



ANNUAL REPORT

TO PARLIAMENT
FOR THE YEAR 2017

LETTER OF TRANSMITTAL

March 31, 2018

Mrs. Jacqui Sampson-Meiguel
Clerk of the House
Parliament of Trinidad and Tobago
Levels G-9, Tower D
The International Waterfront Centre
1A Wrightson Road
Port of Spain.

Dear Madam,

Thirtieth Annual Report to Parliament for the Year 2017.

The Integrity Commission of Trinidad and Tobago respectfully submits its thirtieth Annual Report to Parliament on its activities for the year ended December 31, 2017. The Report is prepared in compliance with Section 10 of the *Integrity in Public Life Act, Chapter 22:01* which states:

"The Commission shall not later than 31st March in each year, make a report to Parliament of its activities in the preceding year and the report shall be tabled in the Senate and the House of Representatives not later than 31st May, so, however, that the reports shall not disclose particulars of any declaration filed with the Commission."

Kindly note that we have also submitted this Report in electronic form, as requested, to the following address: coth@tpparliament.org

Yours faithfully,



.....
Melville Baird
Chairman

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CHAIRMAN'S REMARKS

It is with great pleasure that I present the thirtieth annual report of the Integrity Commission of Trinidad and Tobago for the year ended 31st December 2017, to Parliament.

Issues of integrity and corruption have changed over the years but our fundamental mission of making people's lives better remains intact.

We made significant progress toward that goal in that we increased public consultation sessions aimed at promoting a better understanding of the Integrity in Public Life Act, Chapter 22:01 (the Act). We continued investigations of persons in public life, adopted a new system of public procurement, participated in a series of International and Regional Conferences on integrity and anti-corruption abatement and engaged students of secondary schools in activities on the theme of integrity and ethics.

We also embarked on a review of the Act, in an endeavour to strengthen various areas where it was potentially weak. This exercise we completed in early March, 2018 and the Act, with suggested amendments has been forwarded to the relevant Agency.

We press forward with our campaign in public education for the promotion and

preservation of integrity in all aspects of life, in order that Trinidad and Tobago might be a corruption free society. We consider it to be of cardinal importance to reach out in a positive, meaningful and consistent way to the young people of our country. It behoves us to ensure that principles of integrity are inculcated in their young minds with such intensity that these principles would become, in a metaphorical sense, an integral part of their DNA.

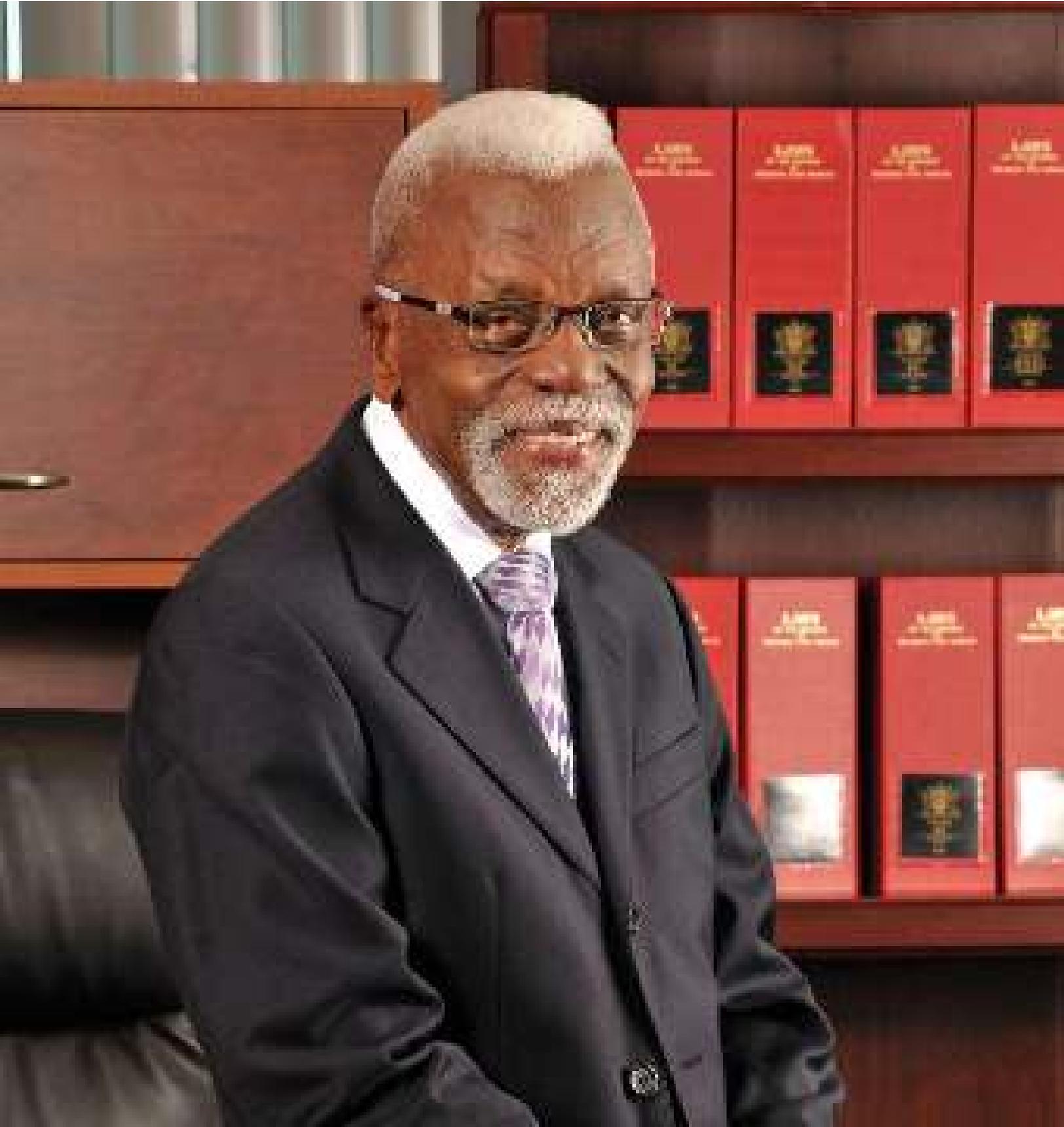
With this consideration uppermost in our minds, we intend to continue our engagement with the Ministry of Education and our schools in activities on Integrity and Ethics.

In the past year, the Commission Members, Registrar and staff, strove to maintain their focus on making the Integrity Commission the pre-eminent State institution for the advancement of integrity in all its ramifications in Trinidad and Tobago.

We shall continue in our efforts.



Melville Baird



VISION Statement

The Integrity Commission of Trinidad and Tobago is the premier state institution for the promotion and preservation of integrity in all affairs, to make Trinidad and Tobago a corruption free society.

MISSION Statement

The Integrity Commission of Trinidad and Tobago and its team of dedicated professionals promote and facilitate the highest ethical standards by:

- Ensuring compliance with the Integrity in Public Life Act;
- Detecting and eradicating corrupt practices and dishonest conduct;
- Educating the public in an effort to eradicate corruption, improve governance and engender a national culture of integrity; and
- Providing excellent customer service.



L-R, seated Chairman Mr. Justice Melville Baird (Ret.) and Mr. Pete London. L-R, standing Mrs. Angela Young Lai and Deputy Chairman Mr. Rajiv Persad.

