. As Michael Beckett, a charity CEO recently pointed out, fraudsters will also be feeling the effects of the cost-of-living crisis, and this will incentivise them to come up with new and innovative ways to get access to a charity's evermore valuable (and limited) resources. Ordinarily law-abiding individuals may also be driven to pursue fraudulent activity by the pressure of their financial situation.

This is the second year that BDO and the Fraud Advisory Panel have collaborated to conduct the Charity Fraud Survey in order to better understand the impact of fraud on the charity sector. We identified that there was no similar survey that was being conducted annually to reflect the charity sector specifically, so we began this initiative to provide a focused lens on specific charity-related fraud risks.

Our aim is to:

- ▶ Raise awareness of charity fraud
- ▶ Identify fraud-related risk issues and the types of fraud the sector is vulnerable to
- ▶ Understand how charities cope with fraud should the worst happen
- ▶ Recognise best practice when it comes to fraud prevention and response.

We hope this window into the sector's shared experiences of fraud will help charities identify their own fraud risk hotspots in the context of the wider fraud risk landscape, and use these insights to defend themselves appropriately. As the country grapples with the current volatile societal and economic climate, it is even more important for charities to be aware and take steps to manage fraud risk.

The survey was run in October 2022 alongside Charity Fraud Awareness Week, an award-winning campaign spearheaded by the Fraud Advisory Panel and run by a partnership of charities, regulators, law enforcers, representative and umbrella bodies, and other not-for-profit stakeholders from across the world. The purpose of the week is to raise awareness of fraud and cybercrime affecting the sector and to create a safe space for charities and their supporters to talk about fraud and share good practice.

We would like to thank all those who took the time to share their experiences and take part in this survey – your efforts have provided us with a valuable insight. As we navigate through the uncertainty of the months ahead, we encourage charities to be vigilant, challenge and ask questions, and report anything that doesn't look quite right; the earlier suspicions are reported, the quicker and more effectively issues can be dealt with.



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# KEY FINDINGS

SINCE OUR LAST SURVEY A YEAR AGO, THE ECONOMIC LANDSCAPE OF THE UK HAS SEEN A GREAT SHIFT. THE PROSPECT OF THE UK'S BIGGEST RECESSION LOOMS LARGE, INFLATION AND THE COST-OF-LIVING IS ROCKETING, AND WE HAVE SEEN WAVES OF POLITICAL AND ECONOMIC INSTABILITY WITH IMMEDIATE KNOCK-ON EFFECTS TO EVERY HOUSEHOLD AND ORGANISATION IN THE UK.

IT IS A PARTICULARLY DIFFICULT TIME FOR CHARITIES. BALANCING INSTITUTIONAL SPENDING CUTS AND REDUCED PUBLIC DONATIONS AT A TIME OF HEIGHTENED DEMAND FOR SERVICES, WHILST ALSO ATTEMPTING TO MAINTAIN APPROPRIATE LEVELS OF INVESTMENT IN MITIGATING FRAUD RISK AND PREVENTING FRAUD LOSSES IS NOT EASY. THE LATTER MIGHT SEEM TO BE A LOWER PRIORITY DURING A COST-OF-LIVING CRISIS, BUT MANY FRAUD LOSSES ARE PREVENTABLE WITH SUFFICIENT KNOWLEDGE AND AWARENESS OF THE RISKS. INVESTMENT IN FRAUD RISK MANAGEMENT PAYS DIVIDENDS IN THE LONG RUN.

IN THIS YEAR'S REPORT, WE OFFER A SNAPSHOT VIEW OF HOW SOME CHARITIES IN THE UK – PARTICULARLY THOSE WITH INCOME GREATER THAN £500K – HAVE BEEN AFFECTED BY FRAUD OVER THE LAST YEAR, HOW CHARITIES PERCEIVE THEIR FRAUD RISK, AND IMPORTANTLY, WHAT LIES AHEAD FOR CHARITIES IN THEIR BATTLE TO COMBAT FRAUD RISK DURING A TIME OF GREAT UNCERTAINTY.



think the risk of fraud is going to increase over the next 12 months



reported fraud or attempted fraud



of reported frauds were perpetrated by staff or volunteers



think their financial investment in fraud prevention is insufficient



think hybrid working has increased the risk of fraud



experienced financial loss due to fraud



said over-reliance on trust most common obstacle in preventing fraud



cited cyber as the biggest fraud risk over the next 12 months

#### Note on the data:

This data is a snapshot of the UK charity sector and is to be interpreted only as a general overview of the views and experiences of the sample base. This report is drawn from 100 respondents from UK based charities, the breakdown of which can be seen on the next page. The survey included a mixture of quantitative and qualitative questions. Comparison data was derived from research conducted by BDO and the Fraud Advisory Panel in 2021. This year's survey included some different questions to the 2021 survey and has a larger sample of respondents.



