



INTEGRITY COMMISSION

ANNUAL REPORT

2022-2023

UNITED AGAINST CORRUPTION

INTEGRITY COMMISSION



INTEGRITY COMMISSION

OFFICE OF THE EXECUTIVE DIRECTOR

3rd to 6th Floors, Sagacor-Sigma Building, 63-67 Knutsford Boulevard
Kingston 5, Jamaica W.I.
Tel: (876)-929-6460, (876)-929-8560, (876)-929-6466
Fax: (876)-929-7335
Website: www.integrity.gov.jm

June 29, 2023

The Hon. Marisa Dalrymple-Philibert, CD, MP
Speaker of the House of Representatives
Houses of Parliament
Gordon House
81 Duke Street
Kingston

Senator the Hon. Tom Tavares-Finson, OJ, CD, KC, JP
President of the Senate
Houses of Parliament
Gordon House
81 Duke Street
Kingston

Dear Honourable Speaker and Honourable President:

Section 36(2) of the Integrity Commission Act directs as follows:

“The Commission shall, not later than three months after the end of each financial year, or within such longer period as the Parliament may approve, submit to Parliament an annual report relating generally to the execution of the functions of the Commission during the preceding financial year, which shall contain the information set out in the Second Schedule.”

In keeping with this provision, I now hereby submit to you three (3) printed copies and an electronic copy of the Fifth Annual Report for the Integrity Commission for the financial year 2022/2023.

Yours Respectfully,

Mr. Justice (Ret'd) Seymour Pantan, OJ, CD
Chairman

Copy: Ms. Valrie Curtis, CD, BH(M), JP, Clerk to the Houses of Parliament

INTEGRITY COMMISSION

Table of Contents

Chapter 1 - Messages.....	1
Chairman's Remarks	2
Executive Director's Remarks.....	4
Chapter 2 – Executive Summary.....	9
Chapter 3 - Governance Structure	13
Chapter 4- Statutory Requirements for Content of the Annual Report	19
Chapter 5 - Information and Complaints Division	21
Chapter 6 - Investigation Division.....	41
Chapter 7 - Corruption Prosecution Division	79
Chapter 8 - Corruption Prevention, Stakeholder Engagement & Anti-Corruption Strategy Division.....	85
Chapter 9 - Legal Department.....	97
Chapter 10 - Information Technology and Business Processes Division	103
Chapter 11 - Corporate Services Division	111
Chapter 12 - Finance and Accounts Division	125
Chapter 13 - Recommendations for Legislative Amendments and Best Practices	131
Chapter 14 - Audited Financial Statements.....	137
Chapter 15 – Appendices.....	169
Appendix 1:- Days Taken to Complete the Investigation of Complaints & Referrals.....	170
Appendix 2: - Areas of Impact – Contract Monitoring	174
Appendix 3: - Areas of Impact – Licences and Asset Divestment/ Acquisition	185
Appendix 4 - Reports tabled in the Houses of Parliament over the Period	197
Appendix 5 – Organisation Chart.....	199

Chapter 1 - Messages

Chairman's Remarks

Jamaica's Integrity Commission is a Commission of Parliament established by the Integrity Commission Act 2017. It came into being in February 2018. The Commission's primary role is to **promote and strengthen measures for the prevention, detection, investigation and prosecution of acts of corruption**. The law defines an act of corruption as any breach of the Corruption Prevention Act or any offence relating to the conduct of a person who misuses his office so as to confer a benefit or an advantage to himself or another person.

The law gives certain powers to the Commissioners, Executive Director, and Directors of the Commission. In the year under review, I am satisfied that no one connected to the Commission has violated any of the provisions of law in the execution of the duties assigned.

I wish to take this opportunity to thank the Commissioners, Executive Director, Directors and Staff of the Commission for the commendable manner in which they have performed their duties. I urge everyone to continue to calmly, quietly, and impartially attend to their respective tasks. Do not be daunted or distracted. It is human to err. However, be as careful as you humanly can. If errors are made, and I hope there will be none, correct them at the earliest opportunity.

This report shows that the Commission has been doing exactly what the law requires – **educating public officials, detecting wrongdoing, investigating complaints, prosecuting offenders and making reports to Parliament**. Being a new organization, the Commission was, for a good while, hampered by staffing and space issues. Not to mention Covid-19. Thankfully, things have settled down somewhat and the Commission is now almost fully functional.

As a Commission of Parliament, one would have expected that Parliament as a whole would be working with the Commission in a co-operative way with a view to lessening, if not eradicating, corruption in Jamaica. However, much of what has been happening in Parliament in recent times indicates that there is a concerted attack by some parliamentarians on the institution. It is as if there is a desire by them for the institution to be dismantled or at least frozen by fear.

The Commission has made submissions for improvement to the legislation but those submissions and suggestions have not been addressed. Instead, it seems that at the top of the parliamentary committee's agenda is the removal of a key member of the Commission – the Auditor-General. This is surprising to me, the other Commissioners, the Staff of the Commission and to members of the public who are concerned about the general perception of corruption in our beautiful country. I am stating emphatically again for the record, and for posterity, that I am against this proposal as it will only weaken the Commission. The Auditor-General has been a fixture on the bodies set up to monitor the behaviour of public officials in their public roles. That has been the position for approximately fifty years. I am not aware of anything that has happened since 2017 to warrant the removal of the Auditor-General. In fact, from what I have seen, there is clear reason for the Auditor-General to be on the Commission.

Quite apart from the committee's "top of the agenda" item, I have noted the abusive, disrespectful, libelous language used by some parliamentarians in launching personal attacks under the cover of parliamentary privilege against persons connected to the Commission. Right-thinking Jamaicans here and abroad have expressed to me and other Commissioners how appalled they have been by the behaviour of these parliamentarians. Some have even taken the vitriol unto party political platforms. This is a great pity. I am sure that the foreigners in our midst are taking note of these developments. I am seeing true characters coming to the fore from some of the presentations and what I see does not look good.

INTEGRITY COMMISSION

The Commission is merely carrying out its mandate under the law. The Commissioners, in particular, are individuals who do not need to blow their own trumpet. We are persons who have good records locally and internationally, through dedicated, hard, honest, sincere work. None of us needs the Commission to burnish our image. We are persons who love our country, Jamaica, and wish to see this cloud of corruption removed. We were appointed by the Governor-General on the basis of our personal record. We do not wear party political garb, and reject any assertion of partisanship. We wish for the World to see Jamaica in a brighter light, and hope that parliamentarians, in particular, will cooperate with the Commission, instead of trying to tear it down. I urge parliamentarians to stop the nit-picking and the use of derogatory language.

The Executive Director and Directors were also appointed by the Governor-General on the recommendation of the Commission after an independent selection process conducted by an independent agency. So, it is malicious for anyone to say that party political affiliation played a part in the appointment of anyone.

The Commission recognizes the need to educate public officials and the public at large on the ethical values that ought to be practised. Consequently, a Division of the Commission has been created to do just that. It is headed by a Director who along with his staff has been making the rounds to public and private offices. Seminars are being held on a regular basis. Hopefully, the message will eventually hit home that corruption is not something to be tolerated.

It is important to note that the law instructs that investigations started before the establishment of the Commission are to be completed by the Commission. That accounts for the fact that some reports to Parliament are from an earlier time. The investigations were started before the Commission came into existence. The law also gives the Commission, through the relevant Directors, the authority to make inquiries considered necessary to verify statutory declarations as to income, assets and liabilities. In doing verifications, it will be necessary in some cases to get information from an earlier time. It should also be noted that the Director of Corruption Prosecution is subject to no one in the exercise of her prosecutorial role. There is no one at the Commission who is pressuring anyone to do anything not authorized by law. To state otherwise is mischievous.

In closing, I urge everyone to read the reports that are submitted to Parliament for tabling. Do not just concentrate on the recommendations made or the form of the reports. Read the body of the reports to see what was complained of, and what was found after investigation. There are some persons who seem to be only interested in the conclusions rather than the activities that gave rise to the conclusions.

Prior to the establishment of this Commission, many public officials routinely ignored or breached the various pieces of integrity legislation. Those days are over. It is no longer business as usual.

Hon. Seymour Panton, OJ, CD
Chairman

Executive Director's Remarks

The 2022/2023 Financial Year (FY), which is the focus of this Annual Report, was a pivotal year for the Integrity Commission (IC). It was the year in which the Commission became five (5) years old, having been operationalized in February 2018.

Lead Strategic Project Completed

Fortuitously, it was also during this FY that one of the Commission's most important strategic projects, a project that was commenced in earnest just over 3 years ago, was completed.

The project involved the diligent search, via an open process, to identify, then to lease and build-out, at competitive rates, some 25,000 sq. ft. of new and expanded office space, to house the Commission's now approved staff complement of 177.

The chosen building was the Sagikor-SIGMA Building in New Kingston, and I am happy to report that, as at the end of March 2023, the Commission had transitioned all of its Divisions, excepting one, into four (4) floors of new offices on the building. The Commission's Investigation Division will continue to be housed on the 1st Floor of the PIOJ Building on Oxford Road, New Kingston.

Commission Performed Relatively Good Despite Staffing Under-Capacity

With its new acquisition, the Commission, which ended the year at 64% of its approved staff capacity, is now positioned to hire all 177 of its full staff complement, and to progressively attain maximum efficiency and effectiveness in the delivery of its statutory mandates. Indeed, an aggressive human resource recruitment drive is already well underway.

But despite having to function so far at a significantly reduced staffing capacity, the Commission's staff-members have, nevertheless, throughout the year, acquitted themselves relatively well in the performance of their duties. This will become evident as you go through the Report, as I hope you will.

I, therefore, wish to convey my deep gratitude to them, and to our seven (7) Divisional Directors for their leadership. We have faced many challenges during the year, but we have prevailed.

I must also register my appreciation to our esteemed Board of Commissioners. The IC organization, as it continues to evolve, has benefitted significantly from the Board's wise counsel, guidance and overarching good stewardship.

Oath of Office and Serving the Public Interest

Sections 3 and 6 of the Integrity Commission Act (ICA) set forth, respectively, the four (4) Objects and sixteen (16) Functions of the Commission. Underlying the Commission's statutory mandates is Schedule 1 of the Act, which contains the Oath of Office. Section 57 of the ICA expressly provides that subscription to this Oath is a prerequisite for being lawfully employed to the IC.

The ICA has six (6) Schedules. It is, therefore, fair to assume that the Oath of Office, having been pre-eminently placed in the 1st Schedule to the Act, means something. We, therefore, take it very seriously.

INTEGRITY COMMISSION

Among other things, the Oath, which is the common thread that binds the IC Family together, requires each staff member to “faithfully perform any functions assigned” and, implicitly, to do so solely in the public interest.

I am satisfied that our staff-members stood true to their commitment during the year. Indeed, they might have done so too well given the discomfort that has arisen in some quarters about the Commission, and the seeming ill-intended and malicious attacks that have been directed against it and its Officers by some.

But this is par for the course. It signals that you’re doing your job, for it is not the business of anti-corruption officers to seek to win the favor of those in respect of whom they are required to discharge their mandate, nor that of their supporters.

Their sole duty is to be servants of the public interest and to be even-handed, fearless and dispassionate in what they do. They must follow the facts, and the law, irrespective of wherever or to whomever they may take them.

Recommendations Made to Parliament for Review of the Integrity Commission Act

The reporting year also saw the establishment, as well as several sittings, of a Joint Select Committee of Parliament to review the ICA (the ICA-JSC). The 5-year review, that is currently underway, is required by Section 60(2) of the ICA. The Commission was grateful for the opportunity to appear before the ICA-JSC on two occasions, during which it presented eighteen (18) considered recommendations for amendment to the ICA and other associated laws.

Eight (8) other groups, including Civil Society groups, also made formal public presentations before the ICA-JSC. Additionally, one (1) Government Parliamentarian, who sits on the ICA-JSC, was also allowed to make a lengthy presentation in which he proposed several controversial measures to amend the ICA. If accepted, they will substantially curtail the functional effectiveness of the IC.

The Commission hopes that the Parliament will find good favor with its recommendations, many of which are supported by Civil Society. It, therefore, continues to anxiously await the Parliament’s response.

Lack of Meetings of the Integrity Commission Parliament Oversight Committee

In the IC’s last Annual Report, for FY 2021/2022, I bemoaned the fact that a critical Parliamentary Bi-Partisan Committee, that was established under the ICA as the IC Parliament Oversight Committee, had met only twice in that year.

Unfortunately, however, the Committee did worse in this past year. It had just a single meeting which, incidentally, was hurriedly convened, on March 29, 2023, to consider a controversial Investigation Report that was tabled in the House of Representatives on February 14, 2023.

Now, the primary ‘duty’ of the IC Parliament Oversight Committee, as is stated in the 5th Schedule of the ICA, is “monitoring and reviewing the performance of the functions of the IC.” The IC is, therefore, concerned that, in the absence of regular meetings of this vital Committee, its work will not be showcased for transparency, public scrutiny or public education.

The Commission has accomplished relatively good work and has a compelling story to tell. It, therefore, welcomes the opportunity to appear before this Committee. Three (3) meetings with the IC in two (2) years could not have been what the Parliament had intended for this ‘Oversight Committee.’

Knowledge of Integrity Commission Act and IC Governance Structures

It has become apparent in the recent past that there are officials who should be conversant with the law that established the ICA, but, surprisingly, are not. Some lawmakers, it appears, were also not aware of the corporate governance structures of the IC, the different statutory roles of its primary functionaries, or how they are separated and made independent of each other, under the law.

Regrettably, this has led to uninformed and misguided statements being made in the public domain about the IC. In turn, they have served to sow seeds of discord and encourage adverse public sentiment against the Commission, and its officials. Hopefully, more care will be taken in the future concerning such matters.

Conflict of Interest Concern - Parliamentarians Who May be Under Investigation

There is a *'what if'* concern, regarding the potential for a conflict of interest, which needs to be openly discussed in the public interest. It concerns the question as to what should happen *if* a Parliamentarian who sits on the ICA-JSC, or the IC Parliament Oversight Committee, should become the subject of an IC Investigation.

He/she would know, and the IC would know, but the public would not know, about the ongoing investigation, unless the Official makes a voluntary public disclosure about it, and recuses himself/herself from the deliberations of the Committee. The IC is, of course, gagged by Section 53(3) of the ICA, from disclosing who it is investigating, so this will compound the problem.

Jamaica's 2022 Corruption Perception Index (CPI) Rankings

Unfortunately, for another year, Jamaica's performance on Transparency International's (TI's) Global Corruption Perception Index (CPI), was poor. There was no improvement.

In TI's 2022 CPI, which was announced on January 31, 2023, Jamaica's 2021 CPI score of 44 out of 100, where 0 means 'Highly Corrupt', and 100 'Very Clean', remained unchanged for 2022.

In the 21 years that TI has been ranking Jamaica, the country has averaged a CPI score of only 38 out of 100. Prior to attaining its highest ever CPI score of 44 in 2017 – the year in which the ICA was passed into law – Jamaica had never scored higher than 41 - its CPI score in 2015. Jamaica's lowest CPI score ever was 30. This was recorded in 2009.

Again, it should be made clear that a CPI score of below 50 means that a country has a grave corruption problem. A poor CPI score, according to TI, signals prevalent bribery, lack of punishment for corruption, and public institutions that do not respond to citizens' needs.

Without question, an effective fight against corruption can only begin with a country's executive and parliamentary leaders. They are uniquely placed to set the right tone, both in word and in deed, and for others to follow.

Further, only they can ensure that strong laws are in place, that are consistent with international best practices, which will provide national anti-corruption institutions with an effective legislative framework, and the tools that they will require, to seriously combat the scourge of corruption.

Fortunately, Jamaica is presently at a juncture at which it is reviewing its primary anti-corruption law. Hopefully, therefore, we will, as a country, seize the opportunity to set things right.

INTEGRITY COMMISSION

Closing Remark

In closing, it would be remiss of me if I did not publicly express my and the Commission's appreciation to all those who, in one way or the other, have conveyed prayers and good wishes for the Commission and its Officers, and their work.

We are grateful to all of you, as well to all right-thinking Jamaicans, who understand the value and role of a strong and independent national anti-corruption institution in building a better Jamaica.

Greg Christie
Executive Director

INTEGRITY COMMISSION

Chapter 2 – Executive Summary

EXECUTIVE SUMMARY

The financial year, ending March 2023, can be described as a moderately good year with its fair share of challenges, when compared to the last two fiscal years, vis-à-vis, the impacts of the covid-19 pandemic, and related operational challenges which significantly affected the Integrity Commission's (the Commission) performances across all business activities. During the 2022/2023 period, the Commission resumed near back-to-normal anti-corruption and operational activities, and also took occupancy of its new offices located on the Sagicor Sigma building in New Kingston, having completed the infrastructure and networking buildout of the facility.

CORPORATE GOVERNANCE

Pursuant to Section 5(4) of the Integrity Commission Act, 2017, the Commission is headed by duly appointed Commissioners who are responsible for the governance and oversight of the organisation.

In the performance of its functions under Section 25 of the Act, the Commission, during the reporting period, convened 11 Board of Commissions meetings, 12 Audit, Finance and Technology Committee meetings, 9 Corruption Prevention Committee meetings, 8 Human Resource and Corporate Governance meetings, 18 Information and Complaints Committee meetings, and 11 Investigations and Corruption Prosecutions meetings.

At the executive level, a total of 23 Leadership Meetings were convened during the reporting period.

ANTI-CORRUPTION ACTIVITIES

Statutory Declarations: At the end of the reporting period, March 31st, 2023, the Commission recorded a 71% compliance rate for public officials and a 92% compliance rate for Parliamentarians, with respect to the requirement to file a Statutory Declaration. During the reporting period, the Commission examined 563 Statutory Declarations, using a risk-based approach and stratified random sampling, and certified 439 of those Statutory Declarations. 32 public officials and 7 Parliamentarians were referred for investigation.

Complaints and Information: For the period under review, 158 complaints and information were received by the Commission, of which 59 matters were referred to the Director of Investigation, 58 were closed, and 18 matters are being kept-in-view.

Protected Disclosures: During the reporting period, 149 or 81% of the 185 Public Bodies that were required to submit a draft Protected Disclosures Procedural Guidelines (PDPG), submitted same. The Commission approved 109 of the PDPGs received.

Additionally, the Commission engaged a total of 66 senior management teams of Public Bodies, and conducted 25 Sensitisation sessions with the general staff members of Public Sector Bodies. A Public Relations Campaign was initiated in March 2023, and 3 Billboards were strategically placed in Half way Tree, on Washington Boulevard and in Sam Sharpe Square, Montego Bay. Under this Initiative, other public education programmes will be launched to raise awareness of the Protected Disclosures Act, 2011. The proposed training of Designated Officers within the Public Sector is scheduled to commence in April 2023.

Electronic Declaration System (eDS): The time taken to approve the Legislative Framework remained an obstacle to fully implement the eDS. Notwithstanding, on April 28, 2023, the Permanent Secretary of the Office of the Prime Minister wrote to the Commission advising that the Cabinet gave approval for the promulgation of Regulations,

INTEGRITY COMMISSION

pursuant to Section 64 of the Integrity Commission Act and Section 14 of the Electronic Transaction Act, to provide for the use of [Statutory Declaration] electronic forms.

Declarations and Financial Investigations and Contract, Procurement & Corruption Investigations: Since the inception of the Integrity Commission, the Investigation Division received 1303 complaints/referrals. Of this number, 1082 or 83% were completed. During the 2022/2023 financial year, 112 cases were received. For the same period, 147 cases were disposed of, which include cases received for previous years/period. In addition, the average turn-around time of cases was approximately 387 days. Note, with a decrease in case referral/complaints for the period under review, and the significant reduction in backlog cases, the case to investigator ratio has been reduced from 19 cases per investigator to 10 cases per investigator. Notwithstanding the foregoing, the Investigation Division continues to grapple with having only 54% of its staff at the end of the financial year.

Contract Monitoring: A total of 662 construction contracts with a cumulative value of J\$91,685,639,059.92 and US\$620,158,440.59 were monitored during the reporting period. During the same period, the Construction Inspectors made a total of 272 site visits, and attended 113 site meetings, and were involved in the monitoring of 9) Practical Completion Inspections. At the end of the reporting period, the Inspectors travelled a total of 90,689 kilometres for the purpose of discharging their monitoring duties island-wide. The compliance rate for the Quarterly Contracts Award Report (QCAR) for the current financial year was 100% while that for the Annual Contracts Cost Overruns and Variations Report (ACCOVR) was 81%. This represents increases of 3.5 and 57 percentage points respectively.

A new monitoring initiative, aimed at gathering information from specific Public Bodies regarding the use of Single Source and Restricted Bidding Methodologies (non-competitive/lesser competitive methodologies), was implemented by the Unit during the reporting period. Twenty six (26) public bodies were included in the pilot and these public bodies were asked to provide the Director of Investigation with information on their procurement plans for the Financial Year 2023/2024. The aim of this initiative was to provide greater oversight in our monitoring activities by paying specific attention to non-competitive procurement methodologies.

Licencing Asset Divestment/Acquisition (LADA): In an effort to bolster our corruption prevention efforts, the LADA Unit implemented several initiatives including the launch of an online platform for the reporting of Prescribed licences issued by Public Bodies, the monitoring of Public Private Partnership arrangements, and the development an online database for the reporting of asset divestments/acquisitions. The Unit also monitored a total of 388 projects inclusive of 46 new projects for the period 2022-2023 and reviewed 456 submissions considered by several external Committees.

Corruption Prosecution: For the reporting period, a total of sixty-eight (68) Financial Investigation matters were referred for prosecution. Of the 68 matters received during the period, prosecution was recommended for 25 Declarants, while the remaining 43 referrals were under review at the close of the period. Prosecution was initiated and concluded in 1 of the 25 matters ruled for prosecution, with conviction recorded. Summonses were issued in the remaining 24 matters which are scheduled for Court in the first quarter of the coming period.

Corruption Prevention, Stakeholder Engagement and Anti-Corruption Strategy: During fiscal year 2022/2023, an estimated 2,700 individuals were exposed to the work of the Integrity Commission by virtue of either presentations or training interventions delivered by the Division under its *Anti-Corruption and Good Governance Workshops* and/or via presentations at conferences/retreats and other events and through its various stakeholder engagement sessions.

In accordance with Section 6 (1) (j) of the Integrity Commission Act, 2017, the Commission commenced in-house activities in relation to the coordination and development of a National Anti-Corruption Strategy for Jamaica with the

INTEGRITY COMMISSION

empanelling of Technical Working Groups tasked with, *inter alia*, fleshing out strategies to inform the National Anti-Corruption Strategy and proposing recommendations to address issues identified.

OPERATIONAL ACTIVITIES

The fiscal year began with a staffing complement of 114 employees. During the reported period, the Commission's organizational structure was increased from 172 to 177 posts.

At the end of the 2022-2023 fiscal year, the Commission ended the year with 123 employees, had a staffing capacity of 64%, whilst recording an employee retention rate of 91%. This contributed to a stable workforce to take on the mandate and functions of the organization.

During the 2022-2023 period, the organization continued its Training & Development Programme to build the capacity and competency of its employees. At the end of the reporting period, 253 participants completed 38 Training Programmes, costing approximately \$9.3M.

The Commission continued ardent efforts during the reporting period in finalizing the completion of the three (3) remaining floors (3rd, 5th & 6th floors) at the Sagicor Sigma Building in New Kingston.

The relocation of the remaining divisions, save for the Investigation Division, from the Oxford Road Office to the Sagicor-Sigma Building, was completed in March 2023, freeing up much needed office space at the Oxford Road office location.

The Commission, on gaining full possession of its new offices on the Sagicor-Sigma building, will complete the on-boarding of the remaining portion of its approved staff complement.

FINANCIAL PERFORMANCE

At the start of the 2022-2023 fiscal year, the approved Budget for the Commission was \$1.150 Billion, this included \$35 Million for Statutory Expenditure, and \$126.6 Million from the FCDO Donor Fund.

During the year, the Commission's budgeted allocation was increased, this as it relates to the 4 Supplementary Estimates that were passed to support the GOJ's Public Sector Compensation Review process. The 2022-2023 financial year ended with the Commission receiving a revised budget of J\$1.515 Billion whilst the overall expenditure for the reporting period totaled approximately J\$1.436 Billion, representing a utilization of 80% of the Approved Revised Vote. The remaining amount was surrendered to the Consolidated Fund.

OUTLOOK

The Commission, in the short to medium-term, will be seeking to increase and improve its anti-corruption initiatives. The organization will continue to recruit and onboard competent employees to enhance the execution of the Commission's commitments that are outlined in its strategic objectives and priorities for the upcoming period.

Chapter 3 - Governance Structure

Governance Structure

The Integrity Commission is headed by duly appointed Commissioners who are responsible for the governance and oversight of the Integrity Commission, pursuant to the requirements of the Act.

Section 5(4) of the Integrity Commission Act, 2017, provides as follows:

“The Commission shall –

- (a) subject to sections 34(3) and 36(4), be ultimately responsible and accountable to Parliament for all matters relating to the functions of the Commission[sic]; and*
- (b) monitor and report to Parliament on the operation and effectiveness of the provisions of this Act.”*

Section 8(1) of the Integrity Commission Act, 2017, which is detailed hereunder, provides particulars of the constitution of the Commission and the persons who may be appointed to hold such an appointment, as a Commissioner.

8. - (1) Pursuant to section 5 and subject to subsection (3), the Commission shall consist of the following persons appointed as Commissioners —

- (a) the Auditor-General;*
- (b) four other persons (hereinafter referred to as “appointed Commissioners”) appointed by the Governor-General, by instrument in writing, after consultation with the Prime Minister and the Leader of the Opposition, from any of the following categories of persons—*
 - i. retired Judges of the Court of Appeal or retired Judges of the Supreme Court, from which two persons shall be appointed;*
 - ii. senior retired public officials with knowledge and expertise in the area of finance, accounting or public administration;*
 - iii. persons who represent non-governmental organizations that appear to be well established*

In this regard, the Commission is currently comprised of the following members:

1. The Hon. Mr. Justice (Ret'd) Seymour Panton, OJ, CD (Chairman)
2. Mrs. Pamela Monroe Ellis, FCCA, CA
3. The Hon. Mr. Justice (Ret'd) Lloyd Hibbert, CD., Q.C.
4. Mr. Eric Crawford, CD, FCA, FCCA
5. Mr. H. Wayne Powell, O.D., J.P.

In the performance of its functions under the Act, the Commission, pursuant to Section 25 of the Act, has established several Committees through which oversight is provided. Detailed, below, are particulars of each Committee, inclusive of their membership and the number of meetings convened.

INTEGRITY COMMISSION

INTEGRITY COMMISSION COMMITTEES AND MEMBERS

COMMISSION MEETINGS

Standing Members:

The Hon. Mr. Justice (Ret'd) Seymour Panton, OJ, CD (Chairman)
The Hon. Mr. Justice (Ret'd) Lloyd Hibbert, CD (Commissioner)
Mrs. Pamela Monroe-Ellis, FCCA, CA (Commissioner)
Mr. Eric Crawford, CD (Commissioner)
Mr. H. Wayne Powell, OD, JP (Commissioner)

Executive Director

Meeting Schedule	The 1 st Monday of every month or as required.
-------------------------	---

No. of Meetings convened for the Reporting Period	11
--	----

AUDIT, FINANCE & TECHNOLOGY COMMITTEE

Standing Members:

Mr. Eric Crawford, CD (Committee Chair)
Mrs. Pamela Monroe-Ellis, FCCA, CA
Mr. H. Wayne Powell, OD, JP

Executive Director
Director of Finance & Accounts
Director of Information Technology & Business Processes
Director of Corporate Services
Chief Audit Executive

Meeting Schedule	The 3 rd Thursday of every month or as required (April -May 2022)
-------------------------	--

	The 3 rd Tuesday of every month or as required (June 2022- present)
--	--

No. of Meetings convened for the Reporting Period	12
--	----

INTEGRITY COMMISSION

CORRUPTION PREVENTION, STAKEHOLDER ENGAGEMENT & ANTI-CORRUPTION STRATEGY COMMITTEE

Standing Members:

The Hon. Mr. Justice (Ret'd) Seymour Panton, OJ, CD (Committee Chair)
The Hon. Mr. Justice (Ret'd) Lloyd Hibbert, CD
Mr. H. Wayne Powell, OD, JP
Mr. Greg Christie, Executive Director

Director of Corruption Prevention, Stakeholder Engagement & Anti-corruption Strategy

Meeting Schedule	The 3 rd Monday of every other month or as required (April – July 2022)
-------------------------	--

	The 3 rd Monday of every month or as required (September 2022 – present)
--	---

No. of Meetings convened for the Reporting Period	9
--	---

HUMAN RESOURCE & CORPORATE GOVERNANCE COMMITTEE

Standing Members:

Mrs. Pamela Monroe-Ellis, FCCA, CA (Committee Chair, Human Resource Component)
Mr. H. Wayne Powell, OD, JP (Committee Chair, Corporate Governance Component)
The Hon. Mr. Justice (Ret'd) Lloyd Hibbert, CD

Executive Director
Director of Corporate Services

Meeting Schedule	The 4 th Friday of every month or as required.
-------------------------	---

No. of Meetings convened for the Reporting Period	8
--	---

INTEGRITY COMMISSION

INFORMATION & COMPLAINTS COMMITTEE

Standing Members:

Mrs. Pamela Monroe-Ellis, FCCA, CA (Committee Chair)
The Hon. Mr. Justice (Ret'd) Seymour Panton, OJ, CD
Mr. Eric Crawford, CD

Director of Information & Complaints

Meeting Schedule	The 3 rd Wednesday of every month or as required, and the 4 th Thursday of every month or as required
-------------------------	---

No. of Meetings convened for the Reporting Period	18
--	----

INVESTIGATION & CORRUPTION PROSECUTION COMMITTEE

Standing Members:

The Hon. Mr. Justice (Ret'd) Lloyd Hibbert, CD (Committee Chair)
The Hon. Mr. Justice (Ret'd) Seymour Panton, OJ, CD
Mr. Eric Crawford, CD

Director of Investigation
Director of Corruption Prosecution

Meeting Schedule	The 2 nd Friday of every month or as required.
-------------------------	---

No. of Meetings convened for the Reporting Period	11
--	----

STATUTORY DIRECTORS' / EXECUTIVE DIRECTOR'S LEADERSHIP COMMITTEE

Standing Members:

**Executive Director (Committee Chair)
 Director of Investigation
 Director of Corruption Prosecution
 Director of Information and Complaints
 Director of Corruption Prevention, Stakeholder Engagement & Anti-corruption Strategy**

Meeting Schedule	The 2 nd Wednesday of every month or otherwise as may be determined
No. of Meetings convened for the Reporting Period	12

LEADERSHIP TEAM COMMITTEE

Standing Members:

**Executive Director (Committee Chair)
 Director of Investigation
 Director of Corruption Prosecution
 Director of Information and Complaints
 Director of Corruption Prevention, Stakeholder Engagement & Anti-corruption Strategy
 Director of Corporate Services
 Director of Finance and Accounts
 Director of Information Technology and Business Processes
 Legal Counsel
 Project Manager, Integrity Commission/Sagikor Relocation Project**

Meeting Schedule	The 2 nd Wednesday of every month or otherwise as may be determined
No. of Meetings convened for the Reporting Period	11

VIRTUAL STAFF MEETINGS

**Executive Director (Co-Chair)
 Director of Corporate Services (Co-Chair)**

Meeting Schedule	Quarterly
No. of Meetings convened for the Reporting Period	4

Chapter 4- Statutory Requirements for Content of the Annual Report

INTEGRITY COMMISSION

The Integrity Commission, in the preparation and publication of its Annual Report, is bound by the requirements of the law regarding its content and the information which can be made available in the referenced Report. Specifically, Section 36 (2) of the Integrity Commission Act, 2017, provides as follows:

“The Commission shall, not later than three months after the end of each financial year, or within such longer period as the Parliament may approve, submit to Parliament an annual report relating generally to the execution of the functions of the Commission during the preceding financial year, which shall contain the information set out in the Second Schedule.”

Detailed below is the verbatim content of the Second Schedule of the Integrity Commission Act and to which the substance of the Commission’s Annual Report is aligned.

SECOND SCHEDULE (Section 36(2))

Contents of Annual Report of Commission

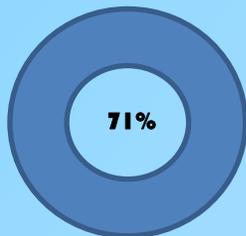
1. *A general description of the matters that were referred to the Commission.*
2. *Subject to section 53(3), a general description of the matters investigated by the Commission.*
3. *The following details with respect to matters investigated by the Commission—*
 - a. the number of investigations commenced but not finally dealt with during the financial year in question;*
 - b. the average time taken to deal with complaints and the actual time taken to investigate any matter in respect of which a report is made.*
4. *Any recommendations for changes in the laws of Jamaica, or for administrative action, that the Commission considers should be made as a result of the exercise of its functions.*
5. *The general nature and extent of any information submitted under this Act by the Commission during the year to the Security Forces or any other public body.*
6. *The number of matters investigated by the Commission which have resulted in prosecutions or disciplinary action in that year.*
7. *A description of its activities during that year in relation to any of its functions.*
8. *The number of convictions and acquittals, and where a charge is laid the time taken to dispose of each matter.*
9. *Such other information as the Commission thinks relevant; however, no details shall be provided by the Commission in relation to any matter under investigation by the Director of Investigation or for which criminal proceedings have been instituted by the Director of Corruption Prosecution.*
10. *The audited financial statements of the Commission for the financial year.*

Chapter 5 - Information and Complaints Division

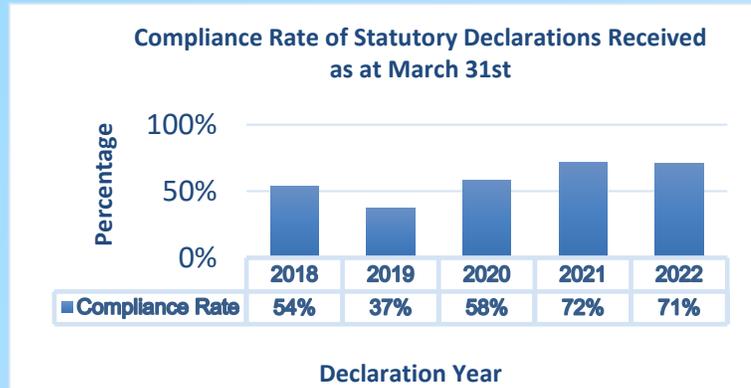
INFORMATION AND COMPLAINTS DIVISION

Statutory Declarations - Compliance

Current Reporting Period
As at March 31, 2023



Five Year Comparison



Statutory Declarations (SDs) - Examination

Current Reporting Period
As at March 31st, 2023



Matrix of Statutory Declaration Outcomes: 2018/2019 – 2022/2023

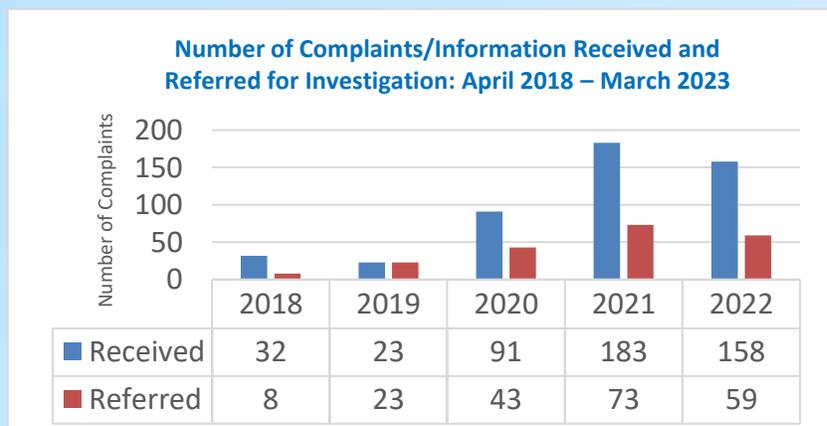
Category	Number of Statutory Declarations Received	Number of Statutory Declarations Examined	Number of Statutory Declarations Certified	Number of Public Officials Referred for Investigation	Examination Work-In-Progress
Parliamentarians	467	196	119	10	52
Councillors	915	66	39	3	17
Senior Public Officials	834	89	68	7	41
Other Public Officials	140,838	705	567	32	383
Total	143,054	1,056	793	52 (263 SDs)	493

Complaints Management

Current Reporting Period
As at March 31st, 2023



Five Year Comparison



INFORMATION AND COMPLAINTS DIVISION

Protected Disclosures

	Number of Public Bodies that submitted Protected Disclosures Procedural Guidelines	Number of Protected Disclosures Received by Public Sector Entities	Number of Protected Disclosures Received by the Integrity Commission
2021/2022	16 (9%)	1	4
2022/2023	149 (81%)	6	7

Human Resource Capacity

Human Resource



86%

[25 Staff Members as at March 31, 2023]

Office of the Director of Information and Complaints	Complaints and Protected Disclosures Unit	Declarations Unit	Financial Analysis Unit
Director of Information and Complaints (1 Filled)	Manager of Complaints and Protected Disclosures (1 Filled)	Manager of Declarations (1 Filled)	Manager of Financial Analysis (1 Filled)
Reporting and Compliance Officer (1 Filled)	Senior Complaints Review Officer (1 Filled)	Senior Declarations Verification Officer (1 Filled)	Senior Financial Analyst (2 Filled)
Administrative Assistant to the Director of Information and Complaints (1 Filled)	Complaints Review Officer (2 Filled) [1 Vacant]	Declaration Verification Officer (4 Filled) [1 Vacant]	Financial Analyst (5 Filled) [1 Vacant]
Administrative Assistant to the Division (1 Filled)	Senior Protected Disclosure Officer (1 Filled)	Registry Officer (1 Filled) – Corporate Services Division	
	Protected Disclosure Officer (2 Filled) [1 Vacant]	Data Entry Project Initiative – Temporary Data Entry Officers (8 Filled) [7 Vacant]	

Functions of the Director of Information and Complaints

Section 32(1) of the Integrity Commission Act, 2017, sets out the functions of the Director of Information and Complaints, who heads the Information and Complaints Division of the Integrity Commission. The referenced section provides that:

“The Director of Information and Complaints shall –

- a) receive, keep on record and examine all statutory declarations filed with the Commission;*
- b) make such enquiries as he considers necessary in order to certify or determine the accuracy of a statutory declaration;*
- c) receive and keep proper record of any complaint or information or notification in relation to any or all of the following matters:*
 - (i) any allegation which involves or may involve an act of corruption;*
 - (ii) any allegation regarding impropriety or irregularity with respect to the award, implementation or termination of a government contract or the grant, issue, suspension or revocation of a prescribed licence;*
 - (iii) any allegation in respect of non-compliance with any of the provisions of the Act;*
- d) refer to the appropriate Director, any complaint or information or notification received under paragraph (c), or any other matter, which he considers appropriate for action;*
- e) submit to the Executive Director, Quarterly reports on the activities of the Division; and*
- f) perform such other functions as may be assigned to him by or under this Act or any other enactment.”*

The Information and Complaints Committee

Pursuant to Section 25 of the Integrity Commission Act, 2017, a Committee of this Division was established. The Committee is comprised of three (3) members of the Commission; Pamela Monroe-Ellis (Chair), Justice (Ret'd) Seymour Panton, Eric Crawford and the Director of Information and Complaints, Craig Beresford.

The Terms of Reference of the Committee are to:

- (a) review complaints regarding allegations of impropriety as well as non-compliance with any provision of the Integrity Commission Act, 2017;
- (b) advise the Commission on matters of concern that it considers of significance and should be referred to the Director of Investigations; and
- (c) review the summary of statutory declarations for the Prime Minister and Leader of the Opposition, for gazette publication approval.

Information and Complaints Committee Meetings

For the period under review, eighteen (18) committee meetings were held, in which important matters were considered and discussed. Some of the matters discussed were:

- a. Certification of Statutory Declarations, Net Worth Statements, and resultant breaches of the Act, as well as potential cases of illicit enrichment for further and necessary action;
- b. Operationalising the Protected Disclosures Act, 2011;
- c. Revision of the income threshold for the filing of statutory declarations, in the context of the Public Sector Compensation Reform Programme;
- d. Implementing the Electronic Declaration System (eDS);
- e. Improving communication with complainants within the context of the Integrity Commission Act, 2017;
- f. Management of the Statutory Declaration process;
- g. Complaints Management; and
- h. Third Party Verifications.

Information and Complaints Division's Objectives

The Director of Information and Complaints continued to pursue the five (5) broad objectives established in the Financial Year 2020/2021 and refined in 2022, with the aim to continue the strengthening of the Division's core functions:

1. Implementation of the Electronic Declarations System (eDS) to allow for ease of submission on the part of Public Officials and to facilitate a more efficient and effective means of examining Statutory Declarations;
2. Targeting the 100% compliance rate with respect to the submission of Statutory Declarations, by using a dual-pronged approach of engagement and enforcement;
3. Implementation of a mechanism which utilises technology to analyse 100% of Statutory Declarations received from Public Officials;
4. Revision of methodologies, approaches, processes and systems to ensure that 100% of the illicit enrichment and false information cases identified are referred; and
5. Establishment of a robust mechanism to report corruption, fully operationalising the Protected Disclosures Act, 2011 and creating an environment where complainants feel free to report allegations of corruption and non-compliance with the provisions of the Integrity Commission Act.

INTEGRITY COMMISSION

Information and Complaints Division Referrals

Referrals are made by the Director of Information and Complaints pursuant to Sections 38 and 43 of the Integrity Commission Act, 2017, and Sections 14 and 15 of the Corruption Prevention Act, 2001.

During the reporting period, the following referrals were made:

Complaints and Protected Disclosures Referred to the Investigation Division for the Financial Year 2022/2023

Allegation	Referrals
Reports on Allegations of Conflict of Interest, Corruption, Fraud, Impropriety, Contracts and Procurement Breaches – Pursuant to Section 38 of the Integrity Commission Act, 2017	37
Matters identified based on the Director of Information and Complaints' Discretion	22
Protected Disclosures Act, 2011	0

Offences under the Integrity Commission Act, 2017 and the Corruption Prevention Act, 2001 for the Financial Year 2022/2023

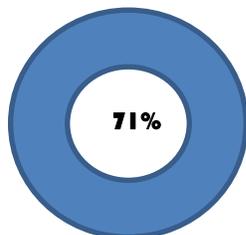
Offences	Parliamentarians	Public Officials
Failure to file a Statutory Declaration - Section 43 (1)(a) of the Integrity Commission, 2017:		
30 Days - Statutory Notice	1	188
Discharge of Liability	-	2
Prosecution	-	7
Failure to provide Information – Section 43 (1)(b) of the Integrity Commission Act, 2017:		
Discharge of Liability	1	7
Prosecution*	1	4
Providing False Information – Section 43(2)(a) of the Integrity Commission Act, 2017 and Section 15(2) (b) of the Corruption Prevention Act, 2001:		
Investigation	7	32
Failure to honour opportunity to Discharge Liability - Section 43(3) of the Integrity Commission Act, 2017:		
Prosecution*	1	2
Illicit Enrichment – Section 14 and 15 of the Corruption Prevention Act, 2001:		
Investigation	6	28
Other Referrals	-	-

Note: Three (3) declarants that were served Discharge of Liability Notices with respect to non-compliance regarding the submission of outstanding statutory declaration(s) or request for information but did not pay the Fixed Penalty Fine of Two Hundred and Fifty Thousand Dollars (\$250,000.00), were referred for prosecution. This, notwithstanding their submission of the outstanding statutory declaration(s) or the requested information."

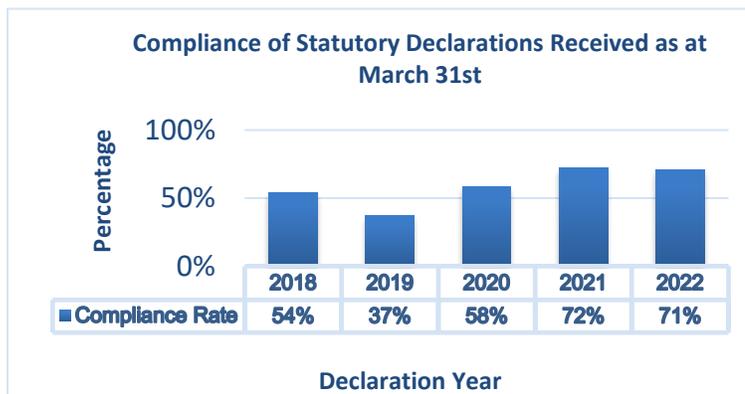
*Although the matters were referred for prosecution, they are first sent to the Investigations Division to undertake certain investigative actions, prior to being forwarded to the Corruption Prosecution Division.

Statutory Declarations - Compliance

Current Reporting Period
As at March 31, 2023



Five Year Comparison



During the reporting period, the Division continued its zero-tolerance programme to improve compliance with the requirement to file a Statutory Declaration. The Table below summarizes the Compliance rates for each declaration period from December 31, 2018 through to December 31, 2022:

Statutory Declaration Period Ended	Number of Declarants required to file Statutory Declarations	Number of Statutory Declarations received as at the relevant declaration deadline March 31 st , each year	Compliance Rate
December 31, 2018	35,000	13,847	54%
December 31, 2019	39,919	13,498	37%
December 31, 2020	40,449	23,532	58%
December 31, 2021	40,347	29,207	72%
December 31, 2022	44,348 ¹	31,535 ²	71%

The Integrity Commission received two thousand, three hundred and twenty-eight (2,328) more Statutory Declarations as at March 31, 2023, when compared to the number received for the prior period, notwithstanding the 1% reduction in the compliance rate. Similarly, the number of Declarants required to submit a Statutory Declaration as at December 31, 2022, increased by 4,001 more than the prior year.

¹ The number of Declarants required to submit Statutory Declarations increased, as a result of the GOJ Compensation Review Exercise.

² At the time of preparing this Report, the Information and Complaints Division received 33,951 (76.5%) 2022 Statutory Declarations.

INTEGRITY COMMISSION

Parliamentarians

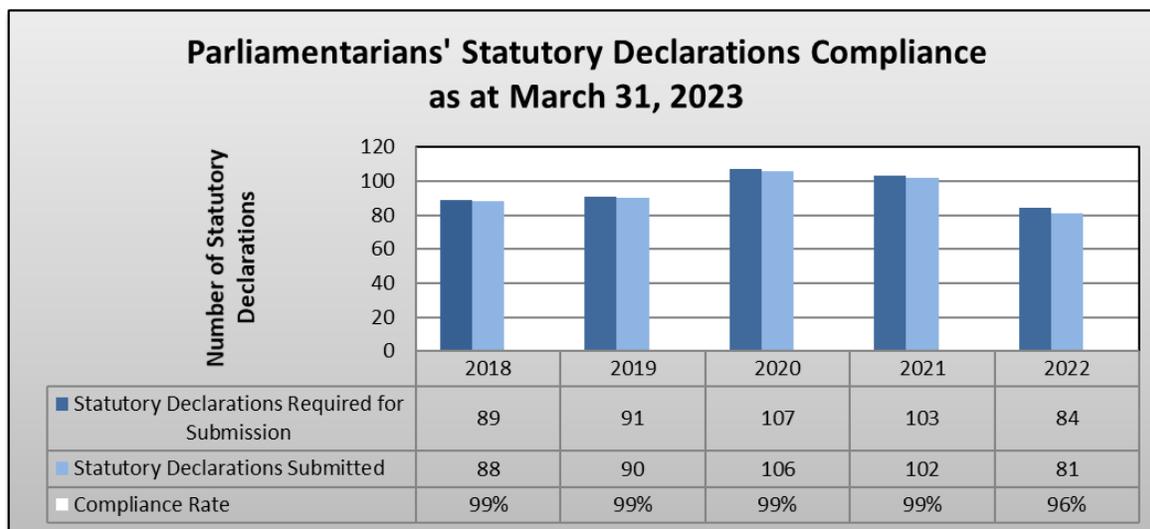
Seventy-seven (77) of the eighty-four (84) Parliamentarians who were required to file a Statutory Declaration, submitted their Statutory Declaration on or before March 31, 2023. Following the deadline date, four (4) Parliamentarians submitted their Statutory Declarations, and three (3) remain outstanding.