THE COMMISSION

The Integrity Commission of Trinidad and Tobago consists of a Chairman, Deputy Chairman and three (3) other members who shall be persons of integrity and high standing. At least one (1) member of the Commission shall be an attorney-at-law of at least ten (10) years' experience and another shall be a chartered accountant, also of at least ten (10) years' experience.

Objectives

The objectives of the Integrity Commission of Trinidad and Tobago as stated in the Act are to:

- Make provisions for the prevention of corruption of persons in public life by providing for public disclosure;
- Regulate the conduct of persons exercising public functions; and
- Preserve and promote the integrity of public officials, institutions and for matters incidental thereto.

Role of the Integrity Commission

The Integrity Commission of Trinidad and Tobago is a constitutional body created by Sections 138 and 139 of the Constitution of the Republic of Trinidad and Tobago and established by the Act which makes provisions for the prevention of corruption of persons in public life by providing for public disclosure, regulating the conduct of persons exercising public functions and preserving and promoting the integrity of public officials and institutions.

In the exercise of its powers and performance of its functions under this Act, the Commission

A.

Shall not be subject to the direction or control of any other person or authority.

B.

May in all cases where it considers it appropriate to do so, make use of the services or draw upon the expertise of any law enforcement agency or the Public Service.

C.

Shall have the power to authorize investigations, summon witnesses, require the production of any reports, documents, other relevant information, and to do all such things as it considers necessary or expedient for the purpose of carrying out its functions.

HIGHLIGHTS OF THE YEAR

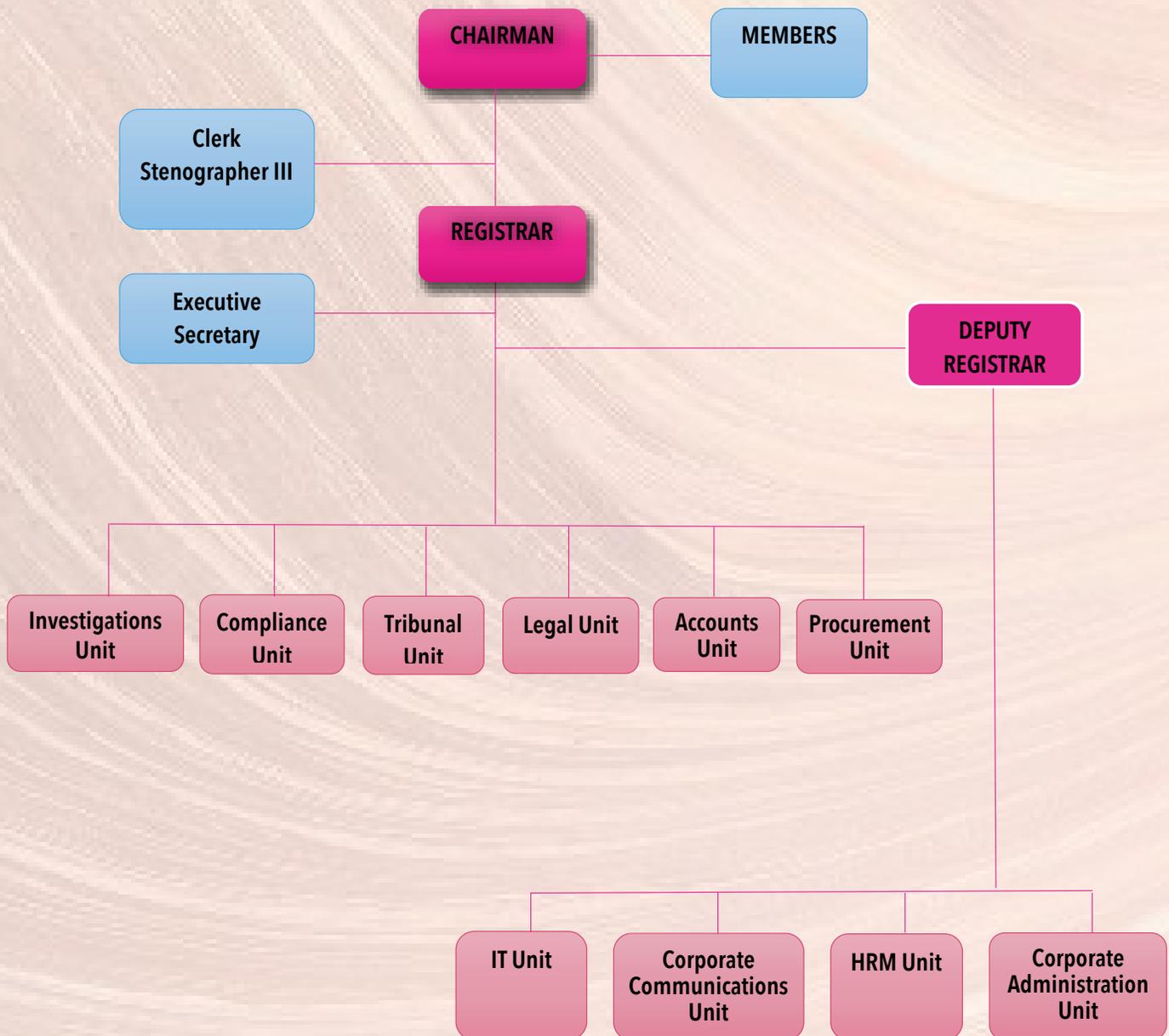
This Thirtieth Annual Report to Parliament has as its theme 'reinforcing our purpose, promoting integrity.' This is congruent with the Commission's objectives.

The Report highlights the extent to which the Commission ensured compliance with the Act, conducting investigations and promoting standards of integrity. It underscores the factors that have influenced the Commission's decisions throughout the year 2017.

During the review period the Commission:-

- Increased compliance outreach sessions by seventy-three percent (73 %).
- Published persons in public life who failed to file declarations of income, assets and liabilities.
- Filed ex-parte applications at the High Court against persons in public life who failed to file their declarations.
- Participated at the Third Annual Conference of the Commonwealth Caribbean Association of Integrity Commissions and Anti-Corruption Bodies (CCAICAB) in Jamaica from April 24-28, 2017.
- Participated at Singapore's Anti-corruption Strategies Conference from May 29-June 02, 2017.
- Presented (by the Chairman) a paper on the role and function of the Integrity Commission of Trinidad and Tobago at the second 'Future of Democracy Conference' held at the University of Bahamas, Oakes Field Campus, Nassau, from July 21-22, 2017.
- Attended the Trinidad & Tobago Transparency International Anti-Corruption Conference on September 28, 2017.
- Awarded students who participated in the Secondary School Poster Design Competition.
- Partnered in the launch of Integrity Clubs in secondary schools with the Trinidad and Tobago Transparency Institute (TTTI) and the National Parent-Teachers' Association (NPTA).
- Donated supplies towards those islands affected by hurricanes.
- Contributed to the Anti-Corruption Standard Survey in tackling Corruption in the Commonwealth Scoping Study Project by the Commonwealth, in conjunction with the Attorney General's Office.
- Developed a Fraud Policy for the organisation.
- Adopted a new system of public procurement in accordance with the Public Procurement & Disposal of Public Property Act 2015.

