

Anti-Fraud Strategy Of the Agency for Support for BEREC 2026–2028

5 December, 2025

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Executive summary

The Anti-Fraud Strategy (AFS) 2026–2028 sets out the Agency’s framework for preventing, detecting and managing fraud risks, in line with Regulation (EU) 2018/1971 establishing the Body of European Regulators for Electronic Communications (BEREC) and the Agency for Support for BEREC (BEREC Office, Agency),¹ the Framework Financial Regulation (EU) 2019/715 (FFR) and Article 325 of the Treaty on the Functioning of the European Union (TFEU). Its purpose is to safeguard the Union’s financial interests and protect the integrity and reputation of both the BEREC Office and BEREC.

The evaluation of the 2023–2025 AFS² confirmed that all planned actions were implemented and provided the basis for the 2025 fraud-risk assessment, which concluded that the Agency’s overall exposure to fraud remains low. The assessment also identified two residual areas requiring continued preventive measures: (i) the management of sensitive non-classified information (SNCI)³ and (ii) ethics and integrity.

On this basis, the 2026–2028 AFS establishes four operational objectives translated into concrete actions set out in the Action Plan (Annex).

The AFS is a living document implemented under the responsibility of the Director, with the support of the Anti-Fraud Officer. Progress will be monitored and reported annually through the Consolidated Annual Activity Report. The Strategy will be assessed annually and subject to review and update every three years to ensure its continued relevance and effectiveness, taking into account legislative, organisational, and institutional developments including any review of Regulation (EU) 2018/1971 (BEREC Regulation) that may affect the mandate, responsibilities or budget of BEREC and the BEREC Office.

¹ [Regulation \(EU\) 2018/1971 - EN - EUR-Lex](#)

² [Decision No MB/2023/04 of the Management Board of the Agency for Support for BEREC \(BEREC Office\) on the Anti-Fraud Strategy 2023-2025](#)

³ Sensitive non-classified information (SNCI) is information not subject to EUCI rules but still requiring protection against unauthorised disclosure (cf. Article 39 of Regulation (EU) 2018/1971).

1. General background

This chapter outlines the institutional and organisational context in which the Anti-Fraud Strategy is implemented. It explains the broader Union framework, the specific features of the BEREC Office as an EU agency, and the role of BEREC itself. These elements determine the nature and extent of the fraud risks to which the Agency may be exposed, and, consequently, shape the preventive measures defined in this Strategy.

1.1 The Union context

The Union legal framework (Article 325 TFEU) obliges all EU institutions, bodies and agencies, together with the Member States, to protect the Union's financial interests against fraud and irregularities. The Financial Regulation⁴ and the FFR require agencies to put in place internal control systems to prevent, detect, correct and follow up on fraud, irregularities and conflicts of interest, and to adopt an AFS. Against this background, the BEREC Office AFS forms an integral part of its internal control system. It is aligned with Internal Control Principle No 8 on the assessment of fraud risks and with Article 30(2)(d) and (e) of the FFR, which require controls for the prevention, detection, correction and follow-up of fraud and irregularities, as well as the management of risks relating to legality and regularity of transactions.

The BEREC Office AFS is also consistent with the principles of the Commission AFS (C(2019) 1962 final),⁵ which emphasises zero tolerance, transparency, professional integrity and cost-effectiveness of controls. In cases of suspected fraud, the BEREC Office informs and cooperates fully with OLAF and, where applicable, the European Public Prosecutor's Office (EPPO).

1.2 The BEREC Office specific context

The BEREC Office is an EU Agency established by Regulation (EU) 2018/1971 to support BEREC in the consistent implementation of the European regulatory framework for electronic communications. To this end, the BEREC Office provides the professional and administrative support necessary for BEREC's work and contributes to BEREC's regulatory work for the benefit of people in Europe.

The Agency's internal structure comprises three units: Operation Support, Programme Management, and Administration and Finance, each led by a Head of Unit under the authority of the Director, who is the Agency's sole senior manager. The establishment plan currently foresees 17 temporary agents, complemented by 23 contract agents and 9 seconded national experts (SNEs). All staff members are subject to the obligations set out in the TFEU, the Staff Regulations, and the Conditions of Employment of Other Servants (CEOS). The BEREC Office budget for 2024, as adopted by Management Board, amounted to **7.93 million EUR**, financed mainly through the EU contribution. Expenditure covers staff costs (4.93 million EUR,

⁴ [Regulation \(EU, Euratom\) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union \(recast\)](#)

⁵ [Commission Anti-Fraud Strategy: enhanced action to protect the EU budget](#)

62%), infrastructure and operating expenditure (1.71 million EUR, 21%) and support for BEREC activities (1.30 million EUR, 16%).