2022 Statutory Declarations Submission

Declarants	Declaration Date	Deadline for Submission	Number of Statutory Declarations Due for the year 2022	Statutory Declarations Submitted as at March 31, 2023	Late Submissions	Outstanding Statutory Declarations
Members of Parliament	December 31, 2022	March 31, 2023	63	58	3	2
Members of the Senate	December 31, 2022	March 31, 2023	21	19	1	1
Total Statutory Declarations			84	77	4	3

The compliance level of Parliamentarians required to file a Statutory Declaration has remained consistent over the last five (5) years. The Commission's objective is to achieve 100% compliance by the legislated deadline date each year.

The Graph below shows Parliamentarians' compliance for the years 2018, 2019, 2020, 2021 and 2022 as at March 31, 2023:



Statutory Notice to Parliamentarians

One (1) Statutory Notice was sent to a Parliamentarian with respect to the submission of a Statutory Declaration as at December 31, 2021, which was deemed invalid. The Parliamentarian submitted the Statutory Declaration within the thirty (30) day period of the Notice.

INTEGRITY COMMISSION

Public Officials

The Division received thirty-seven thousand, two hundred and thirty-five (37,235) Statutory Declarations for varied declaration periods. The foregoing is seven thousand and forty-two (7,042) less than the forty-four thousand, two hundred and seventy-seven (44,277) Statutory Declarations received in the previous period. The table below shows the number of Statutory Declarations received during April 1, 2022 to March 31, 2023 and the total compliance for each period:

Total number of Statutory Declarations Received during April 1, 2022 to March 31, 2023

Statutory Declaration Period Ended	Number of Statutory Declarations Received as at March 31, 2022	Number of Statutory Declarations Received as at March 31, 2023	Number of Statutory Declarations Received during 2022/2023
December 31, 2003-2017	257,919	258,137	218
December 31, 2018	22,011	22,378	367
December 31, 2019	23,409	24,045	636
December 31, 2020	30,943	31,631	688
December 31, 2021	29,207	32,998	3,791
December 31 2022		31,535	31,535
Total Statutory Declarations received for the period 2022/2023			37,235

The continuous submission of outstanding Statutory Declarations can be attributed to the Commission's sustained stakeholder engagement initiatives as well as the prosecution of non-compliant Declarants.

Overall Compliance Rates

The Division continues to experience steady growth with respect to compliance rates for the submission of Statutory Declarations. The table below summarizes the compliance rates for the declaration submission periods ended March 31, 2021, March 31, 2022 and March 31, 2023:

Statutory Declaration Period Ended	Number of Statutory Declarations Received as at March 31, 2021	Number of Statutory Declarations Received as at March 31, 2022	Number of Statutory Declarations Received as at March 31, 2023	Number of Statutory Declarations Expected	Compliance Rate as at March 31, 2021	Compliance Rate as at March 31, 2022	Compliance Rate as at March 31, 2023
December 31, 2018	20,253	22,011	22,378	35,000	58%	63%	64%
December 31, 2019	20,187	23,409	24,045	36,919	55%	63%	65%
December 31, 2020	23,532	30,943	31,631	40,449	58%	76%	78%
December 31, 2021	-	29,207	32,998	40,347	-	72%	82%
December 31, 2022	-	-	31,535	44,348	-	-	71%

Compliance rates, though modest, reflected an increase for all periods. The number of Statutory Declarations received for the period ended December 31, 2022 as at March 31, 2023, reflects the highest number received for any period as at the deadline date. Similarly, a ten percent (10%) increase was noted for the period ended December 31, 2021, which brought the compliance rate for that period to eighty-two percent (82%), the highest compliance rate achieved since the Commission has been in operation.

INTEGRITY COMMISSION

Compliance Rates for Senior and other Public Officials

The compliance rate for Public Officials in varied leadership categories is detailed in the table below:

Public Official Category	Estimated Number of Statutory Declarations required for the period ended December 31, 2022	Statutory Declarations Received as at March 31, 2023	Compliance Rate as at March 31, 2022	Compliance Rate as at March 31, 2023
Judiciary Officers	111	85	77%	77%
Councillors	216	156	71%	72%
Permanent Secretaries	16	15	87%	94%
Head of Entities	175	148	90%	85%
Other Public Officials	43,746	31,054	72%	71%

The above table demonstrates improvement in the compliance rates of public officials in leadership. In the prior period, these categories of public officials were the most compliant, second to the Parliamentarians. The leadership category has again demonstrated the commitment to comply with the requirement of the Integrity Commission Act, 2017.

Data Entry Project

The Data Entry Project was implemented in 2020 to digitise Statutory Declaration information to support the Electronic Declaration System (eDS); which will improve the receipt and management of Statutory Declarations.

The Data Entry Project continued with the assumption that the Data Entry Officers would have been posting consistently throughout the year and the eDS would have been launched in the last quarter of 2022 to facilitate the submission of statutory declarations electronically for the 2022 Statutory Declarations Intake. However, both variables did not materialize.

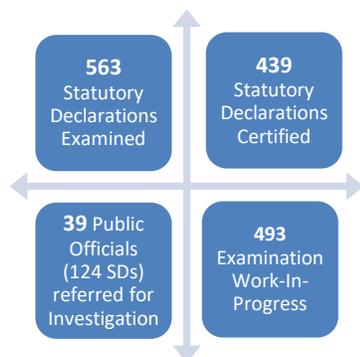
The table below details the progress of the Project:

Posting of Details from Statutory Declarations (Data Entry Project)

Number of Statutory Declarations Posted for the period April 1, 2022 to March 31, 2023	Number of Statutory Declarations Posted as at March 31, 2023	Number of Statutory Declarations Postings Outstanding as at March 31, 2023
30,716	91,792	136,222

Statutory Declarations (SDs) - Examination

**Current Reporting Period
As at March 31, 2023**



Matrix of Statutory Declaration Outcomes: 2018/2019 – 2022/2023

Category	Number of Statutory Declarations Received	Number of Statutory Declarations Examined	Number of Statutory Declarations Certified	Number of Public Officials Referred for Investigation	Examination Work-In-Progress
Parliamentarians	467	196	119	10	52
Councillors	915	66	39	3	17
Senior Public Officials	834	89	68	7	41
Other Public Officials	140,838	705	567	32	383
Total	143,054	1,056	793	52 (263 SDs)	493

Examination and Certification of Statutory Declarations

During the reporting period, the Commission examined five hundred and sixty-three (563) Statutory Declarations, using a risk-based approach and stratified random sampling, and certified four hundred and thirty-nine (439) of those Statutory Declarations, as highlighted in the table below:

Statutory Declarations Examined and Certified during 2022/2023 Declaration Period	Parliamentarians		Public Officials	
	Examined	Certified	Examined	Certified
2018	11	4	121	96
2019	13	6	152	122
2020	15	8	159	123
2021	9	6	81	72
2022	-	-	2	2
Total Statutory Declarations	48	24	515	415

The process for the Examination of Statutory Declarations is time-consuming, highly intensive and analytical. The process includes the review of Statutory Declarations submitted by the Declarant, and the request for information to complete the Examination (an iterative process). This iterative process can sometimes take several months, since, in most instances, the information required emanates from institutions, over which the Declarant has no control. Further, the Commission remains considerate of the exigencies which may be experienced by Public Officials, that at times occasion several requests for extension. The process also includes other actions, such as the request for information by the Integrity Commission from multiple third-party entities, both local and overseas, to enable independent verification of relevant information. Upon receipt of the requisite information from Declarants and third-party entities, as well as the conclusion of other actions, a rigorous analysis is conducted and then a recommendation is made to the Commissioners.

INTEGRITY COMMISSION

The Commission will continue to explore ways to improve the efficiency of the Examination process, and it is anticipated that with the implementation of the eDS, greater efficiencies will be achieved.

Matrix of Statutory Declarations' Examination and Outcomes

The table below provide details of the Matrix of Statutory Declarations' Examination and Outcomes during the period April 1, 2018 to March 31, 2023:

DECLARANT CATEGORIES	Number of Statutory Declarations Received	Number of Statutory Declaration Examined	Number of Statutory Declarations Certified	Number of Public Officials referred to the Director of Investigation for Illicit Enrichment and/or False Information	Number of Work-In-Progress Examination
MEMBERS OF PARLIAMENT	357	159	88	10	47
MEMBERS OF THE SENATE	110	37	31	-	5
COUNCILLORS	915	66	39	3	17
PERMANENT SECRETARIES	78	20	16	2	11
HEADS OF ENTITIES	756	85	52	5	20
OTHER PUBLIC OFFICIALS	140,838	705	567	32	383
TOTAL	143,054	1,056	793	52³	483

It is important to highlight from the Matrix above, the number of Statutory Declarations Certified in relation to those Examined. Notwithstanding, the Commission remains concerned about the number of false Statutory Declarations being submitted by Declarants. In this regard, the Commission continues to remind Declarants, through engagements and public education campaigns, to ensure that the information being submitted is accurate, and that due care is taken when preparing Statutory Declarations.

Time taken by Declarants to submit Additional Information

The time taken by Declarants to submit additional information to conclude the Examination of Statutory Declarations has resulted in significant inefficiencies for the Division, as Declarants request legitimate multiple extensions. In many instances, information which should have been provided with Statutory Declarations were not appended to the Statutory Declarations. With the pending launch of the Electronic Declaration System (eDS), the System will require all supporting documents to be properly uploaded before a Statutory Declaration is accepted, hence making the process of Examination more efficient.

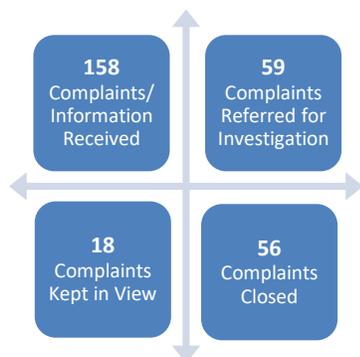
³ Some Public Officials were referred for prosecution for multiple Statutory Declaration periods, a total of two hundred and sixty-three (263) Statutory Declarations.

Human Resource

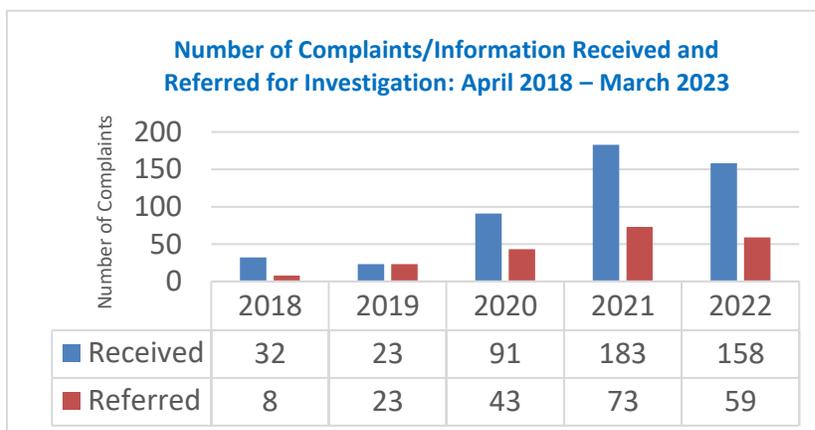
For the period 2018/2019 to 2019/2020, the Division did not undertake Examinations for Other Public Officials' Statutory Declarations, and utilised the limited human resource, two (2) persons, to examine Parliamentarians' Statutory Declarations only. However, with the increased staff complement and the re-organisation of the Division, which was completed in the Financial Year 2022/2023; the Division will be poised to exponentially increase its Examination output, once the eDS is fully implemented.

Complaints Management

Current Reporting Period As at March 31, 2023



Five Year Comparison



For the period under review, one hundred and fifty-eight (158) complaints and information were received or identified for Assessment by the Division. These came through various medium such as: the Integrity Commission’s web portal, Information Gathering Framework, by letters, via telephone calls, emails and walk-ins.

The outcome of complaints and information received by the Division during the period of April 1, 2022 to March 31, 2023, are detailed in the table below:

Description of Information	Complaints/ Information Received	Number of Referral	Number of Closure	Number of Matters in Keep-In-View Status	Number of Matters in Work-In-Progress Status
Complaints	76	30	32	1	13
Director’s Discretion	82	15	24	17	26
Total	158	45⁴	56⁵	18	39

The average time taken to process a complaint is dependent on the information presented to the Integrity Commission. Information received is sometimes vague and necessitates further verification to validate its authenticity, in order to determine the required steps and actions necessary to resolve such matters.

On average, the process of receiving, logging, acknowledging, assessing, reviewing and referring a complaint can take approximately five (5) to twenty (20) business days. However, there are others that have exceeded the established timelines due to their complexity and level of research required.

⁴ Forty-five (45) of Complaints/Information received during this period was referred for Investigation. The other fourteen (14) referrals were Complaints/Information received in the prior period.

⁵ These matters include those not in the Integrity Commission’s jurisdiction, instances where there is insufficient information, and the assessment concluded that such allegations were inaccurate.

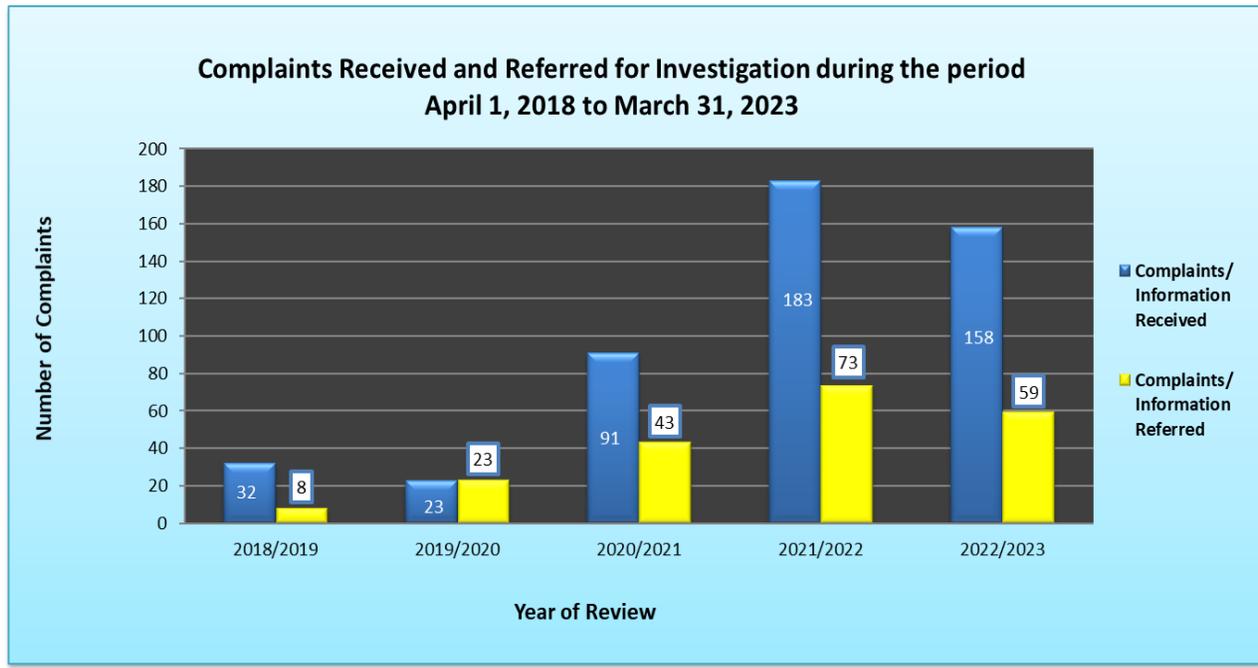
INTEGRITY COMMISSION

Referrals

Following the assessment of complaints and information, and upon the approval by the Director of Information and Complaints, the matters are referred to the Director of Investigation for action pursuant to Section 38(1)(d) of the Integrity Commission Act, 2017.

For the period under review, fifty-nine (59) matters were referred to the Director of Investigation, fifty-six (56) matters were closed and eighteen (18) matters are being kept-in-view.

The Graph below represents five (5) years Comparison of Complaints and Information received and referred by the Division:



Protected Disclosures

	Number of Public Bodies that submitted Protected Disclosures Procedural Guidelines	Number of Protected Disclosures Received by Public Sector Entities	Number of Protected Disclosures Received by the Integrity Commission
2021/2022	16 (9%)	1	4
2022/2023	149 (81%)	6	7

The Information and Complaints Division focused on the operationalisation of the Protected Disclosures Act, 2011. The Protected Disclosures Work Programme was approved by the Information and Complaints Committee in 2021 and implementation continued during April 1, 2022 to March 31, 2023.

The Work Programme includes; the establishment and staffing of a Protected Disclosure Section, Internal Capacity Building and finalisation of the Protected Disclosure Process, Engagement with Prescribed Persons, Publication of the Protected Disclosures Procedural Guidelines Gazette, Requisition of Public Bodies to submit draft Protected Disclosures Procedural Guidelines, Development of a Technology Platform, Capacity Building for Designated Officers, Public Education Campaign, and Monitoring and Reporting.

1. The Protected Disclosure Section is currently staffed with three (3) of the four (4) employees approved on the Organizational Structure.
2. One hundred and ninety-seven (197) Public Bodies were requisitioned to prepare their Protected Disclosures Procedural Guidelines (PDPG) in accordance with the Act. Of the 197 Public Bodies, only 185 are required to submit PDPG. As at March 31, 2023, a total of one hundred and forty-nine (149) Public Bodies submitted their draft PDPGs. The Integrity Commission has approved the PDPGs for one hundred and nine (109) Public Bodies⁶.
3. The Integrity Commission is currently at the Procurement Stage to acquire the Complaints and Protected Disclosures Management System.
4. Training of Designated Officers within the Public Sector is scheduled to commence on April 17, 2023 with five (5) Cohorts, in the first instance. This initiative is as a result of a partnership between the Management Institute for National Development (MIND) and the Integrity Commission.
5. The Division facilitated sixty-six (66) Protected Disclosures Engagements with Senior Management of Public Bodies and twenty-five (25) Sensitisation sessions were held with the general staff members.
6. A Public Relations Campaign was initiated in March 2023 and three (3) Billboards were strategically placed in Half way Tree, on Washington Boulevard and in Sam Sharpe Square, Montego Bay. Under this Initiative,

⁶ The Protected Disclosures Annual Report for the year 2022, to be tabled by the Minister of Justice, will provide details regarding the Public Bodies that have not submitted a Protected Disclosures Procedural Guidelines.

INTEGRITY COMMISSION

other public education programmes will be launched to raise awareness of the Protected Disclosures Act, 2011.

7. Sixty-nine (69) Public Bodies have commenced the operationalisation of their Protected Disclosures Procedural Guidelines, pursuant to the Protected Disclosures Act. These Public Bodies have submitted their Monthly Reports in keeping with the requirement of the Protected Disclosures Act, 2011.

Investigation of certain matters of Improper Conduct and Occupational Detriment

The Information and Complaints Division was appointed by the Commissioners to undertake the Designated Authority functions under the Protected Disclosures Act, as well as to conduct Investigations of certain Improper Conduct and Occupational Detriment matters.

Protected Disclosures Received by the Designated Authority

For the period under review, seven (7) Disclosures were received by the Division, and two (2) Protected Disclosures matters were carried forward from the previous period. Eight (8) of these Disclosures were reviewed and assessed; one (1) was referred to the Director of Investigation and seven (7) matters are being progressed. Of the seven (7) matters, one (1) employee was encouraged to make the disclosure to the Designated Officer appointed by the Employer on the basis that the matter could be resolved within the Organization.

Information and Complaints Division Major Initiatives and the Way Forward

Electronic Declaration System (eDS)

The time taken to approve the Legislative Framework remained an obstacle to fully implement the Electronic Declaration System (eDS). Notwithstanding, on April 28, 2023, the Permanent Secretary of the Office of the Prime Minister wrote to the Commission advising that the Cabinet gave approval for the promulgation of Regulations, pursuant to Section 64 of the Integrity Commission Act and Section 14 of the Electronic Transaction Act, to provide for the use of electronic forms, and the “...*Ministry will proceed with issuing drafting instructions to the Office of the Parliamentary Counsel...*”

It is anticipated that the eDS will be launched in time for the 2023 Statutory Declaration Intake.

Upon full implementation of the eDS, it is anticipated that the Division will achieve significant efficiencies and improvement with respect to the following:

1. The turnaround time for the Examination and Analysis of Statutory Declarations;
2. Compliance Rate for the Filing of Statutory Declarations;
3. The process for the identification of non-compliant Declarants;
4. Electronic Storage and security of Statutory Declaration Information; and
5. The use of automated means to communicate with Declarants.

Regulations – Amendment to the Third Schedule of the Integrity Commission Act, 2017

Section 64 of the Integrity Commission Act, 2017, states, *inter alia*, that the Commission may make regulations to amend the Third Schedule, for which “...*Regulations made... shall be subject to affirmative resolution*”

The primary objective of preparing the draft regulations for the Third Schedule is to strengthen the Commission's analysis process, clarify certain ambiguous sections and to incorporate feedback received from Declarants over the years.

The Third Schedule was also amended in 2020 to provide for the electronic submission of statutory declarations by Public Officials (Declarants).

The Third Schedule is the Commission's primary data collection tool which aids with the determination of a Declarant's Net Worth; to ensure that any growth in assets or reduction in liabilities are sufficiently supported by legitimate income.

The legitimacy of the assets, liabilities and income declared by Declarants must be validated by the Commission's research and Third-Party verification processes, in the first instance, to ensure that there is no concealment.

In effect, the true and complete disclosures made by Declarants, coupled with the Commission's research and Third-Party verifications, will inform its analysis and consequent findings.

Succinctly put, the Commission must ensure that there is no Illicit Enrichment, prior to certifying a Statutory Declaration.

Some of the recommended inclusions are: disclosure of other financial assets, such as cryptocurrency and digital currency, financial statements for any company which the declarant is a beneficial owner, cost of property

INTEGRITY COMMISSION

improvements, trust property and blind trust, Government contracts or subcontracts, Board memberships and whether the declarant is a politically exposed person.

By way of letter dated August 25, 2021, the Office of the Prime Minister wrote to the Integrity Commission advising that the Regulations regarding the Third Schedule of the Integrity Commission Act have been reviewed by the Integrity Commission Parliamentary Oversight Committee. The Commission was invited to a Parliamentary Oversight Committee Meeting on October 14, 2021, to provide clarification on the changes made in the amendment of the Third Schedule.

The Chair of the Integrity Commission Parliamentary Oversight Committee advised that a meeting would be convened in early 2022. However, as at the date of this Report, no communication had been received regarding the date of a meeting.

Revision of Total Annual Emoluments – Requirement to File a Statutory Declaration

A Proposal for the revision of total annual emoluments for the filing of Statutory Declarations in the year 2023 was sent to the Office of the Prime Minister (OPM), and the Integrity Commission awaits approval of the Cabinet and Parliamentary Ascension. Once approved, the Division will be in a better position to focus on Examining Statutory Declarations submitted from High-Risk Declarants.

Partnership and Relationship Building

Partnership and Relationship Building remains at the core of every activity undertaken by the Information and Complaints Division. The Division continued its effort through engagements with Public Bodies and other key stakeholders during the period April 1, 2022 to March 31, 2023. The Division engaged the Management Team of sixty-six (66) Public Bodies, conducted twenty-five (25) Protected Disclosures Sensitization Sessions to general staff and fifteen (15) presentations on Statutory Declaration to specific target groups.

Assessment of Declarants' Compliance

The Division embarked on its 100% Compliance Initiative in 2021 by assessing the compliance of Declarants employed to approximately one hundred and ninety (190) Public Bodies to inform the processes for Statutory Notices and Referrals. In this respect, Declarants from four (4) Public Bodies were assessed and required by way of Notice to submit their outstanding Statutory Declaration(s). During the reporting period, one hundred and eighty-eight (188) Statutory Notices were served to Declarants with outstanding Statutory Declaration(s). The Division will continue this initiative until full compliance is achieved.

2022 Gazette - Positions and functions required to file a Statutory Declaration

A review of the 2021 Gazette was conducted through a consultative process with targeted Public Bodies and other key stakeholders to determine the amendments to the 2022 Gazette. The process also included the review of Public Bodies' Organisational Structures. The Gazette was published on December 14, 2022.

Capacity Building for Designated Officers

The Information and Complaints Division partnered with the Management Institute for National Development (MIND) to develop a robust training curriculum for the delivery of training to Designated Officers appointed pursuant to the Protected Disclosures Act, 2011. The course is entitled; Protected Disclosures Act, 2011 – Training for Designated Officers.

INTEGRITY COMMISSION

The Curriculum includes Legislative Framework in Jamaica, Anti-Corruption and Good Governance, the Protected Disclosures Act, 2011, the Role of the Designated Officer, Disciplinary Administration, Investigative Techniques and Report Writing.

MIND will deliver training to five (5) cohorts (twenty-five (25) trainees per cohort) in the first instance and thereafter, will integrate the programme into their Annual Course offering.

Chapter 6 - Investigation Division

INVESTIGATION DIVISION DASHBOARD

Investigation Arm - Units: CPCI/ DFI/ FAAU

Current Reporting Period 2022/2023

Current Reporting Period



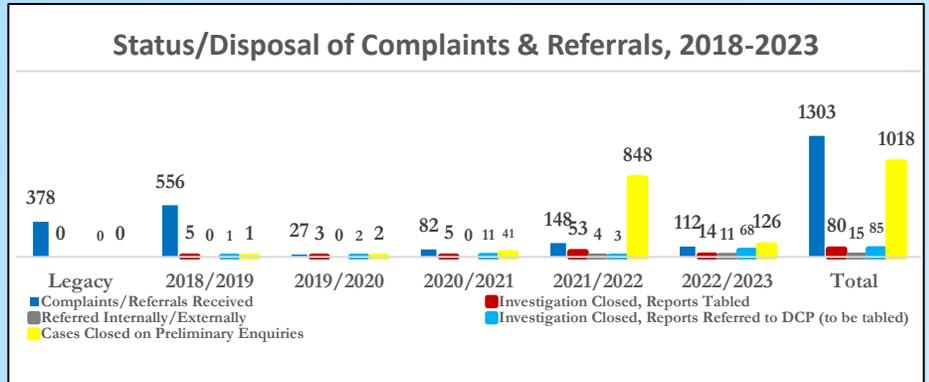
112 Complaints/Referrals Received

14 Investigations Closed, Reports Tabled

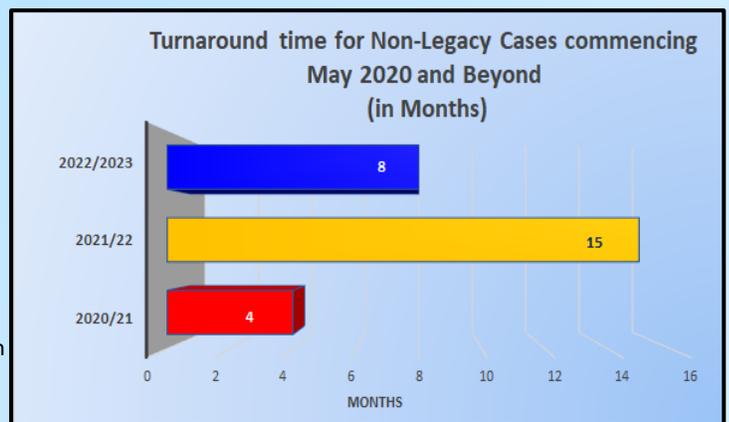
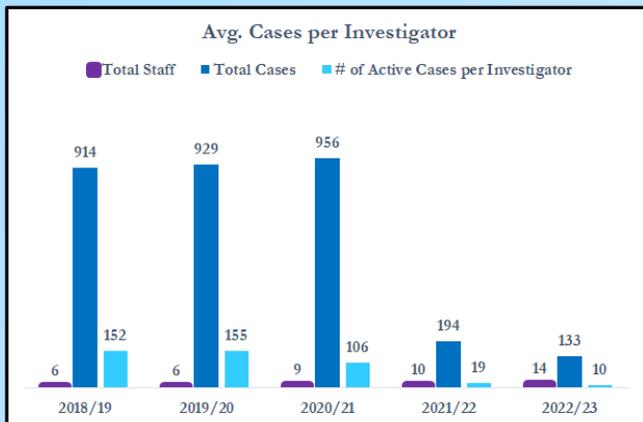
126 Cases Closed on Preliminary Enquiries

68 Investigations Closed, Referred to DCP (to be tabled)

Investigation Arm – Five Year Comparison



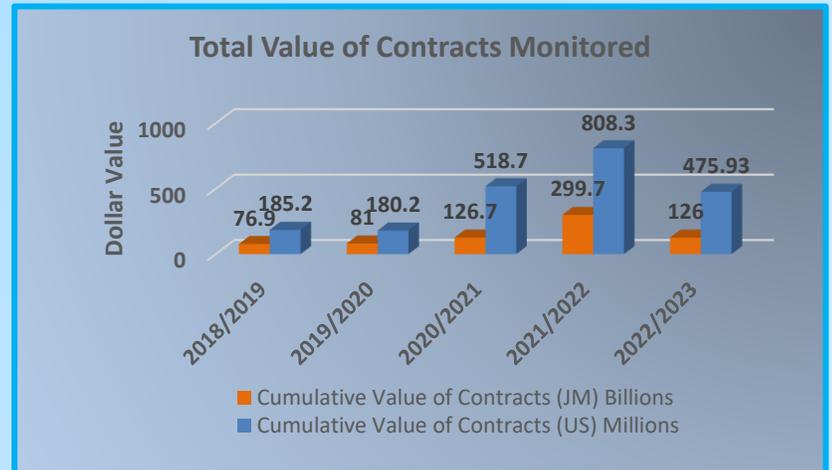
Investigation Arm – Five Year Comparison



Monitoring Arm - Units: CMU/ LADA

Current Reporting Period 2022/2023

Five Year Comparison

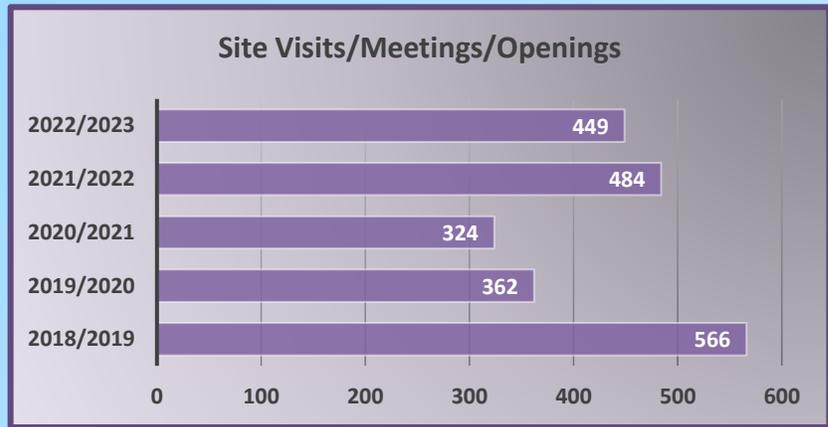


Monitoring Arm - Units: CMU/ LADA

Current Reporting Period



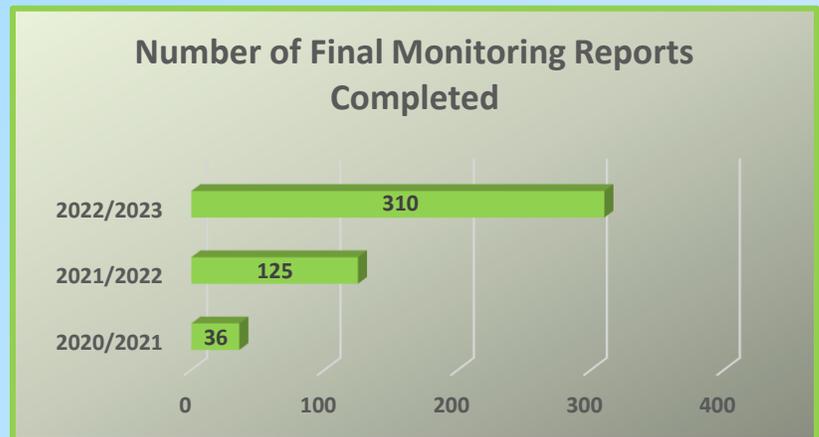
Five Year Comparison



Current Reporting Period



Three Year Comparison



Current Reporting Period



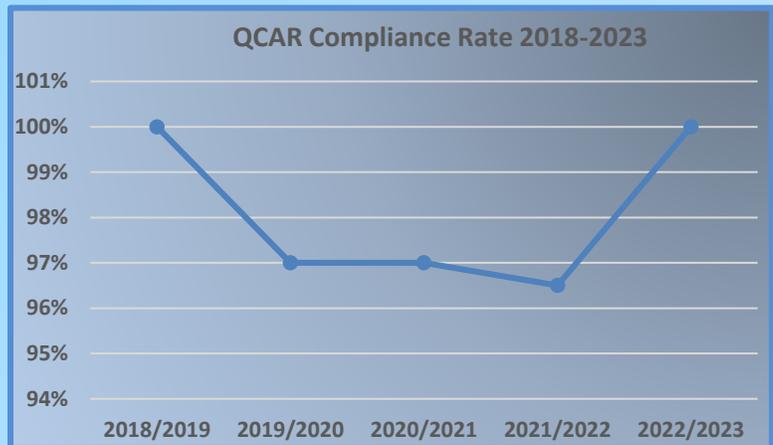
⁸ Monitoring Arm: CMU – Contract Monitoring Unit, LADA – Licensing and Asset Divestment/Acquisition Unit

Quarterly Contracts Award Report - Compliance

Current Reporting Period



Five Year Comparative Chart

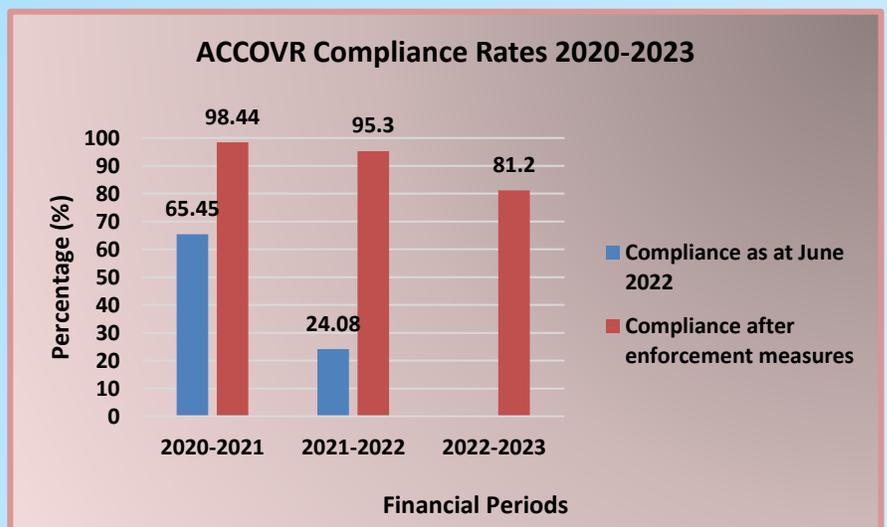


Annual Contract Cost Overrun and Variation Report - Compliance

Current Reporting Period



Three Year Comparative Chart



Activities undertaken during the reporting period

- Launch of new monitoring initiative in respect of Lesser Competitive Procurement Methodologies
- Launch of the Enforcement Programme for the ACCOVR and QCAR⁹
- Launch of Prescribed Licensing Database and Monitoring Programme

Constraints

- Inadequate human resource
- Delays in case completion due to non-compliance from Public Officials

Going Forward

- Reduction in turnaround time in complex and less complex cases to under 10 months and 8 months, respectively.
- Launch of online platform in respect to Land and other Asset Divestment/Acquisition.

INVESTIGATION DIVISION DASHBOARD

¹⁰

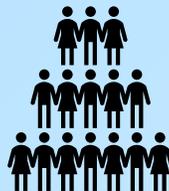
Human Resource Capacity

Overall Human Resource



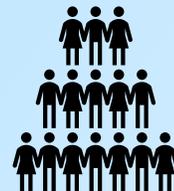
63%
(36 Staff Members)

Investigation Arm Human Resource



54%
(20 Staff Members)

Monitoring Arm Human Resource



80%
(16 Staff Members)

⁹ ACCOVR – Annual Contracts Cost Overruns and Variations Report, QCAR – Quarterly Contract Award Report

¹⁰ Overall Human Resource - Percentage of the Division's establishment

STATISTICAL PERFORMANCE – MATTERS INVESTIGATED**Contract, Procurement & Corruption Investigation (CPCI) Unit**

During the 2022/2023 financial year, a total of fifty nine (59) complaints were referred for investigation. The matters related to, inter alia, (a) allegations of impropriety and irregularity in the award of GOJ contracts, (b) allegations of conflict of interest and nepotism in the award and implementation of Government of Jamaica (GoJ) contracts, (c) allegations of corruption and breaches of the Corruption Prevention Act, (d) allegations of abuse and misuse of public funds, (e) breaches of the GoJ procurement procedure, the Public Bodies Management and Accountability Act and the Financial Administration and Audit Act and other Financial Irregularities in the implementation and administration of GOJ contracts by Public Bodies; (f) allegations of conflicts of interest, and corruption involving Directors of Public Boards; (g) allegations of corruption in the award of GOJ contracts, and impropriety in the management and governance of Public Bodies.

Of the fifty-nine (59) complaints referred, forty four (44) matters were pursued during the reporting period. 36% of the cases pursued, that is, sixteen (16) investigations are ongoing and are at varying stages of the investigation process, pursuant to Section 33 of the Integrity Commission Act.

In addition to the aforementioned cases referred, eighteen (18) cases were terminated in accordance with Section 47, of the Integrity Commission Act, six (6) cases were referred externally to Competent Authorities, which were outside the Commission's remit, and four (4) were referred internally for monitoring by the monitoring arm of the Investigation Division.

Overall, at the end of the 2022/2023 financial year, a total of sixty nine (69) matters were closed. A breakdown of the closed matters is provided below:

Completed/Closed Matters Over the Period 2022/23	
Matters Tabled in Parliament	12
Matters Closed on preliminary enquiries	51
Matters Referred to Competent Agencies	6
Total Completed Matters Over the Period	69

Twelve (12) reports were tabled in the Houses of Parliament over the referenced period (see Appendix 4).

INTEGRITY COMMISSION

The table below represents the time taken to complete cases which were tabled in the House of Representatives.

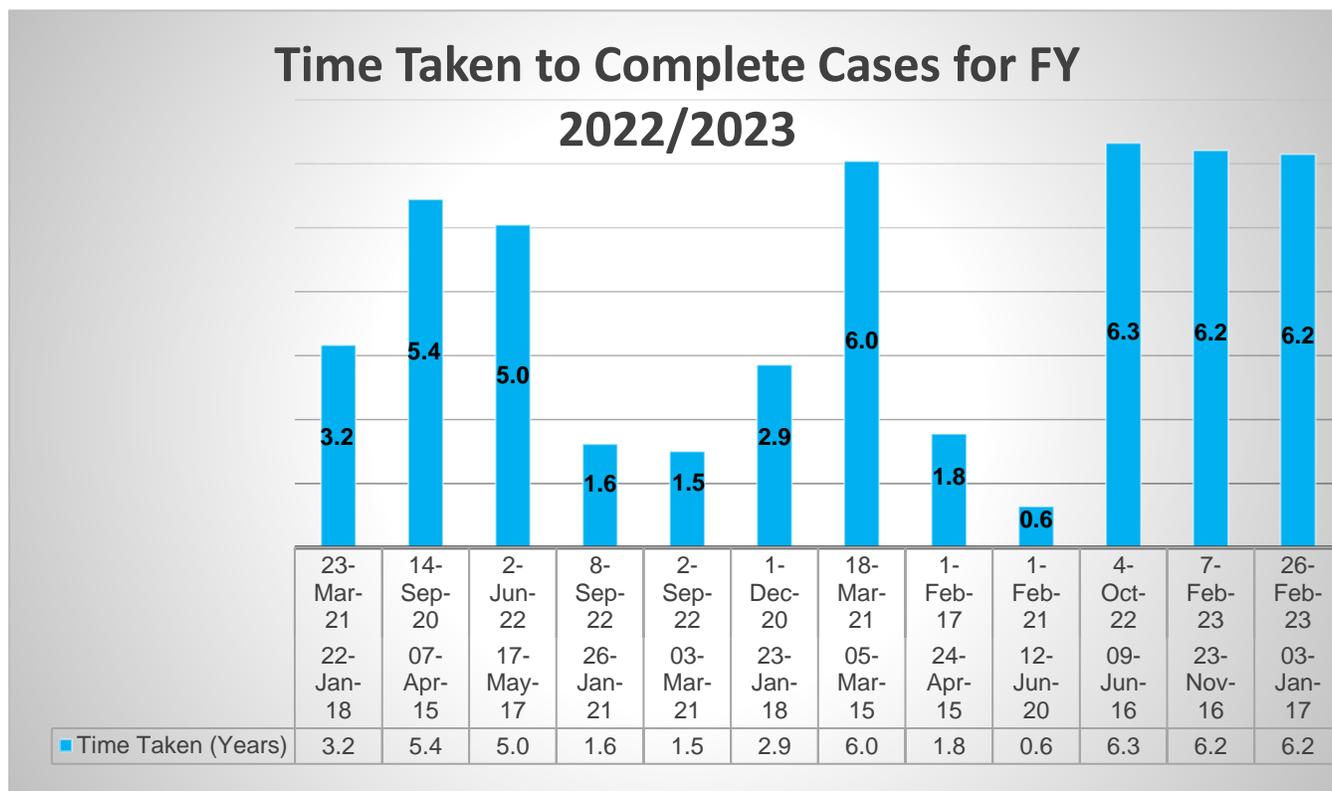


Figure 1: Time taken to complete cases.

Historical Comparison of Cases Investigated for the Period April 2018 – March 2023

Since the inception of the Integrity Commission, the Investigation Division received 226 complaints. Of this number, 139 cases were pursued. Of the cases enquired into, 106 or 76% were completed. The table below provides a breakdown of the cases over the period April 2018 – March 2023:

Complaints Received from the Public Only							
Cases	Legacy Cases	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	Total
Complaints Received	20	8	23	43	73	59	226
Complaints Pursued	20	7	3	24	41	44	139
Closed after Investigation- Report Tabled		5	3	5	14	12	39
Referred Internally	0	0	0	0	3	5	8
Referred Externally	0	0	0	0	1	6	7
Closed on Preliminary Enquiry (not pursued)		0	0	0	1	52	53

INTEGRITY COMMISSION

Declarations and Financial Investigations Unit

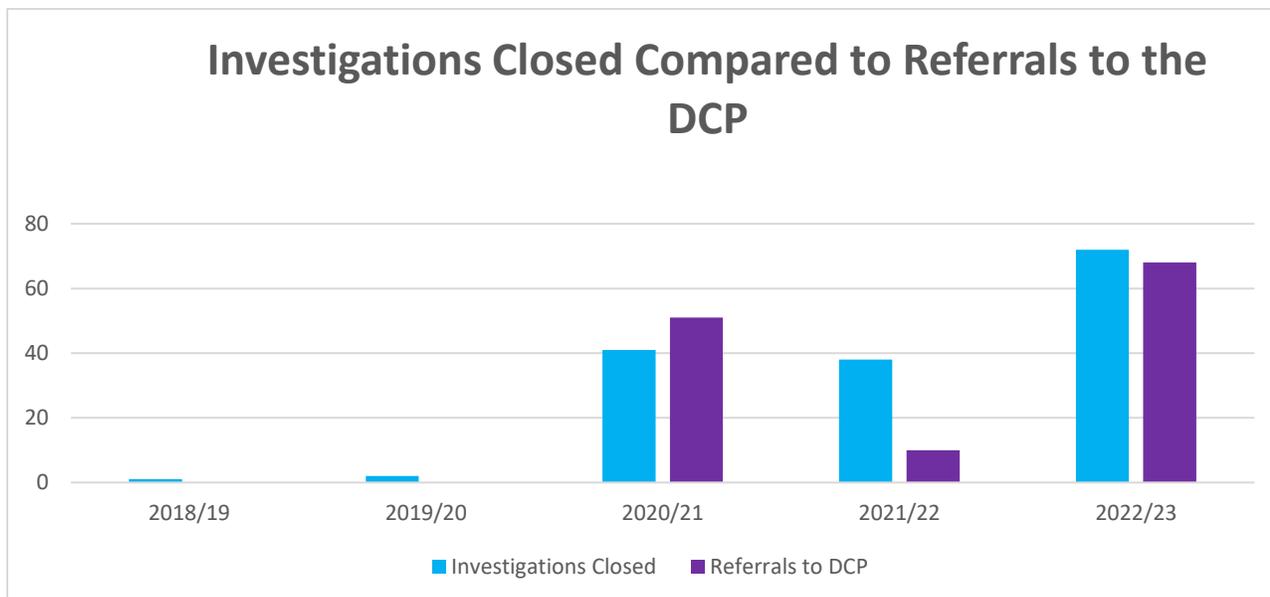
The Declarations and Financial Investigations Unit, inter alia, conducts investigations pursuant to Section 43 of the Integrity Commission Act and Section 14 of the Corruption Prevention Act, into the Statutory Declarations filed by public officials. These investigations include matters of non-compliance such as Failure to File Statutory Declarations, or Failure to Comply with a Request for Information, Making a False Statements in a Statutory Declarations and Illicit Enrichment allegations.

At February 22, 2018, the Integrity Commission assumed responsibility for three hundred and fifty-nine (358) legacy investigations which increased to nine hundred and six (906) by the end of the financial year (FY) 2018/19. In FY 2021/22, eight hundred and forty-seven (847) of these matters were reviewed and closed. At the end of FY 2022/23, the Unit had a total of seventy-four (74) opened investigations. Over the last five years a total of one hundred and twenty nine (129) cases were referred to the Director of Corruption Prosecution (DCP), 68 of these were referred during FY 2022/23. These 68 matters took on average 279 days to be investigated. Over the last five years a total of Forty-one (41) of Investigation reports were tabled in both Houses of Parliament.

