

Managing Procurement Fraud Risk through Continuous Monitoring: A Case Study

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IS PROCUREMENT FRAUD SIGNIFICANT?

The reality, unfortunately, is that no organisation is immune to fraud and corruption, particularly in its procurement cycles. The reputational and financial consequence is often disastrous.

Almost every survey conducted and statistical trend reported indicates that not only is the frequency of procurement fraud and corruption on the increase, but the quantum of losses is becoming significant enough to affect the sustainability of organisations.

"Deloitte. - Oct 2014"

WHAT IS CONTINUOUS FRAUD MONITORING?

Continuous – Without interruption. Don't send the guard home. Ever.

FRAUD- intentional perversion of truth in order to induce another to part with something of value – Merriam-Webster 2016

ERROR - an act involving an **unintentional** deviation from truth or accuracy – *Merriam-Webster 2016*

Detection - the action or process of identifying the presence of something **concealed** - Google

Procurement Business Processes

- Purchase Request
- Request for supplier quote
- Supplier quotes received
- Quote Adjudication
- Purchase order
- Goods Received
- Supplier Invoice Received
- Supplier payment

Procurement Business Processes	Fraud Risk
Purchase Request	Unauthorised request
Request for supplier quote	 Not requested from valid suppliers
Supplier quotes received	Quote manipulation
Quote Adjudication	Unfair adjudication
Purchase order	 Unauthorised changes to PO
• Goods Received	Goods not received but recorded
Supplier Invoice Received	• Invoice received for goods not received
Supplier payment	Payment to invalid supplier

Procurement Business Processes	Fraud Risk
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	 Invoice received for goods not received
	Payment to invalid supplier

THE BIG QUESTION: WHAT TO MONITOR

All data tables contain the same building blocks

- Key / Unique identifiers
- Text fields
- Numeric fields
- Date fields

Determine what fields are available in your data

Link risk to data and decide what to monitor

Data Building Block	Quote manipulation
Key / Unique identifiers	 RFQ number Supplier quote number Supplier number Product code
Text fields	Supplier nameProduct description
Numeric fields	QuantityPrice
Date fields	 Date of RFQ Date of quote Time of quote

SETTING THE SCENE

- √ Manufacturing industry
- ✓ Concern that supplier quotations are manipulated
- ✓ Potential financial loss due to uneconomical purchasing
- ✓ Evidence based upon rumours and tip offs
- ✓ Internal collaboration suspected
- ✓ Management needs to stop losses
- √ Forensic needs tool to support investigations

CATCHING A THIEF



SUSPECTED MODUS OPERANDI

Request for quotations are emailed to suppliers on the supplier database

Each email contains unique pin to access online quote system Pin's are harvested internally and sold to one of the suppliers Minutes before quote closes "bad" supplier increases competitor quotes

Adjudicators select lowest quote and "bad" supplier wins

 Secure Online Quoting System PIN used to log into online quoting system PIN's harvested from mail server Changes made or quotes captured after 23:30 on night before quote closes Adjudicators don't see deleted quotes

CHARACTERISTICS OF QUOTE TAMPERING (RISK RATING)

