

Internal Audit, External Audit (CAG) & Frauds

Chanda Pandit, IAAS

Principal Accountant General (A&E), Telangana

Dr. Sanjay Kamineni, IAAS

Sr. Dy. AG (Audit) & Director, CoEFA



Structure of Session

- Internal Audit
- External Audit by CAG
- IA v EA v Vigilance v Police
- Fraud
- Fraud v Corruption
- Case Studies
- Strengthening the Internal Audit
- Summary

Why This Topic Is Critical for Government Systems

Complex Procurement & Contract Management

High-value Infrastructure spending

Weak Internal Controls in Many Ministries/Departments

Fraud & Corruption in Public Procurement, Works, Grants & DBT

Rising Expectations of Transparency, Compliance & Accountability

Recurring CAG findings across years

CAG Reports repeatedly state:

"Internal controls remained weak, increasing the risk of fraud and misappropriation."

Three Lines of Defence

1

FIRST LINE — MANAGEMENT

- Responsible for Controls
- Own Processes, Transactions
 & Risk Management
- Must enforce compliance with GFR/DFPR/Procurement Norms

2

SECOND LINE — INTERNAL AUDIT

- Independent & Objective Assurance
- Evaluates Risk Management, Controls
- Ensure Compliance with Rules/Norms
- Detects Irregularities Early
- Advises on Process Improvement

3

THIRD LINE — EXTERNAL AUDIT CAG

- Constitutional Authority under Articles 148–151
- Examines Compliance, Performance, and Financial Integrity
- Provides Assurance to Legislatures & Public through its Audit Reports

Internal Audit: Definition

Institute of Internal Auditors (IIA) Definition:

Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations.

It helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

IA's Role in Governance, not Policing

- IA strengthens systems it doesn't punish people
- IA assures management not prosecute staff
- IA focuses on prevention not punishment
- IA is advisory + assurance not investigative
- IA's role is to add value not catch mistakes
- IA evaluates governance processes

Internal Audit supports management by strengthening governance systems and controls — it does not punish individuals or act as a policing/vigilance body.

EXTERNAL AUDIT BY CAG

Constitutional Mandate

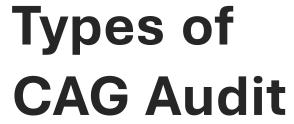
CAG's Constitutional Mandate (Articles 148–151)

- Article 148 Appointment & Independence: CAG appointed by President, Removal only like a Supreme Court Judge, Salary charged to Consolidated Fund of India
- Article 149 Duties & Powers: Audit of Union & State accounts, Audit of Government Companies (DPC Act), Audit of authorities receiving government funds
- Article 150 Form of Accounts: CAG advises the Government on how accounts should be kept
- Article 151 Reporting to Parliament/Legislatures: Audit Reports submitted to President/Governor; Placed before Parliament/State Legislature via PAC/PUC

CAG is fully independent of Executive — a cornerstone of Indian Democracy



Compliance Audit: Checks adherence to rules, GFR, DFPR, and Procurement Manuals, Scheme Rules





Financial Audit: Examines Financial Statements (PSUs, Autonomous Bodies, LSGs)



Performance Audit: Evaluates Economy, Efficiency & Effectiveness (3Es) of Schemes/Programmes



CAG audits go beyond finances —we assess **outcomes** and **quality of the service provided**

CAG Audit Cycle

1. Planning Stage

Stage

2. Execution

3. Reporting Stage

4. Legislative Scrutiny

Identify Universe and Assess Risks

Selecting Units (CA, FA) and Topics (PA, SSCA)

Test checks

Evidence collection

Site visits

Beneficiary verification

Inspection Report

Draft Paragraph (DP)/ Draft Audit Report

Departmental replies

Inclusion in Audit Report PAC / COPU discussion

Directions for corrective action

Need for Audit

Audit exists to:

- 1. Monitor, Assess & Analyse Organisational Risks
- 2. Review and Confirm Compliance with Rules & Laws
- 3. Provide Assurance to the Management
- 4. Report Suspected/Proven Financial Irregularities
- 6. Promote Economy, Efficiency & Effectiveness (3Es)
- 7. Recommend Process & Policy Improvements

