

Clean Sky 2 JU Anti-Fraud Strategy

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1. The context

CS2 JU is one of the bodies implementing the H2020 Programme of the European Commission. The total EU budget amounts to 1,755billion Euro for the period 2014-2020, which will be implemented by 31 December 2024. The private sector contribution will be at least 2,155billion Euro.

In July 2012, a first Anti-Fraud Strategy for the Research sector was established by DG Research and Innovation. It was updated in 2015 and complemented by a common Action Plan¹. These actions deal with the fraud risks related to the implementation of the Research Framework Programmes, as regards direct grant management processes.

In April 2016 the CS2 Governing Board has endorsed the Antifraud Strategy for the Research sector including the related Action Plan to be implemented by CS2 JU, where required.

The operational budget, which represents 98 % of the total is implemented through grants, a common system has been established by DG Research and Innovation. Common rules apply for the grant management in the entire H2020 family, and hence also common risks can be expected. These are addressed at the level of the Research family, and are not fully reflected in this document. However, all aspects of grant management and other areas of expenditure, which are specific to CS2 JU are covered in this Clean Sky S2 JU Anti-Fraud Strategy (CS2 JU AFS).

2. The fraud risk in CS2 JU

The risk of fraud and the potential damage to the JU's financial interests – on the part of the EU and its private Members - depends, in nature as well as quantity, on the type of expenditure and its underlying management/control system.

CS2 JU has the following spending structure², made up of several different control systems, presented below in order of importance

Expenditure type/ control system	Share of total budget %
Grants	98,59 %
Administration	0,81 %
Procurement	0,37 %
Expert management	0,23 %
Grand Total (€)	100,00%

The fraud risk for these expenditure types/control systems – plus for other non-expenditure areas with potential fraud exposure – is analysed in the following and mitigating actions are identified, where required.

² The ratios pertain to the year 2019

2.1 Direct grant management

The fraud prevention and detection measures linked to grant transactions for the Research sector are set out in the common Research Anti-Fraud Strategy (RAFS)³. It defines the broad principles for the fight against fraud and the inter-services cooperation in this respect. It comprises of specific action plans for establishing generic measures for the detection and prevention of fraud in research, like building awareness, establishing technical tools, tackling scientific misconduct, coordinate reinforced monitoring, etc.

As the single sectorial strategy in Research, the RAFS encompasses all the main anti-fraud activities relating to grant management, and for all services within the research family. The joint action plan aims at implementing the RAFS together by common structures or via ad hoc networks.

Direct grant management represents in the CS2 JU approximately 95 % of the total budget. A summary of the JU's specific risk assessment pertaining to direct grant management is shown in **Annex 1** of this Strategy.

Regarding the required ethical behaviour of researchers and the appropriate research integrity, DG R&I has established the Strategy addressing Plagiarism, double funding and research misconduct⁴, please refer to the specific Section 2.2 here below.

A specific area of activity, which is closely linked to direct grant management, has been assessed by the JU separately, i.e. the processes applied for expert management, see Section 2.3 and Annex 2.

Considering the results of this risk assessment and the anti-fraud framework established by the Commission through the RAFS, the residual fraud risk in the Clean Sky research grants is assessed as medium (low likelihood but high reputational impact).

The following actions will be performed to further reduce the potential fraud risks in the area of grant management:

- Finalise the CS2 JU guidance on risk based monitoring within the ex-ante controls including fraud prevention and detection measures.
- Raise awareness amongst the team and management on fraud risks in grant management

2.2 Research integrity

The principles for Research Integrity and Ethics in research of the European Commission are based on the related code of conduct established by the Permanent Working Group on Science and Ethics (PWGSE) of ALLEA (All European Academies).⁵

Research misconduct is defined as breaches of research integrity; the main elements being any form of plagiarism, data falsification and fabrication or unjustifiable double funding. However, research

³ Common Anti-Fraud Strategy in the Research Family, Revision 2019

⁴ *Strategy Addressing the risk of plagiarism, double funding and other research misconduct in EU research expenditure – use of IT detection tools, a review process and follow-up measures*, adopted by the Executive Committee of the CIC on 15th October, 2015.

⁵ The European Code of Conduct for Research Integrity, revised edition 2017

misconduct goes beyond financial implications as reflected by the definition of fraud and irregularities in the Financial Regulation; its impact is not limited to specific grant proposals but also jeopardises the value of science, the reputation of scientists in the scientific community and the research services of the Commission, including the Joint Undertakings.

