Conflict of Interests – Red Flags

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Conference of Anti-Corruption and Anti-Fraud Measures 3.12.2013 - Brussels













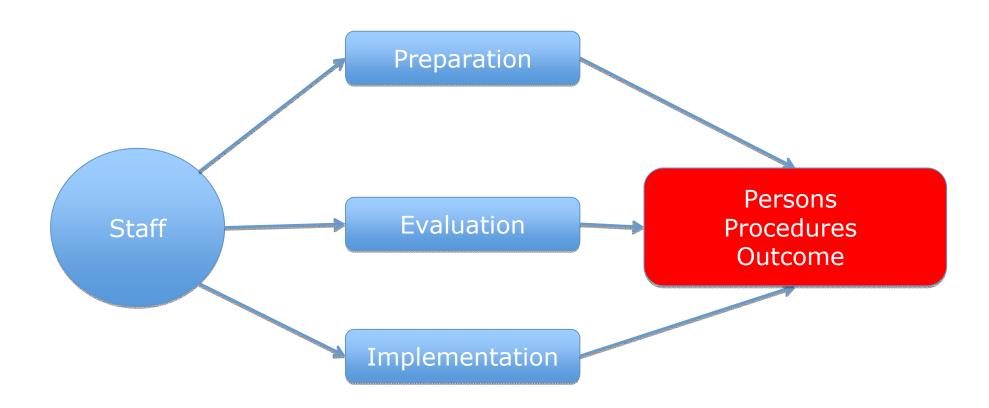
Red flags are:

warning signals, hints, indicators of possible fraud!

The existence of a red flag does **not** mean that fraud exists but that a certain area of activity needs extra attention to exclude or confirm potential fraud.

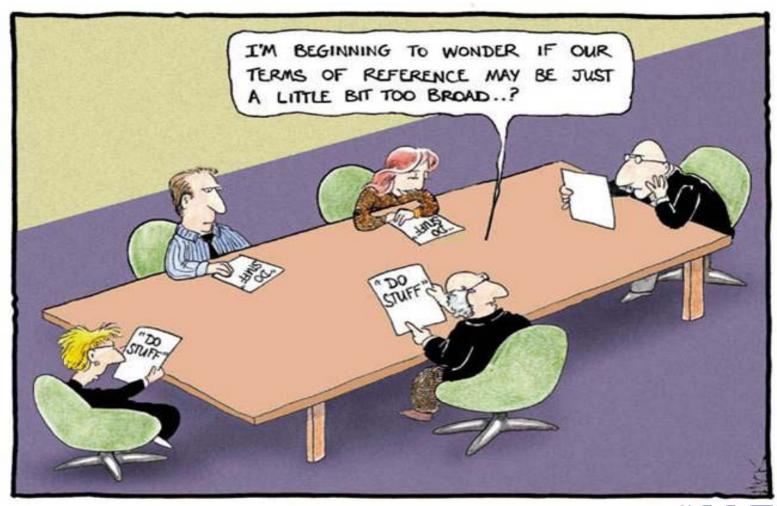
Some patterns, practices and specific forms of activity are red flags that **could signal** irregularities or fraud.







Preparation





Preparation

Persons

Procedure

Outcome

Relatives

- Choice of procedureSmurfing
- Former employments
 - Strange criteria
 - Decoupling

- Unusual questions
- Short deadlines



Evaluation





Evaluation

Persons

Procedure

Outcome

- Lack of expertise
- Monopolisation

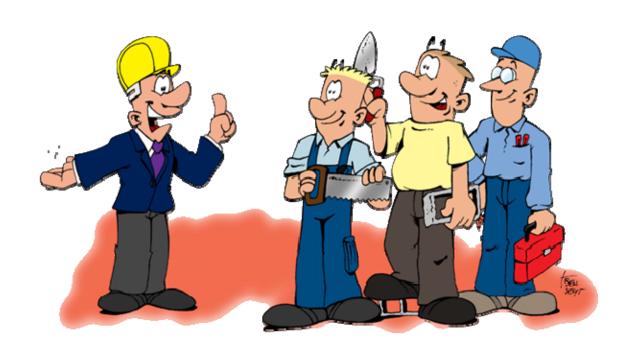
- Subjective elements
- Limited response
- Unknown companies

- Modification in documents
- Missing obligatory information
- Incomplete address





Implementation





Implementation

Persons

Procedure

Outcome

- Questionable changes
- Changes to clauses
- Lack of methodology

- Unusual behaviour
- Changed legal status •
- Changes in terms of reference

Delays

- Reduced quality
- Lack of supporting documents



Verification







Verification

Persons

Procedure

Outcome

- Verify CoI declaration
- Check open sources
- Confirm expertise
- Adequate training

- Procedures followed
- Require independent review
- Verify controls

- Verify physical existence of deliverables
- Site visits



Q9



COUNTERTHINK



