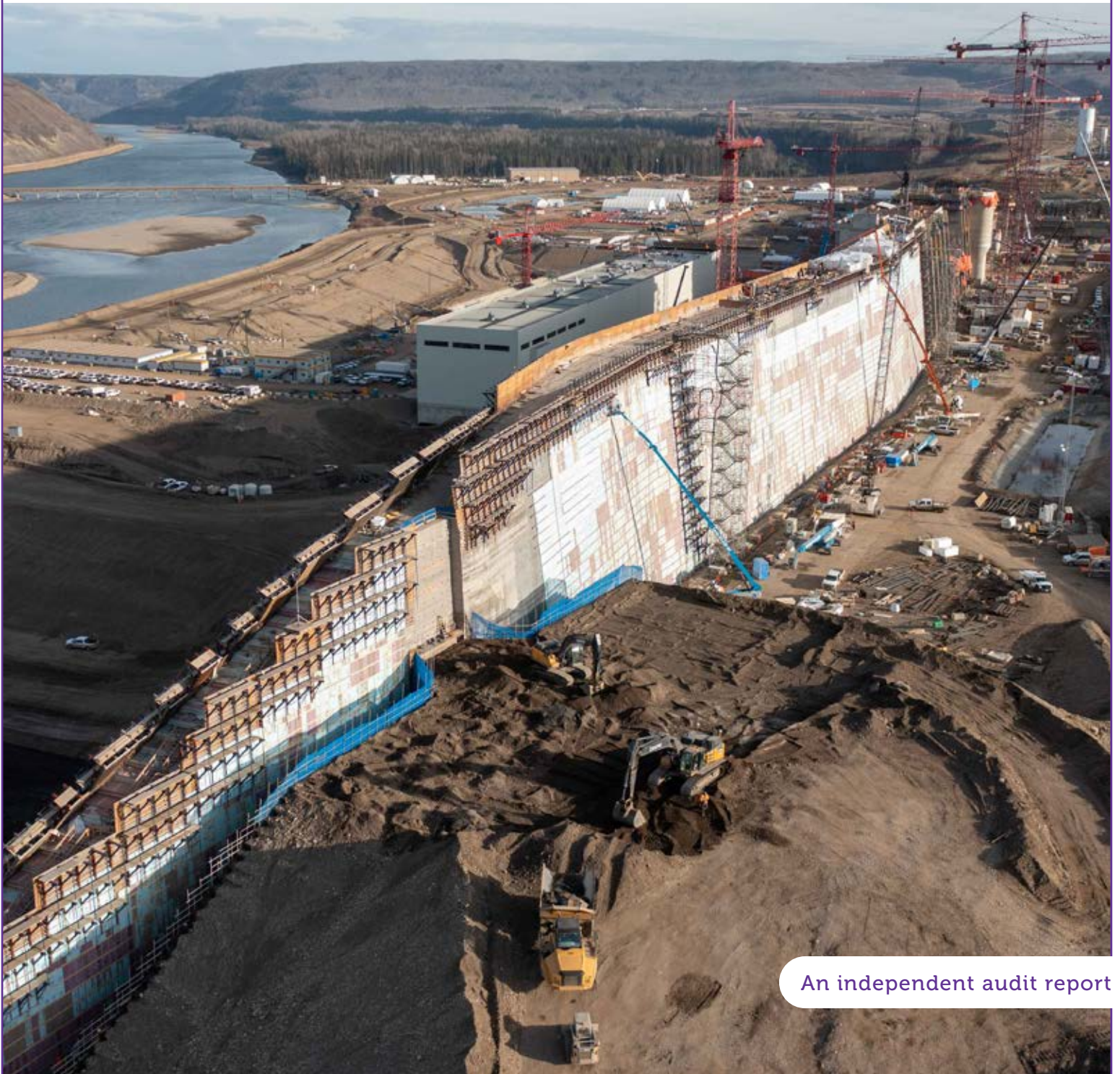




Office of the
Auditor General
of British Columbia

April 2022

Fraud Risk Management: Site C Dam and Hydroelectric Energy Project



An independent audit report



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Auditor General
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The Honourable Raj Chouhan
Speaker of the Legislative Assembly
Province of British Columbia
Parliament Buildings
Victoria, British Columbia
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Dear Mr. Speaker:

I have the honour to transmit to the Speaker of the Legislative Assembly of British Columbia the report: *Fraud Risk Management: Site C Dam and Hydroelectric Energy Project*.

We conducted this audit under the authority of section 11(8) of the *Auditor General Act*. All work on this audit was performed to a reasonable level of assurance in accordance with the Canadian Standard on Assurance Engagements (CSAE) 3001 – Direct Engagements, set out by the Chartered Professional Accountants of Canada (CPA Canada) in the *CPA Canada Handbook—Assurance*.

