

Written Procedure

Subject:	Adoption of the eu-LISA Anti-Fraud Strategy 2022-2024
Phase:	Closure of the procedure
From:	Chairperson of the Management Board
To:	Management Board
Previous documents:	2019-196, 2022-294

According to Articles 19(1)(h) and 24(3)(j) of Regulation (EU) 2018/1726 on eu-LISA, the Executive Director shall prepare and submit and the Management Board shall adopt an anti-fraud strategy, proportionate to the risk of fraud, taking into account the costs and benefits of the measures to be implemented. The previous strategy was adopted by the Management Board in March 2019 and covered the period 2019-2021.

On 3 August 2022 the draft eu-LISA Anti-Fraud Strategy covering the period 2022-2024 (document 2022-196), was sent for the decision of the Management Board via written procedure.

By the deadline of the written procedure on 17 August 2022, the European Commission highlighted the fact that the ACFC positive opinion on the draft anti-fraud strategy was pending the incorporation of the comments received from them. The remarks submitted by the European Commission and by OLAF in written after the ACFC meeting were all addressed and incorporated in the draft version of the document (document 2022-196 submitted for the Management Board's adoption).

In addition, on 17 August 2022, the European Commission submitted two additional remarks (i.e. 1 - The fraud risk assessment should be aligned with the three years cycle of the anti-fraud strategy; 2 - Anti-fraud principle 5 is reformulated) and informed that they support the adoption of the procedure provided that the comments are taken into consideration. After assessing the remarks with the Internal Audit Capability: 1) it was agreed to align the fraud risk assessment with the three years cycle of the anti-fraud strategy; 2) For principle 5 we strongly encourage to keep the formulation unchanged. The text of Principle 5 is the one recommended by best practises (ref. Fraud Risk Management Guide by COSO&ACFE, 2016). Moreover, it includes a distinct requirement on communication of fraud risk management program deficiencies.

Considering that the change of the frequency of the fraud risk assessment from "three-four years" to "three years" is not changing the content of the strategy, in accordance with the provisions of Article 8 of the Agency's Rules of Procedure, the Management Board decides to adopt the following decision by written procedure:

The Management Board decides to adopt the eu-LISA Anti-Fraud Strategy 2022-2024 as set out in document 2022-196.

Zsolt Szolnoki

Chairperson of the Management Board