

EIT Anti-fraud Strategy

The EIT – Making Innovation Happen

European Institute of Innovation and Technology (EIT)

November 2015

www.eit.europa.eu



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1. General Background

On 24th June 2011, the European Commission adopted its Anti-Fraud Strategy, aiming at improving the prevention and detection of fraud, the conditions for investigations of fraud, and at achieving adequate reparation and deterrence¹¹. The European Commission has developed a Common Approach on EU decentralised agencies¹² which requires a set of Anti-Fraud measures to be put in place, with the declared aim to improve their efficiency, transparency and accountability.

As a body of the European Union, the European Institute of Innovation & Technology (EIT) “contributes to sustainable European economic growth and competitiveness by reinforcing the innovation capacity of the Member States and the Union in order to address major challenges faced by European society. It shall do this by promoting synergies and cooperation among, and integrating, higher education, research and innovation of the highest standards, including by fostering entrepreneurship”. As all other EU agencies, the EIT as per the EIT Regulation is "responsible for taking the necessary measures to provide reasonable assurance of achieving prevention and detection of fraud and irregularities."

Taking into consideration the priorities set by the Commission within the framework of the Common Approach on EU decentralised agencies, the need to pursue the Commission’s main objectives for its implementation ("more balanced governance, improved efficiency and accountability and greater coherence") and the helpful guidance provided by the European Anti-Fraud Office (OLAF)¹³, the EIT has now developed its Anti-Fraud Strategy and the related Action Plan for the years 2015-2017.

The overall objective of this document is to improve prevention, detection and the conditions for investigations of fraud, and to pursue adequate deterrence and reparation, with proportionate and dissuasive sanctions. Moreover, the Anti-Fraud Strategy and Action Plan are in line with the provision of Article 22 of Regulation EC No 294/2008 establishing the European Institute of Innovation and Technology, as amended by Regulation (EU) No 1292/2013 of the European Parliament and of the Council of 11 December 2013. This provision calls upon the EIT to combat fraud, corruption and other unlawful activities.

This Anti-Fraud Strategy is part of the EIT’s internal controls system and meets the requirements of Article 48 of the Framework Financial Regulations of the European Commission, which refers inter alia to the need of preventing and detecting irregularities¹⁴ and fraud¹⁵. It is valid for three years and will be updated in the course of its implementation - if necessary - or after its assessment, at the end of the implementation period.

¹¹ Communication from the Commission to the European Parliament, the Council, the European and Social Committee and the Committee of the Regions and the Court of Auditors on the Commission anti-fraud strategy, COM(2011)376 final, 24.6.2011, available at http://ec.europa.eu/anti_fraud/documents/preventing-fraud-documents/ec_antifraud_strategy_en.pdf

¹² Joint Statement of the European Parliament, the Council of the EU and the European Commission on decentralised agencies, available at http://europa.eu/agencies/documents/joint_statement_and_common_approach_2012_en.pdf

¹³ Joint Statement of the European Parliament, the Council of the EU and the European Commission on decentralised agencies, available at http://europa.eu/agencies/documents/joint_statement_and_common_approach_2012_en.pdf

¹⁴ Article 1(2) of Regulation No 2988/95 of 18 December 1995 on the protection of the European Communities’ financial interests (OJ L 312, 23.12.1995, p.1) defines “irregularity” as “any infringement of a provision of Community law resulting from an act or omission by an economic operator, which has, or would have, the effect of prejudicing the general budget of the Communities or budgets managed by them, either by reducing or losing revenue accruing from own resources collected directly on behalf of the Communities, or by an unjustified item of expenditure”.

¹⁵ Article 1(1) of the Convention on the protection of the European Communities’ financial interests (OJ C 316, 27.11.1995, p.48) defines “fraud” “a) in respect of expenditure, as any intentional act or omission relating to : - the use or presentation of false, incorrect or incomplete statements or documents, which has as its effect the misappropriation or wrongful retention of funds from the general budget of the European Union or budgets managed by, or on behalf of, the European Union; - non-disclosure of information in violation of a

2. The EIT context

The European Institute of Innovation & Technology contributes to Europe's sustainable growth and competitiveness by enhancing the Union's ability to innovate and as an integral part of Horizon 2020, the EU Framework Programme for Research and Innovation. It does so through the integration of higher education, research and innovation of the highest standards.

