

INTERACT and Hellenic Managing Authority of ETC Programmes

W E B I N A R “A N T I – F R A U D M E E T I N G”

ANTI-FRAUD STRATEGY of the INTERREG PROGRAMMES MANAGED by GREECE: A harmonised approach for “EL-BU”, “EL-CY”, “EL-IT”, “EL-AL”, “EL-RNM” and “BalkanMed” 2014-2020

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Management and Control Systems (MCS):

Introduction

- An INTERREG Programme MCS is **designed and implemented** by:
 - ✓ the Managing Authority (co-ordination) and
 - ✓ the responsible Programme Authorities and
 - ✓ National Authorities.

- **Basis for an INTERREG MCS** elaboration:
 - ✓ Shared Management (MA – EC) and
 - ✓ Common Procedures (Cooperating Countries)

Management and Control Systems:

Overview

An MCS content

For all Authorities/bodies which undertake responsibilities in management, certification, control/audit and coordination, according to Regulation (EU) 1303/2013:

- organizational structure and responsibilities,
- operational correlation and compliance to the principle of separation of responsibilities,
- procedures applied within the MCS operation and implementation
- all relevant regulatory actions for designation of Authorities and Cooperation Programme implementation

Operational Correlation of bodies of an MCS

An Example (1):

The INTERREG V/A CBC Programme “Greece-Italy” 2014-2020

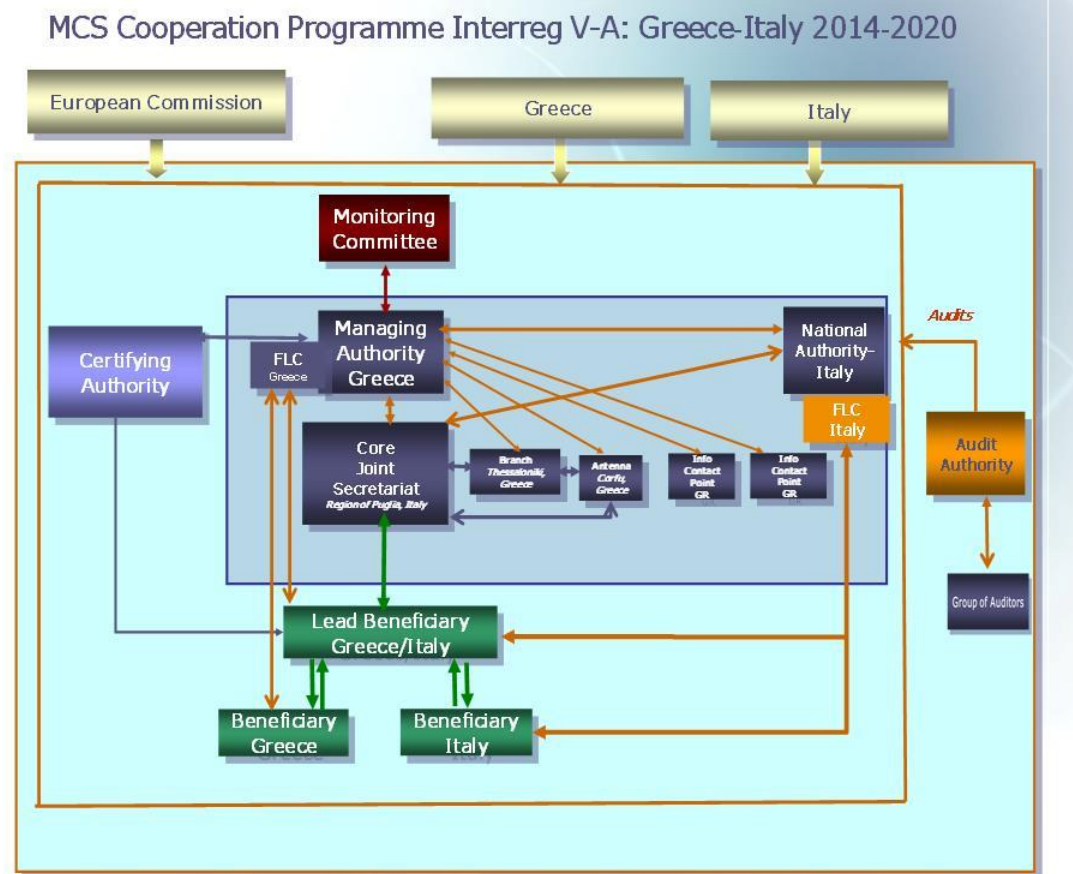


Figure 2. Operational Correlation of the Entities that are engaged in the MCS of “Interreg V-A Greece - Italy 2014 - 2020”

Operational Correlation of bodies of an MCS

An Example (2):

