



Government of the Republic of Trinidad and Tobago
Minister of Public Utilities

MPU 1/13/18
PS/ASF/rs

January 16, 2017

Mr. Esmond Forde
Deputy Speaker
Parliament of the Republic of Trinidad and Tobago
Level G8 Tower D
The Port of Spain International Waterfront Centre
#1A Wrightson Road
PORT OF SPAIN

Dear Mr. Forde,

Re: First Report on the Public Administration & Appropriations Committee (PAAC)
on the Examination into Current Expenditure of Ministries & Departments under three (3)
Subheads: Current Transfers and Subsidies, Development Programme- Consolidated Fund &
Infrastructural Development

Reference is made to the matter at caption and to your letter dated December 5, 2016.

A report entitled *First Report of the Committee on the Public Administration & Appropriations Committee (PAAC)*” First Session of the 11th Parliament was laid before Parliament dated November 9, 2016.

Standing Orders 100(6) and 110(6) of the Senate and the House of Representatives respectively, require that the Minister with responsibility for the Ministry/ Body reported on by a Joint Select Committee to present to each House, a paper responding to the recommendation or / comments contained in the Committee Report. In accordance with the Standing Orders, please find enclosed the Ministry of Public

Utilities' submission in response to the observations or / recommendations detailed on pages 45 to 47 of the Report.

Please note that a soft copy of the Ministry's response was submitted via email on January 16, 2017.

Yours faithfully,



Fitzgerald E. Hinds
Minister



Public Administration & Appropriations Committee (PAAC)

First Report on the Public Administration & Appropriations Committee (PAAC) on the Examination of into Current Expenditure of Ministries & Departments under three (3) Subheads: Current Transfers and Subsidies, Development Programme- Consolidated Fund & Infrastructural Development Fund

The Ministry of Public Utilities' Responses to Issues, Observations & Recommendations

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1. INTRODUCTION

- 1.1. A report entitled the First Report of the Committee on Public Administration and Appropriations under three (3) Sub Heads: Current Transfers and Subsidies, Development Programme – Consolidated Fund and Infrastructural Development Fund was laid in the House of Representatives on November 9th, 2016 and in the Senate on November 15th, 2014.
- 1.2. Standing Orders 100 (6) and 110 (6) of the Senate and the House of Representatives respectively require the Ministry with responsibility for the Ministry/Body reported on by a Joint Select Committee to present to each House a paper responding to the recommendations/comments contained in the report.
- 1.3. In accordance with the above Standing Orders, the Water and Sewerage Authority (WASA), and the Trinidad and Tobago Electricity Commission in collaboration with the Ministry of Public Utilities have prepared a response on behalf of the Honourable Fitzgerald Hinds, Minister of Public Utilities, and the said response as contained in this paper is being submitted for the consideration of the House of Representatives and the Senate.

2. FRAUDULENT CHEQUES

2.1. OBSERVATIONS AND RECOMMENDATIONS OF THE COMMITTEE

Fraudulent Cheques

The Committee noted sixty-seven (67) fraudulent cheques were reported missing at the Water and Sewerage Authority (WASA) in early 2016. The Ministry of Public Utilities reported that the matter was being investigated by the police and one (1) person was arrested. As a consequence, the Ministry of Public Utilities mandated the crossing of all cheques which required cheques to be deposited rather than cashed, adding an additional layer of security.

Recommendation:

The Ministry mandates WASA to prepare a fraud policy with specific reference to prevent the preparation and issuing of fraudulent cheques at WASA. This policy must be approved by the Board for implementation by December 2016.

2.2. MINISTERIAL RESPONSE

- 2.2.1. The Water and Sewerage Authority (WASA) has an Anti-Fraud Policy that was approved by their Board on February 10, 2015.
- A copy of same has been annexed as **Appendix I**.

3. SUPPLY OF ELECTRICITY

3.1. OBSERVATIONS AND RECOMMENDATIONS OF THE COMMITTEE

The Committee noted that on the morning of May 1, 2016;

- Port of Spain and other areas across the country experienced a twenty (20) minute power outage.
- The cause of the outage was as a result of an issue affecting supply at the Trinidad Generation Unlimited (TGU) Power Plant.

The TGU Power Plant is a new plant that uses less gas in its operations and is capable of generating 720MW of power. The Trinidad and Tobago Electricity Commission (T&TEC) is prepared to commence using increased power from TGU Power Plant. There have been some minimal challenges as TGU increases its capacity to meet the 600MW demand from T&TEC. It was anticipated that there would be minimal technical challenges as T&TEC increased its transmission infrastructure to accommodate increased power supply from TGU, as the latter increases its generation to meet the 600MW demand from T&TEC.