The tables and figures below portray the particulars of the financial investigations' portfolio over the period 2018 - 2023:

Declarations and Financial Investigations 2018 - 2023					
	2018/19	2019/20	2020/21	2021/22	2022/23
Total Investigations	906	906	913	121	74
Investigations Closed	1	2	41	38	72
Average Days to Complete Investigations	2244	1851	756	2404	329
Matters Reviewed and Closed				847	2
Investigations Closed within 6 Months	0	0	0	1	45
Referrals to DCP	0	0	51	10	68
Average Days to Complete Cases Referred to DCP			758	975	279
Reports Tabled	0	0	0	39	2

*



Investigations Conducted and the Cases referred to the DCP:

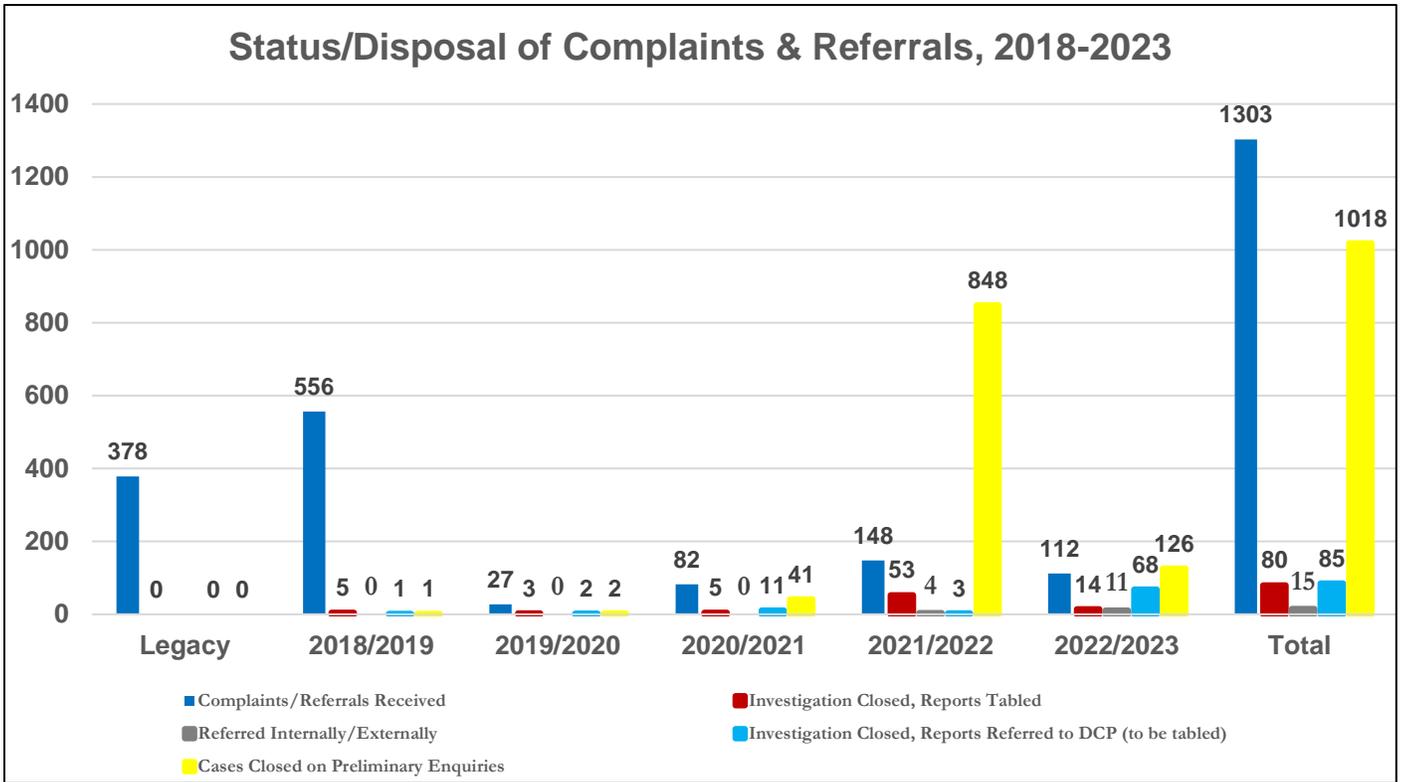
Historical Comparison of Cases Investigated for the Period April 2018 – March 2023

Since the establishment of the Integrity Commission, the Investigation Division completed approximately 83% of investigations pursued, subsequent to the receipt of over 1308 referrals/complaints. A breakdown is provided in the table and graph below:

***See Appendix 1 for days taken to complete the investigation of complaints and referrals.**

Complaints from the Public and Statutory Declaration Referrals							
	Legacy Cases	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	Total
Complaints/Referrals Received	378	556	27	82	148	112	1303
Investigation Closed, Reports Tabled		5	3	5	53	14	80
Referred Internally/Externally** ¹¹		0	0	0	4	11	15
Investigation Closed, Reports Referred to DCP (to be tabled)		1	2	11	3	68	85
Cases Closed on Preliminary Enquiries		0	0	0	848	54	902

¹¹ **Referred internally means: Cases referred to a unit or division of the Commission
 Referred externally means: Cases referred to a Competent Authority



Status/Disposal of Complaints and Referrals

Contract Monitoring Unit

The Contract Monitoring Unit is one of the key components of the Investigation Division and is responsible for the monitoring of the award, implementation and termination of Government Contracts. The Unit is comprised of two (2) sub-units, namely, (i) the Construction Contracts Inspectorate (CCI) sub-unit and (ii) the Non-Construction Contracts Inspectorate (NCCI) sub-unit. Overall, the Unit currently has a complement of one (1) Manager, three (3) Senior Inspectors and seven (7) Inspectors. However, at full capacity the Unit will include one (1) additional Senior Inspector and another Inspector, bringing the total number of staff members in the Unit to thirteen (13).

The activities of the respective sub-units over the reporting period are detailed below.

Monitoring of Construction Contracts

The categories of projects that are monitored include Public Infrastructure, Housing, Mechanical and Electrical contracts/projects being implemented by various Ministries, Departments and Agencies of the Government of Jamaica (GOJ) or any authorized personnel acting on behalf of the GOJ. Additionally, the unit provides advice on procurement matters to these entities.

Monitoring of a project may commence at the pre or post contract phase. Generally, it commences when GOJ entities place advertisements in the various news media, after which an Inspector is assigned to monitor the project until final completion. On average, each Inspector monitors just over one hundred (100) projects.

The monitoring process includes the attendance of CCI representatives at tender openings, site meetings/visits and the compiling of monitoring reports. In circumstances where an issue is identified during the pre or post contract phase of a project, the procuring entity is engaged on the matter either verbally or by way of a formal letter in order for a resolution to be found at the earliest stage of the process, consistent with the applicable procurement and contract guidelines, policies and legislation.

During the period April 1, 2022 to March 31, 2023, the Construction Contracts Inspectorate monitored the Pre and/or Post Contract phases for Six Hundred and Sixty-Two (662) contracts. The cumulative value of the construction contracts that were monitored was J\$91,685,639,059.92 and US\$620,158,440.59.

During the same period, the Construction Inspectors made a total of Two Hundred and Seventy-Two (272) site visits.

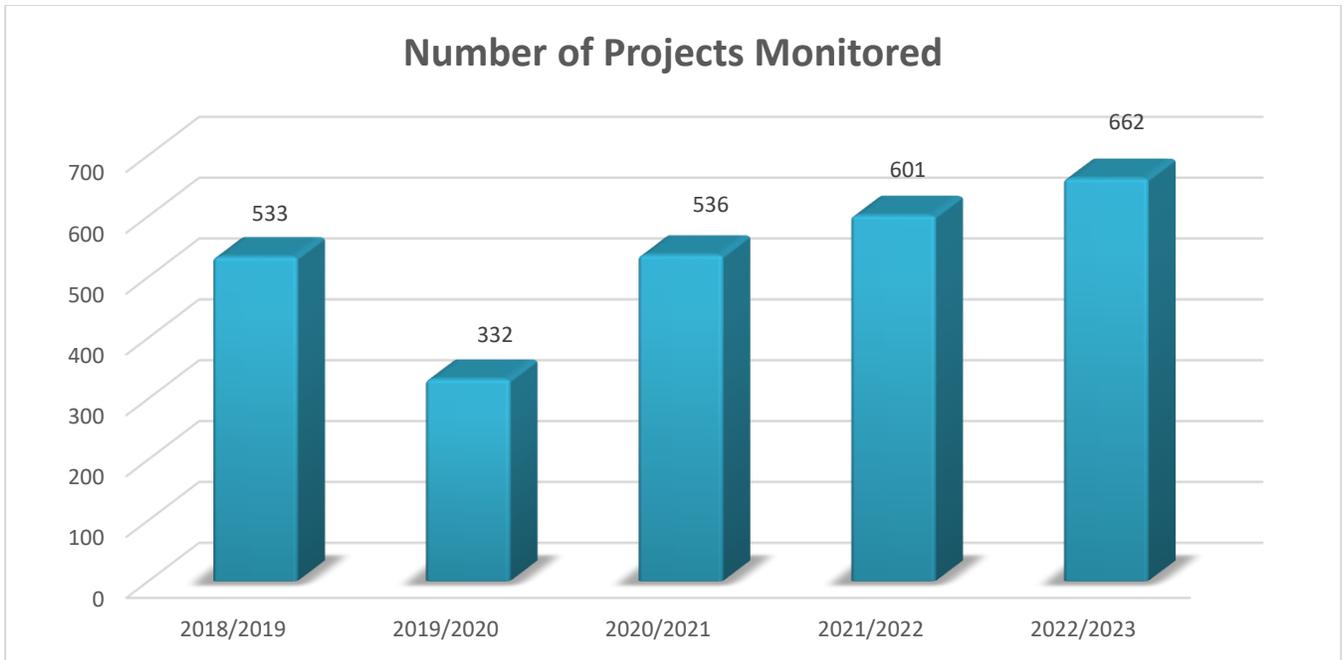
The Construction Contracts Inspectors attended one hundred and thirteen (113) site meetings and were involved in the monitoring of nine (9) Practical Completion Inspections. At the end of the reporting period, the Inspectors travelled a total of 90,689 kilometres for the purpose of discharging their monitoring duties island-wide.

INTEGRITY COMMISSION

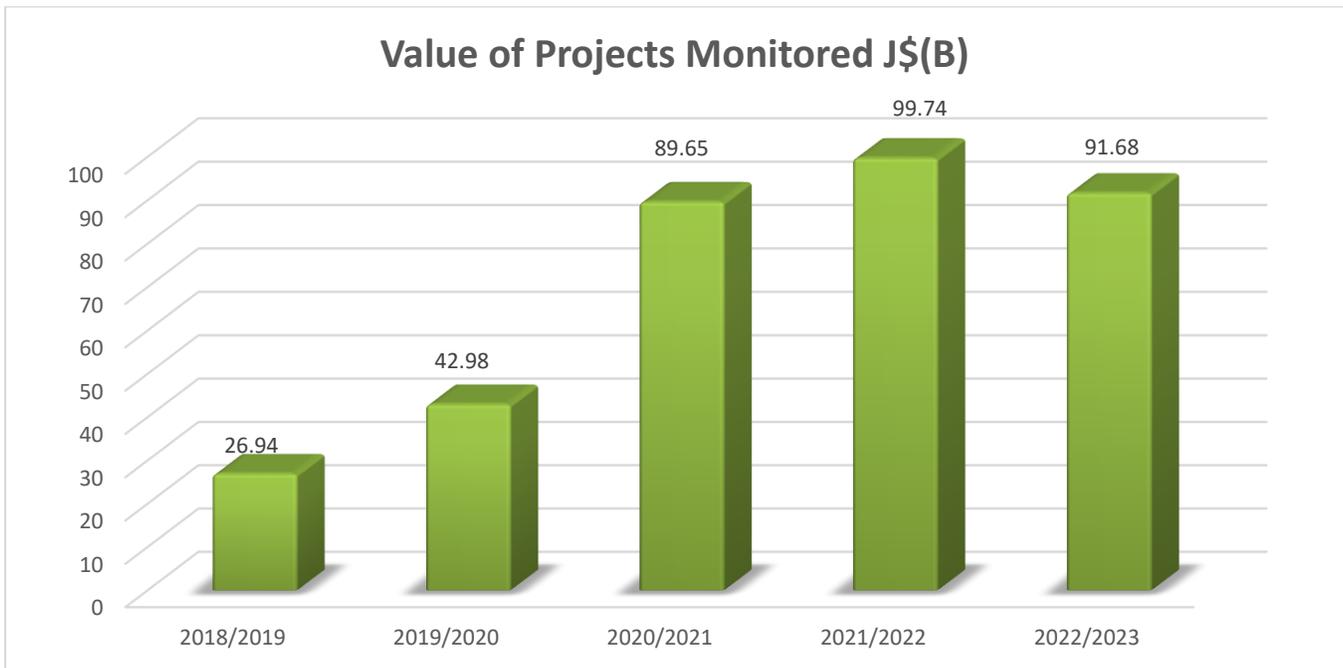
The table below details the statistics relating to the performance and activities of the CCI for the reporting period juxtaposed with data from previous years

Construction Contracts Unit Key Statistics

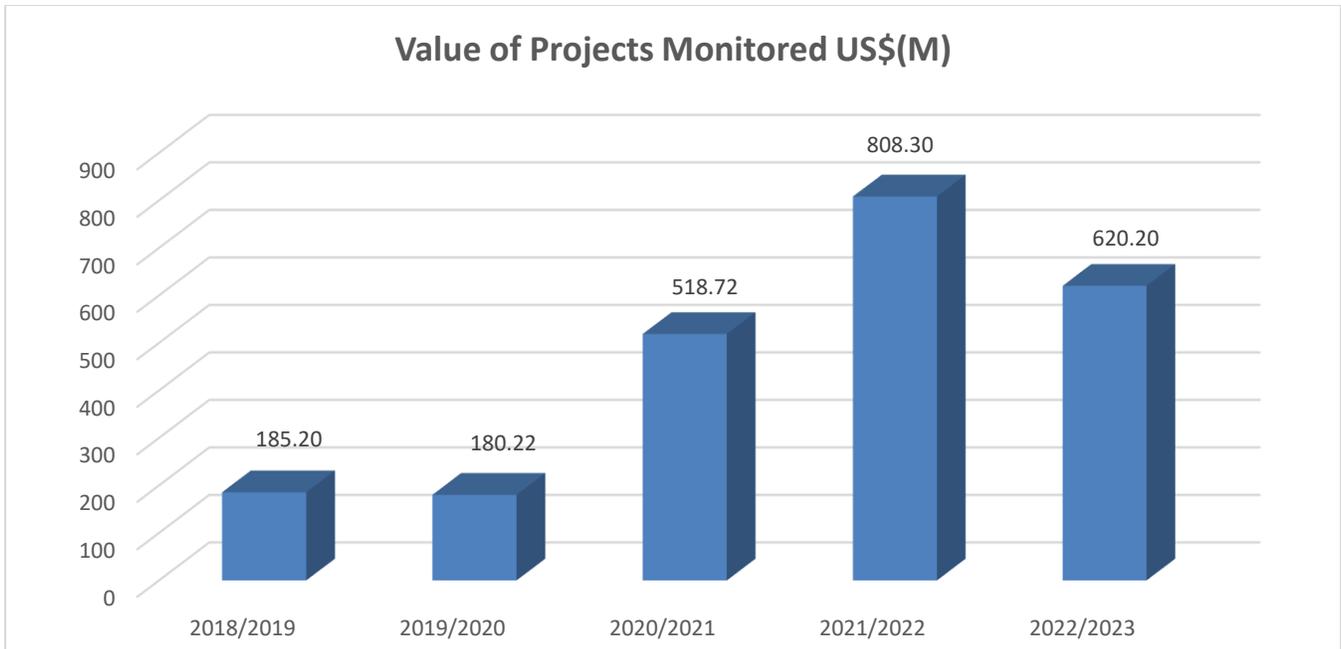
Data April 1, 2018 – March 31, 2023					
Activity/Item	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023
Number of Man hours of training/presentation delivered to Public Bodies	0	0	152	76	264
Number of monthly Construction Unit meetings held	6	5	12	7	9
Number of training programmes attended by the Construction Unit	4	2	4	7	9
Number of Construction Projects monitored	533	332	536	601	662
Number of Tender Openings attended	8	25	6	4	0
Number of Site meetings attended	271	115	57	99	113
Number of site visits attended	218	208	216	311	272
Number of Final Completion Reports	0	0	0	0	113
Number of Practical Completion inspections attended	69	14	3	19	9
Cumulative Value of Construction Contracts monitored, awarded in Jamaican Dollar (J\$)	J\$26.94 B	J\$42.98 B	J\$89.65 B	J\$99.74 B	J\$91.68 B
Cumulative Value of Construction Contracts monitored, awarded in United States Dollar (US\$)	US\$185.20 M	US\$180.22 M	US\$518.72 M	US\$808.30 M	US\$620.20 M
Total distance travelled by Inspectors	-	-	58,194 Km	67,537 Km	90, 689 Km



Number of Projects Monitored



Value of project monitored.



Value of projects monitored.

Annual Contracts Cost Overruns and Variations Report (ACCOVR)

The Director of Investigation introduced a new initiative in April 2021, requiring Public Bodies to submit their ACCOVR Reports via an electronic platform which is linked to the Quarterly Contracts Awards (QCA) for efficiency and ease of reporting. This new system, which is now in place, allows Public Bodies to transfer voluminous data from the QCA electronic portal to the CCOV reporting spread sheet, thereby eliminating duplication of effort. This system replaced the previous manual system of reporting.

The GOJ Handbook of Public Procurement Procedures defines a Cost Overrun as “...an increase in the contract sum resulting from escalation in the price of labour and/or material.”, while a Variation is defined as “...a change to the deliverable(s) under a contract caused by an increase or decrease in the scope of work to be performed, amount/type of goods to be supplied or services to be provided, and must be directly related to the specific contract.”

For example, pre-contract activities, if not executed efficiently by the MDAs, may lead to contract variations in the following circumstances:

1. Late commencement of procurement process;
2. Use of incorrect procurement process/documents;
3. Selection of unsuitable bidder; and
4. Utilization of incorrect tender methodology.

The list is not closed.

ACCOVR Data

Please note that the following figures represent the raw data received from the Public Bodies as at June 2, 2023.

INTEGRITY COMMISSION

After the close of the 2022-2023 financial year, the Director of Investigation requisitioned one hundred and ninety-one (191) Public Bodies, of which sixty-three (63) Public Bodies, or 33.50%, indicated that there were no cost overruns or variations encountered for the relevant financial period.

The information requested was relevant to all projects of value greater than J\$500,000.00, for which monetary disbursements for Cost Overruns, Variations, and/or Any Other Price Adjustments were made during the financial period 2022-2023. In this regard, the ACCOVR data which was submitted by the Public Bodies indicated that the combined goods, works and services contracts valued approximately J\$320.81 billion. The values of cost overruns, variations and any other price adjustments for the financial period were approximately J\$302.12 million, J\$1.83 billion, J\$923.94 million respectively.

The Integrity Commission achieved a compliance rate of 81.2% for the 2022-2023 financial period.

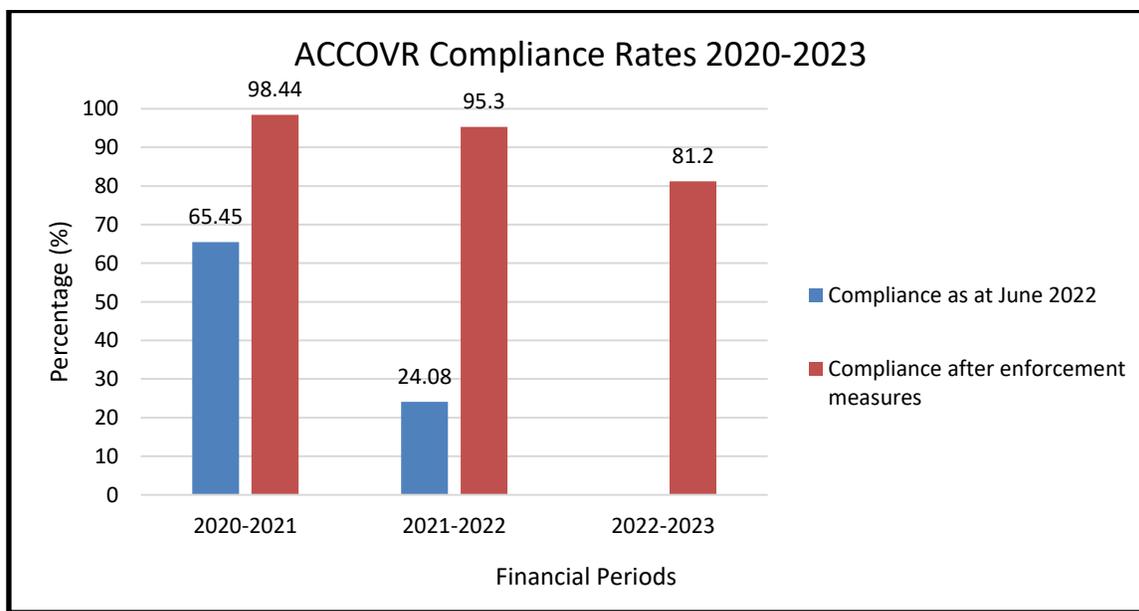
Update re ACCOVR for Financial Years 2020-2021 and 2021-2022

As at June 2, 2023, the Integrity Commission achieved a compliance rate of 98.44% (189 responsive Public Bodies) for the 2020-2021 financial period, and a rate of 95.30% (182 responsive Public Bodies) for the 2021-2022 financial period.

It is to be noted that the compliance rates of the submission of ACCOVRs for both 2020-2021 and 2021-2022 financial periods were achieved following an initiative by the Director of Investigation which involved multiple efforts via telephone calls, requisitions, reminders and summonses over the past 2 years, while for the 2022-2023 period, efforts were made up to June 2, 2023.

See compliance chart below making comparison of the ACCOVR compliance rates between 2020-2022 achieved as at June 2022, and the compliance rate for periods 2020-2023 after the Directors' initiative for respective periods:

ACCOVR Compliance Rates 2020-2023



ACCOVR Compliance Rate.

INTEGRITY COMMISSION

The data analysis below is representative of the electronic submissions received for the relevant financial period. The results of the submissions are as follows:

Contracts Cost Overruns, Variations and Any Other Price Adjustments (AOPA) for Financial Period 2022-2023

Type of Contract	Total Contract Value (J\$)	Total Value Cost Overrun (J\$)	Total Value Variation (J\$)	Total Value Any Other Price Adj. (J\$)	% Cost Overrun	% Variation	% Any Other Price Adjustment (AOPA)
Goods	237.22B	134.73M	717.66M	36.11M	0.06	0.30	0.02
Works	46.02B	26.58M	586.87M	843.35M	0.06	1.28	1.83
Services	37.57B	140.81M	524.08M	44.48M	0.37	1.39	0.12
Goods/Works/Services	320.81B	302.12M	1.83B	923.94M	0.09	0.57	0.29

Goods contracts account for the highest value of contracts awarded, being approximately J\$237.22B or 73.94%, while Works was J\$46.02B or 14.35% and Services was J\$37.57B or 11.71%. The procurement of Services accounted for the highest percentage of cost overruns, that is, 0.37% followed by Works and Goods with 0.06% each. Services contracts had the highest variations, with approximately 1.39%, followed by Works then Goods with 1.28% and 0.30% respectively. Works contracts had the highest percentage of price adjustments with approximately 1.83%, followed by Services, and Goods with approximately 0.12% and 0.02% respectively.

Annual Contract Cost Overruns and Variations for Goods, Works and Services exceeding J\$5million

The ACCOV data for the procurement of goods, works and services exceeding J\$5million was reviewed and tabulated for the relevant financial period. The tables below indicate that the total variations were significantly higher than that of the total cost of overruns or any other price adjustments in most cases.

Of all categories of contracts valued \$60M and above, the variation sum of \$510.86million for Goods Contracts was approximately 29.76% above the Works contracts and 94.19% above the Services contracts.

For contracts valued \$60M and above, the total cost of overruns of \$116.39million for Goods Contracts was approximately 78.9% above the Works contracts and 31.33% above the Services contracts.

For contracts within the \$60M and above threshold, the total value of works contracts in the 'any other price adjustments' category was \$789.10 million when compared to goods and services contracts which accounted for \$8.41 million, and \$8.59 million, respectively. Note, the total variance of the referenced works contracts represented an average of 99% above goods and services contracts in that category ('any other price adjustments').

INTEGRITY COMMISSION

For the 2022-2023 financial year, contracts valued between \$5M and \$30M for Services was approximately 15.94% above the Goods contracts and 30.11% above Works contracts. Works contracts between \$30M and \$60M did not incur any overruns for the period.

Annual Contract Cost Overruns and Variations for Goods, Works and Services exceeding J\$5million for Financial Period 2022-2023

	Goods			Works			Services		
Procurement Thresholds	J\$5M to J\$30M	J\$30M to J\$60M	\$60M and above	J\$5M to J\$30M	J\$30M to J\$60M	J\$60M and above	J\$5M to J\$30M	J\$30M to J\$60M	J\$60M and above
Total Contract Value	10.45B	4.45B	212.17B	8.69B	2.74B	30.76B	12.43B	2.79B	12.89B
Cost Overrun	7.06M	809.58K	116.39M	1.14M	0	24.54M	45.00M	2.61M	79.91M
Variation	32.39M	463.79K	510.86M	58.61M	83.28M	358.81M	314.19M	74.92M	29.66M
AOPA	18.13M	7.45M	8.41M	49.11M	1.91M	789.10M	23.14M	1.98M	8.59M

Comparison of Annual Contract Cost Overruns and Variations for Public Bodies with Goods Contracts over \$100 Million

The Goods CCOV was selected for analysis for the financial period 2022-2023 as it was observed that it represented 73.94% of the number of contracts awarded. Please refer to table overleaf.

INTEGRITY COMMISSION

Annual Contract Cost Overruns and Variations for Public Bodies with Goods Contracts over \$100M (2022-2023)

Public Bodies	Total Contract Value (J\$)	Total Value Cost Overrun (J\$)	Total Value Variation (J\$)	Total Value Any Other Price Adj. (J\$)	% Cost Overrun	% Variation	% Any Other Price Adjustment
Bank of Jamaica	836.18M	0	0	0	0	0	0
Betting, Gaming and Lotteries Commission	523.38M	0	0	0	0	0	0
eGov Jamaica Limited	490.25M	0	0	0	0	0	0
Jamaica Civil Aviation Authority	146.36M	0	0	0	0	0	0
Jamaica Urban Transit Company (JUTC)	688.18M	0	0	0	0	0	0
Ministry of Finance and the Public Service	470.55M	0	0	0	0	0	0
Ministry of Health	615.94M	0	0	0	0	0	0
Ministry of National Security	1.07B	0	0	0	0	0	0
Ministry of Transport and Mining	1.06M	0	0	0	0	0	0
National Health Fund	4.51B	116.39M	460.78M	0	2.58	10.22	0
National Solid Waste Management Authority	2.13B	0	0	0	0	0	0
National Water Commission	1.12B	0	0	0	0	0	0
Petrojam Limited	195.18B	0	0	0	0	0	0
Port Authority of Jamaica	246.14M	0	0	0	0	0	0

INTEGRITY COMMISSION

Comparison of Annual Contract Cost Overruns and Variations for Public Bodies with Works Contracts over \$100 Million

The Works CCOV was selected for analysis for the financial period 2022-2023 as it was observed that while it represented 14.35% of the contracts awarded, the individual contracts are typically significant in value and of national significance. Please see table below.

Annual Contract Cost Overruns and Variations for Public Bodies with Works Contracts over \$100M (2022-2023)

Public Bodies	Total Contract Value (J\$)	Total Value Cost Overrun (J\$)	Total Value Variation (J\$)	Total Value Any Other Price Adj. (J\$)	% Cost Overrun	% Variation	% Any Other Price Adjustment (AOPA)
Accountant General Department	359.42M	0	106.17M	0	0	29.54	0
Bank of Jamaica	336.47M	0	0	0	0	0	0
CHASE Fund	131.52M	0	1.82M	0	0	1.38	0
Housing Agency of Jamaica Ltd.	1.76B	0	8.75M	0	0	0.50	0
Jamaica Social Investment Fund	1.49B	0	52.36M	0	0	3.52	0
Ministry of National Security	1.12B	0	11.32M	0	0	1.02	0
National Housing Trust	19.22B	2.46M	0	621.89M	0.01	0	3.24
National Water Commission	1.16B	0	0	121.13M	0	0	10.45
National Works Agency	308.82M	0	-950.00	0	0	0	0
Petrojam Limited	2.44B	0	85.66M	16.33M	0	3.52	0.67
Urban Development Corporation (UDC)	813.19M	18.27M	55.39M	0	2.25	6.81	0

INTEGRITY COMMISSION

Annual Contract Cost Overruns and Variations for Public Bodies with Services Contracts over \$100 Million

The Services CCOV was also analysed for the financial period 2022-2023, representing 11.71% of the contracts awarded. Please see table below.

**Annual Contract Cost Overruns and Variations for Public Bodies with Services Contracts over \$100M
(2022-2023)**

Public Bodies	Total Contract Value (J\$)	Total Value Cost Overrun (J\$)	Total Value Variation (J\$)	Total Value Any Other Price Adj. (J\$)	% Cost Overrun	% Variation	% Any Other Price Adjustment
Bank of Jamaica	1.17B	0	0	0	0	0	0
Development Bank of Jamaica	177.29M	0	0	0	0	0	0
Electoral Office of Jamaica	197.37M	0	0	0	0	0	0
HEART/NSTA Trust	2.04B	79.91M	34.34M	0	3.91	1.68	0
Jamaica Civil Aviation Authority	438.15M	0	0	0	0	0	0
Jamaica Urban Transit Company (JUTC)	393.12M	0	0	0	0	0	0
Ministry of Finance and the Public Service	2.22B	0	0	0	0	0	0
National Health Fund	1.11B	0	-55.29M	4.35M	0	-5.00	0.39
National Housing Trust	1.33B	0	25.34M	4.24M	0	1.90	0.32
National Irrigation Commission Limited	693.75M	0	0	0	0	0	0
National Solid Waste Management Authority	355.13M	0	0	0	0	0	0

INTEGRITY COMMISSION

Public Bodies	Total Contract Value (J\$)	Total Value Cost Overrun (J\$)	Total Value Variation (J\$)	Total Value Any Other Price Adj. (J\$)	% Cost Overrun	% Variation	% Any Other Price Adjustment
National Water Commission	1.00B	0	0	0	0	0	0
Port Authority of Jamaica	242.19M	0	0	0	0	0	0
Western Regional Health Authority	105.23M	0	0	0	0	0	0

CONTRACTS MONITORING UNIT

Monitoring of Non-Construction Contracts

The Non-Construction Contracts Inspectorate (NCCI), pursuant to Section 33 of the Integrity Commission Act, monitors the award, implementation and termination of Goods and Services Contracts. During the course of the NCCI's monitoring activities, Inspectors are expected to attend, where required, Tender Opening Ceremonies and procurement-related meetings as well as to conduct verifications of procured items.

The NCCI is further tasked with the management/monitoring of several critical portfolios and where required, provides guidance to Public Bodies, with respect to the procurement process.

The Unit monitored six hundred twenty-eight (628) procurement opportunities/contracts during the period April 1, 2022 to March 31, 2023. The estimated value of the contracts monitored, which were at varying stages of the procurement process, was approximately Thirty-Four Billion Dollars.

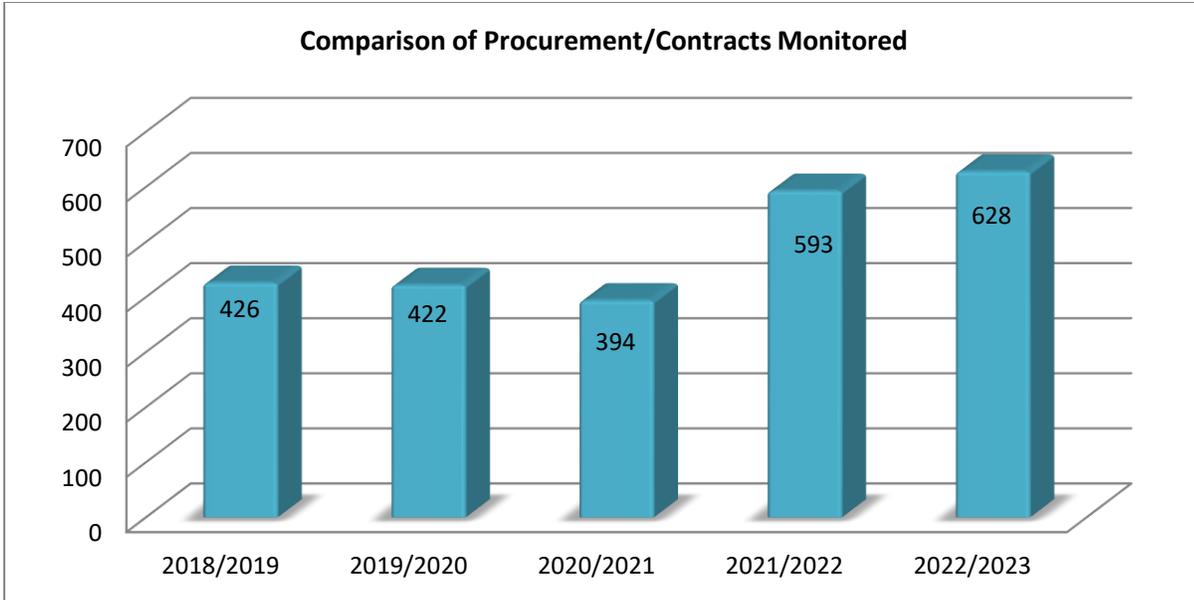


Figure 9: Comparison of procurement/contracts monitored.

Forty five percent (45%) of the contracts monitored by the Unit were service-related, such as security services, janitorial services and maintenance contracts. The Unit monitored one hundred fourteen (114) 'goods' type contracts, which were comprised of, among other things, procurement of furniture, motor vehicles, information and communications technologies (ICT) equipment.

Consultancy type contracts represented twenty-three percent (23%) of the projects monitored, and included consultancies related to the provision of construction-related services and Information Technology solutions.

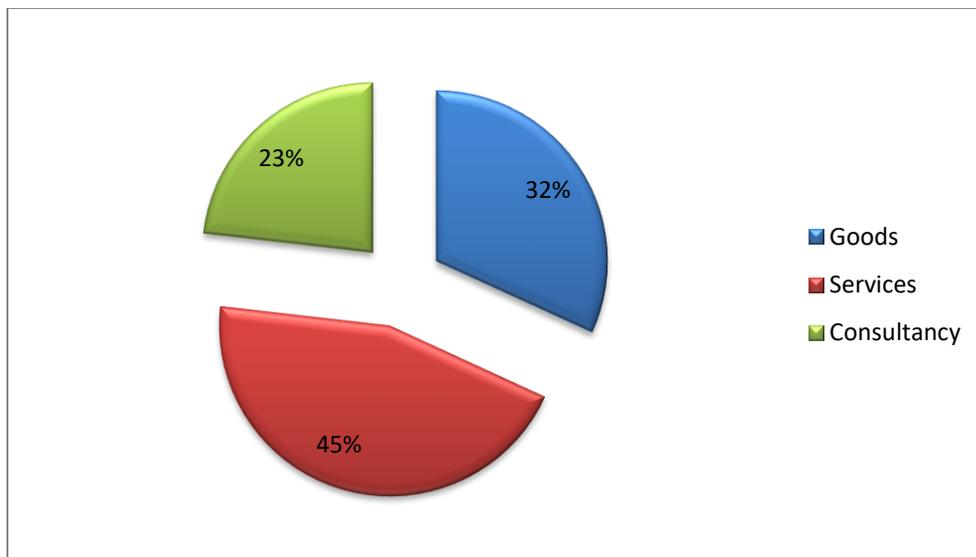


Figure 10. Types of Projects Monitored by the Non-Construction Unit.

INTEGRITY COMMISSION

During the period, Inspectors within this sub-unit were assigned 105 new procurement opportunities for monitoring. The remaining Three Hundred Eighty-Eight (388) projects were carried forward from previous years. One Hundred and Thirty-Five (135) of the projects which were being monitored either concluded or were aborted during the year.

Reports Completed July 1, 2020 to March 31, 2023			
	2020/2021	2021/2022	2022/2023
Final Monitoring Reports	n/a	51	133
Thematic Reports	2	0	0
Tender Opening Reports	6	10	8
Site Visit/Meeting Reports	2	15	7
Verification Reports	20	12	19
PPC Portfolio Report	n/a	n/a	17

During the latter part of the reporting period, the sub-unit extended its monitoring activities through the initiation of a new process aimed at gathering information regarding the use of Single Source and Restricted Bidding Methodologies (non-competitive/lesser competitive methodologies). Twenty-six public bodies were included in the pilot and these public bodies were asked to provide the Director of Investigation with information already found in their procurement plans for the Financial Year 2023/2024. The aim of this initiative is to provide greater oversight in our monitoring activities by paying specific attention to procurement opportunities that are not otherwise advertised to the general public through the print media.

Quarterly Contract Awards Reports (QCAR)

The Director of Investigation, in keeping with the provisions of Section 51 of the Integrity Commission Act, requires Procuring Entities, on a quarterly basis, to provide the particulars of contracts awarded above Five Hundred Thousand Dollars (J\$500,000.00), within one (1) calendar month following the ending of the quarter to which they relate. Approximately one hundred and ninety-three (193) Public Bodies were requisitioned to prepare and submit Quarterly Contract Awards (QCA) Report to the Commission.

For the period April 01, 2022 to March 31, 2023, the Commission recorded an average compliance rate of 100%.

Contract Award Data

The Commission's web portal recorded a total of 26,243 contracts awarded for the period of April 01, 2022 through to March 31, 2023.

The total value of contracts awarded for the period was J\$ 345,538,462,055.33. The value of contracts for Goods and Services inclusive of Consulting and Insurance Placement Services was \$ 321,225,065,187.41 while the value of Works contracts was \$ 24,313,396,867.92

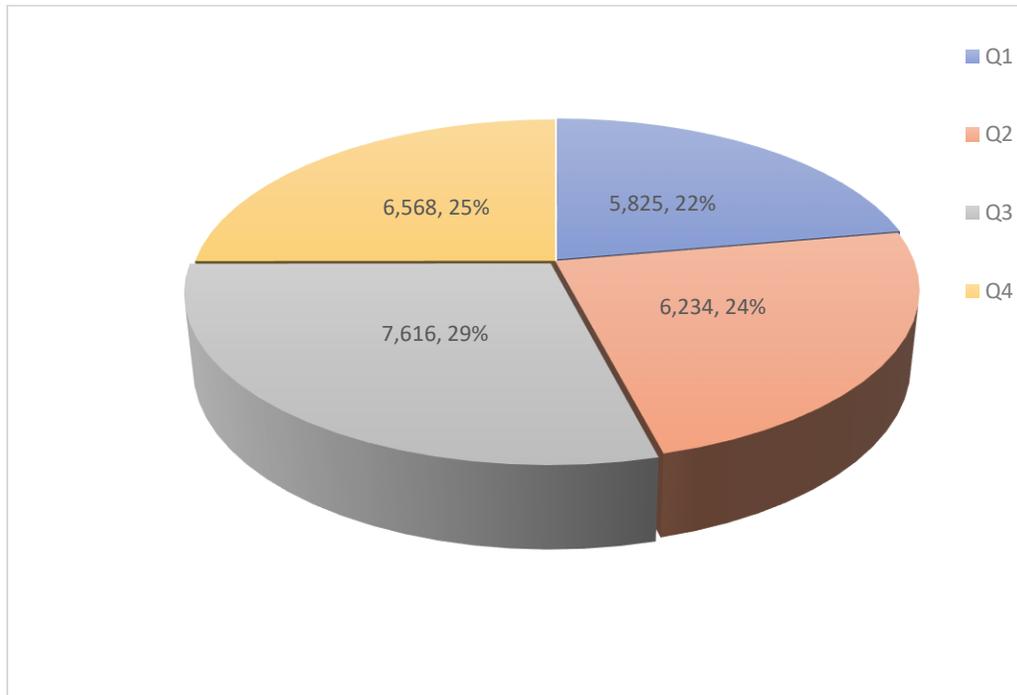
INTEGRITY COMMISSION

Summaries of the information collated are represented below:

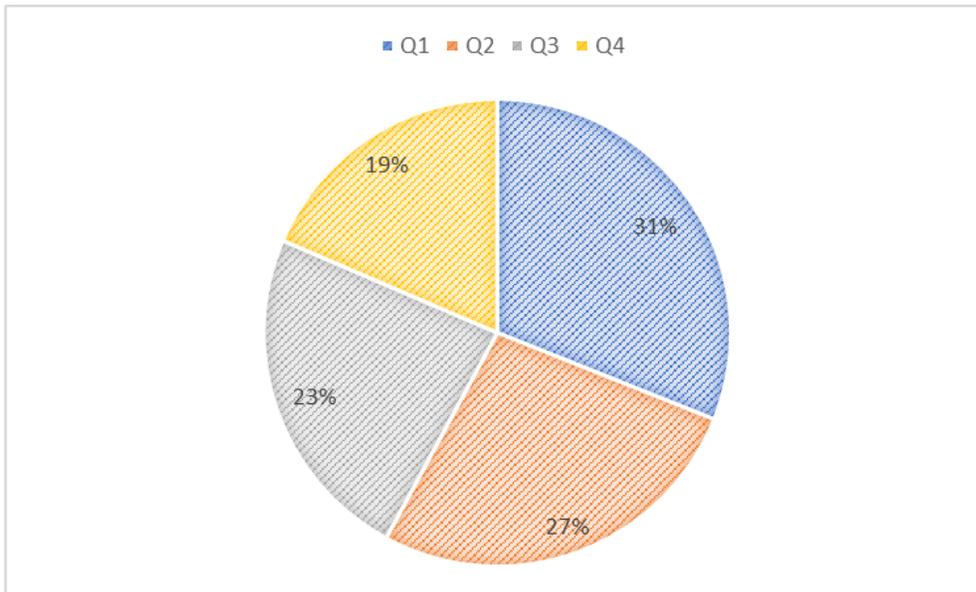
Summary of Contracts Awarded

Quarter	Total # of Contracts Awarded	Total value Goods Contracts	Total Value of Service Contracts	Value of Works Contracts	Total Value of Contracts
Q1	5,825	\$91,821,913,438.87	\$8,889,077,311.55	\$6,581,270,888.99	\$107,292,261,639.41
Q2	6,234	\$77,717,752,434.42	8,813,322,780.63	6,276,051,458.23	\$92,807,126,673.28
Q3	7,616	\$63,755,310,380.40	\$11,155,727,044.23	\$6,435,487,020.38	\$81,346,524,445.01
Q4	6,568	\$50,598,504,521.52	\$8,473,457,275.79	\$5,020,587,500.32	\$64,092,549,297.63
Total	<u>26,243</u>	<u>283,893,480,775.21</u>	<u>37,331,584,412.20</u>	<u>24,313,396,867.92</u>	<u>345,538,462,055.33</u>

Total number of Contracts Awarded per Quarter

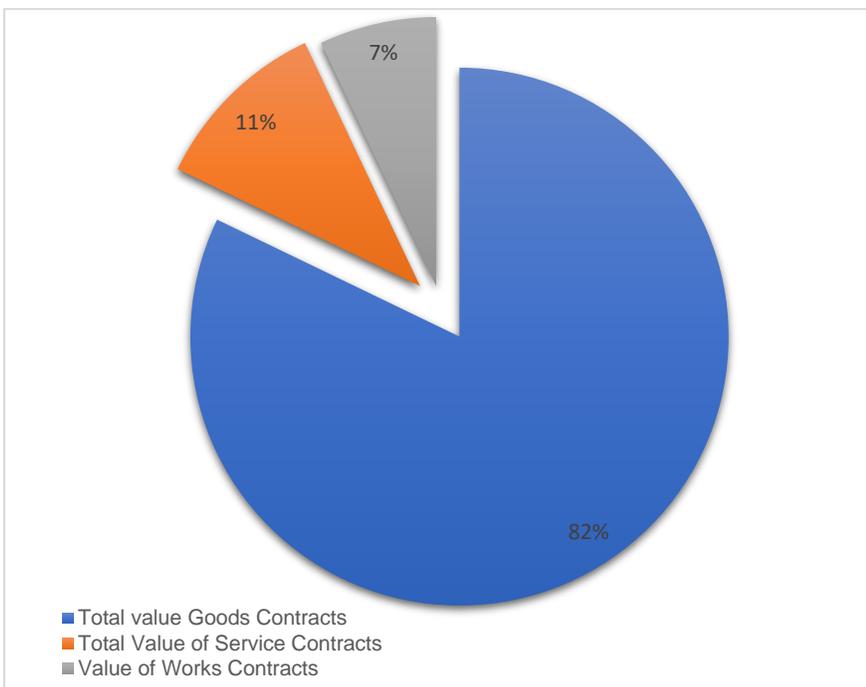


Total Value of Contracts Awarded per Quarter



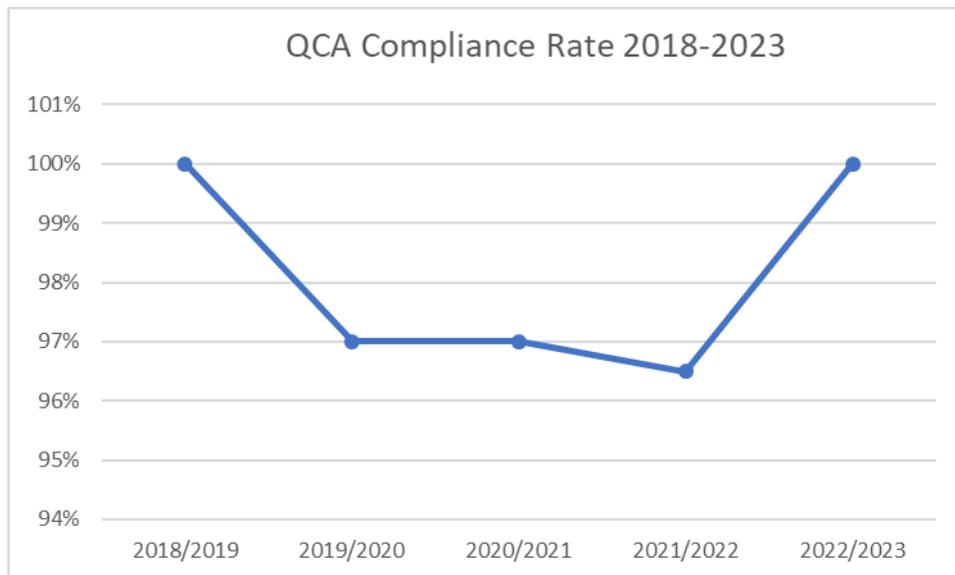
The majority of the contracts awarded during the financial year 2022/2023 were awarded during the third quarter (Q3), that is, the period between October and December 2022, and the least number of contracts awarded during the first quarter (Q1), or the period between April through June 2022. However, the total value of contracts awarded during the first quarter (Q1), accounted for majority of the overall expenditure, that is, 31% or \$107,292,261,639.41 of the total spend.

Value of Goods, Works and Services Contracts Awarded as a Percentage of Overall Contract Value



INTEGRITY COMMISSION

The aggregate amount spent on goods by procuring entities exceeded the value of works undertaken and the value of services acquired, combined. The value of goods contracts awarded accounted for 82% of the total value of contracts awarded or \$283,893,480,775.21 of the total procurement expenditure for the financial year 2022/2023. Services acquired accounted for 11% or \$37,331,584,412.20 of total procurement expenditure while infrastructural works accounted for 7% or \$24,313,396,867.92 of the total procurement expenditure.



The QCAR portfolio has managed to regain a compliance rate of 100%. Prior to the financial year under review, the Commission fought to maintain a perfect compliance rate. Same was not achieved owing to varying reasons, chief among them being setbacks experienced during the onset and tenure of the COVID-19 pandemic. Nevertheless, the Commission has employed measures to ensure full compliance for this and future reporting periods.

PARLIAMENTARY EXEMPTIONS

The Section 41 of the Constitution of Jamaica, provides, inter alia, that save for such circumstances in which an exemption is granted by the House of Parliament to a Member of Parliament, the seat of a Member of either house shall become vacant, if (a) the Member becomes a party to any contract with the Government of Jamaica, (b) the Member is a partner in a firm or a director or manager of a company which becomes a party to such a contract, or (c) the member becomes a partner in a firm or director or manager of a company which is itself a party to such a contract.

The Integrity Commission, in its continued effort of securing greater transparency and probity in the award and implementation of all Government contracts to Parliamentarians, requested from the Clerk of the Houses of Parliament information on the Exempted Motions which were moved and approved in respect of Parliamentarians during the financial year 2022/2023.

The following represents the three (3) Exemption Motions which were granted as advised by the Clerk of the Houses of Parliament:

INTEGRITY COMMISSION

1. Member of Parliament for St. Catherine, South Eastern, Mr. Robert Miller, March 28, 2023:

The exemption which was granted in respect of Mr. Robert Miller, on March 28, 2023, recognized that the Member of Parliament for St. Catherine, South Eastern, is a Business Development Officer with Shoreline Foundation Inc., and may from time to time enter into contracts with the Government of Jamaica and its Agencies.

2. Member of Parliament for St. Andrew, Western, Mr. Anthony Hylton, February 02, 2023:

The exemption which was granted in respect of Mr. Anthony Hylton, on February 02, 2023, recognized that the Member of Parliament for St. Andrew, Western is an Attorney-at-Law and is a partner in the law firm, Samuda & Johnson, Attorneys-at-Law, and may from time to time enter into contracts with the Government of Jamaica and its Agencies.

3. Senator, Dr. Saphire Longmore, June 24, 2022:

The exemption which was granted in respect of Dr. Saphire Longmore, on June 24, 2022, recognized that the Senator is a Consultant Psychiatrist, who may from time to time enter into contracts with the Government of Jamaica and its Agencies.

The Senator has also disclosed her interest in being contracted by the Ministry of Health and Wellness as a Consultant to coordinate a mental health programme for the people of Jamaica.