# WHO DID WE SURVEY?

## What type of charity are you?

**Charitable company (limited by guarantee)**  
67%

**Charitable Incorporated Organisation (CIO)**  
8%

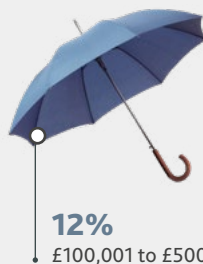
**Royal Charter**  
8%

**Trust**  
9%

**Unincorporated Association**  
8%



## What is your charity's total annual income?



## What role do you hold within the charity?

**FD/Finance Team**  
46%

**Trustee**  
14%

**CEO**  
11%

**Risk/Internal Audit**  
9%

**Other**  
12%

**Board**  
2%

**Fraud Team**  
6%



# WHAT DID CHARITIES TELL US?



## 1

### FRAUD RISK: IS THE RISK OF CHARITY FRAUD INCREASING?

We asked charities whether they had experienced more instances of fraud or attempted fraud in the last 12 months compared to the previous 12 months; responses were fairly evenly split. Only 30% agreed or strongly agreed that they had experienced more instances of fraud, whilst 39% disagreed. Interestingly, when asked whether they thought the risk of fraud was going to increase over the next year, the simple answer was yes; **58% thought the risk of fraud would increase over the next 12 months**. Only 1% thought it would decrease. This contrasts with last year

when expectations were that levels of fraud would either stay the same or increase. This shift in perception could be a reaction to the increasing financial pressures on individuals and organisations caused by the ongoing cost-of-living crisis and economic uncertainty and the changing fraud risk landscape, or due to an increase in actual attempts of fraud. Whatever the external influences might or might not be, fraud is not a risk that will go away and charities need to be prepared to protect themselves - especially in the current climate where fraud losses could impact charities harder.

## 2

### FRAUD RISK: WHAT FRAUD RISKS ARE CONCERNING CHARITIES THE MOST?

To try and gauge what lies ahead, we asked charities what their biggest fraud risk was likely to be over the next 12 months. **Cybercrime and cybersecurity were cited most often by respondents**, and in particular concerns about hacking, phishing and social engineering attacks leading to payment/bank fraud - no doubt a consequence of operations being significantly reliant on IT infrastructure.

Charities also identified the economic downturn and cost-of-living crisis as potential catalysts for an increased risk of fraud, as demand for their services spike and/or more individuals and organisations come under financial pressure.