Recommendations:

- ***The Ministry of Public Utilities:***
 - ***Ensures that all risks involved in the increased reliance on the TGU Power Plant are identified;***

- *Develops possible short-term mitigation strategies;*
- *Maximises distribution of the increased power.*

4. MINISTERIAL RESPONSE

4.1. RISK INVOLVED IN THE INCREASED RELIANCE ON THE TRINIDAD GENERATION UNLIMITED (TGU) POWER PLANT

There is an increased reliance on the Trinidad Generation Unlimited (TGU) power plant located in La Brea. This increase will see the Commission taking approximately 100MW additional capacity going up from 550MW to 650MW by February 2017. The risk associated with this large amount of power coming from a single power station positioned in the deep south to meet demands far up north into Port of Spain and western Trinidad are follows: -

1. The National Gas Company (NGC) gas supply to TGU is a single point of failure with no backup line for gas supply redundancy;
2. The TGU main shut off valve relies on the instrument air supply of the plant which presents the risk of failure and possible shutdown of the TGU Plant;

3. Some small degree of risk exists with gas conditioning systems to include but not limited to filtering and heating systems;
4. There exist a number of auxiliaries which support the steam generators which are fed from a common header which represents a common point of failure;
5. A number of programmable systems controlled by different servers are used to coordinate TGU's operations. These are required to operate in harmony. A small risk exists should time synchronization be lost between that satellite and GPS clocks.
6. Should one of the two (2) 220Kv lines leaving Union Substation trip, the grid would be unable to sustain loss of another line, but this risk is only limited to short periods of planned maintenance and short term emergencies;
7. There is the risk of low voltage otherwise called 'brown outs' to large sections of the country should significant

generation shortfall occur in the Pt Lisas area, as the TGU plant would not have the reactive power capability to sustain voltage requirements in the north of the island; and

8. There is a risk that there can be small pockets of load shedding should any of the steam turbines at TGU trip as the system would not have the spinning reserve capacity to fully replace and respond to the lost generation. This risk is relatively small and the disruption would hardly exceed a period of one (1) hour.

The above risk may not represent a comprehensive list but is foreseeable based on experience gained over the operation of the TGU power plant to date.

4.1.1. SHORT TERM MITIGATION STRATEGIES

T&TEC's short term mitigation strategies have been as follows:

1. T&TEC in collaboration with the management of TGU have made strides in improving the resilience of the instrument air system, as well as adjustments to the common systems on the steam plant which are expected to bring these risks to a minimum;

2. T&TEC has been informed of plans to provide a second source of natural gas to the TGU plant. TGU has made the necessary modifications to receive this alternative supply but T&TEC is unaware of NGCs' commitment for this most important mitigation initiative; and
3. With respect to the transmission grid T&TEC expects to have a new 265MVA 220/132kV transformer installed at Gandhi Village by February 2017 which mitigates for the loss of any similar sized transformer on the transmission interface between La Brea and Brechin Castle substation.

4.1.2. STRATEGIES FOR THE MAXIMISATION OF INCREASED POWER

Notwithstanding the risk and mitigation strategies outlined above T&TEC in an effort to maximize the distribution of TGU's capacity has ramped down the capacity required from PowerGen with the result that the Port of Spain Power Station has been closed for one (1) year resulting in savings of \$100,000,000 per year thus far. T&TEC has also invested in Gandhi Village substation which provides transformer capacity to have power injected into the grid at 132kV and a tender is in the process of being awarded to construct a second double circuit 220kV line from La Brea to Gandhi Village. This is expected to be completed in 2018 which would

enhance the resilience of the transmission system against line trips and system exposure during periods of planned maintenance.

5. ACCOUNTABILITY AND AWARENESS OF ASSISTANCE PROGRAMMES

5.1. OBSERVATIONS AND RECOMMENDATIONS OF THE COMMITTEE

The Committee noted the Ministry has three (3) assistance programmes:

- Solar Panel;
- Utility Bill, and
- Electrification Assistance

The programmes were ongoing, however, with seemingly little participation and awareness by citizens.

Based on the Committee's examination, the Ministry appears to have limited monitoring mechanisms in place to prevent fraud and abuse within these programmes.

Recommendations: The Ministry of Public Utilities should –

- ***Embark on a cost effective and aggressive public awareness campaign to ensure the widest possible use of the programme.***

- *Implements cost effective measures to ensure that the three (3) Assistance programmes are delivered efficiently.*

- *Collaborate with the Registrar General's Department of the Ministry of the Attorney General and Legal Affairs to ensure the provision of real time information on the death of persons benefitting from the utility assistance programmes.*

- *Conduct site visits to homes of beneficiaries.*

5.2. MINISTERIAL RESPONSE

5.2.1. The Ministry of Public Utilities (MPU) is responsible for the implementation of the following Assistance Programmes:

1. Utilities Assistance Programme (UAP) which consists of three (3) components:
 - a) Water Tank Assistance
 - b) Utilities Bill Assistance
 - c) Solar Panel Assistance

2. Residential Electrification Assistance Programme
(REAP)- House wiring and rewiring of homes.

3. Electrification Programme (National Grid Expansion)

5.2.2. The recommendation relative to the implementation of a cost effective and aggressive public awareness campaign to ensure the widest possible use of the Ministry's Social Programmes has been noted. In response the Ministry has prepared a Public Awareness Campaign Strategy for the period Fiscal 2017. A copy of the Public Awareness Campaign Strategy is annexed as **Appendix II**. The details of the Strategy in relation to each Social Programme are however discussed in the paragraphs below.