Audit Methodology

Audit follows a structured cycle:

Identify Audit Universe

Risk Assessment & Prioritisation

Prepare Annual Audit Plan & Rolling Plans

Conduct Entry Conference

Field Audit & Evidence Collection

Draft Observations/Reports

Exit Conference

Final Reporting

Follow-up

Risk Assessment Framework

Audit Evaluates Risk Based On:

- Materiality (Expenditure, Revenue, Assets)
- Volume & Complexity
- Past Audit Findings (CAG & IA)
- Control Weakness Level
- Fraud Vulnerability
- Public Importance & Sensitivity
- IT System and their controls

Risk Grading:

- High Risk
- Medium Risk
- Low Risk

CVC Guidelines: "Departments shall identify vigilance-sensitive units and assess their risk profile regularly."

Risk assessment ensures audit focuses on highimpact areas first.

Audit Evidence

Good Evidence Must Be:

- Sufficient enough to support finding
- Appropriate relevant to the issue
- Reliable credible source
- Traceable documented
- Verifiable independently checkable

Relevant Standards:

- ISSAI 1700 / 3000
- CAG Auditing Standards

Findings must be evidence-based, not opinion-based.

Audit Reporting

Standard Reporting Elements:

- Observation (what is wrong)
- Criteria (rule violated GFR, DFPR, Manual)
- Condition (facts found)
- Cause (why it happened)
- **Effect** (financial / operational impact)
- Recommendation (fixing the issue)
- Management Response
- Timeline for compliance

GFR 33(2)

 "Serious irregularities shall be promptly reported to the competent authority."

Internal Audit vs External Audit

Aspect	Internal Audit	External Audit (CAG)
Authority	Management function	Constitutional authority
Focus	Controls, Compliance, Efficiency	Accountability, Legality, Performance
Reporting	To Management/Board	To Legislature, Public
Disclosure	Internal	Public
Objective	Improve Operations	Ensure Accountability
Scope	Flexible, Management-driven	Mandate-driven, Standardised
Independence	Limited	High (Constitutional)
Orientation	Preventive, Advisory	Assurance and Recommendation
Outcome	Process Improvement	Legislative Action, Systemic Reforms

IA vs EA Process

Planning

Execution

- Report ??
 - IA Management
 - EA Management Legislature Public Domain PAC

2

Differences

Internal Audit?

External CAG Audit?

Vigilance Officer?

CBI/ACB?

INTERNAL AUDIT - Finds Procedural Mistakes

Internal Audit checks:

- Was tender published properly?
- Were quotations evaluated correctly?
- Were approvals taken from the competent authority?
- Was stock entry done?
- Was payment made as per contract?

If they find issues:

- Report procedural lapses,
 e.g.:
- Wrong tendering process
- Missing technical evaluation
- Delayed stock entry
- Non-deduction of penalty clauses

EXTERNAL AUDIT (CAG) - Checks Systemic Issues

CAG auditors visit the department to examine:

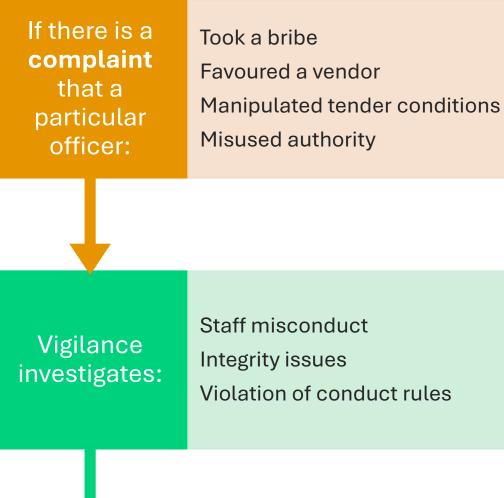
- Was government money used efficiently?
- Was procurement as per GFR, CVC guidelines, CVC circulars?
- Was the purchase necessary?
- Did it result in wasteful expenditure?
- Were funds diverted?
- Was equipment actually utilised?