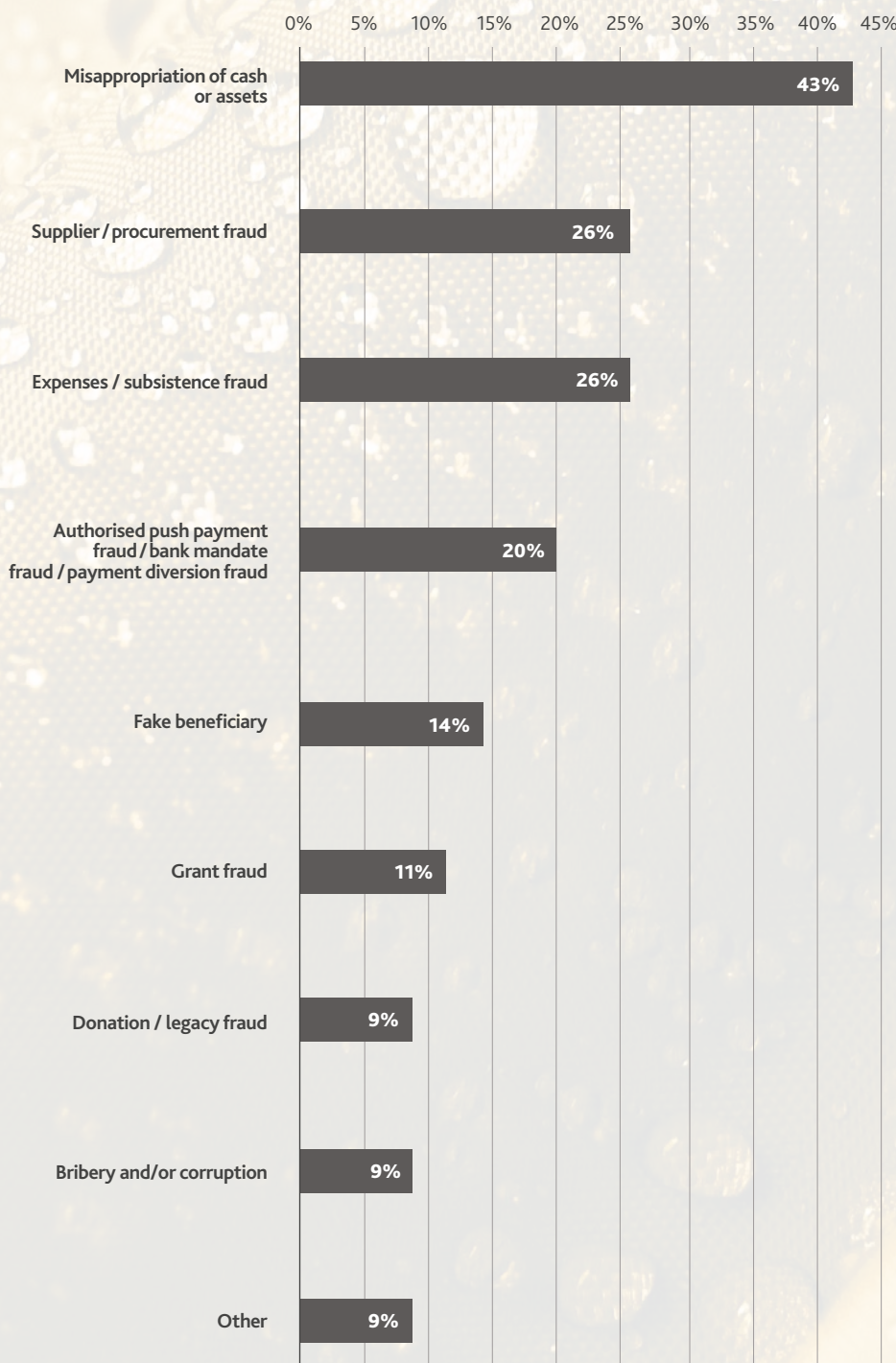
Other risks included a lack of staff awareness, a lack of qualified staff, under-resourced team structures or frequent personnel changes.

In addition, 40% of respondents agreed or strongly agreed that hybrid working had increased the risk of fraud to their charity. Post-pandemic, hybrid working has become part of standard working practices for many organisations, so it is important to assess the risk profile of any new or changed working practices and implement new controls and procedures to manage that risk accordingly.

## 3

## REPORTED FRAUD: WHAT FRAUDS HAVE CHARITIES SUFFERED OVER THE LAST 12 MONTHS?

### What type of fraud did your charity suffer?



Most charities that experienced fraud or attempted fraud in the last 12 months were charities with income over £500k; only two charities with income below £500k had experienced fraud.

In last year's report we highlighted that payment diversion fraud was the most common type of fraud experienced by respondents (37%), followed by misappropriation of cash or assets (21%). This year, there appears to have been a shift away from the external threat with a greater focus on the threat from within, at least from the perspective of frauds that were detected by respondents. Only 20% of respondents reported payment diversion fraud, but the internal threat from misappropriation of cash or assets by staff members or volunteers doubled to become the most common type of fraud (43%), followed closely by staff expenses fraud (26%).

**Overall, 46% of detected frauds were perpetrated by a staff member and 9% by a volunteer.** Only 23% of frauds were committed by an external party with no connection to the charity. Charities need to remain vigilant to the internal threats to be effective in combatting fraud risk.

Another significant change from last year is a five-fold increase in supplier/procurement fraud (increasing from 5% to 26%). This type of fraud often involves collusion between an insider and the external party.

In summary, it is difficult to draw definitive conclusions from these results. Firstly, because this is mainly representative of charities with income over £500k. Secondly, on the one hand, it could mean that charities are better at preventing or deterring certain types of fraud (by increasing staff awareness or introducing more robust controls and checking procedures) or, on the other hand, they are better equipped to detect certain types of fraud whilst other types of fraud go undetected. The better charities understand their fraud risk and implement measures to prevent and detect it, the more accurate fraud reporting will become.