5.2.3. UTILITY ASSISTANCE PROGRAMME (UAP)

With reference to the Utilities Assistance Programme (UAP), the following recommendations are being implemented:

5.2.4. PUBLIC AWARENESS CAMPAIGN

The Ministry of Public Utilities intends to undertake the following initiatives:

1. **Advertisements-** The Ministry will embark upon an advertising campaign using various media such as radio, television and newspaper. In fiscal 2016, the MPU engaged in limited radio and newspaper advertisements.
2. **Public Outreach Campaigns-** The MPU will continue to conduct its public outreach campaigns throughout various communities in Trinidad and Tobago. For fiscal 2016, the MPU hosted two major events in the constituencies of Sangre Grande and Point Fortin. These events were advertised via newspapers, posters and town crier in local communities.
3. **Constituency Sensitization Training-** The MPU's constituency sensitization training sessions will continue throughout the various constituency offices. The initiative sought to provide detailed information on the various utility assistance programmes offered by the Ministry to assist such offices in better serving their constituents. In the fiscal 2016,

thirteen (13) training constituency training sessions were conducted across Trinidad and Tobago.

4. **Partnership with other Government Ministries and agencies** – The MPU intends to continue partnering with other Ministries such as the Ministry of Social Development and Family Services and Ministry of Community Development by participating on events that they host. The MPU participated in five such events in fiscal 2016.
5. **Infomercial-** The Ministry intends to utilize the television as a means of providing relevant information on particular aspects of the UAP such as the Solar Panel Assistance.
6. **Provision of MPU services on TTConnect** – the MPU intends to pursue the intention to have its Utility Assistance Programmes made available to the general public via the TTConnect platform. A draft MOU was developed in fiscal 2016, but placed on hold pending administrative changes within that agency.
7. **Social Media Presence-** The MPU will increase the use of its social media presence through continuous use of platforms such as the Ministry's website, Facebook page and Twitter account.

5.2.5. COST EFFECTIVE MEASURES FOR EFFICIENT PROGRAMME DELIVERY

1. The Ministry will continue to assess each UAP application according to the approved criteria outlined in the Utilities Assistance Programme Policy. Each applicant is required to submit valid national identification and proof of monthly household income in order to have their applications assessed.
2. All applications to the UAP's Bill Assistance facility is first assessed within the MPU against the socio-economic criterion to ensure only low-income applicants can benefit, before being sent to the relevant utility agency for assessment against the Customer Status criteria. The customer status verification seeks to ensure that only residential applicants with single active accounts can benefit. Also, in the case of the electricity subsidy, T&TEC verifies that the applicant's electricity usage is within the approved limit.
3. The Utility agencies, both WASA and T&TEC, provide monthly reports of customers who have died or who have changed their customer status in order to facilitate removal of such beneficiaries.

4. MPU officers conduct site visits to the homes of all Solar Panel and Water Tank Assistance applicants to verify all information provided.
5. The MPU's Technical Advisory Committee (TAC) reviews all applications for assistance under the Solar Panel and Water Tank Assistance components of the UAP, and makes a recommendation to the Minister for approval.
6. All Solar Panel installations under the Solar Panel Assistance are inspected and certified by the Electrical Inspectorate Division (EID).
7. All projects are monitored from implementation to completion. Follow-up visits are also being conducted on a sample of completed projects to assess usage and impact on the beneficiary's standard of living.
8. Each UAP supplier is utilized based on a "value for money" system within the approved expenditure limits for project implementation.
9. The UAP is administered within the MPU with no additional administrative or personnel costs tied to the operations of the programmes.

10.Regular reports are prepared and submitted on the UAP’S implementation on a monthly, quarterly and annual basis.

5.2.6. INTENDED VERIFICATION OF UAP BENEFICIARIES BY THE REGISTRAR GENERAL DEPARTMENT

The Ministry of Public Utilities is in the process of formally liaising with the Registrar General Department to request assistance to undertake a monthly assessment of its database to ensure that real-time information is provided on the deaths of Utility Bill Assistance programme beneficiaries. This will allow timely removal of deceased programme beneficiaries.

5.2.7. CONDUCTING SITE VISITS AT THE HOMES OF PROGRAMME BENEFICIARIES

The MPU currently conducts site visits at the homes of all applicants to be considered for assistance under the Water Tank Assistance and Solar Panel Assistance components of the UAP.

The MPU’s Monitoring and Evaluation Unit also conducts post-evaluation of beneficiaries and makes recommendations for improvements to programme operation.

The MPU also intends to conduct site visits at the homes of a sample of Bill Assistance beneficiaries to ensure that they are the resident recipient of the

programme benefit. This component of the UAP provides assistance to over 13,000 beneficiaries.

5.3. RESIDENTIAL ELECTRIFICATION ASSISTANCE PROGRAMME (REAP)

With respect to REAP, the following paragraphs give a detailed description of the current administration of the programme

5.3.1. COST EFFECTIVE MEASURES

The Programme funding is provided for through the Public Sector Investment Programme (PSIP) budgetary allocation of the Ministry of Public Utilities. In the case of first-time wiring and rewiring services, the MPU will provide one-time assistance with materials and labour, which together shall not exceed a total cost of twenty thousand dollars **(\$20,000.00)**.

5.3.2. APPROVAL PROCESS

In order to obtain approval for the REAP, applicants must submit a completed application form with all supporting documents to the MPU. Applicants who have submitted the requisite documents shall have their residence subjected to a site visit. The Technical Advisory Committee (TAC) would consider the application and make recommendations to the Minister of Public Utilities for approval.