The EIT represents a change in the European innovation landscape via its Knowledge and Innovation Communities (KICs). KICs are highly autonomous and integrated partnerships which bring together leading organisations from higher education, research and business to collaborate in new ways, transcending the borders of disciplines, backgrounds, sectors and countries.

The concept and model of the EIT and its KICs are designed in a way that facilitates and actively encourages synergies and complementarities with EU, national and regional initiatives of research and innovation, entrepreneurship and higher education. The EIT acts as unique catalyst by building and integrating existing strengths and capabilities of organisations and regions that are active in the different areas of the knowledge triangle of higher education, research and innovation.

The EIT KICs bring a European dimension and integrated strategic approach to regional initiatives via their Co-location Centres. These centres offer strong local players the opportunity to closely connect and interact with other excellent partners across borders in the strategic and integrated framework of the EIT KICs. The EIT KIC themes are strategically aligned with the societal challenges of Horizon 2020 and EU policy priorities.

The EIT is financed through a contribution from the general budget of the European Union within the financial envelope from Horizon 2020 during the period from 1 January 2014 to 31 December 2020 and other private and public sources. In particular, the EIT is financed from contributions from partner organisations, forming a substantial source of funding, voluntary contributions from Member States, third countries or public authorities within them, contributions from international bodies or institutions, revenue generated by the KICs' own assets and activities and royalties from intellectual property rights, capital endowments, including those managed by the EIT Foundation, bequests, donations and contributions from individuals, institutions, foundations or any other national bodies, the contribution from the EIT and financial instruments, including those funded from the general budget of the Union.

The EIT contribution to the KICs may cover up to 100% of the total eligible costs of KIC added-value activities.

The EIT implements its budget in accordance with the principles of sound financial management (Article 317 TFEU) and with the provision of Article 325 TFEU, which stipulates that the EU, and the Member States, shall counter fraud and any other illegal activities affecting the financial interests of the Union. These articles provide an explicit legal basis for operations by the EU and its bodies and agencies to combat fraud and other unlawful activities. In this light, the EIT is committed to ensuring that the framework, the policies, the rules and the procedures in place enable the effective prevention and detection of fraud.

specific obligation, with the same effect; - the misapplication of such funds for purposes other than those for which they were originally granted: b) in respect of revenue, any intentional act or omission relation to : - the use or presentation of false, incorrect or incomplete statements or documents, which has as its effect the illegal diminution of the resources of the general budget of the European Communities or budgets managed by, or on behalf of, the European Communities, - non-disclosure of information in violation of a specific obligation, with the same effect, - misapplication of a legally obtained benefit, with the same effect".

3. Principles

Ethics and transparency are key concerns for the EIT. The EIT is fully committed to ensure that these principles are properly applied. The EIT staff, members of the Governing Board, staff working in Knowledge and Innovation Communities (KICs), external experts recruited and all external contractors must pursue the highest standards of honesty, propriety and integrity in the exercise of their duties. This also needs to be visible to the whole EIT community and our external stakeholders.

The EIT will not tolerate fraud, irregularities, impropriety or dishonesty and will report, without delay, any instance of suspected fraud to OLAF, which is exclusively competent to investigate those cases¹⁶.

The EIT will take all actions and adopt all measures as appropriate against anyone defrauding or attempting to defraud the EIT and/or stakeholders' assets and resources. In all such cases, EIT will co-operate fully with OLAF and all other EU authorities and institutions.

4. Definitions

Fraud:

Following the Commission Anti-Fraud Strategy 2011 (CAFS)¹⁷, the definition of fraud is taken from Article 1 of the Convention for the protection of the European Communities' financial interests¹⁸, in which fraud consists of:

(a) in respect of expenditure, any intentional act or omission relating to:

- the use or presentation of false, incorrect or incomplete statements or documents, which has as its effect the misappropriation or wrongful retention of funds from the general budget of the Community or budgets managed by, or on behalf of, the Community,
- non-disclosure of information in violation of a specific obligation, with the same effect,
- the misuse of such funds for purposes other than those for which they were originally granted;

(b) in respect of revenue, any intentional act or omission relating to:

- the use or presentation of false, incorrect or incomplete statements or documents, which has the effect of unlawfully reducing the resources of the general budget of the Community or budgets managed by, or on behalf of, the European Communities,

¹⁶ See Commission Decision of 28 April 1999 establishing the European Anti-Fraud office (OLAF), OJ No L 136 of 31.5.1999, p. 20, available at <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31999D0352&from=EN>.