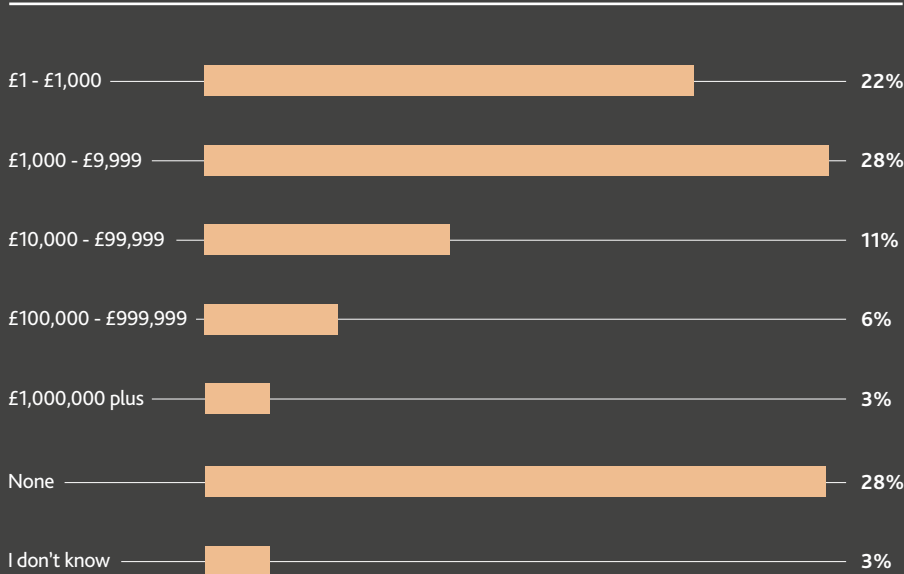
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REPORTED FRAUD: WHAT IS THE IMPACT OF FRAUD ON CHARITIES?

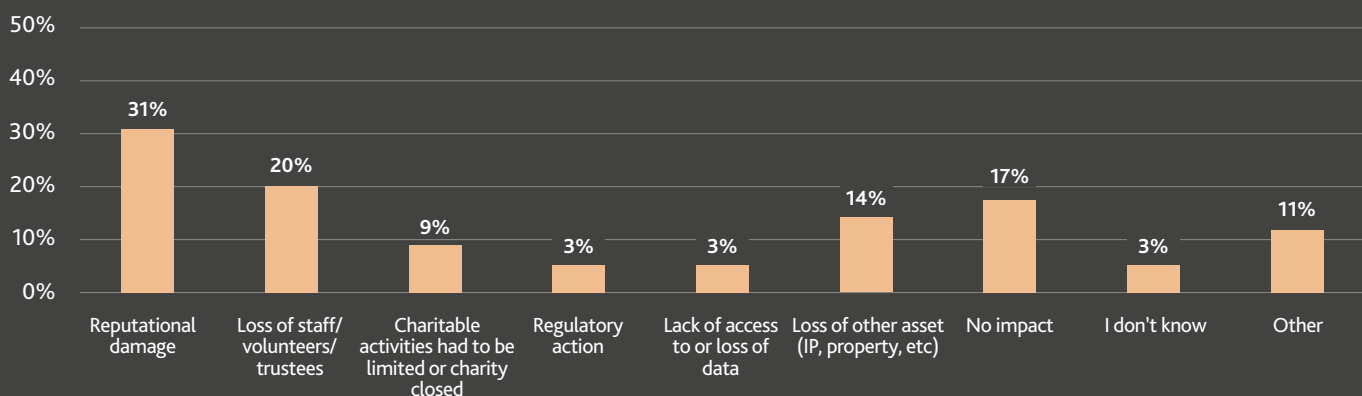
Alongside the overall concern that fraud risk is increasing, this year's survey also shows that financial losses from fraud are increasing. Last year, 42% of respondents that suffered a fraud in the previous 12 months had fortunately not suffered a financial loss. In contrast, this year's results show that of the charities who suffered a fraud, more than two thirds resulted in a financial loss. Most charities that reported a financial loss due to fraud said their loss was under £100k (88%).