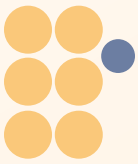
Michael A. Pickup, FCPA, FCA
Auditor General of British Columbia
Victoria, B.C.

April 2022

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Audit at a glance

Why we did this audit

- The Site C dam and hydroelectric energy project on the Peace River in northeastern B.C. is the largest and most expensive infrastructure project in the province's history.
- Site C has an estimated construction cost of \$16 billion and is scheduled for completion in 2025.
- Fraud related to projects of this scale and complexity can be costly and wasteful, so effective fraud risk management is essential for financial and operational integrity.

Objective

To determine if the British Columbia Hydro and Power Authority (BC Hydro) has established a program to effectively manage fraud risk on the Site C dam and hydroelectric energy project (Site C).

Audit period:

December 2014 to January 2022

Conclusion

BC Hydro's internal framework of control includes elements of fraud risk management, but it has not established a fraud risk management program for the Site C project.

BC Hydro's board of directors approved a fraud risk policy on January 12, 2022, documenting organizational commitment to fraud risk management.

We made five recommendations focused on BC Hydro:

- implementing its new fraud risk policy
- providing fraud risk management training
- conducting regular fraud risk assessments
- developing a fraud investigation procedure
- regularly evaluating fraud risk management program effectiveness

BC Hydro has accepted all recommendations.

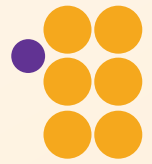
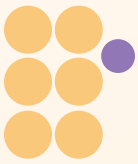
What we found

BC Hydro's board of directors approved a fraud risk policy on January 12, 2022

- Prior to approval of the new fraud risk policy, no documentation clearly assigned fraud risk management responsibility to a senior BC Hydro executive, including Site C.
- Few employees have received fraud risk management training.
- BC Hydro has a code of conduct policy, ethics office, and an anonymous reporting line – elements of a fraud risk management program.

Recommendations 1 and 2





Audit at a glance *(continued)*

Prior to this audit, BC Hydro had not performed fraud risk assessments for Site C

- BC Hydro drafted its first fraud risk assessment as this audit was in progress.
- The absence of regular fraud risk assessments increases the risk of overlooking potential fraud threats.

Recommendation 3

BC Hydro has internal controls to defend against identified fraud threats

- Existing controls documented in BC Hydro's fraud risk assessment were suitably designed, implemented, and likely to mitigate fraud schemes identified in the assessment.
- There is a risk that existing controls may not be enough to address unidentified fraud threats.

No recommendation

There are ways for BC Hydro employees to report and investigate suspected fraud

- BC Hydro has ways for employees to report potential fraud.
- Audit Services at BC Hydro investigates fraud allegations related to accounting and auditing matters.
- BC Hydro is developing a fraud investigation procedure to supplement its fraud risk policy.

Recommendation 4

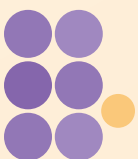
BC Hydro has not established a Site C fraud risk management program for it to monitor and evaluate

- As fraud threats evolve and change over time, a fraud risk management program should be monitored and evaluated for effectiveness.
- In the absence of a fraud risk management program, Audit Services at BC Hydro has audited Site C's:
 - procurement and contract management processes and practices in 2017
 - payment verification controls in the fall of 2021
- They had no major findings.

Recommendation 5

After reading the report, you may want to ask the following questions of BC Hydro:

1. What has BC Hydro, at Site C, done to address the types of fraud threats that are most common on infrastructure projects of this size?
2. How will the Site C project team assess and respond to fraud threats going forward?
3. What can companies that are involved in public infrastructure projects learn from this audit?



Background

Site C – B.C.’s largest public infrastructure project

BC Hydro’s Site C dam and hydroelectric generating station, on the Peace River in northeastern B.C., is the largest public infrastructure project in provincial history. Approved for construction in 2014, it will cost an estimated \$16 billion to complete by 2025. (Exhibit 1).