The INTERREG V/B TN Programme "Balkan-Mediterranean" ("BalkanMed") 2014-2020

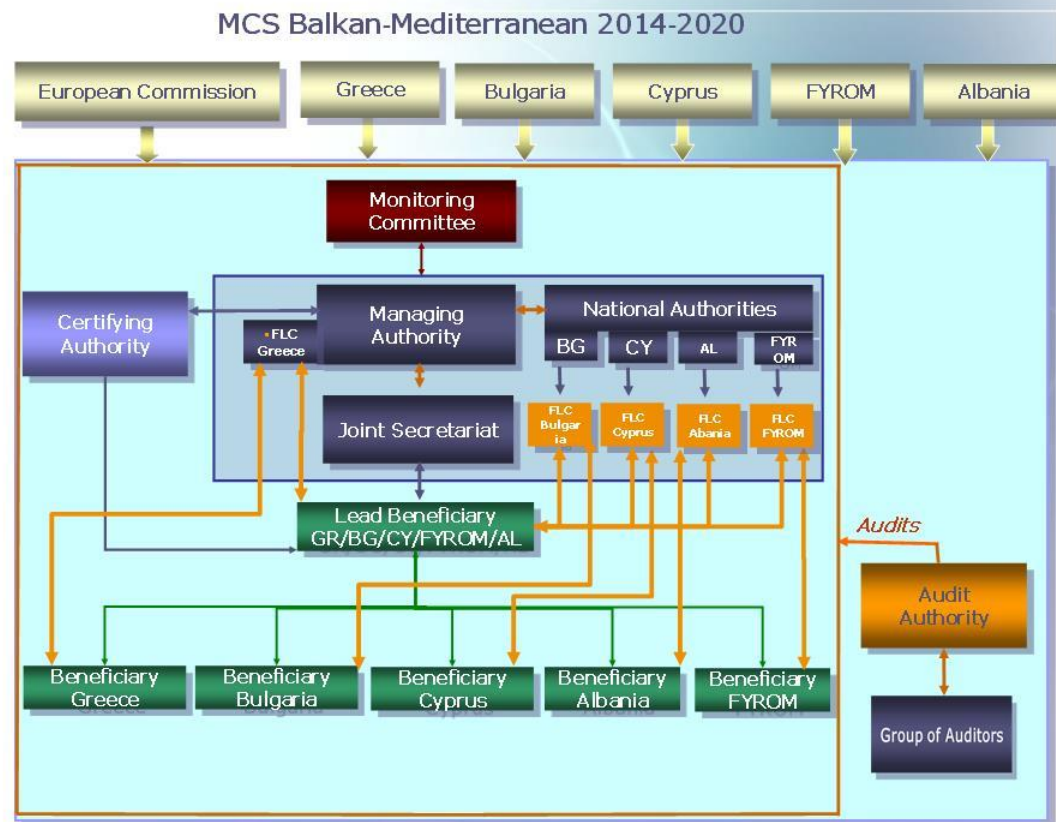


Figure 2. Operational Correlation of the Entities that are engaged in the MCS of "Interreg V-B Balkan Mediterranean 2014-2020"

MCS Description:

- The MCS Descriptive Table, based on Reg. (EU) 1303/2013 requirements

And

- 13 Annexes (i.e. thematic chapters):
 - 1_MCS
 - 2_MA
 - 3_JS
 - **4_Fraud Risk Management (incl. Overall Risk assessment and management)**
 - 5_MC
 - 6_MIS
 - 7_Procedures and Documents
 - 8_First Level Control (FLC)
 - 9_Management Declaration, etc.
 - 10_Annual/Final Reports, etc.
 - 11_Staff training & Audit Trail
 - 12_Financial Corrections
 - 13_CA

Structure and Content

Annex 4:

Risk Assessment and Management

Two (2) distinct procedures:

- Risk Assessment
- **Fraud (Risk) Management (incl. assessment)**

Based on:

Programme Strategy for Fraud
treatment (i.e. prevention and fight)

Which provides for:

- ✓ Programme Level:
"Fraud Risk Assessment Tool"
- ✓ Project Level:
"Initial Investigation Report"

Anti-Fraud Strategy

(1)

- Defines **the Programme's Commitment** on prevention, diagnosis and restraining/stopping fraud and corruption as well as undertaking actions wherever there is fraud suspicion or diagnosis.
- Organized **around 4 thematic axis (i.e. The Anti-Fraud Cycle)**:
 - prevention,
 - detection,
 - investigation and prosecution and
 - correction

Anti-Fraud Strategy

(2)

“To Whom it may Concern”

All programme/project actors, i.e.:

- The MA
- The JS
- The FLC Systems
of the cooperating countries
- The Beneficiaries
- The relevant (national) Authorities
-

Anti-Fraud Strategy (3)

The Rules – the Starting Point

- The EU Treaty
- The Financial Regulation (966/2012)
- The Common Regulation (1303/2013)
- The ETC Regulation (1299/2013),
- The EGESIF Guidance
-

Anti-Fraud Strategy

(4)

Basic Concepts and Terminology

Irregularity – Intention – Fraud

- **Fraud Suspicion**
- **Collusive bidding**
- **Conflict of Interest**
- **Corruption**
- **Bribes and Kickbacks**
- **Forgery**
- **.....**

Anti-Fraud Strategy (5)

Bodies involved in combating Fraud

- The MA
- The JS
- The National Authority (of the cooperating country/ies)
- The FLC Systems
- The CA
- The AA
- OLAF
- etc.