Procedure for Contract Selection

- i. Estimates for jobs will be invited - on a rotational basis - from contractors from the Registered Pool of REAP Contractors.
- ii. Contractors must submit estimates in the form of a *Detail Scope of Work* and estimate cost within five (5) days of receipt of letter of request for the estimate from the Ministry.
- iii. The Project Support Officer (PSO) reviews estimates for completeness and accuracy then submits estimates to the Project Manager.
- iv. A list of recommended estimates must be reviewed by the Project Manager before submission through the Programme Manager to the Permanent Secretary for approval.
- v. Approved estimates are placed on the relevant Contractor file and submitted to the Director of Legal Services for preparation and execution of Contracts. A copy of which is submitted by the LSD to the SPPU.
- vi. Monitoring of works is done by the PSO on a weekly basis until completion within thirty days (30) and the database is updated.
- vii. The Project Support Officer (PSO) conducts random site visits and undertake a stratified random sample to assess the projects and to verify progress/completion.

5.3.3. PROGRAMME ADMINISTRATION

The Programme is being implemented by the Sectoral Programmes and Projects Unit of the Ministry of Public Utilities through the contracting of qualified service providers.

Furthermore, the Programme is evaluated by the Monitoring and Evaluation Unit to ensure its alignment with Government policy.

The major activities being implemented within each quarter of the fiscal year are:

- i. Perform site visits and assess areas for inclusion into the programme;
- ii. Develop project scope and cost of residential electrification projects;
- iii. Contract and implement residential house wiring/rewiring projects; and
- iv. Monitor and close out house rewiring projects.

Moving forward the Ministry hopes to implement the following cost effective measures:

- Tendering by Contractors by zone with a minimum of 3 tenders to be assessed;
- Ministry purchasing of electrical materials wholesale where by the Contractors will only be required to provide labour.

5.3.4. ROLL OUT OF PUBLIC AWARENESS CAMPAIGN

The Ministry of Public Utilities through its Public Education Campaign seeks to ensure that information on the REAP is accurately disseminated to those persons who are most in need of its assistance.

Promotional activities will include the following:

- i. Develop a Fact Sheet and distribute to the T&TEC Customer Service Centres, the Electrical Inspectorate Division (EID) and Offices of Members of Parliament throughout Trinidad and Tobago;
- ii. Upload Application Forms, Frequently Asked Questions and Fact Sheets to the MPU's Facebook Page and the MPU's Website;
- iii. Develop and distribute REAP brochures; and.
- iv. Conduct and participate in outreach Programmes.
- v. Advertising in newspapers, radio and television.

5.3.5. DETAILS OF HOW SITE VISITS ARE CONDUCTED

Field visits are conducted at various sites throughout Trinidad and Tobago for assessment of completed applications received under the Residential Electrification Assistance Programme (REAP). Site visits are conducted on a bi-weekly basis, and are required for the following reasons:

Pre requisite

Conducting field visits are a pre requisite for applications submitted for assistance under the Residential Electrification Assistance Programme (REAP), to be forwarded to the Technical Advisory Committee (T.A.C.) for consideration.

Assessment

Field visits are essential to verify information placed on the application form, and to assess the readiness/suitability/feasibility of the site and structure for electrical services required.

Recommendation

Recommendations for approval/non approval can only accurately and fairly be made after a site visit is conducted.

Verification of completed projects

Approved projects are visited after completion of works to assess project compliance by the Contractor.

The following details how site visits are conducted:

Firstly, the applications are zoned by geographic location. The applicants are contacted at least one day prior to the scheduled site visit. In addition to verifying the applicant related information on the application form; on the day of the site visit, the applicants are asked the following questions:

For first time wiring requests:

1. Who is the owner of the home/structure?
2. How long was the structure built?

3. What financial means were used to build the structure?
4. How long has the applicant been residing in the home; and what is the current source of electricity supply? **OR** Where does the applicant currently reside; and what are the terms of such arrangement?
5. Was a request made to T&TEC to assess the need for Electrification / Private Poles and access to connection?

For rewiring wiring requests:

1. Who is the owner of the home/structure?
2. What is the age of the wiring?
3. Do any electrical problems exist?

If the applicant response is yes, he/she is asked to describe same; if his/her response is no, based on the age of wiring stated and the appearance of same, the applicant is advised to visit the nearest Electrical Inspectorate Division (EID) office, and apply to have a condition inspection completed to assess the state of wiring existing in the applicant's home/structure.

The project officer conducting the site visit also verifies the accuracy of the project related information as stated on the application form e.g. no. of rooms.

The site/structure is also assessed for the following:

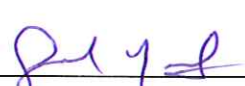
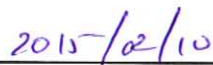
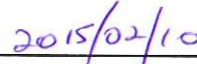
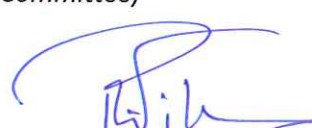
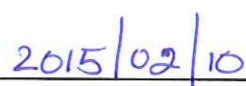
1. Access for connection by T&TEC;
2. Structural completion and readiness for electrical works; and
3. Age/Faulty electrical infrastructure existing in the applicant's home.
(where rewiring services are requested)

APPENDIX I

APPENDIX II

ANTI-FRAUD POLICY



Policy Owner	Head, Internal Audit & Compliance
Policy Reference No.	343.851.301.174.008.1
Version No.	Version No. 1.1 20130514
Effective Date	
Prepared By	Internal Audit & Compliance Department
Approved By  Chairman, Board of Commissioners	 Date: yyyy/mm/dd
 Chief Executive Officer	 Date: yyyy/mm/dd
Recommended for Approval by:  General Counsel & Corporate Secretary (Secretary to the Audit Committee)	 Date: yyyy/mm/dd
 Head, Internal Audit & Compliance	 Date: yyyy/mm/dd



VERSION CONTROL

Document Location

This document can be found on the Authority's Intranet, in the Human Resources Division and in the Internal Audit and Compliance Department's Policy and Procedure Manual.