If they find issues:

- Report systemic lapses, e.g.:
- Unnecessary purchase → wasteful expenditure
- Neglecting open tender → lack of transparency
- Non-utilisation of equipment → idle assets

VIGILANCE

Checks Misconduct or Corruption



If they find issues:

They recommend disciplinary action:

Suspension

Charge sheet

Departmental enquiry

CBI / ACB

Investigate Criminal Offence

Bribe paid by vendor

- Fake bills
- Ghost companies
- Collusion
- Embezzlement of funds

CBI/ACB registers:

- FIR
- Conducts raids
- Seizes documents
- Arrests involved officials
- Files chargesheet in court

If they find issues:

- They prosecute for offences under:
- Prevention of Corruption Act
- IPC sections for fraud, conspiracy

PROCESS & DIFFERENCES: OVERSIGHT & ENFORLIMENT FUNCTIONS

INTERNAL AUDIT (Within Org.)







EXTERNAL AUDIT (Independent)







VIGILANCE (Anti-Corruption)







(Law Enforcement)

POLICE



Plan Scope

Examine Operations/Controls

Report to Management/Board

Improve Efficiency & Compliance

Define Audit Objectives

Verify Financial Statements & Execution of Schemes

Report on Financials & Scheme Performance to Shareholders/Public

Financial & Programmatic Accountability

Monitor Misconduct

Investigate Complaints/Fraud

Recommend Disciplinary Action

Prevent Corruption

Receive Crime Report

Investigate
Offense/Evidence

Arrest Suspects

Uphold Law & Order

FOCUS: Operational Improvement | Financial Accuracy | Integrity & Ethics | Public Safety & Crime

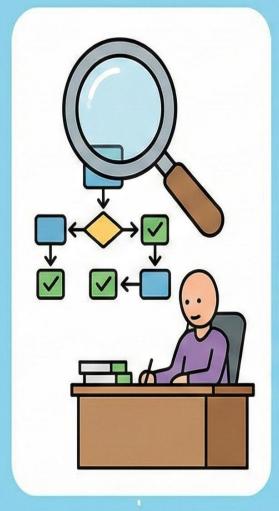
REPORTING: Internal Mgt. | External Stakeholders | Internal Authority | Judicial System





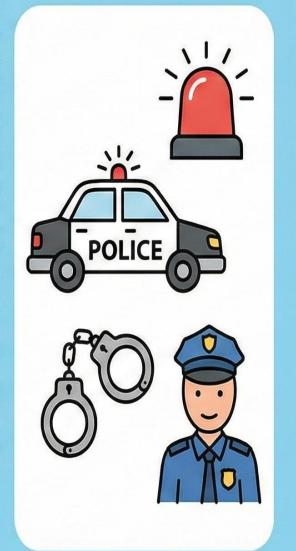












Fraud: Definition (Black's Law Dictionary)

 An intentional perversion of truth for the purpose of inducing another in reliance upon it to part with some valuable thing belonging to him/her or to surrender a legal right, and fraudulent means acting wilfully and with specific intent to deceive or cheat, ordinarily for purposes of either causing some financial loss to another or bringing about some financial gain to oneself

Essential Elements of Fraud



Conscious Wrongdoing & Planning.

CONCEALMENT:

Hiding Records & Backdating.

MISREPRESENTATION:

Faking Documents & Inflating Quantities.

ABUSE OF POSITION:

Misusing Authority.

RESULT:

Loss to Govt & Unfair Gain.