Anti-Fraud Strategy:

Concept and Structure

The Strategy

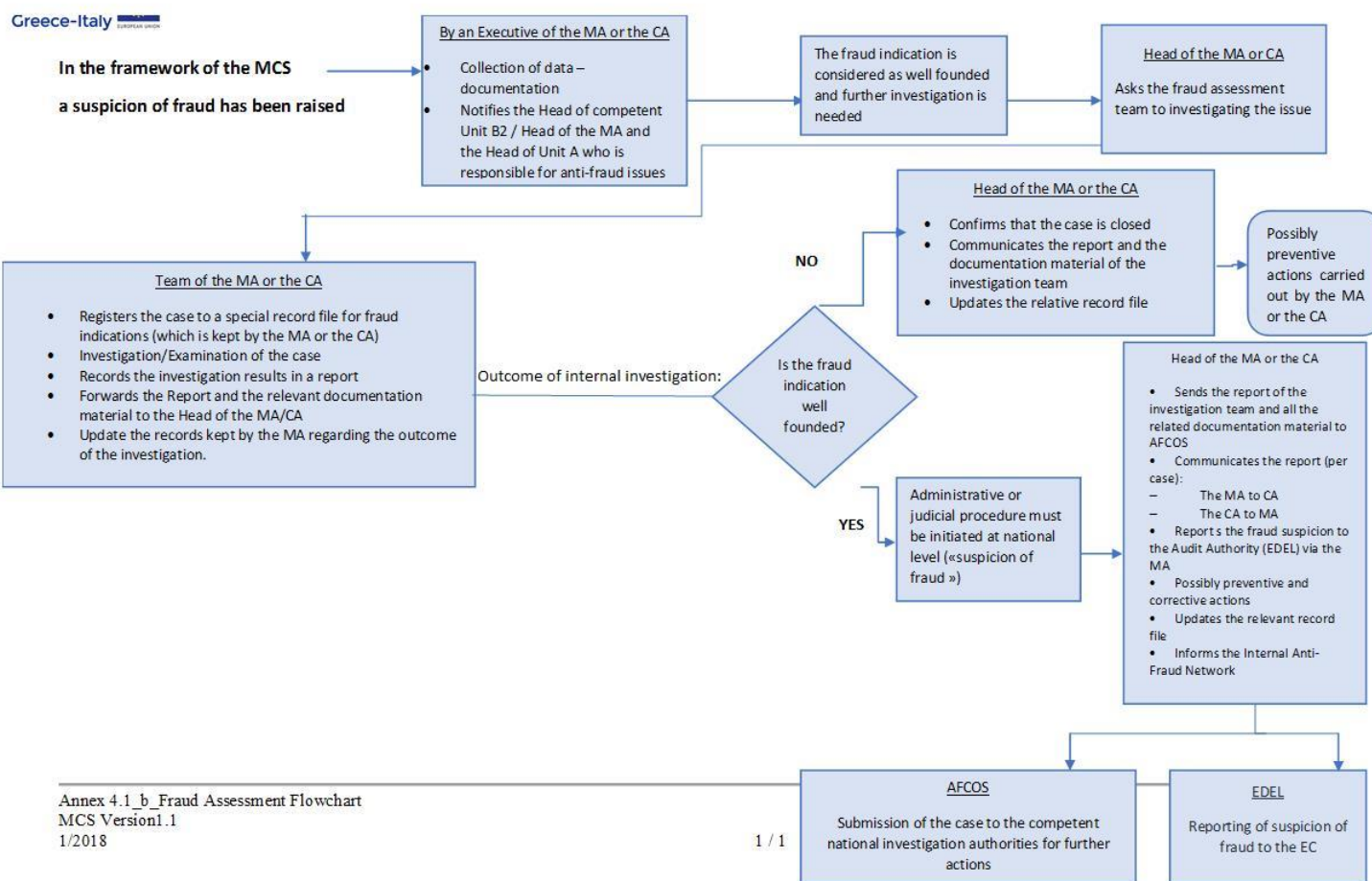
OR

An "holistic" programme of actions

- 1.«Deontology” – Attitude
2. Fraud Risk Management
3. Prevention
4. Detection
5. Investigation, prosecution
6. Recovery of programme funds
7. Monitoring and Training

Fraud Assessment Flowchart (indicative)

For Internal suspicions



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