The Management Board (MB) is composed of the heads of the national regulatory authorities (NRAs) of the Member States and one representative of the European Commission. It adopts the Agency's budget, the Single Programming Document (SPD), and appoints the Director. The Director is accountable to the MB and responsible for the administrative management of the Agency, following the guidance of the Board of Regulators and the MB.

The BEREC Office Advisory Group (BAG), composed of at least six members of the MB - their alternates or other senior representatives from NRAs - with relevant experience in areas such as finance, budgeting or human resources, advises the MB and the Director on administrative matters such as programming, budget, staff, audits or reporting. The BAG is not established by the BEREC Regulation itself, but by the MB through its Rules of Procedure (Article 3)⁶.

1.3 The BEREC specific context

BEREC is a Union body established by Regulation (EU) 2018/1971. It is composed of:

- **The Board of Regulators (BoR)** which brings together the heads of national regulatory authorities (NRAs) responsible for electronic communications in each EU Member State, with one voting member per country. The BoR is also open to the participation of NRAs from third countries with which working arrangements have been established; these representatives participate without voting rights⁷. The European Commission takes part in the BoR's deliberations, also without voting rights, and observers may be invited where relevant.
- **The Contact Network (CN)** established by the BoR through its Rules of Procedure acts as the preparatory body of the Board. Composed of senior representatives of the NRAs and the Commission, it coordinates the work of the BoR, reviews draft documents and ensures consistency before their submission for adoption.
- **BEREC working groups (WG)** are established by the BoR, where justified, to implement BEREC's annual work programme. Chaired by NRA representatives appointed by the BoR, they are composed of NRA experts and support the BoR by preparing draft opinions, reports and guidelines for adoption.

Pursuant to Article 4 of the BEREC Regulation, BEREC is entrusted with a wide range of regulatory and advisory tasks in the field of electronic communications. It issues guidelines, opinions, recommendations, reports and common positions, which, while not legally binding, are taken into utmost account by national regulatory authorities, the European Commission,

⁶ [Rules of Procedure of the Management Board of the BEREC Office](#)

⁷ At the time of adoption of this Strategy, the following third-country NRAs participate in the BoR without voting rights: AKEP (Albania), RAK (Bosnia & Herzegovina), ARKEP (Kosovo), AK (Liechtenstein), ECOI (Iceland), Montenegro (EKIP), North Macedonia (AEC), Norway (Nkom), Serbia (RATEL), Ukraine (NCEC), Moldova (ANRCETI). The current list is available on the BEREC website.

the Council and the European Parliament. Through these instruments, BEREC provides independent and impartial expertise to ensure the consistent application of the Union regulatory framework and to promote the functioning of the internal market for electronic communications. In addition to the BEREC Regulation, BEREC fulfils its tasks in compliance with the European Electronic Communications Code (EECC)⁸, the Roaming Regulation and the Telecoms Single Market Regulation.

The institutional framework is organised as shown in Figure 1: BEREC, which has no legal personality, is a Union body with regulatory and advisory tasks, and the BEREC Office, as an EU Agency with legal personality, provides professional and administrative support under the oversight of the MB.