Of course, financial loss is not the only impact that fraud can have on a charity. 31% of respondents said they suffered reputational damage as a result of the fraud. This could have knock-on effects to income streams (for example donations, if the public lose confidence in the charity's ability to manage its finances). 20% said that the fraud resulted in a loss of staff, volunteers and trustees, 14% said they had lost other assets like IP and property, and 9% said that charitable activities had to be limited or stopped. Interestingly, 36% of respondents that reported a fraud in the past 12 months said that other than a financial loss, there had been no other impact for the organisation as a result of the fraud. In our experience, fraud can have a far-reaching ripple effect across organisations and if it is not dealt with appropriately it can adversely impact on staff, volunteers, beneficiaries, donors and suppliers. The true impact of fraud on charities should not be underestimated.

What was the total estimated financial loss to your charity?



In what other ways did the fraud have an impact on your charity?





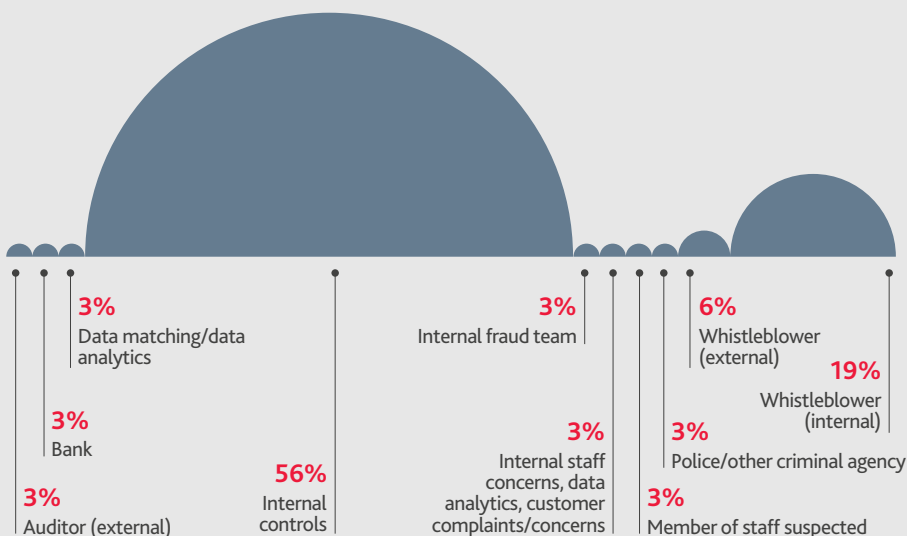
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REPORTED FRAUD: HOW ARE FRAUDS DETECTED BY CHARITIES?

An encouraging sign from our respondents is the ways in which they had detected cases of fraud.

Detecting fraud is one of the most challenging aspects of the fraud risk management framework. **Unsurprisingly, we see that internal controls (56%) and internal whistle-blowers (19%) were by far the most common sources of suspected fraud referrals.** This shows how important it is for charities to ensure that (a) their control environment is designed with the risk of fraud in mind, (b) there is appropriate fraud awareness across the organisation at all levels, and (c) there is a clear path to report concerns about suspected fraud with confidence.

How was the fraud detected?



*Fraud increases in times of economic uncertainty. We, in the charity sector, should recognise this and review our fraud risks and responses accordingly. When fraudulent attacks are made against Cancer Research UK it has a direct cost to people affected by cancer and to our volunteers and supporters who give up hours of time fundraising for essential donations that will pay for research that is helping us to beat cancer. It is therefore essential that we manage the risk of fraud, even though it is unpalatable to think of people stealing from us."*



**PHIL SAPEY**  
Counter Fraud Manager,  
Cancer Research UK



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**REPORTED FRAUD: WHAT ACTIONS ARE CHARITIES TAKING AFTER A FRAUD?**

We have seen the impact that fraud can have on charities, but what actions are charities taking when fraud occurs?

**What action did your charity take against the alleged fraudster?**

43%

Referred to the police

43%

Internal disciplinary action

17%

Other

14%

Civil recovery

9%

No action

6%

I don't know

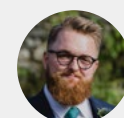
Of the charities who said they had suffered a fraud in the last 12 months, 43% reported the fraudster to the police compared to 63% in last year's survey. A similar proportion chose to deal with the fraud through internal disciplinary action (43%) which is a lot higher than 11% in the prior year.