The investigations are conducted in accordance with Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council of 11 September 2013 concerning investigations conducted by the European Anti-Fraud Office (OLAF) and repealing Regulation (EC) No 1073/1999 of the European Parliament and of the Council and Council Regulation (EurNo 1074/1999, OJ L 248, 18.9.2013, p.1.

¹⁷ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee, the Committee of Regions and the Court of Auditors on the Commission anti-fraud strategy, COM(2011)376; Communication to the Commission: Commission internal action plan for the implementation of the Commission anti-fraud strategy, SEC (2011) 787.

¹⁸ Council Act of 26 July 1995 drawing up the Convention for the protection of the European Communities' financial interests, OJ No C 316 of 27.11.95, p. 48.

- non-disclosure of information in violation of a specific obligation, with the same effect,
- misuse of a legally obtained benefit, with the same effect.

Therefore, the concept of fraud covers, in particular, but not only, any infringement of the financial interests of the EU as defined by the above mentioned Convention. It also covers misbehaviour, that may not have a direct effect on the EU's financial interests, but has anyhow a reputational impact, such as some cases of forgery (in CVs for example), concealment of material facts, security breaches of IT systems, cyber fraud and conflicts of interests that have not been declared intentionally. Favouritism and collusion are also included in the definition of fraud.

Irregularity:

The concept of irregularity is defined in the Council Regulation 2988/952 on the protection of the European Communities' financial interests. Irregularity is defined as “any infringement of a provision of Community law resulting from an act or omission by an economic operator, which has, or would have the effect of prejudicing the general budget of the Communities or budgets managed by them, either by reducing or losing revenue accruing from own resources collected directly on behalf of the Communities, or by an unjustified item of expenditure”.

It is therefore the component of intentional deceit which distinguishes fraud from irregularity.

5. Fraud risk assessment

In order to further focus on the risk of fraud, the EIT has carried out, an internal specific fraud risk assessment, in the second half of 2015, with the full participation of EIT management.

The objective of such fraud risk assessment was to document the key fraud risks, and as a result, a list of prioritised risks was produced. Out of the risks identified, the Director decided to focus on the following 4 areas of risk:

- use of EIT funds by KICs;
- conflict of interest and impartiality of assessment;
- procurement;
- recruitment.

6. Objectives and actions

The strategic objectives are driven by the EIT's priorities and values. The vast majority of EIT funds are implemented by KICs whose budget is growing whereas the EIT's operational budget is largely stable. The EIT's Governing Board has a significant decision-making power as part of the designation of KICs and annual grant allocation process. For this reason, the EIT needs to set certain objectives to counter fraud at all levels, i.e. the levels of KICs, the Governing Board, the EIT staff and external contractors and thus reinforce the public trust in our activities.

These objectives aim at encompassing all stages of the anti-fraud cycle: prevention, detection, investigation, recovery and sanction.

Since its inception the EIT has already successfully developed a number of procedures and policies designed to mitigate identified risks, including major fraud risks; these are:

- Code of Conduct for the GB and EIT staff;
- Declaration of Interest policy for GB members, EIT staff and experts.
- Completed IAC consultancy on conflict of interest risk;
- Grant management guidelines for planning, reporting and finance as well as principles of good governance;
- Recruitment procedures, audits, ex ante and ex-post controls;
- Nomination of whistleblowing, ethics and OLAF contact points;
- Annual risk assessment;
- Policy for sensitive functions;
- Other control and supervision mechanisms.

In addition to the mitigating controls already in place, further targeted actions will be needed in 2016/2017 to fulfil the objectives described in this Strategy.

In order to address the four major risks identified in the preceding section, the following strategic objectives were agreed and endorsed by the EIT Director:

1. Develop an anti-fraud culture underpinned by high level of awareness, integrity, impartiality and transparency within the EIT community;
2. Develop fraud prevention, detection, reporting, monitoring and handling capacity;
3. Improve prevention and detection of favouritism in recruitment and procurement procedures at the level of the EIT and KICs;
4. Focus effort on fraud risk mitigation in identified areas of the organisation.

Objective no. 1

Develop an anti-fraud culture underpinned by high level of awareness, integrity, impartiality and transparency within the EIT community

In the EIT's view, fraud deterrence is facilitated by wide-spread common understanding and sharing of the ethical values and relevant rules underlining any activity of the EIT.