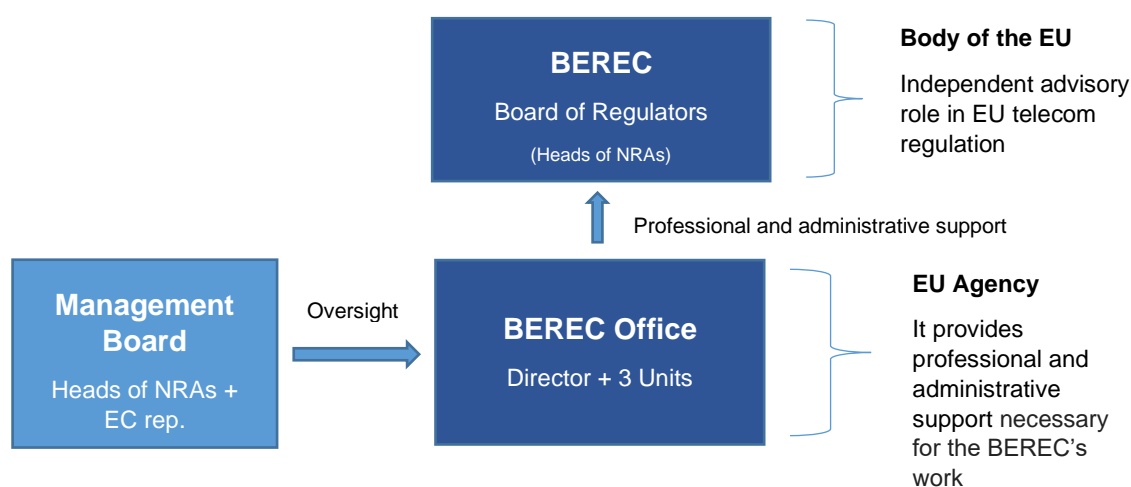


Figure 1: Structure of BEREC and the BEREC Office

2. Definition of fraud

For the purposes of this AFS, fraud is defined in line with Union law as *any intentional act or omission involving deception or misrepresentation with the aim of obtaining an undue advantage*, thereby harming or putting at risk the Union's financial interests or undermining the integrity of the Agency. Intention is the key element distinguishing fraud from a non-fraudulent irregularity; by contrast, irregularities may result from genuine errors and do not involve intent.

Fraud differs from error in that it requires *intent*: deception and the prospect of gain must be present. The so-called fraud triangle, illustrated in Figure 2, depicts the main enabling factors: **opportunity** (weak or poorly enforced controls), **pressure/motivation** (financial or personal incentives), and **rationalisation** (perceiving the act as harmless or justified).

⁸ [European Electronic Communications Code | EUR-Lex](#)

The scope of the Strategy reflects the Union legal framework and covers all intentional acts and omissions that may harm the Union's financial interests or the reputation and integrity of the Agency. It encompasses:

- (i) Fraud, corruption and misappropriation defined in Directive (EU) 2017/1371 on the protection of the Union's financial interests ("PIF Directive")⁹;
- (ii) Intentional irregularities under Council Regulation (EC, Euratom) No 2988/95¹⁰; and
- (iii) Breaches of professional obligations subject to investigation under Regulation (EU, Euratom) No 883/2013¹¹ on investigations conducted by OLAF.

The notion of fraud also extends to other forms of misconduct such as forgery, concealment of material facts, breaches of IT systems or cyber fraud, unauthorised disclosure of confidential information, and practices undermining integrity including favouritism, collusion or undeclared conflicts of interest.

Fraud may take the form of internal or external misconduct, including acts by staff members, members of the Board of Regulators or the Management Board, as well as contractors, service providers or other third parties involved in BEREC and BEREC Office operations. It may also result from undue influence or attempts by external actors, for example through lobbying, manipulation, misuse of confidential information or unauthorised disclosure.

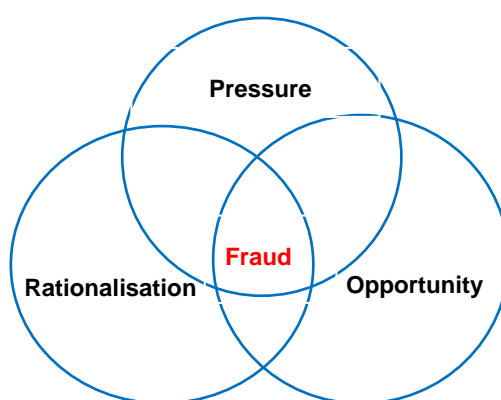


Figure 2: The three main enabling factors of fraud

⁹ [Directive \(EU\) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law](#)

¹⁰ [Council Regulation \(EC, Euratom\) No 2988/95 of 18 December 1995 on the protection of the European Communities financial interests](#)

¹¹ <https://eur-lex.europa.eu/eli/reg/2013/883/oj/eng>

3. Means and resources

The effectiveness of the AFS relies on a robust control environment defined by internal rules, allocation of responsibilities and oversight arrangements, and is supported by preventive, detective and corrective measures. The BEREC Office, as an EU agency, operates in line with the Financial Regulation and the Staff Regulations, while BEREC, as a Union body, applies the provisions of the BEREC Regulation concerning independence, impartiality and confidentiality. In combination, these frameworks provide a sound basis for addressing fraud risks at both levels.

3.1 BEREC Office controls

The BEREC Office has established an anti-fraud framework with clearly defined roles and responsibilities, supported by controls integrated into daily operations. **The Management Board** (MB) adopts an AFS proportionate to the identified fraud risks taking into account costs and benefits, and ensures follow-up on audit and evaluation findings including OLAF investigations. **The Director** prepares the strategy and is responsible for its implementation. The **BAG** reviews the Agency's procedures and controls for fraud prevention and may advise on the follow-up to OLAF investigations. Heads of Unit and Team Leaders apply controls in their respective areas (procurement, HR, finance, ICT, etc.), while the Anti-Fraud Officer¹² coordinates the preparation of the AFS, as well as fraud-risk assessment, awareness and reporting activities. The Internal Control Coordinator¹³ (ICC) ensures alignment with the annual risk assessment, and all staff of the BEREC Office must comply with ethical, conflicts of interest and confidentiality obligations.

