

ACTION PLAN-Bi-annual Review 2018¹, (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.

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	Number of messages conveyed by management to staff on ethics and fraud prevention

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.

Operational objective	Priority	Unit in charge	Deadline	Indicator
			participation to FAIR committee (LO)	
	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	Indicators to be mentioned in the AAR 2017 – is included in a new chapter 4.7 of AAR
	Include links to OLAF homepage and anti-fraud documentation on S2R JU Web page under the tab “functioning of the JU”	HoAF	Q4 2017- Done	Publication of the links on the S2R JU Website
	<p>Training Provide a training session to all S2R JU staff on fraud prevention</p>	HoAF	Q2 2017 – done – new training on ethics and integrity (also covers fraud prevention info session to staff) is planned in Q4 2018	Number of staff members that attended the S2R JU training on ethics and fraud prevention

Operational objective	Priority	Unit in charge	Deadline	Indicator
	Organise a S2R JU training on ethics	HoAF	Q2 2017 – done – new training on ethics and integrity is planned in Q4 2018	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 ² - Whistleblowing: GB decision to be adopted in Q4 2018
	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	HoAF and Management	Q2 2017 – done Q4 2018 – new documentation may be available following the ethics and integrity training planned in Q4 2018.	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

² https://shift2rail.org/wp-content/uploads/2017/12/Decision-9_2017-on-prevention-of-harassment.pdf

Operational objective	Priority	Unit in charge	Deadline	Indicator
	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	Q2 2017 – done. New training on ethics and integrity is planned in Q4 2018	
2. Ensure a high level of reactivity	<i>Prevention/Detection/Investigation/Corrective measures</i> Appoint a ‘person of confidence’ competent and available to guide S2R JU staff in the area of fraud (and advertise this)	S2R JU ED and Management	Q2 2018 - new S2R Legal Officer has been appointed	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 Commission Anti-Fraud Strategy (CAFS 2) adoption is delayed. Follow-up of potential actions to be taken when applicable to S2R JU.	HoAF and Legal Officer	Whenever the CAFS 2 is adopted.	Ensure implementation of CAFS 2 when adopted and assess the impact on the JU Anti-Fraud Strategy
3. Prevent data leakage	Ensure awareness of S2R JU staff on management and access of restricted, sensitive and personal data	Legal Officer	Q2 2017 – done. Q4 2018 – Information on Data Protection	Number of awareness raising actions regarding access to data and organisation of DP

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			(following new regulation in place) will be communicated from external lawyer firm to JU staff.	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 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.	Number of Access rights granted and periodic report on ABAC security
	Ensure the effective implementation of physical security measures regarding storage of sensitive	HoAF, DPO (LO), LISO, HR Officer,	Ongoing – Q4 2018 – List of	Availability of secure locked cupboards for staff

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	data	all S2R JU staff	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	dealing with sensitive data and bags or bucks for destruction of large quantities of sensitive documents.