

## SECTION 9.3: Alignment with ECCTA 2023

### ECCTA 2023 Requirement | Current Status | Evidence | Gap

Governance Framework | ✓ | [PROVIDE DETAILS] | [IDENTIFY GAPS]  
Fraud Risk Assessment | ✓ | [PROVIDE DETAILS] | [IDENTIFY GAPS]  
Cultural & Control Environment | ✓ | [PROVIDE DETAILS] | [IDENTIFY GAPS]  
Staffing & Competency | ✓ | [PROVIDE DETAILS] | [IDENTIFY GAPS]  
Technical Controls | ✓ | [PROVIDE DETAILS] | [IDENTIFY GAPS]  
Monitoring & Assurance | ✓ | [PROVIDE DETAILS] | [IDENTIFY GAPS]  
Reporting & Investigation | ✓ | [PROVIDE DETAILS] | [IDENTIFY GAPS]

## SECTION 10: FRAUD RESPONSE PLAN

### 10.1 Fraud Disclosure & Investigation Protocol

#### Initial Response Timeline:

- Report received and logged within: [ ] hours
- Initial assessment completed within: [ ] hours
- Investigation commenced within: [ ] hours

#### Investigation Process - Four Phases:

##### Phase 1: Triage & Initial Assessment [ ] days

- Severity assessment (High/Medium/Low)
- Preliminary evidence gathering
- Conflict of interest check

##### Phase 2: Detailed Investigation [ ] days

- Evidence preservation
- Witness interviews
- Document review
- Forensic analysis (if required)
- External specialist engagement (if required)

##### Phase 3: Finding & Recommendation [ ] days

- Investigation report prepared
- Findings documented
- Recommendations for remedial action

##### Phase 4: Resolution & Closure [ ] days

- Remedial actions implemented
- Follow-up procedures

- Case closure documentation

## 10.2 Disciplinary Framework - Progressive Approach

### 1. Verbal Warning

Criteria: ☐ | Approval Authority: ☐ | Documentation: ☐

### 2. Written Warning

Criteria: ☐ | Approval Authority: ☐ | Documentation: ☐

### 3. Suspension

Criteria: ☐ | Approval Authority: ☐ | Duration: ☐

### 4. Dismissal

Criteria: ☐ | Approval Authority: ☐ | Process: ☐

### 5. External Reporting/Prosecution

Criteria: ☐ | Approval Authority: ☐ | Reporting Channel: ☐

## 10.3 External Reporting Obligations

Regulatory Reporting Required To: ☐

Threshold for Reporting: ☐

Responsible Party: ☐

Timeline for Reporting: ☐

Law Enforcement Reporting:

Circumstances requiring notification: ☐

Approval authority: ☐

Communication channel: ☐

Timeline: ☐

## 10.4 Lessons Learned & Continuous Improvement

Post-Incident Review Questions:

- How was the fraud discovered?
- Why was it not detected earlier?
- Were existing controls bypassed? If so, how?
- What corrective actions are required?
- Are there systemic improvements needed?

Corrective Actions Implementation:

Action #	Description	Responsible Party	Target Completion Date	Status
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## SECTION 11: FRAUD AWARENESS & TRAINING

### 11.1 Training Program Overview

Goal: Build organizational awareness and capability to recognize, prevent, and report fraud.

Target Audiences:

- All staff members
- New joiners (Induction required on hire)
- Senior management
- Finance/Procurement/HR staff
- Contractors and suppliers
- Board members

### 11.2 Mandatory Training Schedule

Training Module | Target Audience | Frequency | Delivery Method | Evidence

Counter-Fraud Fundamentals | All staff | ☐ | ☐ | ☐

Role-Specific Fraud Prevention | Finance, HR, Procurement | ☐ | ☐ | ☐

Manager Fraud Awareness | Managers & Supervisors | ☐ | ☐ | ☐

Senior Leadership Fraud Governance | Exec Team & Board | ☐ | ☐ | ☐

Whistleblower Protection | All staff | ☐ | ☐ | ☐

Induction Training | New joiners | On hire | ☐ | ☐

Supplier/Contractor Training | External parties | ☐ | ☐ | ☐

### 11.3 Training Content Framework

Module 1: Counter-Fraud Fundamentals (30 minutes)

- Definition of fraud
- Common fraud schemes in our organization
- Impact of fraud
- Red flags and warning signs
- How to report concerns
- Protection for whistleblowers