The main Agency controls are presented in two tables, respectively for spending activities and non-spending activities, indicating the competent services and responsible actors for their implementation.

The tables below present a high-level overview of the key controls in place at the BEREC Office. They do not replace detailed procedures set out in the applicable internal rules and guidelines.

¹² The function is assigned to the Legal Officer at the BEREC Office, who, among others, is responsible for coordinating the cooperation with OLAF, monitoring the compliance with antifraud rules, providing advice on the relevant activities in the field of fraud prevention and monitoring the implementation of the Agency's anti-fraud strategy.

¹³ The function is assigned to the Finance and Accounting Team Leader and has been established in line with the provisions of Article 45 (2) of the BEREC Office Financial Regulation to provide an expertise and advice to the authorising officer to help him or her control the risks involved in his or her activities.

Table 1: Controls in spending activities

Area	Rules/Policies	Controls in practice	Responsible actor(s)
Procurement	Financial Regulation, EC Vademecum, BEREC Office procurement manual	All procedures follow the Financial Regulation; controls are implemented through the Public Procurement Management Tool, with ex ante legal verification and ex post checks for high-risk procedures.	Procurement Officers; Legal Officer; Director
Financial Management	Financial Regulation, Financial circuit, BEREC Office Financial Manual	Segregation of duties in financial circuits; ex ante checks before commitments/payments; budget monitoring; ex-post reviews	Director; Responsible Authorising Officers (RAOs); Accounting Officer; operational and financial verifying agents
Audit	FFR, Financial Regulation, BEREC Office Financial Regulation	Annual audits by ECA and independent auditor; systematic follow-up of recommendations	Director; RAOs; Accounting Officer

Table 2: Controls in non-spending activities

Area	Rules/Policies	Controls in practice	Responsible actor(s)
Conflict of interest (Col)	Decision on Col for staff members ¹⁴ , Guidelines on Col for staff involved in selection, recruitment or reclassification ¹⁵ , policy on Col for MB members	Col declaration for newcomers, Col declaration of members of the Selection Committees and Joint Reclassification Committee	Entity in charge of HR, Legal Officer, line managers, Authority authorised to conclude contract of employment (AACC), MB
Reporting of fraud	Guidelines on whistleblowing of the BEREC Office ¹⁶	Confidential reporting channels; protection of reporting persons; independent follow-up	Director; Anti-Fraud Officer
Exception reporting	Register of exceptions and non-compliance cases	Recording and review of exceptions; corrective action where needed	Director; ICC
Information and personal data protection	Information Security Rules ¹⁷ ; Internal Decision on IT security ¹⁸ , Implementing rules on data protection ¹⁹	Access rights management, monitoring of system use, regular security updates, Records of processing operations, DPIAs, and staff awareness measures	ICT Team; Local Security Officer; Data Protection Officer

¹⁴ [MB \(25\) 59 Draft Decision of the BEREC Office Management Board \(MB\) setting out ethics rules and rules on the prevention and management of conflicts of interest in respect of the staff members of the BEREC Office](#)

¹⁵ Adopted by Decision of the MB Vice-Chairperson, Ares(2018)5812320 - 14/11/2018

¹⁶ [Guidelines on whistleblowing of the BEREC Office](#)

¹⁷ Internal Administrative Instruction (IAI/2017/01)

¹⁸ [BEREC Office MC Decision concerning the decision on IT security](#)

¹⁹ [Decision No MB/2019/14 of the Management Board adopting implementing rules on data protection](#)

3.2 BEREC controls

With a view to safeguarding BEREC's independence and integrity when advising on telecommunication legislation, the legislator has paid particular attention to the following aspects:

- **Independence and impartiality:** The BEREC Regulation explicitly requires BEREC to perform its tasks in full independence and impartiality; Article 3(3) and Article 8.
- **Conflict of interest:** To safeguard BEREC independence and impartiality, members of the Board of Regulators (BoR) are subject to conflicts of interest rules, as set out in Article 42 of the BEREC Regulation and further detailed in the dedicated policy on handling conflict of interest of BoR members.²⁰

Initial declaration of interest: At the start of their mandate, members of the BoR must submit written declarations of interests indicating any commitments or circumstances that could prejudice their independence. These declarations must be accurate, complete, updated as necessary, and made public on the BEREC website along with the CV of the BoR member concerned.