This objective is inspired by the need to constantly communicate the rules and ethical values of the EU public service from the highest level to each member of staff, including also the use of EIT funds by KICs.

Increasing the employees' and KIC beneficiaries' education in this regard is of paramount importance for the successful implementation of this Anti-Fraud Strategy. EIT and KICs staff need to gain awareness not only of the detailed specific rules but also of the general high-level principles and objectives for guidance and motivation.

It is crucial that each member of staff knows how to exercise judgement and recognises which principles should be applied in concrete situations.

The aim of promoting these values is to reach a level of awareness whereby EIT and KIC staff should be guided by a sense of propriety and conduct at all times in a manner that can bear the closest public scrutiny.

Actions to reach objective no. 1¹⁹:

- organise initial survey on anti-fraud knowledge across EIT and KICs;
- plan regular communication to EIT staff, Governing Board members and KICs;
- design compulsory in-house training to the EIT Staff and KIC staff;
- set up a regular anti-fraud survey.

Objective no. 2

Develop fraud prevention, detection, reporting and handling capacity

This objective aims at providing effective systems and guidance in tackling improprieties and reinforcing fraud prevention across the organisation and their consistent application. The purpose of having those systems and controls in-house is to tighten potential gaps in managing financial and operational processes and to empower staff members to handle improprieties. The EIT will also cooperate with, and learn from, the experience of other organisations such as OLAF, the European Commission and other Agencies in countering internal and/or external fraud, with a view to enhancing its established controls.

¹⁹ For detailed actions, please refer to the Annex: Action Plan.

Actions to reach objective no. 2²⁰:

Develop internal anti-fraud processes and mainstream them across the EIT's planning and implementation tools;

- include fraud specific risks explicitly in the annual risk assessment exercise;
- plan targeted audits based on the current risk assessment;
- adopt a whistleblowing policy for EIT staff, KICs and external stakeholders;
- establish an Anti-Fraud coordinator with sufficient capacity;
- establishing a good working relationship/cooperation with OLAF;
- confidential quarterly reporting to the OLAF correspondent at DG EAC on OLAF cases and their follow-up;
- review access rights to all IT tools used by the EIT and analyse appropriateness of enhanced IT security monitoring for fraud detection.

Objective no. 3

Improve prevention and detection of favouritism in recruitment and procurement procedures at the level of EIT and KICs

This objective aims at ensuring that only the best candidates (in staff recruitment procedure) and contractors (in procurement procedures) will be selected to work for the EIT and KICs and that merit based (recruitment) and value for money (procurement) based selections for staff and contracts prevail. Recommendations and decisions in procedures, involving comparative evaluations, should be based only on merit, in the name of the objectivity and impartiality that the EIT applies in performing its mission.

This objective is of paramount importance, in the light of the other objectives mentioned. It is argued that only staff selected based solely on merit could ensure the level of commitment to the EIT that is essential to meet objectives 1 and 2. Staff plays a key role in implementing and fostering a 'zero tolerance' culture towards fraud and corruption.

Actions to reach objective no.3²¹:

²⁰ For detailed actions, please refer to the Annex: Action Plan.

²¹ For detailed actions, please refer to the Annex: Action Plan.

- insert anti-fraud clauses in standard contracts agreements at EIT level and make recommendations at KIC level;
- review and adjust the selection and procurement procedures at EIT and KIC level;

Objective no. 4

Focus effort on reducing residual risk level in certain areas of the organisation

This objective aims at substantiating the remaining level of risks after the current mitigating measures have been applied. The EIT would like to focus its effort on these areas to ensure the levels of risks were correctly assessed and then strengthen prevention measures where the risks scores turned out higher.

Action to reach objective no. 4²²:

- assess and review the associated systems of internal controls and procedures;

7. Roles and Responsibility

The risk of fraud has to be addressed within the overall management and control systems and anti-fraud measures are most effective when they become part of the regular processes and procedures rather than one of exercise. This means that all EIT and KIC staff should contribute and have a basic understanding of the EIT's Anti-Fraud Strategy. Moreover, some individuals and groups have specific leadership roles or responsibilities and these are identified below. The EIT will ensure that these roles and responsibilities are clearly established and communicated to all staff.