1

Quotes captured after 23:30 on night before closure 2

Multiple Quotes captured from same IP address 3

Winning quote higher than any deleted quote 4

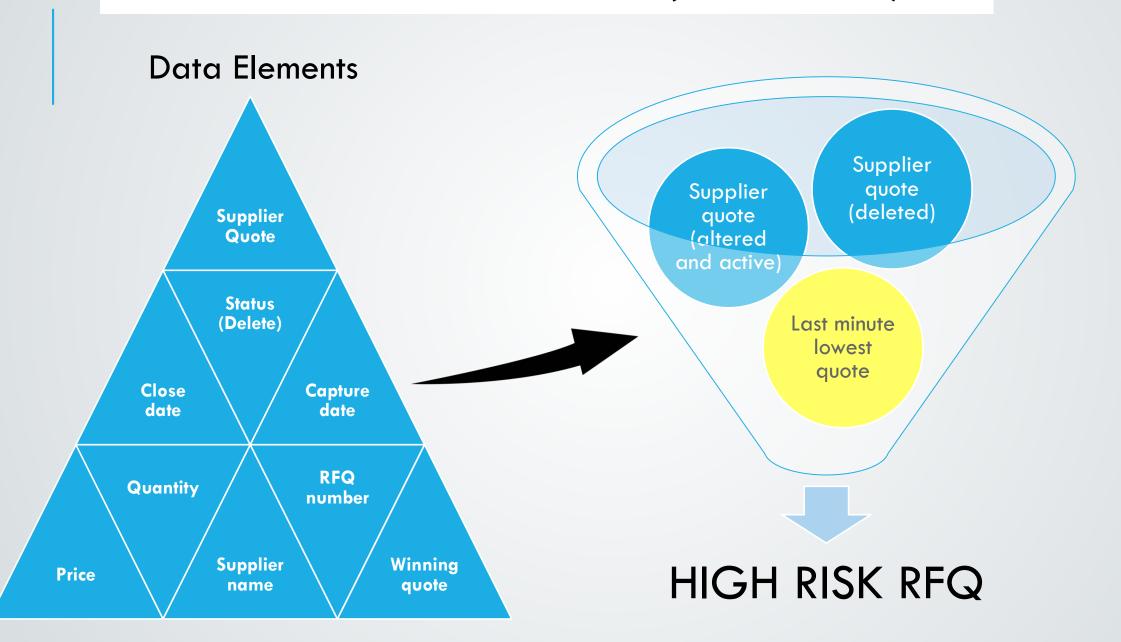
Any quote increased by more than 50%

5

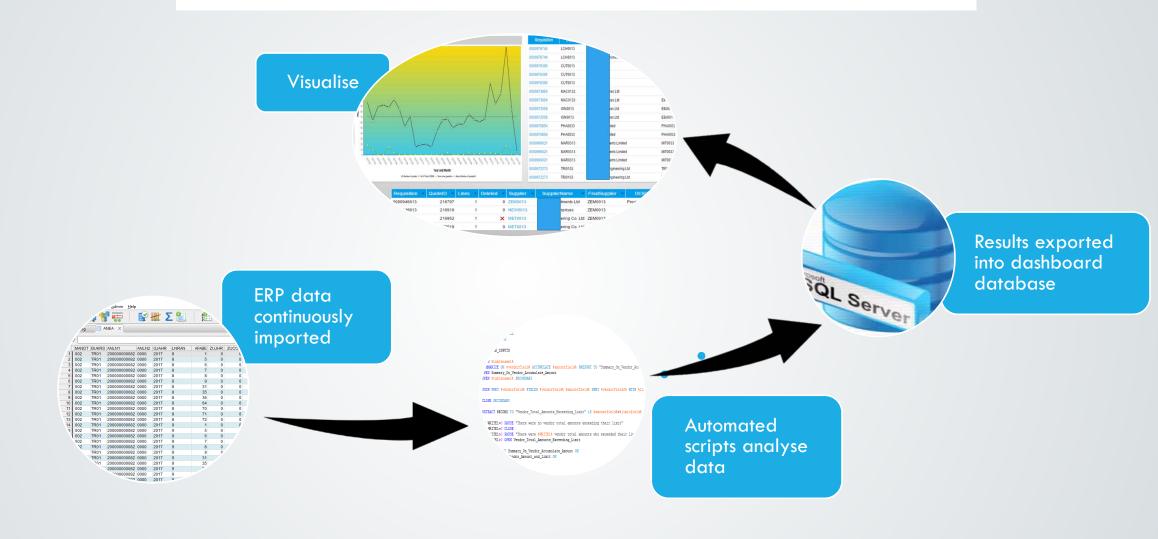
Quote from suspected "BAD" supplier (predictive analytics) 6