Module 2: Role-Specific Fraud Risks (60 minutes)

- Fraud risks relevant to specific roles
- Control procedures in place
- Procedures for handling exceptions
- How to escalate concerns
- Case study examples

### Module 3: Manager Fraud Awareness (45 minutes)

- Recognizing fraud indicators
- Creating culture of integrity
- Investigating concerns
- Documentation requirements
- Escalation procedures

### Module 4: Governance & Strategy (90 minutes)

- Fraud risk framework
- Industry trends
- Regulatory expectations
- Board oversight responsibilities
- Fraud response capability

## 11.4 Training Records & Compliance Tracking

Training Compliance Target: % by

Tracking Mechanism:

Responsible Party:

Reporting Frequency:

Non-Compliance Action:

## SECTION 12: MONITORING & EVALUATION

### 12.1 Key Performance Indicators (KPIs)

Metric | Target Value | Frequency | Responsible Party

Fraud cases reported per month |  |  |

Average investigation time (days) |  |  |

Training completion rate (%) |  |  |

Number of high-risk controls tested annually |  |  |

Number of system anomalies detected |  |  |

Whistleblower feedback survey score |  |  |

Sanctioning rate (% of cases requiring discipline) |  |  |

### 12.2 Monitoring Activities

Continuous Controls Monitoring (CCM):

- Systems and transactions monitored:
- Monitoring tools utilized:
- Frequency of review:
- Responsibility for follow-up:

Spot Checking & Sample Testing:

- Transaction population tested:
- Sample size:
- Testing frequency:
- Sampling methodology:

Proactive Data Analytics:

- Data sources analyzed:
- Analytical techniques employed:
- Frequency of analysis:
- Tools used:

### 12.3 Regular Review & Reporting

Board Reporting:

- Reporting frequency:
- Key metrics included:
- Format/template:
- Recipient:

Audit Committee Reporting:

- Reporting frequency:
- Key metrics included:
- Format/template:
- Recipient:

Management Reporting:

- Reporting frequency:
- Key metrics included:
- Distribution list:

### 12.4 Internal Audit Scope

Annual Audit Plan Coverage:

- High-risk fraud areas identified:
- Audit procedures for each area:
- Frequency of coverage:
- Responsibility:

## SECTION 13: DOCUMENT CONTROL & APPROVAL

### 13.1 Document Information

Document Title: Comprehensive Fraud Risk Assessment

Version: 1.0

Date of Issue: [ ]

Status: Draft / Final / [ ]

Author/Prepared By: [ ]

Reviewed By: [ ]

Approved By: [ ]

### 13.2 Version Control

Version | Date | Author | Changes

1.0 | [ ] | [ ] | Initial creation

[ ] | [ ] | [ ] | [ ]

[ ] | [ ] | [ ] | [ ]

### 13.3 Distribution Record

Recipient | Date Provided By | Review Complete By | Signature

[ ] | [ ] | [ ] | [ ]

[ ] | [ ] | [ ] | [ ]

[ ] | [ ] | [ ] | [ ]

### 13.4 Document Retention

Retention Period: [ ] years

Storage Location: [ ]

Access Restrictions: [ ]

Disposal Method: [ ]

## SECTION 14: APPENDICES & SUPPORTING MATERIALS

14.1 Fraud Case Study Scenarios

14.2 Fraud Detection Case Study Examples

14.3 Sample Whistleblower Report Form

14.4 Sample Investigation Checklist

14.5 Sample Disciplinary Decision Template

14.6 Fraud Risk Matrix

14.7 Control Effectiveness Assessment Template

14.8 Industry Fraud Benchmarking Data

14.9 Regulatory Framework Summary

14.10 Glossary of Fraud-Related Terms

## CONCLUSION

This Comprehensive Fraud Risk Assessment provides a robust framework for identifying, preventing, and responding to fraud across all organizational functions.

The implementation of the recommendations outlined in this assessment will strengthen the organization's control environment and reduce exposure to fraud risks.

Key Success Factors:

- Sustained commitment from leadership
- Regular monitoring and evaluation of the fraud prevention framework
- Continuous training and awareness programs
- Swift investigation and appropriate sanctions
- Regular review and updates to the fraud risk assessment

The organization remains committed to maintaining a strong anti-fraud culture and shall continue to enhance its fraud prevention and detection capabilities.

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