Declaration at meetings: At the start of each meeting, BoR members, working group members and any participants in their meetings are required to declare any interest relevant to the items on the agenda and must abstain from participating in discussions or voting where such interests exist.

Similar rules²¹ apply to members of the MB and participants in MB meetings, but with a different scope: they address conflicts of interest in relation to the supervisory and administrative role of the MB over the BEREC Office, rather than BEREC's regulatory activities.

In addition, members of the BoR, the MB and the Working Groups act as representatives of their respective NRAs. When performing their functions within BEREC/BEREC Office, they are subject to the conflict of interest and integrity rules established under the BEREC Regulation and related policies. At the same time, as public officials of their NRAs, they remain bound by their national codes of conduct and ethical frameworks, which complement the BEREC-level safeguards while differing in scope and context of application²².

- **Confidentiality and security of information:** Article 38 of the BEREC Regulation prohibits BEREC and the BEREC Office from disclosing information for which confidential treatment has been requested and requires BoR members – like MB members, working group participants, the Director, SNEs and other staff not employed

²⁰ [Decision No BoR/2019/07 of the Board of Regulators of the Body of European Regulators for Electronic Communications \(BEREC\) laying down rules on preventing and managing conflicts of interest concerning the members of the Board of Regulators](#)

²¹ [Decision No MB/2019/16 laying down rules on preventing and managing conflicts of interest concerning the members of the Management Board](#)

²² For example, members of the Italian Autorità per le Garanzie nelle Comunicazioni (AGCOM) are subject to the [Authority's Code of Conduct, adopted pursuant to Law No 190 of 2012 on the prevention of corruption, which sets out detailed rules on integrity, independence and conflicts of interest](#).

by the BEREC Office – to comply with confidentiality obligations under Article 339 TFEU, even after their duties have ceased. Article 39 requires BEREC and the BEREC Office to adopt security rules equivalent to those of the European Commission for the protection of EU Classified Information and sensitive non-classified information, including rules on exchange, processing and storage.

Although the likelihood of misconduct of BEREC members, such as a breach of conflicts of interest obligations or the unauthorised disclosure of confidential information, is considered low, the potential impact on BEREC's reputation and perceived independence would be significant given its role as an impartial advisory body. The above safeguards therefore play a central role in protecting BEREC's integrity and in shaping the overall control environment within which the BEREC Office Anti-Fraud Strategy operates.

3.3 External cooperation

OLAF, acting under Regulation (EU, Euratom) No 883/2013,²³ conducts administrative investigations into suspected fraud or other irregularities affecting the Union's financial interests. Where applicable, the European Public Prosecutor's Office, established by Council Regulation (EU) 2017/1939²⁴, investigates and prosecutes criminal offences against those interests. The European Commission Directorate-General for Communications Networks, Content and Technology (DG CONNECT), as the partner Directorate-General of the BEREC Office, is informed of significant fraud-related matters that may affect the assurance it derives from the Agency as its entrusted entity. These external functions complement and reinforce the Agency's internal control system described above.

4. Implementation and evaluation of the Anti-Fraud Strategy 2023–2025

The evaluation of the 2023–2025 Anti-Fraud Strategy²⁵ confirms that the BEREC Office implemented all planned actions in line with its objectives.

- **Under Objective 1 (Fraud prevention in the IT working environment):** key measures were implemented to minimise the Agency's exposure to cybercrimes by strengthening the protection of its IT systems and data. These included the adoption of an anti-phishing framework, staff awareness training, and reinforced cooperation with CERT-EU on responding to cyber-threats targeting EU institutions. Regular reviews of access rights and the deployment of security tools on corporate devices were also carried out. Together, these measures significantly enhanced the Agency's resilience against phishing, malware, cyber fraud and other IT-related threats.
- **Under Objective 2 (Ethical behaviour of staff and BEREC members):** awareness-raising actions were systematically implemented to promote the values of ethics and

²³ [Regulation \(EU, EURATOM\) No 883/2013](#)

²⁴ [Regulation - 2017/1939 - EN - EPPO - EUR-Lex](#)

²⁵ [Decision No MB/2023/04 of the Management Board of the Agency for Support for BEREC \(BEREC Office\) on the Anti-Fraud Strategy 2023-2025](#)

integrity among staff and BEREC members. For staff, the BEREC Office deployed the Ethics module in Sysper²⁶ and organised targeted ethics and integrity training sessions, complemented by reminders and mandatory induction training for newcomers. For BEREC members, the Anti-Fraud Officer delivered dedicated ethics and conflict of interest presentations during Contact Network and Management Board meetings,²⁷ supported by awareness material shared via internal communication channels and the Director's newsletter. These actions strengthened awareness of ethical standards and reinforced a culture of integrity across staff and members.