CS2 JU is following the approach of DG R&I and considers the Code of Research Conduct and the above mentioned guidance as equally relevant for the CS research projects.

The EU's Horizon 2020 research funding programme provides for a specific set of rules on research integrity to be followed by beneficiaries. They are reflected in the Horizon 2020 Model Grant Agreement, which are also used by CS2 JU Model GAs. Article 34 of the GAs explicitly calls for beneficiaries to respect the principles of honesty, reliability, objectivity, impartiality, open communication, duty of care, and fairness and responsibility for future science generations.

The risks pertaining to research integrity are dealt with by the Anti-Fraud Strategy for the Research Family and. They include plagiarism and tampering with research results ("falsifying or fabricating scientific results") by a researcher, please see chapter 2.1 on Direct Grant management and the related Annex 1.

The area is covered by actions undertaken by the members of the Research Family together, as the harmonised processes in the Commission systems and the standardised grant agreements allow here for a common approach.

Hence, CS2 JU follows in this area the risk assessment and the mitigating measures developed by DG R&I. No specific measures for research integrity in CS2 projects have been established by the JU except for a certain enhancement of the awareness regarding the principles of research integrity amongst the JU staff and participants in CS2 projects.

The reputational effects on CS2 JU of scientific misconduct are considered relevant, however in terms of frequency, no cases have been revealed so far in the CS funded projects.

Overall, the fraud risk associated with research integrity for CS2 JU is evaluated at medium (low/medium likelihood, but medium impact, considering the reputational aspects).

The following actions will be performed to further reduce the potential fraud risks regarding research integrity:

- Highlight the principles of the European Code of Conduct for Research Integrity to the participants in the Kick-off meeting for the next call for proposals (CFP 11). Provide the code in the reference documents.
- Integrate into the fraud awareness training regularly provided to CS2 JU staff a section on research integrity

2.3 Expert management

For the execution of its work plan and budget CS2 JU uses experts for various purposes. 60% of the CS2 budget are spent to beneficiaries, which have been selected through open Calls for Proposals.

Furthermore, the annual reviews of the big research consortia, including since recently also impact assessments, are carried out with the input of external experts. Hence, the expert selection process plays a key role in the JU's internal controls.

Therefore, the present anti-fraud strategy includes a specific risk assessment of the expert management of CS2 JU, which is reflected in **Annex 2**.

Overall, the residual fraud risk in expert contracts is considered as low (very low likelihood and medium impact, considering the reputational aspects).

At present no further specific action is required to reduce the risks in the area of expert management.

2.4 Procurement

The number of procurement procedures conducted by CS2JU is limited. The subject of the services contracted is mostly of administrative nature and the value of the contracts is, in average, low. Consequently, the fraud risks related to procurement are less considerable.

Clean Sky 2 Joint Undertaking (CS2JU) Legal Team assists the CS2JU with professional advice regarding the needs and analysis of procurements, as well as the actual preparation of procurement procedures and contracts. The Legal Team also handles the Public Procurement planning of CS2JU and the ex-post publication of contracts. In this way, there is a sound ex-ante control of procurement files in CS2JU.

The main risks in the procurement field in CS2JU are the same as those in all EU services. By following the applicable rules and procedures all over the life-cycle process of the procurement, residual risks become marginal.

The CS2JU consistently applies several measures to prevent and mitigate fraud risks related to procurement. Some of the most effective remedies concern the strengthening of transparency and scrutiny throughout the entire procurement cycle. More details on CS2JU's Fraud Risks & Mitigation Measures in Procurement are provided in **Annex 3** of this Strategy.

The overall fraud risk in the area of procurement is considered as low (very low likelihood, but medium impact, considering the reputational aspects).

The following actions will be performed to further reduce the potential fraud risks pertaining to procurement:

- Integrate into the planned workshop on procurement a section on typical fraud risks in the procurement process

2.5 Administrative expenditure – HR

Recruitment

For its recruitments the JU follows the Staff Regulations and the related Implementing Rules as adopted by the JU Governing Board. Clear workflows are established, which provide for transparent and objective recruitment procedures and limit the possibilities for the JU staff to influence the recruitment decisions in a biased or subjective way.

The Executive Director in his role as AIPN after having analysed all the documents related to selection procedure, signs the final decision on the appointment. The establishment of individual rights is done by PMO.

This CS2 JU Anti-fraud strategy includes a specific risk assessment of the recruitment processes of CS2 in Annex 4.