Essential Elements of Fraud

1. Intent

- Conscious wrongdoing
- Planned or premeditated

2. Concealment

- False records
- Missing documents
- Backdated entries

3. Misrepresentation

- Fake bills, forged signatures
- Inflated quantities
- False certifications

4. Abuse of Position

Misusing decision-making authority

5. Result

- Loss to Government
- Unfair gain to external/internal actors

Fraud vs Corruption

Fraud

- Intentional deception
- Fake documents/records
- Financial manipulation
- Hidden, internal
- **Example:** Fake invoices, inflated quantities

Corruption

- Abuse of official position
- Bribery, kickbacks, favoritism
- Collusion with vendors
- Often external + internal
- Example: Awarding a contract for bribe

Fraud vs Corruption (Legal Distinction)

Fraud is Not Always a Crime (but usually is):

- Violation of GFR/DFPR/Procurement Manuals
- Can occur without bribery
- Dealt with via Disciplinary
 Action + Recovery

Corruption IS a Crime (PC Act, 1988):

- Section 7 → Taking bribe
- Section 12 → Giving bribe
- Section 13 → Criminal Misconduct

Many scams involve **both** fraud (false documents) **and** corruption (kickbacks)

Fraud Triangle

Opportunity

Internal Controls:

- · None in place
- · Not enforced
- · Not monitored
- · Not Effective

No segregation of duties Too much trust Poor "tone at the top"

Rationalization

"I don't get paid what I'm worth"

"Everyone else is doing it"

"If they don't know I'm doing it, they deserve to lose the money"

"I intended to pay it back"

"Nobody will miss the money"

Pressure/Motivation

External:

- Debt, greed
- Lifestyle needs
- Life pressures
- Illicit activities: vices, gambling, drugs

Internal:

- · Pressure to perform
- Too much work

The Fraud Diamond

Adds a fourth dimension: Capability

The fraudster has:

- Position of Authority
- Technical Skills
- System Knowledge
- Access to Sensitive Information
- Manipulation Ability

Why it matters in Government:

- Officials with the Sanctioning Authority
- Engineers/Storekeepers with Measurement Control
- IT Staff Manipulating Databases
- Accountants Processing Payments

How Fraud & Corruption Often Overlap

Fraud Without Corruption

- Fake bills created by an internal employee
- Ghost employees in payroll
- Duplicate invoices

Corruption Without Fraud

- Taking a bribe for issuing a licence
- Ignoring substandard work knowingly

Fraud + Corruption Together (Most Common)

- Collusive procurement
- Fake MB entries approved for kickback
- Awarding tenders to cartelised vendors
- Scheme funds diverted with beneficiary collusion



Early Warning Signals of Fraud

Transaction-Level Red Flags

Behavioural Red Flags

Organisational Red Flags

Sudden spike in expenditure

Multiple payments to the same vendor

Purchases clustered near year-end

Repetitive deviations from procurement norms

High number of "Urgent" or "Emergency" purchases

Staff avoiding leave

Unusual lifestyle changes

Resistance to sharing files/data

Requests for out-ofprocess approvals

Over-friendly vendor relationships

No segregation of duties

Poor documentation culture

Weak IA

Missing physical verification

Why Fraud Occurs:

Systemic Gaps in Governance

Root Causes of Fraud in Government

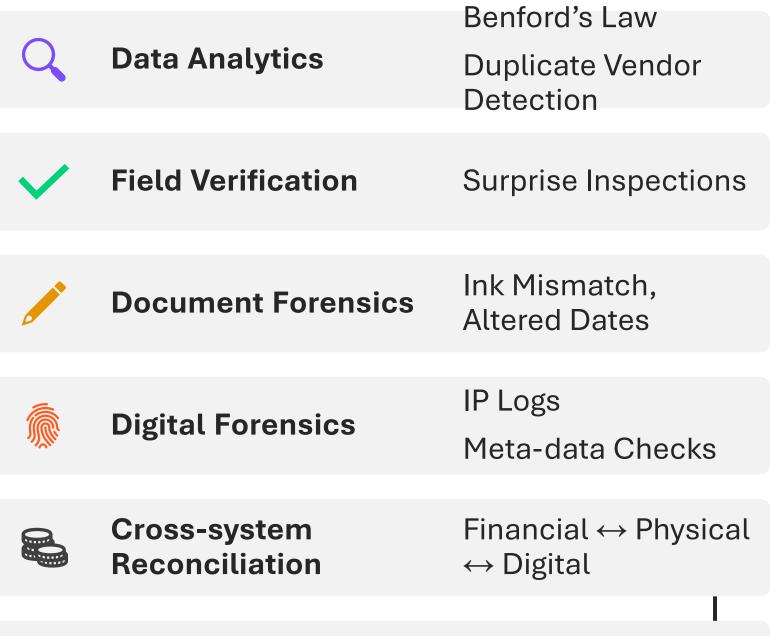
- Weak internal controls
- Excessive discretionary powers
- Poor documentation standards
- Inadequate segregation of duties
- Manual processes prone to manipulation
- Limited IT system validations
- Lack of real-time monitoring
- Delayed reconciliations
- Poor contract management
- Weak Internal Audit