Exhibit 1: Regional area map showing Site C location

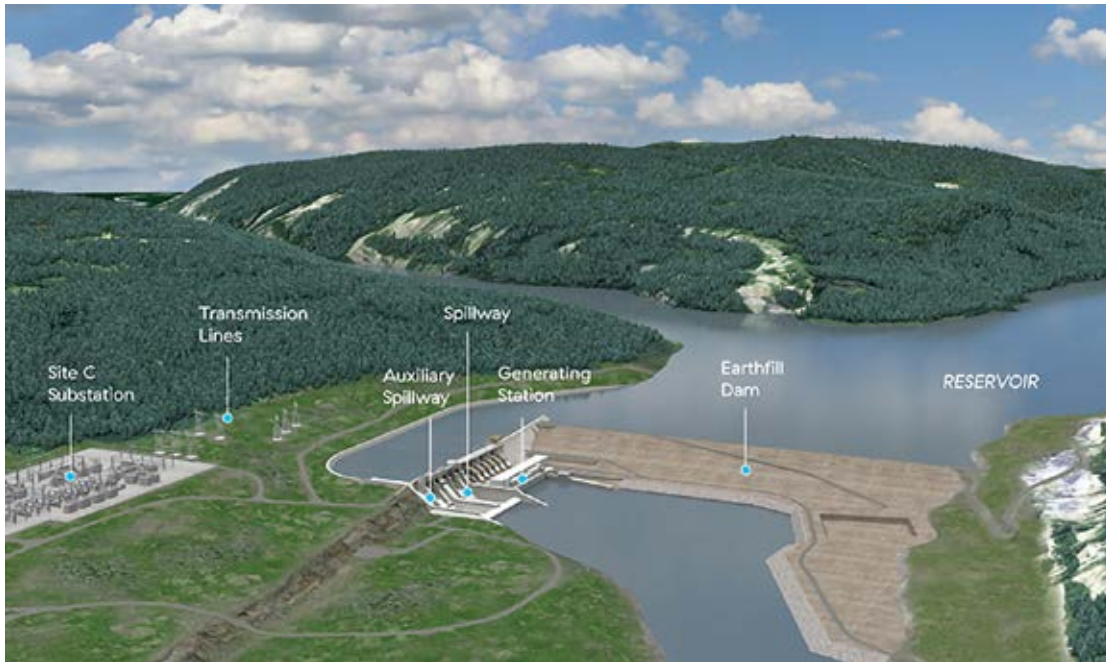


Source: BC Hydro

BC Hydro estimates the Site C facility (Exhibit 2) will produce 1,100 megawatts of energy – enough to power about 450,000 homes yearly. The project has drawn interest for its safety, social, environmental, and economic impacts.



Exhibit 2: Site C project components



Source: BC Hydro

Engineering and construction fraud

The Global Infrastructure Anti-Corruption Centre published a list of 13 reasons why engineering and construction projects are prone to corruption. Key reasons include:

- Infrastructure projects are unique and the larger and more complex they become, the harder it is to compare costs and detect corruption and fraud.
- Large infrastructure project relationships and transaction chains are complex, making it easier to blame others or submit false claims for payment.
- Substandard materials and workmanship can be concealed behind other components of the project. Close supervision is required as work progresses.

Fraud is any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain.

Source: Committee of Sponsoring Organizations of the Treadway Commission (COSO) Fraud Risk Management Guide

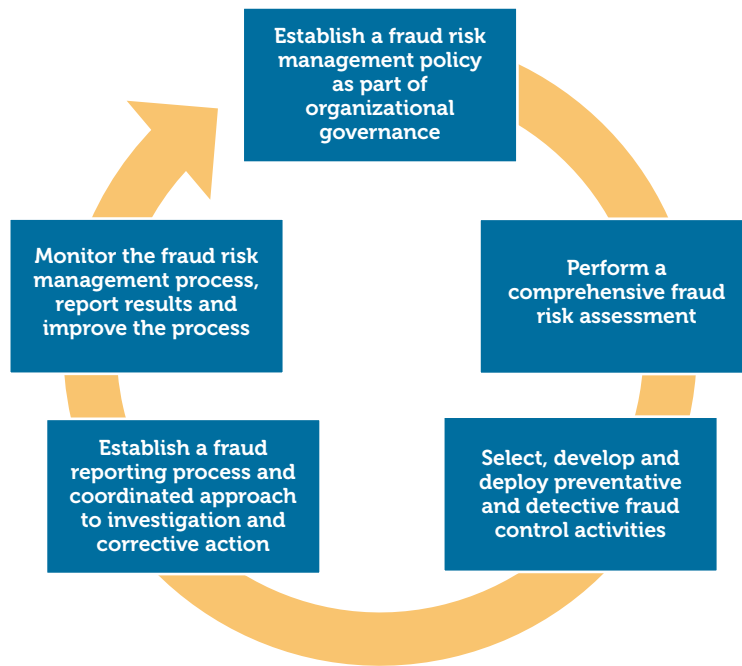


Fraud risk management

Organizations can effectively identify and respond to fraud risk by actively designing and implementing fraud risk management programs that include:

- strong leadership, communication, and training
- comprehensive ongoing fraud risk assessments
- designing and implementing effective internal controls
- exercising vigilance, due diligence and effective approaches to fraud investigation and corrective action
- ongoing monitoring and evaluation of fraud risk management processes and practices

Exhibit 3: Ongoing, comprehensive fraud risk management process



Source: COSO Fraud Risk Management Guide

[Learn more about how we did this audit.](#)



Objective

The objective of the audit was to determine if British Columbia Hydro and Power Authority (BC Hydro) has established a program to effectively manage fraud risk on the Site C dam and hydroelectric energy project (Site C).