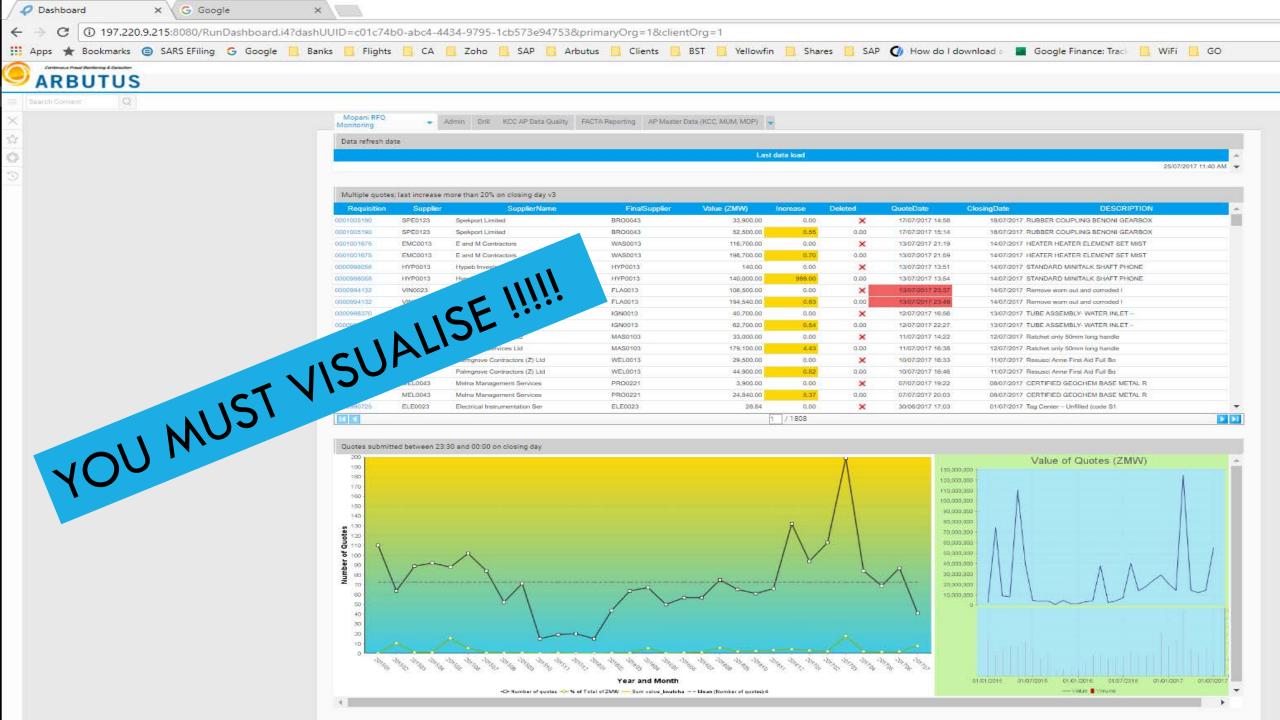
Lowest Price for item 50% higher than average 12 months

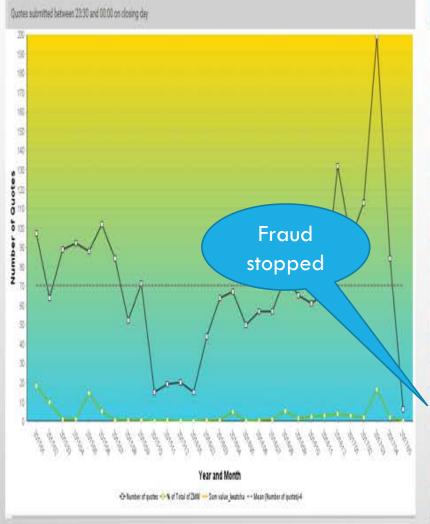
MONITOR UNIVERSE- RFQ (NOT QUOTE)