CAG Recurring Note

• "Irregularities continued due to absence of adequate internal controls."

How Internal Audit

can Detects Fraud





Trend & Ratio Analysis

Spikes, Deviations, Patterns

Role of Internal Audit in

Preventing Fraud

Internal Audit Minimises Opportunity By:

- Ensuring segregation of duties
- Strengthening authorisation controls
- Ensuring procurement rules (GFR/DFPR/Manuals)
- Ensuring documentation integrity
- Testing high-risk areas (procurement, works, PFMS)
- Reviewing system logs & digital workflows
- Identifying duplicate/related vendors
- Conducting surprise checks
- Verifying physical assets & stock
- Ensuring timely reconciliations

Internal Audit Strengthens the System By:

- Recommending process improvements
- Identifying emerging fraud patterns
- Reporting serious irregularities promptly (GFR 33(2))

Internal Audit reduces fraud opportunity — the most controllable element of the fraud triangle.

Procurement Rules

Government of India

Procurement Governed By:

- GFR 2017 (Rules 144–173)
- Manual for Procurement of Goods (2022)
- Manual for Procurement of Works (2022)
- Manual for Procurement of Consultancy/Services (2022)
- DFPR (Delegation of Financial Powers Rules)
- GeM Procurement Guidelines
- CVC Guidelines

Covers the Entire Procurement Cycle:

- Need assessment → Tendering → Evaluation
- Award → Contract Management → Payment → Closure

Procurement is high-value, high-risk, and requires strict rule compliance.



Why Procurement is Highly Fraud-Prone

High Vulnerability Areas:

- Need artificially created
- Tailor-made specifications
- Cartelisation among bidders
- Manipulated evaluation
- Post-tender negotiations
- Contract amendments to favour suppliers
- Non-delivery or partial delivery
- Inflated invoicing

High Value + Discretion + Documentation Loopholes = Fraud Opportunity

Procurement Red Flags (High-Risk Indicators)

Red Flags During Tendering

- Repeated participation by the same limited vendors
- Identical quotes from multiple bidders
- One bidder consistently winning tenders
- Abnormally low/high bids without justification
- Technical specifications tailored to one vendor

Red Flags in Evaluation

- Sudden changes in evaluation criteria
- Deviations from the approved tender conditions
- Committee minutes without proper justification

Red Flags in Award

- Immediate re-tendering without clear reasons
- Awarding to higher bidder citing "technical disqualification"

Works Contracts

Red Flags

Common Fraud Patterns in Works & Engineering

- Inflated measurements in the Measurement Book (MB)
- Fake Site Photographs / GPS Tags
- Excess Quantities beyond Tendered Scope
- Backdated entries in MB
- Poor-quality Materials despite Higher Billing
- Undue Extension of time without penalty
- Deviations >10% without Competent Approval
- Subcontracting without permission
- Measurement Books lacked authenticity and were not verified by engineers.