The fraud risk in recruitment is assessed as low (very low likelihood, but medium impact, considering the reputational aspects).

The following actions will be performed to further reduce the potential fraud risks in the administrative expenditure:

- Integrate into the awareness training a section on typical fraud risks in the recruitment process

2.6 Internal fraud

The main risk when it comes to internal fraud relates to staff members having undeclared conflicts of interest, which could be detrimental in various processes of the JU, like the CfP procedures, validation of reports, procurements, recruitments and of course also financial management and accounting. To ensure a sufficient level of ethical behaviour the JU has adopted the CS JU Code of Conduct for the prevention and mitigation of conflicts of interest and other irregularities as well as for good administrative behaviour. This applies to all staff, to the Executive Director and all other actors of the JU. The Code is complementary to the rules prevailing already in the Staff Regulations.

Regular trainings or workshops are performed for all staff on ethical behaviour and need to be permanently refreshed, as the JU has a rather high fluctuation rate.

A set of declarations is used for a number of standard situations with potential exposure to a conflict of interest, such as:

- accepting honours, decorations, gifts
- publishing a text or a speech
- taking up duties
- applying for public office
- Executive Director
- Selection boards
- Spouse employment
- Outside activity
- Leaving the JU

With a view to the specific situation of the JUs' governance, specific CoI rules for the CS2 JU GB Members have been put in place in compliance with the JU Regulation.

Given the rigid CoI rules and Code of conduct established by the JU in full consistency with the rules prevailing in the EC and taking into account their proven effectiveness, the risk of internal fraud is assessed as overall low/medium (low likelihood but medium impact, considering the possible negative reputational aspects).

The following actions will be performed to further reduce the risks of potential conflicts of interest:

- Raise awareness about the risk of conflicts of interests among staff through regular reminders.

2.7 In-kind contribution of private Members

In the JU's financial reporting, the contribution of the private Members to the funded projects is included in the expenditure of the grants. Therefore, potential fraud risks pertaining to the so called operational In-kind contribution (IKOP) are covered to the same extent as fraud in funded projects. Regarding the purely financial risk of overstating the reported in-kind contribution through inflating costs, we consider the risk as low, as the reported total project costs are certified by independent auditors.

Additional Activities (AAs) form part of the private Members contribution in the same way as the IKOP, but are not subject to eligibility rules and are not recorded in the JU's accounts. AAs do not contribute to the CS2 programme and do not necessarily comprise exclusively of research activities. The main control in place for preventing and detecting fraudulent IKAA reporting is the certificate carried out by independent auditors according to a related JU procedure. Furthermore, the content related link of the AAs to the CS programme objectives is assessed by the JU team – here the rules on CoI and the Code of Conduct endorsed by the CS2 JU as published on the JU's website apply. As another layer of control, the AAs are validated by the Governing Board in the planning stage and when finally reported after certification.

So far, no case of fraudulent behaviour has been identified in the IKOP and IKAA validation and reporting processes.

Overall, the residual risk in the area of IKC is considered as low/medium (low likelihood, but medium impact, considering the reputational aspects).

At present no further specific action is required to reduce the potential fraud risks related to the management of in-kind contribution provided by the private Members of the JU.

3. Summary of risk assessment by expenditure type/area of JU activity

Following the above introduction, the table below presents CS2 JU's assessment of the fraud risks in its individual types of expenditure for the entire programme and for the non-expenditure areas. The fraud risk is assessed in terms of likelihood and impact.

	Type of expenditure/ non-expenditure area	Fraud risk management ⁶	Total amount (M€)	Fraud risk - likelihood	Fraud risk - Impact ⁷	FRAUD RISK - OVERALL
1	<i>Grants</i>	<i>DG RTD and CS2 JU</i>	1 716	<i>Low</i>	<i>High</i>	<i>Medium</i>
2	<i>Research Integrity</i>	<i>DG RTD and CS2 JU</i>	-	<i>Low/Medium</i>	<i>Medium</i>	<i>Medium</i>
3	<i>Experts management</i>	<i>CS2 JU</i>	6	<i>Very Low</i>	<i>Medium</i>	<i>Low</i>
4	<i>Procurement</i>	<i>CS2 JU</i>	50	<i>Very Low</i>	<i>Medium</i>	<i>Low</i>
5	<i>Administrative and other</i>	<i>CS2 JU</i>	22	<i>Very Low</i>	<i>Medium</i>	<i>Low</i>
6	<i>Internal fraud</i>	<i>CS2 JU</i>	-	<i>Low</i>	<i>Medium</i>	<i>Low/Medium</i>
7	<i>In-kind Contribution</i>	<i>CS2 JU</i>	2 155	<i>Low</i>	<i>Medium</i>	<i>Low/Medium</i>
	GRAND TOTAL (M€)		3 949			

⁶ This column indicates whether the fraud risk mitigation for the expenditure/area in question is managed mainly by CS2 JU or together with DG RTD .

