

**From:** [Hepper, Fiona](#)  
**To:** [Cooper, Trevor](#); [Thomson, David](#)  
**Cc:** [McCutcheon, Joanne](#); [Hutchinson, Peter](#); [Hepper, Fiona](#)  
**Subject:** RHI : follow up to meeting on 3rd April  
**Date:** 04 April 2012 15:31:46  
**Attachments:** [OTOP.png](#)

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Trevor

David

At our meeting yesterday (3rd April) we covered the outstanding points in relation to risks - and particularly those relevant to policy and administration.

In relation to policy - it was noted and agreed that DETI, as with any other policy, carries the associated risks and manages these appropriately.

In relation to administration, 2 points were raised - if an Ofgem member of staff defrauded the scheme, or, if incorrect payments were made what would happen. Peter spoke to Ofgem and enquired about their internal fraud policy and the specific point above. The key point is that, Ogem have a Fraud and Audit Strategy in place and the issue(s) we have raised will be considered in the context of this Strategy in advance of the launch of the scheme. This work will identify potential risks or opportunities within the administration for internal fraud and would implement mitigating factors where required – this could include additional oversight for specific roles or functions.

In terms of suing accredited installations that have been overpaid but monies cannot be recouped, it will be up to DETI to carry out legal action as enforcement power will remain with us.

I hope this is helpful

Fiona

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