Digital Transactions

Red Flags

Financial Irregularities

- Multiple payments against the same invoice
- Same bank account used for multiple vendors
- Manual override of system validations
- Bills passed without e-Sanction
- Payments processed just before year-end
- Mismatch between PFMS and Cash Book
- Duplicate beneficiary entries
- Use of personal accounts for scheme payments

Internal Audit Must Check:

- Maker–checker separation
- Beneficiary Aadhaar/bank validation
- Real-time exception reports

GeM Procurement

Red Flags

Vendor-Side Risks

- New vendor created just before procurement
- Vendor with poor past performance winning contracts
- Fake or unverifiable address
- Single-bid participation across multiple procurements

Buyer-Side Risks

- Excessive use of **Direct Purchase** mode
- Unjustified use of PAC (Proprietary Article Certificate)
- Same buyer repeatedly selecting the same seller
- Rate far above market or previous procurements

System Indicators

- Delivery marked without GRN verification
- Multiple CRACs issued without physical receipt

Revenue Receipts: High-Risk Areas

Common Revenue Fraud Patterns

- Under-assessment of tax/fees/fines
- Suppression of receipts (cash not accounted)
- Short levy of duties, penalties, interest
- Favourable assessments to specific entities
- Manipulating challans or backdated receipts
- Under-reporting of income in revenue-generating units
- Non-remittance of collected revenue

Examples from CAG Reports

- Short collection of stamp duty
- Incorrect application of fee/royalty rates
- Under-charging user fees in public utilities

HR & Payroll Fraud Indicators

Common HR/Payroll Frauds

- Ghost Employees (non-existent staff drawing salary)
- Duplicate Bank Accounts used for salary credit
- Manipulated Service Books
- False LTC claims / TA-DA claims
- Fake Medical Reimbursement Bills
- Irregular Overtime Payments
- Unauthorized Increments / Promotions

Assets & Stores:

Fraud and Misappropriation Indicators

Fraud Patterns in Stores/Assets

- Non-existent stock shown in registers
- Pilferage of consumables and spare parts
- Wrongful issue/return entries
- Inflated consumption
- Unrecorded receipts of materials
- Scrap sale manipulation
- Tampering of stock registers
- Misuse of government vehicles/assets

Common Documentation Gaps

- Missing entries in bin cards
- Stores ledger not tallying with physical stock
- No annual physical verification

Documentation

Risk Areas

Common Document Manipulations

- Backdated entries
- Different ink types
- Cuttings/overwriting without attestation
- Altered signatures
- Tampered seals/stamps
- Missing supporting documents
- Fake bills/invoices
- Fabricated delivery challans
- Manipulated stock/MB entries

Digital Forensics

Red Flags

Suspicious System Behaviours

- Logins outside office hours
- Sudden password resets
- Multiple failed login attempts
- Deleted or missing system logs
- Unauthorised privilege escalation
- Same IP used for multiple bidders (tender fraud)
- Backdated digital approvals
- Lack of an audit trail for key financial actions

Why Internal Audit Misses Fraud

- Not a management priority
- Less/No Independence
- Limited Staff or Zero No IA
- IA staff not trained/qualified
- IA reports checklists, not risk
- Very limited field verification
- Over-dependence on documents provided by a fraudster
- No analytics capability
- Cultural reluctance to flag sensitive cases



Fraud hides in places - IA never checks

CAG Often Ends Up Doing the Internal Audit's Job

Where Internal Audit Signs Off, CAG Finds Irregularities

- IA certifies **procurement**, CAG uncovers cartelisation & inflated rates.
- IA approves **property tax records**, CAG finds thousands of unassessed properties.
- IA checks **billing summaries**, CAG finds *meter bypass, overrides & revenue leakage*.
- IA verifies **vouchers**, CAG detects stock manipulation, fake consumption & ghost beneficiaries.
- IA accepts **RA bills**, CAG notes non-existent or incomplete works.
- IA reviews **HR records**, CAG finds *ghost employees & irregular payrolls*.

