

**MINUTES**  
**5<sup>th</sup> MEETING OF 2021**  
**ANTI-CORRUPTION COMMISSION**  
**24 AUGUST 2021**  
**COMMISSIONS SECRETARIAT**

**COMMISSION MEMBERS PRESENT:**

Sophia Harris	Chairman
Kenrick Hall	Member
Kadi Pentney	Member
Adrian Pope	Member
Simon Whicker	Member (via Zoom)

**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 9:36am.

**2. Confirmation of Minutes**

The minutes of 13 April 2021 and the minutes of 26 May 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 provided an update on his efforts regarding the status of the requested amendments to the Anti-Corruption Act from Legal Drafting. He will continue to follow-up.

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

This assessment with the Solicitor General's Chambers is ongoing.

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

Members noted the need for the ACC's independence and discussed budgetary constraints.

**d. Commissions Secretariat Manager**

Members welcomed the new Manager and expressed gratitude for the work and support of the former Manager.

**e. Meeting with AG**

A letter was sent to the Attorney General querying Members' status as 'public officers' and the ACC Chairman will follow up on this issue. A meeting has been set with the Attorney General's Chambers to discuss confiscation orders and the DPP's office.

**f. Meeting with DG**

A meeting with the Deputy Governor was arranged to provide an update on ACC activities.

**5. New Business**

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

Members discussed a new annual report format to better reflect the Commission's work.

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

Members reviewed the draft prepared and approved this in principle.

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

Members agreed to try to secure MOUs with WORC and the Office of the Ombudsman.

**d. Discussion about MOUs with AGs Consent**

Members agreed that the issues discussed were already addressed in the draft amendments to the law.

**6. C-FATF Related Updates**

The 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 Related Updates**

The ACC submitted a report to the NRA which included statistics and examples of case studies within the NRA report. The FRA submitted a report to the ACC about people trafficking.

**8. Operational Update**

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

There was one new report/complaint to be considered as follows:

- i. ACC/COMP/2021/007 – at the meeting of 24 August 2021, Members agreed that the matter was not a corruption offence. The ACC will formally advise the complainant.

**b. Existing Corruption Reports/Complaints**

The Commission was informed that since inception (1<sup>st</sup> Jan. 2010) there have been 153 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. 129 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. 1 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**

Members discussed options to share the business of the Commission in a confidential manner.

**10. Action Items**

- a. Member Gus Pope will follow-up with Legal Drafting 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 will be agreed via round robin.

**13. Adjournment**

The meeting was adjourned at 2:05pm.

---

**Sophia Harris**

**CHAIRMAN**

**ANTI-CORRUPTION COMMISSION**