Although there has been a 20% decrease in referrals to the police compared to last year's results, there has been an overall increase in other action being taken. Almost half of those who stated they referred the matter to the police also took internal disciplinary action, which is a marked shift from last year's results. It suggests that there is an increasing appetite to hold fraudsters to account through the pursuit of parallel sanctions.

We also asked charities about remedial actions taken after an instance of fraud. Two thirds of respondents stated that they had instigated control changes, and around a third had made policy changes and staff changes including dismissal of employees and volunteers. Although reactionary, it is encouraging that so many charities are taking these steps to improve their resilience after an incident of fraud to tackle the root causes and prevent future incidents. After all, the very best step that charities can take to avoid fraud is to be proactive in having robust and up to date fraud prevention procedures.



*The risk and sophistication of fraud schemes are increasing; so too should the resources allocated for prevention and response. A senior leadership team that sets a proactive agenda, be it in a round of budget planning or an all-staff meeting, is an invaluable support to an organisation's counter fraud function."*



**ROBB MONTGOMERY**  
Head of Counter Fraud,  
Save the Children  
International

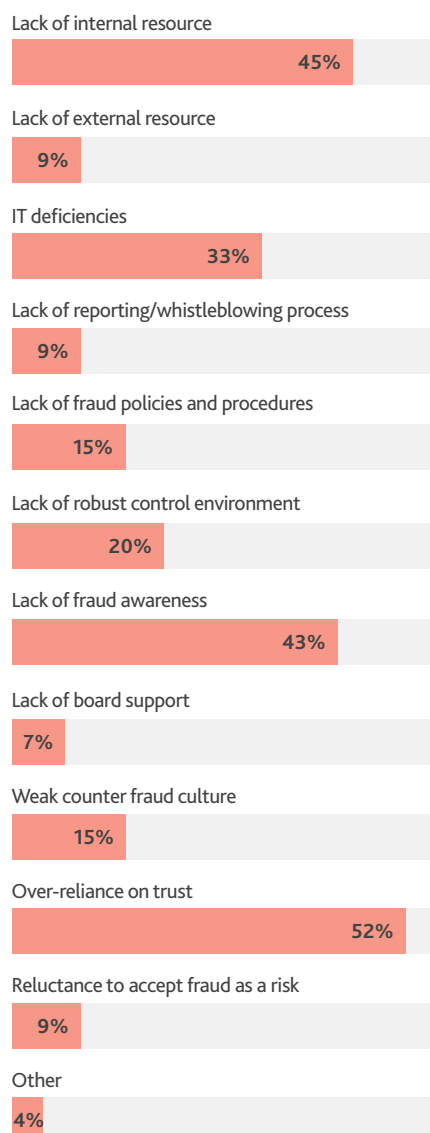


## 7

## FRAUD PREVENTION: WHAT ARE THE BARRIERS?

Understanding what charities' fraud risks are and making sure prevention measures are in place are two exercises charities should be completing on a regular basis. We asked charities to tell us the main obstacles they faced (if any) in preventing fraud.

### What obstacles does your charity face in preventing fraud?



### The most common obstacle was a culture of over-reliance on trust, with 52% of charities identifying it as a key concern.

While trust can be a fundamental part of organisational culture and often a necessity, when there is a lack of resource and teams are stretched, it is not an anti-fraud control. Unfortunately, in our experience, it is often some of the most trusted and long-standing employees who take advantage of that trust when the opportunity arises. Trust needs to be balanced with a robust anti-fraud culture, fraud awareness, effective internal controls and a segregation of duties, to ensure that checks and balances are in place and to encourage individuals to speak up if there is something they are unsure of. The key is to 'trust but verify'.

45% of respondents cited lack of internal resource (ie, people) as a barrier to fraud prevention – this is something to keep an eye on given that the economic climate and cost-of-living crisis may put even further strain on charities' resources and programmes. As teams become more and more stretched, the easier it is for a potential fraud to go unnoticed.

A lack of fraud awareness was cited as a concern for 43% of respondents. Interestingly, 47% of respondents also said they did not know when their organisation last conducted fraud awareness training, or hadn't conducted training in at least the last three years. Staff and volunteers are the eyes and ears of every organisation and by proactively arming them with knowledge and awareness on a regular basis, fraud risk can be effectively managed.

33% said that IT deficiencies were an obstacle to fraud prevention, which is an issue given the increased concern around cyber-enabled fraud and the potential cost implications that come with widespread infrastructure upgrades.