Core Message

- Internal Audit is supposed to be the First Line of Defence.
- But in many cases, CAG becomes the Only Line of Defence.
- Strong Internal Audit → Fewer CAG Audit Paragraphs
- Robust IA reduces irregularities pointed by CAG

Creating a FraudResistant Organisation

- Tone at the Top / Management Priority
- Organisational Culture
- Clear SOPs/Checklists
- E-governance Systems
- 100% Digital Payments
- Surprise Audits
- Periodic and Strong Internal Audit
- Strong Vigilance Mechanism

What Every Officer Must Know

GFR 2017

Delegation of Financial Powers

Procurement Manuals (Goods/Works/Consultancy)

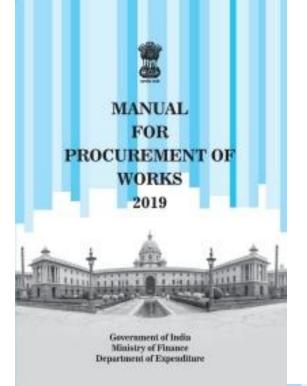
CVC Guidelines

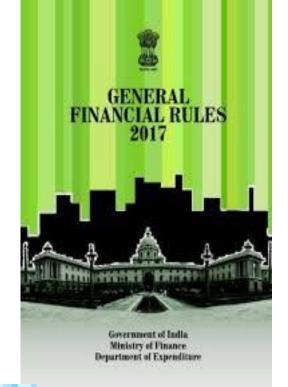
Treasury Rules

Budgeting

PFMS & DBT Rules

CPWD/State Works Manual









Published under the authority of Director General, CPWD, Nirmon Bhawan, New Delhi









MANUAL FOR PROCUREMENT OF GOODS

Second Edition, 2024





(Updated June, 2022)



To Sum Up

Fraud hides in plain sight

Documents lie — Rule based verification doesn't

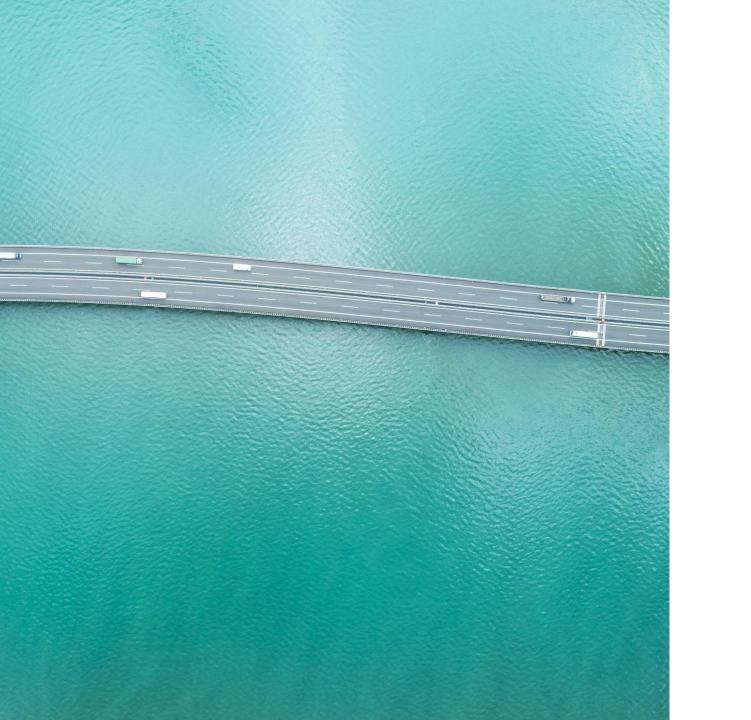
Internal Audit is not policing, it is Assurance +
Improvement

IA Goal is not to catch thieves but to fix systems

Strong IA prevents fraud long before external audit detects it

Good Governance begins where

Internal Audit is Strong



Thank You

Objective 1:

Monitor, Assess & Analyse Risks

Internal Audit evaluates:

- High-risk processes (Procurement, Works)
- Design & Effectiveness of Internal Controls
- Vulnerabilities in Financial Transactions
- Deviations from Normal Patterns
- Systemic Bottlenecks (Manual, Digital, Policy Gaps)

GFR Rule 33:

• "The Ministries shall maintain adequate and effective internal control systems."

CVC Vigilance Manual:

• "Risk assessment of all vigilance-sensitive areas shall be carried out periodically."