AREAS OF IMPACT

The Division's monitoring arm as part of its activities makes several recommendations to public bodies with a view to preventing breaches of the Public Procurement Act and attendant Regulations as well as other applicable guidelines. The recommendations made during the reporting period may be found at **Appendices 2 and 3**.

INTEGRITY COMMISSION

Licence And Asset Divestment/Acquisition Unit

The Licence and Asset Divestment /Acquisition (LADA) Unit, established in July 2020, monitors the grant, revocation and suspension of prescribed licences, the divestment/acquisition of land and other assets inclusive of those divested/acquired *via* Public Private Partnerships

The LADA Unit is comprised of one (1) Manager, one (1) Senior Inspector and three (3) Inspectors. There are two vacancies within the Unit namely Senior Inspector and Inspector.

The table below provides a summary of the activities undertaken by the LADA Unit within the Financial Year 2022/2023:

Summary of Activities undertaken by the LADA Unit – Financial Year 2022/2023

Licence and Permits Monitoring Activity April 1, 2022 - March 31, 2023						
Activity	Licence	Land	Asset Divestment	Procurement Contracts	Acquisition	Public Private Partnership
Number of Projects Monitored	206	157	18	-	1	7
Complaints received	3	-	-	-	-	-
Enquiries Management	3	3	-	5 ¹²	-	-
Number of Tender Opening attended	0	6	-	-	-	-
Number of Site Visits	-	11	4	-	-	-
Number of Land Divestment Policy Framework Meetings Monitored	N/A	0 ¹³	N/A	-	N/A	N/A
Number of Land Divestments Advisory Committee (LADC) Meetings monitored	N/A	10	N/A	-	N/A	N/A
Number of SCJ Holdings Limited Land Divestment Committee Meetings monitored	N/A	5	N/A	-	N/A	N/A
Number of Meetings held with Public Bodies	6					1

¹² Five Procurement related enquiries are ongoing

¹³ No Meetings held during the Financial Year

INTEGRITY COMMISSION

The Unit is currently finalizing the development phase of its Land and Asset Divestment/Acquisition database and has successfully completed the development of its Prescribed Licences database. These are the two major online monitoring database platforms employed by the Unit. The Prescribed Licences Database facilitates the systematic collection of licences awarded / revoked / suspended on a quarterly basis and was implemented on a phase basis. Ten (10) Public Bodies were selected to participate in Phase 1.

The Unit is currently assessing the lessons learnt in Phase 1 and on completion it is anticipated that a full launch of the system will be undertaken in the new financial year.

To facilitate the launch of Phase 1 of the Prescribed Licences Database, training sessions were held in October and November 2022 with the selected participants. Consultative meetings were also held. Participants were required to submit reports for the fourth quarter (October - December 2022) on or before February 28, 2023.

The development of a comprehensive software program for the recording and monitoring of Land and Asset Divestments/Acquisitions including Public Private Partnerships undertaken by the Government of Jamaica is slated to be completed and launched in the next financial year.

The Asset Divestment/Acquisition and Public Private Partnership database will allow for the recording and monitoring of the divestment/acquisition of all Lands (both Crown Lands and other Government owned-lands). The system will also facilitate the bi-annual submission of Public Private Partnership contracts entered into by the Government of Jamaica.

Monitoring of Committees

During the year under review, the Unit continued to monitor the activities of the following Committees remotely:

1. SCJ Holdings Limited Land Divestment Monitoring Committee;
2. Technical Review Committee – NRCA and NEPA; and
3. Land Divestment Advisory Committee (LDAC).

Prescribed Licences And Permits

During the year, the Unit commenced the monitoring of the grant of nine (9) new licences bringing the total number of licences actively monitored for the period to Two Hundred and Six (206). Licences were monitored across the following sectors:

INTEGRITY COMMISSION

Licences monitored within varied Sectors

Sector	No Monitored
Telecommunication and Spectrum	21
Air Service	22
Water Abstraction and Well Drilling	84
Mining	17
Transportation	1
Spirit Licences	1
Game Bird Shooting	1
Removal of “Limited” – Charitable Organizations	47
Utilities - Sewerage	2
Importation	1
Environmental Permit	3
Extraction of Timber	1
Fishing/Vessel Licences	5
Total	206

In undertaking our monitoring function, a review of the existing internal policies and procedures of each licensing authority including the relevant legislation is undertaken to ascertain whether licences were issued/revoked or varied in compliance with the applicable legislation and governing policies.

Land Divestment

The LADA Unit continued its monitoring of the divestment of Government-owned lands for the reporting period in accordance with the Policy Framework and Procedures Manual for the Divestment of Government-Owned Lands, 2015.

One Hundred and Fifty-Seven (157) GOJ land divestment processes were monitored by the Unit, inclusive of a number of divestments that were previously being monitored but were re-advertised. The Unit commenced the monitoring of twenty-eight (28) new divestment opportunities during the period under review. Notwithstanding, several divestment opportunities still await re-advertisement due to lack of offers or lack of responsive offers.

The Land Divestment Advisory Committee (LDAC)

The Land Divestment Advisory Committee (LDAC) is tasked with the responsibility for evaluating applications from the Commissioner of Lands and making recommendations to the Minister with responsibility for Crown Lands. The Committee plays only an advisory role to the Minister in respect of the divestment of government-owned lands and the members of this Committee are appointed by the Minister for a period of three (3) years. During the reporting period the Unit remotely monitored Ten (10) meetings held by the referenced Committee. During its monitoring activities ninety-eight (98) submissions and Minutes of meetings were reviewed. The submissions related to the sale, lease and regularization of lands and included land divestment projects previously assigned for monitoring in the Unit.

During the period April 1, 2022 to March 31, 2023, the LDAC reported that it recommended eighty-two (82) applications at an estimated revenue of \$394,733,000.00 for Ministerial approval. Sixty-four (64) of those submissions with an estimated revenue of \$228,925,000.00 being approved by the Minister to date.

Applications Recommended for Lease by Land Use and Value for the 2022 – 2023 Financial Year

Land Use	No. of Applications	Value (\$)
Agricultural	4	574,000.00
Residential & Agricultural	4	2,557,000.00
Commercial/Industrial	9	5,484,000.00
Institutional	12	4,340,000.00
*other	5	1,847,000.00
Total	34	14,802,000.00

*Resort, recreational, community development and easement

INTEGRITY COMMISSION

Applications Recommended for Sale by Land Use and Value for the 2022– 2023 Financial Year

Land Use	No. of Applications	Value (\$)
Residential	12	43,863,000.00
Agricultural	4	9,090,000.00
Residential & Agricultural	10	27,860,000.00
Commercial/Industrial	7	133,300,000.00
Institutional	1	18,000,000.00
*other	6	146,313,000.00
Total	40	378,426,000.00

*Resort, recreational, community development and easement

Applications Recommended for Licence by Land Use and Value for the 2022 – 2023 Financial Year

Land Use	No. of Applications	Value (\$)
Commercial/Industrial	1	850,000.00
*other	1	355,000.00
Total	2	1,205,000.00

* Resort and recreational

SCJ Holding Limited Land Divestment and Monitoring Committee Meeting

The SCJ Holdings Limited (SCJH) is wholly owned by the Government of Jamaica and manages sugar lands owned by the Government of Jamaica. The SCJH is tasked with putting its land assets to use by attracting investors in areas such as mining, housing and agriculture. Proposals received by the company are submitted to its Land Divestment and Monitoring Committee for review and approval and further referral to the full Board of Directors.

The LADA Unit remotely monitored the proceedings of the six (6) Land Divestment and Monitoring Committee meeting during the reporting period. A total of thirty-four (34) submissions were reviewed from which three (3) submissions were assigned for sustained monitoring. Submissions to the Committee related to the sale and lease of lands.

The Land Divestment and Monitoring Committee reported that it considered 39 submissions, which included applications for lease, options to lease, application for licence and application to purchase land. Six (6) of the lease application pertained to the relocation of farmers within the Bernard Lodge Master Plan. Thirty-eight (38) of those applications were recommended to the Board of Directors and were approved.

INTEGRITY COMMISSION

Technical Review Committee Meeting

The Technical Review Committee (TRC) is a Sub-Committee of the National Resources Conservation Authority/Town and Country Planning Authority (NRCA/TCPA) which considers various types of applications and makes recommendations to the Authorities.

During the reporting period, the TRC deliberated on applications relating to major developments from a variety of sectors, categories and types to include major road construction/rehabilitation, infrastructural and telecommunication, subdivision and housing, hotel and resort development, mining and quarrying, office/commercial and mixed use development, residential multi-family developments, coastal development in addition to applications that went through the strictures of the Environmental Impact assessment process, which involved mandatory public consultation.

The Unit remotely monitored the proceedings of the eleven (11) TRC meetings during the reporting period. A total of Three-Hundred and Twenty-Four (324) submissions were reviewed.

The Technical Review Committee reported the total numbers of submissions deliberated upon by the committee for the financial year April 1, 2022 – March 31, 2023 as illustrated in the table below:

Total applications deliberated on by the Committee

Item	Description	Total Number
1	Total applications deliberated	578
2	New	418
3	Resubmission -Amendments -Renewals	53 99
4	Total applications recommended for approval	570
5	Total applications recommended for refusal	8

Evaluation and Review of The Policy Framework and Procedures Manual for The Divestment of Government-Owned Lands 2015.

The activities of the Land Divestment Policy Framework Committee were placed on hold during the year under review.

The Committee was established to review the Policy Framework and Procedures Manual for the Divestment of Government-owned Lands (2015) which aims to harmonize the various mechanisms and procedures of public sector entities which are custodians of government lands. The main goal of the Policy Manual is to foster *“increased transparency and efficiency in the process by which government-owned lands are divested by all public sector entities”*. The Policy Manual was developed particularly for the Divestment of Crown Lands; however, Agencies involved in the divestment of other Government-owned lands are required to adopt the Policy to *“ensure standardization and harmonization of land divestment policies and practices among all government entities involved in divestment.”*

It is recommended that these review meetings be reconvened to facilitate input from the various stakeholders given the importance of having a comprehensive standardized Policy Manual to guide Practitioners.

Enquiry Management

Pursuant to Section 47 of the Integrity Commission Act, the Director of Investigation initiated several enquiries based on allegations made in the public domain. During the period, enquiries were conducted into eleven (11) matters as follows:

Breakdown of Enquires based on Portfolio

No.	Portfolio	No. of Enquiries
1	Land	3
2	Licence	3
3	Asset	0
4	Procurement	5
	Total	11

Up to March 31, 2023, the above-mentioned matters were ongoing. On review, four (4) were transferred to the Contract, Procurement and Corruption Investigation Unit for investigation whilst the remaining seven (7) matters are at varying stages of the Enquiry Management Process.

Complaints Assigned to LADA Unit by The Director of Investigation

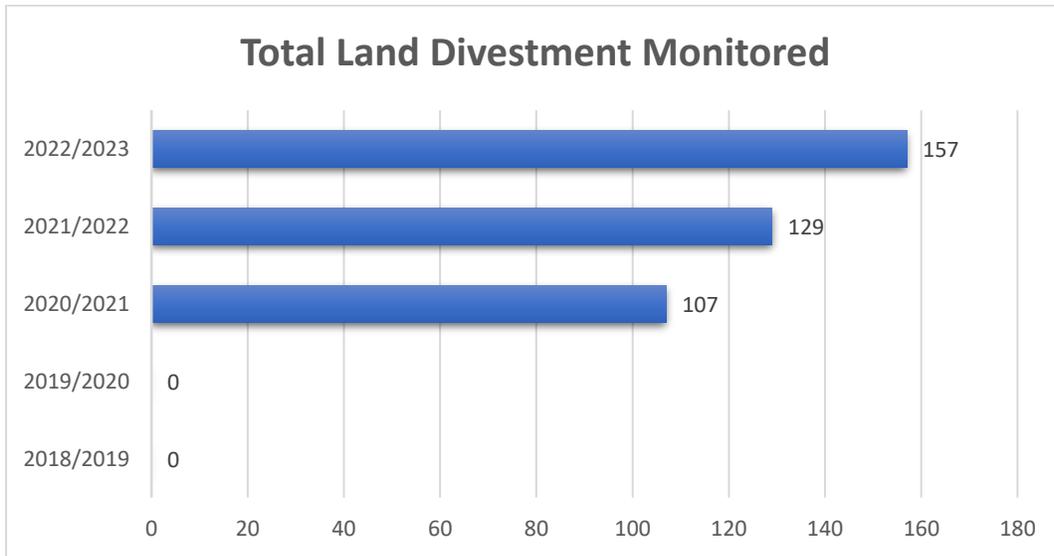
The Unit commenced the financial year with three (3) complaints which were assigned by the Director of Investigation. One Preliminary report was completed with no adverse findings against the Public Body involved whilst the remaining two were reviewed and have been escalated to investigation status. No new complaints were assigned during the period under review. Please see breakdown below:

Breakdown of Complaints Received

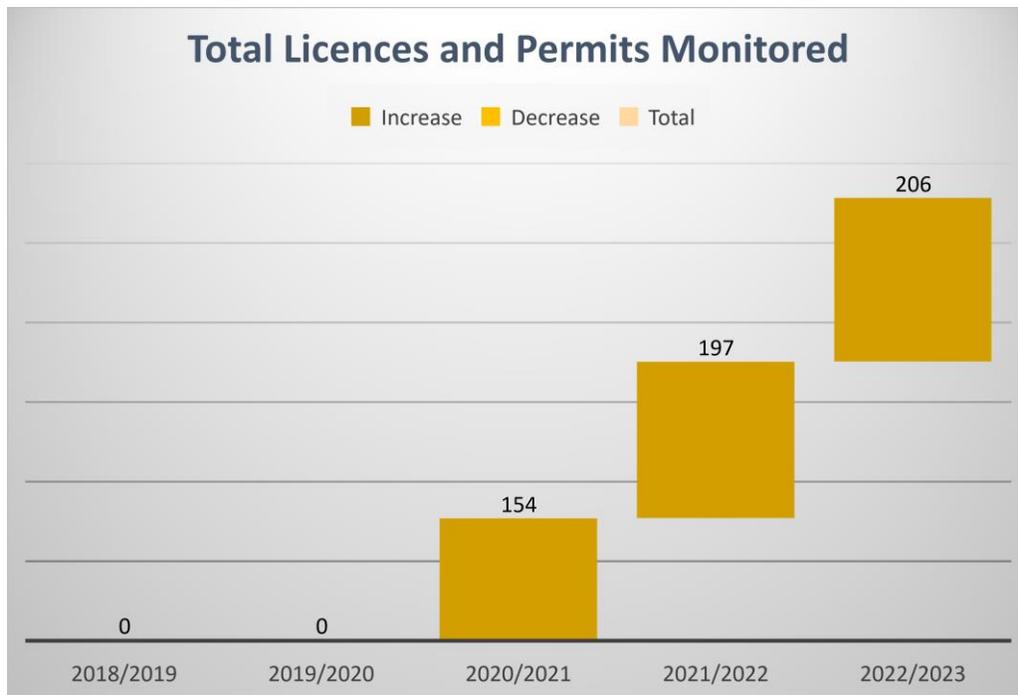
Portfolio	No. of Complaints	Breakdown of Complaints	Status
Prescribed Licences	1	Mining	Complete
	1	Building Permit	Transferred to CPCI
	1	Building Permit	In progress
Land	0		
Asset	0		
Total	3		

Five Year Analysis

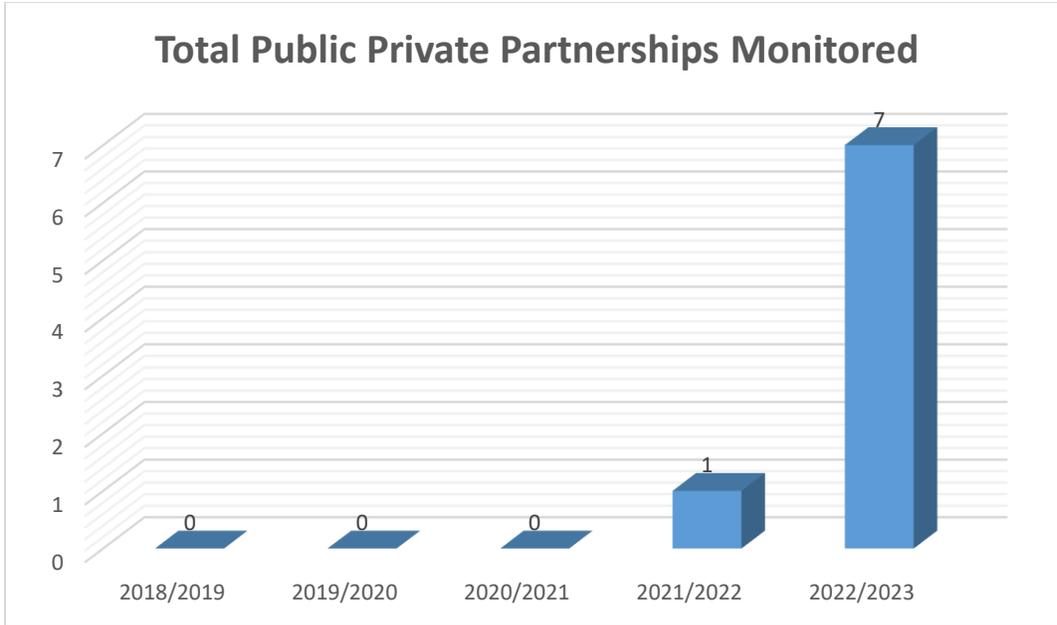
In February 2023 the Commission celebrated its fifth anniversary following its establishment in 2018. In 2020, the Commission, in keeping with the Integrity Commission Act, extended its portfolio to include the monitoring of Licence, Asset Divestment and Acquisition through the establishment of the LADA Unit. The monitoring activities of the Unit throughout the period July 2020 to March 31, 2023 is encapsulated in the charts below:



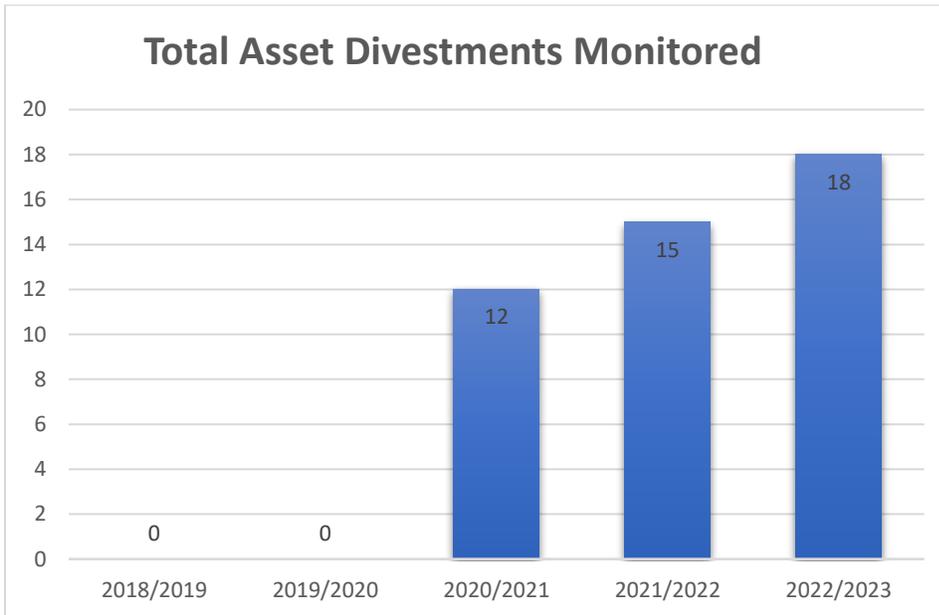
Total Land Divestments Monitored



Total Licences and Permits Monitored



Total Public Private Partnerships Monitored



Total Asset Divestments Monitored

INTEGRITY COMMISSION

Comparison of Reports Completed – July 1,2020 to March 31, 2023

Reports Completed July 1, 2020 to March 31, 2023						
Description	2018/2019	2019/2020	2020/ 2021	2021/ 2022	2022/ 2023	Total
Final Monitoring Reports	N/A	N/A	5	34	28	67
Termination Reports	N/A	N/A	1	2	11	14
Close Out (Ultra Vires Legacy Matters) Reports	N/A	N/A	10	10	0	20
Thematic Reports	N/A	N/A	0	1	1	2
Tender Opening Report	N/A	N/A	11	13	6	30
Site Visit Reports	N/A	N/A	1	7	15	23
Preliminary Investigation Reports	N/A	N/A	0	1	0	1
Enquiry Management Reports	N/A	N/A	7	2	0	9
Summary Reports (for transfer to CPCI)	N/A	N/A	0	1	3	4
Initial Investigation Reports	N/A	N/A	1	3	0	4
Total No. of Reports	N/A	N/A	36	74	64	174

Other Activities

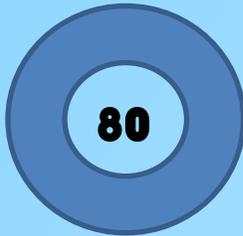
As part of the Integrity Commission’s Good Governance sensitization series, the Unit conducted three (3) presentations entitled “*The Integrity Commission’s Anti-Corruption Good Governance Sensitization Workshop Series -*” Presentations were made to members of the Jamaica Anti-Doping Commission, Ministry of Labour and Social Security and the Office of the Public Defender on July 2022, September 9, 2022 and February 28,2023, respectively.

Chapter 7 - Corruption Prosecution Division

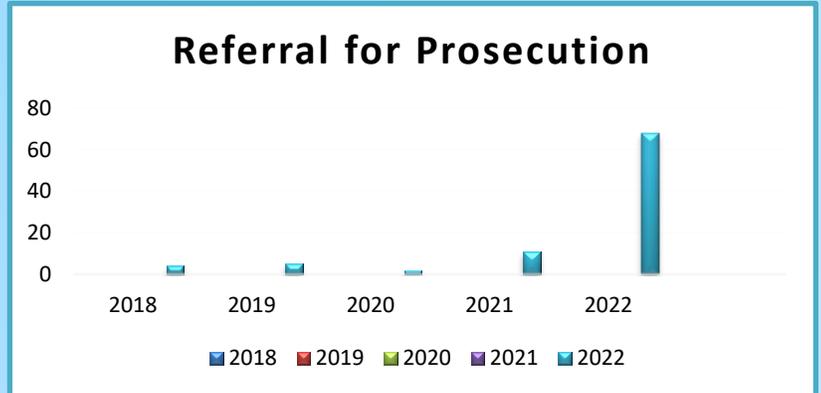
Corruption Prosecution Division Dashboard

Financial Investigation Matters Within the Division

Current Reporting Period

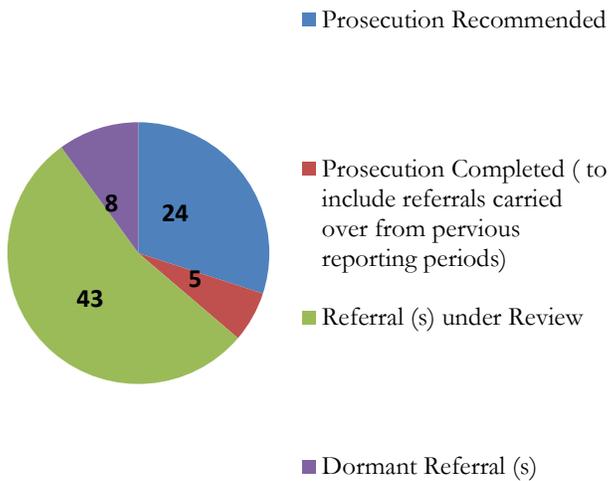


Five Year Comparison

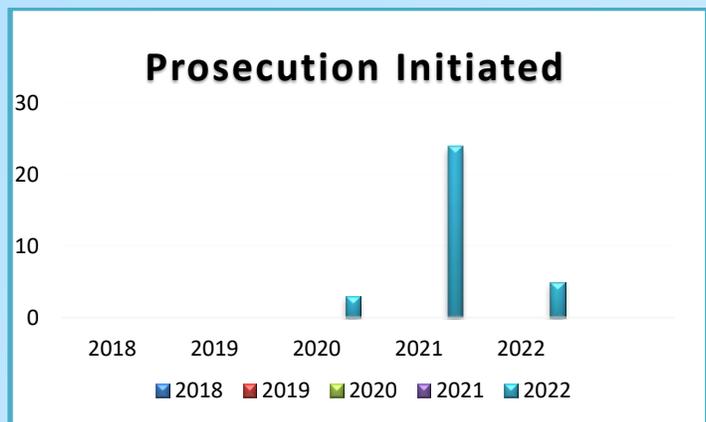


Status of Matters in the Division

Current Reporting Period

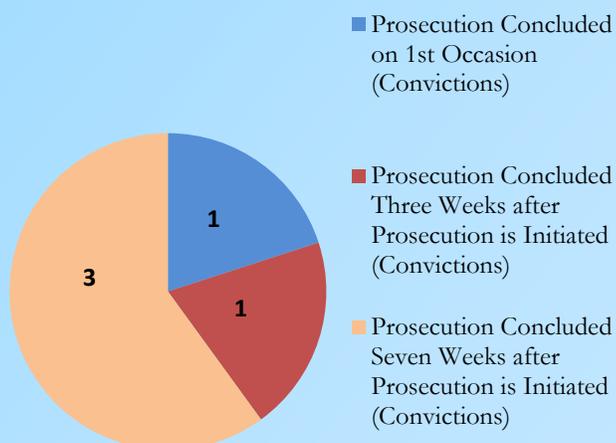


Five Year Comparative Chart

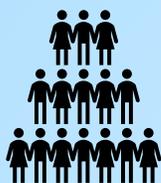


TIME TAKEN TO DISPOSE OF MATTERS WHERE CHARGE IS LAID

For prosecutions undertaken during the period, all the Declarants charged entered pleas of guilty on the first occasion the matters appeared before the Court. Notably, due to the Court's practice of requiring Declarants to file outstanding Statutory Declarations in order to ensure compliance before sentencing, the conclusion of the matters was delayed, as time was allowed for compliance to be effected. For the matter concluded seven (7) weeks after proceedings were initiated, the Declarant, it is to be noted, was unwell and unable to attend and, as a consequence, the matter was further delayed to a time when the Declarant could be in attendance.



Human Resource Capacity



36%
(4 of 11 Staff Members)

INTEGRITY COMMISSION

**MATTERS REFERRED TO THE CORRUPTION PROSECUTION DIVISION FOR THE PERIOD
ENDING MARCH 31, 2023**

TYPE OF REFERRAL	NO. OF MATTERS REFERRED	NO. OF MATTERS RULED FOR CHARGES TO BE LAID	NO. OF MATTERS INVESTIGATED WHICH RESULTED IN PROSECUTIONS	NO OF MATTERS RULED FOR NO CHARGES TO BE LAID	NO OF MATTERS FOR DISCIPLINARY ACTION (DISCHARGE LIABILITY NOTICE	NO OF MATTERS WHERE ADDITIONAL INFORMATION IS REQUIRED	NO OF MATTERS UNDER REVIEW AT CLOSE OF REPORTING PERIOD
Special Reports of Investigations	0	1	0	3	N/A	0	0
Financial Investigation Referrals	68	25	2*	0	N/A	0	43
Discharge Liability Notice	10	N/A	N/A	N/A	6	0	0
Total	78	25	2	0	6	0	43

* One (1) matter referred from previous period, but ruling provided within the current period.

For the reporting period, the CPD received one (1) Financial Investigation referral from the Investigation Division (ID) in the second quarter, sixty (60) additional referrals in the third quarter, and seven (7) in the final quarter, bringing the total number to sixty-eight (68) Financial Investigation matters being referred for the period. These new referrals were supplemented by the ten (10) Financial Investigation referrals that were received at the close of the period 2020/2021, and two (2) received in the last quarter of the period 2021/2022.

Of the sixty-eight (68) matters received during the period, prosecution was recommended for twenty -five (25) Declarants, while the remaining forty-three (43) referrals were under review at the close of the period. Prosecution was initiated and concluded in one (1) of the twenty-five (25) matters ruled for prosecution with conviction recorded. Summonses were issued in the remaining twenty-four (24) matters which are scheduled for Court in the first quarter of the coming period.

Of the ten (10) Financial Investigation referrals that were received at the close of 2020/2021, following a response from the Medical Council of Jamaica providing updated information to assist in locating Declarants, prosecution was initiated and concluded in two (2) of the matters, with conviction recorded in one (1) matter, and the other matter being withdrawn by the Prosecution. There were, however, challenges in locating the remaining eight (8) Declarants and, consequently, the matters have been deemed dormant until additional information is obtained that will assist in locating these Declarants.

For the two (2) referrals received in the last quarter of the period 2021/2022, prosecution was initiated and concluded within the reporting period, with conviction recorded.

From the Information and Complaints Division (I&C), the CPD received eleven (11) requests to approve the issuance of Discharge Liability Notices, and approval was granted in six (6) of the matters.

Activities Undertaken During the Reporting Period

The Corruption Prosecution Division (CPD), as part of its mandate, has responsibility for determining at the conclusion of an investigation so referred, what criminal charges, if any, may be brought against an individual or individuals, who have been deemed to have committed an act of corruption on the evidence made available, being an offence arising under the common law or any enactment.

- 1 During the period, the CPD was asked to provide support to the Protected Disclosures Unit of the Information and Complaints Division and was, therefore, tasked with preparing content for the training of Designated Officers under the **Protected Disclosures Act** and delivering the first module of the training entitled, "Legislative Framework in Jamaica".
- 2 The CPD, additionally, contributed to a proposed position paper on 'Issues for the Criminalization and/or Sanctioning of Cronyism, Nepotism, and Clientelism in Jamaica' at the request of the Corruption Prevention, Stakeholder Engagement, and Anti-corruption Strategy Division (CPSEACS). In the third quarter of the period, the Division met with members of the CPSEACS to discuss the position paper and provide responses to questions posed in a bid to propose solutions for issues identified.
- 3 The CPD continued to provide, during the period, support to stakeholder engagements organized by the Corruption Prevention, Stakeholder Engagement and Anti-corruption Strategy Division. On the request of CPSEACS, representatives from the CPD attended and presented at entities, such as the Office of the Public Defender, and the Ministry of Labour and Social Security (MLSS), as part of the CPSEACS's ongoing Good Governance and Sensitization Training.
- 4 There was, additionally, engagement with other noted stakeholders during the period, and meetings were held with representatives from Jamaica Customs, the United States Embassy and, most recently, Jamaicans for Justice, for discussions on a variety of issues, to include proposed legislative changes being considered by the Joint Select Committee of Parliament, and offering mutual support to the respective mandates of the organizations.
- 5 The Division also provided support to the commemoration of International Anti-corruption Day on December 9, 2022, and contributed to the Commission's official response to a request from the Ministry of Foreign Affairs and Foreign Trade, regarding Jamaica's Commitment to the Summit for Democracy. The Division provided details of the various ways it offers support to the national anti-corruption framework, and acts in accordance with the principles of natural justice and the rule of law when pursuing accountability for those alleged to have engaged in corrupt conduct.
- 6 Support was also provided to the Legal Office in finalizing Memoranda of Understanding with competent authorities during the period, and on November 3, 2022, the Commission signed a Memorandum of Understanding (MOU) with the Jamaica Constabulary Force (JCF).
- 7 During the period, meetings of the Joint Select and Oversight Committees of Parliament were also convened to discuss specific issues regarding the operations of the Commission, and to consider proposed legislative amendments by the Commission and other interest groups, intended to better assist the Commission in the discharge of its mandate.

Technological Infrastructure

The Division continued to lend support to the organization's wider Digitization Project by finalizing Standard Operating Procedures (SOP's) for a number of divisional processes with a view to informing the wider organizational digitization process, and ensuring compliance under the **Data Protection Act**.

Training

Members of the Corruption Prosecution Division were continuously engaged in various training sessions throughout the period, organized both internally and with external stakeholders. New recruits specifically benefitted from Orientation Training sessions facilitated in collaboration with other Divisions, and conducted in modules over a scheduled period. Collaboration continued also with the Office of the Director of Public Prosecutions and the FID with regard to ongoing training seminars and other opportunities for training.

Members of the Unit also participated in the Jamaica Bar Association's (JAMBAR) Annual Conference, and the Prosecutor Empowerment Programme, organized by the Office of the Director of Public Prosecutions, which not only expanded the knowledge base of Division members, but also satisfied the requirements for accreditation in accordance with continuing legal professional development.

Members of the Division also participated in other training sessions in areas of Cybercrime, Financial Investigation, Anti-corruption Indexing, among others, and Certification Training conducted by the International Procurement Institute of Jamaica, was also undertaken by a member of the Unit.

Additionally, preparation for training of Designated Officers under the **Protected Disclosures Act** was conducted in collaboration with the Management Institute for National Development (MIND), and necessitated members of the Division being trained as Trainers, in preparation for these sessions.

Members of the Division also participated in the European Union's Global Facility on Anti-Money Laundering and Countering the Financing of Terrorism held virtually during the period.

Overall, members of the Division participated in excess of one hundred (100) training sessions, across varying skillsets, for professional development and competence building, during the reporting period.

Constraints

At the start of the reporting period, the staff complement stood at five (5) members – the Director of Corruption Prosecution, one (1) Senior Prosecutor, one (1) Prosecutor, one (1) Paralegal and the Legal Secretary - which accounted for fifty-four percent (54%) of the intended complement for the Division. In the second quarter, the Division welcomed another Senior Prosecutor, which represented only fifty percent (50%) of the intended cohort of Prosecutors. There was separation in the first quarter, however, by the Legal Secretary, and later, the Paralegal in the second quarter, which reduced the staff complement within the Unit to approximately thirty-six (36%) percent of the intended number. This remained the staff complement for the rest of the reporting period.

Chapter 8 - Corruption
Prevention, Stakeholder
Engagement & Anti-Corruption
Strategy Division

INTRODUCTION

During fiscal year 2022/2023 the work of the Corruption Prevention, Stakeholder Engagement and Anti-Corruption Strategy Division was targeted and revolved around executing its mandate assigned under the Integrity Commission Act, 2017.

With a limited staff of eight (8) from an establishment of nineteen (19) the Division exposed an estimated two thousand seven hundred (2,700) individuals to the work of the Integrity Commission by virtue of either presentations or training interventions delivered by the Division under its *Anti-Corruption and Good Governance Workshops* and/or via presentations at conferences/retreats and other events and through its various stakeholder engagement sessions.

Broken down, the engagements included delivery to eight (8) Ministries of Government, nineteen (19) Public Bodies, the Shadow Cabinet, four (4) Commissions of Parliament and three (3) Associations or Other Grouping. Additionally, the Division engaged seventeen (17) stakeholders, presented at two (2) international conferences and prepared twelve (12) policy documents/papers/reports including, but not limited to, the articulation and development of the *Code of Conduct Leadership Commitment document*, a *Frequently Asked Questions* document on the work of the Integrity Commission, a *Public Bodies Risk Assessment Framework* and a *Corruption Perception Survey* instrument.

In respect of coordinating the development of a National Anti-Corruption Strategy for Jamaica, as mandated as per section 6 (1) (j) of the Integrity Commission Act, 2017, during the period under review, the consultancy for the development of the anticorruption strategy that was retendered in January 2022 and closed in March 2022 was evaluated and declared nonresponsive and aborted in July 2022.

Given the failed tender processes, the decision was taken by the Commission to commence the in-house coordination and development of the National Anti-Corruption Strategy.

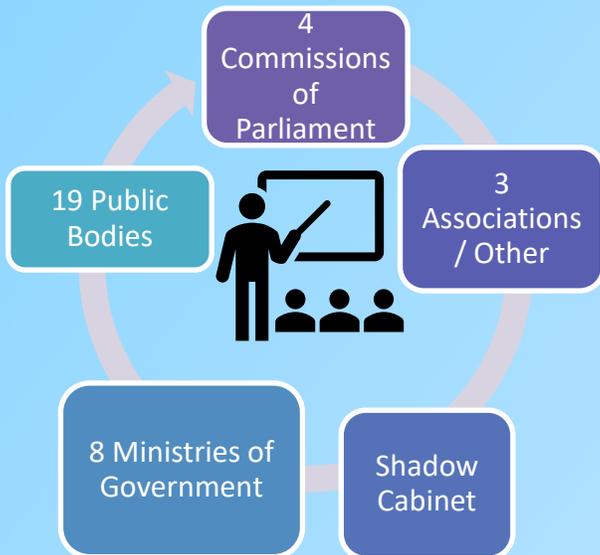
Efforts in this regard, commenced with the empaneling of Technical Working Groups comprised of representatives from the Public Sector, Private Sector and Civil Society and who would subsequently be aligned to sub groups wherein they would be tasked with, *inter alia*, fleshing out respective strategies to inform the National Anti-Corruption Strategy and proposing recommendations to address the issues identified in the assigned thematic areas.

Finally, over the period the Division successfully led the activities of the Integrity Commission in celebration of the United Nations Office on Drugs and Crime led *International Anti-Corruption Day* that was held on December 9, 2022 under the theme "*UNCAC at 20: Uniting the World Against Corruption*". The activities included the production of an audio and video jingle which was disseminated across media platforms and a supplement published in the Jamaica Observer and Jamaica Gleaner newspapers on December 9, 2022.

CORRUPTION PREVENTION, STAKEHOLDER ENGAGEMENT AND ANTI-CORRUPTION STRATEGY DIVISION- DASHBOARD

Current Reporting Period

Presentation at Conferences



Stakeholder Engagements

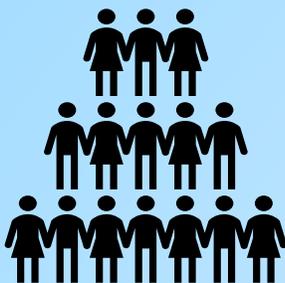


Policy Papers/ Reports



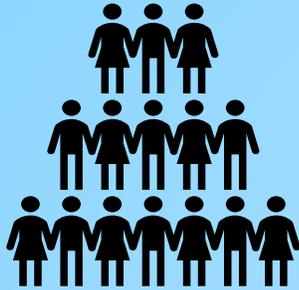
Current Reporting Period

Anti-Corruption Outreach & Education



2,700 (est.)
individuals exposed
to the work of the
Integrity
Commission.

Human Resource Capacity



42%
(8 / 19 Staff Members)

Office of the Director of Corruption Prevention, Stakeholder Engagement & Ant-Corruption Strategy	Anti-Corruption Outreach and Education Unit	Anti-Corruption Policy and Strategic Engagement Unit
Director Corruption Prevention, Stakeholder Engagement & Anti-Corruption Strategy (1 Filled)	Manager Anti-Corruption Outreach and Education (1 Filled)	Manager Anti-Corruption Policy and Strategic Engagement (1 Filled)
Administrative Assistant to the Division (1 Filled)	Public Relations Officer [1 Vacant]	Senior Corruption Prevention Officer (1 Filled)
	Publications and Content Management Officer [1 Vacant]	Corruption Prevention Officer [3 Vacant]
	Outreach Officer [2 Vacant]	Economist/ Statistician [1 Vacant]
	Ethics and Code of Conduct Officer [1 Vacant]	Anti-Corruption Research and Data Analyst (2 Filled)
	Parliamentary & Public Sector Liaison (1 Filled)	
	Private Sector Liaison [1 Vacant]	
	Project Coordinator [1 Vacant]	

Activities undertaken during the reporting period

During fiscal year 2022/2023 the work of the Corruption Prevention, Stakeholder Engagement and Anti-Corruption Strategy Division was targeted and revolved around executing its mandate assigned under the Integrity Commission Act, 2017 as per under:

PUBLIC EDUCATION AND OUTREACH

For the period April 1, 2022 to March 31, 2023 approximately two thousand seven hundred (2,700, estimated) individuals have been exposed to the work of the Integrity Commission by virtue of either presentations or training interventions delivered by the Division under its *Anti-Corruption and Good Governance Workshops* and/or via presentations at conferences/retreats and other events and through our various stakeholder engagement sessions.

The *Anti-Corruption and Good Governance Workshops* cover the following topics:

Module	Topic
1.	<i>The Problem of Corruption</i>
2.	<i>Overview of Jamaica's Anti-Corruption Framework</i>
3.	<i>Principles of Good Governance and Integrity in Public Life</i>
4.	<i>Public Procurement Overview</i>
5.	<i>Other Critical Areas Involving the Integrity Commission's Oversight</i>
6.	<i>Statutory Declarations</i>
7.	<i>Protected Disclosures Act - Whistleblowing</i>
8.	<i>Reporting Allegations of Corruption</i>
9.	<i>Investigating Allegations of Corruption</i>
10.	<i>Prosecuting Allegations of Corruption</i>
11.	<i>Overview of Corruption Offences in Jamaica</i>
12.	<i>International Best Practices in Anti-Corruption and Anti-Bribery</i>

The Division delivered select modules of its *Anti-Corruption and Good Governance Workshops* to select staff of:

Other

No.	Other
1.	Shadow Cabinet ¹⁴

Ministries of Government

No.	Ministries of Government
1.	Ministry of Transport and Mining ¹⁵
2.	Ministry of Agriculture and Fisheries
3.	Ministry of Labor and Social Security ¹⁶
4.	Ministry of Health and Wellness ¹⁷

¹⁴ Presentations delivered jointly with the Investigation, Information and Complaints and Corruption Prosecution Divisions

¹⁵ To include representatives of the Public Procurement Branch/Procurement Committee and Board members associated with various agencies of the Ministry

¹⁶ Presentations delivered jointly with the Investigation, Information and Complaints and Corruption Prosecution Divisions. Standalone Anticorruption and Good Governance workshops also held with select staff

¹⁷ To include representatives of the Nurses and Midwives Group

INTEGRITY COMMISSION

No.	Ministries of Government
5.	Ministry of Justice ¹⁸
6.	Cabinet Office ¹⁹
7.	Office of the Prime Minister ²⁰
8.	Ministry of Industry Investment and Commerce ²¹

Commissions of Parliament

No.	Commissions of Parliament
1.	Electoral Office of Jamaica
2.	Office of the Political Ombudsman ²²
3.	Office of the Public Defender ²³
4.	Integrity Commission ²⁴

Associations/Other

No.	Association/Other
1.	Institute of Chartered Accountants of Jamaica
2.	British High Commission/Defence Academy of the United Kingdom Building Integrity UK Programme Workshop ²⁵
3.	Jamaica Police Federation ²⁶

Agencies of Government

No.	Agency
1.	Island Traffic Authority ²⁷
2.	Coconut Industry Board
3.	Firearm Licensing Authority
4.	Jamaica Antidoping Commission ²⁸
5.	National Works Agency (NWA) ²⁹
6.	National Water Commission
7.	Jamaica Information Service ³⁰
8.	HEART Trust ³¹

¹⁸ Including Presentation delivered jointly with the Investigation Division at their Contractors' Sensitization Session. Standalone Anticorruption and Good Governance workshops also held with select staff

¹⁹ Presentations delivered jointly with the Information & Complaints at *Topical Issues and Educational Forum*

²⁰ Presentations delivered jointly with the Information & Complaints at *Topical Issues and Educational Forum*

²¹ To include presentations to new staff and standalone Anticorruption and Good Governance workshops which included representatives from associated agencies such as the Administrator Generals Department, the Antidumping and Subsidies Commission and the Office of the Supervisor of Insolvency

²² To include representatives from associate groupings including their JCF liaison officers, members of their youth arm and the Political Awareness and Respect Initiative

²³ Presentations delivered jointly with the Investigation, Information and Complaints and Corruption Prosecution Divisions. Standalone Anticorruption and Good Governance workshops also held with select staff

²⁴ Presentation to new staff of the Investigation Division

²⁵ Presentation delivered jointly by the Director of Corruption Prevention and the Director of Investigation

²⁶ *In the Know* Workshop

²⁷ Presentation delivered to Inspectors Group

²⁸ Presentations delivered jointly with the Investigation, Information and Complaints and Corruption Prosecution Divisions. Standalone Anticorruption and Good Governance workshops also held with select staff

²⁹ Presentations on the *Anticorruption framework, the Contract Reporting System (CRS) and the Contracts Cost Overruns and Variations [CCOV]* Presentation delivered jointly with the Investigation Division

³⁰ Presentation delivered to Executive Staff

³¹ Presentation delivered to Senior Executives and members of their Procurement Division

INTEGRITY COMMISSION

No.	Agency
9.	Jamaica Dairy Development Board
10.	Sports Development Foundation
11.	Inspectorate and Professional Standards Oversight Bureau, Jamaica Constabulary Force
12.	Jamaica Special Economic Zone Authority
13.	Jamaica Customs ³²
14.	Jamaica Mortgage Bank ³³
15.	National Irrigation Commission ³⁴
16.	National Land Agency
17.	GC Foster College ³⁵
18.	Department of Correctional Services
19.	Casino Gaming Commission ³⁶

PRESENTATIONS AT CONFERENCES/RETREATS AND OTHER EVENTS

The Division delivered Country Reports at the following conferences:

No.	Event
1.	8th Annual CCAICACB Conference Commonwealth Caribbean Association of Integrity Commissions and Anti-Corruption Bodies
2.	Thirty-Eighth Meeting of the Committee of Experts of the Follow-Up Mechanism for the Implementation of the InterAmerican Convention against Corruption [MESICIC] ³⁷

STAKEHOLDER ENGAGEMENT

The Director and by extension the Division engaged the understated stakeholders during the period under review:

No.	Stakeholder
1.	Ministry of Finance and the Public Service personnel - Financial Secretary, Deputy Financial Secretary - Public Enterprises Division, Senior Director - Public Enterprises Division and Chief Technical Director, Financial Investigations Division
2.	Director General, Major Organized Crime & Anti- Corruption Agency (MOCA) and team
3.	World Bank Managing Director for Development Policy and Partnerships International Finance Corporation Manager for the Caribbean Region
4.	Senior Management Team Ministry of Education and Youth
5.	Executive Committee including the Permanent Secretary Ministry of Education and Youth
6.	Executive Director Caribbean Policy Research Institute CAPRI
7.	Executive Director Jamaica Environment Trust JET
8.	Executive Director/Leadership Jamaicans for Justice JFJ
9.	Honorable Speaker of the House of Representatives
10.	Political/Economic Counselor and the Political and Regional Team Lead for the U.S. Embassy

³² Some presentations delivered jointly with the Information & Complaints Division. Standalone Anticorruption and Good Governance workshops also held with select staff

³³ Presentation delivered to Board of Directors and Senior Executives. Presentations delivered jointly with the Information & Complaints Division (Protected Disclosures Act)

³⁴ Presentations delivered jointly with the Information & Complaints Division. Standalone Anticorruption and Good Governance workshops also held with select staff

³⁵ Presentations delivered jointly with the Information & Complaints Division. Standalone Anticorruption and Good Governance workshops also held with select staff

³⁶ Presentation delivered to Board of Directors and Senior Executives

³⁷ On delegated authority the Director of Corruption Prevention Stakeholder Engagement and Anti-Corruption Strategy delivered the country report for Jamaica at the conference on Wednesday September 14, 2022.