20% of respondents said that a lack of a robust control environment was an obstacle to good fraud prevention. This is a concern given that 56% of fraud experienced by charities was detected through internal controls which demonstrates the fundamental importance for fraud detection.





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**FRAUD PREVENTION: ARE CHARITIES FINANCIALLY PREPARED?**

To understand how well charities are prepared to tackle fraud, we asked about their financial investment in fraud prevention over the last 12 months. Just over a third (39%) of respondents said their financial investment had increased, compared to 23% last year. The number of charities that said they do not invest financially at all fell from 14% last year to only 8% this year. It is encouraging that more charities are seeing the benefits of investing in fraud prevention.

A majority of respondents (58%) agreed or strongly agreed that their financial investment in fraud prevention was enough to address their fraud risks. However, **15% of respondents thought their charity's current investment was insufficient.**

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**FRAUD PREVENTION: WHAT MEASURES DO CHARITIES HAVE IN PLACE?**

The old adage, *prevention is better than cure*, holds true when it comes to good fraud risk management. We asked charities what fraud prevention measures they had in place in their organisation.

**Does your charity have any of the following?**



Policies are a good indication of whether a charity has considered the various risks associated with fraud. Most charities said they had conflicts of interest (84%) and whistleblowing (82%) policies in place. Fewer respondents said they had Cybersecurity (65%) or anti-fraud (64%) policies. Given that fraud and cybercrime are key issues highlighted by the Charity Commission and the Fraud Advisory Panel, the number of charities with anti-fraud and cybersecurity policies feels a little low. It is important for charities to implement an anti-fraud policy - without one, charities may not be appropriately managing their risk of fraud.

In terms of response, charities were more likely to have fidelity or cyber insurance (52%) than a cyber response plan (42%) or fraud response plan (33%). Without response plans, charities risk having an uncoordinated response to incidents, which could result in increased management time and resources being deployed. Delays in responding to allegations of fraud and instances of cybercrime may also lead to

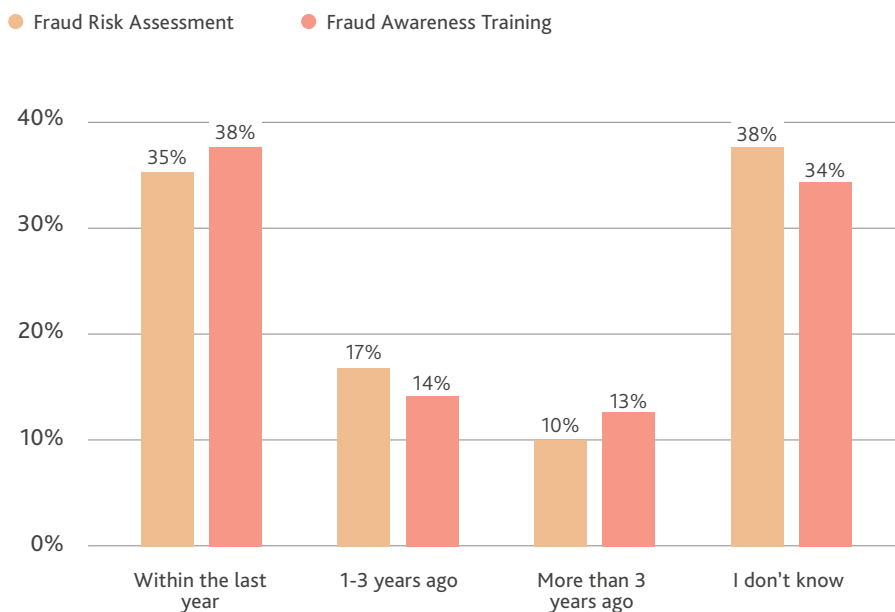
further losses or jeopardise the charities' ability to recover any losses.

When we compared the results of charities with various anti-fraud measures in place to those who suffered a fraud in the last 12 months, we identified a correlation between the two – charities who experienced fraud were more likely to have eight or more anti-fraud measures in place, compared to a lower number for the majority of charities who stated that they had either not suffered a fraud or did not know if they had suffered a fraud. This suggests that when fraud risk management is higher on a charity's agenda, the more likely it is that fraud will be detected. Charities should not take any false assurance from not experiencing fraud or attempted fraud in the last 12 months – it could be because they are not looking for it or their control environment is not fit for purpose – this is perception versus reality. Fraud, by its very nature, is committed under the radar and without trying to look for it, the crime will continue, and losses will mount.