ORGANISATIONAL STRUCTURE



UNIT REPORTS ON ACTIVITIES

INVESTIGATIONS

The functions of the Investigation Unit entail receiving, assessing and investigating complaints alleging a breach of the Act or of the Prevention of Corruption Act, Chapter 11:11 by either a person in public life or a person exercising public functions.

Complaints, which must be made in writing, may be received via personal delivery or mail. In addition to complaints received from the general public, the Commission may, on its own volition, initiate an investigation.

In the discharge of its investigative responsibility, the Commission invited persons to provide information and to lodge complaints on matters suggestive of corruption. The Commission emphasized that all information provided would be treated in the strictest confidence. On the other hand, it warned that anyone who knowingly and mischievously made any false complaint or provided false information committed an offence and would be liable on conviction to pay a fine and serve a term of imprisonment.

Managing Complaints

The Act regulates the manner in which complaints can be addressed. The Commission may:

- (a) authorise an investigator to conduct an investigation into the complaint.
- (b) reject the complaint if it is found to be:
 - i. frivolous and vexatious;
 - ii. not made in good faith;
 - iii. devoid of sufficient grounds for an investigation; or
 - iv. not supported by evidence of probative value.

In each situation the person who made the

complaint, if known, was informed of the Commission's decision, as required by the Act.

During the course of its investigations, a substantial number of complaints were rejected because of the insufficiency of the evidence in support of the complaint or a lack of probative value of such supporting evidence. The Commission was therefore driven to conclude that the action and / or omission complained of, disclosed no breach of the Act or the Prevention of Corruption Act or the individual complained against is neither a person in public life nor a person exercising a public function.

When a complaint is investigated, a file is prepared. This file contains a comprehensive report from the investigator indicating all that was done in the course of the investigation, together with copies of all statements recorded and copies of all documentary exhibits obtained. The file is then forwarded to the Director of Investigations. The Director, after a detailed analysis and careful consideration of the file in its entirety, might either refer the file back to the Investigator for further investigation / action, or if he is satisfied, he would append his comments and submit the file to the Commission. The Commission would consider all the material contained in the file and would then decide whether the investigation should be discontinued, or referred to the Director of Public Prosecutions for whatever action he might deem fit. The person making the complaint, if known, would be informed of the Commission's decision.

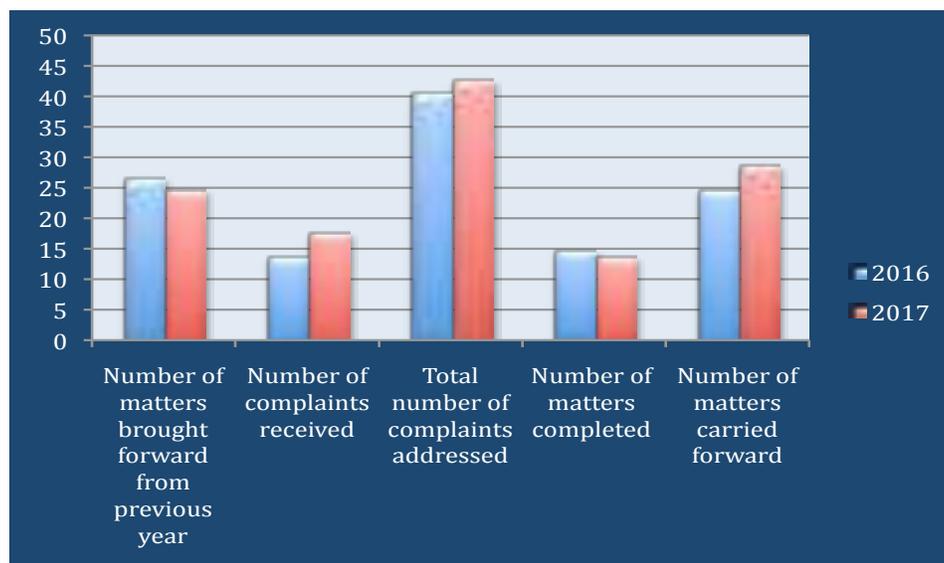
Performance Review

The Commission addressed forty-three (43) complaints and completed investigations into fourteen (14) or thirty-three percent (33%) of them as compared to thirty-seven percent (37%) for the preceding year. Whilst the number of completed

matters may appear to be minimal, this number is not a barometer of the level of productivity as a number of these matters were voluminous, of varying degrees of complexity, time consuming and labour intensive.

The under-mentioned table and graph are a summary of the matters addressed for the year under review and the corresponding period 2016.

SUMMARY OF COMPLAINTS	2016	2017
Number of matters brought forward from previous year	27	25
Number of complaints received for the year	14	18
Number of matters addressed	41	43
Number of matters completed	15	14
Number of matters carried forward to 2018	25	29



The work of the Investigation Unit was impacted by the inadequacy of the legislative authority vested in the Commission. This legislative inadequacy retarded its ability to obtain vital information, which invariably was the nucleus of many investigations and the absence of which stymied these matters. These shortcomings had a negative effect on the quality and effectiveness

of the investigative function. Cognizant of this, the Commission embarked on an exercise of corrective action. This exercise entailed a review of its legislative parameters, identification of weaknesses and the recommendation of suggested amendments with a view to enhancing its investigative capabilities.

COMPLIANCE

The Compliance and Review Unit is responsible for all compliance and process review related activities of the Commission. This involves the managing of the day to day activities pertaining to the intake of declarations, providing oversight on the reviews of declarations, and the processing of declarations to ensure compliance with the Act.

The principal functions provided by the Compliance Unit include:-

- Receiving, examining and retaining all declarations filed with it under the Act;
- Making such enquiries as it considers necessary in order to verify or determine the accuracy of the Declaration filed under the Act;
- Recommending for publication the names of persons in public life who have failed to file and / or furnish further particulars;
- Compiling and maintaining the Register of Interests;
- Examining the practices and procedures of public bodies, in order to facilitate the discovery of corrupt practices;
- Instructing, advising and assisting the heads of public bodies of changes in practices or procedures

which may be necessary to reduce the occurrence of corrupt practices;

- Designing and delivering Briefing Sessions to persons in public life on the completion of their Declaration Forms;
- Conducting Corporate Governance Sessions with the Boards of Public Bodies that fall under the purview of the Integrity Commission with a view to promoting good corporate governance practices.

Declarations of Income, Assets and Liabilities and Statements of Registrable Interests

The Integrity Commission is required to receive, examine and retain Declarations of Income, Assets and Liabilities and Statements of Registrable Interests from persons in public life, and to make such enquiries to determine the accuracy of such declarations. Persons in public life, as defined by the legislation include:

- Members of the House of Representatives
- Ministers of Government
- Parliamentary Secretaries
- Senators
- Members of the Tobago House of Assembly
- Members of Municipalities
- Members of Local Government Authorities
- Members of the Boards of all Statutory Bodies and State Enterprises in which the State has a controlling interest
- Permanent Secretaries and Chief Technical Officers

All persons in public life must file a declaration by May 31st of each year. For the year ended December 31, 2017, one thousand and ninety-two (1,092) declarations were submitted to the Commission. This represents a thirty-two percent (32 %) reduction when compared to 2016 where one thousand six hundred and twelve (1,612) declarations were filed.

1,092
Declarations
received
in 2017

This reduction was due to the following:

- a) The General Election held in September, 2015 where there was a significant change in the membership of the Board of Directors of the State Enterprises and Statutory Bodies;
- b) The composition of the Boards following the General Election, which in some instances were less than previously obtained.