5. Fraud-risk assessment

The fraud-risk assessment, carried out in September 2025 in line with the methodology established by OLAF²⁸, aimed to identify key risks, assess their likelihood and impact, and propose mitigating actions for the Director's consideration. It was conducted under the current institutional framework, where BEREC issues non-binding opinions and the BEREC Office does not take part in BEREC's decision-making. In the event that new binding powers or responsibilities are introduced following a review of the BEREC Regulation, the Agency's fraud-risk exposure will be reassessed. Accordingly, the Strategy provides for an annual review of the fraud-risk assessment, as set out in Action 4.2 of the Action Plan (Annex), to ensure its continued validity and relevance.

The assessment, based on questionnaires and a dedicated workshop, examined both spending activities (procurement and financial management) and non-spending activities (HR processes, management of sensitive information, support to BEREC). While risks from lobbying were considered limited, discussions underlined the importance of controls on sensitive non-classified information (e.g. confidential operator data, internal documents) and to maintain continued attention to ethics and integrity. Procurement and financial management were considered lower risk given the Agency's small budget and positive audit record.

Overall, the assessment confirmed that the Agency's exposure to fraud is low and highlighted two areas requiring preventive measures: (i) the management of sensitive non-classified information (SNCI)²⁹ and (ii) ethics and integrity.

The list of specific risks identified as requiring mitigation is available in the Action Plan at the end of this document.

²⁶ the European Commission's HR management system used by EU institutions and agencies; its Ethics module supports declarations and ethics workflows

²⁷ [See the conclusions of the 59th Ordinary Plenary Meeting of the BEREC Office Management Board \(MB\) which reflected the dedicated session on ethics and conflict of interest delivered by the BEREC Office Anti-Fraud Officer.](#)

²⁸ 2024 OLAF's Methodology and guidance for the Anti-Fraud strategies of the EU Decentralised Agencies and Joint Undertakings

²⁹ Sensitive non-classified information (SNCI) is information not subject to EUCI rules but still requiring protection against unauthorised disclosure (cf. Article 39 of Regulation (EU) 2018/1971).

The level of each risk is expressed qualitatively (low, medium, or high), based on the combination of likelihood and impact, in line with the European Commission's Internal Control principles and risk-assessment methodology. For confidentiality reasons, the underlying numerical scoring is kept internal.

6. Objectives

On the basis of the 2025 fraud-risk assessment, the Agency has formulated four operational objectives, which are translated into concrete actions in the Action Plan:

1. **Safeguard confidentiality and integrity of information** – strengthening safeguards against leakage or misuse of sensitive non-classified information, in particular confidential operator data and internal documents.
2. **Ensure integrity of BEREC Office staff** – ensure awareness and consistent application of ethics and conflict of interest obligations.
3. **Ensure integrity of BEREC members** – fostering ethical conduct and compliance with independence and conflict of interest rules among members of the Board of Regulators and the Management Board.
4. **Strengthen fraud prevention across the Agency** – building a culture of prevention through annual risk assessments, effective reporting channels and transparency.

The detailed actions, responsibilities and timelines for achieving these objectives are set out in the Action Plan included in the Annex to this document.

7. Review and monitoring

The Director, supported by the Anti-Fraud Officer, is responsible for the implementation and monitoring of the Strategy. For this purpose, the Director will ensure:

- **Annual assessment:** In accordance with Article 32 of the BEREC Office Financial Regulation³⁰, the Strategy will be assessed annually and updated as necessary.
- **Periodic evaluation and update:** Every three years, the Strategy will be subject to review and update to ensure its continued relevance and effectiveness, taking into account developments in legislation, best practices and any institutional or organisational changes affecting the BEREC Office or BEREC.
- **Fraud-risk assessment update:** On an annual basis, the fraud-risk assessment will be reviewed within the framework of the Agency's overall risk-management process, with a view to confirming its continued validity and introducing updates where material changes are identified.

³⁰ [Decision No MB/2019/13 of the Management Board of the BEREC Office on the financial regulation applicable to the BEREC Office](#)

- **Performance monitoring:** The implementation of the Strategy will be monitored through a set of key performance indicators, including the following:
 - cases notified to OLAF;
 - cases dismissed by OLAF;
 - internal reports of suspected misconduct.