7.1. The Governing Board

The Governing Board is responsible for the adoption of this Anti-Fraud Strategy.

7.2. EIT Director

The EIT Director, with his 'tone from the top', promotes anti-fraud culture across the EIT, sets anti-fraud objectives, monitors the implementation of the strategy and action plan and puts in place effective arrangements for combating fraud.

7.3. Chief Operating Officer (COO) and heads of Unit

²² For detailed actions, please refer to the Annex: Action Plan.

COO and heads of Units are responsible for promoting the anti-fraud culture within the EIT and their Units, checking staff awareness and ensuring that all suspected or reported cases of potential fraud are immediately reported to the EIT Director without delay, cooperating with all other functions involved in the implementation of the Anti-Fraud Strategy.

7.4. Heads of sections

The 'first line controls' for the prevention and detection of fraud rests with heads of sections throughout the organisation. They have the responsibility to manage the risk of fraud and will be supported and trained so that this task is fulfilled effectively.

7.5. Anti-Fraud Coordinator

As Anti-Fraud Coordinator, the Legal Corporate Officer is responsible for identifying and preventing the risks of breach of legal provisions and ethical behaviour rules which may entail liabilities or reputational loss for the EIT. The Anti-Fraud coordinator supervises the implementation of the Anti-Fraud Strategy, follows up actions, reports to the Director and acts as a contact point for OLAF for the Strategy-related issues;

The Coordinator provides guidance on managing fraud risk and design of additional controls, develops training for all staff and communications with KICs and other stakeholders, in close collaboration with competent experts within and outside the EIT.

7.6. Head of Services and Finance (SAF)

The Head of SAF is responsible for ensuring that financial systems incorporate strong measures to reduce the risk of fraud and detect potential fraud cases at an early stage. He also contributes to promoting staff awareness about the anti-fraud principles and Strategy; where necessary proposes sanctions commensurate to the breach by the relevant staff member, as decided by the Director in accordance with the reports and recommendations drawn up following the OLAF investigation²³.

7.7. Internal Audit Capability (IAC)

The IAC is responsible to perform regular risk-based audits or ad-hoc checks and consider the potential for the occurrence of fraud, evaluate how the EIT manages fraud risk and independently report significant fraud risk exposure and control issues to the GB and EIT management.

7.8. Staff members

²³ See article 11 of Regulation No 883/2013, in particular par. 4: "Reports and recommendations drawn up following an internal investigation and any relevant related document shall be sent to the institution, body, office or agency concerned. That institution, body, office, or agency shall take such action, in particular of a disciplinary or legal nature, as the results of the internal investigation warrant, and shall report thereon to the Office, within a time-limit laid down in the recommendations accompanying the report, and, in addition, at the request of the Office".

All staff members comply with the EIT's Anti-Fraud principles and Strategy; forward any reasonable concerns with regard to fraud to their head of section, reporting officer and/or senior management, in accordance with the existing guidelines, for example, on internal whistleblowing

7.9. KIC CEOs, KIC management, KIC LE staff, KIC partners, EIT suppliers, contractors, experts and consultants

All the above comply with the EIT's Anti- Fraud principles and Strategy.

8. Review and Monitoring

The Anti-Fraud Coordinator will ensure that the EIT's approach to managing the risk of fraud is kept up to date with developments, in best practice, and legislative requirements. The Anti-Fraud Strategy will be reviewed every 3 years. The action plan will be reviewed and updated annually as part of the AWP and AAR exercises.

The implementation of the EIT's Anti-Fraud Strategy, policy and procedures will be subject to periodic review on the basis of an evaluation of the impact of the Strategy, measured using the key performance indicators developed, among which:

1. Number of files sent to OLAF for investigation.
2. Number of contracts subject to close monitoring due to an assessment of high risk of fraud.
3. Time elapsed between OLAF requests for information and date when information is provided to OLAF.
4. Time elapsed between receipt of an OLAF report and the completion of the required follow up actions such as disciplinary sanctions or recovery of funds by the EIT.

9. Annex

EIT's anti-fraud objectives and priority actions are documented in the action plan below. The achievement of the objectives is measured through a set of indicators.