**Charities should not take any false assurance from not experiencing fraud or attempted fraud in the last 12 months – it could be because they are not looking for it or their control environment is not fit for purpose – this is perception versus reality.**



**Whether performed internally or by an external provider, when was the last time your charity had a fraud risk assessment/fraud awareness training?**



Over a third of respondents said that they had conducted a fraud risk assessment and fraud awareness training in the last year, increasing to over half within the last three years. This means that just under half of respondents (though still a significant proportion) had not, or do not know when those activities were last completed.

Fraudsters are constantly finding new methods to successfully defraud organisations. Completing fraud risk assessments and fraud awareness training every year is an important way to address internal and external risks and ensure that the most up to date fraud risk landscape is being considered.

# PREVENTING CHARITY FRAUD

## WHAT DO YOU NEED TO KNOW?

This year's results have shown an increase in reported frauds and financial losses. This is a reminder that fraud is an inherent risk that is not going anywhere. Although this does not necessarily ring as good news, what it does tell us is that charities are doing more to detect and prevent fraud. The survey results certainly show this with the improved levels of investment in countering fraud which is a positive direction of travel for the majority of the sector.

When charities effectively manage the risk of fraud, it will invariably result in more frauds being uncovered. Although dealing with those frauds is extremely challenging, it affords charities the opportunity to stop the losses and seek recovery. Through careful consideration of counter-fraud measures, charities can reduce their chances of becoming a victim and, if the worst happens, be able to act swiftly to minimise damage and reduce losses. In the long term this will mean more resources for the vital work that charities provide.



**Awareness is key:** Staff and volunteers are the eyes and ears of charities and will likely be the largest source of referrals of suspected fraud. It is essential that they know what fraud looks like and how they can report any concerns with confidence.



**Know what you are up against:** Fraud is an inherent risk to any organisation, and charities are no different. Therefore, it is essential for charities to understand where they are most exposed to fraud. This can only be achieved through a fraud risk assessment with support from all parts of the charity. Completing a fraud risk assessment will allow the charity to adopt a clear, strategic approach to managing the risk of fraud.



**Be proactive:** Charities must ensure they are proactive in their approach to combatting fraud. This means continually monitoring and evaluating the fraud risk landscape, and implementing strategies to deter, prevent and detect fraud. In being forward looking, charities will be agile in responding to emerging risks and will be able to develop a strong anti-fraud culture.



**Have a plan:** Identifying a fraud will be one of the most challenging and turbulent times in the life of a charity. In these moments it is important that there is clarity of vision, as the next steps following a referral are critical. A good fraud response plan sets out a clear path for actions and provides structure when it is needed most. It is also important for charities not to limit the scope of their investigation solely to the fraud in question, or to ignore root causes, as the known fraud may just be the tip of the iceberg.



## ABOUT US



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BDO is the fifth largest auditing and accounting firm in the UK and part of the global network, BDO International. We provide audit and assurance, tax, advisory and business outsourcing services to organisations across all sectors of the economy, including the charity sector.

As a firm, we are committed to the charity sector and recognise the importance of personal service delivered by charity specialists. As such, we have a dedicated team of charity sector experts across various service lines, including forensics and dispute advisory. Acting for over 600 charitable and not for profit organisations, our breadth and depth across the sector means we have a comprehensive understanding of the challenges and opportunities charities face.

In particular, our forensic and dispute advisory team has experience and expert knowledge of fraud risk management frameworks, fraud awareness training, fraud and bribery risk assessments, fraud, bribery and corruption investigations, commercial dispute resolution and expert witness services, corporate intelligence, forensic technology and data analytics.

We combine this experience and expertise with research and data to provide valuable insights, such as this report, to help charities and the wider society succeed.

[bdo.co.uk/charity-fraud](https://bdo.co.uk/charity-fraud)



Fraud Advisory Panel is the voice of the counter-fraud profession, committed to tackling fraud and financial crime.

We aim to strengthen fraud resilience by championing best practice in fraud prevention, detection and response. We do this through education, advice and research.

Our members come from a wide range of professions and sectors and are united by their determination to counter fraud.

We were founded in 1998 by ICAEW which continues to support our work.

[fraudadvisorypanel.org](https://fraudadvisorypanel.org)  
[preventcharityfraud.org.uk](https://preventcharityfraud.org.uk)

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