Results will be reported annually in the BEREC Office Consolidated Annual Activity Report, ensuring transparency and accountability to the Management Board and other stakeholders.

8. Awareness

The BEREC Office will ensure that the Anti-Fraud Strategy and the results of its implementation are effectively communicated to staff, BEREC members and other relevant stakeholders through appropriate internal channels. The Strategy and related documentation will be made available on the Agency's website and shared-drive, accompanied by targeted information notices and management messages highlighting key principles and responsibilities. Awareness will be further promoted through regular training and induction sessions, as well as through the inclusion of Anti-Fraud topics in staff meetings. The Anti-Fraud Officer will provide periodic updates to the Director on implementation progress and lessons learned. These measures aim to foster a culture of integrity, transparency and accountability across all levels of the organisation.

9. Conclusion

The BEREC Office upholds a zero-tolerance approach to fraud and is committed to protecting the Union's financial interests pursuant to Article 325 TFEU. Within the Agency's internal control framework, this Strategy addresses the identified residual risks and sets out the operational objectives and actions to mitigate them. It also supports BEREC in maintaining the highest standards of integrity, independence and impartiality in the performance of its regulatory and advisory tasks. Awareness and communication activities will further promote these principles by ensuring that staff and BEREC members remain informed of their responsibilities under this Strategy through targeted training and internal communication. The BEREC Office will continue to cooperate fully with OLAF and, where applicable, with the European Public Prosecutor's Office (EPPO) to ensure the effective prevention, detection and follow-up of fraud and irregularities.

The present Strategy is annexed to the Management Board Decision³¹ adopting it and will apply from the date of that Decision.

Adopted by Management Board Decision No MB/2025/71 of 5 December 2025

Entry into force: 5/12/2025

³¹ Decision No MB/2025/71 of the Management Board of the Agency for Support for BEREC on the Anti-Fraud Strategy 2026-2028

Annex - Action Plan for the BEREC Office Anti-Fraud Strategy 2026–2028

This Action Plan translates the operational objectives of the Anti-Fraud Strategy into specific actions, responsible actors and indicative timelines for their implementation and monitoring.

No	Risk	Risk level	Action	Responsible	Indicator			Deadline
					Description	Base line	Target value	
Objective 1								
To safeguard confidentiality and integrity of BEREC and BEREC Office information								
1.	Risk of leakage or misuse of sensitive information for fraudulent purposes or personal gain Leakage or misuse of sensitive information due to outdated rules, lack of proper marking/classification, low awareness or technical weaknesses, leading to undetected fraud, misuse of financial resources, breaches of confidentiality obligations and reputational damage	Low to Medium	1.1 Ensure that BEREC and the BEREC Office security rules for handling sensitive non-classified information are updated (replacing the 2017 IAI) and formally adopted by MB decision, in line with the BEREC Regulation.	Local Security Officer (LSO)	<i>MB decision adopting updated security rule</i>	<i>No updated security rules formally adopted (2017 IAI still in place)</i>	<i>New security rules adopted by MB decision</i>	By the end of 2026
			1.2 Establish internal procedures for the reporting and escalation of suspected leaks or misuse of sensitive information, specifying designated contact points and follow-up arrangements.	LSO in cooperation with the Anti-Fraud Officer	<i>Procedure adopted (Y/N)</i>	<i>No formalised procedure</i>	<i>Procedure adopted</i>	Q4 2026

No	Risk	Risk level	Action	Responsible	Indicator			Deadline
					Description	Base line	Target value	
			1.3. Regularly review and enforce access rights to sensitive information, ensuring that only authorised staff and members have access in line with their functions.	LSO in cooperation with ICT	Percentage of access rights reviewed annually	Ad hoc reviews	100% annual review	Once per year after the new rules (1.1) and operation procedure (1.5) are in place
			1.4. Conduct targeted awareness sessions for staff and BEREC members on fraud risks linked to information misuse.	LSO/Anti-Fraud Officer	Number of sessions held/year;	0 sessions/year	At least one each year	Annually
			1.5 Define clear operational procedures for processing and exchanging sensitive information in internal workflows, with appropriate safeguards to prevent misuse or unauthorised disclosure.	To be designated by the Director within 3 months after the adoption of the AFS	Procedure adopted Y/N;	No mapped workflows	Procedure adopted and workflows mapped	By the end of 2027

