ACTION PLAN-Bi-annual Review 2018\(^1\), (B2) including progress and proposals for improvement

This action plan designed to implement the Anti-Fraud Strategy of the S2R JU covers the period from October 2017 till end of 2020. The target dates are geared to the level of priority. When implementing the actions, the S2R JU will take as much as possible advantage of synergies through cooperating with other Union institutions and bodies, starting with other JUs and overall H2020 family.

The actions will cover the stages of the anti-fraud cycle: prevention, detection, investigation and corrective measures.

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<tr>
<th>Operational objective</th>
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<tbody>
<tr>
<td>1. Maintain a culture of integrity and Build capacities through training and guidance for S2R JU staff</td>
<td>Ensure an ethical and anti-fraud ‘tone at the top': ensure management regularly conveys messages on ethics and fraud prevention to staff</td>
<td>S2R JU ED and Management</td>
<td>Constant monitoring – regular communication in weekly team meetings, amongst which key information messages following</td>
<td>Number of messages conveyed by management to staff on ethics and fraud prevention</td>
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\(^1\) The current Commission’s Anti-Fraud Strategy (CAFS) states that “risk analysis tools [...] need to be reviewed regularly in order better to address these issues”. Taking into consideration the S2R anti-fraud strategic objectives announced in its Anti-fraud strategy 2017-2020 and in order to avoid unnecessary administrative burden, the S2R JU Anti-Fraud Strategy’s Action Plan will be revised in an bi-annual basis instead of in a quarterly-annual basis.
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<td>After a fraud case is closed, set up a debriefing with S2R JU staff on best practices concerning prevention, detection and recovery</td>
<td></td>
<td>S2R JU ED and Management</td>
<td>Ad hoc, when required</td>
<td>Number of debriefing sessions with S2R JU staff on best practices after a fraud case is closed</td>
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<td>Continue to raise awareness and systematic focus on ethics at governance bodies of the S2R JU</td>
<td></td>
<td>S2R JU ED and Management</td>
<td>Ad hoc, when required</td>
<td>Number of ethics awareness raising actions targeted at the governance bodies of the S2R JU</td>
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<td>Implement indicators regarding Fraud into Annual Activity reporting</td>
<td></td>
<td>S2R JU ED and Management</td>
<td>Each year once when applicable, Q2</td>
<td>Indicators to be mentioned in the AAR 2017 – is included in a new chapter 4.7 of AAR</td>
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<td>Include links to OLAF homepage and anti-fraud documentation on S2R JU Web page under the tab “functioning of the JU”</td>
<td></td>
<td>HoAF</td>
<td>Q4 2017- Done</td>
<td>Publication of the links on the S2R JU Website</td>
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<td><strong>Training</strong> Provide a training session to all S2R JU staff on fraud prevention</td>
<td></td>
<td>HoAF</td>
<td>Q2 2017 – done – new training on ethics and integrity (also covers fraud prevention info session to staff) is planned in Q4 2018</td>
<td>Number of staff members that attended the S2R JU training on ethics and fraud prevention</td>
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<td>Organise a S2R JU training on ethics</td>
<td></td>
<td>HoAF</td>
<td>Q2 2017 – done – new training on ethics and integrity is planned in Q4 2018</td>
<td>Number of staff members that attended the S2R JU training on ethics and fraud prevention</td>
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<td>HR issues: - Whistleblowing - Anti harassment</td>
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<td>- Anti-harassment: GB Decision 09/2017 adopted(^2) - Whistleblowing: GB decision to be adopted in Q4 2018</td>
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<td><strong>Guidance</strong> Communicate practical guidance to S2R JU staff on red flags, whistleblowing, how to react and how to report fraud and ensure this guidance is easy accessible (Availability of prospects in lobby, welcome pack and shared on the S2R JU website and by e-mail</td>
<td>HoAF and Management</td>
<td>Q2 2017 – done Q4 2018 – new documentation may be available following the ethics and integrity training planned in Q4 2018.</td>
<td>Presence of practical guidance for S2R JU staff on red flags, how to react when they come across a potential case, how to report fraud and Possible administrative and financial sanctions and number of staff participating in OLAF &amp; DP Workshops</td>
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<td>Draw up concise guidance for S2R JU staff on possible administrative and financial penalties that can be taken in cases of misconduct, irregularities and fraud</td>
<td>Priority</td>
<td>HoAF and Management</td>
<td>Q2 2017 – done. New training on ethics and integrity is planned in Q4 2018</td>
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<td>2. Ensure a high level of reactivity</td>
<td>Prevention/Detection/Investigation/Corrective measures</td>
<td>S2R JU ED and Management</td>
<td>Q2 2018 - new S2R Legal Officer has been appointed</td>
<td>ED letter of Nomination of contact person with OLAF</td>
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<td>Appoint a ‘person of confidence’ competent and available to guide S2R JU staff in the area of fraud (and advertise this)</td>
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<td>Ensure swift transmission of key information to OLAF and full cooperation during a possible investigation and make sure that precautionary, protective and recovery measures are initiated as soon as possible</td>
<td></td>
<td>Ad hoc, when required</td>
<td>Time elapsed between OLAF requests for information and date when information is provided to OLAF</td>
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<td>New Commission Anti-Fraud Strategy (CAFS 2) adoption is delayed. Follow-up of potential actions to be taken when applicable to S2R JU.</td>
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<td>Whenever the CAFS 2 is adopted.</td>
<td>Ensure implementation of CAFS 2 when adopted and assess the impact on the JU Anti-Fraud Strategy</td>
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<td>3. Prevent data leakage</td>
<td>Ensure awareness of S2R JU staff on management and access of restricted, sensitive and personal data</td>
<td>Legal Officer</td>
<td>Q2 2017 – done. Q4 2018 – Information on Data Protection</td>
<td>Number of awareness raising actions regarding access to data and organisation of DP</td>
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<td>Define and implement a process of access right management (Financial Systems)</td>
<td></td>
<td>HoAF with the support of LISO</td>
<td>Constant monitoring – Access rights to ABAC financial system is conditioned by the approval of the ED or the HoAF. Annual independent review of ABAC security periodic validation (with DG BUDGET) – done in May 2017. By analogy to apply the same to other systems.</td>
<td>Number of Access rights granted and periodic report on ABAC security</td>
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<td>Ensure the effective implementation of physical security measures regarding storage of sensitive</td>
<td></td>
<td>HoAF, DPO (LO), LISO, HR Officer,</td>
<td>Ongoing – Q4 2018 – List of Availability of secure locked cupboards for staff</td>
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<td>data</td>
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<td>all S2R JU staff</td>
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<td>dealing with sensitive data and bags or bucks for destruction of large quantities of sensitive documents.</td>
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processing operations requiring secure locked cupboards for hard copies established – to be confirmed together with external lawyer firm – message addressed to staff for awareness and ensure effective implementation