Revision History

Last Revision Date	Reference Code	Summary of Changes
2012/03/23	1.0 20130323	New policy document
2013/05/14	1.1 20130514	Revised Policy document

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1.0 PURPOSE

The Anti-Fraud Policy has been established to:

- i. Facilitate the development of controls which will aid in the detection and prevention of fraud in the Authority;
- ii. Protect the Authority's revenues, property, information and other assets from any and all fraudulent activity; and
- iii. Provide guidelines that direct the process for handling cases of fraud within WASA and assign responsibility for the development of controls and conduct of investigations.

2.0 PERSONS COVERED UNDER POLICY

This policy applies to any and all employees, Executive Managers, Board Members, stakeholders, consultants, vendors, contractors and/or any other parties with a business relationship with the Authority where fraud, or suspected fraud has occurred.

3.0 POLICY

This policy establishes a framework for the prevention, detection of fraud and relevant management strategies developed to address these. It aims to:

- i. Raise the awareness of the circumstances of fraud and its prevention of in the Authority's environment;
- ii. Give guidance and protection to staff and others that report fraud in the Authority; and
- iii. Outline the processes for any investigation and external reporting for cases of reported fraud.



3.1 INVESTIGATIONS OVERSIGHT COMMITTEE (IOC)

An Investigations Oversight Committee (IOC) will be convened by the Chief Executive Officer to oversee all fraud investigations within the Authority. The Committee will be comprised of the:

- i. Head, Internal Audit and Compliance;
- ii. Director, Human Resources;
- iii. Corporate Secretary and General Counsel;
- iv. Relevant Directors and Heads for the area under investigation;
- v. Any relevant Subject matter experts as determined by the standing members; and
- vi. Any other employee deemed necessary by the standing members.

The IOC is authorized to receive reports based on preliminary investigations/ inquiries from the Internal Audit and Compliance Department as well as from Executive Managers. The Committee may request the Authority's Internal Audit and Compliance Department or an external firm to conduct investigations on their behalf. If any member of the IOC is under investigation, they must relinquish their responsibility as a member of the committee. If the Chief Executive Officer is under investigation it will be the responsibility of the Audit Committee to convene the Investigation Oversight Committee.

The Chief Executive Officer and/or Audit Committee, on the advice of the IOC, have the responsibility of referring to or notifying any relevant external agencies of any incidents of fraud that have been discovered at the Authority. Furthermore, any matters to be reported to the Trinidad and Tobago Fraud Squad must first be approved by the Audit Committee and will be coordinated through the Corporate Secretary and General Counsel.

3.2 CONFIDENTIALITY

It is the policy of the Authority inclusive of the Internal Audit and Compliance Department to treat all information received during investigations as confidential.

Any employee who suspects dishonest or fraudulent activity must notify the Head, Internal Audit and Compliance Department immediately, either verbally, in writing or via the e-voice anonymous reporting system. They should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act.



Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know as determined by the IOC. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect the Authority from potential civil liability.

3.3 DISCIPLINARY ACTION

The Authority will take disciplinary action in accordance with the Authority's disciplinary process, against any persons found committing incidences of fraud. Recommendations of the IOC will be submitted to the Chief Executive Officer who will direct the actions to be taken unless otherwise delegated to other Senior Officials.

Remedies extend to, termination of employment, restitution and forwarding information to the appropriate authorities for criminal prosecution. The actions taken will be consistent with the Authority's respective *Collective Agreements, Code of Ethics and Business Conduct, Employee Rules of Conduct, and the laws of Trinidad and Tobago.*

3.4 STRATEGIES TO PREVENT FRAUD AND PREVENTION

The Board sets the tone for fraud-risk management within the Authority by evaluating management's identification of fraud risks, implementation of anti-fraud measures and creating a strong internal control environment. Management applies its policies consistently as one of its primary anti-fraud and anti-corruption strategies to minimize fraudulent and corrupt behavior within the Authority.

The respective Departmental and Divisional managers will integrate the fraud prevention strategies by measures such as:

- i. Including the relevant clauses into supplier contracts and agreements, requiring them to agree in writing, as to abide by WASA's policy and procedures;
- ii. Creating an environment in which staff members believe that dishonest acts will be detected and investigated;
- iii. Ensuring that staff members understand that controls are designed and intended to prevent or detect fraudulent and corrupt behavior;
- iv. Encouraging staff members to report suspected fraudulent and corrupt behaviour directly to the appropriate manager without fear of disclosure or retribution;
- v. Ensuring fraud and prevention and detection controls are embedded in WASA's policies; and



- vi. Supporting Human Resources' recruitment strategies aimed at fraud prevention such as ensuring appropriate background investigations are performed on all selected employment candidates.