Scope

BC Hydro was audited for the existence of corporate processes and activities designed to manage potential fraud on the Site C project.

We did not audit other areas of BC Hydro that do not relate to the Site C project. We did not focus on any aspects of Site C construction not related to fraud risk management. We did not conduct a fraud investigation. We did not look for potential instances of fraud on the Site C project.

The time period of the audit was December 2014 (Site C project approval) to January 2022.

[Learn more about the audit criteria.](#)

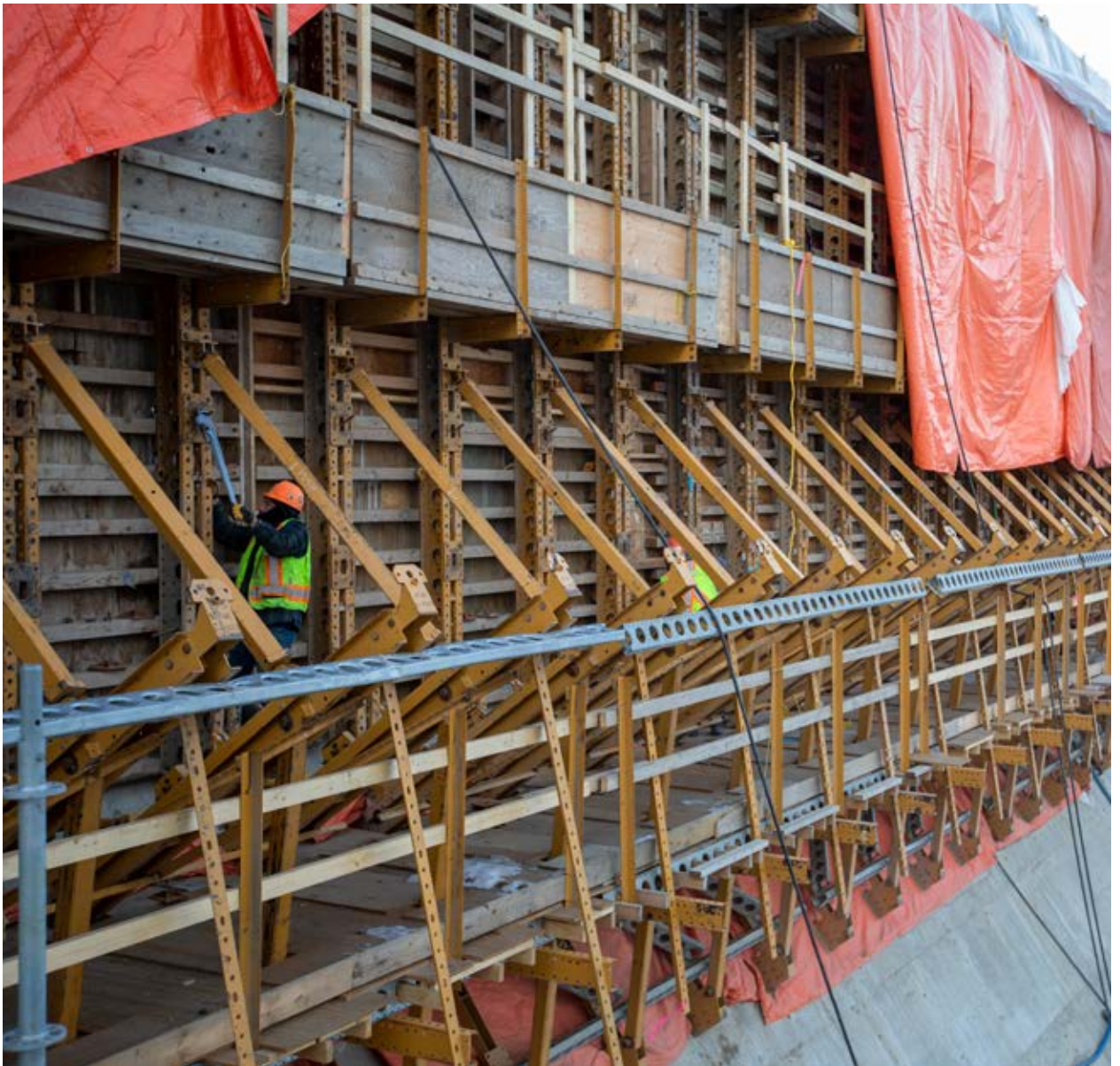
[Learn more about how we did this audit.](#)



Conclusion

BC Hydro's internal framework of control includes elements of fraud risk management, but it has not established a fraud risk management program for the Site C project.