INTEGRITY COMMISSION

No.	Stakeholder
11.	Executive Members of the Jamaica Confederation of Trade Unions JCTU
12.	Commissioner of Customs and Executive team
13.	Public Defender and team
14.	Political Ombudsman and Legal Counsel
15.	President of the Institute of Chartered Accountants of Jamaica ICAJ and Executive team
16.	Office of the Political Ombudsman's School Outreach – Democratic Heritage Tour that was held at the MICO University College
17.	Chairperson, Crime Stop and Manager

ATTENDANCE AT WORKSHOPS/CONFERENCES/EVENTS/OTHER

No.	Workshops/Conferences/Events/Other
1.	Independent Assessment of the Strengths and Weaknesses of Jamaica's Tax Administration System - Treatment of Corruption Connected to the Administration of Taxes ³⁸
2.	1st Meeting of the Joint Select Committee of Parliament empaneled to review the Integrity Commission Act
3.	Integrity Commission Joint-Select Oversight Committee
4.	Jamaica Customs Anti-Corruption Panel Discussion that was held under the theme “ <i>Combatting Corruption, My Fight, Your Fight. Our Fight</i> ”
5.	Financial Investigations Division FID workshop on <i>Unexplained Wealth Orders</i>
6.	Jamaicans for Justice, <i>Justice for All</i> launch
7.	Jamaica Constabulary Force/Integrity Commission <i>Memorandum of Understanding</i>
8.	National Fisheries Authority Blue Justice Initiative
9.	Office of Utilities Regulation 25th Anniversary Long Service Awards and Dinner
10.	Jamaicans for Justice <i>Artivism for Change Exhibition and Cocktail Reception</i>
11.	Major Organized Crime & Anti-Corruption Agency/Crime Stop <i>Memorandum of Understanding</i> MOU signing and Launch of Tip Line
12.	Jamaica Accountability Meter Portal/Private Sector Organization of Jamaica <i>Strengthening Citizen's Role as a Partner for Improved Governance and Accountability</i>
13.	Financial Investigations Division FID Conference – <i>Widening the use of POCA through Collaboration</i>
14.	The Follow-Up <i>Mechanism for the Implementation of the Inter-American Convention against Corruption</i> - MESICIC Conference March 2023
15.	United Nations Office on Drugs and Crime [UNODC] United Nations Convention against Corruption 11th open-ended intergovernmental expert meeting to enhance international cooperation focused on “ <i>Strengthening international and multilateral cooperation to further prevent, identify, investigate and prosecute corruption during times of emergencies and crisis response and recovery</i> ”
16.	United Nations Office on Drugs and Crime [UNODC]: Hybrid global online consultation on <i>corruption measurement</i>

³⁸ In furtherance and follow up of the participation of the Statutory Directors with Tax Administration which hosted a virtual multiagency tax administration diagnostic assessment mission on September 13-28, 2021 with the aim being to provide an objective assessment of the strengths and weakness of Jamaica’s tax system and the treatment of corruption connected to the administration of taxes the Statutory Directors met on September 24 2021 and May 20, 2022 with representatives of the IMF and the IADB and Tax Administration of Jamaica officials to further discuss matters pertaining to the assessment.

PREPARATION OF POLICY PAPERS/REPORTS/OTHER DOCUMENTS

During the period under review the Division:

No.	Policy Papers/Reports
1.	Prepared Divisional response and coordinated the response of the Commission to the Ministry of Foreign Affairs and Foreign Trade in respect of Jamaica's commitments under the <i>Summit of Democracy</i> .
2.	Prepared <i>Frequently Asked Questions</i> document on the Work of the Integrity Commission ³⁹
3.	On a request from the Ministry of Legal and Constitutional Affairs prepared input to inform <i>Country report on anticorruption public education programmes and initiatives being undertaken by Jamaica</i> and that was prepared for presentation at the <i>Follow-Up Mechanism for the Implementation of the Inter-American Convention against Corruption</i> MESICIC conference that was held over the period Monday September 12, 2022 to Thursday September 15, 2022
4.	Articulated and developed the <i>Code of Conduct Leadership Commitment Document</i>
5.	Collaborated with the Information and Complaints Division in the preparation of material for publication re the <i>Processes involved in the filing of Statutory Declarations</i> . ⁴⁰
6.	Provided the Commission's insert for the <i>Follow-Up Mechanism for the Implementation of the Inter-American Convention against Corruption</i> MESICIC country report which was dispatched by the Attorney General's Chambers to the OAS Secretariat.
7.	Ensured that the <i>Memorandum of Understanding</i> that was finalized between the <i>Management Institute for National Development MIND and the Commission</i> in respect of the Protected Disclosures Officers Training Programme speaks to infusing anti-corruption and good governance prevention training in the modules of existing and future MIND Programmes along with their Orientation Programme for new entrants in the Public Service.
8.	Finalized and submitted the Division's <i>Anticorruption and Good Governance</i> Module for delivery on the Information and Complaints Division led <i>Protected Disclosures Officers Training Programme</i> and committed to leading delivery of said content on the programme.
9.	Met with the Office of the Services Commission and the consultants reviewing the <i>Public Service Regulations</i> and used the opportunity to verbally articulate the need to infuse anti-corruption and good governance principles in the revised Public Service Regulations.
10.	Drafted a <i>Public Bodies Risk Assessment Framework</i> which was framed in the context of the mandate of the Division as per s. 6 (1) (c) and (d) of the Integrity Commission Act, 2017 which speaks to taking necessary and effective measures for the prevention and detection of corruption within public bodies and examining the practices and procedures of public bodies and make recommendations in relation to the revision of these practices and procedures. The intention of the Public Bodies Risk Assessment is to, <i>inter alia</i> , evaluate the extent of potential corruption and integrity risks, which may be attributed to government contracting, corporate governance and recruitment practices within public bodies, serve as the evidential basis for the formulation of a corruption and integrity risk profile for public bodies with respect to the specified areas of interest and to periodically serve as the evidential basis for the formulation of an anti-corruption & integrity programme for selected public bodies. The intention is to commence this initiative in FY2023/2024.
11.	Developed a <i>Corruption Perception Survey</i> and began manually administering same to individuals who participated in the <i>Anti-Corruption and Good Governance Workshops</i> . Efforts at digitizing the form and its placement on the IC's website commenced during the period under review. The intention is to have this process digitized in FY2023/2024.
12.	Coordinated the preparation of the Commission's Annual Report for Fiscal Year 2021/2022
13.	Prepared the <i>Divisional insert for the Commission's Annual Report</i> for Fiscal Year 2021/2022

³⁹ Accessible on the website of the Integrity Commission at www.integrity.gov.jm

⁴⁰ Media release issued and placed on the Commission's website

COORDINATING THE DEVELOPMENT OF THE NATIONAL ANTI-CORRUPTION STRATEGY

- Section 6 (1) (j) of the Integrity Commission Act, 2017 mandates the Commission to co-ordinate the implementation of an anti-corruption strategy. In this regard, during the period under review the consultancy for the development of the anticorruption strategy that was retendered in January 2022 and closed in March 2022 was evaluated and declared nonresponsive and aborted in July 2022.
- Given the failed tender processes the decision was taken to commence the in-house coordination and development of the National Anti-Corruption Strategy. Efforts in this regard commenced during the period under review with the commencement of the process of empaneling Technical Working Groups comprised of representatives from the Public Sector, Private Sector and Civil Society and who would subsequently be aligned to sub groups wherein they would be tasked with, inter alia,
 - a) *fleshing out respective strategies to inform the National Anti-Corruption Strategy;*
 - b) *exploring the subsets of activities/issues/challenges under the main thematic areas which has some bearing on the anti-corruption effort in Jamaica;*
 - c) *Identifying issues within the thematic area which are of relevance to the anti-corruption agenda and for which action is warranted;*
 - d) *proposing recommendations to address the issues identified in the assigned thematic areas;*
 - e) *assigning responsible actors and timeframes for the implementation of the proposed recommendations; and,*
 - f) *reviewing and providing written feedback on the draft National Anti-corruption Strategy.*
- During the period under review the Division periodically provided updates on the coordination and development of the National Anti-Corruption Strategy to **the Jamaica Open Government Partnership** of which the development of the National Anti-Corruption Strategy is a deliverable and to the Ministry of Finance and the Public Service under the GOJ **Economic Reform Programme (ERP)** monitoring report which is based on the Priority Actions Matrix for the GOJ ERP which was approved by the Executive Board of the IMF on November 4, 2019 under the sixth review of the SBA and to which the development of the National Anti-Corruption Strategy is also a deliverable.



INTERNATIONAL ANTI-CORRUPTION DAY

- The Division successfully led the activities in celebration of the United Nations Office on Drugs and Crime led *International Anti-Corruption Day* that was held on December 9, 2022 under the theme “*UNCAC at 20: Uniting the World Against Corruption*”. The activities included the production of an audio and video jingle which was disseminated across media platforms and a supplement published in the Jamaica Observer and Jamaica Gleaner newspapers on December 9, 2022.

MEDIA ENGAGEMENT

During the period under review the Division:

- As part of its public outreach and public education campaign, assisted in the articulation of generic content on Anti-Corruption and Good Governance, which was placed by the Executive Office on the Commission's twitter page.
- Conceptualized a dedicated spot on the **website of the Integrity Commission to showcase the activities of the Division in respect of public education and outreach**. The link went live on Tuesday August 30, 2022 and is regularly updated.
- Through the Commission issued on Wednesday November 30, 2022 a **media release highlighting the Work of the Division** over the period April to September 2022 representing Quarters 1 and 2 of FY 2022/2023
- Through the Commission issued on Thursday June 2, 2022 a media release re the **Anti-Corruption and Good Governance Workshops that was held for Members of the Shadow Cabinet** that concluded on May 30, 2022.

OTHER PRESS RELEASES ISSUED FEATURING THE CORRUPTION PREVENTION, STAKEHOLDER ENGAGEMENT AND ANTI-CORRUPTION STRATEGY DIVISION

- Through its *Anticorruption and Good Governance Workshops for Public Officials* the Director delivered a presentation on *Anti-Corruption and Good Governance* to Executive Staff of the Jamaica Information Service including its CEO on November 8, 2022. The JIS carried a media piece on the activity on their website on November 9, 2022.
- Through its *Anticorruption and Good Governance Workshops for Public Officials* over the three-day period Wednesday, November 16, 2022 to Friday, November 18, 2022 the Division delivered its *Anticorruption and Good Governance* Workshops to staff of the National Irrigation Commission. The participants included the CEO of the National Irrigation Commission (NIC) and his Senior Executives. In said regard the NIC issued a press release which was carried by the Gleaner newspaper on Wednesday, November 23, 2022.
- The Director delivered a presentation on *Anti-Corruption and Good Governance* to a cohort of Institute of Chartered Accountants of Jamaica ICAJ members on Friday, March 3, 2023. The presentation was the subject of a press release by the ICAJ and was published by the Observer newspaper on Wednesday, March 30, 2023.

Constraints

- The Division was constrained by staffing, having only eight (8) or forty two percent (42%) of its full complement of nineteen (19) staff members as per the establishment.

Going Forward

It is hoped that with the scheduled onboarding of additional staff during FY2023/2024 the work of the Division will accelerate and the interrogation of other areas of the Division's mandate can be further intensified.

Chapter 9 - Legal Department

Legal Department Dashboard

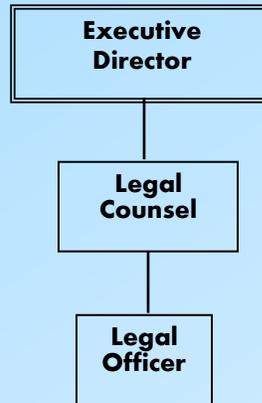
Human Resource Capacity



50%

(1 of 2 staff members)

DEPARTMENT STRUCTURE



COURT PROCEEDINGS- REPORTING YEAR APRIL 1, 2022 TO MARCH 31, 2023

During the reporting year, April 1, 2022 to March 31, 2023, the Commission continued to pursue legal matters which were before the Courts, involving the Commission directly or in relation to legacy Commissions, pursuant to Section 63 of the Integrity Commission Act.

Detailed hereunder are the particulars of the Court proceedings involving the Integrity Commission (IC) for the reporting year:

SUPREME COURT MATTERS

1. In the matter of Section 7 of the Integrity Commission Act (SU2021CV04605)

The matter emanates from the failure of certain financial institutions to provide information requested by the Director of Information and Complaints, primarily on the basis that they are required to keep customers' information secret, pursuant to the Banking Act, except if a Court Order is obtained.

On November 4, 2021, the Commission sought a declaration from the Court that Section 7(2) of the Integrity Commission Act, in its interpretation, mandates that any person or body must cooperate with the Commission in the exercise of its functions under the Act. Further, the Commission sought a declaration that Section 7(8) means that any person or body cooperating with the Commission, shall not be prevented from doing so by virtue of any law that provides for secrecy or any other restriction against the disclosure of information, save for the grounds of legal professional privilege.

INTEGRITY COMMISSION

The matter came on for hearing on July 6, 2022 and the Commission awaits the delivery of the judgment.

2. Ian Hayles et al v Contractor General (2017 HCV 00744):

This matter concerned an application for leave to apply for Judicial Review and injunction restraining the publication of an Investigation Report by the then Office of the Contractor General (OCG) conducted into allegations of conflict of interest, irregularity and/or impropriety in relation to the construction of buildings which was filed in 2017 by Mr. Ian Hayles, then Member of Parliament for Western Hanover, without approval from the Hanover Parish Council, as it then was.

The matter came on for hearing on November 2 and 3, 2022. On December 20, 2022, the Court held that the application for leave to file judicial review is refused as applicants did not satisfy the Court that they had an arguable ground for judicial review with a reasonable prospect for success. It was further held by the Court that the conclusions of the OCG were reasonable based on the evidence garnered during the investigation.

3. Clava Mantock Snr et al v Dirk Harrison et al (SU2020CV02765):

This claim relates to an Application which was submitted to the National Contracts Commission (now referred to as the 'Public Procurement Commission') by the Claimants as Directors of Cenitech Engineering Solutions and which Mr. Dirk Harrison, then Contractor General, deemed to have contained forged documents and inaccurate information and upon that basis, made a referral to the Major Organized Crime and Anti-Corruption Agency (MOCA). Detective Simms, an employee of MOCA, executed the warrant in relation to the referenced charges and the prosecution was conducted by the Office of the Director of Public Prosecutions, for which a no case submission was upheld.

On July 27, 2020, the Claimants sought general damages, special damages, aggravated damages, and exemplary damages for false imprisonment and malicious prosecution. The matter is ongoing.

COURT OF APPEAL MATTERS

4. National Contracts Commission v Cenitech Engineering Solutions et al (COA2021CV00040)
Attorney General v Cenitech Engineering Solutions et al (COA2021CV00035)

The Attorney General filed a Notice and Grounds of Appeal on April 13, 2021. The National Contracts Commission (now Public Procurement Commission) filed a Notice and Grounds of Appeal on May 12, 2021.

These Court of Appeal matters were brought as a result of the Supreme Court Judicial Review decision regarding the decision of the National Contracts Commission (NCC) (now the Public Procurement Commission) to deregister Cenitech Engineering Solutions (hereinafter referred to as 'Cenitech') as a Works Contractor.

The Public Procurement Commission and the Attorney General's Chambers (AGC) are primarily challenging the decision held concerning the Judicial Review, which was in favour of Cenitech, and which awarded costs to Cenitech, the Integrity Commission and the Ministry of Agriculture.

Both Appellants filed Applications seeking a stay of the Judicial Review decision in relation to the assessment of damages and payment of costs. Both Appeals were heard together during the week of November 28, 2022. The Commission awaits the delivery of the judgment.

INTEGRITY COMMISSION

MATTERS CONCERNING COSTS AWARDED BY THE COURT TO/AGAINST THE OFFICE OF THE CONTRACTOR GENERAL/INTEGRITY COMMISSION:

The following table outlines matters in which costs were awarded by the court to/against the Office of the Contractor General/Integrity Commission:

#	Court Matter	Costs Awarded to The Office of The Contractor General/Integrity Commission	Costs Awarded Against the Office of The Contractor General/Integrity Commission	Status
1	Construction Solutions Limited and Vincent Taylor v The Contractor General	\$1,392,171.15	-	A Bill of Costs totalling \$1,392,171.15 was filed and served on August 13, 2020, on the Claimants' attorney-at-law. The Claimants have not sought to respond to the Bill of Costs with the result that the Commission filed a Default Costs Certificate on December 23, 2020. The Default Costs Certificate was executed on August 12, 2022, and served on the Claimants' attorney-at-law.
2	Dwight Reid et al v Contractor General	\$3,295,198.00	-	The debtors have paid \$2,123,259.37. As at September 29, 2020, the Commission was informally made aware of the death of one of the debtors. An effort to contact the sole remaining debtor has been unsuccessful. As no meaningful purpose would be served in continuing the pursuit of remaining sum, the Commission has decided that the matter should be brought to a close.
3	Cenitech Engineering Solutions Ltd. v Contractor General et al	-	-	The then Office of the Contractor General (OCG) was awarded costs on an interim application in 2014, as well as costs in the claim at the conclusion of the Judicial Review for which judgment was delivered in 2021. These costs will be assessed and taxed, if not agreed.

INTEGRITY COMMISSION

#	Court Matter	Costs Awarded to The Office of The Contractor General/Integrity Commission	Costs Awarded Against the Office of The Contractor General/Integrity Commission	Status
				This process has not commenced as it is pending the outcome of an Appeal which was filed in relation to the judicial review judgment. The award of costs has not yet settled as the results of the Appeal is pending.
4	Gorstew Ltd. and the Hon. Gordon Stewart, OJ. v. The Contractor-General	-	-	The Claimants were awarded costs to be agreed or taxed. This process has not commenced as no steps have been taken by the Claimant to recover costs.

LEGAL ASSISTANCE PROVIDED TO OTHER DIVISIONS FOR THE REPORTING YEAR APRIL 1, 2022 TO MARCH 31, 2023

The Legal Department provides general legal advice to the Commission, specifically its statutory and non-statutory divisions. The nature of the matters varies and primarily concerns the following areas: Contract Law, Employment Law, Administrative Law, Procurement and Corruption.

The following outlines a general overview of the legal support which was provided by the Legal Department for the reporting year April 1, 2022 to March 31, 2023:

Legal Opinions and General Legal Advice

- (a) Provided legal opinions and general legal advice on matters primarily concerning contract, administrative, and employment law.
- (b) Drafted and amended several internal policies and procedures to further guide the operations of the Commission.

Memoranda of Understanding

- (a) Facilitated the further execution of Memoranda of Understanding (MOUs) with Competent Authorities pursuant to Section 7(12) of the Integrity Commission Act, with a view to increasing the collaboration between the Integrity Commission and Competent Authorities in relation to the prevention, detection and investigation of an act of corruption.

A MOU between the Integrity Commission and the Jamaica Constabulary Force (JCF) was executed on November 2, 2022.

INTEGRITY COMMISSION

MOUs between the Integrity Commission and the Jamaica Customs Agency (JCA) and the Revenue Protection Division (RPD) are in the process of being finalized.

Legislation

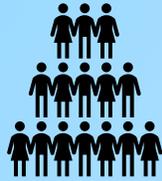
- (a) Managed the process in relation to the further preparation of Drafting instructions for the Regulations to the Integrity Commission Act.
- (b) Managed the process in relation to the further preparation of Drafting instructions for the Integrity Commission Act (Amendment of Form Specified in the Third Schedule) Regulations, 2021.
- (c) Managed the review of the Standard Operating Procedures of the Integrity Commission to ensure compliance with the Data Protection Act. The Commission now intends to engage a Data Protection Officer to monitor, in an independent manner, the Integrity Commission's compliance with the provisions of the Data Protection Act.
- (d) Assisted with the review of and the preparation of submissions to be made to the Joint Select Committee of the Parliament of Jamaica in relation to the review of the Protected Disclosures Act.
- (e) Assisted with the review of and the preparation of submissions made to the Joint Select Committee of the Parliament of Jamaica in relation to the review of the Integrity Commission Act.

Contracts, Lease Agreements, and other Agreements

- (a) Reviewed and/or drafted contracts and other agreements in relation to the procurement of various goods and services.
- (b) Negotiated, reviewed and/or drafted lease agreements and licence agreements in relation to the lease and/or licence of the office locations and parking bays occupied by the Integrity Commission.
- (c) Addressed matters related to the relocation of the Integrity Commission in which legal implications arose.

Chapter 10 - Information Technology and Business Processes Division

Human Resource Capacity

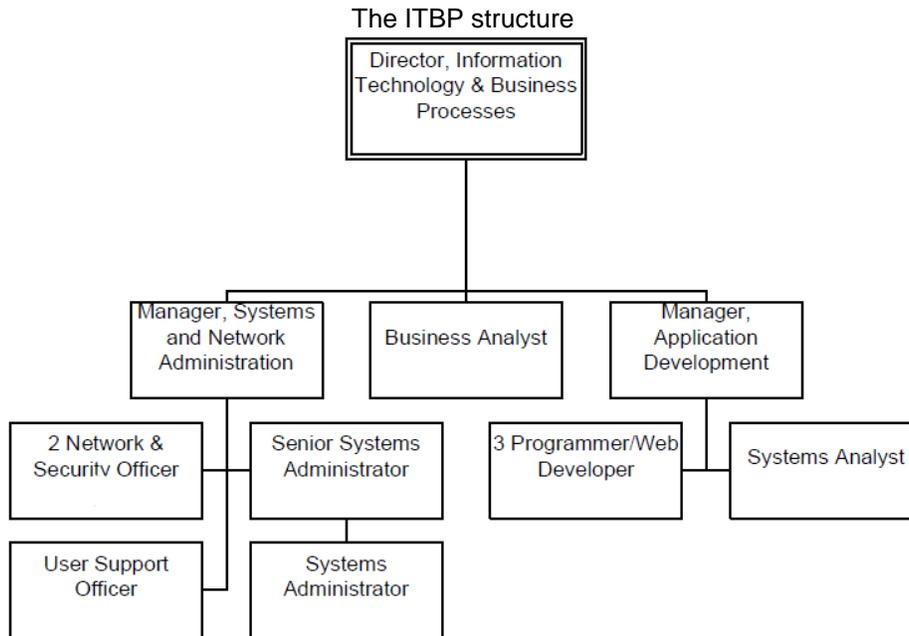


54%
(13 Staff Members)

Office of the Director of Information Technology	Software Unit	Systems Unit
Director of Information Technology and Business processes (1 filled)	Manager, Application development (1 filled acting)	Manager, Systems and Network (1 vacant)
Business Analyst (1 vacant)	Programmer, web developer (2 Filled, 1 - vacant)	Network and Security Officer (1 Filled, 1 vacant)
	Systems Analyst (1 vacant)	Senior Systems Administrator (1 filled)
		Systems Administrator (1 filled)
		User Support Officer (1 vacant)

INFORMATION SYSTEMS AND BUSINESS PROCESSES DIVISION

The Information Systems and Business Processes Division is headed by a Director who reports directly to the Executive Director and is currently supported by seven (7) members, with a capacity for twelve (12) as at March 31, 2023



The Information Technology and Business Processes (ITBP) Division is resolute in its mission of servicing the information technology requirements of the Integrity Commission and has embraced the enterprise business process analysis role. The ITBP division currently has two (2) main teams, Systems and Software, focused on the Information Technology (IT) aspects of the Division, a third team is being developed, and additional vacancies are being advertised to be filled.

For the reporting year, the Division’s list of ongoing projects was reviewed by the Board’s AFT Committee, and realigned based on the Commission’s priorities. These were, delivering the eDS application by Jan 1, 2023, completing the Wifi network at Sagicor-Sigma Building by December 15, 2022, completing the ICT infrastructure at the Sagicor-Sigma Building on the 3rd, 5th and 6th floors, the remediation of security vulnerabilities identified by KPMG, and Symptai, and the completion of the data backup infrastructure. All other projects were placed on hold.

These projects had a positive impact on the organization’s efficiency while embracing the emerging business processes of the Integrity Commission as it transforms to achieve its mandate.

The ITBP’s projects were complemented by:

- Supporting, expanding and securing existing IT infrastructure.
- Maintaining and expanding internally developed software.
- Supporting existing business processes.
- Providing general users with assistance.
- Providing recommendations for new technology initiatives

Infrastructure Updating and Maintenance

There were some procurement issues and delays during the first (1st) quarter, owing to the global supply chain issues, where a number of critical items was delayed and some had to be retendered, which all added to the many delays encountered. The Systems Team took this time to advance the preparation of occupying the new offices at the Sagicor-Sigma Building. The ITBP team has:

- Optimized the email system,
- Optimized the file storage system,
- Expanded and secured the IT infrastructure,
- Provided support to the Division's technology requirements (example: Development of the Protected Disclosure Act; anonymous whistle blower software).

Having received some of the delayed critical items, work restarted on installing the ICT infrastructure at the Sagicor-Sigma Building and the refreshing of end of life (EoL) equipment.

Support of Strategic Portfolios

Electronic Declaration System (eDS)

The Information and Complaints Division continued utilizing the eDS application internally before public deployment is approved. Various enhancements were made, based upon requests for new features and for securing Statutory Declarations and the testing of the application.

During the period, the eDS application security was enhanced by integrating the electronic document signing keys to provide a unique hash value for each Declarant's submission, and to ensure that the integrity of each Declaration submitted is maintained. A demonstration was held with the Declarations team for reviewing the enhancements before making the eDS available to the public.

The MoU to co-host the application at the eGov data centre was signed, a site inspection undertaken, and the ISP engaged to install the Internet circuits.

Occupy the Sagicor Sigma offices

The Information and Complaints Division was successfully relocated from the Barbados Avenue offices to the Sagicor-Sigma Building fourth (4th) floor, while works continued on building out the ICT infrastructure on the remaining floors, to include; the data centre, data backup, wired and wireless networks, cctv, access control, telephony (pbx and telephones), and video conferencing rooms and kits, etc.

The timeline for the occupation of the remaining three (3) floors on the Sagicor-Sigma Building was modified to reflect a more realistic time to March 2023, considering that a number of critical equipment was yet to be delivered and build-out issues were to be rectified.

INTEGRITY COMMISSION

Information Security

During the period, the Division's time was spent assessing the Commission's information security risk posture and engaging the services of external auditors to assist in identifying the areas of risks and to make recommendations on how to resolve same. The ITBP team, thereafter, was actively engaged in implementing these recommendations.

In anticipation of the Data Protection Act 2020 (DPA 2020), the Division's policies and procedures were also reviewed and passed on to the Legal Counsel for further assessment for alignment with the requirements of the DPA 2020.

Business Continuity strategy

During quarter 1, an issue was identified with the data backup infrastructure following an incident where a change to a file was lost. This incident triggered an investigation as to the root cause. It was discovered that some systems were not being backed-up. Thereafter, the Systems Team worked on restoring the data backups and successfully accomplished daily and monthly backups of the Commission's data.

The Integrity Commission and Contracts Websites

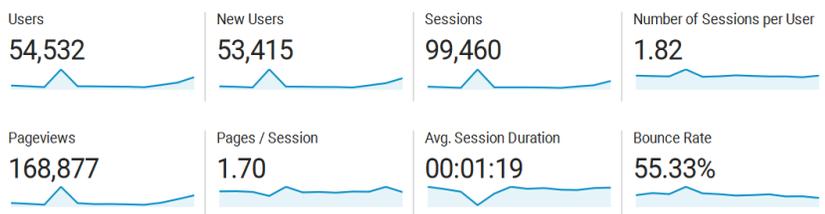
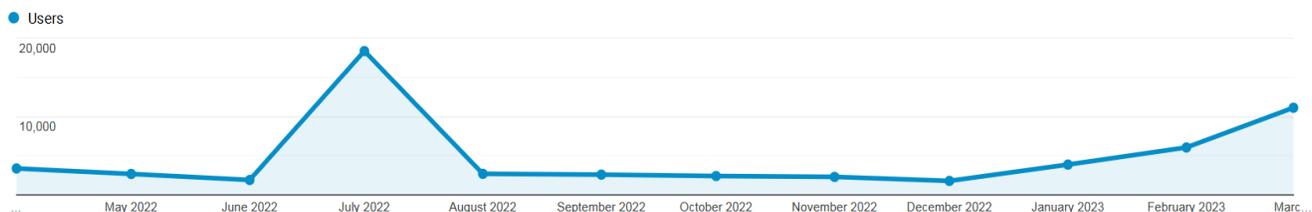
The Integrity Commission utilises and maintains the following three (3) websites:

- The Integrity Commission's website – www.integrity.gov.jm
- Quarterly Contract Awards Portal – qca.integrity.gov.jm
- Contract Cost Overrun and Variation Portal – ccov.integrity.gov.jm

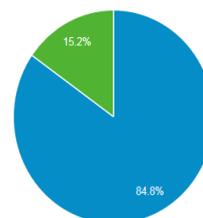
The Integrity Commission's primary website provides pertinent information on matters that relate to the work of the Integrity Commission. The Integrity Commission's website was refreshed to ensure ease of use and navigation by viewers. The primary purpose of the website is to provide a medium that promotes standards of ethical conduct among parliamentarians, public officials and other persons, while promoting transparency in the Government of Jamaica's (GOJ's) Procurement and Contract Award Processes. The website also seeks to ensure that useful and timely information, which relates to the activities and work of the Integrity Commission, is easily accessible to all stakeholders.

Graph showing www.integrity.gov.jm website visits over the period April 2021 to March 2022

Overview



■ New Visitor ■ Returning Visitor



From April 2022 to March 2023, the site had 53415 new users of the website.

Other Software Initiatives that were Completed.

Quarterly Contract Awards (QCA) Portal

The Quarterly Contract Awards Portal was developed to advance the receipt, consolidation and assessment of contract awards that were made by Public Bodies. The system was launched in the third (3rd) quarter of 2012 and facilitated an expansion in the scope of the QCA Regime. Public Bodies are now required to report on all contracts awarded over J\$500,000.00, which would include contracts that require the endorsement of the Public Procurement Commission (PPC).

Contract Cost Overruns and Variations (CCOV) Portal

The Quarterly Contract Awards (QCA) facilitates the collection of data on contracts entered into by public bodies above a value of five hundred thousand Jamaican dollars (J\$500,000.00). If there are cost overruns or variations in contracts, these details are entered using the Contract Costs Overruns and Variations (CCOV) interface. This data is utilized in the organization’s contract monitoring business process.

Prescribed Licences Information Database (PLID)

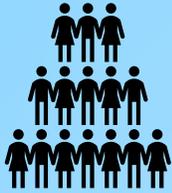
The ITBP completed most of the development for a revamped software system to facilitate the systematic and formal monitoring of the licensing activities executed by Public Bodies. This revamped system will facilitate the gathering and analysis of licences issued, managed and administered by Ministries, Departments and Agencies (MDAs) of the Government of Jamaica. Data will be submitted on a quarterly basis by MDAs. The system is in its final stages of testing and development, after which stakeholders will be sensitized appropriately. This system is scheduled to be launched in the 2022-2023 fiscal year.

Chapter 11 - Corporate Services Division

CENTRAL ADMINISTRATION DASHBOARD

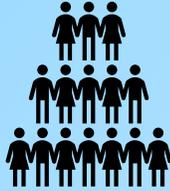
Human Resource Capacity

CENTRAL ADMINISTRATION



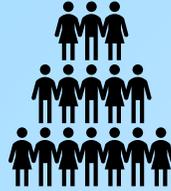
63%
(34 Staff Members)

Executive Division



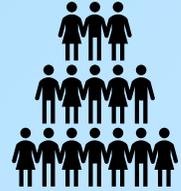
29%
(4 Staff Members)

Corporate Services Division



85%
(23 Staff Members)

Information Technology & Business Processes Division

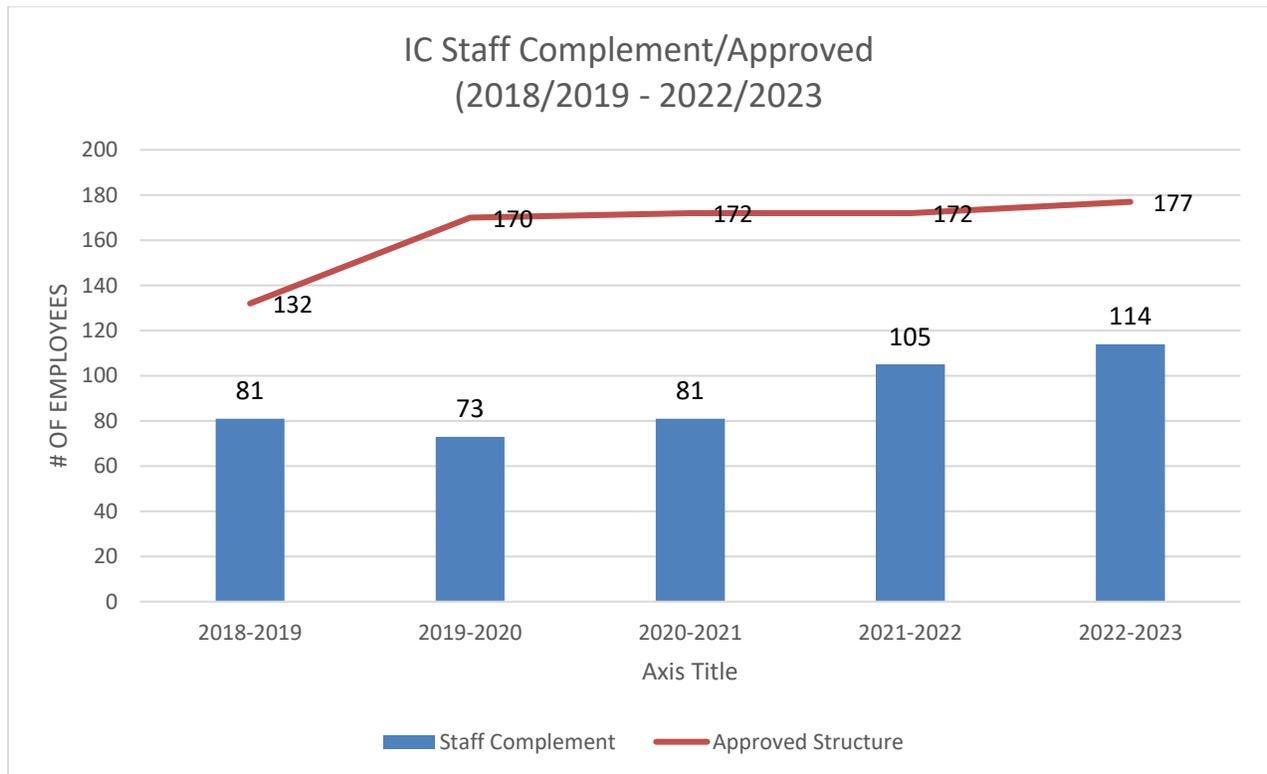


54%
(7 Staff Members)

Corporate Services Division

OVERVIEW

Since the official formation of the Integrity Commission on February 22, 2018, approved amendments to its organizational structure were granted, this to ensure that the structure has the requisite capacity to undertake the objects and functions of the Act. Accordingly, the structure, over the 5-year period, was increased from 132 employees to 177 employees, representing an increase of 34%, whilst the staffing complement grew steadily from 81 employees to 114 employees, representing an increase of 33 employees, or 41% since its inception, as depicted in the cart below.



The Commission, notwithstanding preliminary challenges and setbacks mainly due to the covid-19 pandemic and office space constraints, developed and implemented operational policies, procedures, and strategies in forging its way forward towards fulfilling its objectives.

At the end of the financial year, March 31, 2023, the Commission took occupancy of its new office location to fully accommodate its staffing capacity which closed the year with an overall staff complement of 123 employees, comprising of 114 Fixed-Term Contract (FTC) employees, and 9 temporary employees.

The 114 FTC employees represents an eight percentage (8%) increase over the previous year's complement of 106 employees.

CORPORATE SERVICES

The Corporate Services Division (CSD) is comprised of four (4) departments, namely:

1. Human Resource Management Department
2. Office Services Department
3. Public Procurement Department
4. Registry Department.

At the end of the reporting period, the Division had a staff complement of twenty-three (23) persons across the two (2) locations of the Commission. Private security personnel, which also fall under the Division, are not counted as staff. The Division is headed by a Director who reports directly to the Executive Director.

Human Resource Management

During the reporting period, the CSD, through the Human Resource Management Department (HRMD), gave priority to general staffing activities, to include recruitment, training and development programmes for the organization, performance assessments, and covid-19 management strategies.

New Compensation System

During the year, the HRMD facilitated several discussions with the Transformation Implementation Unit (TIU) of the Ministry of Finance and the Public Service (MOFPS), and its workforce, regarding anomalies and concerns observed in the proposed new compensation system that was received on Friday, February 17, 2023.

In collaboration between the Commission and the TIU, a number of the concerns were addressed, with some of the outstanding matters requiring significant time to resolve.

In the interest of keeping the stipulated timeline of March 31, 2023, the Commission, in agreement with the TIU, implemented the new compensation system, on the basis that continued discussion will be facilitated in resolving the outstanding issues.

MyHR+ Implementation

The HRMD, commenced the implementation of the MyHR+ software system during the year. MyHR+ is an integrated HR and payroll system being rolled out by the MOFPS.

MYHR+ Key Features

- Human Resources Management
- Payroll Management
- Attendance/Absence
- Employee Self Service
- Manager Self Service
- Claims, Subsistence and Travel Allowance
- Organisational Charts
- Recruitment and Selection

INTEGRITY COMMISSION

- Competency Management
- Performance Management
- Training Management

In Phase One of the project, all basic staffing information was updated on the system during the year. Phase Two was approximately 90% completed, and was being finalized, to commence parallel runs, commencing in the 1st Quarter of the 2023-2024 fiscal year.

Staffing Complement

The Integrity Commission commenced the 2022-2023 fiscal year with a staffing complement of 114 employees comprising of 106 fixed-term contracts (FTC) employees and 8 temporary employees.

The Commission ended the fiscal year, March 31, 2023, with a staffing complement of 123 employees comprising of 114 FTC employees, and 9 temporary employees.

MONTHS	FTC EMPLOYEES	TEMP EMPLOYEES	TOTAL HEAD COUNT
Apr-22	107	8	115
May-22	108	9	117
Jun-22	108	9	117
Jul-22	111	9	120
Aug-22	111	9	120
Sep-22	110	11	121
Oct-22	111	11	122
Nov-22	112	10	122
Dec-22	113	9	122
Jan-23	114	9	123
Feb-23	114	9	123
Mar-23	114	9	123
AVERAGE HEAD COUNT	111	9	120

At the end of the reporting period, 21 new employees were onboarded, whilst there were 11 separations.

Overall, the total head count for the year was 120 employees, whilst the Commission recorded a moderate Turnover Rate of 9% as summarized in the Recruitment & Separation table overleaf.

INTEGRITY COMMISSION

Staffing Complement – Recruitment & Separation Table

MONTHS	HEAD COUNT	VACANCIES ADVERTISED	INTERVIEWS CONDUCTED	NEW POSTS ONBOARDED	SEPARATION	TURNOVER RATE
Apr-22	115	6	4	3	2	2%
May-22	117	0	5	4	2	2%
Jun-22	117	2	4	1	1	1%
Jul-22	120	3	5	3	0	0%
Aug-22	120	3	4	2	1	1%
Sep-22	121	3	4	1	1	1%
Oct-22	122	6	5	2	1	1%
Nov-22	122	6	5	2	2	2%
Dec-22	122	0	0	1	0	0%
Jan-23	123	2	3	2	1	1%
Feb-23	123	0	2	0	0	0%
Mar-23	123	6	0	0	0	0%
	120	37	41	21	11	9%

At the end of the 2022-2023 fiscal year, the Commission achieved an employee retention rate of 91%, contributing to a stable workforce to take on the mandate of the organization.

Operationalization of the Approved Structure

Based on the Commission’s recruitment strategy to operationalize the revised structure, approval was obtained from the Ministry of Finance and the Public Service (MOFPS) to activate thirty (30) posts, with effect from January 24, 2022.

Additionally, at the commencement of the fiscal year on April 8, 2022, the Commission received formal approval to increase the its staff complement by five (5), moving its organizational structure from 172 to 177 posts. (See Organization Chart in the Appendices)

Staffing – Recruitment & Separation (FTC Employees) per Quarter

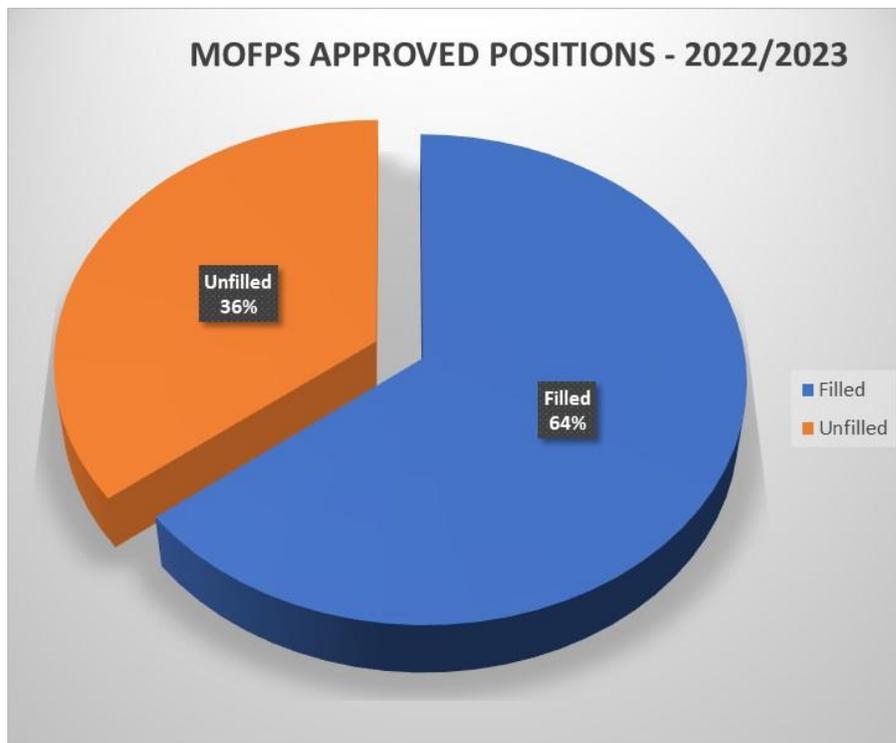
During the reporting period, the Commission onboarded eighteen (18) new FTC employees to the organization, whilst there were ten (10) separations from the organisation as summarized per Quarter below:

DETAILS	QTR-1	QTR-2	QTR-3	QTR-4	TOTAL
Staff Recruitment	7	4	5	2	18
Staff Separation	5	2	2	1	10

INTEGRITY COMMISSION

At the end of the Financial Year, ending March 31, 2023, the Commission's revised structure was at 64% of capacity as depicted below:

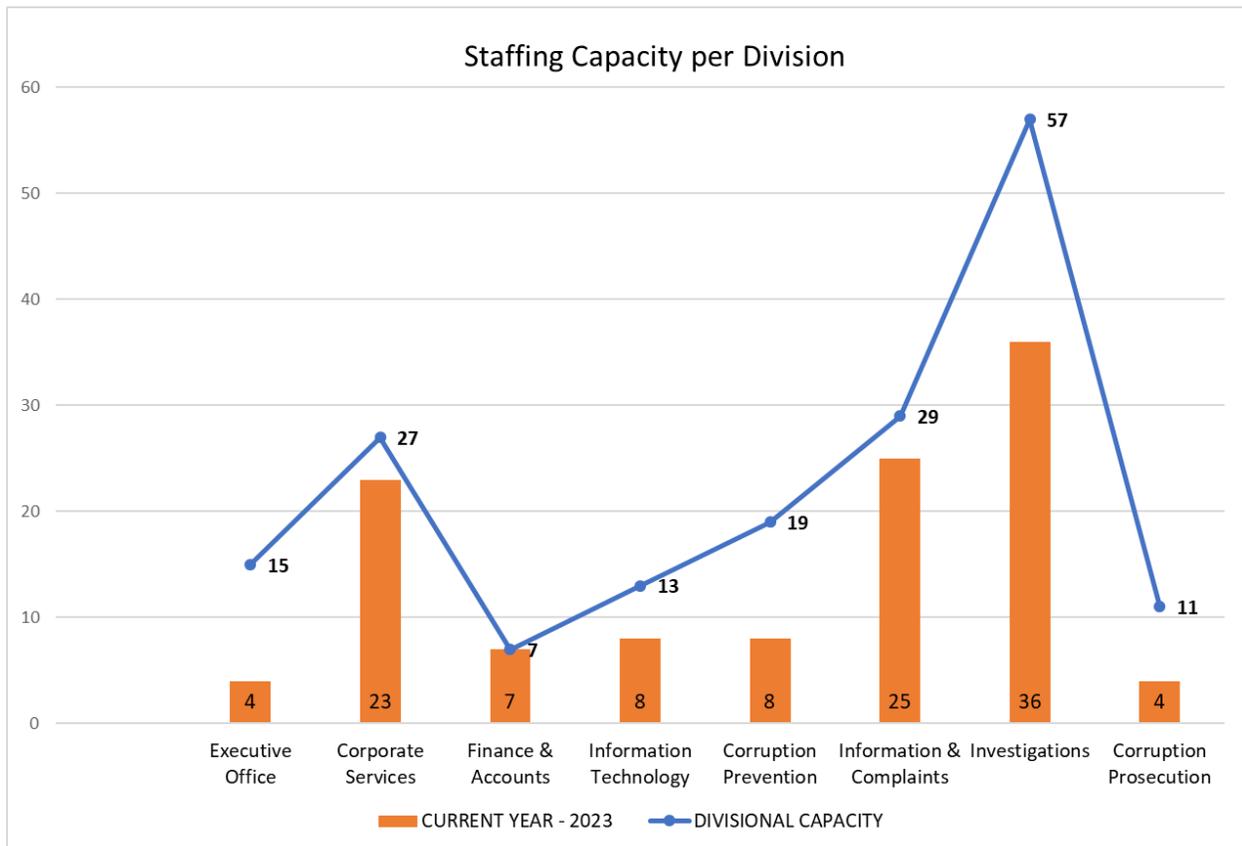
APPROVED STRUCTURE	172		
INTEGRITY COMMISSION	PREVIOUS YEAR (2022)	CURRENT YEAR (2023)	CURRENT % ON STRUCTURE
Executive Office	5	4	2%
Corporate Services	23	23	14%
Finance & Accounts	5	7	4%
Information Technology	8	7	4%
Corruption Prevention	8	8	5%
Information & Complaints	21	25	14%
Investigations	30	36	20%
Corruption Prosecution	6	4	2%
TOTAL ONBOARDED	106	114	64%
% ON STRUCTURE	62%	64%	



INTEGRITY COMMISSION

The capacity per Division, based on the revised structure, is depicted in the table below:

APPROVED STRUCTURE	177		
INTEGRITY COMMISSION	DIVISIONAL CAPACITY	CURRENT YEAR (2023)	CURRENT DIVISIONAL CAPACITY %
Executive Office	14	4	29%
Corporate Services	27	23	85%
Finance & Accounts	7	7	100%
Information Technology	13	7	54%
Corruption Prevention	19	8	42%
Information & Complaints	29	25	86%
Investigations	57	36	63%
Corruption Prosecution	11	4	36%
TOTAL	177	114	
% OF STAFF ON STRUCTURE	64%		



INTEGRITY COMMISSION

Performance Appraisal

During the reporting period, the Human Resource Department, continued its efforts towards improving the performance assessment process, including the review and streamlining of objectives and KPIs for all employees.

The Performance Assessment Instruments, objectives, and Key Performance Indicators (KPI) were also reviewed, and improved during the period.

The Human Resource Department in collaboration with Divisional Heads, processed and completed a total of ninety-three (93) performance appraisals, during the reporting period as depicted in the table below.

MONTHS	Executive	Finance & Accounts	Corporate Services	Information Technology	Corruption Prevention	Information & Complaints	Investigations	Corruption Prosecution	Total
22-Apr			2					1	3
22-May				1			3		4
22-Jun						6			6
22-Jul			6			4	4		14
22-Aug			3			5	8		16
22-Sep	1		1				1		3
22-Oct						2	7		9
22-Nov	2	3	8	4		2	3		22
22-Dec							2		2
23-Jan			1			1	1	2	5
23-Feb					3				3
23-Mar			1		1	3	1		6
TOTAL	3	3	22	5	4	23	30	3	93

Staff Training & Development

During the 2022-2023 period, the organization continued its Training & Development Programme to build the capacity and competency of its employees. At the end of the reporting period, 253 participants completed 38 Training Programmes costing approximately \$9.3M.

Several employees across all Divisions received multiple training during the period.

Key training programmes embarked on during the reported period are summarized below:

- Procurement Training (INPRI) Levels 1 to 4
- Cyber-Security Awareness Training for the Commission
- Leadership & Team Development – Fundamentals of the Appraisal Process
- Leadership & Team Development – Strategies for Management
- Leadership & Team Development – Managing Employee Performance
- Professional Certificate in Anti-Corruption
- Prosecutors Empowerment Training
- Enterprise Risk Management
- Supervisory Management Training
- Cyber Investigation & Cyber Security Management
- Leadership Fundamentals
- GoCASE Training
- Encase Forensic Investigation
- Training the Trainers Workshop for Protected Disclosure

During the year, the Commission also assisted and supported employees in registration, tuition, exams and other fees costing approximately \$1.1M.

Staff Welfare, Awards & Recognition Programmes

The Commission, planned, and successfully facilitated staff welfare and awards programme during the year through our Social Activities Club. The Commission also hosted a Staff Recognition and Awards Ceremony, which formed part of the Commission's Christmas Luncheon/Year-end celebrations.