4.0 INCIDENCES OF FRAUD

Breaches of this policy may refer to, but are not limited to:

- i. Any dishonest or fraudulent act;
- ii. Forgery or alteration of any document or account belonging to the Authority for example, falsification of financial or non-financial statements, transactions, reports or other documents, credentials, age, etc.;
- iii. Forgery or alteration of a check, bank draft, or any other financial document such as tampering with cheques, bank letters and/or electronic funds transfers;
- iv. Misappropriation of funds, securities, supplies, or other assets. This includes larceny of cash on hand or from deposits, skimming of sales or receivables, inventory or other property misuse or theft, billing schemes, payroll schemes and expense reimbursement schemes;
- v. Impropriety in the handling or reporting of money or financial transactions;
- vi. Profiteering as a result of insider knowledge of company activities;
- vii. Disclosing confidential and proprietary information to outside parties;
- viii. Disclosing to other persons securities activities engaged in or contemplated by the company;
- ix. Employee conflict of interest arising when an employee takes or has an interest in a transaction that is actually or potentially adverse to the interest of WASA without disclosing that interest as required in WASA's Code of ethical conduct;
- x. Bribery through giving, accepting or seeking anything of value in order to influence a business decision;
- xi. Illegal gratuities through giving, accepting or seeking anything of value because of a business decision or other official act that has taken place;
- xii. Destruction, removal or inappropriate use of records, furniture, fixtures, and equipment;
- xiii. Wrongfully using influence in a business transaction to procure some benefit for oneself or another person contrary to your duty to WASA or to the rights of others. Included in this category are conflict of interest, bribery, illegal gratuities and economic extortion; and/or
- xiv. Any similar or related inappropriate conduct not defined above, but which benefits the employees rather than the organization.

Nb. Things of value may include cash, loans, travel, gifts, entertainment, sexual favors etc. Employees should refer to WASA's code of ethical conduct.



5.0 DEFINITIONS

Item No.	Word/Phrase	Definition
1	Fraud	The Institute of Internal Auditors in its International Professional Practices Framework has defined Fraud as: "... any illegal act characterized by deceit, concealment, or violation of trust. These acts are not dependent upon the threat of violence or physical force. Frauds are perpetrated by parties and organizations to obtain money, property, or services; to avoid payment or loss of services; or to secure personal or business advantage." Therefore, fraud is not restricted to monetary or material benefits and includes intangibles such as status and information.
2	Asset Misappropriation	Involves the theft or misuse of the company's assets
3	Bribery	The giving, receiving, offering or soliciting anything of value to influence an official act or business decision
4	Illegal gratuity	The giving, receiving, offering or soliciting anything of value for or because of an official act or business decision
5	Billing schemes	Include the use of shell companies, fictitious delivery notes and/or invoices, false certification of receipt of goods or services, etc to defraud the company.
6	Payroll schemes	Include the use of ghost employees, falsified claims for hours worked, falsified rates, misstatement of performance records used for compensation purposes, etc to defraud the company.
7	Skimming	Includes theft and associated non-recording or understatement of sales receipts, refunds, write-off of receivables, etc.
8	Cheque tampering	Includes actions such as forged maker, forged endorsements, altered payee, concealment of cheques, etc. to defraud the company.



6.0 RESPONSIBILITIES

6.1 HEAD, INTERNAL AUDIT AND COMPLIANCE

The Internal Audit and Compliance Department has the primary responsibility for the investigation of all suspected fraudulent acts as defined in the policy as directed by the IOC. If the investigation substantiates that fraudulent activities have occurred, the Head, Internal Audit and Compliance Department will issue reports to appropriate designated personnel and to the Board of Commissioners through the Audit Committee. In this regard the Head, Internal Audit and Compliance takes necessary action to protect and track all pertinent documents received during an investigation to ensure that such documents are available when needed e.g. as evidence in a court of law.

Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made in conjunction with legal counsel (i.e. the Authority's Legal Department) and senior management, as will final decisions on disposition of the case.

Additionally, should the fraudulent activity under investigation involve the Head, Internal Audit and Compliance or any member of the Internal Audit and Compliance Department then the Head, Internal Audit and Compliance Department's responsibilities regarding the Investigations Oversight Committee will be assumed by the Corporate Secretary and General Counsel. In such circumstances, the CEO and/or Board of Commissioners may engage an external firm to conduct the investigations under the oversight of the IOC.

6.2 AUDIT COMMITTEE

The Audit Committee will receive reports and recommendations arising from any investigation into fraudulent and corrupt activity by the Internal Audit and Compliance Department and the Investigations Oversight Committee. The Audit Committee will follow up on the status of these reports and recommendations made during its regular meetings to ensure that these matters are brought to a conclusion.

Additionally, the Committee will grant permission to report any appropriate matters to the Trinidad and Tobago Fraud Squad. This process will be coordinated through the Corporate Secretary and General Counsel.



6.3 CHIEF EXECUTIVE OFFICER (CEO)

The CEO has the ultimate responsibility for the prevention and detection of fraud and is responsible for ensuring that appropriate and effective internal control systems are in place. The CEO has the power to convene the Investigation Oversight Committee. On the advice of the IOC, the CEO has the responsibility for referring to or notifying any relevant external agencies on any incidents of fraud that have been discovered at the Authority. However, reports to the Trinidad and Tobago Fraud Squad must first receive approval from the Audit Committee.