⁷ Materiality and/or reputational risk.

Annexes

Annex 1 - Direct grant management

Fraud risks and mitigation measures

In CS2 JU direct grant management is governed by a set of controls, which is applicable for the entire research sector and which is mainly described in the RAFS. Besides awareness raising for fraud risks for staff, main measures for fighting fraud are the development of appropriate IT tools, which are commonly used by the entire research sector, and systems supporting the actors in all stages of the grant cycle for identifying potential fraud risks.

The Risk Management Module in SyGMA enables the JU to take the appropriate measures to protect its financial interests through appropriate measures to mitigate fraud risks.

An important source for identifying red flags for applicants and beneficiaries regarding potential fraud is the Early Detection and Exclusion System of the Commission (EDES). Before signing grant agreements and as a standard check in the REPA process, any information about an entity in EDES is considered.

If a significant risk related to the implementation of the funded action has been identified, Reinforced monitoring measures are taken according to a pre-defined typology of monitoring categories, as detailed in the Guidance on H2020 ex-ante controls on interim & final payments. Several of these categories relate to fraud risks, like ethics risks, suspected irregularity/fraud (incl. plagiarism or double funding), findings on irregularity or fraud (incl. OLAF findings).

For the purpose of monitoring the potential fraud risks, a dedicated process is in place to check any active warnings.

In addition, the “Guidance on H2020 ex-ante controls on interim & final payments” provides a detailed and tailored overview of types of ex ante checks to be applied before validating payments.

As from December 2019 two tools for performing “Double Funding and Plagiarism checks” have been released by DG R&I for the use in the research family, Aris and SIMBA.

DG R&I respectively DG Budget have developed harmonised guidance on tools and checks to be performed to prevent and detect fraud, like:

- the Guidance Note on Quick Checks to detect fraud risks
- the EU Grants Guidance on Double funding and plagiarism checks

The Guidance note “Quick checks to detect fraud risks” also available in Go Fund provides the parameters to identify risks (so called ‘red flags’), the list of additional checks that should be performed to confirm the risk of fraud or severe irregularities, and the measures that the operational unit can take in case the risk is confirmed.

On the JU level, an internal guidance on risk based monitoring within the ex-ante controls has been established⁸.

The controls in place to cover fraud risks in expert management are described in the dedicated chapter on this phase of the grant lifecycle (see chapter 2 and annex 2).

⁸ CSJU internal guidance for risk-based monitoring in CS2 projects, Version 0.1 - 26/02/2021

Annex 2 - Expert management

Fraud risks and mitigation measures

The CS2JU follows the Horizon 2020 guidance on Expert management⁹.

The JU makes use of the database of experts as coordinated and maintained by the European Commission, pursuant to the CS2JU Financial Rules. These “experts” are generally part of a panel and may have a contract with the JU for the following activities:

1. in the **evaluation of proposals** as “expert evaluators”, pursuant to CS2JU Statutes and Articles 15(7) and 40(1)(a) of the Horizon 2020 Rules for Participation;
2. in the **monitoring of the implementation of CS2JU actions** as “experts” in order to assist the JU in the review of specific aspects of a contract/project¹⁰, pursuant to Article 40(1)(b) of the Horizon 2020 Rules for Participation;
3. in the **fulfilment of tasks in support to CS2JU operational activities**, pursuant to the CS2JU Financial Rules and Article 287 of Delegated Regulation 1268/2012:
 - a) as an “**individual expert**” or in an “**expert group**” that is mostly tasked to draft a scientific report to be used in the frame of the CS2JU’s work or;
 - b) as “**meeting experts**”¹¹

For these activities, they may either receive a remuneration for their work [points 1, 2 and 3.a)] or be reimbursed for the costs they incur to attend the “meeting experts” [point 3.b)]. The JU has a designated team for the *expert management* which is made up of two JU staff members (the Call Coordinator and the Programme Call Assistant) supported by the Project Officers team.

For the *contracting and payment of the experts* the JU makes use of the applicable EC IT tools - mainly EMI / Compass interfaced with ABAC payment system - and closely analyses and monitors experts’ attendance lists, experts’ files and reports as well as costs claimed by the experts.