FLUSTERING FRAUD OUT OF THE SHADES







Requisition	Supplier	SupplierName	FinalSupplier	Value (ZMW)	Increase	Deleted	QuoteDate	ClosingDate
0000976744	LCH0013	hishers	KAT0083	190.00	0.00	×	03/05/2017 20:02	04/05/2017
0000976744	LCH0013	hishers	KAT0083	190,000.00	999.00	0.00	03/05/2017 20:11	04/05/2017
0000976395	CUT0013		WAS0013	38,651.08	0.00	×	02/05/2017 17:41	03/05/2017
0000976395	CUT0013		WAS0013	76,584.30	0.98	0.00	02/05/2017 17:44	03/05/2017
0000976395	CUT0013		WAS0013	76,584.30	0.00	0.00	02/05/2017 17:48	03/05/2017
0000973854	MAC0133	ses Ltd	EMC0013	19,321.95	0.00	X	02/05/2017 19:21	03/05/2017
0000973854	MAC0133	ses Ltd	EMC0013	181,359.65	8.39	0.00	02/05/2017 19:25	03/05/2017
0000972558	IGN0013	ies Ltd	EBJ0013	30.00			721:32	03/05/2017
0000972558	IGN0013	ies Ltd	EBJ0013	40,000.00		Foren		03/05/2017
0000970854	PHA0033	ited	PHA0033	150.00	'	working	tool	21/04/2017
0000970854	PHA0033	ited	PHA0033	1,500.00	,00	0.00	18/04/2017 17:32	21/04/2017
0000969021	MAR0313	ents Limited	MIT0033		0.00	X	20/04/2017 9:30	21/04/2017
0000969021	MAR0313	ents Limited	MIT0033	9,000.00	3.74	0.00	20/04/2017 20:04	21/04/2017
0000969021	MAR0313	ents Limited	MIT0033	2,000.00	-0.78	0.00	20/04/2017 23:54	21/04/2017
0000972273	TRI0103	ngineering Ltd	ID VO	21,051.20	0.00	X	18/04/2017 17:00	19/04/2017
0000972273	TRI0103	ngineering Ltd	TRI0103	54,208.48	1.58	0.00	18/04/2017 17:08	19/04/2017

Requisition	QuoteID	Lines	Deleted	Supplier •	SupplierName	FinalSupplier	DESCRIPTION	QuoteDate -	ClosingDate	Amount
0000946613	216797		1	0 ZEM0013	tments Ltd	ZEM0013	Provide service to Supply, Ins	06/03/2017 17:49	07/03/2017	102,415.00
0000946613	216910		1	0 NEW0013	rprises	ZEM0013	Provide service to Supply, Ins	06/03/2017 22:20	07/03/2017	287,888.96
0000946613	216952		1	X MET0013	ering Co. L	td ZEM0013	Provide service to Supply, Ins	06/03/2017 22:51	07/03/2017	47,108.54
0000946613	217019		1	0 MET0013	ering Co. L	td ZEM0013	Provide service to Supply, Ins	06/03/2017 23:55	07/03/2017	950,750.00

RESULTS

Fraud stopped in its tracks

Projected excess of R 100m saved during next year

Projected excess of R 100m saved during next year

Various forensic investigations out to 2 additional organisations in progress

group

LEARNINGS

Speak to the man on the ground. Slowly \odot

Don't walk away until you understand the man (DO you understand????)

Data building blocks. They're always there!

Golden trends

Keep queries simple. Get there and improve as you go along

Know your user. Little more effort add many more users

Picture tells a 1000 words. Never been more true.

RISKS OF FAILURE

INTERRUPTIONS!!!!!! (So unnessary)

WHAT is hidden. You need to know your risks and your business!! Stay in control; Don't expect IT to do everything!

EXPECT DISTRACTIONS. Remember fraud will be concealed. Don't get distracted!

HOW to place a spotlight on the concealed (Data blocks!)

Failure to **PLAN MOMENTUM**!!!!!!!

QUESTIONS?

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Typical Procurement Fraud Red Flags

- Poor or non-existent record-keeping
- Higher-price, lower-quality goods
- Excessive entertaining of procurement staff by suppliers
- Deviations in communications between procurement staff and suppliers, such as calls or text messaging to mobile phones
- Procurement staff demanding extended periods of notice before they allow an audit to take place
- Inexperienced buyers dealing with overbearing suppliers
- Buyers not taking leave for extended periods

- "After-hours" transactions
- Matching employee and vendor details
- Short-term changes to employee or supplier accounts
- Inappropriate authority to transact deals
- Conflicts of interest
- EFT transactions conducted without the appropriate approval

DESIGNING THE SOLUTION

Understand	Understand the risk
Analyse	Perform in-depth data analysis
Describe	Clearly describe the characteristics of the fraud
Мар	Map key data elements to fraud characteristics
Design	Design continuous data queries
Implement	Implement concise, interactive, user friendly Visualisation