6.4 CORPORATE SECRETARY AND GENERAL COUNSEL

The Corporate Secretary and General Counsel acts as a member of the Investigation Oversight Committee (IOC) and when required provides legal advice and expertise to the IOC. Also the Corporate Secretary and General Counsel when required acts as the nominated point of contact for the Trinidad and Tobago Fraud Squad. The Corporate Secretary and General Counsel therefore co-ordinates the reporting of any incidents of fraud to the Trinidad and Tobago Fraud Squad after permission has been granted by Audit Committee.

6.5 MANAGEMENT

All levels of management are responsible for the prevention and detection of fraud and for the implementation and operation of controls that minimise fraudulent and corrupt activity within their areas of responsibility. Management is also responsible for responding promptly to, and conducting preliminary investigations into, allegations of fraud suspected within their department and communicating findings to the Head, Internal Audit and Compliance and by extension the IOC. Managers should incorporate into their annual planning processes, fraud control measures that cover risk assessment, awareness programs and appropriate training and continuously educate their staff about fraud prevention and promoting an awareness of common indicators of fraud in their departments.

6.6 GENERAL STAFF

Staff members are responsible for compliance with controls, policies and procedures and must be aware of the signs of fraudulent and corrupt activity applicable to their areas of operations. All employees have a duty to immediately report such activity to either management within their department/division, or should they believe this to be inappropriate, to the Head, Internal Audit and Compliance. Staff members are expected to assist with any enquiries and investigations pertaining to fraudulent and corrupt activity.



7.0 PROCEDURES

The Head, Internal Audit and Compliance may design procedures to ensure the efficient reporting, investigation and resolution of fraud.

The following procedures shall apply:

- i. Complaints can be written or verbal. If verbal complaints are made, then the person receiving the complaint shall create a written record of the complaint. Written complaints should be copied and secured to ensure confidentiality in respect of both information and personnel. Complaints received via e-voice will first be investigated by the relevant Case Administrators and escalated into full scale audit investigations if the findings are significant by The Head, Internal Audit and Compliance. *Nb. Refer to the Authority's approved Confidential Reporting Policy*
- ii. The person receiving the complaint shall make a detailed report to the relevant Executive Manager who may contact the Head, Internal Audit and Compliance Department for preliminary advice and guidance before initiating any preliminary enquiry.
- iii. The Head, Internal Audit and Compliance will present preliminary findings to the Chief Executive Officer and advise on convening the Investigations Oversight Committee (IOC).
- iv. Should a legitimate difference of opinion arise between the Chief Executive Officer and the Head, Internal Audit and Compliance regarding the need to convene the IOC, the matter would be referred to the Audit Committee for a decision to be made.
- v. The Internal Audit and Compliance team will keep the IOC informed of the status of investigations and report its findings to the Chief Executive Officer, the relevant Director of the Division, the responsible Heads of Department and the Audit Committee Chairman.
- vi. During any investigation conducted by the Internal Audit and Compliance Department, the Human Resources Division shall be responsible for employee relations' advice and action. Internal Audit and Compliance will ensure that the Human Resources Division is kept informed of the progress of any investigations and will take into account advice regarding Employee Relations conducting any preliminary investigation. Where the alleged offence also involves a breach of discipline, the Human Resources Division will be responsible for ascertaining whether a breach of discipline has occurred. Disciplinary investigations may proceed simultaneously with criminal investigations.



- vii. In all cases the person undergoing a full investigation shall be notified in writing of the essential particulars of the findings, following completion of the investigation and prior to any disciplinary action being taken;
- viii. A copy of the detailed audit or investigation report shall not be given since it may contain matters that are solely for management's and Audit Committee's attention. The person under investigation shall be required to respond to the findings in writing within a stipulated timeframe.

Nb. Only a summary of an audit or investigation report would be shared with any authorized persons requesting the report.
- ix. Any disciplinary action shall be in accordance with WASA's relevant policies and procedures and collective agreements.
- x. If criminal fraud is involved, the Trinidad and Tobago Fraud Squad may need to be informed. This will occur after receiving approval from the Audit Committee and will be coordinated through the Corporate Secretary and General Counsel.



8.0 CERTIFICATE OF RESPONSIBILITY

Management commits to create and maintain a strong internal control environment that ensures implementation and adherence to the Authority's policies. It is our responsibility to provide resources, facilitate training, provide ongoing support, disseminate and communicate new and revised policies to all affected parties. As management, we accept responsibility for enforcing all policies and we commit to immediately address all reports or suspicions of policy breaches. This means that we will apply sanctions in a timely manner without regard to designation or seniority.

This policy must be adhered to by all members of staff (i.e. Executives, Managers, Supervisors and permanent, contracted and all temporary employees) and we will ensure that this policy is revised and updated consistent with changes in business conditions, applicable laws and regulations.

A handwritten signature in blue ink, appearing to read 'R. L. L.', is written over a horizontal line.

Head, Internal Audit and Compliance

A handwritten date '2015/02/10' in blue ink is written above a horizontal line.

Date: yyyy/mm/dd

A handwritten signature in blue ink, appearing to read 'Judy L.', is written over a horizontal line.

Chief Executive Officer

A handwritten date '2015/02/10' in blue ink is written above a horizontal line.

Date: yyyy/mm/dd



The Water and Sewerage Authority
Anti-Fraud Policy



Public Awareness Campaign 2017

Drafted by the Corporate Communications Unit

January 11, 2017

Ministry's Corporate Vision

To become an organization dedicated to excellence in the delivery of public utilities for the sustainability of our country and an improved quality of life of its citizenry.