Objective 2:

Review & Confirm Compliance

Internal Audit must verify adherence to:

- GFR 2017 (General Financial Rules)
- DFPR (Delegation of Financial Powers Rules)
- Manual for Procurement of Goods/Services/Works (2022)
- Treasury Rules & Budget Manual
- Scheme Guidelines (Centrally Sponsored & State)
- HR & Establishment Rules
- Statutory Taxes GST, Income Tax, PF, Pension
- CVC Instructions
- Departmental SOPs

GFR "Internal checks shall be exercised to ensure compliance with rules and orders governing receipts and expenditure."

Objective 3:

Provide Assurance to Leadership

Internal Audit Provides Assurance To:

- Secretary / Head of Department
- Audit Committee / Board
- Senior Management

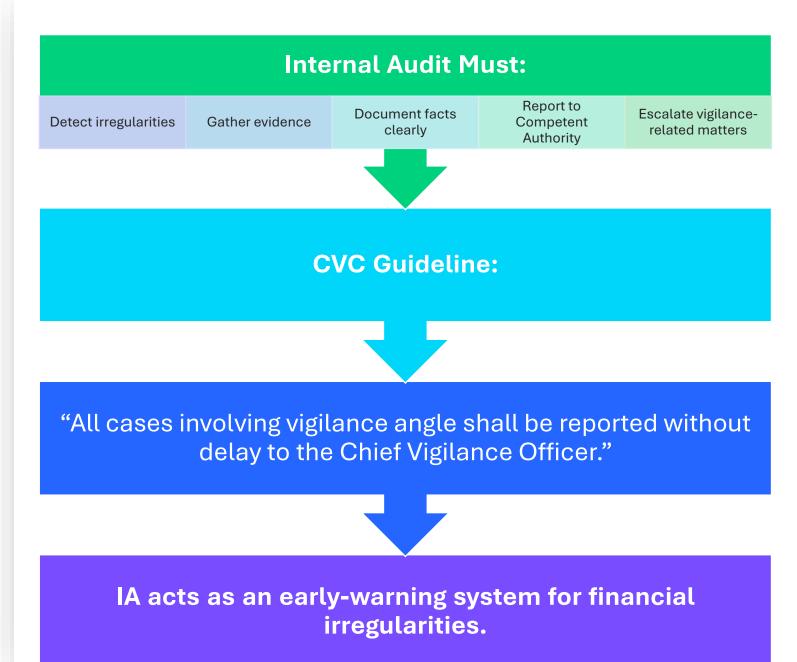
Assurance Covers:

- Effectiveness of internal controls
- Adequacy of risk mitigation
- Strength of governance practices
- Compliance with rules and procedures

IA gives leadership confidence that the organisation is functioning with integrity and control

Objective 4:

Reporting Financial Irregularities



Objective 5:

Promote Economy, Efficiency & Effectiveness (3Es)

IA Evaluates Whether:

- Resources are used economically
- Processes run efficiently
- Scheme/Project objectives are effectively achieved

Examples:

- Idle assets
- Delayed projects
- Wasteful procurement
- Redundant processes

IA supports value-for-money in all government operations.

Objective 6:

Recommend Process & Policy Improvements



IA Recommends Improvements In:

SOPs and workflows
Internal controls
Procurement systems
IT & automation
Documentation standards



Internal Audit Manual:



"Internal Audit should guide management by suggesting improvements in systems and procedures."



IA's recommendations help modernise and strengthen the organisation.

Role of Internal Audit:

Handling Fraud vs Corruption

Internal Audit Addresses Fraud By:

- Detecting irregularities
- Reviewing transactions & controls
- Verifying documents, records, approvals
- Reporting financial irregularities (GFR 33(2))
- Strengthening controls to prevent recurrence

Internal Audit Does NOT:

- Conduct criminal investigations
- Conduct sting operations
- Determine corruption or culpability
- Undertake punitive action

Who Handles Corruption?

- CVO (Chief Vigilance Officer)
- Vigilance Directorate
- State ACB / CBI
- Lokpal/Lokayukta (as applicable)