Case studies
Conflict of interest

Case 1

You cross-checked the names in the monitoring system and discovered that the legal representative of the Lead Partner and the finance manager share the same surname. Upon inquiry, they explained that they are a married couple. They believed that such information is sensitive and protected under GDPR and therefore did not feel obliged to disclose details of their private life.

Is there a CoI?

What would you do?

Would you treat this case as suspected fraud and report it?

Case 2

You ask the partner to provide a list of persons involved in the project who are able to take financial decisions. The partner explains that their institution has an anti-fraud policy in place, which includes provisions on conflicts of interest, and that all employees are required to sign a declaration confirming the absence of any conflict of interest. They provide you with the updated and signed declarations of all staff involved in the project.

Do you rely on these declarations, or do you decide to verify their accuracy?

If you decide to verify the declarations, how would you carry out such checks?

Case 3

A project partner launched a public procurement procedure worth EUR 450 000 for the supply of specialised equipment. The contract was awarded to Company X.

Several months later, you do the Arachne+ upload and it emerges that one of the members of the partner's board, who participated in discussions approving the procurement process, indirectly owns 30% of Company X through another legal entity. The board member had signed an annual declaration stating that no conflicts of interest existed and did not disclose this ownership interest.

The procurement file contains no evidence that the board member declared the interest or abstained from the decision-making process.

Is there a perception of CoI?

What would you do with this contract?

Case 4

The Managing Authority receives information from a whistleblower concerning the project you supervise. The whistleblower alleges that the Monitoring Committee member is politically related to the legal representative of the partner and the project was weak, but it constituted a political favour.

You recall that you verified the absence of conflict of interest declarations during MC meeting, and they appeared to be properly completed – no conflict had been declared.

What would you do?

Case 5

You find out that one of your colleagues is invited to the kick off meeting by the Lead Partner. The Lead partner pays your colleague for a business class flight, and the 4-day stay in a very expensive 5-star hotel with full-board included.

What would you do?

Case 6

The financial manager of the of the Lead Partner left their position and took a lucrative job with a company that had been awarded a subcontract in a public procurement procedure.

You ask the lead partner's representative whether they have a revolving door policy in place. They reply that they do not have such a policy and that employees are free to leave and pursue any career opportunities they choose.

What would you do?

Case 7

You discovered that the public procurement specialist in the Interreg project (Contracting authority) awarded a contract to a one-man company offering publicity services. Upon further investigation, you noticed that the specialist and the owner of the company share the same surname. When asked for clarification, it was revealed that the specialist awarded the contract, valued at 20,000 EUR (below the EU and national threshold), to his wife, who owns the one-man company.

Is there a perception of CoI?

What would you do with this contract?