Mission Statement

To facilitate the effective delivery of efficient, affordable and quality public utilities services through a committed, resourceful team of professionals in close collaboration with all stakeholders.

Ministry's Agencies, Divisions and Units

The Ministry of Public Utilities is the arm of Government mandated to ensure the effective delivery of affordable and quality public utilities services to the citizens of Trinidad and Tobago. It does this by providing leadership, advocacy and governance to the Utility Agencies, Divisions and Units under its purview. The services offered by these entities include:

- Electricity/electrical services through the Trinidad and Tobago Electricity Commission (T&TEC).
- Postal services through the Trinidad and Tobago Postal Corporation (TTPost).
- Telecommunications services through the Telecommunications Services of Trinidad and Tobago (TSTT).
- Provision of a reliable water supply through the Water and Sewerage Authority (WASA).
- Waste management and environmental protection through the Trinidad and Tobago Solid Waste Management Company (SWMCOL).
- Protection of the consumers' interests through the Regulated Industries Commission (RIC).
- Security, maintenance, landscaping and janitorial services for Government buildings through the National Maintenance Training and Security Company Limited (MTS).

- Inspection and certification services through the Government Electrical Inspectorate Division.
- Weather forecasts and local climate data services through the Meteorological Services Division.

In addition to these services, three programmes are spearheaded by the Ministry of Public Utilities directly. These include:

- The Utilities Assistance Programme (UAP) – solar panel, water tank, bill assistance
- The Residential Electrification Assistance Programme (REAP) – household wiring and rewiring
- The Electrification Programme – electrical infrastructure from grid to house

Rationale

Given the expansive scope of the services that fall under the MPU's remit and their impact on everyday life in Trinidad and Tobago, the establishment and maintenance of an efficient and effective communications structure that will facilitate linkages with all key stakeholders (internal and external) is of great importance.

As such, a Public Awareness Campaign is proposed for the purpose of giving public exposure to the work of the Ministry while providing other relevant information on a timely basis to stakeholders. This will be achieved through the use of various communication strategies and technologies, inclusive of feedback mechanisms.

Objectives

Informational

- To increase awareness of the Ministry's services and programmes, inclusive of its social intervention programmes.

Attitudinal

- To engender public trust in the MPU, its Agencies and its services.
- To encourage ownership of the MPU's vision and mission among internal stakeholders.

Behavioural and call to action

- To encourage eligible citizens to apply for the MPU's programmes.
- To foster desirable consumer habits among the general public.

Communication Tools

The Public Awareness Campaign will utilise a variety of multi-media platforms and communication technologies/ tools to ensure that the MPU's message is disseminated as widely and effectively as possible. These will include:

- Print advertisements (newspapers, magazines, flyers)
- Electronic advertisements (television, radio and internet)
- Brochures, posters and other literature
- Public appearances on radio and television talk shows as well as at various public exhibitions
- Direct Personal Communication (public outreaches)
- MPU branded promotional items

Strategies

Print Media

- Advertisements featuring the MPU's services will be placed in the three national newspapers.
- Advertisements will also be placed in Agency and Government Newsletters, magazines and brochures.
- Flyers will be distributed through the mail, targeting specific communities where outreaches will be held.
- Brochures will be made available at the MPU Head office and Agencies.

Radio

- Radio advertisements highlighting specific services and programmes will be placed on specific radio stations, based on the desired target audience.
- Scheduled appearances will be made on various radio talk shows.

Television

- A television advertisement highlighting the MPU's social programmes will be produced.
- Scheduled TV appearances will be made by MPU staff on Good Morning T&T (CNMG) and other morning shows.
- Testimonials featuring recipients of the MPU's social programmes will be produced and aired.

New Media (internet and social media)

- Print advertisements will be placed on the MPU website and Facebook page to be accessed by members of the public.

- Audio visual content will also be created specifically for Facebook, Twitter and YouTube.
- Content will be synchronised and linked, creating a coherent brand across all online platforms.
- Social media platforms will also facilitate responses from the target audience while providing statistics on engagement.

Direct Personal Communication

- Thirteen (13) public outreach events, each in a different Region, will be held over the course of one year.
- The MPU will also be represented at exhibitions and outreach events hosted by other Agencies and Government entities.

Message

The MPU's mission, coupled with the objectives of the Public Awareness Campaign, is captured in the tagline: "BRINGING THE UTILITIES TO YOU!"

That message will be voiced and reinforced in the various advertisements, appearances and interactions that constitute the campaign.

Budget

When specific campaigns are approved and confirmed, costing will be determined. Some categories to be taken into consideration for identified campaigns could include, but are not limited to: -

- Production cost (radio and television ads)
- Placement of ads in the traditional media (radio, television, newspapers)

- Infrastructural costs for public outreach
- Acquisition of promotional items

Monitoring and Evaluation

Several tools will be used to monitor the effectiveness and efficiency of the Public Awareness Campaign. These include:

Activity	Frequency
Monitoring and Archiving of Press Clippings and Radio & Television Programmes	Daily
Monitoring of comments and messages on social media	Daily
Project management team meetings	Weekly
Communications Budget Review: Estimated vs. Actual	Monthly
Audit of employee involvement in MPU Events	When applicable
Customer satisfaction surveys	Bi-Annually
Review of the implementation of the various campaign strategies in relation to their stated objectives	When applicable

