

**MINUTES**  
**6<sup>th</sup> MEETING OF 2022**  
**ANTI-CORRUPTION COMMISSION**  
**5 APRIL 2022**  
**COMMISSIONS SECRETARIAT**

**COMMISSION MEMBERS PRESENT:**

Sophia Harris	Chairman
Kenrick Hall	Member
Kadi Pentney	Member
Adrian Pope	Member
Simon Whicker	Member
Ben Tonner	Member (in part)

**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 9:35am.

**2. Confirmation of Minutes**

The minutes of 24 February 2022 were confirmed subject to agreed changes. Minutes from the four subsequent Extraordinary Meetings would be submitted for review.

**3. Conflicts of Interest**

Ben Tonner recused himself from any discussion on complaints 2015/08; 2012/010; and 2022/003. It was noted that there were no other 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 will follow up.

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

Members agreed that the Secretariat should seek to retain legal advice on a short term basis to undertake this project. Members will provide the Secretariat with suggested names of persons who might have this expertise and could be part of a procurement process as well as instructions for the procurement process.

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

The Secretariat will follow up 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 however has not yet been tabled in the Parliament. The Secretariat will follow up.

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

The conflicts of interest process/policy will be added to a new 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 now has 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 the administrative resources needed to support the commission which currently has investigators but no dedicated administrative support staff. This is more challenging now as the two core Secretariat administrative staff are on maternity leave for 6 months each.

**j. Resource page**

Members discussed additional information to be added to a Resource folder.

**k. ACC staff training**

The ACC Analyst attended training in the UK through the ACC's associate membership relationship with the IACCC, and the ACC Trainee Investigator successfully completed the RCIPS Recruit Training at a very high level.

**l. ACC Presentations**

The ACC was asked to present on trends in Bribery and Corruption for the School of International Financial Services and to also provide a broad overview of the ACC to a group of visiting professionals from Sarajevo. Both presentations are slated for May.

**5. New Business**

**a. Press Relations**

Members discussed communication with the press on any report/complaint and agreed to provide a written policy on the ACC website.

**b. Meeting with New Ombudsman**

Members would like to meet the new Ombudsman at a future meeting

**c. ACC Website Pages**

The ACC website's pages need to be reviewed and updated.

**d. Chairman Meeting with His Excellency The Governor**

The Chairman continues to have regular meetings with His Excellency, The Governor.

**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. Operational Update**

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

There were two new reports/complaints to be considered as follows:

- i. ACC/COMP/2022/001 – to be discussed at the next meeting
- ii. ACC/COMP/2022/002 – to be discussed at the next meeting

**b. Existing Corruption Reports/Complaints**

The Commission was informed that since inception (1<sup>st</sup> Jan. 2010) there have been 156 investigations registered by the Commission, of which:

- iii. 3 are 'pending' awaiting further or sufficient information which may make it appropriate to make further investigations;
- iv. 133 have been concluded (or have not met the threshold or fallen under the remit of the Commission);
- v. 10 have been transferred to other investigative units for action;
- vi. 10 are now under current active investigation; and
- vii. 0 is being assessed/considered.

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

**8. Any Other Business**

There was no other business.

**9. Action Items**

- a. Members and the Secretariat will continue to follow up on any action points;
- b. The Secretariat will draft correspondence in relation to any reports/complaints; and
- c. The Secretariat will continue to provide the necessary statistics for the CFATF and NRA reporting as required.

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

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

**11. Next Meeting**

The date of the next meeting was agreed for Wednesday 18<sup>th</sup> May 2022 and a subsequent meeting will be held on Wednesday 10<sup>th</sup> August 2022.

**12. Adjournment**

The meeting was adjourned at 12:45pm.



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**Sophia Harris**

**CHAIRMAN**

**ANTI-CORRUPTION COMMISSION**