Figure 1 shows that as at December 31, 2017, two

the following:

- a) Failure by the persons in public life to submit any response to requests for clarification on particular matters with respect to their declarations; no responses have been received to date;
- b) Failure by persons in public life to fully respond to requests for clarification on particular matters with respect to their declarations; only partial responses have been received to date;
- c) Failure by the persons in

Act, which required such persons to explain the accretion in value of the net assets disclosed which was not supported by the income earned. It should be noted that three (3) of these matters were resolved, while nine (9) are still engaging the attention of the Commission.

In 2018, the Commission intends to publish the names of those persons in public life who have failed to furnish further particulars / additional information, in accordance with Sections 11, 13 and 14 of the Act.

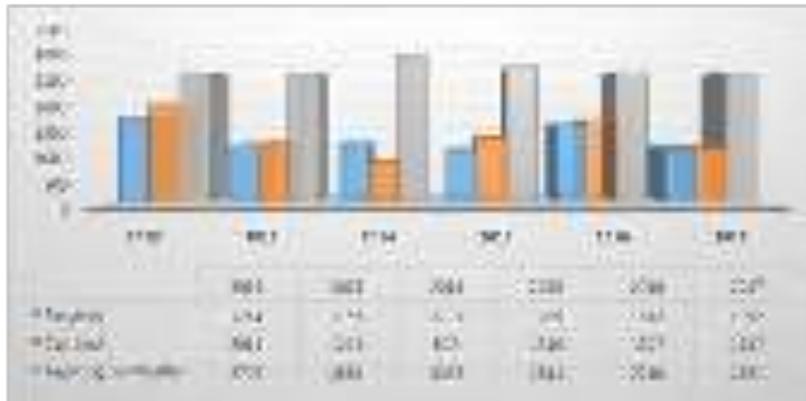


Figure 1: Processing of declarations in the last six (6) years.

thousand, six hundred and ninety one (2,691) declarations have not been certified. It should be noted that the majority of these declarations have been examined and are in various stages of completion as the Commission awaits further information from the persons in public life. The queries relate to

- d) Inconsistencies in the declared income against changes in the net worth of some persons in public life. In this regard, the Commission issued twelve (12) letters in accordance with Section 12 (5) of the

Certification of Declarations

1,117
declarations
certified
in 2017

The Commission is required to issue a Certificate of Compliance where, after the conduct of an examination, it is satisfied that a declaration has been fully made. In this regard, the Commission certified one thousand, one hundred and seventeen (1,117) declarations in the year in 2017.

YEARS	%	ACTUAL
2002 to 2009	18	202
2010 to 2016	82	915
	100%	1117

Table 1: Composition of Certifications for 2017

Table 1 refers.

This represented a thirty-five percent (35%) decrease when compared to the year 2016 where one thousand, seven hundred and seven (1,707) declarations were certified. This considerable decrease was as a result of staffing constraints experienced during the reporting period.

Compliance Challenges in 2017

The Commission has a central role in ensuring that persons in public life understand their obligations under the Act as they relate to the filing of a Declaration of Income, Assets and Liabilities and a Statement of Registrable Interests.

At the same time, these persons have an important role to play in meeting their legal obligations by filing the said declarations. While the Commission's preferred strategy remained one of self-regulation or voluntary

compliance, in circumstances where the persons in public life failed to comply, the Commission acted decisively in enforcing the provisions of the Act in an effective and efficient manner to ensure compliance.

Use of Statutory Powers

The Commission is empowered to publish the names of persons in public life who have failed to:

1. File a Declaration of Income, Assets and Liabilities and a Statement of Registrable Interests in accordance with Sections 11 & 14 of the Act.
2. Furnish further particulars/ additional information in accordance with section 13 of the Act. The Commission may publish this fact in the Gazette and at least one (1) daily newspaper.

This is done in accordance with Section 11(6) of the Act. If a person in public life fails to file

or furnish further particulars after the publication in the official Gazette and at least one (1) daily newspaper, the Commission may make an ex parte application to the High Court for an order to direct the person to comply with the Act.

935
names published

In 2017 the Commission published the names of nine hundred and thirty-five (935) persons in public life who failed to file Declarations of Income, Assets and Liabilities (Form A) and Statement of Registrable Interests (Form B) for the period 2012-2015 in accordance with Sections 11(1) and 14(1) of the Act. Figures 2 and 3 refer. The names of those persons were published in the Trinidad Express Newspaper on Friday 24th March, 2017 and in the Trinidad and Tobago Gazette on Friday 14th April, 2017.

This publication accounted for a total of one thousand, two hundred and thirty-three (1,233) Declarations of Income, Assets and Liabilities (Form A) and Statements of Registrable Interests (Form B) from nine hundred and thirty-five (935) persons in public life who failed to file declaration forms.

The statistics show a forty-one percent (41%) increase in the number of persons failing to file their declarations in accordance with the Act notwithstanding the decrease in the number of declarations per names published by 9.4%. This indicates a significant reduction in voluntary compliance given that the statistics show that eight hundred and forty-eight (848) individuals did not file for the year 2015 within the deadline, even up to the publication date. In this regard, the Commission intends to initiate ex parte action during the year 2018, against those defaulters, who, notwithstanding publication, have failed to file their Declarations of Income, Assets and Liabilities (Form A) and Statements of Registrable Interests (Form B).

Declarant Education

During the year 2017, the Commission continued to re-define and improve its education seminars in light of the information garnered from the Publication exercise conducted in the years 2016 and 2017, which showed a high level of non-compliance by the persons in public life. This resulted in a greater emphasis on the newly appointed State Enterprises/ Corporations/ Statutory Bodies. The members of these newly

Statutory powers used by the Commission in 2017, compared to the previous year

Power	2017	2016
No of persons in public life whose names were published in accordance with section 11(6) of the IPLA	935	663
Number of Declarations not filed by persons in public life	1233	1361

Figure 2: Number of names published in 2016 & 2017: Declarations outstanding per names Published

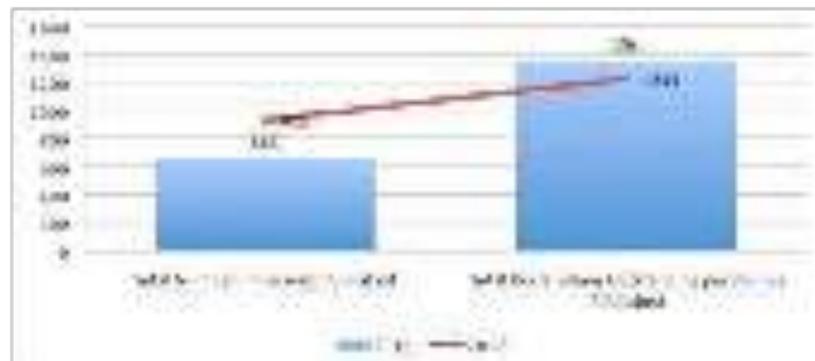


Figure 3: Number of names published in 2017, by year of declaration



appointed boards were targeted to ensure they were properly informed of their responsibility under the Act and also to build their capacity to fulfil their requirements under the Act. The Commission's consistent message to the persons in public life during the education seminars is 'Do the right thing always'.