The known risk schemes related to experts are linked to:

- The selection process: inherent risk of selecting only existing experts (“the usual suspects”) and/or the people recommended by these (“friends of friends”);
- Exceeding the maximum number of days allowed for working as an expert (i.e. the H2020 “rotation rules”);
- Collusion between an insider staff and an expert, resulting in a payment made against ‘fake’ documentation and no (or only partial) work performed;
- Conflicts of interests;
- False cost declarations.

⁹ See H2020 Online Manual, “Working as an expert” https://ec.europa.eu/research/participants/docs/h2020-funding-guide/experts/experts_en.htm

¹⁰ This is commonly called a “technical/scientific review”, e.g. ARM or IPR.

¹¹ E.g. for Clean Sky Academic Group, selection of PhD award

To mitigate these risks, the JU follows the approach of the European Commission and ensures that the latest Horizon 2020 guidance concerning **rotation rules, model contract for experts and annexes, declaration about conflict of interests** are shared and implemented.

Overall, the JU is not aware that any fraud cases have happened in relation to experts used in the frame of its activities.

Each Manager and member of the staff in charge of a given operational process, project, or activity, is made aware of the risks that the expert management may incur. The JU systematically briefs and follows up with the experts' management with a view to take preventive measures and suitable steps to ensure that those measures are effective.

Annex 3 - Procurement

Fraud risks and mitigation measures

The legal team of CS2JU assists with professional advice in the actual preparation of procurement procedures and contracts. The legal unit also handles the public procurement planning of the JU and the ex-post publication of contracts. In this way, there is a sound ex-ante control of procurement files in CS2JU. Prior to the launch of every procurement procedure, the legal team organises kick-off meetings with the staff involved in the upcoming procurements advising them on the applicable rules and the type of procurement procedure to be put in place, the internal procedures to be followed and the rules/templates to be respected in order to ensure the soundness of the procurement procedure.

The main risks in the procurement field in CS2JU are the same as those in all EU services. By following the applicable rules and procedures all over the life-cycle of the procurement, residual risks become marginal.

The procurement rules applicable to the CS2JU are laid down in Article 43 of the CS2JU Financial Rules¹². The JU is bound to comply with the **same principles and rules on Procurement as the ones applicable to the European Commission**, subject to a limited number of specificities, mentioned explicitly in Paragraphs 2 to 5 of Article 43.

In general, the **number of procurement procedures** conducted by CS2JU is relatively **limited**¹³. The subject of the services contracted is mostly of administrative nature (e.g. logistics, IT services, communication services, analysis/studies) and the value of a high portion of the contracts is low (< Euro 15.000). Consequently, the fraud risks related to procurement are less considerable as compared to the operational activities of the JU.

Given that the high-value public procurements are generally considered as best and more transparent practice, the CS2JU supports the conduct of **inter-JU procurement procedures** (open tenders) with the participation of other interested Joint Undertakings, instead of launching low value procurement procedures on its own. Thus, further scrutiny, transparency and effective competition in the conduct of CS2JU's procurement are guaranteed.

The workflows in the procurement process in CS2JU are based on the **four-eyes principle**. This approach not only ensures the efficiency of processes by enabling fast decision-making

¹² Financial Rules of the Clean Sky 2 Joint Undertaking, https://www.cleansky.eu/sites/default/files/inline-files/CS-GB-Writ%20proc%202019-07%20Revised%20Financial%20Rules_Published.pdf

¹³ The number of procurement procedures conducted by CS2JU varies every year, generally on a scale from 25 to 45 procedures [R:\05-Manage the JU\20-Legal\CSJU Contracts table..xlsx](#)

while ensuring effective control and monitoring, but also considerably increases the levels of transparency and decreases potential fraud risk.

Aiming at enhancing transparency and scrutiny throughout the entire procurement cycle, the JU has put in place some additional measures to mitigate fraud risks in the procurement procedures:

- CS2JU staff involved in the opening and evaluation process of all tenders, even for low-value procedures, signs a **“Declaration of absence of conflict of interests and of confidentiality”** in accordance with the Article 61 of Regulation (EU, Euratom) 2018/1046 on the financial rules applicable to the general budget of the Union. If a case of conflict of interests is identified, the concerned CS2JU staff is immediately excluded from the procedure and replaced by another representative.
- For the sake of transparency, the CS2JU **publishes on its website tender notices even for low-value procedures** under EUR 15,000.00, while the applicable legal threshold for publication is above 15,000.00. In this way, the risk of providing information relative to a procurement initiative only to preferred entities during administration of a call for tender is effectively avoided.
- CS2JU asks for a **“Declaration on honour on exclusion and selection criteria”** from all tenderers regardless of the value of the procurement procedure in which they participate. Requesting this declaration is optional for low-value contracts up to EUR 15,000, but it is advisable for risk-mitigation purposes.

