



Types and Sources of Potential Fraud

Type	Fraud	Controls	Mitigation
Internal: Ofgem staff	Inappropriate use of confidential information, collusion with participants to bypass internal controls, fraudulent manipulation of periodic support payments/RHI accounts,	Ofgem internal controls	Segregation of duties Restricted access to applicant/participant confidential information. 3 rd party verification Increased focus on fraud prevention: fraud awareness training, whistleblowing training, fraud prevention microsite Staff code of conduct Employee reference checks and security checks Sample checks
External: Gaming opportunities	Participants generate eligible heat but which does not meet the spirit of the scheme or use heat in a non-energy efficient manner In order to benefit from higher periodic support payments, applicants: <ul style="list-style-type: none"> • Oversize/under-rate the capacity of their boilers • Purposefully install multiple small boilers instead of larger ones 	Legislation	Engage with DECC to modify legislation or accept risk
External: Third parties	Hacking/spamming of the RHI Register	Ofgem internal controls	Mitigating controls are included in the NDRHI Risk Management and Accreditation Document Set (RMADS) document.