Eleven (11) staff members were selected, recognised, and awarded for going above and beyond in the undertaking of their daily activities.

The Social Activities Club

The Social Activities Club (SAC) has the responsibility of promoting social interaction and maintaining an environment of camaraderie amongst staff. The SAC is led by an Executive Committee, whose members are nominated by staff and on which all Divisions are represented. Each Committee member serves for a two-year period, with a staggered membership, to allow for continuity, as against the terms of all Committee members coming to an end en bloc.

Occupational Health & Safety Programme

Covid-19 Impact

During the reporting period, the Commission continued its covid-19 preventative measures within the organization to encourage staff to remain vigilant in practicing the established covid-19 protocols and sanitization measures to ensure prevention and control of the virus.

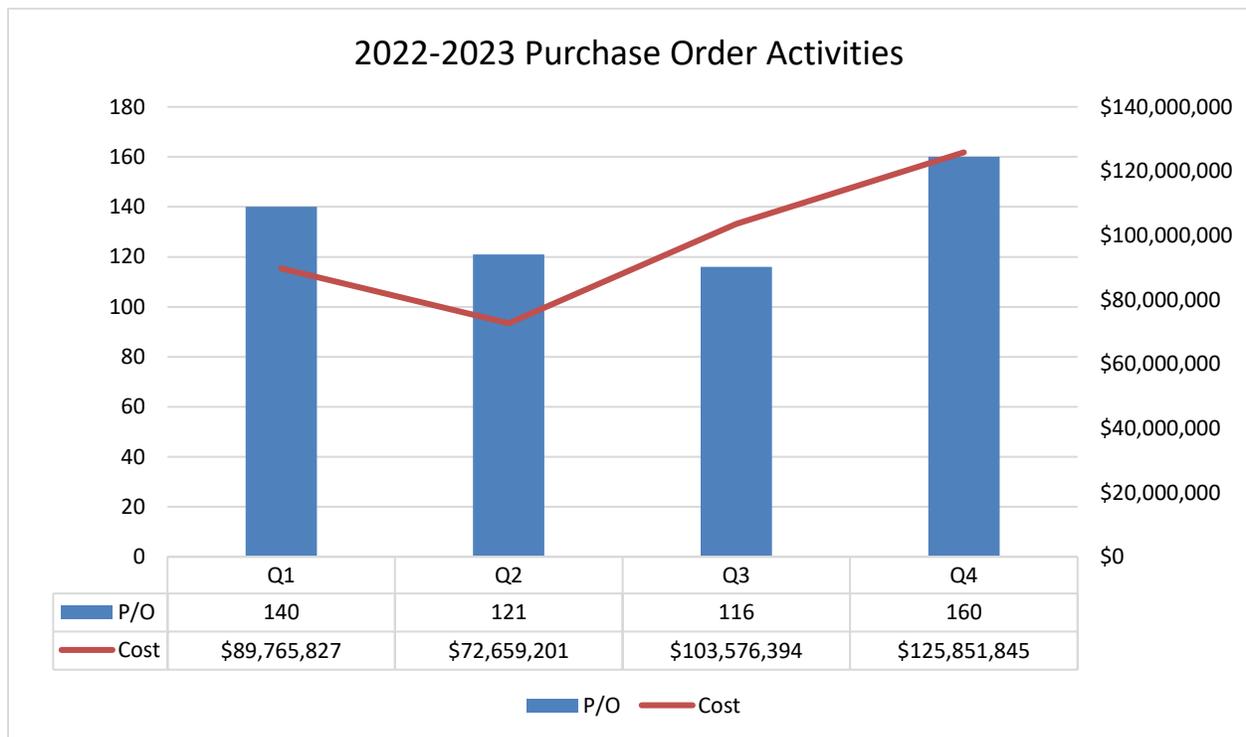
The Commission, during the year, was not significantly impacted from confirmed positive cases as in former years since the pandemic began. The Commission recorded two (2) active Quarters (1st and 4th) which negatively impacted the organization with several confirmed positive cases across both office locations.

Procurement Department

The Procurement Department, during the reporting period, in addition to procuring its normal office, stationery, and grocery items, gave priority to the procurement of capital items and goods and services to suitably outfit its office space located on the 3rd to 6th floors of the Sagicor Sigma Building.

In keeping with the Procurement Act and attendant regulations, the procurement team sought to procure these items that were approved to facilitate the outfitting and relocation of seven of its eight Divisions to the new location.

During the year, the Procurement Department generated 537 Purchase Orders with expenditures totaling approximately \$392M, processed over the four (4) Quarters as depicted in the chart below.



Quarterly Contract Award (QCA) Reports - 2022/2023

All four (4) QCA Reports, for the Commission, for the fiscal year ending March 31, 2023, were prepared and uploaded on the portal within the specified timeframe per Quarter.

Procurement Committee Meetings

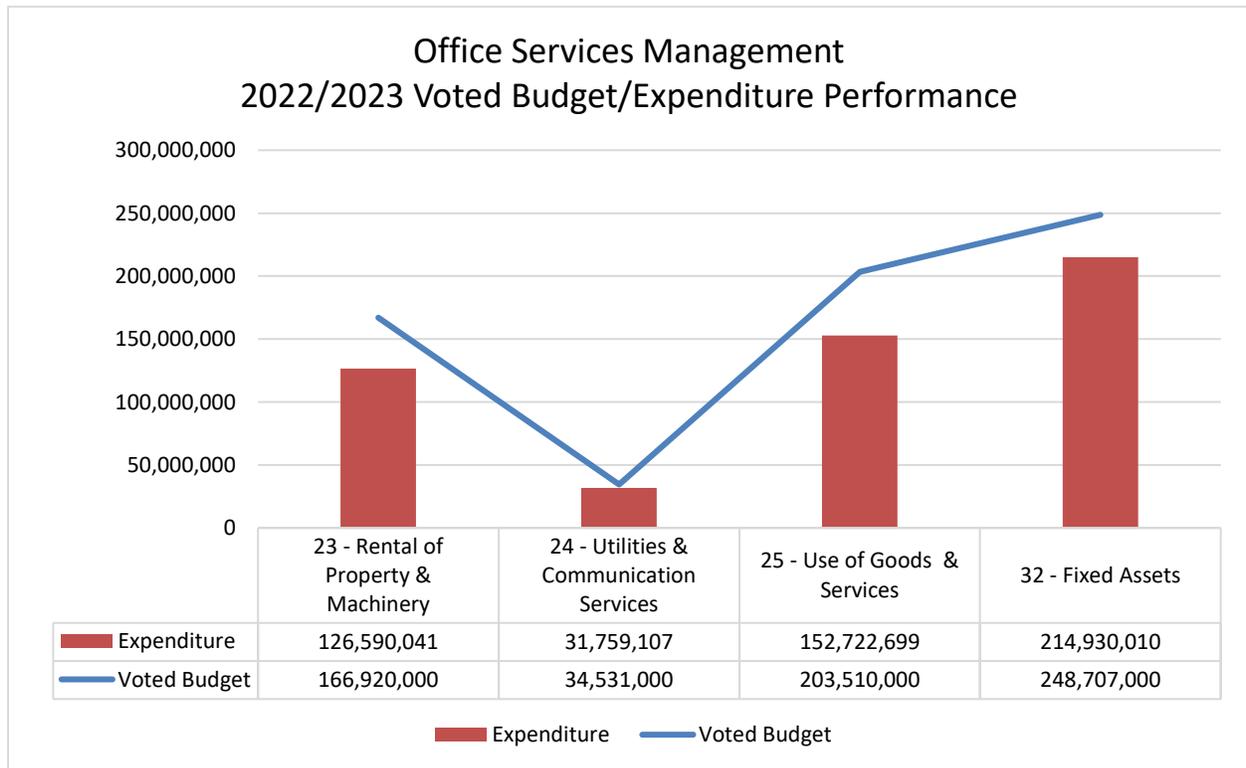
During the reporting period, the Procurement Committee of the Commission held eleven (11) meetings to review and assess 21 submissions from the Procurement Unit.

Office Services

The Office Services Department has direct responsibility for the management of Utilities and Communication Services; Rental of Property & Machinery; Receival and Management of all Assets; as well as Property Management and Maintenance Services at both locations.

During the reporting period, the Department prioritized its efforts in facilitating the procurement of goods and services and fixed assets, specifically for the new Sagicor-Sigma Office location.

The Commission’s approved Recurrent Budget of approximately \$1.476B included provisions for the purchase of other goods and services (\$203.5M), capital expenditure (\$248.7M), and the rental of property and machinery (\$166.9 M) as it relates to operational activities and fulfilling the requirements for the new office location. The performance of the respective budgeted object is depicted in the chart below:



Lease/Rental of Office Space

1. Office space was leased by the Commission from the Free Mason Association (Jamaica) Limited, which is located at 45-47 Barbados Avenue, Kingston 5 (2nd Floor). The lease term was for one (1) year, commencing on June 1, 2021 and expired on May 31, 2022. Following the relocation of the Information and Complaints Division from the location on May 2, 2022, this lease was not renewed or extended.
2. Office space was leased by the Commission from the Planning Institute of Jamaica (PIOJ), located at 16 Oxford Road, Kingston 5 (1st Floor). The lease term is for five (5) years, commencing on the January 1, 2023 and expiring on December 31, 2028, with an option to renew for a further five (5) years.
3. Office space was leased from Sagicor Life Jamaica Limited, located at 63-67 Knutsford Boulevard, Kingston 5 (Sagicor Sigma Building 3rd to 6th floors). The lease term is for ten (10) years commencing September 1, 2021 and expiring on August 31, 2031. There is an option to renew the lease for two (2) further consecutive terms of five (5) years. Possession of the 4th Floor was assumed in May 2022. Possession of the remaining three (3) floors was completed in March 2023.

Lease/Rental of Car Park Parking Facilities

1. Seven (7) parking spaces are included within the lease of property from Planning Institute of Jamaica (PIOJ), located at 16 Oxford Road, Kingston 5 (1st Floor). The lease term is for five (5) years, commencing on the January 1, 2023 and expiring on December 31, 2028, with an option to renew for a further five (5) years.
2. Thirty-six (36) parking spaces have been leased from National Water Commission, located at 18 Oxford Road, Kingston 5. The lease term is for three (3) years, commencing on the May 16, 2022 and expiring on May 15, 2025, with an option to extend.
3. Seventy (70) parking spaces have been leased from Sagicor Life Jamaica Limited, located at 63-67 Knutsford Boulevard, Kingston 5 (Sagicor Sigma Building 3rd to 6th floors). The lease term is for ten (10) years commencing September 1, 2021 and expiring on August 31, 2032.

Office Relocation Project

The 2022/2023 fiscal year commenced with the Commission occupying two (2) office spaces located on the First Floor of the PIOJ Building, at 16 Oxford Road and on the Second Floor of the Masonic Building, at 45-47 Barbados Avenue.

During the 1st Quarter of the reporting period, on May 2, 2022, the Commission commenced formal occupation of the 4th Floor of the Sagicor Sigma Building, with the Information and Complaints Division officially transitioning to the new location from the Barbados Avenue office location.

The Commission continued ardent efforts during the reporting period in finalizing the completion of the three (3) remaining floors (3rd, 5th & 6th floors) at the Sagicor Sigma Building.

INTEGRITY COMMISSION

The relocation of the remaining Divisions, save for the Investigation Division, from the Oxford Road Office to the Sagcor Sigma Building, was completed in March 2023, freeing up much needed office space at the Oxford Road office location.

The Commission, on gaining full possession of its new offices on the Sagcor building, will complete the on-boarding of the remaining portion of its approved staff complement.

Staff Compliance in the Filing of Statutory Declarations of Assets, Liabilities and Income for Year Ending December 31, 2022

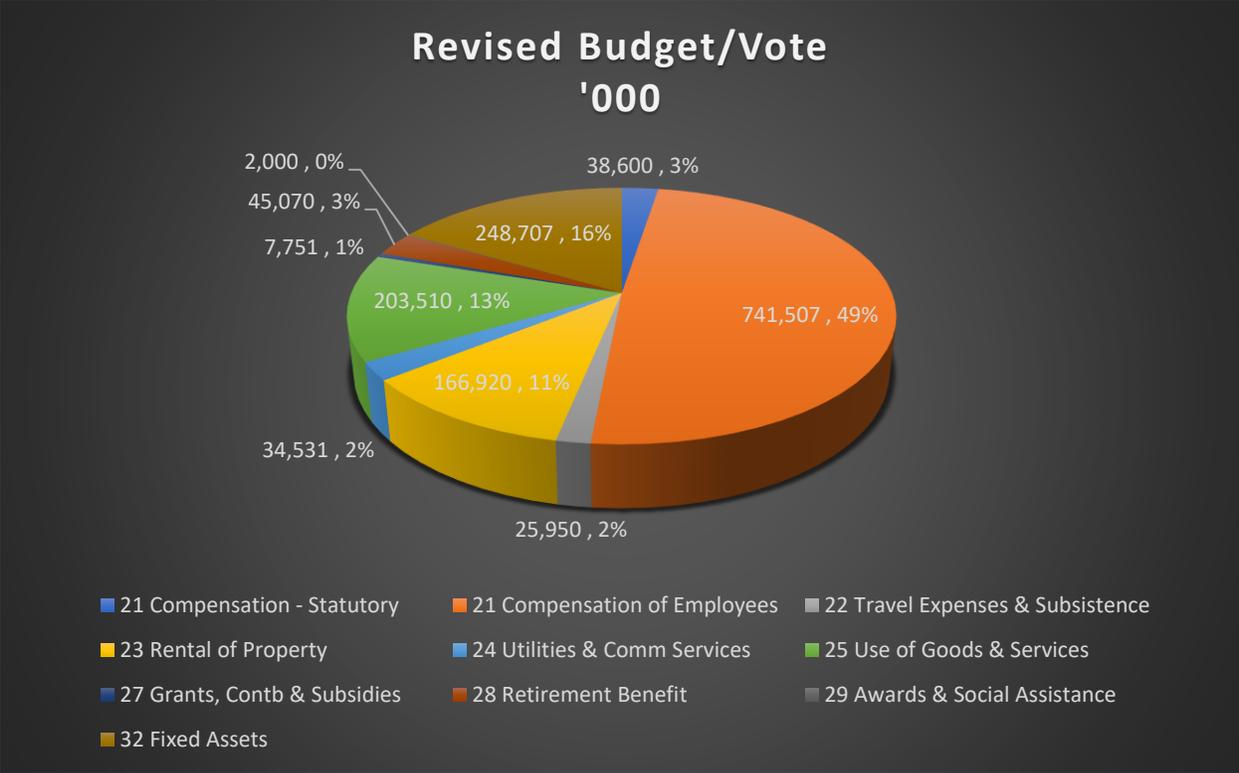
All 122 members of the Commission's Staff, who were required to file Statutory Declaration of Assets, Liabilities and Income as at December 31, 2022, did in fact do so on or before the prescribed March 31, 2023 filing deadline date - thus producing a 100% Compliance Rate.

The Integrity Commission continues to maintain its enviable record of a 100% Compliance Rate for the filing of Statutory Declarations. This goes back to that of its predecessor, the Commission of the Contractor General which, from 2005, going forward, also maintained a 100% compliance rate.

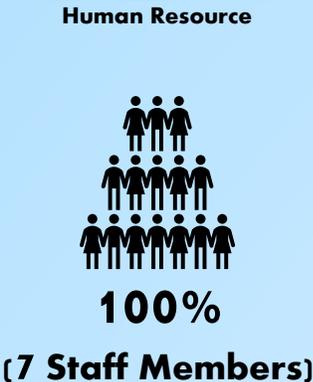
Chapter 12 - Finance and Accounts Division

Finance & Accounts Division Dashboard

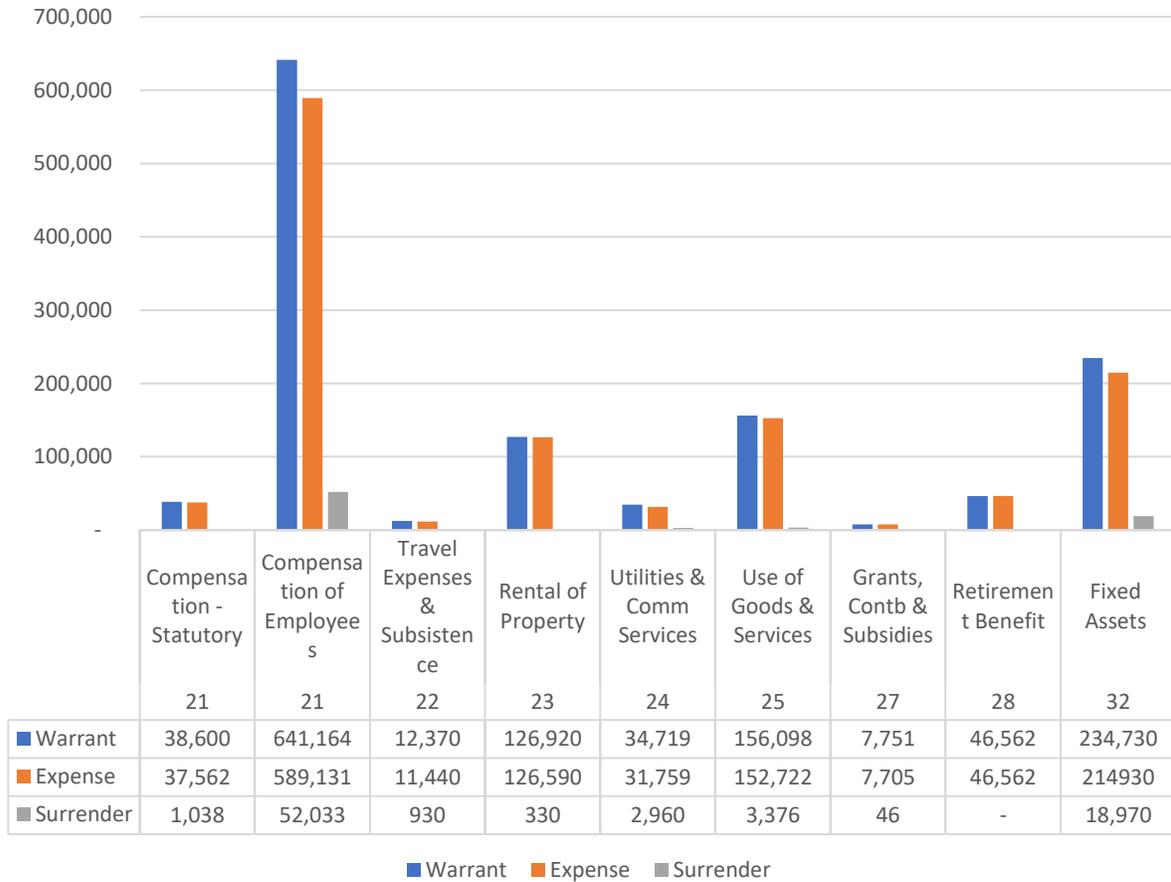
Current Reporting Period



Human Resource Capacity



Warrants, Expense & Surrender March 2023 '000



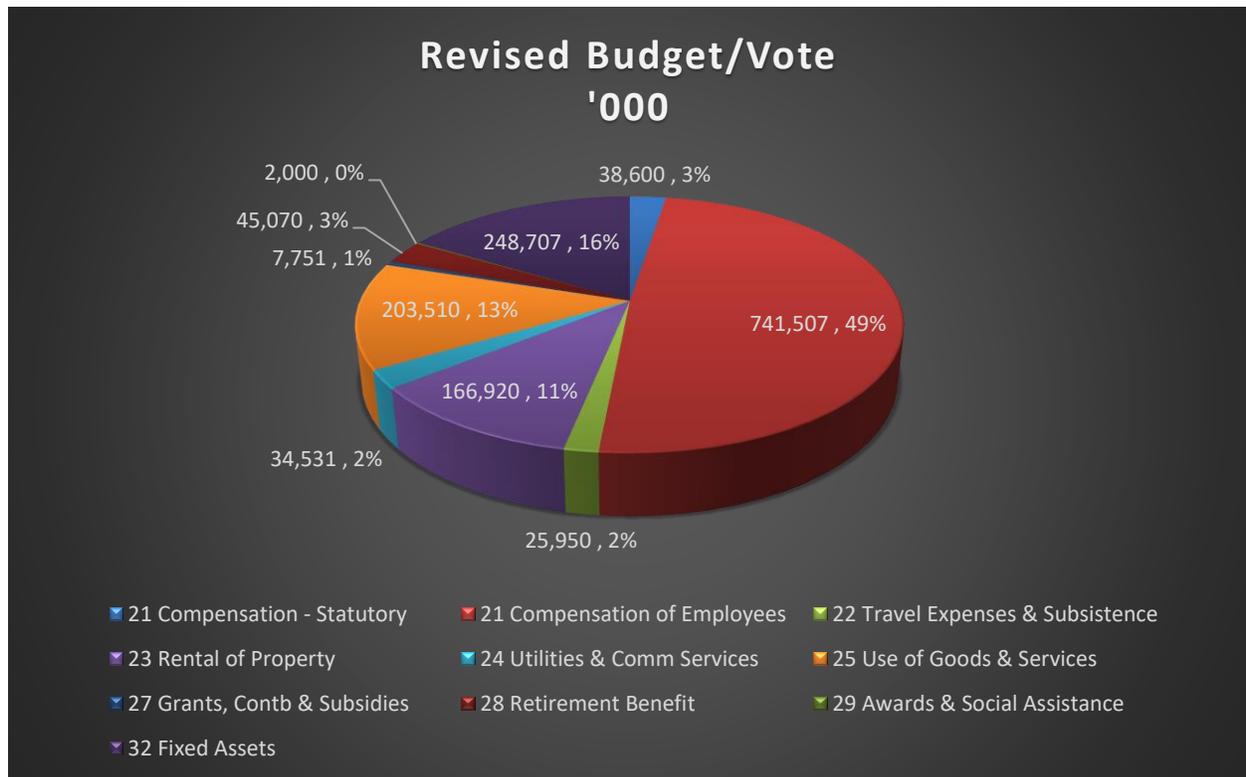
Estimates of Expenditure for the Period April 2022 to March 2023

The Accounting Period April 2022 – March 2023

The Commission’s Estimate of Expenditure Proposals for the Financial Year 2022/2023 were submitted to the Ministry of Finance and the Public Service in November 2022. The approved Budget, including Supplementary Estimates for the year was One Billion, Five Hundred and Fourteen Million, Five Hundred & Forty-Six Thousand Dollars. (\$1,514,546,000). This include Thirty-Eight Million, Six Hundred Thousand Dollars for Statutory Expenditure (\$38,600,000). Additionally, Eighty-Two Million, Nine Hundred and Fifty Five Thousand, Three Hundred and Forty Dollars (\$82,955,340), in Donor Funding, was committed by the Foreign, Commonwealth and Development Office (FCDO). This amount, when added to the balance in the FCDO fund from the previous financial year, totaled One Hundred and Twenty-Nine Million, One Hundred and Seven Thousand Dollars (\$129,107,000)

Breakdown of Revised Budget for 2022-2023

- Recurrent Expenditure – \$1,346,839,000
- Statutory Expenditure – \$38,600,000
- Donor Fund – \$129,107,000
- - \$1,514,546,000

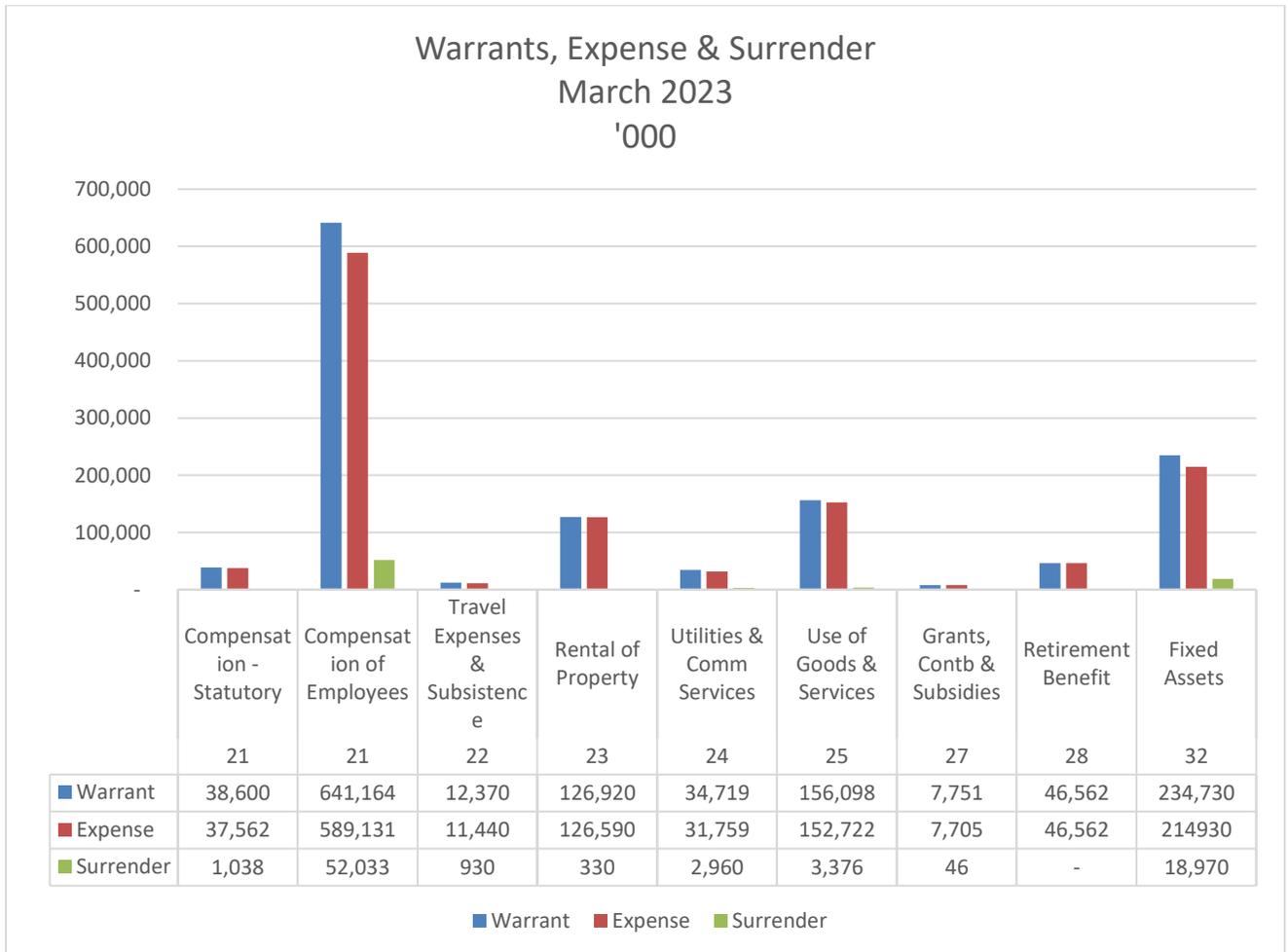


INTEGRITY COMMISSION

Warrant Allocation as at March 2023

The Warrant Allocation, as at March 31, 2023 for recurrent expenditure, was One Billion Two Hundred & Sixty Million, Three Hundred & Fourteen Thousand (\$1,260,314,000) and Statutory Expenditure Estimates of Thirty-Eight Million, Six Hundred Thousand Dollars (\$38,600,000).

At the end of the Fiscal Period ending March 2023, One Billion Two Hundred & Ninety-Eight Million, Nine Hundred & Fourteen Thousand (\$1,298,914,000) was, therefore, authorized by way of warrants to the Commission for Recurrent, Statutory Expenditure and FCDO combined.



Actual Expenditure

At the end of the Fiscal Period ending March 2023, One Billion Two Hundred & Ninety-Eight Million, Nine Hundred & Fourteen Thousand (\$1,218,401,000), including Forty Million, Five Hundred & Seventy One Thousand, Nine Hundred & Ninety Eight Dollars (\$40,571,998) of FCDO funding was spent.

The foregoing Financial Data are based on and accord with the Commission's Consolidated Fund Accounting, which is a requirement of entities that are funded from that Fund.

The Audited Financial Reports of the Commission, which are appended to this Report, are prepared under International Financial Accounting Standards (IFRS) in accordance with the requirements of the Integrity Commission Act. The main difference is that IFRS requires income and expenditure to be accrued, whereas the Consolidated fund accounting generally accounts for cash received and disbursed. There are also important differences in the accounting for and measurement of assets that are recorded under IFRS.

MEMORANDUM OF UNDERSTANDING WITH THE FOREIGN, COMMONWEALTH AND DEVELOPMENT OFFICE (FCDO)

The Commission, on July 7, 2020, submitted a proposal for the "Integrity Commission DFID Support: Needs Assessment & Plan" to the then Department for International Development (DFID), in an effort to obtain funding support for certain projects and items critical to its effective operations. DFID merged with the Foreign and Commonwealth Office (FCO) and became the Foreign, Commonwealth and Development Office (FCDO), with effect from September 2, 2020. Subsequently, the Government of Jamaica, entered into a Memorandum of Understanding (MOU) with the FCDO in October 2020, to provide capacity building support to the Integrity Commission, under its Serious Organized Crime and Anti-Corruption Programme (SOCAP). The period of the MOU is October 26, 2020 through to March 31, 2023, this agreement was further extended to March 31st, 2025.

FCDO Funding 2022-2023

A total of Three Hundred and Fifty Thousand Pounds (£350,000.00) was committed to assist with the effort of fighting corruption in the society.

Total expenditure for the financial year was Two Hundred & Twenty-Seven Thousand, Five Hundred and Twelve Pounds and Thirty-Three Pence (£227,512.33), which provided needed resources. These included training in "Go-case", a Case Management System, Equipment for the outfitting of Interview Rooms, CaseWare Cloud solution as well as providing training and access to the Software.

Chapter 13 - Recommendations for Legislative Amendments and Best Practices

Recommendations Under Consideration

The Integrity Commission, pursuant to Section 60(2), and Section 4 of the Second Schedule, of the Integrity Commission Act, 2017, has made numerous recommendations in its four (4) preceding Annual Reports which were submitted to the Houses of Parliament.

The recommendations are currently being considered by the Joint Select Committee of Parliament which was established to “*review and report*” on the Integrity Commission Act, 2017. Several sittings of the Committee were held during the Financial Year, during which time, the Integrity Commission and other stakeholders were given an opportunity to elaborate on the respective submissions.

The recommendations which have been made by the Commission, over the requisite period, and which are under the consideration of the Joint Select Committee, falls within the following main thematic areas:

1. Staggering and Transitional Arrangements of Board Membership
2. Termination of the Appointment of a Commissioner
3. Examination and Completeness of Statutory Declarations
4. Disclosure of Registrable Interests
5. Gifts to Parliamentarians/Public Officials from Relatives
6. Offence For Misleading, Obstructing Or Non-Compliance With Request From The Director Of Investigation
7. Review of Obligation Not To Announce Or Comment On Investigations
8. Actions Of The Commission Not Void For Want Of Form
9. Regulations to the Integrity Commission Act
10. Review of Obligation To Keep Certain Matters, Documentation and Information Secret and Confidential
11. Duty Of Public Officials To Report Act Of Corruption
12. Correction of Observed Typographical Errors in the Integrity Commission Act.

The verbatim recommendations and submissions which were made to the Houses of Parliament and the Joint Select Committee can be reviewed in the Commission’s 4th Annual Report (2021/2022 – Pgs.21-39) which is accessible via: -

https://integrity.gov.jm/sites/default/files/annual_report/IC%20Annual%20Report%20for%20the%20FY%202021-2022.pdf

In addition to the recommendations which have been posited by the Integrity Commission, it is a matter of public record that submissions were also made to the Joint Select Committee, by the following organisations/entities, in relation to a review of the Integrity Commission Act:

1. Jamaicans for Justice
2. Jamaica LANDS
3. Ministry of Finance and the Public Service – Financial Investigations Division
4. The Morning Collection
5. Norman Manley Law School
6. Private Sector Organisation of Jamaica
7. National Integrity Action
8. Jamaica Accountability Meter Portal

INTEGRITY COMMISSION

Further recommendations were also made by The Honourable Everald Warmington, CD,MP, to the Joint Select Committee of Parliament during a sitting on March 22, 2023.

The Commission awaits the deliberations and/or recommendations of the Joint Select Committee in keeping with its mandate to review the Integrity Commission Act, 2017, pursuant to Section 60 of the referenced Act.

New Recommendations FY 2022/2023

Pursuant to Section 60(2), and Section 4 of the Second Schedule, of the Integrity Commission Act, 2017, the Integrity Commission makes the following recommendations for amendments to Legislation and Best Practices.

A. RECOMMENDATIONS FOR PROPOSED LEGISLATIVE AMENDMENTS TO THE INTEGRITY COMMISSION ACT, 2017

No.	Legislation	Current Provision	Recommended Changes
1	Integrity Commission Act	<p><u>Section 43 ICA</u>: <i>The provision of false information/responses to the Director of Information and Complaints should be a criminal offence similar to the provision of false information on a statutory declaration:</i></p> <p><i>- A declarant should not be able to provide false information/responses to the Director, if said information will be used as a basis to certify a statutory declaration."</i></p>	The referenced matter could be addressed by amending Section 43(2)(a) to state; "...knowingly makes a false statement in a statutory declaration or to the Director of Information and Complaints
2	Integrity Commission Act	<p>Section 43 (2) (a)</p> <p>"A person who knowingly makes a false statement in a statutory declaration commits an offence and is liable on summary conviction in a Parish Court to a fine not exceeding two million dollars, or to a term of imprisonment not exceeding two years and the court may make such order it thinks fit."</p>	<p>The amendment to section 43(2)(a) of the ICA is to add specific provisions to address various forms of false statements made in a Statutory Declaration. It is recommended to include three categories:</p> <p>(i) Failure to disclose a material fact;</p> <p>(ii) Misrepresentation; and</p> <p>(iii) Providing misleading information.</p>

INTEGRITY COMMISSION

No.	Legislation	Current Provision	Recommended Changes
3			If a person, therefore, knowingly makes a false statement in a Statutory Declaration falling under any of these categories, they commit an offence.
	Integrity Commission Act	<p>Fines – section 43 (1) - Maximum of Five hundred thousand- or six-months imprisonment.</p> <p>Fixed Penalty for Discharge Liability – Two hundred and fifty thousand dollars</p>	<ul style="list-style-type: none"> • Reduce the fixed penalty for the Discharge Liability Notice. • Include a minimum fine equivalent to Discharge Liability Notice for offences under section 43(1). • Include stricter penalties for repeat offenders.
4	Integrity Commission Act	No existing provision, though previously legislated under the <i>Contractor General Act</i>	A section to be inserted [possibly below section 43(1)] that makes provision for an offence if a person, without lawful justification or excuse, obstructs, hinders, or resists the Commission in carrying out its functions under the <i>Integrity Commission Act</i> , or if they fail to comply with any lawful requirement of the Commission in accordance with the <i>Integrity Commission Act</i> or any other enactment.

Recommendations Arising From Completed Reports of Investigations

During the course of the financial year, the Director of Investigation made several recommendations in keeping with Section 54 of the Integrity Commission Act towards improving public procurement and contract administration, as well as improving systems of governance and eradicating corruption enabling devices.

The following recommendations and anti-corruption initiatives were made to Competent Authorities and other germane Ministries, Departments and Agencies:

- a) The Director of Investigation recommended that Members of Parliament refrain from making recommendations for the award of contracts to employees, political party affiliates and/or operatives, business associates and personal friends, in an effort to avoid even the slightest perception of political bias, conflict of interest and/or favouritism, especially in the absence of disclosures regarding the specific nature of the relationship to Implementing Agencies.
- b) The Director of Investigation recommended that in circumstances where a GOJ Development Project permits the receipt of recommendations from a Member of Parliament and/or Minister of Government for the engagement of contractors, the suitability of the recommended contractors should be, at a minimum, independently vetted by the Procuring/Implementing Public Body.
- c) The Director of Investigation recommended that an accountability framework or guidelines should be developed for public officers who are involved in the approval and monitoring of building applications and permits, with an inclusion of specific and appropriate sanctions for public officers who are either complicit or negligent in their lawful responsibilities and who do not exercise due care in enforcing the sanctions for breaches associated with building permits or development orders.
- d) The Director of Investigation recommended that Ministers of Government be instructed to desist from accepting personal benefits from programmes implemented by agencies for which they have Ministerial responsibility or otherwise. The acceptance of such benefits creates an actual conflict of interest which undermines public trust in the fair and objective operation of agencies of the Government.
- e) The Director of Investigation recommended that legislation be introduced which prohibits the acceptance of benefits from resources over which a Minister of Government or other Public Official has charge. Such prohibition should be accompanied by pecuniary and/or punitive sanctions sufficient to deter this practice and punish the offenders where it occurs.
- f) The Director of Investigation recommended that the Education Regulations 1980, be revised to include strict guidelines regarding the management, disclosure and avoidance of conflicts of interest in the acceptance of recommendations for individuals to be appointed to School Boards.
- g) The Director of Investigation recommended that the National Council on Education and/or the Ministry of Education, Youth and Information implement and promote a merit based system by which a qualified person may apply for and be appointed to serve on School Boards and to further receive the necessary training, in an effort to reduce the politicization of the process and to minimize the appearance of nepotism and conflicts of interest, which threaten the integrity of the appointment process and by extension, the governance of the public entities involved.

INTEGRITY COMMISSION

- h) The Director of Investigation recommended that Members of Parliament refrain from operating constituency offices or other politically affiliated offices within community centres and similar spaces, designated specifically for non-partisan public use and access, in an effort to ensure that Government owned properties designed for the benefit of all citizens, maintain the appearance of impartiality and independence, while safeguarding the principle of free and unfettered access for all, irrespective of political affiliation.
- i) The Director of Investigation recommended that Procuring Entities should make every effort to ensure that unsuccessful bidders are notified of the result of their respective bid submissions for each procurement opportunity, in line with Appendix A8.17 (d) of the Government of Jamaica Handbook of Public Sector Procurement Procedures, in an effort to promote transparency in the bidder selection process.
- j) In an effort to decrease the perception of improper utilization of the Direct Contracting procurement methodology, the Director of Investigation recommended that the Bethlehem Moravian College practices adequate procurement planning, particularly in relation to the need for infrastructure upgrade and maintenance, thereby ensuring that there is sufficient time to procure services, works and/or goods, consistent with Appendix 1 Volume II of the Government of Jamaica Handbook of Public Procurement Procedures.
- k) The Director of Investigation recommended that the Chief Public Procurement Officer in the Ministry of Finance and the Public Service, give due consideration to the development of standardized Value for Money criteria geared at aiding Public Bodies in, amongst other things, ensuring that value for money is achieved in public sector procurement.
- l) The Director of Investigation recommended that the Spanish Town High School take reasonable steps to ensure that mechanisms are implemented to guard against persons acting in overlapping roles which may give rise to inappropriate conduct. Further and more specifically, the DI recommended that the Spanish Town High School immediately desists from facilitating circumstances where a Board member intervenes inappropriately in the Procurement and Financial administration process irrespective of whether the services provided are voluntary or otherwise.
- m) The Director of Investigation recommended that public bodies should, in keeping with the stipulated procurement guidelines, establish robust and transparent systems and processes to ensure that the processes for the award of contracts are free from bias and corruption, whether real or perceived.
- n) The Director of Investigation recommended that in circumstances where a public body has identified that there is a breach of the procurement procedures, the responsible entity should seek to remedy the said breach in an expeditious and effective manner as opposed to continuing with the implementation of the project in violation of the applicable Government of Jamaica public sector procurement procedures, the attendant Regulations and other governing laws.

Chapter 14 - Audited Financial Statements

INTEGRITY COMMISSION
FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2023



INTEGRITY COMMISSION

**FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2023**

CONTENTS

	Page(s)
Independent Auditor's Report	1 - 3
Statement of Financial Position	4
Statement of Comprehensive Income	5
Statement of Changes in Reserves	6
Statement of Cash Flows	7
Notes to the Financial Statements	8-29



10 Holborn Road, Kgn. 5, Ja., W.I.

Tel: (876) 926-4546, 926-6310, 631-8533 - Cell: (876) 386-2618

TeleFax: (876) 631-7555 - E-mail: crhylton@yahoo.com



Independent Auditor's Report

To the members of Integrity Commission

Report on the Audit of the Financial Statements

Opinion

We have audited the accompanying financial statements of the Integrity Commission (the "Commission"), which comprise the statement of financial position as at March 31, 2023, the statement of comprehensive income, the statement of changes in reserves, the statement of cash flows for the year then ended and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements give a true and fair view of the financial position of the Commission as at March 31, 2023, and of its financial performance and cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRS).

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Commission in accordance with the International Ethics Standards Board for Accountants Code of Ethics for Professional Accountants including International Independence Standards (IESBA Code) and we have fulfilled our other ethical responsibilities in accordance with the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Emphasis of matter

We draw attention to Note 2.1 to the financial statements, which discloses that the Commission reported under IFRS for the current year and IFRS and IPSAS for the previous year. There was no material impact on the financial statements arising from that change. Our opinion is not modified in respect of this matter.

Responsibilities of management and those charged with governance for the Financial Statements

Management is responsible for the preparation of financial statements that give a true and fair view in accordance with IFRS and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Commission's ability to continue as a going concern, disclosing as applicable, matters related to going concern and using the going concern basis of accounting unless management intends to liquidate the Commission or to cease operations, or has no realistic alternative but to do so.

The Commissioners are responsible for overseeing the Commission's financial reporting process.

Independent Auditor's Report (cont'd)

To the members of Integrity Commission

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Commission's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Commission's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Commission to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that presents a true and fair view.

We communicated with management regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Other Matter

The financial statements of the Fund for the financial year ended 31 March 2022 were audited by another auditor who expressed an unmodified opinion on those financial statements on 21 June 2022.



Chartered Accountants
June 27, 2023

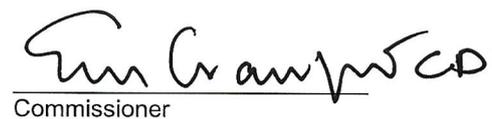
INTEGRITY COMMISSION

**STATEMENT OF FINANCIAL POSITION
AS AT MARCH 31, 2023**

	Note	2023 \$	2022 \$
ASSETS			
Non-current Assets			
Plant and equipment	9	268,076,208	107,045,098
Right-of-use assets	15	616,600,016	18,504,557
Intangible assets	10	27,048,370	24,065,118
Long-term receivables	11	-	1,113,008
		<u>911,724,594</u>	<u>150,727,781</u>
Current Assets			
Current portion of long-term receivables	11	413,316	635,090
Prepayments and deposits	12	46,933,304	70,752,499
Cash and bank balances	13	65,553,750	38,567,390
		<u>112,900,370</u>	<u>109,954,979</u>
TOTAL ASSETS		<u>1,024,624,964</u>	<u>260,682,760</u>
RESERVES AND LIABILITIES			
Reserves			
Transferred assets	14	-	-
Accumulated surplus		2,188,123	51,080,149
		<u>2,188,123</u>	<u>51,080,149</u>
Non-current Liabilities			
Lease liabilities	15	617,534,343	-
Deferred income	16	284,990,721	151,496,002
		<u>902,525,064</u>	<u>151,496,002</u>
Current Liabilities			
Current portion of lease liabilities	15	58,978,394	23,607,726
Payables and accruals	17	52,211,342	24,720,181
Due to consolidated fund	18	8,722,041	9,778,702
		<u>119,911,777</u>	<u>58,106,609</u>
TOTAL RESERVES AND LIABILITIES		<u>1,024,624,964</u>	<u>260,682,760</u>

Approved, on behalf of the Commission on June 27, 2023 and signed on its behalf by:


Chairman


Commissioner


Executive Director

The accompanying notes form an integral part of the financial statements.

INTEGRITY COMMISSION

STATEMENT OF COMPREHENSIVE INCOME YEAR ENDED MARCH 31, 2023

		2023	Restated*
	Note	\$	2022
			\$
Subvention	4	1,004,651,357	702,492,788
Grant income	7	<u>50,652,092</u>	<u>23,608,000</u>
		1,055,303,449	726,100,788
Administrative and general expenses	5	(961,535,685)	(673,231,676)
Direct expenses of Grant	7	(26,704,270)	(18,654,229)
Interest income		<u>95,588</u>	<u>144,486</u>
Surplus before depreciation, amortisation & finance charges		67,159,082	34,359,369
Depreciation and amortization of assets	9,10,15	(132,429,934)	(86,257,295)
Deferred income amortised	16	53,551,356	58,737,204
Finance cost	8, 15	<u>(37,172,530)</u>	<u>(612,608)</u>
Net (deficit) surplus for the year, being total comprehensive (loss) income	19	<u>(48,892,026)</u>	<u>6,226,670</u>

* Restated to agree with current year presentation.

The accompanying notes form an integral part of the financial statements.

INTEGRITY COMMISSION**STATEMENT OF CHANGES IN RESERVES
YEAR ENDED MARCH 31, 2023**

	Transferred Assets \$	Accumulated Surplus \$	Total \$
Balance at April 1, 2021	2,033,606	44,853,479	46,887,085
Depreciation charge on legacy assets	(2,033,606)	-	(2,033,606)
Net surplus, being total comprehensive income for the year	-	6,226,670	6,226,670
Balance at March 31, 2022	-	51,080,149	51,080,149
Net deficit, being total comprehensive loss for the year	-	(48,892,026)	(48,892,026)
Balance at March 31, 2023	-	2,188,123	2,188,123

The accompanying notes form an integral part of the financial statements.

INTEGRITY COMMISSION

**STATEMENT OF CASH FLOWS
YEAR ENDED MARCH 31, 2023**

	Note	2023 \$	2022 \$
CASH FLOWS FROM OPERATING ACTIVITIES			
Net (deficit) surplus for the year		(48,892,026)	6,226,670
Adjustments for items not affecting cash resources:			
Lease interest expense	8	39,515,551	3,050,657
Foreign exchange gain	8	(2,343,021)	-
Depreciation charge on right-of-use asset	15	78,878,578	27,520,091
Depreciation on plant and equipment	9	38,408,893	44,786,319
Amortisation charge on intangible assets	10	15,142,463	13,950,885
Deferred income amortised	16	<u>(53,551,356)</u>	<u>(58,737,204)</u>
		67,159,082	36,797,418
Decrease/(Increase) in operating assets:			
Long-term receivables		1,334,782	491,717
Prepayments and deposits		23,819,195	(30,334,695)
Increase/(Decrease) in operating liabilities:			
Payables and accruals		27,491,161	11,810,945
Due to consolidated fund		<u>(1,056,661)</u>	<u>3,648,876</u>
Net cash provided by operating activities		<u>118,747,559</u>	<u>22,414,261</u>
CASH FLOWS FROM INVESTING ACTIVITIES			
Acquisition of plant and equipment	9	(199,440,003)	(55,621,203)
Acquisition of intangible asset	10	<u>(18,125,715)</u>	<u>(33,537,314)</u>
Net cash used in investing activities		<u>(217,565,718)</u>	<u>(89,158,517)</u>
CASH FLOWS FROM FINANCING ACTIVITIES			
Lease payments		(63,584,577)	(33,417,815)
Deferred income	16	<u>187,046,075</u>	<u>103,162,721</u>
Net cash provided by financing activities		<u>123,461,498</u>	<u>69,744,906</u>
Increase in cash and cash equivalents		24,643,339	3,000,650
Cash and cash equivalents at beginning of year		38,567,390	35,566,740
Effect of exchange rate movement on cash and cash equivalents		<u>2,343,021</u>	<u>-</u>
CASH AND CASH EQUIVALENTS AT END OF YEAR	13	<u><u>65,553,750</u></u>	<u><u>38,567,390</u></u>

The accompanying notes form an integral part of the financial statements.

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS YEAR ENDED MARCH 31, 2023

1. IDENTIFICATION

The Integrity Commission (the "Commission") was established under the Integrity Commission Act (2017) (the "Act"). The Commission is domiciled in Jamaica.