CS2JU is in the process of finalizing its registration to the **E-SUBMISSION system** of the European Commission. The E-SUBMISSION system will further facilitate the application process for candidates from remote areas and as a result improve equal treatment and non-discrimination. Moreover, the fully electronic processing and storage of procurement documentation will ensure an additional level of transparency of decision-making.

Audits are performed every year at the CS2JU by the European Court of Auditors (ECA), always focussing on the legality and regularity of payments carried out in the context of procurement procedures. Recommendations issued by the Auditors regarding the JU's procurement process are consistently implemented. In this way, the JU enhances its controls to prevent and mitigate fraud risks related to procurement along the lines of the ECA recommendations.

As a criticality regarding the procurement procedures of CS2JU, more extensive **“market analysis” capabilities** across the CS2JU Teams/Units requires consideration. This could be important, especially for cases of “captive markets”, in order to determine the objectives and technical specifications of specific type of services requiring an in-depth ex ante analysis of the market.

Annex 4 - HR Management

Fraud risks and mitigation measures Recruitment

In the management of HR activities the activity which might be at risk of fraud is the selection and recruitment of new staff.

The selection and recruitment procedures in the JU are established in the following documents

- CS-GB-Writ proc 2019-05 Decision on engagement Contractual Agents
- CS-GB- Writ proc 2015 – 06 decision on engagement and use of Temporary Agents 2f

During the selection procedure a selection panel composed of 3 or 4 members is appointed by the Executive Director.

The members of the selection panel are requested to sign 2 documents:

- In accordance with Annex III of the Staff Regulations and with articles 26 and 29 (Annex I) of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data; the panel members sign a Data Processing Statement declaration.
- Declarations with reference to Absence of Conflict of Interest. Once the panel members receive the list of candidates, they shall declare all candidates they know in a professional and personal capacity and the nature of the relationship. They must also make a declaration to the effect that they can or cannot maintain impartiality and independence all along the selection process. The panel members also sign a declaration of confidentiality not to disclose the content of the procedure.

The Executive Director makes an assessment of the situation described in each declaration and decides if the panel members can continue in the selection procedure. If any significant conflict of interest is detected by the Executive Director, he decides to exclude the concerned panel member and appoints another member.

The recruitment is finalised by the Executive Director. The establishment of individual rights is delegated to the PMO of the Commission.

In the annual audits of the European Court of Auditors (ECA), the JU's recruitment procedures are reviewed regarding their legality and regularity. Recommendations issued by the Auditors regarding the JU's recruitment process are consistently implemented. In this way, the JU enhances its controls to prevent and mitigate fraud risks related to recruitment along the lines of the ECA recommendations.

Annex 5: Action Plan against fraud in CS2 JU

	Action	Unit in charge	Output	Deadline
1	Finalise the CS2 JU guidance on risk based monitoring within the ex-ante controls.	Finance	CS2JU specific guidance document on ex-ante control	Dec 2020
2	Raise awareness amongst the team and management on fraud risks specifically related to grant management	Admin and Operational	General fraud awareness training	Dec 2020
3	Highlight the principles of the European Code of Conduct for Research Integrity to the participants in the Kick-off meetings for the calls for proposals (next one is CFP 11) and elaborate on the related requirements for researchers. Provide the code in the reference documents.	Operational	Update provided regarding Research Integrity to new participants in the KOM of CfP11	Sept 2020
4	Integrate into the fraud awareness training regularly provided to CS2 JU staff a section on research integrity	Admin	Update/enlarge content of general fraud awareness training	Dec 2020
5	Integrate into the planned workshop on procurement a section on typical fraud risks in the procurement process	Legal	Update/enlarge content of procurement W/S	March 2021
6	Integrate into the fraud awareness training regularly provided to CS2 JU staff a section on fraud risks pertaining to the recruitment process	Admin	Update/enlarge content of general fraud awareness training	March 2021
7	Raise awareness about the risk of conflicts of interests among staff through regular reminders	Admin	Reminder for all staff on rules for potential conflicts of interest	Dec 2020