

**MINUTES**  
**8<sup>th</sup> MEETING OF 2021**  
**ANTI-CORRUPTION COMMISSION**  
**23 NOVEMBER 2021**  
**COMMISSIONS SECRETARIAT**

**COMMISSION MEMBERS PRESENT:**

Sophia Harris	Chairman
Kenrick Hall	Member
Kadi Pentney	Member
Adrian Pope	Member
Simon Whicker	Member

**APOLOGIES:**

N/A

**SECRETARIAT MEMBERS PRESENT:**

Marilyn Conolly	Manager
Richard Oliver	Senior Investigator

**1. Meeting called to Order**

The meeting was called to order at 9:30am.

**2. Confirmation of Minutes**

The minutes of 24 August 2021, 2 September 2021, and 3 September 2021 were confirmed as presented.

**3. Conflicts of Interest**

It was noted that there were no conflicts of interest to date (save as previously disclosed) and each member was reminded of their obligation to disclose and recuse themselves should any conflict of interest arise in relation to any new matters arising during the course of the meeting.

**4. Matters Arising from Previous Minutes**

**a. Amendments to the Anti-Corruption Act**

Member Gus Pope sent comments back to Legal Drafting regarding the status of the requested amendments to the Anti-Corruption Act. The Senior Investigator will follow-up with the Office of the Director of Public Prosecutions.

**b. Assessment of ACC Re: Jakarta Principles**

The Solicitor General's Chambers is supportive of this project and is seeking a scope of the work and commitment entailed in this assessment. The Manager will follow up.

**c. Advice Re: Structure of the ACC**

The Chairman is meeting with His Excellency, The Governor on Thursday 25 November.

**d. Meeting with AG**

The Chairman and Member Gus Pope are due to meet with the AG tomorrow on the matter of 1) public officers, 2) confiscation orders, and 3) civil recovery.

**e. Meeting with DG**

The ACC had a meeting with the Deputy Governor to provide an update on ACC activities.

**f. ACC 2020/21 Annual Report**

The Manager will circulate a copy of the draft annual report to ACC Members.

**g. SPL – Conflicts of Interest Process/Policy for ACC**

The finalised conflicts of interest process/policy will be circulated to all ACC Members

**h. MOUs with WORC and Ombudsman's Office**

The Ombudsman's office is in the process of completing this MOU. Discussion on the MOU with WORC will be deferred to the next meeting.

**i. Discussion about MOUs with AG's Consent**

This was discussed at the last meeting and as such can be removed from the Agenda.

**5. New Business**

**a. ACC Complaints Process**

Members discussed the current ways that complaints have been received by the ACC. It was agreed that reports of corruption need to be made in writing in order to be recorded as a complaint.

**b. Expiration of Members' Terms**

The terms of three ACC members will expire in 2022 and all are non-renewable. Members agreed that the ACC should aim to have new members which will include a lawyer with a criminal law background, as well as someone who is a former RCIPS officer. This issue will be raised again at the next meeting.

**6. C-FATF Related Updates**

The ACC Chairman and the Senior Investigator continue to attend CFATF meetings as required. The Secretariat will continue to submit quarterly statistics as required.

**7. National Risk Assessment (NRA) Related Updates**

There was nothing to discuss on this matter.

**8. Operational Update**

**a. New/TBC Corruption Reports/Complaints**

There were seven new report/complaint to be considered as follows:

- i. ACC/COMP/2021/008 – to be discussed at the next meeting.

- ii. ACC/COMP/2021/009 – to be discussed at the next meeting.
- iii. ACC/COMP/2021/010 – to be discussed at the next meeting.
- iv. ACC/COMP/2021/011 – to be discussed at the next meeting.
- v. ACC/COMP/2021/012 – to be discussed at the next meeting.
- i. ACC/COMP/2021/013 – to be discussed at the next meeting.
- ii. ACC/COMP/2021/014 – Members agreed for this to proceed to a full investigation.

**b. Existing Corruption Reports/Complaints**

The Commission was informed that since inception (1<sup>st</sup> Jan. 2010) there have been 154 investigations registered by the Commission, of which:

- i. 3 are 'pending' awaiting further or sufficient information which may make it appropriate to make further investigations;
- ii. 130 have been concluded (or have not met the threshold or fallen under the remit of the Commission);
- iii. 10 have been transferred to other investigative units for action;
- iv. 11 are now under current active investigation; and
- v. 0 is being assessed/considered.

The internal spreadsheet which provides details of the investigations will continue to be updated on a monthly basis.

**9. Any Other Business**

- a. There was no other business.

**10. Action Items**

- a. Member Gus Pope will follow-up regarding the amendments to the Anti-Corruption Act;
- b. The Chairman will liaise with the Attorney General related to matters discussed;
- c. The Secretariat will draft correspondence in relation to any reports/complaints; and
- d. The Secretariat will continue to provide the necessary statistics for the CFATF and NRA reporting as required.

**11. Items to be Discussed at the Next Meeting**

- a. Operational Update
- b. Amendments to the ACL
- c. Assessment of ACC Re: Jakarta Principles

**12. Next Meeting**

The date of the next meeting was agreed for Tuesday 22 February 2022.

**13. Adjournment**

The meeting was adjourned at 1:00pm.

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**Sophia Harris**

**CHAIRMAN**

**ANTI-CORRUPTION COMMISSION**