Action Plan for the years 2015-2016

Action	Priority	Responsible	Deadline	Indicator
<p>Perform an initial in-house survey on anti-fraud knowledge among the EIT staff and KICs.</p>	<p>Prevention</p>	<p>Anti-Fraud Coordinator (Legal Corporate Officer) in cooperation with HR, Legal & Procurement and IAC (tbc)</p>	<p>19.10.2015</p>	<p>Outcome of the survey and feedback from the staff</p>

<p>Plan communication to the EIT staff, members of the EIT Governing Board and KICs on anti-fraud ethical matters by organising designed compulsory in-house training covering the Anti-Fraud Strategy, scope of 'fraud' and fraud prevention and detection (red flags and detection tools) to the EIT Staff and offering training to</p> <p>Perform regular survey on anti-fraud and ethics knowledge and organize further trainings according to the results.</p> <p>Monitoring any potential/actual conflict of interest situation identified at the GB level, via annual declarations and mitigation measures in place.</p>	<p>Prevention</p>	<p>Anti-Fraud Coordinator (Legal Corporate Officer) in cooperation with HR, Legal & Procurement and IAC</p>	<p>02.11.2015</p>	<p>No. of trainings organised and No. of staff participating in such training</p>
<p>Detection and prevention</p>	<p>Anti-Fraud Coordinator (Legal Corporate Officer) in cooperation with HR, Legal & Procurement and IAC</p>	<p>10.09.2016</p>	<p>No of replies and feedback of the survey</p>	

<p>Develop internal anti-fraud processes on how to report and tackle alleged fraud instances and mainstream them across the EIT's planning and implementation tools.</p>	<p>Prevention/Detection</p>	<p>Anti-Fraud Coordinator (Legal Cooperation Officer) in cooperation with HR, Legal & Procurement and Grant assurance</p>	<p>15.02.2016</p>	<p>Procedure in place</p>
<p>Carry out annual, fraud specific risk assessment and update the list of measures taking into account fraud trends in the EU context and integrate them in the Annual Work Programme (AWP) as appropriate.</p>	<p>Detection</p>	<p>Quality assurance and coordination officer with Anti-Fraud Coordinator (the Legal Corporate Officer)</p>	<p>30.11.2016</p>	<p>Fraud risk assessment included and list updated and AWP</p>

<p>Develop a risk based audit plan considering the probability of fraud. Evaluate the potential for the occurrence of fraud and how the EIT manages fraud risk. Report significant risks and control issues.</p>	<p>Detection</p>	<p>IAC</p>	<p>continuous</p>	<p>IAC audit planning and reporting</p>
<p>Drafting and adoption of a whistleblowing policy for EIT staff, KICs and external stakeholders. Analyse and follow up on the codes of conduct presented by KICs under the new obligatory principles of good governance.</p>	<p>Detection</p>	<p>HR with the Anti-Fraud coordinator (Legal Corporate Officer)</p>	<p>15.05.2016</p>	<p>Document adopted</p>
<p>Establish an Anti-Fraud coordinator</p>	<p>Prevention/Detection</p>	<p>EIT Director</p>	<p>30.10.2015</p>	<p>Contact point(s) identified and communicated to all staff</p>

<p>Establishing a good working relationship/cooperation with OLAF ensuring the follow-up, assessment and implementation of OLAF's recommendations in OLAF's Final Cases Reports, monitoring and reporting back to OLAF</p>	<p>Investigation</p>	<p>EIT Director/Anti-Fraud coordinator (Legal Corporate Officer)</p>	<p>31.12.2015</p>	<p>Bi-lateral meeting organised</p>
<p>Review access rights to all IT tools used by the EIT and analyze appropriateness of enhanced IT security monitoring for fraud detection</p>	<p>Detection/ Investigation</p>	<p>Infrastructure & IT and Data Protection Officer</p>	<p>27.06.2016</p>	<p>Documented review and analyse undertaken</p>
<p>Insert anti-fraud clauses (suspension of payments, damages, etc.) in standard contracts agreements at the EIT and KIC level used for procurements, purchases, etc. and develop a complaint procedure for procurement.</p>	<p>Prevention</p>	<p>Legal & Procurement with Anti-Fraud coordinator (the Legal Corporate Officer)</p>	<p>05.02.2016</p>	<p>Clauses inserted and procedure adopted</p>

Assess if selection and procurement procedures at EIT and KIC level demonstrate sufficient fraud resistance and address the gaps identified in the process.	Detection/ Investigation	Anti-Fraud coordinator (Legal Corporate Officer) with HR and Legal & Procurement	26.05.2016	Assessment documented
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