BC Hydro's board of directors approved a fraud risk policy on January 12, 2022, documenting organizational commitment to fraud risk management.



Findings and recommendations

Fraud risk governance

All organizations that are subject to significant fraud risk arising from their operations are responsible for carefully managing fraud risk for protection from financial, reputational, and other damage.

BC Hydro has documented its commitment to fraud risk management

What we looked for

We looked at whether BC Hydro's board of directors and senior management had documented their commitment to fraud risk management at Site C. We looked for whether:

- BC Hydro's board of directors and senior management had established and communicated an organizational fraud risk management program in a policy that the Site C project is required to follow.
- The board or the CEO designated a senior executive member to have overall responsibility for fraud risk management on the Site C project.
- BC Hydro has communicated integrity, ethical values, and fraud risk management roles and responsibilities to Site C employees.
- Site C employees have received fraud risk management training.

[Learn more about the audit criteria.](#)

What we found

BC Hydro's board of directors approved a fraud risk policy on January 12, 2022. Responsibility for fraud risk management has now been delegated to BC Hydro's chief financial officer. BC Hydro has communicated integrity as a corporate value – and expectations for ethical conduct – through its corporate code of conduct. While all staff are required to have code of conduct training, only the internal Audit Services staff have received fraud risk management training.



New fraud risk policy

Before the board of directors of BC Hydro approved the new fraud risk policy, the organization did not have a written policy on fraud. BC Hydro had previously identified the following policies and procedures as organizational supports for fraud risk management on Site C:

- Corporate code of conduct and procedure
- Risk management policy
- Financial management policies and procedures
- General procurement policy

Only the financial management and accounting policies and procedures mentioned fraud risk. For example, BC Hydro's internal controls policy states: "The size and the diversity of the workforce employed by BC Hydro increases the likelihood of human error and the possibility of fraud."

The corporate code of conduct includes integrity as a corporate value. Information about actual and apparent conflicts of interest, which can lead to acts of fraud, are described with examples. The concept of fraud, however, is not introduced and explained. That said, the code communicates leadership's expectation that staff know and comply with laws applicable to their work and that discipline, or termination of employment may result if laws and regulations are not followed.



Clearer fraud risk management responsibilities

Prior to the new fraud risk policy, no documentation existed to clearly assign a senior member of the organization with responsibility for fraud risk management. The new fraud risk policy clearly delegates overall fraud risk management to BC Hydro's chief financial officer and provides examples of fraud.

BC Hydro's new fraud risk policy clarifies organizational roles and responsibilities for fraud risk management and provides examples of fraud, making it easier for employees to see leadership's commitment to purposeful fraud risk management.

Limited fraud risk management training for employees

All BC Hydro employees, including Site C employees, complete code of conduct training annually, but only BC Hydro's internal Audit Services group has received fraud risk management training.

Comparatively, the B.C. core public service (ministries and central agencies) has done more. In addition to mandatory ethics training, mandatory fraud training has been introduced to raise awareness and teach public service employees working directly for government ministries and central agencies how to prevent and detect incidents of fraud. As of January 2022, 82.5 per cent of these employees had completed the fraud awareness and prevention training.

Some of BC Hydro's employees can receive fraud-related training through their professional associations. For example, professional accountants working for BC Hydro are required to take ethics training as part of their accounting profession membership and they can receive information about fraud through their professional associations.

Why this matters

Organizations develop and promote an effective anti-fraud culture by setting a proper tone at the executive leadership level, establishing clear direction and expectations for fraud risk management, and providing employees with effective anti-fraud training. Employees who view fraud as socially unacceptable, or criminal, are less likely to commit fraud and are more likely to report cases of potential fraud.

Recommendations

We recommend that:

1. BC Hydro implement its new fraud risk policy and procedures.
2. BC Hydro provide fraud risk management training to all staff.

[See the response from the auditee.](#)



Fraud risk assessment

Ongoing fraud risk assessments – financial and non-financial – are key to effective fraud risk management and they need to be continual because fraud threats evolve, requiring new controls to address them.

Prior to the audit, BC Hydro had not performed fraud risk assessments for Site C

What we looked for

We looked to see if BC Hydro has performed fraud risk assessments for Site C to identify specific fraud threats, assess their likelihood and significance, evaluate existing fraud control activities, and identify actions to mitigate fraud risk.

[Learn more about the audit criteria.](#)



What we found

BC Hydro did not perform Site C project fraud risk assessments prior to the start of our audit. Site C's construction risk registers included threats that could result in fraud, but these were not identified as explicit fraud threats.