During the reporting period, the Commission delivered twenty-two (22) Briefing Sessions to over one hundred (100) persons in public life. These institutions include the following:

- Arima Borough Corporation
- Chaguanas Borough Corporation
- Sangre Grande Regional Corporation
- Couva/Tabaquite/Talparo Regional Corporation
- Penal/Debe Regional Corporation
- Princes Town Regional Corporation
- Point Fortin Corporation
- Tunapuna/Piarco Corporation
- San Fernando City Corporation
- Port of Spain City Corporation
- San Juan/Laventille Regional Corporation
- Diego Martin Regional Corporation
- Education Facilities Co. Ltd
- Sports and Culture Fund
- National Training Agency
- National Institute of Higher Education, Research, Science and Technology (NIHERST)
- YTEPP Co. Ltd
- Institute of Marine Affairs;
- Accreditation Council of Trinidad and Tobago
- VMCOTT
- Tobago House of Assembly
- Permanent Secretaries

This represented a **73 percent** increase when compared to the previous year 2016 when six (6) Briefing Sessions were conducted. Figure 4 refers.

Of the twenty-two (22) Briefing Sessions delivered, fifteen (15) were evaluated to ensure quality assurance. A total of 85 percent of participants indicated that the information from the Sessions were informative and helped in understanding the requirements of the Act. The evaluation results showed a very high participant satisfaction with the Commission's Briefing Sessions and it is



Tunapuna Piarco Regional Corporation Chairman and Councillors at an Education Workshop

expected this would result in an increase in the rate of voluntary compliance and an improvement in the level of accuracy of the Declaration Forms submitted by the newly appointed persons in public life.

In addition to the focus on the Regional Corporations/ State Enterprises/ Statutory Bodies, the Commission conducted an outreach session on issues of ethics and integrity for students of the SITAL College, a tertiary education institute. Students were guided on business ethics as well as the role of the Commission in promoting good corporate governance.



Tobago House of Assembly (THA) Officials during a meeting with Commission representatives



Mayor, Aldermen and Councillors of the Chaguanas Borough Corporation following an outreach session with representatives of the Commission.



Figure 4: Public Education Seminars in 2016 & 2017

Confidential Meetings

The Commission provides consultative facilities in a confidential environment to assist declarants to comply with statutory obligations. During the period under review five hundred and forty (540) confidential meetings were held to provide guidance to persons in public life in the completion of their declaration forms and/or those who were required to provide additional information to the Commission. These results are similar with those reported in the previous year where five hundred and fifty (550) meetings were conducted.

The Commission also commenced a new initiative by providing assistance to Members of the Corporations in the month of May, 2017 on the completion of the Declaration Forms. The following Corporations were visited:

- Arima Borough Corporation
- Sangre Grande Regional Corporation
- Tunapuna/ Piarco Regional Corporation
- Couva/Tabaquite/Talparo Regional Corporation

Corporate Governance Sessions

In 2017 the Commission also included Corporate Governance sessions as part of its integrity education campaign with a view to providing an awareness of the importance of Corporate Governance in terms of the relationship between the Management of the Public Body, its Board (persons in public life) and its Stakeholders and how a good corporate governance image enhances the reputation of the organisation.

The audiences for the Commission's Corporate Government Awareness Sessions included Members of the Boards and Corporations as well as senior management staff of the organisations. The Commission deems this as a proactive approach in its aim to promote the ethos of good governance at the strategic and operational level. This, along with the other initiatives embarked upon by the Commission, will inevitably bring greater success in fulfilling its mandate.

Improving Compliance-Strategic Alliances

The Commission collaborated with a number of key stakeholders during the period under review as it relates to the Act and other related issues.

These strategic alliances were initiated to optimise the Commission's compliance outcomes as it relates to the following:

- An increase in the rate of voluntary compliance by these persons in public life;
- Improvement in the level of accuracy of the Declaration Forms submitted by the newly appointed and current persons in public life.

The Commission held strategic alliance sessions with the following:

Ministry of Finance

The Commission met with the Permanent Secretary and Management Team of the Investment Division, Ministry of Finance, the line Ministry (Corporation Sole) which is responsible for the State's portfolio of investments of which the State Enterprise Sector is a major element.

Head of the Public Service

The Commission met with the Permanent Secretary and Head of the Public Service with respect to the compliance by the Permanent Secretaries which resulted in the conducting of a Briefing Session for the Permanent Secretaries at their Monthly Meeting of Permanent Secretaries and Heads of Departments.

Ministry of Local Government and Rural Development

The Commission met with the Deputy Permanent Secretary of the Ministry of Local Government and Rural Development, the line Ministry responsible for Municipals and Local Government Authorities.

The following Table provides a snapshot of the resultant activity and its impact.

STRATEGIC INTERVENTION	RESULTANT ACTIVITY	IMPACT
Head of the Public Service	Briefing Session to Permanent Secretaries	50% improvement in the compliance by Permanent Secretaries who were published
Ministry of Local Government and Rural Development	Briefing Session to Port of Spain Corporation Arima Corporation Tunapuna/Piarco Corporation Sangre/Grande Corporation	New Councils Compliance rate - 80% Compliance rate - 64% Compliance rate - 70% Compliance rate - 67%
Ministry of Finance	Briefing Session to the Permanent Secretary and Members of the Management Team	Inclusion of the Commission in its Orientation session. Recommendations from the Commission have been included in the State Enterprises Performance Monitoring Manual

The following Table provides information on the resultant activity and its impact in relation to some of the Corporate Bodies visited with respect to the Briefing Sessions conducted by the Commission

STRATEGIC INTERVENTION	RESULTANT ACTIVITY	IMPACT
Institute of Marine Affairs	Briefing Session to Directors	Compliance rate - 100%
The Accreditation Council of Trinidad and Tobago	Briefing Session to Directors	Compliance rate - 60%

Register of Interests

The Commission, in accordance with Section 14 of the Act, compiles and maintains a Register of Interests, which provides information to the public of the personal and business interests of persons in public life and which may influence, or may be perceived to influence their judgement, deliberations or actions.

The Register of Interests contains information relating to a person in public life in respect of:-

- (a) Particulars of any directorships held in any company or other corporate body;
- (b) Particulars of any contract made with the State;
- (c) The name or description of any company, partnership or association in which the person is an investor;
- (d) A concise description of any Trust to which the person is a beneficiary or trustee;
- (e) Beneficial interest held in any land/real estate;
- (f) Any fund to which the person contributes;
- (g) Particulars of any political, trade or professional association to which the person belongs;
- (h) Particulars relating to sources of income; and
- (i) Any other substantial interest whether of a pecuniary nature or not, which he considers may appear to raise a material conflict between his private interests and his public duty.

During the year, eight (8) persons accessed the Register of Interests, which is consistent with what was obtained in the previous year (2016). The Commission has noted with concern the low number of requests to view the Register of Interests and is taking the necessary steps to address this particular situation.

8

inspections
of the Register
of Interests

PUBLIC EDUCATION AND COMMUNICATIONS

The Public Education and Communications Unit continued to foster education outreach with the school community to ensure that teachers and students understand and accept responsibility for 'doing the right thing always.' The Unit, in fulfilment of the Commission's mission to promote standards of integrity, engaged with the Ministry of Education's Curriculum Planning team through competitions on integrity in the school's visual and performing arts curriculum.

Additionally, the Unit is responsible generally for the following:

- Managing the Commission's website and Facebook account
- Maintaining newspaper records on matters of relevance.
- Providing communication support with the Compliance Unit for seminars/workshops for persons in public life.

