



Shift2Rail Anti Fraud Strategy 2017-2020

ACTION PLAN- Second Bi-annual Review 2019 (BA2), 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 may need to be revised in order to implement the new [European Commission Common Anti-Fraud Strategy](#) (CAFS) that was adopted in April 2019¹. DG MOVE/ENER revised Anti-Fraud Strategy is still ongoing.

The actions will cover the stages of the anti-fraud cycle²: prevention, detection, investigation and corrective measures.

Operational objective	Priority	Unit in charge	Deadline	Status (12/2019)	Indicator
1. Maintain a	Ensure an ethical and anti-fraud	S2R JU ED and	Constant monitoring	Continuous activity; FAIR	Number of messages

¹ https://ec.europa.eu/anti-fraud/policy/preventing-fraud_en

² Same stages included in the revised CAFS

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culture of integrity and Build capacities through training and guidance for S2R JU staff	'tone at the top': ensure management regularly conveys messages on ethics and fraud prevention to staff	Management	– regular communication in weekly team meetings, amongst which key information messages following participation to FAIR committee (LO)	meetings attended.	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	No case in reporting period	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	New financial rules will enter into force on 01/01/2020 which extend the conflict of interest rules to S2R JU governing board members and states that S2R JU bodies should present a strategy to avoid conflicts of interest as part of the S2R JU annual work plan.	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	Ongoing, AAR 2019 to report on anti-fraud implementation and indicators (chapter 4.7)	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	HoAF	Q4 2017	Action completed.	Publication of the links on

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	and anti-fraud documentation on S2R JU Web page under the tab “functioning of the JU”				the S2R JU Website, which include 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	Training organised on a regular basis according to needs (newcomers). Cf. also next field regarding training on ethics and integrity.	Number of staff members that attended the S2R JU training on fraud prevention
	Training on fraud awareness/red flags throughout the project lifecycle	ICC	Follow up with RTD – Q2/3 2020	To be considered for 2020/21	Number staff members that participate in training.
	Provide training on ethics and integrity	HoAF	New training on ethics and integrity organised in Q3 2019	A model decision for agencies/JU will be prepared by DGHR on administrative inquiries and disciplinary procedures. Not yet ready for adoption. Each newcomer follows a training on Ethics and Integrity at entry to service; and we also had in 2019 an in-house training given by an external consultant for all the staff.	Number of staff members that attended the S2R JU training on ethics and integrity
	HR issues:	HR/HoAF	Mediation training for	2 Trainings on prevention	- Anti-harassment: GB

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	<ul style="list-style-type: none"> - Whistleblowing - Anti harassment 		managers 2019	<p>of psychological and sexual harassment provided in 2019 (Q1 and Q2)</p> <p>Mediation training for managers planned for Q2 2020 (April)</p> <p>Establishment of Confidential Counsellors during 2019. (leaflet, manual of procedures, appointment of anti-harassment coordinator); information provided to S2R staff regularly (Ares(2019)3500910)</p>	<p>Decision 09/2017 adopted in Q4 2017³</p> <ul style="list-style-type: none"> - Whistleblowing: GB decision 20/2018 adopted in Q4 2018⁴ - Number of staff or managers trained.

³ https://shift2rail.org/wp-content/uploads/2017/12/Decision-9_2017-on-prevention-of-harassment.pdf

⁴ https://shift2rail.org/wp-content/uploads/2018/12/Decision-GB-20_2018_Whistleblowing.pdf

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	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 easily accessible (Availability of prospects in lobby, welcome pack and shared on the S2R JU website and by e-mail	HoAF and Management	New documentation available following the ethics and integrity training organised in Q3 2019.	No new training organised.	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	To be planned for 2020.	
2. Ensure a high level of reactivity	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)	S2R JU ED and Management	Q2 2018 - new S2R Legal Officer has been appointed as "person of confidence"	Action completed.	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	No case in reporting period	Time elapsed between OLAF requests for information and date when information is provided to OLAF
	New EC Anti-Fraud Strategy (CAFS) was adopted in April 2019	HoAF and Legal Officer	Q2-3 2020	DG MOVE/ENER anti-fraud strategy is still	Ensure implementation of new CAFS as well as new

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	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.			being revised. Once updates available from DG MOVE / DG RTD, these will be reviewed as part of this action plan. Planned for Q 2-3 2020.	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 the new EU Data Protection Regulation 2018/1725 has been communicated by S2R DPO to JU staff. A more in depth training will be organised by S2R DPO in Q1 2020.	The S2R DPO- attended in Q3 the 45th DPOs-EDPS meeting and informed S2R JU management on the main conclusions adopted. The S2R DPO continued to inform relevant staff (i.e.: HR, IT, communication) on key issues related to the implementation of the Regulation 2018/1725 and to improve the information provided to data subjects (i.e.: revised S2R JU Data protection & legal notices).	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 conditioned by the	ED-19-06 formal decision on news LISO and SPOC (Ares(2019)7023010)	Number of Access rights granted and periodic report on ABAC security. New SPOC function (main

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			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.		and back-up) communicated to RTD helpdesk service. ED formal decision on new LISO and SPOC will be adopted in Q3 2019
	Ensure the effective implementation of physical security measures regarding storage of sensitive data	HoAF, DPO (LO), LISO, HR Officer, all S2R JU staff	Q4 2018 – List of processing operations requiring secure locked cupboards for hard copies established and published in the S2R JU central data protection register as per the new EU Data Protection Regulation. Q1-Q4 2020 as soon as a revised S2R policy on destruction of confidential documents is adopted, message will be address to staff for awareness and ensure effective implementation.	New procedure for the destruction of confidential documents has been adopted by the European Commission (i.e.: replacement of yellow bags by closed containers of 240 litres). S2R has contracted IOB in order to assess whether this new policy is adapted to S2R JU needs.	Availability of secure locked cupboards for staff dealing with sensitive data and bags or bucks for destruction of large quantities of sensitive documents.