BC Hydro drafted its first Site C fraud risk assessment after the audit began and identified a variety of potential fraud schemes common to large infrastructure projects. But because the assessment was an initial one, and the Site C team has not been conducting ongoing fraud risk assessments, there is a risk that some fraud threats were overlooked. The fraud risk assessment included employee-related fraud threats (i.e., payroll, overtime, and expense fraud) as well as procurement and contract-related fraud threats, which BC Hydro said would cause the highest financial impacts to the project.

We also noted that BC Hydro did not separately assess the risk associated with a potential fraud threat before the application of controls to reduce the risk (known as inherent risk). This important step would help to identify and assess the ability of key controls to mitigate risk.

Why this matters

Site C is a technically complex and expensive project. Fraud threats are always evolving. Without regular ongoing fraud risk assessments, BC Hydro will have to react to emerging fraud threats rather than proactively identify and address potential threats.

Recommendation

- 3.** We recommend BC Hydro conduct regular fraud risk assessments for the Site C project and proactively identify and address additional potential fraud threats.

[See the response from the auditee.](#)



Control activities

Internal organizational control is established and maintained through policies and procedures to mitigate the risk of error or fraud, prevent fraud from occurring, or to detect fraud when it occurs.

Controls to prevent potential fraud have been designed and implemented at Site C

What we looked for

We assessed whether BC Hydro has implemented preventative and detective fraud controls on the Site C project that align with the fraud risk assessment for the project. We did not assess the operating effectiveness of the controls.

[Learn more about the audit criteria.](#)

What we found

BC Hydro has implemented internal controls capable of preventing and detecting fraud at Site C. We confirmed these controls were suitably designed and implemented, and likely to mitigate the fraud schemes identified in BC Hydro's initial fraud risk assessment.

However, because BC Hydro has not been conducting ongoing fraud risk and controls assessments, there is an elevated risk that existing controls may not be adequately mitigating unidentified fraud threats.

Why this matters

Fraud controls protect organizations from negative financial and non-financial impacts. If an organization's fraud controls are not regularly reviewed and updated the risk of fraud increases, leaving it more vulnerable to losses and potential reputational harm.



Fraud investigation and corrective action

Internal control activities are necessary, but they do not provide complete fraud protection. It is important for organizations to establish ways for individuals to anonymously report suspected fraud. Clearly communicated protocols for thorough investigations and corrective action (including discipline and asset recovery) contribute to effective fraud risk management.

There are ways to report suspected fraud but no procedures to coordinate investigations

What we looked for

We examined whether BC Hydro has a communication process for reports of potential fraud at Site C and whether it coordinates investigations and corrective actions to address potential fraud.

We looked to see if BC Hydro had established a:

- communication process to obtain information about potential fraud
- fraud investigation and response protocol
- process to investigate potential fraud

[Learn more about the audit criteria.](#)



What we found

There are different ways for employees to report potential misconduct, including fraud, at BC Hydro and it is developing a fraud investigation procedure to supplement its fraud risk policy.

There are three ways for BC Hydro employees to report potential code of conduct breaches and fraud:

- directly to their manager or supervisor
- directly to BC Hydro's ethics officer
- through BC Hydro's confidential third-party reporting system

BC Hydro's code of conduct states disclosures or reports will be treated as confidential and only disclosed if necessary (i.e., threat of harm or legally required). Where there are concerns about reprisals, the ethics officer will monitor and report to human resources where required.

We asked BC Hydro if there had been any code violations related to Site C and any potential fraud investigations since 2014. BC Hydro identified one complaint registered through its third-party reporting system in 2021, and five employee-related incidents raised directly by BC Hydro managers – two in 2020, two in 2019 and one in 2016.

The complaint registered through the third-party reporting system found no wrongdoing. Four of the five employee-related cases were found to be policy violations. The 2016 case was deemed to be a theft of time, where an employee claimed, and received, compensation for work they didn't perform, which is an example of fraud. All five cases were addressed by management including repayment for the 2016 case.

A fraud investigation procedure to supplement the fraud risk policy has not been completed

BC Hydro's code of conduct and special investigations procedure state that breaches of the code or other allegations can be investigated by the internal Audit Services unit or other departments. The document also states that BC Hydro does not yet have a formal fraud risk management framework which would define departmental responsibilities and involvement in investigations.

BC Hydro is developing a fraud investigation procedure to supplement its new fraud risk policy.

BC Hydro's ethics office is responsible for coordinating and reviewing fraud allegations. They may assign cases to the internal Audit Services unit or other departments to investigate or assign them to external expert investigators.

In 2021, the internal Audit Services unit completed an ethics program audit and provided recommendations for improvement.



The code of conduct and special investigations procedure include guidance for internal Audit Services staff in their review or investigation of conduct violations, fraud, or other accounting matters.