Do Right Poster Contest Winners

Students from thirty-five (35) secondary schools participated in the Integrity Commission's 2016 Poster Design Project producing designs on the Integrity theme and practice in the Arts. The awards ceremony was held at the Commission's

Office in March 2017. The grand prize - the Chairman's Award of a trophy and \$2,000 in art supplies - was awarded jointly to San Fernando East Secondary School -- "*Do Right with the poor, the elderly*" and St. Mary's College -- "*Be Alert – Or Someone Gets Hurt.*" Runners up: second place Speyside High School, Tobago -- Abigail Melville- "*Be mindful of the needs of others*" and the Pentecostal Light and Life Foundation High School, Tobago -- "*Helping those in Need.*" Third place went to Naparima College -- "*The Struggle to keep Ethics and Integrity Alive*" and ASJA Girls College, Barrackpore with a design entitled "*Helping the poor and the elderly.*"



St Mary's College – "*Be Alert Or Someone Gets Hurt*"
(R to L), – Peter Ahloy, Che Antoine, Joshua Francois, Christian Lewis and Mrs. Marissa Ramdeem (Art Teacher).



San Fernando East Secondary School - "Do Right with the poor, the elderly" - David Ramlakhan



Top entries in the Secondary School's Do Right Champions Poster Design Competition. (L to R), St. Mary's College, San Fernando East Secondary, Speyside High, Pentecostal Light and Life High, Naparima College and ASJA Girls College, Bar-rackpore.

CONTINUING PARTNERSHIPS WITH STAKEHOLDERS

Members of the Commission partnered with and attended the Trinidad and Tobago Transparency International Anti-Corruption Conference at the Trinidad Hilton Conference Center, on Thursday 28th September, 2017. The former Chairman and senior members of staff attended the event. The theme of the Conference was *"Breaking free from a Culture of Corruption"* and featured international, regional and local speakers on issues of integrity and ethics.

The Public Education and Communications Unit provided information on the work of the Commission in a display booth.

Seminar for SITAL College Students

The Public Education and Communications Unit partnered with the Compliance Unit to deliver a presentation to students from SITAL College (formerly known as School of International Travel and Languages) as part of its "Youth-Navigation-Career Programme" on 17th February, 2017. The outreach sought to engender change among young persons and engaged participants on the role and responsibility of the Integrity Commission in promoting standards of integrity and the fight against corruption.

Pilot Project- Integrity Clubs (I-Clubs) in Secondary Schools

The Integrity Commission, in collaboration with the Trinidad & Tobago Transparency Institute and the National Parent/Teacher Association – with the support of the Ministry of Education - launched a Pilot Project to promote Integrity Clubs among students of Secondary Schools. The Integrity Clubs aims to support and encourage students to pursue the universal ethical values of respect, responsibility, honesty, fairness, integrity, compassion, moral courage and good citizenship in their everyday lives.

Hurricane Relief Drive

The Public Education and Communications Unit liaised with the Office of Disaster Preparedness and Management (ODPM) relative to providing relief to people in those Caribbean countries impacted by recent Hurricanes Maria and Irma which destroyed homes and businesses on those islands. As such, supplies were collected from members of staff and they were delivered to the Trinidad and Tobago Defence Force.

Hugh Wooding Law School Criminal Law Clinic

The former Chairman offered words of advice on issues of ethics and integrity in the legal profession to some students of the Criminal Law Clinic of the Hugh Wooding Law School.



Former Chairman of the Integrity Commission, Mr. Justice Zainool Hosein (Ret) as he addresses students of the Hugh Wooding Law School on their visit to the Commission.



Members of the Trinidad and Tobago Defence Force receive Hurricane Relief Donations from the Integrity Commission's staff members.

LEGAL

The Legal Unit provides support to the Integrity Commission in the execution of its core functions. The Unit provides advice to the Commission in relation to breaches of the Act and guidance in relation to the persons and entities defined as “persons in public life”. Advice is given to the Director of Compliance and the Declarations Sub-Committee on all aspects of the declaration process. The Director of Investigations is also provided with advice in relation to all aspects of investigations. This includes advice on issues surrounding evidence, witness interviews and the exercise of powers of investigation under the Act.

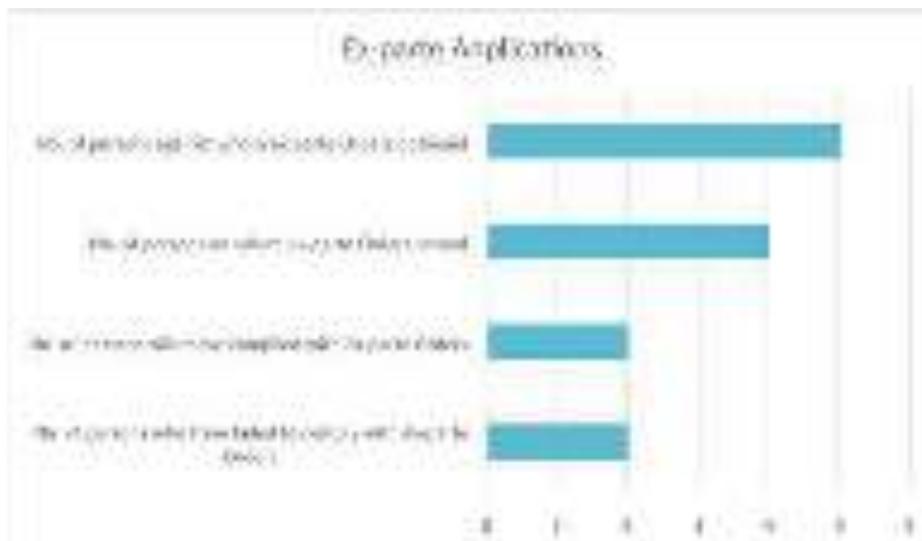
The Unit also prepares and files ex-parte applications at the High Court, serves Court Orders on defaulting persons and registers judgments at the Ministry of the Attorney General and Legal Affairs. The Unit has assisted in public education by presenting on matters relating to the Code of Conduct at sensitization seminars. Other pertinent functions of the Unit include the preparation of employment contracts and service agreements; the provision of support to senior management in negotiating contracts and agreements; development of policies

for internal use; review of Bills proposed by Parliament and other documents from various external organizations; and recommendations of amendments to the existing laws pertinent to the Commission’s objectives.

Ex-Parte Applications

During the period under review, the Legal Unit filed five (5) ex-parte applications at the High Court against declarants who failed to file their Declarations of Income, Assets and Liabilities and Statements of Registrable Interests, in accordance with Section 11 of the Act. The High Court granted Orders of the Court against the declarants to comply with the Act.

The Legal Unit also prepared seventy (70) additional ex-parte applications during the period under review. Although the Commission was unable to file these applications at the High Court during the period under review it hopes to do so within the upcoming year.



Registration of Judgments

The Integrity Commission was involved in three (3) court matters prior to 2017 where the judgments stipulated that cost was granted in its favour. As such the minutes of final judgments for costs were registered against the person against whom the judgment was entered. This was necessary to preserve the Commission's position as a judgment creditor.

The said judgments obtained by the Integrity Commission remain unsatisfied to date and the minutes of final judgments for costs. During the period under review they were re-registered in accordance with section 9(1) of the Remedies of Creditors Act Chapter 8:09 to prevent the judgment from becoming null and void.

