

Online Meeting on Anti-fraud

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INTERact



Initial Investigation Report for Complaints

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Greek Ministry for Development & Investment**

Investigation

TACKLING FRAUD THREATS

ANTI-FRAUD COLLABORATION

To tackle fraud threats all actors involved into the Programme Management (i.e. MA/JS, NAs, FLC systems, CA, AA) need to work in collaboration.

The **Managing Authority (MA) of ETCPs** has the responsibility for:

- establishing an effective Anti-fraud Strategy
- managing the fraud risk and corruption

The Anti-fraud strategy describes:

- Procedures for preventing, detecting and deterring fraud and corruption
- Taking action where fraud is suspected or detected

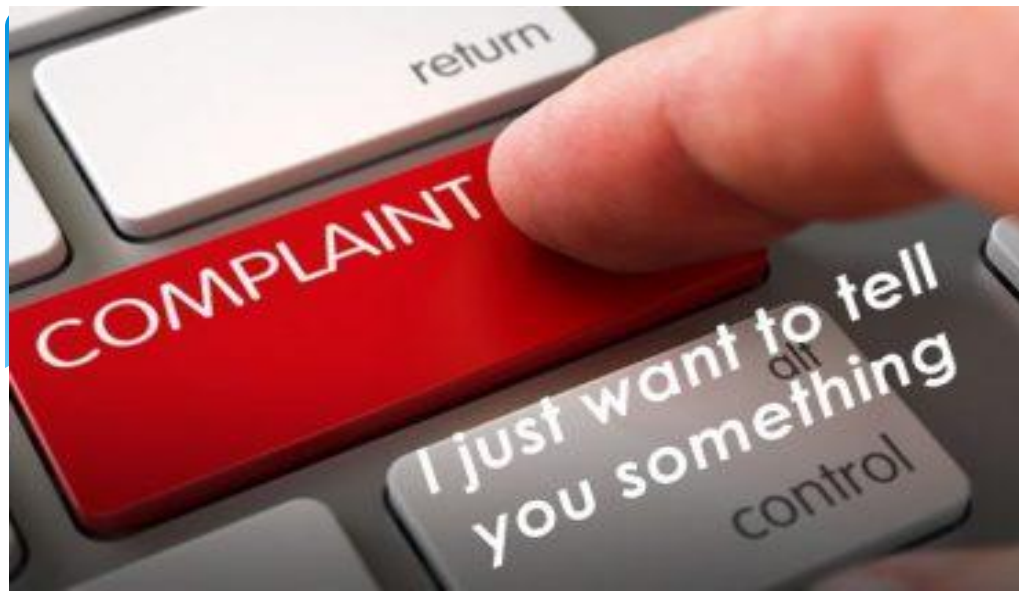
TREATING CONCERNS – REPORTS - COMPLAINTS

In the context of the MA's responsibilities, ethical culture and internal procedures

➤ the **Initial Investigation Report for Complaints** has been created in order to treat “**cases**” of concerns, reports and complaints within the Monitoring and Control System, submitted by any interested party.

The responsible Unit to perform this task is Unit A of the MA.





RECEPTION AND EXAMINATION OF CONCERNS

- ☐ Any person inside or outside the Programme structures (i.e. potential beneficiaries) may raise a concern or report suspected fraud or irregularity to the Management structures
- ☐ When a concern/report/complaint is received, an initial assessment of the “**case**” is performed by Unit A
- ☐ All cases are treated with **confidentiality**

(1) Initial Investigation Report (IIR) ...



... as an MA Tool for:

- Analyzing and understanding the elements of the submitted “case”
- Standardizing an internal communication between the Unit A of the MA, which is responsible for fraud and the Head of the Managing Authority

to be continued

(2) Initial Investigation Report (IIR) ...



... as an MA Process for response via:

- conducting an (initial) **administrative** investigation related to a reported “case”
- decoding the content of a “case”
- treating all cases with a single approach in order to reach comparable analysis and conclusions
- highlighting the potential need for further investigation by the relevant control/audit/ judicial bodies as appropriate

Template of the Initial Investigation Report

Serial Number of Complaint: □		
A. Background □		
1. ✕	The complaint was submitted via (e.g. e-mail, hard copy, etc. and date) ✕	✕
2. ✕	The complaint was submitted □	<input type="checkbox"/> by a Natural Person -- Contact Details: ¶ • Name/Surname: ¶ • Address: ¶ ¶ • Telephone: ¶ • E-mail: ¶ <input type="checkbox"/> by a Legal Person: ¶ • Name of the entity: ¶ • Name/Surname of signatory: ¶ • Address: ¶ ¶ • Telephone: ¶ E-mail: ¶ <input type="checkbox"/> Anonymously □
3. ✕	The complaint is related to ¶ (brief summary) ✕	✕

A. Background: This section provides information on:

1. how (which way) a complaint was submitted (e.g. email)
2. who submitted the complaint (i.e. natural / legal person or anonymously)
3. what the complaint is about (summary of the content)

Template of the Initial Investigation Report

B. Investigation		
1.	Analysis of the content of the complaint <i>(precise subject of the complaint e.g. actions/projects, natural persons, entities etc, and evidence provided)</i>	1. 2. 3.
2.	Submission of additional data requested from	<input type="checkbox"/> The Complainant <input type="checkbox"/> the Unit ... of the MA and/or the JS <input type="checkbox"/> Other (<i>specify</i>): <input type="checkbox"/> Not requested
3.	Data taken into consideration <i>(detailed reference)</i>	1. 2. 3.

B. Investigation: This section provides information on:

1. the content of the complaint (i.e. analysis, precise subject, evidence)
2. potential submission of additional data in order to further clarify different parameters (data requested from the complainant, the unit / JS, etc.)
3. data taken into consideration (detailed reference)

Template of the Initial Investigation Report

C. Conclusion		
Within the framework of the initial investigation by the Unit A', the following were concluded:		
1. The complaint is	<input type="checkbox"/> Well founded (<i>explain</i>)	<input type="checkbox"/> Unfounded (<i>explain</i>)
2. Further investigation of the complaint	<input type="checkbox"/> Further investigation of the complaint is required and suggested as follows:	<input type="checkbox"/> Is not required
Comments		

C. Conclusion: This section provides information on whether:

1. the complaint is well founded (fraud suspicion can be confirmed) or unfounded (fraud suspicion cannot be confirmed). Relevant explanations are presented that lead to the safest possible conclusions

2. further investigation is required or not, including suggestions for the type of investigation (e.g. an on-the-spot check by the FLC and the appropriate control / audit / judicial body)

Comments may be included on the bodies to be informed (i.e. FLC, Audit, AFCOS) and any other suggestions that may considered useful

Template of the Initial Investigation Report

D.-Attachments		
1.		
2.		
3.		
Unit-A'-Officer/s		
Date		
Name(s)/Surname(s) and		
Signature(s)		
The-Head-of-Unit-A'		
Date		
Name/Surname		
Signature		

D. Attachments: This section provides information on the available material (i.e. email sent with the relevant complaint, documents, photos, etc.). Attachments are usually available upon request.

➤ *The reference on attachments is followed by the names of the two officers who participate in the initial investigation, one of whom is a legal officer, as well as the name of the Head of Unit A.*

Thank you!

Symela A. Pasalidou

**Unit A - Managing Authority of ETCPs
Ministry of Development and Investment**