



Shift2Rail Anti Fraud Strategy 2017-2020

ACTION PLAN- First Bi-annual Review 2019 (B1)¹, 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. As regards the H2020 family, a Common Anti-Fraud Strategy in the Research Family has been adopted in March 2019 but the Action Plan need to be revised in order to implement the new [European Commission Common Anti-Fraud Strategy](#) (CAFS) that was adopted in April 2019². DG MOVE/ENER revised Anti-Fraud Strategy is not available for the S2R JU yet.

The actions will cover the stages of the anti-fraud cycle³: prevention, detection, investigation and corrective measures.

¹ The [2011 Commission's Anti-Fraud Strategy \(CAFS\)](#) stated 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 a bi-annual basis. In the EC revised 2019 Commission's Anti-Fraud Strategy, no mention to mandatory regular updates are mentioned, only that the "*EC Corporate Management Board will, on an annual basis, discuss and review the Commission's anti-fraud policies*",

² https://ec.europa.eu/anti-fraud/policy/preventing-fraud_en

³ Same stages included in the revised CAFS

Operational objective	Priority	Unit in charge	Deadline	Indicator
1. Maintain a culture of integrity and Build capacities through training and guidance for S2R JU staff	Ensure an ethical and anti-fraud 'tone at the top': ensure management regularly conveys messages on ethics and fraud prevention to staff	S2R JU ED and Management	Constant monitoring – regular communication in weekly team meetings, amongst which key information messages following participation to FAIR committee (LO)	Number of messages conveyed by management to staff on ethics and fraud prevention
	After a fraud case is closed, set up a debriefing with S2R JU staff on best practices concerning prevention, detection and recovery	S2R JU ED and Management	Ad hoc, when required	Number of debriefing sessions with S2R JU staff on best practices after a fraud case is closed
	Continue to raise awareness and systematic focus on ethics at governance bodies of the S2R JU	S2R JU ED and Management	Ad hoc, when required	Number of ethics awareness raising actions targeted at the governance bodies of the S2R JU
	Implement indicators regarding Fraud into Annual Activity reporting	S2R JU ED and Management	Each year once when applicable, Q2	2018 indicators mentioned in the AAR 2018 (adopted by Governing Board decision 03/2019) which included a new chapter 4.7 on Anti-Fraud Implementation and Indicators
	Include links to OLAF homepage and anti-fraud documentation on S2R JU Web page under the	HoAF	Q4 2017- Done	Publication of the links on the S2R JU Website, which include

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	tab “functioning of the JU”			the updated link to the 2019 EC Common Anti-Fraud Strategy
	Training Provide a training session to all S2R JU staff on fraud prevention	HoAF	New training on ethics and integrity (also covering fraud prevention info session to staff) organised in Q3 2019	Number of staff members that attended the S2R JU training on ethics and fraud prevention
	Organise a S2R JU training on ethics	HoAF	New training on ethics and integrity organised in Q3 2019	Number of staff members that attended the S2R JU training on ethics and fraud prevention
	HR issues: - Whistleblowing - Anti harassment			- Anti-harassment: GB Decision 09/2017 adopted in Q4 2017 ⁴ - Whistleblowing: GB decision 20/2018 adopted in Q4 2018 ⁵

⁴ https://shift2rail.org/wp-content/uploads/2017/12/Decision-9_2017-on-prevention-of-harassment.pdf

⁵ https://shift2rail.org/wp-content/uploads/2018/12/Decision-GB-20_2018_Whistleblowing.pdf

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	<p>Guidance 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)</p>	HoAF and Management	New documentation available following the ethics and integrity training organised in Q3 2019.	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 & DP Workshops
	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	HoAF and Management	New training on ethics and integrity organised in Q3 2019	
2. Ensure a high level of reactivity	<p>Prevention/Detection/Investigation/Corrective measures Appoint a ‘person of confidence’ competent and available to guide S2R JU staff in the area of fraud (and advertise this)</p>	S2R JU ED and Management	Q2 2018 - new S2R Legal Officer has been appointed as “person of confidence”	ED letter of Nomination of contact person with OLAF
	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	S2R JU ED and Management	Ad hoc, when required	Time elapsed between OLAF requests for information and date when information is provided to OLAF
	New EC Anti-Fraud Strategy (CAFS) was adopted	HoAF and Legal	Q4 2019	Ensure implementation of new

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	in April 2019 and a revised common anti-fraud strategy and action plan in the Research Family (R&I) in March 2019. The R&I Action Plan may still need to be revised in order to implement the revised CAFS. DG MOVE/ENER revised Anti-Fraud Strategy is still on-going. Follow-up of potential actions to be taken when applicable to S2R JU.	Officer		CAFS as well as new recommendations included in the R&I and in DG MOVE/ENER Action Plans when revised. Assess the impact on the JU Anti-Fraud Strategy and revise it if needed
3. Prevent data leakage	Ensure awareness of S2R JU staff on management and access of restricted, sensitive and personal data	Legal Officer	Q1 2019 – Information on EU Data Protection Regulation (following new regulation in place) has been communicated by S2R DPO to JU staff. A more in deep training will be organised by S2R DPO in Q3 2019	Number of awareness raising actions regarding access to data and organisation of DP Workshop with EDPS as well as adoption of DP related recommended processes and procedures
	Define and implement a process of access right management (Financial Systems)	HoAF with the support of LISO	Constant monitoring – Access rights to ABAC financial system is	Number of Access rights granted and periodic report on ABAC security. New SPOC function (main and back-up) communicated to RTD helpdesk

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			<p>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.</p>	<p>service. ED formal decision on new LISO and SPOC will be adopted in Q3 2019</p>
	<p>Ensure the effective implementation of physical security measures regarding storage of sensitive data</p>	<p>HoAF, DPO (LO), LISO, HR Officer, all S2R JU staff</p>	<p>Q4 2018 – List of processing operations requiring secure locked cupboards for hard copies established and published in the S2R JU central data protection</p>	<p>Availability of secure locked cupboards for staff dealing with sensitive data and bags or bucks for destruction of large quantities of sensitive documents.</p>

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			register as per the new EU Data Protection Regulation Q3 2019- Message addressed to staff for awareness and ensure effective implementation will be communicated during the data protection training	