The Integrity Commission is considering the options available to ensure that the person against whom the judgment was entered complies with the Orders of the Court.

Re-Assessment of the Status of Persons in Public Life

The Unit is re-assessing the status of persons who fall within the category of "persons in public life" as well as the status of statutory bodies and state enterprises as a result of the Court of Appeal decision in Telecommunications Services of Trinidad and Tobago Limited (TSTT) v The

Integrity Commission and The Attorney General of Trinidad and Tobago (Civil Appeal No. 30 of 2008). The decision in that case provided guidance on the factors to be assessed when determining whether members of a board are to be considered "members of the boards of...Statutory Bodies and State Enterprises including those bodies in which the State has a controlling interest."

Sensitization Seminars

The Legal Unit made presentations on the Code of Conduct at public outreach and sensitization seminars at the Tobago House of Assembly and to students of the Department of Political Science, Faculty of Social Sciences, University of the West Indies.

Fraud Policy

The Legal Unit continued working toward improving the organizational efficiency and ultimately the Commission's corporate governance. The aim is to continue to enhance the practice of good corporate governance within the Commission and improve transparency and accountability. In this vein, the Legal Unit developed a Fraud Policy which is aimed at facilitating the development of controls that will aid in the detection and prevention of fraud against the Commission. It is the intent of the Commission to promote consistent organizational behaviour by providing guidelines and assigning responsibility for the development of controls and conduct of internal investigations.

Commonwealth Caribbean Association of Integrity Commissions and Anti- Corruption Bodies

The Commission provided feedback and comments on the proposed Constitution of the Commonwealth Caribbean Association of Integrity Commissions and Anti-Corruption Bodies (CCAICACB). The CCAICACB is a regional anti-corruption body of which the Integrity Commission is an executive member and it seeks to promote standards of ethics and anti-corruption across the region.



The Commission was represented in Jamaica by (former) Chairman Justice Zainool Hosein (2nd from right back row) and Commission Member Mrs. Angela Young Lai (2nd from left front row) at a conference that discussed the challenges faced by CCAICACB.

HUMAN RESOURCE MANAGEMENT

The Human Resources Unit works to optimise the effectiveness of employees. To achieve the corporate objectives of reinforcing purpose and promoting integrity, the Unit provided human resource services for employees in Recruitment and Selection, Performance Management, Training and Development and Employee Relations. In an effort to boost productivity levels, the Commission sought to revise the organisational structure in 2017 to enable a more robust organisation with the requisite competencies to carry out its critical mandate, at present and in the future. This revised structure of the organisation is at the present time engaging the attention of the Public Management Consulting Division (PMCD), Ministry of Public Administration and Information.

Recruitment and Selection

The organisation established its Procurement Unit in November 2017. Additionally, the position of Deputy Registrar was filled within the same month.

Employee Relations

The Organisation held its annual Christmas luncheon at the Trinidad and Tobago Hospitality and Tourism Institute to honour past and present staff members.

Training and Development

The Human Resources Unit continued to provide professional development and training for the staff. The Commission's Director of Compliance participated in a course entitled "Singapore's Anti-Corruption Strategies" in Singapore during the period May 29, 2017 to June 2, 2017. The training course provided the following:

- An overview of the Framework of Corruption Control used to combat corruption in Singapore
- Understanding of the macro strategies used in corruption control in Singapore
- Application of the 3 E Approach - (economy, efficiency, effectiveness) - its process and how to achieve better "Value for Money" from the use of government resources in developing and enforcing anti-corruption strategies.

Two (2) members of the CCAICACB also attended the training course. The Integrity Commissions of Trinidad and Tobago and Grenada are Members of the CCAICACB which is comprised of the Heads of Integrity Commissions and Anti-Corruption Bodies from the Commonwealth Caribbean. During the training course participants from thirty-two (32) nations, including Albania, Botswana, Malaysia, Oman, India and Pakistan shared information on anti-corruption issues and how anti-corruption 'best practice' strategies may be adapted to fight effectively against corruption in the Caribbean.

The table below illustrates the full range of training and developmental activities undertaken:

PERIOD	TRAINING / CONFERENCES / WORKSHOPS AND SERVICE PROVIDERS	UNIT REPRESENTED
January-March 2017	Conducting Competency based Interviews - MPAC/GHRS Managing Work-Life Balance - MPAC Public Procurement - MPAC Sensitisation session on the requirements of the Public Procurement and Disposal of Public Property Act No. 1 of 2015 - MPAC Salary Administration - MPAC Mediation Skills - MPAC HRM Reform in the Public Service - MPAC / SCD Workshop on the Cash basis International Public Sector Accounting Standards (IPSAS) Compliant Statement of Receipts and Payments - MOF	Compliance Administration Procurement All Units Procurement HRM HRM HRM Accounting
April-June 2017	Working Paper Analysis - MPAC Public Procurement - MPAC How to design an Implementation Strategy - MOF / UNDP Customising the Procurement Handbook - MOF / UNDP IhRIS User Group Interactive Training Forum - IhRIS Singapore's Anti-Corruption Strategies - SCPTA / SIDSTEC Third Annual Conference of the Commonwealth Caribbean Association of Integrity Commissions and Anti-Corruption Bodies - CCAICACB	Accounting Procurement Procurement Procurement HRM; Accounts Compliance Executive Staff
July-September 2017	Responding to Parliamentary Questions - MPAC Public Procurement Change Agent Programme - MOF / UNDP 2nd Future of Democracy Conference - University of Bahamas Anti-Corruption Conference – Breaking free from a 'Culture of Corruption' - TTTI	Secretariat Secretariat Secretariat Secretariat and Core Units
October-December 2017	Ethics in Public Procurement - MPAC	Procurement

- MPAC – Ministry of Public Administration and Communications
- GHRS – Government Human Resource Services Limited
- MOF – Ministry of Finance
- IhRIS – Integrated Human Resource Information System
- SCD – Service Commissions Department
- SCPTA/SIDSTEC – Singapore Cooperation Programme Training Award/Small Island Development States Technical Cooperation Programme
- TTTI – Trinidad and Tobago Transparency Institute
- UNDP – United Nations Development Programme

INFORMATION TECHNOLOGY

The Information Technology Unit provides support to all employees in respect of the utilization of technology in all areas of work and to ensure the necessary software is available to staff to improve their performance.

During the review period, the organisation's Information Communication Technology service

provider deployed various internal and remote tools to resolve information technology related issues, such as:

- Upgrade of the network security system;
- Provision of technical support;
- Increased equipment and support services.

CORPORATE ADMINISTRATION

The core function of the Corporate Administration Unit is the management of business operations such as:

- Facilities Management
- Records and Inventory Management
- Contract and Lease Management

FINANCE AND ACCOUNTS

Section 9 (4) of the Act provides that: “All expenses incurred by the Commission for the purposes of this Act shall be a charge on the Consolidated Fund.” This provision in law brings the Commission under the operation of the *Exchequer and Audit Act, Chapter 69:01* and the Financial Regulations made thereunder. Within such a legal framework, the Commission receives its funding through direct charges on the Consolidated Fund as well as appropriations by Parliament through the annual *Appropriation (Financial Year 2017) Act, 2016*.

