

MINUTES
1st MEETING OF 2022
ANTI-CORRUPTION COMMISSION
24 FEBRUARY 2022
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 9:33am.

2. Confirmation of Minutes

The minutes of 23 November 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

Feedback was received from the Office of the Director of Public Prosecutions and Member Gus Pope will follow up.

b. Assessment of ACC Re: Jakarta Principles

The Manager will write to the Solicitor General's Chambers on behalf of the ACC Chairman to determine if they have the staff capacity to undertake this project.

- c. Advice Re: Structure of the ACC**
The Secretariat will proceed with efforts to secure an in-house counsel.
 - d. Meeting with AG**
The Secretariat will circulate Member Gus Pope's File Note of the meeting.
 - e. ACC 2020/21 Annual Report**
The Annual Report was submitted to The Governor. The Secretariat will confirm if this has been tabled in the Parliament and update all minutes on the ACC website.
 - f. SPL – Conflicts of Interest Process/Policy for ACC**
The conflicts of interest process/policy will be added to a newly created resource page for members.
 - g. MOUs with WORC and Ombudsman's Office**
The Secretariat will follow up on the MOU with the Office of the Ombudsman, which is seeking a new Head, and with WORC.
 - h. Expiration of Members' Terms**
As three members' terms are expiring, the issue of new members to the ACC was discussed.
 - i. ACC Budget Resources**
The Manager discussed new resources and potential communication tools for the ACC
- 5. New Business**
 - a. ACC MOU with RCIPS**
Members were grateful for the continued partnership with the RCIPS.
 - b. ACC access to IMSS**
Members were grateful for the continued partnership with WORC.
 - c. Meeting with the new DPP**
The Manager is arranging for members to meet the new DPP at an Extraordinary ACC meeting
 - d. ACC Chairman presentation invitations**
The Chairman has been invited to present at two events.
 - e. ACC staff training**
The Trainee Investigator is participating in the RCIPS Recruit training program as a part of the ACC's continued partnership with RCIPS. The ACC Analyst is participating in an IACCC training course in the UK as part of our associate membership with the IACCC.
- 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 and it will be removed from future Agendas.
- 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 reviewed by Members and the SIO
- ii. ACC/COMP/2021/009 – the matter was closed.
- iii. ACC/COMP/2021/010 – the matter was closed.
- iv. ACC/COMP/2021/011 – the matter was closed.
- v. ACC/COMP/2021/012 – the ACC is awaiting additional information.
- vi. ACC/COMP/2021/013 – the matter was closed.
- vii. ACC/COMP/2021/015 – the matter was closed.
- viii. ACC/COMP/2021/016 – the matter is closed as it doesn't meet the ACC threshold.
- ix. ACC/COMP/2021/005 – Follow up is needed

b. Existing Corruption Reports/Complaints

The Commission was informed that since inception (1st 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. 132 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. 9 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. It was agreed that persons should be encouraged to complete the Complaints Report Form.

10. Action Items

- a. Member Gus Pope will follow-up regarding the amendments to the Anti-Corruption Act;
- b. The Secretariat will explore options for in-house counsel for a 3 month period;
- 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 5th April 2022.

13. Adjournment

The meeting was adjourned at 2:20pm.

A handwritten signature in black ink, appearing to read 'Sophia Harris', written in a cursive style.

Sophia Harris

CHAIRMAN

ANTI-CORRUPTION COMMISSION