

MINUTES
5th MEETING OF 2025
ANTI-CORRUPTION COMMISSION
8 December 2025
COMMISSIONS SECRETARIAT

COMMISSION MEMBERS PRESENT:

Elisabeth Lees	Member (Acting Chair)
Romeo Frederick	Member
Laurence Aiolfi	Member
Simon Whicker	Member
Dara Flowers Burke	Member

SECRETARIAT MEMBERS PRESENT:

Melanie McField	Manager
Richard Oliver	Senior Investigator ("SIO")
Evette Burnell	Administrator/ Analyst

APOLOGIES:

Kendra Foster	Member
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1. Meeting called to Order

The meeting was called to order at 12.33 pm and new Member Dara Flowers Burke was welcomed to the Commission.

In the absence of a formal Chairman, Members discussed the policy received from the AG concerning the ACC Chairmanship and the AMLSG conflict. They also considered the AG's advice that the Committee remains fully constituted even without a formal Chairman. After consulting the relevant legislation, Members agreed that it was important not to delay the ACC work further and that they would accept this interpretation particularly on the basis that a Chair would soon be appointed, and proceeded with the meeting, with Member Lees acting as Chair for the session.

Once a new Chairman is formally appointed, Members will revisit the policy to determine any potential impact on Memberships and to clarify, if Members remain who are subject to the policy exclusion, who has authority to decide what information from AMLSG meetings can be shared, and with whom.

2. Conflicts of Interest

Members were reminded of their obligation to disclose and recuse themselves should any conflict of interest arise in relation to any new matters during the course of the meeting.

3. Confirmation of Minutes

It was noted that the minutes of the meeting held on 18 June 2025 had previously been approved and posted on the Anti-Corruption Commission (ACC) website.

4. Matters Arising from Previous Meetings

a. Secretariat HR Update

The Manager informed Members that two applicants have been appointed to the Investigator Level I vacancies, and one applicant has been appointed to the Investigator Level II vacancy. The positions of Senior Investigator Officer and the remaining Level II post have been re-advertised, with the application deadline being today.

b. Secure Data/Information Transfer Update

Since iPads were introduced for Members' communication, consistent system access has not been achievable due to password and login issues requiring lengthy CSD support. It has therefore been agreed that Members will return their iPads at the next meeting and revert to usual correspondence methods, using paper folders only for sensitive information.

c. Educational Outreach

Members were informed that, following its circulation and approval by Members, the introductory video outlining the Commission's role and functions was finalized and made available on the Commission's website and will be integrated into the orientation program for new civil servants.

The SIO also updated Members that he presented for the Cayman Islands Institute of Professional Accountants (CIIPA) at a recent event and it is anticipated that he will be presenting for the Compliance Association in February. This will help raise awareness of corruption and signs to watch out for.

d. Jakarta Principles / Independence

Members had previously reviewed the document prepared by Members Whicker and Lees on the Cayman Island's adherence to the Jakarta Principles. Members had agreed elements which fall solely within the remit of the ACC and those that are outside of the ACC's control should be identified before the document is shared with the Governor, the Attorney General (AG) and the Premier.

A covering letter and table was included in the correspondence to clarify this, distinguishing between matters within the ACC's control—along with the proposed approach—and those outside its control that may require legislative amendments.

Members asked that the Secretariat follow up on the correspondence, which was sent to the Governor and copied to the AG and the Premier on 11 July 2025.

e. Annual Report (Reporting Period)

The Secretariat informed Members that they had received correspondence from the AG requesting that future annual reports follow the new financial year (January–December) in accordance with s.53 of the ACT. This creates a conflict with s.9 of the Act, which requires the Governor to receive the annual report on or before September 30. Members noted that, since s.53 allows the report to be issued within six months of the end of the financial year, the report could be submitted in June for the previous year, thereby complying with both s.53 and s.9. This approach will be finalized and confirmed once a new Chairman has been appointed.

5. New Business

None

6. C-FATF Related Updates

The SIO gave an update to Members and advised that the preliminary reports have been drafted for the national risk assessment, which will inform the Cayman Islands response in the next evaluation in 2027.

7. Operational Update

a. Outstanding Matters

i. ACC/COMP/2023/05

No further action for the ACC required. The case will be closed.

b. New Complaints

i. ACC/COMP/2025/04

Members discussed this complaint and decided that a follow up for further information is required.

ii. ACC/COMP/2025/05

Members discussed this complaint and decided that it fell outside of the ACC remit and will therefore be closed.

iii. ACC/COMP/2025/06

Members discussed the complaint and decided to refer it to the Auditor General for review. It will be deferred awaiting the outcome of the review.

iv. ACC/COMP/2025/07

The SIO will speak with a potential witness to gather further information for Members review at the next meeting.

v. ACC/COMP/2025/10

Members deferred the complaint, awaiting the outcome of a partner agency's review.

c. SIO Report

The SIO updated Members regarding ongoing investigations.

d. Existing Corruption Reports/Complaints Statistics

The ACC reported that, since its inception on 1 January 2010, the following statistics have been recorded:

- 164 investigations registered
- 0 investigations pending
- 141 investigations concluded
- 10 investigations transferred to other investigative units
- 13 active investigations

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

8. Any Other Business

The SIO informed Members that they have a new contact in the DPP as their "dedicated Crown Counsel" for ACC matters.

9. Action Items

- a. Management to continue to finalise the recruitment process for the various investigative roles and provide an update in the next meeting, as noted in item 4.a above (Management).
- b. Members are to return their iPads to the Secretariat, as noted in item 4.b above (Members).
- c. The Secretariat is to follow up on the Jakarta Principles documentation sent to the Governor, as noted in item 4.d above (Secretariat).
- d. The Secretariat will draft relevant closure letters, as noted in item 7.a.i and 7.b.ii. above.

10. Items to be Discussed at the Next Meeting

- a. Updates on the action items above
- b. Secretariat HR Update
- c. Educational Outreach
- d. C-FATF Related Updates
- e. Jakarta Principles / Independence
- f. ACC/COMP/2025/04
- g. ACC/COMP/2025/06
- h. ACC/COMP/2025/07
- i. ACC/COMP/2025/10

11. Date of the Next Meeting

The next meeting date will be decided by round robin.

12. Adjournment

The meeting was adjourned at 2:40 PM.



Elisabeth Lees
Acting Chairman
ANTI-CORRUPTION COMMISSION