Among the objects and functions of the Commission are:

- (a) To promote and strengthen measures for the prevention, detection, investigation and prosecution of acts of corruption;
- (b) To ensure that government contracts are awarded, varied, renewed or terminated impartially, on merit and in a financially prudent manner;
- (c) To examine the practices and procedures of public bodies and make recommendations, in relation to the revision of those practices and procedures, which in the opinion of the Commission may reduce the likelihood or the occurrence of acts of corruption;
- (d) To prepare codes of conduct and other advisory material relating to corruption and guide public bodies in respect of matters within the purview of this Act;
- (e) To monitor current legislative and administrative practices in the fight against corruption;
- (f) To adopt and strengthen mechanisms for educating the public in matters relating to corruption; and
- (g) To compile and publish statistics relating to the investigation, prosecution and conviction of offences relating to acts of corruption.

2. STATEMENT OF COMPLIANCE AND BASIS OF PREPARATION

2.1 Statement of Compliance

The Commission's financial statements have been prepared in accordance and comply with International Financial Reporting Standards (IFRS), (2022: IFRS and IPSAS) and their interpretations issued by the International Accounting Standards Board and the relevant requirements of the Acts. There was no material impact on the Financial Statements arising from that change.

The financial statements have been prepared under the historical cost basis and are expressed in Jamaican dollars, unless otherwise indicated.

The preparation of financial statements in conformity with IFRS requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses for the year then ended. Actual results could differ from these estimates.

The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period in which the estimate is revised, if the revision affects only that period, or in the period of revision and future periods, if the revision affects both current and future periods.

There are no significant assumptions and judgements applied in these financial statements that carry a risk of material adjustment in the next financial year.

2. STATEMENT OF COMPLIANCE AND BASIS OF PREPARATION (CONT'D)

2.2 Amendments to IFRS that are mandatorily effective for the current year

In the current year the Commission has applied a number of amendments to IFRS issued by the International Accounting Standards Board (IASB) that are mandatorily effective for the accounting period that begins on or after 1 January 2022.

The application of these amendments has not had any impact on the amounts reported or the presentation and disclosures in these financial statements but may impact the accounting for future transactions and arrangements.

		Effective for annual periods beginning on or after
<u>Amendments to Standards</u>		
IAS 16	<i>Property, Plant and Equipment</i> - Amendments prohibiting deducting from cost of an item of PP&E, the proceeds from selling items produced while the entity is preparing the asset for its intended use.	January 1, 2022
IAS 37	<i>Provisions, Contingent Liabilities and Contingent Assets</i> - Amendments regarding the cost to include when assessing whether a contract is onerous.	January 1, 2022
IFRS 3	<i>Business Combinations</i> - Amendments updating an outdated reference to the <i>Conceptual Framework</i> in IFRS3 without significantly changing the requirements of the standard.	January 1, 2022
IFRS 16	<i>Leases</i> - Amendment extending by 1 year the May 2020 amendment providing lessees with an exemption for assessing whether a COVID-19-related rent concession is a lease modification.	April 1, 2021
IFRS 1, 9, 16, IAS 41	<i>First Time Adoption of IFRS; Financial Instruments; Leases; Agriculture</i> - Amendments arising from 2018 – 2020 Annual Improvements to IFRS • Amendment permitting a subsidiary that applies IFRS1 paragraph D 16(a) of IFRS 1 to measure cumulative translation differences using the amounts reported by its parents, based on the parent's date of transition to IFRS.	January 1, 2022

2. STATEMENT OF COMPLIANCE AND BASIS OF PREPARATION (CONT'D)

2.2 Amendments to IFRS that are mandatorily effective for the current year (cont'd)

<u>Amendments to Standards</u>	Effective for annual periods <u>beginning on or after</u>
IFRS 1, 9, 16, IAS 41 <i>First Time Adoption of IFRS; Financial Instruments; Leases; Agriculture (cont'd)</i> <ul style="list-style-type: none"> • Amendment clarifying which fees an entity (as borrower) includes when it applies the 10% test in paragraph B3.3.6 of IFRS 9 in assessing whether to derecognise a financial liability. Only fees paid or received between borrower and lender or on their behalf is included. • Amendment to the illustrative example 13 accompanying IFRS 16 to resolve any potential confusion regarding the treatment of lease incentives that might arise because of how it is illustrated in that example. • Amendment removing the requirement in paragraph 22 of the standard for entities to exclude taxation cash flows when measuring the fair value of a biological asset using a present value technique. 	

2.3 New and revised IFRS in issue but not yet effective

At the date of authorisation of these financial statements, the following Standards, Interpretations and amendments thereto were in issue but were not effective or early adopted for the financial period being reported on:

<u>New Standards</u>	Effective for annual periods <u>beginning on or after</u>
IFRS 17 Insurance Contracts <ul style="list-style-type: none"> - Amendments to address concerns and implementation challenges that were identified after IFRS 17 was published. - Amendment permitting entities that first apply IFRS 17 and IFRS 9 at the same time to present comparative information about a financial asset as if the classification and measurement requirements of IFRS 9 had been applied previously to that financial asset. 	January 1, 2023 January 1, 2023 When IFRS 17 is first applied
<u>Revised Standards</u> IFRS 4 Insurance Contracts <ul style="list-style-type: none"> - The amendment changes the fixed expiry date for the temporary exemption in IFRS 4 from applying IFRS 9 to annual periods beginning on or after January 1, 2023. 	January 1, 2023

2. STATEMENT OF COMPLIANCE AND BASIS OF PREPARATION (CONT'D)

2.3 New and revised IFRS in issue but not yet effective (cont'd)

<u>Revised Standards</u> (cont'd)	<u>Effective for annual periods beginning on or after</u>
IFRS 16 Leases	
- Lease liability in a sale and leaseback: Amendment clarifying how a seller-lessee subsequently measures sale and leaseback transactions that satisfy the requirements in IFRS 15 (Revenue from Contracts with Customers) to be accounted for as a sale.	January 1, 2024
IAS 1 Presentation of Financial statements	
- January 2020 amendments regarding the classification of liabilities as current or non-current.	January 1, 2024
- October 2022 amendment deferring the effective date for the January 2020 amendments by 1 year to January 1, 2024.	
- Non-current liabilities with covenants: Amendment clarifying how conditions with which an entity must comply within twelve months after the reporting period affect the classification of a liability.	January 1, 2024
IAS 1 and IFRS Practice Statement 2	
- Amendments regarding the disclosure of accounting policies.	January 1, 2023
IAS 8 Accounting Policies, Changes in Accounting Estimates and Errors	
- Amendments regarding the definition of accounting estimate.	January 1, 2023
IAS 12 Income Taxes	
- Amendments clarifying that the initial recognition exemption does not apply to transactions in which equal amounts of deductible and taxable temporary differences arise on initial recognition.	January 1, 2023

New and Revised Standards and Interpretations in issue not yet effective that are relevant

The Commission has assessed the impact of all the new and revised Standards and Interpretations in issue not yet effective and has concluded that the following are relevant to the operations of the Commission:

• **Amendments to IAS 1: *Classification of Liabilities as Current or Non-current***

In January 2020 and October 2022, the IASB issued amendments to IAS 1 to specify the requirements for classifying liabilities as current or non-current. The amendments clarify:

- What is meant by a right to defer settlement
- That a right to defer must exist at the end of the reporting period
- That classification is unaffected by the likelihood that an entity will exercise its deferral right
- That only if an embedded derivative in a convertible liability is itself an equity instrument would the terms of a liability not impact its classification
- Disclosures

2. STATEMENT OF COMPLIANCE AND BASIS OF PREPARATION (CONT'D)

2.3 New and revised IFRS in issue but not yet effective (cont'd)

New and Revised Standards and Interpretations in issue not yet effective that are relevant (cont'd)

The amendments are effective for annual reporting periods beginning on or after January 1, 2024 and must be applied prospectively.

The Commission is currently assessing the impact the amendments will have on current practice.

- **Amendments to IAS 1: Disclosure of Accounting Policies**

In February 2021, the IASB issued amendments to IAS1 and *IFRS Practice Statement 2 Making Materiality Judgements* with the aim of assisting entities to provide accounting policy disclosures that are more useful by:

- (1) Replacing the requirement to disclose '*significant*' accounting policies with a requirement to disclose '*material*' accounting policies.
- (2) Adding guidance on how to apply the concept of materiality in making decisions about accounting policy disclosures.

Guidance and examples are provided to assist the process of application. Entities will need to consider the size of transactions, other events or conditions and their nature in making the assessment.

The amendments may impact the accounting policy disclosures of entities as judgment is required to determine if accounting policy disclosures are material or not. Careful consideration will have to be given to standardized information or those that only duplicate or summarises the requirements of IFRSs in deciding whether to remove or retain these as material in enhancing the usefulness of the financial statements.

The amendments are effective for annual reporting period beginning on or after January 1, 2023.

The Commission has not yet performed a detailed review of its accounting policies in light of the amendments. The amendments will be applied by the effective date.

- **Amendments to IAS 8: Definition of Accounting Estimates**

In February 2021, the IASB issued amendments to IAS 8 introducing a new definition of accounting estimates. The amendment clarifies the distinction between changes in accounting estimates, changes in accounting policy and the correction of errors. Clarification is also given on how entities use measurement techniques and inputs to develop accounting estimates.

Under the new definition, accounting estimates are "monetary amounts in financial statements that are subject to measurement uncertainty". Entities develop accounting estimates if accounting policies require items in financial statements to be measured in a way that involves measurement uncertainty.

The amendments clarify that a change in an input or measurement technique that effect an estimate are changes in accounting estimates if they do not result from correction of prior period errors. Changes in accounting estimates resulting from new information or new developments are not corrections of error as in the previous definition. The amendments include two illustrative examples to assist entities understand how to apply the new definition.

2. STATEMENT OF COMPLIANCE AND BASIS OF PREPARATION (CONT'D)

2.3 New and revised IFRS in issue but not yet effective (cont'd)

New and Revised Standards and Interpretations in issue not yet effective that are relevant (cont'd)

The amendments apply to changes in accounting policies and changes in accounting estimates and are effective for annual reporting period beginning on or after January 1, 2023.

The amendments are not expected to have a material impact on the Commission's financial statement.

2.4 Use of estimates and judgements:

The preparation of the financial statements in conformity with IPSAS, IFRS and the Acts, requires management to make judgements, estimates and assumptions that affect the application of policies and the reported amounts of, and disclosures related to, assets, liabilities, contingent assets and contingent liabilities at the reporting date and the income and expenses for the period then ended.

Actual amounts could differ from these estimates.

The estimates and associated assumptions are based on historical experience and/or various other factors that are believed to be reasonable under the circumstances, the results of which form the basis of making the judgements about carrying values of assets and liabilities that are not readily apparent from other sources.

Critical judgements in applying the Commission's accounting policies:

Critical judgements used in applying the Commission's accounting policies that have a significant risk of material adjustment in the next financial year relate to the estimated useful lives and residual values of plant and equipment, leases and other post-employment benefits.

a) *Depreciable assets*

Estimates of the useful life and the residual value of plant and equipment are required in order to apply an adequate rate of transferring the economic benefits embodied in these assets in the relevant periods. The Commission applies a variety of methods in an effort to arrive at these estimates from which actual results may vary. Actual variations in estimated useful lives and residual values are reflected in profit or loss through impairment or adjusted depreciation provisions.

b) *Leases - estimating the incremental borrowing rate*

If the Commission cannot readily determine the interest rate implicit in the lease, it uses its incremental borrowing rate (IBR) to measure lease liabilities. The IBR is the rate of interest that the Commission would have to pay to borrow over a similar term, and with a similar security, the funds necessary to obtain an asset of a similar value to the right-of-use asset in a similar economic environment. The IBR therefore reflects what the Commission 'would have to pay', which requires estimation when no observable rates are available or when they need to be adjusted to reflect the terms and conditions of the lease.

The Commission estimates the IBR using observable inputs (such as market interest rates) when available and is required to make certain entity-specific estimates (such as stand-alone credit rating).

3. SIGNIFICANT ACCOUNTING POLICIES

(a) Property and equipment

All property and equipment held for administrative purposes, are recorded at historical or deemed cost, less any subsequent accumulated depreciation and subsequent accumulated impairment losses.

Cost includes expenditure that is directly attributable to the acquisition of the asset. The cost of replacing part of an item of property, plant and equipment is recognized in the carrying amount of the item if it is probable that the future economic benefits embodied in the part will flow to the Commission and its cost can be reliably measured.

The cost of day-to-day servicing of property, plant and equipment is recognized in the statement of comprehensive income as incurred.

Depreciation is calculated on the straight-line basis over the estimated useful lives of such assets. The rates of depreciation in use are:

Computers	25%
Furniture, fixtures & equipment	10%
Motor vehicles	20%
Leasehold improvements	20%
Licenses and software	33.33%

(b) Long-term receivables

Long-term receivables are recognized at amortized cost. Appropriate allowances for estimated irrecoverable amounts are recognized in the statement of financial performance when there is objective evidence that the assets are impaired.

(c) Accounts payable

Accounts payables are stated at amortized cost.

(d) Cash and bank balances

Cash and bank balances comprise cash in hand and cash with banks.

(e) Leases

As lessee

The Commission applies a single recognition and measurement approach for all leases, except for short term leases and leases of low value assets. The Commission recognizes lease obligations as lease liabilities and right-of-use assets representing the right to use the underlying assets.

The Commission recognizes right-of-use assets at the commencement date of the lease (i.e., the date the underlying assets are available for use). The right-of-use assets are measured at cost, less any accumulated depreciation and impairment losses, and adjusted for any remeasurement of lease liabilities. The cost of right-of-use assets includes the amount of the initial lease liabilities recognized, initial direct costs incurred, and lease payments made on or before the commencement date less any lease incentives received. Right-of-use assets are depreciated on a straight-line basis over the shorter of the lease term and the estimated useful lives of the assets.

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS YEAR ENDED MARCH 31, 2023

3. SIGNIFICANT ACCOUNTING POLICIES (CONT'D)

(e) Leases (cont'd)

As lessee (cont'd)

Assets and liabilities arising from a lease are initially measured on a present value basis. Lease liabilities include the net present value of the following lease payments:

- fixed payments (including in-substance fixed payments), less any lease incentives receivable.
- payments of penalties for terminating the lease, if the lease term reflects the Commission exercising that option.

Lease payments to be made under reasonably certain extension options are also included in the measurement of the liability. The lease payments are discounted using the lessee's incremental borrowing rates being the rate that the individual lessee would have to pay to borrow the funds necessary to obtain an asset of similar value to the right-of-use asset in a similar economic environment with similar terms, security and conditions.

(f) Subvention recognition

Income comprises recurrent subvention received from the Government of Jamaica ("GOJ") and interest income. Subvention from GOJ is recognized when it is received while interest income is recognized when it is earned.

(g) Provisions

Provisions are recognized when the Commission has a present legal or constructive obligation as a result of past events and it is probable that an outflow of resources will be required to settle the obligation. Provisions are measured at the management's best estimate of the expenditure required to settle the obligation at the reporting date and are discounted to present value where the effect is material.

(h) Financial instruments

Financial instruments include transactions that give rise to both financial assets and financial liabilities. Financial assets and liabilities are recognised on the Commission's statement of financial position when the Commission becomes a party to the contractual provisions of the instrument.

Financial liabilities and equity instruments issued by the Commission are classified according to the substance of the contractual arrangements entered into and the definitions of a financial liability and an equity instrument. An equity instrument is any contract that evidences a residual interest in the assets of the Commission after deducting all of its liabilities.

Financial assets include cash and bank deposits, accounts receivable, long-term receivables and other current assets except prepayments.

The fair values of the financial instruments are discussed in Note 21.

(i) Comparative information

Where necessary, comparative figures have been reclassified and or restated to conform to changes in the current year.

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS YEAR ENDED MARCH 31, 2023

3. SIGNIFICANT ACCOUNTING POLICIES (CONT'D)

(j) Employee benefits

Employee benefits are all forms of consideration given by the Commission in exchange for service rendered by employees. These include current or short-term benefits such as salaries, statutory contributions, vacation leave, non-monetary benefits such as medical care; post-employment benefits such as pensions; and other long-term employee benefits such as termination benefits.

Employee benefits that are earned as a result of past or current service are recognized in the following manner:

- Short-term employee benefits are recognized as a liability, net of payments made, and charged to expense. The expected cost of vacation leave that accumulates is recognized when the employee becomes entitled to the leave.

(k) Foreign currencies

The financial statements are presented in the currency of the primary economic environment in which the Commission operates (its functional currency).

In preparing the financial statements of the Commission, transactions in currencies other than the Commission's functional currency, the Jamaican dollar, are recorded at the rates of exchange prevailing on the dates of the transactions. At each reporting date, monetary items denominated in foreign currencies are retranslated at the rates prevailing on the reporting date. Non-monetary items that are measured in terms of historical cost in a foreign currency are not retranslated.

Exchange differences arising on the settlement of monetary items and on the retranslation of monetary items, are included in the statement of comprehensive income for the period.

(l) Related party identification

A party is related to the Commission if:

- (i) directly or indirectly the party:
 - controls, is controlled by, or is under common control with the Commission;
 - has an interest in the Commission that gives it significant influence over the Commission; or
 - has joint control over the Commission
- (ii) the party is an associate of the Commission
- (iii) the party is a joint venture in which the Commission is a venturer;
- (iv) the party is a member of the key management personnel of the Commission
- (v) the party is a close member of the family of an individual referred to in (i) or (iv) above
- (vi) the party is an entity that is controlled, jointly controlled or significantly influenced by, or for which significant voting power in such entity resides with, directly or indirectly, any individual referred to in (iv) or (v) above.
- (vii) the party is a post-employment benefit plan for the benefit of employees of the Commission or of any company that is a related party of the Commission.

A related party transaction is a transfer of resources, services or obligations between related parties, regardless of whether a price is charged.

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS YEAR ENDED MARCH 31, 2023

3. SIGNIFICANT ACCOUNTING POLICIES (CONT'D)

(m) Grants

Grants are recognized when there is reasonable assurance that the Commission will comply with the conditions attached to the grants and that the grants will be received.

Grants are recognised in profit or loss on a systematic basis over the periods in which the Commission recognises as expenses the related costs for which the grants are intended to compensate. Specifically, grants whose primary condition is that the Commission should purchase or otherwise acquire noncurrent assets are recognised as deferred income in the statement of financial position and transferred to profit or loss on a systematic and rational basis over the useful lives of the related assets.

4. SUBVENTION

Income represents subvention from the Government of Jamaica from the annual national budget as well as periodic allocations. Total Vote approved by Parliament was \$1,475,946,000 (2022: \$1,057,912,000) and \$38,600,000 (2022: \$38,622,000) for the recurrent and statutory budgets respectively.

The Commission's income is exempt from income tax under section 12(b) of the Income Tax Act.

	2023	2022
	\$	\$
Subvention received	1,257,494,000	914,844,000
Surrendered to the consolidated fund (<i>unused amount</i>)	<u>(79,664,296)</u>	<u>(124,865,491)</u>
	1,177,829,704	789,978,509
Deferred income	<u>(173,178,347)</u>	<u>(87,485,721)</u>
	<u>1,004,651,357</u>	<u>702,492,788</u>

INTEGRITY COMMISSION

**NOTES TO THE FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2023**

5. ADMINISTRATIVE AND GENERAL EXPENSE

	2023	2022
	\$	\$
Staff costs (Note 6)	718,291,561	403,414,679
Legal and professional fees	9,234,798	7,144,037
Computer maintenance and related expenses	17,343,608	11,012,560
Medical supplies	841,762	687,713
Staff welfare	1,724,672	1,353,362
Security	4,983,377	3,516,393
Janitorial	4,633,744	3,159,790
Dues and subscription	923,146	1,751,863
Insurance	2,860,522	2,659,872
Supplies and services	1,902,593	1,315,681
Motor vehicle expense	4,196,761	2,147,292
Travelling and subsistence	11,440,494	83,306,915
Rental of office, parking space, machinery	3,026,124	7,028,990
Maintenance of rental properties and parking lot	50,342,429	38,886,653
Utilities and communication	30,969,735	29,048,801
Repairs and maintenance	4,851,616	473,071
Commissioners' fees	37,327,396	36,956,631
Meals and entertainment	6,289,987	2,595,133
Postage and delivery	337,141	42,890
Printing and stationery	8,335,479	16,727,556
Audit fees	7,154,771	1,101,400
Advertising and promotion	24,504,412	8,913,186
Bank charges	1,500	73,602
Low value assets	5,331,798	5,411,365
Training and workshops	214,072	-
General office expenses	4,472,187	4,502,240
	<u>961,535,685</u>	<u>673,231,676</u>

6. STAFF COSTS

The number of employees at the end of the year was as follows:

	2023	2022
	\$	\$
Temporary	9	8
Permanent	114	110
	<u>123</u>	<u>118</u>

The aggregate payroll costs for these persons were as follows:

	2023	2022
	\$	\$
Salaries, wages and related costs	645,393,576	344,787,811
Gratuity payments	46,656,391	41,999,000
Statutory contributions	26,241,594	16,627,868
	<u>718,291,561</u>	<u>403,414,679</u>

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS YEAR ENDED MARCH 31, 2023

7. GRANT

This represents a grant received from The Government of the United Kingdom of Great Britain and Northern Ireland acting through the Foreign, Commonwealth and Development Office (FCDO). The grant was established by a Memorandum of Understanding (MOU) signed on November 2, 2020 to expire March 31, 2023. The MOU was extended effective as of March 30, 2023 to expire on March 31, 2025.

The total budget for the year is \$82,955,340 (£450,000), (2022: \$73,442,000 (£348,066))

	2023 \$	2022 \$
Grant received	64,519,820	39,285,000
Deferred income included in plant, equipment and intangible additions (Notes 9 & 10))	<u>(13,867,728)</u>	<u>(15,677,000)</u>
	<u>50,652,092</u>	<u>23,608,000</u>
Direct expenses:		
Purchase of goods and services	26,704,270	23,217,999
Consultancy services	<u>-</u>	<u>390,001</u>
	26,704,270	23,608,000
Prepaid expenses	<u>-</u>	<u>(4,953,771)</u>
	<u>26,704,270</u>	<u>18,654,229</u>

8. FINANCE COST

This represents the following:

	2023 \$	2022 \$
Interest expense on long term leases	39,515,551	3,050,657
Foreign currency gain of FDCO grant	<u>(2,343,021)</u>	<u>(2,438,049)</u>
	<u>37,172,530</u>	<u>612,608</u>

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2023

9. PLANT AND EQUIPMENT

	Leasehold Improvement \$	Furniture, Fixtures and Equipment \$	Computers \$	Motor vehicles \$	Total \$
At Cost/Valuation					
Balance at March 31, 2021	3,013,626	51,501,157	129,688,598	43,553,027	227,756,408
Additions	-	8,466,006	47,155,197	-	55,621,203
Balance at March 31, 2022	3,013,626	59,967,163	176,843,795	43,553,027	283,377,611
Additions	-	114,584,876	78,978,159	5,876,968	199,440,003
Balance at March 31, 2023	3,013,626	174,552,039	255,821,954	49,429,995	482,817,614
Accumulated Depreciation:					
Balance at March 31, 2021	3,013,626	31,361,064	70,577,076	24,560,822	129,512,588
Charge for year	-	4,318,621	35,397,206	7,104,098	46,819,925
Balance at March 31, 2022	3,013,626	35,679,685	105,974,282	31,664,920	176,332,513
Charge for year	-	5,582,336	26,493,572	6,332,985	38,408,893
Balance at March 31, 2023	3,013,626	41,262,021	132,467,854	37,997,905	214,741,406
Carrying amount					
At March 31, 2021	-	20,140,093	59,111,522	18,992,205	98,243,820
At March 31, 2022	-	24,287,478	70,869,513	11,888,107	107,045,098
At March 31, 2023	-	133,290,018	123,354,100	11,432,090	268,076,208

	2023 \$	2022 \$
* Depreciation Charge:		
Transferred assets	-	2,033,606
Acquired assets	38,408,892	44,786,319
	<u>38,408,892</u>	<u>46,819,925</u>

Plant and equipment acquired during the year were essentially brought into use near the end of the financial year. Therefore, no depreciation was accounted on the acquisitions.

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS YEAR ENDED MARCH 31, 2023

10. INTANGIBLE ASSETS

Intangible assets represent licenses and software with an estimated useful life of three (3) years.

Intangible assets in the statement of financial position were determined as follows:

	2023	2022
	\$	\$
Balance at the beginning of the year	44,591,056	11,053,742
Additions	<u>18,125,715</u>	<u>33,537,314</u>
	<u>62,716,771</u>	<u>44,591,056</u>
Accumulated Amortisation		
Balance at the beginning of the year	(20,525,938)	(6,575,053)
Current year	<u>(15,142,463)</u>	<u>(13,950,885)</u>
	<u>(35,668,401)</u>	<u>(20,525,938)</u>
Carrying amount	<u><u>27,048,370</u></u>	<u><u>24,065,118</u></u>

Intangible assets acquired during the year were essentially brought into use near the end of the financial year. Therefore, no depreciation was accounted on the acquisitions.

Intangible assets are being amortised at 33 $\frac{1}{3}$ % per annum for the license and software, unless there is significant impairment during the year.

11. LONG-TERM RECEIVABLES

	2023	2022
	\$	\$
Staff loan:		
Long-term	-	1,113,008
Current	<u>413,316</u>	<u>635,090</u>
	<u><u>413,316</u></u>	<u><u>1,748,098</u></u>

The Commission has a motor vehicle revolving loan scheme to assist travelling officers to purchase reliable motor vehicles to be used in the performance of their official duties.

Guidelines for administering the loan include:

- (i) The loan amount for new vehicles should not exceed \$2,500,000 and for used vehicles the amount should not exceed \$1,500,000.
- (ii) An interest rate of 3% on the reducing balance is charged, if loans exceed the minimum amount of \$1,500,000 for new vehicles and \$1,000,000 for used vehicles.
- (iii) Loans should be repaid over a seven (7) year period for new vehicles and six (6) years for used vehicles
- (iv) Only one loan is permitted within a five (5) year period to each employee
- (v) The motor vehicle purchased should not be older than five (5) years
- (vi) All loans should be recovered by salary deduction.

INTEGRITY COMMISSION**NOTES TO THE FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2023****12. PREPAYMENTS AND DEPOSITS**

	2023	2022
	\$	\$
Prepaid rent	-	4,814,745
Prepaid insurance	-	1,163,796
Other prepayments	5,038,164	5,166,980
Security deposit	29,129,100	16,495,775
Deposit on fixed assets	12,766,040	43,111,203
	<u>46,933,304</u>	<u>70,752,499</u>

13. CASH AND BANK BALANCES

Cash and bank balances included in the statement of financial position and statement of cash flows are comprised of the following:

	2023	2022
	\$	\$
Petty cash	200,000	200,000
Cash in J\$ current accounts	7,461,600	6,045,488
Cash in foreign currency account - £288,622 (2022:- £164,248)	57,892,150	32,321,902
	<u>65,553,750</u>	<u>38,567,390</u>

14. TRANSFERRED ASSETS

This represents net assets of the three legacy entities merged. The assets are included in plant and equipment at a carrying amount of \$Nil as at March 31, 2023 (2022: \$Nil).

	2023	2022
	\$	\$
Office of the Contractor General	33,010,640	33,010,640
Commission for the Prevention for Corruption Integrity Commission (Legacy)	(4,702,646)	(4,702,646)
	<u>6,638,916</u>	<u>6,638,916</u>
	<u>34,946,910</u>	<u>34,946,910</u>
Opening balance	-	2,033,606
Current year amortisation	-	(2,033,606)
Closing balance	<u>-</u>	<u>-</u>

INTEGRITY COMMISSION

**NOTES TO THE FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2023**

15. RIGHT-OF-USE ASSETS/LEASE LIABILITIES

Recognised in non-current assets

	2023	2022
	\$	\$
Balance at the beginning of the year	103,940,080	103,940,080
Derecognised	(103,940,080)	-
Additions	676,974,037	-
	<u>676,974,037</u>	<u>103,940,080</u>
Depreciation charge of right-of use assets		
Balance at the beginning of the year	(85,435,523)	(57,915,432)
Charge for the year	(78,878,578)	(27,520,091)
Derecognised	103,940,080	-
	<u>(60,374,021)</u>	<u>(85,435,523)</u>
Carrying amount	<u>616,600,016</u>	<u>18,504,557</u>

Amounts recognised in the statement of comprehensive income

Surplus/(deficit) for the year includes the following amounts relating to leases:

	2023	2022
	\$	\$
Depreciation expense on right-of-use asset	78,878,578	27,520,091
Interest expense on lease liability (note 8)	39,515,551	3,050,657
Expense relating to short term leases	3,026,123	7,028,990

The total cash outflow for leases in 2023 was \$63,971,248 (2022: 33,417,815).

Net debt reconciliation

This section sets out an analysis of net debt and the movements in net debt for each of the years presented.

	2023	2022
	\$	\$
Lease liability		
Net debt as at 1 April	23,607,726	53,974,884
Additional lease obligations	676,974,037	-
Cash flows-		
Lease payments	(63,584,577)	(33,417,815)
Non-cash flows -		
Interest expense	<u>39,515,551</u>	<u>3,050,657</u>
Net debt as at 31 March	<u>676,512,737</u>	<u>23,607,726</u>

INTEGRITY COMMISSION

**NOTES TO THE FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2023**

15. RIGHT-OF-USE ASSETS/LEASE LIABILITIES (CONT'D)

	2023	2022
Maturity Analysis	\$	\$
Year 1	102,175,168	30,829,003
Year 2	109,946,723	-
Year 3	114,617,183	-
Year 4	121,714,067	-
Year 5	116,153,371	-
Over 5 years	306,903,338	-
	<u>871,509,850</u>	<u> </u>
Less unearned interest	<u>(194,997,113)</u>	<u>(7,221,277)</u>
	<u>676,512,737</u>	<u>23,607,726</u>
<i>Analysed as:</i>		
Non-current	617,534,343	-
Current	58,978,394	23,607,726

The Commission contracted three (3) new long term leases as detailed below: The previous three leases brought forward at 1 April 2022 all expired during the year and were on comparable terms to the new leases except for the Sagicor lease which is newly contracted. The Commission was only able to partially occupy the Sagicor lease during the current year due to works being completed by the lessor.

- (i) Thirty-six (36) parking spaces leased from National Water Commission which is located at 18 Oxford Road, Kingston 5. The lease term is for three (3) years commencing on the May 16, 2022 and expires May 15, 2025 with an option to extend.
- (ii) Office space leased from the Free Mason Association (Jamaica) Limited which is located at 45-47 Barbados Avenue, Kingston 5 (2nd Floor). The lease term is for one (1) year commencing on June 1, 2021 and expires May 31, 2022. The lease was not renewed or extended.
- (iii) Office space leased from Planning Institute of Jamaica (PIOJ) which is located at 16 Oxford Road, Kingston 5 (1st Floor). The lease term is for five (5) years commencing on January 1, 2023 and expires December 31, 2028 with an option to renew for a further five (5) years.
- (iv) Office space leased from Sagicor Life Jamaica Limited which is located at 63-67 Knutsford Boulevard, Kingston 5 (Sagicor Sigma Building 3rd to 6th floors). The lease term is for ten (10) years commencing September 1, 2021 and expires August 31, 2031. There is an option to renew the lease for 2 further consecutive terms of five years. The Sagicor lease payment commenced in May 2022, upon the Integrity Commission occupying the 4th floor of the Sagicor building. The monthly lease payment amount was \$1,163,959.38 and this monthly payment continued until January of 2023. The monthly payment for all four (4) floors of \$4,965,174.50 according to the lease agreement, commenced in February 2023, when the 3rd, 5th and 6th floors were ready to be occupied.

The lease agreements do not impose any covenants other than the security interests in the leased asset that is held by the lessor. Leased assets are not used as security for borrowing purposes.

The discount rate used for the new leases added in the year approximate 6.8%.

INTEGRITY COMMISSION**NOTES TO THE FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2023**

16. DEFERRED INCOME

This represents cash received under object thirty-two (32) and assets purchased directly through grant funding to acquire intangible assets, plant and equipment which is subsequently amortised to income over the life of the acquired assets.

	2023	2022
	\$	\$
Opening balance	151,496,002	107,070,485
Assets acquired	187,046,075	103,162,721
Amortization of assets being used	<u>(53,551,356)</u>	<u>(58,737,204)</u>
Closing balance	<u>284,990,721</u>	<u>151,496,002</u>

17. PAYABLES AND ACCRUALS

	2023	2022
	\$	\$
Statutory liabilities	-	195,695
Accrued vacation leave	40,176,409	18,875,404
Accruals	128,400	4,622,341
Other payables	5,006,533	40,341
Accrued audit fees	<u>6,900,000</u>	<u>986,400</u>
Closing balance	<u>52,211,342</u>	<u>24,720,181</u>

18. DUE TO CONSOLIDATED FUND

	2023	2022
	\$	\$
PAYE payable	-	40,277
Education tax payable	-	28,827
General Consumption Tax payable	<u>8,722,041</u>	<u>9,709,598</u>
	<u>8,722,041</u>	<u>9,778,702</u>

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2023

19. RECONCILIATION OF CASH-BASIS TO ACCRUAL BASIS

	<u>2023</u>
Net deficit for the year, being total comprehensive loss	<u>(48,892,026)</u>
Subvention utilised	1,177,829,704
Grant received	<u>64,519,820</u>
Total cash received	1,242,349,524
Cash spent on administrative and general expenses	(1,003,471,042)
Deferred income	<u>(173,178,347)</u>
	<u>(1,176,649,389)</u>
	65,700,135
Accrual-basis adjustments:	
Accrued vacation leave, net	(21,301,005)
Prepayments, net	(23,819,195)
General consumption tax irrecoverable, net	987,557
Lease interest expense	(39,515,551)
Depreciation charge on right-of-use asset	(78,878,578)
Depreciation charge on plant, equipment and intangibles	(53,551,356)
Deferred income amortised	53,551,356
Reversal of rental expense	63,584,577
Bank charges	1,500
Foreign exchange gain	2,343,021
Interest income	95,588
Accruals, net	(3,357,595)
Statutory liabilities	264,799
Other	<u>(1,129,551)</u>
	(100,724,433)
Grant:	
Deferred income	<u>(13,867,728)</u>
	<u>(13,867,728)</u>
	<u>(48,892,026)</u>

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2023

19. RECONCILIATION OF CASH-BASIS TO ACCRUAL BASIS (CONT'D)

	<u>2022</u>
Net surplus for the year, being total comprehensive income	<u>6,226,670</u>
Subvention utilised	789,978,509
Grant received	<u>39,285,000</u>
Total cash received	829,263,509
Cash spent on administrative and general expenses	(726,100,788)
Deferred income	<u>(87,485,721)</u>
	<u>(813,586,509)</u>
	15,677,000
Accrual-basis adjustments:	
Accrued vacation leave, net	10,491,713
Credit card	7,067
Prepayments, net	(4,545,732)
General consumption tax irrecoverable, net	1,770,751
Lease interest expense	3,050,657
Depreciation charge on right-of-use asset	27,520,091
Depreciation charge on plant, equipment and intangibles	58,737,204
Deferred income amortised	(58,737,204)
Reversal of rental expense	(42,729,489)
Bank charges	73,602
Foreign exchange gain	(2,438,049)
Interest income	(144,486)
Accruals, net	1,116,469
Statutory liabilities	264,800
Low value assets	<u>(664,066)</u>
	6,226,670
Grant:	
Deferred income	<u>(15,677,000)</u>
	<u>(15,677,000)</u>
	<u>6,226,670</u>

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS YEAR ENDED MARCH 31, 2023

20. RELATED PARTIES

The Commission's statement of financial performance includes the following transactions, undertaken with related parties in the ordinary course of business:

	2023	2022
	\$	\$
Transactions with Commissioners:		
Commissioners' fees	<u>37,327,396</u>	<u>36,956,631</u>
Remuneration for key management personnel:		
Executive Director	15,258,439	14,428,700
Director, Information and Complaints	12,363,443	10,971,651
Director of Corruption Prosecution	12,591,278	11,516,363
Director of Investigation	12,363,443	11,052,383
Director, Corruption Prevention	12,204,913	-
Director, Corporate Services	7,626,660	5,539,740
Director, Finance and Accounts	7,138,043	1,009,615
Director, Information Systems	10,148,552	3,971,186
Manager, Declaration and Financial Investigations	8,888,375	6,129,646
Manager, Financial Analysis	6,833,774	7,610,874
Employer contribution for personnel	<u>3,960,444</u>	<u>2,167,502</u>
	<u>109,377,364</u>	<u>74,397,660</u>
	<u>146,704,760</u>	<u>111,354,291</u>

21. FINANCIAL INSTRUMENTS

(a) Fair value

Fair value is the amount for which an asset could be exchanged, or a liability settled, between knowledgeable, willing parties in an arm's length transaction. A market price, where an active market (such as a recognized stock exchange) exists, is the best evidence of the fair value of a financial instrument. Market prices are not available for some of the financial assets and liabilities of the Commission. Fair values in the financial statements have therefore been presented using various estimation techniques based on market conditions existing at reporting date.

Generally, considerable judgement is required in interpreting market data to develop estimates of fair value. Accordingly, the estimates presented in these financial statements are not necessarily indicative of the amounts that the Commission would realise in a current market exchange.

The amounts included in the financial statements for cash and bank deposits, receivables and payables, reflect the approximate fair values because of short-term maturity of these instruments.

(b) Financial risk management

The Commission has exposure to the following risks from its use of financial instruments:

- Credit risk
- Liquidity risk
- Market risk
- Cash flow risk

The Commissioners, together with senior management have overall responsibility for the establishment and oversight of the Commission's risk management framework.

INTEGRITY COMMISSION

**NOTES TO THE FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2023**

21. FINANCIAL INSTRUMENTS (CONT'D)

(b) Financial risk management (cont'd)

The Commission's risk management policies are established to identify and analyse the risks faced by the commission in order to set appropriate risk limits and controls, and to monitor risks and adherence to limits. Risk management policies and systems are reviewed regularly to reflect changes in market conditions and the Commission's activities.

(i) Credit risk

Credit risk is the risk that one party to a financial instrument will fail to discharge an obligation and cause the other party to incur a financial loss. The Commission's principal financial assets are cash and bank deposits; and receivables and prepayments.

Cash and bank balances

The credit risk on cash and bank deposits is limited as they are held with financial institutions with high credit rating.

At reporting date, there were no significant concentrations of credit risk and the maximum exposure to credit risk is represented by the carrying amount of each financial asset.

	2023	2022
	\$	\$
Cash and bank balances	<u>65,553,750</u>	<u>38,567,390</u>

(ii) Liquidity risk

Liquidity risk is the risk that the Commission will not meet its financial obligations as they fall due. The Commission's approach to managing liquidity is to ensure, as far as possible, that it will always have sufficient liquidity to meet its liabilities when due, under both normal and stressed conditions, without incurring unacceptable losses or risking damage to the Commission.

The following are the contractual maturities of the non-derivative financial liabilities and excluding the impact of netting agreements.

	Carrying Amount	Contractual Cash flow	Less than 1 year
	\$	\$	\$
March 31, 2023			
Payables and accruals	<u>5,006,533</u>	<u>5,006,533</u>	<u>5,006,533</u>
March 31, 2022			
Payables and accruals	<u>24,720,181</u>	<u>24,720,181</u>	<u>24,720,181</u>

(iii) Market risk

Market risk is the risk that changes in market prices, such as interest rates will affect the Commission's holding of financial instruments. The objective is to manage and control market risk exposures within acceptable parameters, while optimising the return.

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS YEAR ENDED MARCH 31, 2023

21. FINANCIAL INSTRUMENTS (CONT'D)

(b) Financial risk management (cont'd)

(iii) Market risk (cont'd)

Interest rate risk:

Interest rate risk is the risk that the value of a financial instrument will fluctuate due to changes in market interest rates.

Interest-bearing financial assets comprise of bank deposits, which have been contracted at fixed interest rates for the duration of their terms.

Fair value sensitivity analysis for fixed rate instruments

The Commission does not hold any fixed rate financial assets that are subject to material changes in fair value through profit or loss. Therefore, a change in interest rates at the reporting dates would not affect profit or equity.

22. LITIGATIONS

The Commission is a party to various claims and legal actions in the normal course of its activities. Although the ultimate result of legal proceedings cannot be predicted with certainty, it is the opinion of the Commission's management that the outcome of any claim which is pending, either individually or on a combined basis, will not have a material effect on the financial position of the Commission.

At the reporting date and up to the date of these financial statements no matters have been adjudicated or actioned against the Commission, on the advice of its legal representatives that require a provision or disclosure in these financial statements.

Chapter 15 – Appendices

Appendix 1:- Days Taken to Complete the Investigation of Complaints & Referrals

For the financial year 2022/2023, 86 cases were completed by the Investigation Division. The average time taken to complete these cases is 482 days, see the table and graph below for further details:

Days Taken to Complete the Investigation of Complaints & Referrals

#	Date Received/ Commenced	Declarant/Investigation	Employer	Date Investigation was Completed	Days Taken to Complete
1	12/2/2018	(Redacted)	South East Regional Health Authority	3/1/2023	1550
2	12/2/2018	(Redacted)	South East Regional Health Authority	3/1/2023	1550
3	12/2/2018	(Redacted)	South East Regional Health Authority	2/10/2023	1531
4	12/2/2018	(Redacted)	South East Regional Health Authority	2/14/2023	1535
5	12/2/2018	(Redacted)	South East Regional Health Authority	3/1/2023	1550
6	12/2/2018	(Redacted)	South East Regional Health Authority	3/1/2023	1550
7	12/2/2018	(Redacted)	South East Regional Health Authority	1/3/2023	1493
8	1/28/2022	Arthlyn Adams	Transport Authority	5/31/2022	123
9	1/28/2022	Ingrid Allen-Davis	Transport Authority	5/31/2022	123
10	1/28/2022	Marline Bailey-Thompson	Transport Authority	5/31/2022	123
11	1/28/2022	Lelieth Barnes	Transport Authority	5/31/2022	123
12	1/28/2022	Audie Bartley	Transport Authority	8/15/2022	199
13	1/28/2022	Anthony Bloomfield	Transport Authority	8/15/2022	199
14	1/28/2022	Lloyd Bowen	Transport Authority	8/15/2022	199
15	1/28/2022	Craig Brown	Transport Authority	8/15/2022	199
16	1/28/2022	Janet Brown	Transport Authority	5/31/2022	123
17	1/28/2022	Nordia Brown	Transport Authority	5/31/2022	123
18	1/28/2022	Osbourne Brown	Transport Authority	8/15/2022	199
19	1/28/2022	Shelley-Ann Brown	Transport Authority	5/31/2022	123
20	1/28/2022	Andrea Bryan	Transport Authority	5/31/2022	123
21	1/28/2022	Christine Campbell-Buckeridge	Transport Authority	5/31/2022	123
22	1/28/2022	Volit Catnot	Transport Authority	6/9/2022	132
23	1/28/2022	Opal Daley	Transport Authority	5/31/2022	123
24	1/28/2022	Jason Davidson	Transport Authority	6/9/2022	132
25	1/28/2022	Calecia Dobson	Transport Authority	6/9/2022	132
26	1/28/2022	Winston Edwards	Transport Authority	6/9/2022	132
27	1/28/2022	Wayne Emanuel	Transport Authority	8/15/2022	199
28	1/28/2022	Ishmael Francis	Transport Authority	8/15/2022	199
29	1/28/2022	Noel Francis	Transport Authority	6/9/2022	132
30	1/28/2022	Tamisha Frankson	Transport Authority	6/9/2022	132

INTEGRITY COMMISSION

#	Date Received/ Commenced	Declarant/Investigation	Employer	Date Investigation was Completed	Days Taken to Complete
31	1/28/2022	Chevis Gilzeane	Transport Authority	6/9/2022	132
32	1/28/2022	John Greaves	Transport Authority	6/9/2022	132
33	1/28/2022	Sherieffa Gurdon	Transport Authority	6/9/2022	132
34	1/28/2022	Headeann Hall	Transport Authority	6/9/2022	132
35	1/28/2022	Mavreen Hetman	Transport Authority	8/15/2022	199
36	1/28/2022	Rochelle Hird	Transport Authority	6/9/2022	132
37	1/28/2022	Fallon Kelley	Transport Authority	6/9/2022	132
38	1/28/2022	Dawn Lawrence	Transport Authority	6/9/2022	132
39	1/28/2022	Alborn Legg	Transport Authority	8/15/2022	199
40	1/28/2022	Garnett Lester	Transport Authority	6/9/2022	132
41	1/28/2022	Latoya Lindsay	Transport Authority	8/15/2022	199
42	1/28/2022	Kimone May	Transport Authority	8/15/2022	199
43	1/28/2022	Everton McKenley	Transport Authority	8/15/2022	199
44	1/28/2022	Karen McPherson	Transport Authority	8/15/2022	199
45	1/28/2022	Travelle Miller	Transport Authority	6/9/2022	132
46	1/28/2022	Griff Morris	Transport Authority	6/9/2022	132
47	1/28/2022	Pauline Morris	Transport Authority	6/9/2022	132
48	1/28/2022	Winston Morris	Transport Authority	8/15/2022	199
49	1/28/2022	Krista Morrison	Transport Authority	6/9/2022	132
50	1/28/2022	Jodian Nelson-Mitchell	Transport Authority	6/9/2022	132
51	1/28/2022	Faithfulness Odih	Transport Authority	6/9/2022	132
52	1/28/2022	Samantha Pryce	Transport Authority	6/9/2022	132
53	1/28/2022	Jevaughn Robinson	Transport Authority	6/9/2022	132
54	1/28/2022	Catherine Sinclair	Transport Authority	6/9/2022	132
55	1/28/2022	Avery Sommerville	Transport Authority	6/9/2022	132
56	1/28/2022	Sheneisha Sutherland	Transport Authority	6/9/2022	132
57	1/28/2022	Veneita Swaby	Transport Authority	6/9/2022	132
58	1/28/2022	Albert Taylor	Transport Authority	6/9/2022	132
59	1/28/2022	Totlyn Wallace-Palmer	Transport Authority	6/9/2022	132
60	1/28/2022	Nikeita Walters	Transport Authority	6/9/2022	132
61	1/28/2022	Christopher Williams	Transport Authority	8/15/2022	199
62	1/28/2022	Michael Williams	Transport Authority	8/15/2022	199
63	1/28/2022	Terri-Ann Williams	Transport Authority	6/9/2022	132
64	1/28/2022	Heather Williams-Grindley	Transport Authority	6/9/2022	132
65	1/28/2022	Murrine Wilson	Transport Authority	6/9/2022	132
66	1/28/2022	Vivian Young	Transport Authority	6/9/2022	132
67	5/26/2022	Horace Dalley	Houses of Parliament	8/15/2022	81
68	10/5/2022	(Redacted)	Kingston & St. Andrew Municipal Corporation	11/8/2022	34
69	10/31/2018	(Redacted)	Manchester Municipal Council	5/31/2022	1308

INTEGRITY COMMISSION

#	Date Received/ Commenced	Declarant/Investigation	Employer	Date Investigation was Completed	Days Taken to Complete
70	2/2/2021	Lambert Weir	St. Ann Municipal Corporation	10/31/2022	636
71	4/7/2022	(Redacted)	Jamaica Customs Agency	11/22/2022	229
72	2/19/2019	(Redacted)	Houses of Parliament	12/5/2022	1385
73	5/26/2022	(Redacted)	Houses of Parliament	2/28/2023	278
74	5/28/2020	(Redacted)	St. Ann Municipal Council	11/10/2022	896
75	1/22/2018	Special Investigation Concerning Allegations of Favouritism, Conflict of Interest, Impropriety and Irregularity in the award of a contract by the National Works Agency (NWA) under the East Portland Special Mitigation Programme 2017.	N/A	3/23/2021	1156
76	4/7/2015	Special Report of Investigation conducted into the circumstances surrounding the award of contract to Knightsman Security Limited for the provision of security services at the Downtown Kingston Transportation Centre for the period 2010 to 2011	N/A	9/14/2020	1987
77	5/17/2017	Report of Investigation Concerning Allegations of Impropriety and Irregularity in the Award of Contracts, the Issuance of Licences and the Implementation of Projects by the Jamaica Dairy Development Board and/or the Ministry of Industry, Commerce, Agriculture and Fisheries	N/A	6/2/2022	1842
78	1/26/2021	Report of Investigation Concerning Allegations of Nepotism, Conflict of interest, Impropriety and/or Irregularity in relation to Contractors Recommended and Board Appointments made by the Member of Parliament for North Western St. Elizabeth	N/A	9/8/2022	590
79	3/3/2021	Report of Investigation Conducted Pursuant to Section 33 of the Integrity Commission Act Concerning Allegations of Conflict of Interest, Irregularities and/or Impropriety in the Appointment of Mrs. Olive Downer Walsh to the National Board of Directors of the Rural Agricultural Development Authority	N/A	9/2/2022	548
80	1/23/2018	Special Report of Investigation Conducted into Allegations of Irregularity, Conflict of Interest, and Corruption In the Award of Certain Contracts by Petrojam Limited – Petrojam Report No. 3	N/A	12/1/2020	1043
81	3/5/2015	Special Report of Investigation concerning the Circumstances Surrounding the Procurement	N/A	3/18/2021	2205

INTEGRITY COMMISSION

#	Date Received/ Commenced	Declarant/Investigation	Employer	Date Investigation was Completed	Days Taken to Complete
		Process(es) for the Award of Contracts for the Provision of Rosenbauer Fire Trucks (Pumpers) (through the National Safety Limited) by the Jamaica Fire Brigade			
82	4/24/2015	Special Report of Investigation Conducted into Allegations of Conflict of Interest, Irregularity and/or Impropriety in relation to the Construction of Buildings by Mr. Ian Hayles, Member of Parliament for Western Hanover without approval from the Hanover Parish Council	N/A	2/1/2017	649
83	6/12/2020	Report of Investigation Conducted into the Circumstances which led to the Award and Implementation of a Contract, in the Amount of \$46,851,105.30 to Rahim's Cleaning and Trucking Limited, by the St. Ann Municipal Corporation in the Relation to its Ochi Rios Covid-19 Sanitation and Cleaning Project	N/A	2/1/2021	234
84	6/9/2016	Report of Investigation Conducted into the Circumstances Surrounding the Award of Government Contracts to Westcon Construction Limited During the Period 2006 to 2009	N/A	10/4/2022	2308
85	11/23/2016	Report of Investigation - Investigation into the Allegations Concerning Acts of Improprieties in the Procurement Practices at the Bethlehem Moravian College During the Period 2015-2017	N/A	2/7/2023	2267
86	1/3/2017	Report of Investigation - Conducted into the Allegations of Impropriety and Irregularity Surrounding the Award of a Contract Regarding the Provision of Quantity Surveying Services at a Property Located at 4 Windsor Road, St. Ann's Bay.	N/A	2/26/2023	2245
			Total		41450
			Average days Taken		482

* The matters redacted have not been tabled in the Houses of Parliament, up to the time of this Report.