We walked through the fraud investigation process with internal Audit Services staff members, and in the sample case we reviewed, found it to be well designed and effectively implemented.

Why this matters

Fraud is often discovered by employees. It matters that they can safely report wrongdoing without fear of reprisal. Effective organizational processes and procedures for conducting thorough fraud investigations (including direction on when it is appropriate to contact police) are essential to recovering losses and protecting the organization's reputation. Poorly managed investigations can increase costs and lead to considerable reputational harm.

Recommendation

4. We recommend that BC Hydro implement a fraud investigation procedure to supplement its fraud risk policy.

[See the response from the auditee.](#)



Monitoring activities

Effective organizations regularly monitor and evaluate their operations to determine if they are functioning as intended and to adjust when needed to improve processes and internal controls. Fraud risk management program evaluations are important because fraud threats evolve, and innovative approaches are needed to respond to emerging threats.

BC Hydro has not established a Site C fraud risk management program for it to monitor and evaluate

What we looked for

We examined if BC Hydro performs ongoing fraud risk management program evaluations to determine whether it is functioning as intended on the Site C project.

[Learn more about the audit criteria.](#)

What we found

BC Hydro has not established a Site C fraud risk management program that can be monitored and evaluated.

BC Hydro has, however, performed some targeted Site C evaluations. For example, BC Hydro's internal Audit Services unit audited Site C's procurement and contract management processes and practices in 2017, and they completed an audit of Site C's payment verification controls in the fall of 2021. There were no major findings.

Why this matters

Fraud threats evolve and change. A process to monitor and report on the effectiveness of the fraud risk management framework at BC Hydro is essential to develop fraud risk management into an effective program that can be used at Site C to effectively manage fraud risks.

Recommendation

5. We recommend BC Hydro perform ongoing fraud risk management program evaluations at Site C and provide regular reports to its board of directors.

[See the response from the auditee.](#)



About the audit

We conducted this audit under the authority of section 11(8) of the *Auditor General Act* and in accordance with the Canadian Standard on Assurance Engagements (CSAE) 3001—Direct Engagements, set out by the Chartered Professional Accountants of Canada (CPA Canada) in the *CPA Canada Handbook—Assurance*. These standards require that we comply with ethical requirements and conduct the audit to independently express a conclusion against the objective of the audit.

A direct audit involves understanding the subject matter to identify areas of significance and risk, and to identify relevant controls. This understanding is used as the basis for designing and performing audit procedures to obtain evidence on which to base the audit conclusion.

We drew upon the principles of the Committee of Sponsoring Organizations of the Treadway Commission (COSO) fraud risk management framework as a source of audit criteria given its prominence as a recognized framework, but we did review other literature pertaining to fraud risk management as well.

The audit procedures we conducted included: conducting interviews with senior executive and the Site C project team, gathering and reviewing documents, selecting samples, conducting walk throughs of key processes, and assessing the design and implementation of relevant internal controls.

We believe the audit evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Our office applies the Canadian Standard on Quality Control (CSQC 1), and we have complied with the independence and other requirements of the code of ethics issued by the Chartered Professional Accountants of British Columbia that are relevant to this audit.

Audit report date: April 12, 2022



Michael A. Pickup, FCPA, FCA
Auditor General of British Columbia
Victoria, B.C.



Appendix A: Recommendations and auditee response

Recommendation 1: We recommend BC Hydro and Power Authority implement its new fraud risk policy and procedures.

Recommendation 1 Response: BC Hydro accepts this recommendation.

BC Hydro's commitment to fraud risk management has been long standing and applies to all areas of BC Hydro, including the Site C project. Our historical approach includes a Code of Conduct Policy and ongoing training, an Ethics Office and a Third-Party anonymous reporting line. These are all critical components of a fraud risk management program.

To strengthen our fraud risk management program, BC Hydro approved a specific fraud risk policy in January 2022. This policy and related procedures are being implemented to formalize the control processes that already exist and enhance the dialogue of fraud risk management throughout the company, thus aligning BC Hydro's fraud risk management program with best practices.

Recommendation 2: We recommend BC Hydro and Power Authority provide fraud risk management training to all staff.

Recommendation 2 Response: BC Hydro accepts this recommendation.

Currently, all of BC Hydro's employees complete Code of Conduct training annually, which includes examples of conflict of interest and violations of BC Hydro values. BC Hydro will include explicit fraud risk management related training going forward.



Recommendation 3: We recommend BC Hydro and Power Authority conduct regular fraud risk assessments for the Site C project and proactively identify and address additional potential fraud threats.

Recommendation 3 Response: BC Hydro accepts this recommendation.