During the financial year, the Commission complied with all the directives from the Ministry of Finance, the Director of Budgets, the Comptroller of Accounts and recommendations of the Auditor General. The Registrar is the

Commission’s appointed Accounting Officer responsible, and accountable to the Minister of Finance, and answerable to the Public Accounts Committee of Parliament. The responsibility of Receiver of Revenue for the Commission also falls under the purview of the Registrar.

The Commission’s Annual Report focuses on activities during the Calendar Year (January to December), the Financial Report captures the expenditure for the Financial Year (October 2016 to September 30, 2017).

Table I provides a breakdown of funds allocated to the Commission and the expenditure incurred for the financial year 2017 while Table II shows the revenue received for the financial year 2017.

TABLE 1
PROVISION AND ACTUAL EXPENDITURE FOR THE FINANCIAL YEAR 2017
HEAD: 37 - INTEGRITY COMMISSION

SUB - HEAD	PROVISION FOR THE FINANCIAL YEAR 2017	ACTUAL EXPENDITURE FOR THE FINANCIAL YEAR 2017
01 Personnel Expenditure	\$ 2,104,440.00	\$ 1,759,148.82
02 Goods and Services	\$ 9,337,715.00	\$ 8,151,306.25
03 Minor Equipment Purchases	\$ 120,000.00	\$ 76,085.55
09 Development Programme	\$ 500,000.00	\$ -
TOTAL	\$ 12,062,155.00	\$ 9,986,540.62

TABLE 2
REVENUE RECEIVED FOR THE FINANCIAL YEAR 2017
HEAD: 07 - OTHER NON - TAX REVENUE

SUB - HEAD	REVENUE RECEIVED	DISBURSEMENT TO EXCHEQUER A/C
01 Administrative Fees and Charges	\$ 7,000.00	\$ 7,000.00
TOTAL	\$ 7,000.00	\$ 7,000.00

PROCUREMENT UNIT

In preparation for the full proclamation of the Public Procurement & Disposal of Public Property Act 2015, the Integrity Commission has adopted the new system of public procurement. This modern approach of public procurement is being used for engaging suppliers and contractors to provide goods and services.

In accordance with the Public Procurement and Disposal of Public Property Act, 2015 the Unit has completed the following in 2017:

- The Procurement Implementation Strategy;
- The Procurement Handbook for the Integrity Commission;
- The Procurement Code of Ethics for the Integrity Commission;
- The Procurement Code of Conduct for the Integrity Commission; and
- The Annual Procurement Plan, 2018.

Principles of Integrity

AS DERIVED FROM



THE CODE OF CONDUCT

IN THE INTEGRITY IN PUBLIC LIFE ACT, 2000

For the guidance of Persons in Public Life and
Persons Exercising Public Functions, You should:

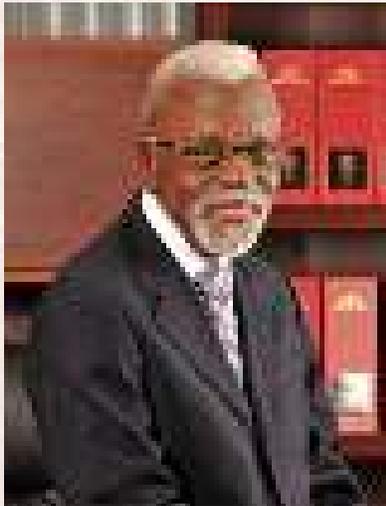
- Perform your functions and discharge public responsibilities in an efficient and effective manner
- Work hard and impartial in exercising your public duty
- Afford no undue preferential treatment to any person or institution
- Avoid any conflict of interest in public duties. It shall be deemed to exist in such cases, confidence and trust in your integrity
- Do not use your official position for private advantage or end of your own or your family or personal or financial interest or the interest of any person
- Not engage in any transaction that is incompatible with your official position and duty
- Not use public property or services for activities not related to your official work
- Not allow any duty or liability, save your official one, to prevail upon you
- Not use public funds in disregard of the Financial Codes of Conduct and other applicable regulations in such cases
- Not accept a fee, gift or personal benefit that is inconsistent with your official duty and the public interest of your office
- Do not use your official position to create any conflict of interest or making a decision where there is a possible or perceived conflict of interest

DO THE RIGHT THING ALWAYS!

For the full Code of Conduct, visit our website at:

www.integritycommission.org.tt

COMMISSION MEMBERS



Chairman Mr. Justice Melville Baird (Ret.)

Mr. Justice Melville Baird (Ret.) was appointed Chairman of the Integrity Commission of Trinidad and Tobago by His Excellency Anthony Thomas Aquinas Carmona, S.C, ORTT, President of the Republic of Trinidad and Tobago on December 15th 2017. Justice Baird holds the Barrister-at-Law Degree from the Honourable Society of the Middle Temple College of Law, London England. On his return to Trinidad he entered private practice as a Barrister of Law, He was subsequently appointed Magistrate, Chief Magistrate and then High Court Judge. Thereafter, he was appointed International Judge of the International Criminal Tribunal for the former Yugoslavia by the General Assembly of the United Nations. Justice Baird (Ret.) maintains keen interest in history and astronomy, is an avid reader of Greek and Roman Mythology and enjoys classical music.



Deputy Chairman Mr. Rajiv Persad

Mr. Rajiv Persad, an Attorney at Law in private practice, has had extensive practice at all levels in Criminal and Public Law (Constitutional Law, Human Rights and Judicial Review) Law of Tort, Contract and Commercial Law. He acted as High Court Judge of the Supreme Courts in Trinidad and Tobago, Grenada, the British Virgin Islands, St. Vincent and the Grenadines. He earned a Bachelor of Arts (History & Law) at the University of the West Indies, a Bachelor of Laws from Buckingham University and a Certificate of Legal Education from the Hugh Wooding Law School. He has a Certificate in Mediation. Mr. Persad has participated in several notable High Court trials, both Criminal and Civil



Mr. Pete London

Mr. Pete London is an Accountant and former business executive with a highly successful track record in logistics, operations, financial management, information systems development/implementation, profitability enhancement and strategic planning.



Mrs. Angela Young Lai

Mrs. Angela Young Lai, is a former Vice-Principal of Holy Faith Convent, Penal. She began her teaching career in 1968 at St. Joseph's Convent, San Fernando before moving to the Palo Seco Government Secondary School where she spent twenty seven (27) years in the teaching profession. She earned her Bachelor's Degree in Mathematics from the College of St. Benedict, St. Joseph, Minnesota, USA and a Diploma in Education from the University of the West Indies, St. Augustine. Mrs. Young Lai participated in several administrative courses and is involved in her community as a Lay Minister.

SUBMISSION OF REPORT

This report is submitted to Parliament, pursuant to Section 10 of the Integrity in Public Life Act, Ch. 22:01 on this 31st day of March, 2018.



Mr. Justice Melville Baird (Ret.)
Chairman



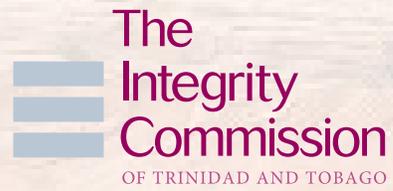
Mr. Rajiv Persad
Deputy Chairman



Mr. Pete London
Member



Mrs, Angela Young Lai
Member



The
Integrity
Commission
OF TRINIDAD AND TOBAGO



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