Appendix 2: - Areas of Impact – Contract Monitoring

During the course of the Financial Year, the Division as part of its core functions provided a number of recommendations to Public Bodies in respect of the Procurement Process. These recommendations are summarized below:

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
1	April 5, 2022	National Health Fund (NHF)	Rehabilitation of St. Ann's Bay Regional Hospital Sewage Treatment Plant	The project had to be rescope months after the completion date due to inadequate designing, bill of quantities, administration and execution of the project.	<p>Details of financial implications associated with the inadequate design prepared by the initial project consultant, ASCO Project Consultants Limited and was any damaged charged;</p> <p>Details on the re-scoping of the project, the company tasked with that function and the cost associated; and</p> <p>The impact of having untreated effluent from the hospital been discharged into the river as a result of poor project planning and execution.</p>	By way of letter dated May 25, 2022, 'The deficiencies in the design and the bills of quantities was not ascertained until he project was being implemented. The project is predominantly a rehabilitation project. Hence, there was a lot of unforeseen work that was not fully define during the design stage primary the electrical and mechanical items.'
2	May 18, 2022	University Hospital of the West Indies (UHWI)	Provision of a Project Manager	The Public Body stated that there would be no standstill period.	The Office recommended that for future procurement opportunities the respective clause be amended to include a standstill period in line with the procurement law.	
3	20-Jun-22	Ministry of National Security (MNS)	Procurement of Rugged Handheld Printers and Ruggedized Handset Devices	The points of the Evaluation Criteria being allotted for requirements do not meet for both the technical specifications criterion and the Functionality of devices criterion. Additionally, the assignment of points would not provide a fair assessment of bids.	It was recommended that the Evaluation Criterion should be adjusted and promote objectivity. Additionally the individual points for each specification or a formula should be developed to calculate the score received.	
4	June 22, 2022	Nation Housing Trust (NHT)	Ruthven Road Housing Development Phase 1	The project had achieved Practical Completion however	The Commission refers to an article in <i>Sunday Gleaner</i>	

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
				<p>the NHT was not issue with occupancy certificate form the Jamaica Fire Brigade Department in order for the building to occupied. This was a result of outstanding fire proof doors and alleged structural issues that were noted by the JFBD.</p>	<p>dated Sunday May 29, 2022, titled 'NHT Bungle.' which stated, <i>inter alia</i>, that: ...</p> <p><i>"the National Housing Trust's (NHT) upscale Ruthven Towers development cannot get to move into their new homes because an occupancy certificate is yet to be granted for the complex. The Jamaica Fire Brigade confirmed Friday that there are issues preventing the issuance of the clearance for the 86-unit St. Andrew property to be occupied"</i></p> <p>Subsequently, an article was published in the <i>Monday Gleaner</i> dated June 6, 2022, titled 'NHT denies structural issues at Ruthven Towers, promises fire doors soon' which stated, <i>inter alia</i>, that: ...</p> <p><i>"FIRE DOORS for the National Housing Trust's (NHT) upscale Ruthven Towers complex in St. Andrew are to installed by July, the entity has said, move that could get the Jamaica Brigade (JFB) closer to giving the okay for the building to be occupied."</i></p> <p>Further to this, the Commission is requesting the following information/ documentation:</p> <p>a) Indicated whether there is any veracity to structural issues</p>	

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
					<p>that have been identified by the Jamaica Brigade (JFB);</p> <p>b) A copy of the Inspection Report from the JFB;</p> <p>c) Details of the requirements for the occupancy approval from the JFB;</p> <p>d) The scheduled date for the arrival of the Fire Doors on the island; and The Contractor's installation schedule to complete these works once they have received the Fire Doors on site.</p>	
5	June 28, 2022	CHASE Fund	<p>1. Construction of Leeds Primary and Infant School – St Elizabeth;</p> <p>2. Construction of Santa Cruz Primary and Infant School – St Elizabeth</p>	<p>Projects lagging in progress over the months of May and June 2022 which threatens to impact the schedule of the end users for the reopening of both schools for the September 2022-2023 period.</p>	<p>The referenced matter is of concern to the Commission given that both projects are scheduled to be completed in August 2022, and their timely completion would assist the respective end users in preparation of the additional space for commencement of the September 2022-2023 school year.</p> <p>The matter of timely completion is very critical and the Contractor will have to better coordinate and provide the required resources to accelerate the progress of both projects, to achieve the scheduled completion deadline. In this regard, the Commission is requesting an approved copy of the Contractor's revised Works Schedule/Programme.</p> <p>In light of the abovementioned</p>	

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
					occurrences, the Commission is respectfully recommending that in accordance with the terms and conditions of Contracts, the CHASE Fund, put mechanisms in place to ensure that both contracts are completed within their respective timeframe.	
6	July 11, 2022	Planning Institute of Jamaica (PIOJ)	Request for Expression of Interest - Development of a Nation Brand Strategy and Brand Identity for Jamaica	After reviewing the tender document, it was noted that a score was assigned to the 'Demonstrated Experience in Hosting Public Events' criterion, however it was not clear how the PIOJ was planning to apportion points to Bidders.	It was recommended that the PB provide a further breakdown of the score, prior to the close of tender, to ensure objectivity.	The PB acknowledged the recommendations made by the IC and expressed that if the criterion was to be adjusted, it would have placed the respective consultants at a disadvantage. The alternative of cancelling and republishing this assignment would require a re-evaluation of the procurement timeline. Further to same, they advised that the project will ensure that criteria for all upcoming assignments are quantifiable, were possible.
7	July 12, 2022	Jamaica Civil Aviation Authority (JCAA)	Provision of Female Uniforms	The Evaluation Criteria of the Bid Document did not provide clear and objective mechanism for the allotted points that were to be calculated for each Bid received.	It was recommended to the Authority to amend this information and to provide an addendum of the changes	The PB acknowledged the recommendations made by the IC and that they had extended their Bid Submission deadline to ensure that the anomalies were rectified.
8	July 19, 2022	Accountant General Department (AGD)	Procurement of Non-Consulting Services for the Printing of Life Certificates & Pay Advice Slips	The Public Body indicated in their Tender Document that there would be no standstill period.	The Office recommended that the relevant clause be amended in	Recommendation was accepted by the PB.

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
9	August 17, 2022	Ministry of Health and Wellness (MoHW)	Business Process Outsourcing Services for the Complaints Management System and Verification and Issuance of Digital Vaccine Certificates	1. The relevant clause was not amended to include the number of days for the standstill period. 2. The Office is unclear how points will be allocated to Bidders.	accordance with the law. 1. The PB was advised to make amendment by including the number of days for the standstill period. 2. We recommended that the Ministry provide a further breakdown of points per criterion.	
10	August 23, 2022	The College of Agriculture Science and Education (CASE)	Construction of Diagnostic Intervention Centre	The following were observed during a site visit in August 2022: a. The site was in a state of abandonment as no activity or workmen was observed; b. The access gate had been demolished, which left the site exposed to possible theft or vandalism; and c. The project is also beyond the revised completion date of July 30, 2022, and will be further negatively impacted by this cessation of the works on site.	The Commission visited the referenced project site on August 10, 2022, and noted the following: a. The site was in a state of abandonment as no activity or workmen was observed; b. The access gate had been demolished, which left the site exposed to possible theft or vandalism; and c. The project is also beyond the revised completion date of July 30, 2022, and will be further negatively impacted by this cessation of the works on site. In this regard, the Commission is requesting that you provide details on the cause for the delays /cessation of the works as at the date of the visit mentioned. The information must include the time loss, the impact the delays will have on the project's completion also	

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
					<p>steps taken by the MOEYI/Contractor to resolve the issues at its earliest, as the extended completion date for the project has expired.</p> <p>Additionally, the Commission would like to advise you of its dissatisfaction with the progress of the project and is encouraging parties to the contract to earnestly pursue all applicable contractual measures, to conclude the project, which is now significantly behind its scheduled completion date.</p>	
11	August 2022	Ministry of National Security (MNS)	Construction of Westmoreland Division Headquarters for the Jamaica Constabulary Force	<p>The eligibility and qualification criteria outlined in the Eligibility and Qualification Table, Section III of Bidding Document, specifically, No. 3 - Financial Situation and Performance, 3.1 – Financial Capabilities, item (ii), did not provide a “breakdown” in the Bidding Document how the bids would have been evaluated. That is, how the Ministry intended on satisfying itself that the bidders had adequate sources of finance to meet the cash flow requirements on works currently in progress and for future contract commitments. In the evaluation of the bids, the following assumptions were introduced by the MNS’ evaluation committee:</p> <p>“- Required for works to be completed short-term3 (assumed 50% value</p>	<p>IC opines that, for optimal transparency, these assumptions should have been stated in the evaluation criteria of the Bidding Document under the relevant section, or at minimum, on Form FIN 3.4. The absence of same in the referenced documents lends itself to subjectivity, which the Ministry also concurred by stating that, “...the assumptions may be open to questioning of their reasonableness and uniformity of application.”</p> <p>Based on the foregoing, the IC reiterates its recommendation that the subject procurement opportunity be aborted and re-tendered.</p>	<p>The MNS noted the IC’s feedback regarding “<i>Assessment of the Financial Situation and Performance- 3.1</i>” in its letter dated July 5, 2022, and concurred that there “<i>is a possibility that the referenced assumptions could have introduced a degree of subjectivity in the evaluation process since they were not explicitly documented in the Bidding Document.</i>” The MNS further informed that the Ministry will review the Bidding Document to incorporate the feedback received and proceed thereafter to re-tender the project.</p>

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
				of relevant outstanding works per Form FIN 3.4) - Required for works to be completed medium-term ⁴ (assumed 10% value of relevant outstanding works per Form FIN 3.4)”		
12	August 24, 2022	North-East Regional Health Authority (NERHA)	Supply, Delivery, Installation and Commissioning of Medical Equipment for the new Physiotherapy and Laboratory Building at the Annotto Bay Hospital	No standstill period was included in the Tender Document.	The relevant clause should be amended to include the standstill period.	Recommendation was accepted and addendum issued to bidders. Bid submission deadline was extended.
13	September 6, 2022	North-East Regional Health Authority (NERHA)	Construction of a Special Care Nursery	NERHA did not issue a letter advising the bidder of the cancellation of the procurement process	A requisition letter from the Commission was sent which respectfully reminded the NERHA that procurement procedures dictate that bidders be notified in writing of the termination of the process	
14	September 12, 2022	Airport Authority of Jamaica (AAJ)	Shoreline Protection at Runway 30 End, NMIA	Project progress is severely hindered due to financial issues faced by the contractor	Requisition letter written to AAJ re the way forward in completing the project.	
15	September 6, 2022	Jamaica Social Investment Fund (JSIF)	Port Maria Fire Station Construction, St. Mary	Project ongoing well over time, with the project being 90% complete for 5 months and the contractor dragging his feet to complete same.	Confirm whether Liquidated Damages have been applied to the contract.	
16	September 21, 2023	Court Administration Division (CAD)	Procurement of Copiers/Printers for Various Courts Island Wide	The tender document related to the Restricted Bidding Methodology and not National Competitive Bidding	The recommendation was for CAD to withdraw the issued tender document and replace same	Recommendation was accepted by the PB and the correct documentation for the respective

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
				(NCB) methodology as intended by the Division	with the appropriate documentation	procurement opportunity was issued.
17	October 10, 2022	North-East Regional Health Authority (NERHA)	Rehabilitation of St. Ann's Bay Regional Hospital Sewage Treatment Plant	a. The site was inadequately maintained and required de-bushed; b. The progress of the works on site were not in accordance with a scheduled completion of October 31, 2022; c. Throughout the meeting, technical matters were raised which are to be resolved in a technical project meeting with the necessary parties involved. The monthly site meeting should entail the progress of the works, delays if any and how the approach to be taken by the team to achieve set targets and deadlines; d. With less than two weeks remaining on a 10-month project which has span over two (2) years, it is surprising that both the Contractor and Consultants are information project, whether it be Request for Quotation (RFQ) or Request for Information (RFI).	A requisition letter from the Commission was sent outlining the issues observed and requested a copy of the amended contract document for the extension of the contract.	
18	October 12, 2022	National Land Agency (NLA)	Supply and Delivery of 14 Multifunction Printers and Consumables	A review of the tender document was conducted and it was noted that the Evaluation Criteria and Client Referral Form consisted of conflicting timeframes.	It was recommended to correct this discrepancy and issue an addendum prior to the deadline of bid submission	
19	October 18, 2022	The College of Agriculture Science and Education (CASE)	Construction of Diagnostic Intervention Centre	a. The site yet again is in a state of abandonment as no activity or workmen was observed;	A requisition letter from the Commission was sent outlining the issues observed and	

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
				<p>b. A number of glass windows and doors were battened down using plyboard to reduce possible damage from Tropical Storm Ian which passed by the island September 24-25, 2022. Since then the plyboards have not been removed which gives the perception that no significant work has been done since; and</p> <p>c. The project is now over two (2) months beyond the most recent revised completion date with no significant increase in progress over that period</p>	<p>requested details on the cause for the delays /cessation of the works as at the date of the visit mentioned and copy of the Variation Order prepared for remeasurement of works not included in the Bill of Quantities.</p>	
20	November 3, 2022	Western Regional Health Authority (WRHA)	Supply and Delivery of Industrial Hand Towels to the Western Regional Health Authority	<p>A review of tender document was conducted and noted that the issued tender document related to Restricted Bidding under Request for Quotation and not National Competitive Bidding methodology as intended by the Authority. Additionally, it was noted that the Procurement Notice stated that National Competitive Bidding Procedures in accordance to the Government of Jamaica Handbook of Public Sector Procurement Procedures (Revised March 2014)</p>	<p>It was recommended that the Authority withdraw the issued tender document and replaced same with the appropriate Annex. It was further recommended that the bid submission deadline for the opportunity be extended to facilitate the issuance of the revised tender document. Additionally, the Authority was reminded to be guided by the current legislation pertaining to Public Procurement.</p>	<p>The Western Regional Health Authority had accepted recommendation and extended the bid submission deadline</p>
21	January 30, 2023	Jamaica Social Investment Fund (JSIF)	Grange Hill Primary School Expansion & Rehabilitation, Westmoreland	<p>a. The practical Completion inspection on December 20, 2022, and noted, inter alia, that remedial works would be required in respect of openings between the wooden door jambs and masonry, repainting</p>	<p>A requisition letter from the Commission was sent outlining the issues observed and direct your attention to the International Building Code (ICB) which guides construction practices in Jamaica,</p>	

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
				<p>to some walls, cleaning up paint splattering on floor in several areas, completion to some plumbing and electrical activities, installation of some school furniture and completion of the linkway;</p> <p>b. The observations of great concern is in respect of the height of the last stair riser at the first-floor landing, which is approximately 1200 mm (4") high, whilst the other risers are approximately 2100mm (7") in height, for the two stairways on the building;</p>	<p>which states, inter alia, that, Section 1009.4.4 - Dimensional uniformity- "Stair treads and risers shall be uniform size and shape. The tolerance between the largest and smallest riser height or between the largest and smallest tread depth shall not exceed 3/8 inch (9.5 mm) in any flight of stairs,"</p> <p>The aforementioned difference in the height of the stair riser is of concern as it is hazardous whether ascending or descending the stairway. Considering that the stairway will be extensively utilized by students, teachers and other members of the school's community, we are strongly recommending that in accordance with the ICB Clause, 1009.4.4, this critical matter be appropriately resolved by the contractor before the school is handed over to its end users.</p>	
22	January 24, 2023	Ministry of Agriculture and Fisheries (MoAF)	The Construction of a Small Ruminant House at the Bodles Research Station, St. Catherine	On January 25, 2023 members of the Commission attended a site meeting and the subsequent site visit to the captioned project. Based on discussions during the referenced site meeting it recognized that the works were still significantly behind the Contractor's Work Schedule/ Programme; and d. the meeting was advised that the contractor would be required to request an extension of time in accordance with	A requisition letter from the Commission was sent outlining the issues observed and requested a copy of the Conditions of Planning and Building Approval issued by the Parish Council and a copy of the approved Construction Drawings issued by the Parish Council. The Commission is reminded MoAF that the works being effected by the contractor must be in accordance with the "Specifications" as outlined in the	

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
23				that outlined in the Contract Document, before the contract expired.	Contract Document and supporting contract drawings.	
	February 17, 2023	MNS	X-Ray Facility for Institute of Forensic Science and Legal Medicine	During the pre-bidders meeting, concerns were raised by an attendee regarding the possible involvement of a bidder in the technical development and asked whether that bidder would be allowed to participate.	We requested further particulars regarding the allegation. This information was due on March 3, 2023; however, the Entity has not responded.	
24	February 23, 2023	Institute of Forensic Science and Legal Medicine	Funeral Home Services	The evaluation criteria were subjective and unmeasurable	Recommend that the Entity extend their bid submission deadline and revise their criteria.	The Entity did extend their bid submission deadline; however, they challenged the recommendation to revise their criteria.
25	March 10, 2023	Institute of Forensic Science and Legal Medicine	Procurement of Funeral Home Services	1. Evaluation matrix not subjective enough. 2. Evidence of working capital not requested in a standard format	1. Bid submission period extended and key be developed to guide evaluation process. 2. Specific documents to be requested as proof of working capital.	Recommendation not accepted. Meeting to be convened
26	March 22, 2023	South East Regional Health Authority (SERHA)	Supply, Delivery, Installation and Commission of Digital Radiographic Machines for the Kingston & St. Andrew Health Department	The Authority did not clearly define how the bids would be evaluated.	We recommended that they include evaluation criterion which should be issued as an addendum based on the timeline for the bid submission.	The PB did not accept out recommendation as they stated that bids will be evaluated based on their responsiveness to the eligibility requirements and the bidder who meets the requirement and who has the lowest cost will be awarded the contract.

Appendix 3: - Areas of Impact - Licences and Asset Divestment/ Acquisition

During the course of the Financial Year the Division, as part of its core functions, provided a number of recommendations to Public Bodies in respect of the Divestment and Licensing process. These recommendations are summarized below:

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
1	May 4, 2022	Sugar Industry Authority	Lease of Property – 80 Marcus Garvey Drive, Kingston	A copy of the Combined SIA SIRI General Ledger for the period from February 1, 2021 to February 28, 2022 outlining the dates and number of deposits made does not appear to be in accordance with the terms stated at Item 4 of the Lease Agreement	SIA is to confirm whether monthly payments were made in accordance with the term indicated	The SIA in letter dated May 18, 2022 advised that the monthly payments were not made in accordance with item 4 of the Lease Agreement. Note made of the Lessee's unpunctuality in its payments and the concern highlighted both verbally and via emails. The SIA will further write to Seprod reminding them of the due date of the lease payment and the attendant penalty for late payment.
2		Institute of Jamaica	Lease of Property – Green Hill Field Station	Having gone to tender before, the IOJ requested guidance whether: <ol style="list-style-type: none"> 1. A valuation of the property is necessary as one was done last year 2. The property has to be advertised for the new request 3. The IOJ can undertake a Limited tender with this new RFOL 4. An audited financial statement is a compulsory requirement for a prospective bidder 	The IOJ was advised as follows: <ol style="list-style-type: none"> 1. Refer to Section 2.2.7 of the Policy Framework and Procedures Manual for the Divestment of Government owned Lands, 2015 which states "Valuations shall not be older than 12 months" 2. Refer to Section 5.2.5 of the Policy Manual which carefully outlines the circumstances which allows for divestment of Government of Jamaica Lands without advertising 3. The Policy Manual is utilized to guide Land Divestment processes. The Limited tender methodology as described by Section 1.1.3 of the 	In its response dated April 4, 2022 the IOJ indicated: <ol style="list-style-type: none"> 1. The Agency has contacted the National Land Agency to conduct a valuation of the property 2. In accordance with the GoJ Policy the RFOL will be advertised in at least two of the following media: <ol style="list-style-type: none"> a. Print Media – Newspaper Procurement Page b. Local Post Office c. Church Bulletin Board d. Agency's website 3. The Agency will conduct local competitive bidding and shall advertised in the National daily newspaper 4. For the last three procurements undertaken, the

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
					<p>Government of Jamaica Handbook of Public Sector Procurement Volume 2 refers to the invitation of a specific number of contractors to submit bids for a particular procurement ...Given that the IOJ has unsuccessfully undertaken the divestment process for the captioned property over a period of time, kindly confirm whether the IOJ intends to utilize this procurement methodology to select from bidders who previously expressed an interest in the referenced property. Provided that is the intention of the IOJ, kindly indicate the method to be used by the IOJ to make an unbiased selection of potential bidders</p> <p>4. All bidders are required to meet the qualification criteria set out for the bidding process which outlines the minimum criteria/standard bidders must meet in order to be considered for the award of a contract. Notably, the bidder must be able to demonstrate their capacity to perform the</p>	<p>Agency requested Audited Financial Statements ...Based on the feedback from a number of stakeholders the Agency will make an amendment to this clause. Instead of the submission of audited financial statements we will request annual closed accounts signed by a chartered Accountant along with Current bank statements.</p>

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
					contract and this may include <i>inter alia</i> , their experience, technical qualification and finances. Please refer to Section 5.2.2 and Schedule III of the Policy Framework and Procedures Manual for the Divestment of Government Owned lands 2015 which provides a guide for the criteria of Evaluation	
3	April 26, 2022	Development Bank of Jamaica	The Greater Bernard Lodge Development Master Plan	Members from the DBJ queried whether they would have to re-advertise the divestment opportunity given that they had not receive a bid for the tender.	5.2.5 Divestment in Special Cases of the Policy Framework and Procedures Manual for the Divestment of Government Owned Lands, 2015. "The principle that shall govern the divestment of land in special cases is that there must exist exceptional and special circumstances by virtue of which the purchaser has an interest in the acquisition of the land, over and above that of any other purchaser." In those circumstances, the land can be disposed of by sale without advertisement. Should the circumstances surrounding the Greater Bernard Lodge divestment opportunity fall within the scope outlined then it is the better view to proceed with the divestment as recommended in the policy manual, providing the requisite justification.	The entity acknowledged the comment.
4	September 19, 2022	National Housing Trust	Sale of Commercial Property – Martin Street, Spanish Town, St. Catherine	1. Neither an award criterion nor an evaluation methodology was communicated to prospective Bidders in the	1. For transparency, it is important that bidders are duly advised of the award criterion and the methodology which will be utilized to	The NHT letter dated September 28, 2022 indicated that due to the cost associated with the commissioning of a valuation report, a management decision was taken to only

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
				<p>Information Document.</p> <p>2. The date of Close of Bid was Wednesday June 15, 2022 however it was noted that the Valuation Reports submitted from Allison Pitter & Company Limited and Clinton Cunningham & Associates were dated July 29, 2020 and July 24, 2020, respectively. Both Valuations were dated, as they were not conducted within the required twelve-month period</p>	<p>evaluate the bids submitted.</p> <p>2. Section 2.2.7 (j) of the Policy Framework and Procedures Manual for the Divestment of Government Owned Lands, 2015 stipulates that “Valuations shall not be older than 12 months” The Policy Manual also indicates that “The Government shall seek to optimize income from the divestment process by divesting lands at current market value...”</p> <p>3. The NHT is encouraged to provide fulsome information to prospective bidders and ensure that current up-to-date Valuations are utilized in the divestment process</p>	<p>request such upon receipt of bids.</p> <p>With respect of the concerns that neither an award criterion nor evaluation methodology being communicated to Bidders, the NHT is currently reviewing its processes and the appropriate measures will be taken to address same with alacrity.</p>
5	August 9, 2022	Water Resource Authority	Notice of Application for Water Resource Licence – Jamaica Aggregates Limited to abstract and use 3,785 cubic meters of water per day from Yallahs Pre Mix Well . St. Thomas ,	<p>1. The referenced Licence number A2020/101 issued August 10, 2021 is for a period of 1 year, therefore the expiry date should be August 9, 2022. There however appear to be an anomaly in your letter to the applicant dated August 10, 2021. An incorrect expiry date of August 9, 2023 was stated in the referenced letter</p> <p>2. The number of days given to the public for the submission of objections was less than the twenty-one (21) days required. The first newspaper advertisement published on January 15, 2021</p>	<p>1. LADA recommends that the necessary amendment be made to the Licence to reflect the correct expiry date</p> <p>2. WRA to indicate the justification for the shortened response time given for the submission of objections</p>	<p>1. The WRA in its response dated August 26, 2022 indicated that the necessary corrective steps have been taken to ensure compliance with the relevant policies and procedures</p> <p>2. The applicant had been instructed to place the advertisement giving the 21 days’ notice. However, they delayed in placing the advertisement and then did not make the adjustment. Processing thereafter was an oversight on the part of the WRA. Further to this, team meetings have been held with a view towards not letting this happen again.</p> <p>3. The incorrect expiry date of August 9, 2023 was a typographic error. This had been identified and corrected to August 9, 2022 at some time prior to the IC’s communication</p>

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
				indicated that the due date for the submission of objections was before Monday February 1, 2021. However, the due date should have been stated as February 5, 2021 in order to comply with the established requirement		
6	June 30, 2022	Transport Authority	Property for Sale Jamintel Building located at 97-101 Duke Street and 15 North Street, Kingston	<ol style="list-style-type: none"> The tender process was initiated without the usual formalities associated with the process. Pursuant to Section 2.2.7 (f) and (i) of the Policy Framework and Procedures Manual for the Divestment of Government-Owned Lands, 2015 states that <i>“all lands to be divested shall be valued by the Commissioner of Land Valuations or by a Chartered Valuation Surveyor”</i> Additionally, the <i>“valuations shall not be older than 12 months”</i> 	<ol style="list-style-type: none"> Subject to Cabinet’s approval and consistent with the value threshold required for Cabinet’s approval, it is recommended that a minimum of two valuations be conducted for the divestment of the property, should the valuation of this property be above that threshold, that is \$60,000,000.00. The Transport Authority is to closely monitor the tender process and seek all required approvals for the divestment of the property 	Letter dated July 12, 2022 from Transport Authority indicated that It was not in a state of readiness to proceed with the divestment of the Jamintel Building. The action taken was a pre-emptive move to test the market ahead of the approval expected to be given by Cabinet
7	July 15, 2022	National Housing Trust	Sale of Commercial Property in Clarendon, Westmoreland and Trelawny	<ol style="list-style-type: none"> At the tender opening Ceremony, a decision was taken to reschedule a tender opening time for a subsequent tender opening from 11:00am to 10:40am given that the tender opening ceremony ended 	<ol style="list-style-type: none"> The Tender Officer was advised that the original tender opening time should be maintained since that time would have already been communicated through the print media and associated Information Document The NHT was reminded that the 	The time for the subsequent tender was maintained.

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
				earlier than expected.	divestment information comprised in the publications and the associated Information Document ought to be maintained as taking precedence in all circumstances, save and except where addenda of changes are communicated to the Bidders. 3. Bidders are afforded the opportunity to attend Tender Openings and any change in time may exclude potential attendees from an opportunity which they are entitled to as part of the transparency and impartiality of the divestment process	
8	December 6, 2022	Ministry of Agriculture and Fisheries	Licences to Import Chicken Backs and Necks - Application Submission Period: August 1, 2022 – August 8, 2022	<ol style="list-style-type: none"> 1. The approval and issuance of all applications in respect of Permits/Licence for the importation of chicken necks and backs is undertaken solely by the Senior Veterinary Officer 2. Only in the absence of the Senior Veterinary Officer that other personnel (veterinary Officers) may aid in the processing of the permit/licences 3. The number of applications are fairly numerous as 5,509 applications were received during the period April 1, 2022 to April 8, 2022. 	The Director of Investigation noted that only one individual is responsible for the processing and recommends the employment of a more robust approach in undertaking the licensing activity. This may include the integration of additional human resource in the process with the anticipation that accountability, accuracy and transparency of the process will be bolstered.	The Ministry of Agriculture in its response dated January 17, 2023 indicated that it notes the recommendation.
9	November 2, 2022	Ministry of Economic Growth and Job Creation	Sale of Land in Haughton Gardens, Lucea, Hanover	1. Review of the Advertisement placed revealed that there was an omission of the date, time and location of the Bid Opening Ceremony.	MEG&JC was advised that information presented to applicants/bidders inviting bid submissions must be complete. Additionally, it was recommended that an indication be made in the advertisements whether	In letter dated November 14, 2022, the Ministry acknowledged the IC's comments related to the advertisement in the Gleaner and indicated that the matter will be addressed in future advertisements.

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
				2. The tender Opening documents were not signed by representatives present	<p>Bid Opening Ceremonies will be held virtually or face to face.</p> <p>The Ministry was also advised that in compliance with Section 5.2.1 Sub-section 3 of the Policy Framework and Procedures Manual government entities are required to outline particular details on the land and all interested parties shall be provided with the information package outlining:</p> <ol style="list-style-type: none"> 1. A summary of salient facts on the property; 2. A location map and/or survey plan 3. Permitted land uses and development potential of the site; 4. Special conditions for land development, if any; 5. Information concerning eligibility requirements; 6. Instructions to prospective purchasers; 7. Application forms, if applicable 8. Location, time and date for receipt of offers. <p>The Ministry was also advised that the Information Package should also state the award criterion to be utilized.</p>	
10	January 30, 2023	Agro Investment Corporation	Investment Opportunity – 36 acres of irrigated lands at Bernard Lodge, St. Catherine	<p>a) The advertisement was void of the following information:</p> <ol style="list-style-type: none"> 1. The proposed use of the land 2. The date and place at which application forms can be obtained 3. The date and place where application forms should be returned 	<p>The Corporation is being reminded that the evaluation process is a critical step which allows for a detailed analysis of the bids/offers received resulting in the selection of the most advantageous bid/offer for the corporation and as such greater care should be taken when conducting the evaluation and specifically the scoring of offers submitted by potential applicants.</p> <p>It is also recommended that the Evaluation of bids for each Agro-Farms be</p>	Awaiting response of entity

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
				<p>4. Statement to the effect that “Agro Investment Corporation is not bound to accept the highest or any offer”</p> <p>b) Information packages ought to be prepared. Section 5.2.1 of the Policy Framework and Procedures Manual advises government entities to, as far as is possible, prepare information packages outlining the following details:</p> <ol style="list-style-type: none"> 1. A summary of salient facts on the property; 2. A location map and /or survey plan; 3. Permitted land uses and development of potential of the site 4. Special conditions for land development, if any; 5. Information concerning eligibility requirements; 6. Instructions to prospective purchasers; 7. Application forms, if applicable; 8. Location, time and date for receipt of offers <p>c) The Evaluation process – The score sheet submitted by one of the Evaluators contained several anomalies highlighted below:</p> <ol style="list-style-type: none"> 1. The totals do not tally 2. Section 2 of the score sheet which has a maximum allowable score of 30 points was exceeded for several applicants 3. Breakdown of score was not provided for the sub-categories, for example Section 1 Financial Resources, a certain bidder was assigned 35 points while in another case 	<p>conducted separately and a comprehensive report be prepared to include the following:</p> <ol style="list-style-type: none"> 1. Bids/Applications received 2. Bidders Compliance Matrix 3. Evaluation Score Sheets; and 4. Recommendation(s) for award, <p>The Policy Framework and Procedures Manual for the Divestment of Government Owned Lands (2015) be utilized to guide the divestment of all subsequent opportunities</p>	

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
				<p>another was assigned 50 points in the same subcategory. This maximum score in the referenced subcategory was 30 points.</p> <p>4. Although the other two Evaluators indicated a score for the applicant, a particular evaluator for item 6 "Business Plan/Summary" (surname ineligible) did not assign a score to this component.</p>		
11	February 10, 2023	Development Bank of Jamaica	The Greater Bernard Lodge Development	<p>DBJ requested advice on how to treat with an issue where only one bid was received however it had not passed the technical stage for various reasons. The DBJ enquired whether it could utilize the Direct engagement (one or many) of any party including the previous bidder on the basis that Section 5.2.5 "Divestment in Special Cases" states that <i>"the principle that shall govern the divestment of land in special cases is that there must exist exceptional and special circumstances by virtue of which the purchaser has an interest in the acquisition of the land, over and above that of any other purchaser. In those circumstances, the land can be disposed of by sale without advertisement. For example, where divestment is being carried out subsequent to an unsuccessful public offering"</i></p> <p>It was observed that one other bid was submitted subsequent to the close of bid date and was rejected. The process was</p>	<p>The Policy Framework and Procedures Manual for the Divestment of Government-Owned Lands, 2015 (hereinafter referred to as the Policy Manual) shall take precedence over the Privatization Policy Framework & Procedures Manual concerning the divestment of government owned lands</p> <p>Notwithstanding the unsuccessful public offering, the usage of Direct Engagement with any bidder is in the discretion of the entity and must be exercised with due diligence, transparency whilst ensuring that adequate opportunity for competition is encouraged throughout the process</p> <p>Should the DBJ decide to utilize the methodology of Direct Engagement in this divestment project with "... (one or many) any party including the previous bidder" it is incumbent on the DBJ to ensure that their option is one that assures value for money in the circumstances. It is the responsibility of the DBJ to properly satisfy themselves of the benefit and feasibility of engaging with any bidder that expressed an interest in the divestment opportunity.</p> <p>Given that the evaluated bidder was significantly</p>	The DBJ thanked the Investigation Division for its assistance.

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
				terminated. The DBJ also sought advice on which of the policies (Public Private Partnership or Policy Framework and Procedures Manual for the Divestment of Government-Owned Lands, 2015)	below the required score the DBJ is advised to exercise caution if the bidder is to be considered for Direct Engagement. Additionally, it is recommended that the DBJ contacts the relevant personnel from the Ministry of Economic Growth and Job Creation (MEGJC) for further guidance and final approval on the matter in order to satisfactorily discharge its mandate in providing advisory support to the Enterprise Team on this matter.	
12	March 10, 2023	Factories Corporation of Jamaica	Sale of Property – Lot 5 Beach Drive, Lyssons, St. Thomas; Lot 12 Hague, Trelawny; and Land Part of Port Morant, St. Thomas	<p>There were no information document prepared pertaining to the referenced divestment opportunities. The Evaluation criteria was not communicated to the potential bidders</p> <p>The advertisement published in the Gleaner dated August 5, 2022 indicated that offers <u>must</u> be deposited in FCJ's labelled tender box located in the Lobby at 17 Knutsford Boulevard, Kingston 6- The Bid Receipt Record reflected three (3) bids submission/offers received and a notation which indicated that the third bid/offer was <u>not</u> deposited in the tender box but was left at the Receptionist's desk</p> <p>The Agreement for sale was not dated;</p> <p>The Agreement for Sale indicated a completion date as on or before ninety (90) days after the date of the agreement specified as July 26, 2022 which is calculated to be October 24, 2022 –</p>	<p>1. Interested bidders must be provided with an information package containing the following salient information:</p> <ul style="list-style-type: none"> a. A summary of salient facts on the property b. A location map and or survey plan, if available, c. Permitted land uses and development potential of the site d. Special Conditions for land development e. Information concerning eligibility requirement f. Instructions to prospective purchasers; g. Application forms, if applicable; h. Location, time and date for receipt of offers <p>2. The Evaluation Criteria is to be included in the information package</p> <p>3. The FCJ is encouraged to fully inform officers in charge of the collection of bids of the instructions for the submission of bids by bidders. At all times, bids received</p>	<p>In its response dated March 24, 2023 the FCJ indicated that going forward it will ensure that prospective purchasers are provided with an information package including the requisite Evaluation Criteria when Purchase offers requests are issued.</p> <p>Reliance was placed on the date of the Agreement however going forward the entity will make the necessary adjustment.</p> <p>The entity indicated that the recommended bidder had not requested an extension to the Sales Agreement</p>

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
				<p>Clause 9 of the special conditions of contract indicated that time is of the essence whenever under this agreement for sale the purchaser fails to make a payment, the Vendor shall upon the expiry of fourteen (14) days' notice be entitled to immediately cancel this Agreement provided that the Vendor may grant an extension...Clause 10 of the special conditions of contract states that the Purchaser shall pay eight percent (8%) per annum on all monies payable which are not paid on the agreed dates</p>	<p>must be recorded in the Bid Receipt Record and placed in the appropriate and secure tender box.</p> <p>4. Recommend that for future transactions of this nature that the date be included.</p> <p>5. FCJ to provide assurance that the recommended bidder had formally requested an extension and confirmation whether any additional payments were made</p>	
13	March 10, 2023	SCJ Holdings Limited	Submission of applications – SCJ Land Divestment and Monitoring Committee	<p>Applications are submitted for approval by the Committee prior to a valuation being undertaken</p> <p>Valuation amount referenced in submission for a particular supplier was older than one year</p> <p>A rental rate was not stated in the submission in respect of a particular applicant</p>	<p>1. Requested the provision of justification for the use of the valuation amount older than one year when applying rental rates to submissions.</p> <p>2. For greater transparency a copy of the referenced Valuation reports be included in the submissions to the Committee. It is prudent that the SCJ Holdings Limited ensure that these properties are divested at current market rates</p>	Awaiting response
14	March 20, 2023	Packing House Facility Investment Opportunity	Agro-Investment Corporation	<p>Noted in February 17, 2023 printed advertisement that there was an omission of the date, time and location of the Bid Opening Ceremony and that this feature be included in the AIC's Lease Management Standard Operating Process.</p>	<p>3. An indication is to be made in Advertisements Entity to ensure that all tender opening documents and any other pertinent correspondence or documentation relating to all aspects of the divestment process are signed in order to verify and confirm the information in documents for proper record keeping.</p> <p>4. The Information Package should also</p>	In its letter dated April 26, 2023 Agro-Investment Corporation invited the Investigation Division to discuss the concerns and a way forward with the packaging and structuring of advertisements.

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
					state the award criterion	
15	March 22, 2023	Sale of Lots 258-259 Rocky Close, upper Fort, Hellshire, St. Catherine	Urban Development Corporation	The Information Memorandum Document states that once the Bidder meets the requirement at points 3 and 4 of the referenced document then they would" ... <i>be considered successfully evaluated</i> "	5. The documentation provided does not advise of the methodology which would be utilized in a tie bid situation. The Corporation may be guided by Section 5.2.3. (2) of the Policy Framework and Procedures Manual for the Divestment of Government owned lands which outlines how to treat with tie-bids situations.	Awaiting response

Appendix 4 - Reports tabled in the Houses of Parliament over the Period

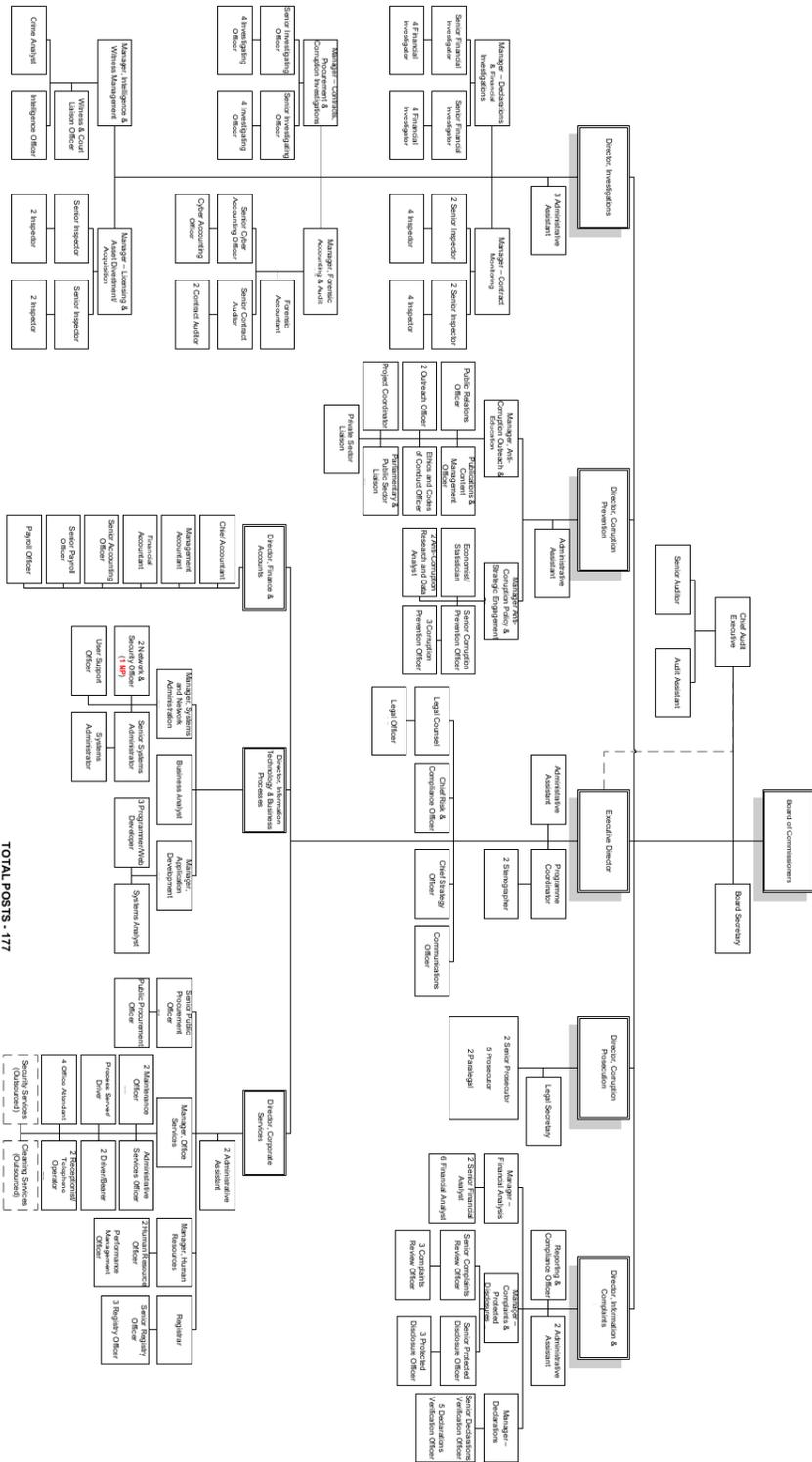
No.	Investigation	Commencement Date	Date Investigation was Completed	Date of Tabling in House of House of Representatives ⁴¹
1.	Special Investigation Concerning Allegations of Favouritism, Conflict of Interest, Impropriety and Irregularity in the award of a contract by the National Works Agency (NWA) under the East Portland Special Mitigation Programme 2017.	January 22, 2018	March 23, 2021	June 14, 2022
2.	Special Report of Investigation conducted into the circumstances surrounding the award of contract to Knightsman Security Limited for the provision of security services at the Downtown Kingston Transportation Centre for the period 2010 to 2011	April 7, 2015	September 14, 2020	September 13, 2022
3.	Report of Investigation Concerning Allegations of Impropriety and Irregularity in the Award of Contracts, the Issuance of Licences and the Implementation of Projects by the Jamaica Dairy Development Board and/or the Ministry of Industry, Commerce, Agriculture and Fisheries	May 17, 2017	June 2, 2022	October 19, 2022
4.	Report of Investigation Concerning Allegations of Nepotism, Conflict of interest, Impropriety and/or Irregularity in relation to Contractors Recommended and Board Appointments made by the Member of Parliament for North Western St. Elizabeth	January 26, 2021	September 8, 2022	October 19, 2022
5.	Report of Investigation Conducted Pursuant to Section 33 of the Integrity Commission Act Concerning Allegations of Conflict of Interest, Irregularities and/or Impropriety in the Appointment of Mrs. Olive Downer Walsh to the National Board of Directors of the Rural Agricultural Development Authority	March 3, 2021	September 2, 2022	October 25, 2022
6.	Special Report of Investigation Conducted into Allegations of Irregularity, Conflict of Interest, and Corruption In the Award of Certain Contracts by Petrojam Limited – Petrojam Report No. 3	January 23, 2018	December 2020	January 10, 2023
7.	Special Report of Investigation concerning the Circumstances Surrounding the Procurement Process(es) for the Award of Contracts for the Provision of Rosenbauer Fire Trucks (Pumpers) (through the National Safety Limited) by the Jamaica Fire Brigade	March 5, 2015	March 18, 2021	January 10, 2023
8.	Special Report of Investigation Conducted into Allegations of Conflict of Interest, Irregularity and/or Impropriety in relation to the Construction of Buildings by Mr. Ian Hayles, Member of Parliament for Western Hanover without approval from the Hanover Parish Council	April 24, 2015	February 2017	January 24, 2023
9.	Report of Investigation Conducted into the Circumstances which led to the Award and Implementation of a Contract, in the Amount of \$46,851,105.30 to Rahim's Cleaning and Trucking	June 12, 2020	February 2021	February 14, 2023

⁴¹ Reflects the date on which the report was tabled in the House of Representative.

INTEGRITY COMMISSION

	Limited, by the St. Ann Municipal Corporation in the Relation to its Ochi Rios Covid-19 Sanitation and Cleaning Project			
10.	Report of Investigation Conducted into the Circumstances Surrounding the Award of Government Contracts to Westcon Construction Limited During the Period 2006 to 2009	June 9, 2016	October 4, 2022	February 14, 2023
11.	Report of Investigation - Investigation into the Allegations Concerning Acts of Improprieties in the Procurement Practices at the Bethlehem Moravian College During the Period 2015-2017	November 23, 2016	February 7, 2023	February 28, 2023
12.	Report of Investigation - Conducted into the Allegations of Impropriety and Irregularity Surrounding the Award of a Contract Regarding the Provision of Quantity Surveying Services at a Property Located at 4 Windsor Road, St. Ann's Bay.	January 3, 2017	February 26, 2023	March 28, 2023

Appendix 5 – Organisation Chart



TOTAL POSTS - 177

Integrity Commission
Approved Organizational Structure
 With Effect From January 24, 2022

INTEGRITY COMMISSION