The Site C project has had a comprehensive risk management process in place which includes a detailed project risk register. This project risk register considers certain risks that could result in potential fraud.

BC Hydro's first fraud risk assessment for Site C did not identify any significant control gaps. BC Hydro will conduct Site C fraud risk assessments on a periodic basis.

Recommendation 4: We recommend BC Hydro and Power Authority implement a fraud investigation procedure to supplement its fraud risk policy.

Recommendation 4 Response: BC Hydro accepts this recommendation.

BC Hydro is in the process of documenting a fraud investigation procedure which will formalize the responsibilities already in place and enhance the coordination of fraud related investigations across BC Hydro.

Recommendation 5: We recommend BC Hydro and Power Authority perform ongoing fraud risk management program evaluations at Site C and provide regular reports to its board of directors.

Recommendation 5 Response: BC Hydro accepts this recommendation.

BC Hydro has completed three separate internal audits on the Site C project with no major findings. The Site C team also undertakes routine payment data analysis that includes reviewing for potential fraud.

BC Hydro will perform ongoing evaluations of the complete fraud risk management program.



Appendix B: Audit criteria

Control environment

- 1.** BC Hydro's board of directors and senior management has formally committed to fraud risk management at Site C.
 - 1.1.** BC Hydro's board of directors and senior management has established and communicated an organizational fraud risk management program in policy that the Site C project is required to follow.
 - 1.2.** The board or the CEO has delegated a senior executive member with overall responsibility for fraud risk management on the Site C project.
 - 1.3.** Integrity, ethical values, and fraud risk management roles and responsibilities have been communicated to Site C employees.
 - 1.4.** Site C employees have received fraud risk management training.

Fraud risk assessment

- 2.** BC Hydro has performed Site C project fraud risk assessments to identify specific fraud schemes and risks, to assess their likelihood and significance, to evaluate existing fraud control activities, and to identify actions to mitigate residual fraud risks.
 - 2.1.** The Site C fraud risk assessment process involved relevant functional areas and levels of management in their fraud risk assessment processes recognizing that frauds could happen at any level or component of the project.
 - 2.2.** The risk assessment included consideration of various types of fraud schemes and fraud risks (both internal and external) that the Site C project could be subject to.
 - 2.3.** The risk assessment included estimates of the likelihood and significance of fraud schemes and risks before the application of fraud controls based on a range of factors unique to the organization, the Site C project, its industry, and its operating environment.
 - 2.4.** The risk assessment included existing fraud controls and their effectiveness the Site C project is subject to.
 - 2.5.** The risk assessment included estimates of the likelihood and significance of residual fraud risks after the application of existing fraud controls based on a range of factors unique to the organization, the Site C project, its industry, and its operating environment.
 - 2.6.** The risk assessment included the design of a combination of preventative and detective controls to mitigate residual fraud risks.



Control activities

- 3.** BC Hydro has formally implemented fraud preventative and detective controls on the Site C project that align with the Site C fraud risk assessment.
 - 3.1.** Fraud preventative and detective controls have been formally implemented on the Site C project through policies and procedures.
 - 3.2.** Fraud preventative and detective controls align with the Site C fraud risk assessment, including the implementation of preventative and detective controls to mitigate residual fraud risks after the application of existing fraud controls.

Fraud investigation and corrective action

- 4.** BC Hydro has established a communication process to obtain information about potential fraud at the Site C project and has deployed a coordinated approach to investigation and corrective action to address potential frauds.
 - 4.1.** BC Hydro has established a communication process (including a whistleblower process) to obtain information about potential fraud at the Site C project.
 - 4.2.** BC Hydro has established a fraud investigation and response protocol that defines appropriate and timely investigations and expected competencies of assigned or contracted investigators.
 - 4.3.** BC Hydro has established a process to investigate potential fraud on the Site C project, considering the scope, severity, credibility, and implications of the matter.
 - 4.4.** Investigators communicate the results of investigations to the appropriate internal authority and, when necessary, to appropriate external third parties.
 - 4.5.** BC Hydro determines discipline, remediation, asset recovery, or other legal processes to address the findings of investigations as needed.



Monitoring activities

5. BC Hydro performs ongoing Fraud Risk Management program evaluations to determine whether it is functioning as intended on the Site C project.
 - 5.1. BC Hydro has a process to monitor the Site C fraud risk management activities, evaluate and report the results, and improve the process.
 - 5.2. BC Hydro determines the appropriate scope and frequency of its fraud risk management monitoring activities at Site C.
 - 5.3. BC Hydro has established measurement criteria to evaluate and report its fraud risk management program for Site C.
 - 5.4. BC Hydro's board of directors assesses the results of Site C fraud risk management evaluations and modifies fraud risk management processes and control activities as required.





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All images are courtesy of BC Hydro.

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