No	Risk	Risk level	Action	Responsible	Indicator			Deadline
					Description	Base line	Target value	
Objective 2								
To ensure integrity and ethical conduct of BEREC Office staff								
2.	Risk of misconduct or unethical behaviour by BEREC Office staff, including conflict of interest Misconduct or unethical behaviour by BEREC Office staff, including conflicts of interest, due to insufficient awareness or weak enforcement of rules, leading to reputational damage and loss of trust in the Agency's integrity.	Low to Medium	2.1 To ensure the awareness of BEREC Office staff via information sessions or dissemination of information	Entity in charge of HR in cooperation with Anti-Fraud Officer	Number of ethics/anti-fraud information sessions delivered;	0 sessions	At least once per year	Annually
			2.2 To ensure consistently compliance with the Col rules, including collection and review of declarations prior to taking up duties	Entity in charge of HR	% of newcomers submitting declarations	100% of newcomers No statistics available for the staff in active employment	Maintain 100% compliance for newcomers and establish monitoring for staff in active employment.	Before the start of assignment – for newcomers. When needed for all staff

No	Risk	Risk level	Action	Responsible	Indicator			Deadline
					Description	Base line	Target value	
Objective 3								
To ensure integrity and ethical conduct of BEREK members								
3.	Risk of misconduct or unethical behaviour by BEREK members Misconduct or unethical behaviour by BEREK member, including conflicts of interest, due to insufficient awareness or weak enforcement of rules, leading to reputational damage and loss of trust in the BEREK's integrity and impartiality.	Low to Medium	3.1 To organise awareness-raising session for the incoming BEREK Chair (and/or new MB, BoR members) on ethics, conflicts of interest and anti-fraud obligations	Anti-Fraud Officer	Session held for new governance (Y/N);	1 session held for the MB in 2024	1 per new governance	Once per year
			3.2 To provide dedicated material on ethics, conflicts of interest to all new BoR members (onboarding package).	Anti-Fraud Officer	Onboarding package delivered (Y/N)	Not systematic	100% of new members	Upon nomination of new members
			3.3 To facilitate and document the screening of the Col declarations and CVs of the BoR/MB members and Participants without voting rights by the Chair(person) and Vice-Chair(person) in line with the respective procedure in place.	Board Support Team	Percentage of BoR/MB members declarations screened	Partial coverage	80%-	Upon submission of new declarations of interest

No	Risk	Risk level	Action	Responsible	Indicator			Deadline
					Description	Base line	Target value	
Objective 4								
To strengthen fraud prevention within the Agency								
4	Risk of failure to detect or mitigate fraud vulnerabilities in key processes leading to undetected fraudulent behaviour.	Medium	4.1 To conduct tailored anti-fraud awareness sessions for BEREC Office staff, mandatory for high-risk job profiles (e.g. procurement, HR, finance, IT)	Anti-Fraud Officer	<i>Number of sessions for high-risk profiles / year</i>	<i>0 sessions</i>	<i>At least once per year</i>	Once per year
	Failure to detect fraud vulnerabilities in key processes, due to low awareness, weak controls or gaps in risk assessment, leading to undetected fraud, financial loss and reputational damage.		4.2 To conduct an annual review of the fraud-risk assessment as part of the annual risk assessment, confirming its validity and updating it where material changes occur	Internal Control Coordinator	<i>Annual review performed (YES/NO)</i>	<i>No systematic annual review of fraud risk assessment</i>	<i>One review per year</i>	By October each year at the latest
5	Risk that suspicious of fraud or misconduct are not reported or follow up	Low to Medium	5.1 To implement whistleblowing policy by creating and maintaining a confidential internal whistleblowing Register to log, monitor and follow up reports of suspected fraud or misconduct	Anti-Fraud Officer	<i>Register operational (Y/N)</i>	<i>No register</i>	<i>Register in force</i>	By Q4 2027
	Suspicious of fraud or misconduct are not reported or followed up due to low awareness, fear of retaliation or unclear							

No	Risk	Risk level	Action	Responsible	Indicator			Deadline
					Description	Base line	Target value	
	procedures, leading to unaddressed wrongdoing and reputational damage		5.2 To inform regularly the BAG, the partner DG and the MB on the situation at the Agency concerning fraud (for example, via the Consolidated Annual Activity report (CAAR) or other appropriate means)	Anti-Fraud Officer	<i>Updates provided annually in CAAR (Y/N)</i> <i>Number of reports/ briefings BAG/MB</i>	<i>Regular reporting in CAAR</i>	<i>Annual updates systematically provided in CAAR</i> <i>Reports/ briefings provided in case of investigations by OLAF</i>	By June each year at the latest When needed