



ANTI-CORRUPTION COMMISSION
SEYCHELLES

ANTI-CORRUPTION COMMISSION SEYCHELLES

ANNUAL REPORT

2021



SUBMISSION OF THE ANNUAL REPORT

This Annual Report for the year ending December 2021, is submitted in accordance with Section 81 of the Anti-Corruption Act, 2016, which stipulates that: *“The Commission shall, as soon as possible after the expiration of each financial year and in any event not later than the 31st March in any year, submit to the Minister, and the Minister responsible for Finance, an annual report dealing generally with the administration and its activities during the preceding financial year and the Minister shall cause the report to be laid before the National Assembly.”*

Ms. May De Silva
Commissioner
Anti-Corruption Commission Seychelles



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LIST OF ACRONYMS

ACCS	Anti-Corruption Commission Seychelles
AFP	Australian Federal Police
AG	Attorney General
AML	Anti-Money Laundering
ANB	Anti-Narcotics Bureau
ASP	Agency for Social Protection
AU	African Union
BO	Beneficial Ownership
CAACC	Commonwealth Africa Anti-Corruption Centre
CFT	Countering Financing of Terrorism
DICT	Department of Information Communications Technology
DPA	Department of Public Administration
EU	European Union
ESAAMLG	Eastern and Southern Africa Anti-Money Laundering Group
FATF	Financial Action Task Force
FIU	Financial Intelligence Unit
IACCC	International Anti-Corruption Coordination Centre
ICAC	Independent Commission on Anti-Corruption in Mauritius
IMF	International Monetary Fund
ILEA	International Law Enforcement Agency
LEA	Law Enforcement Agency
MACMA	Mutual Assistance in Criminal Matters Act
MoE	Ministry of Education
MoFEPT	Ministry of Finance, Economic Planning and Trade
MIA	Ministry of Internal Affairs
MLH	Ministry of Lands and Housing
NAC	National AML/CFT Committee
NCA	National Crimes Agency (UK)
OAG	Office of the Auditor General



LIST OF ACRONYMS (cont.)

OECD	Organisation for Economic Co-operation and Development
PTA	Prevention of Terrorism Act
SADC	Southern African Development Community
SLA	Seychelles Licensing Authority
SRC	Seychelles Revenue Commission
TAC	Technical Anti-Money Laundering Committee
UNCAC	United Nations Convention against Corruption
UNDP	United Nations Development Programme
UNODC	United Nations Office on Drugs and Crime
WB	World Bank



Commissioner's Message



2021 saw multiple changes in our young institution. The first quarter saw the structural change in the oversight of the ACCS. The law was amended and the Board was removed to strengthen ACCS as an independent law enforcement agency with no ambiguity in its governance structure. In April, the Ethics Commission was merged with ACCS and three of their staff joined our growing team. Three cases were submitted to the Attorney General's office in March 2021, of which two were filed in court in October 2021. In July, an Advisory Council of four team members were appointed to provide support to the Commission. In October, the Public Persons (Declaration of Assets, Liabilities & Business Interests) function was transferred to ACCS but there are some outstanding administrative issues which have delayed the work for this function. This will not be reported in this annual report as there were no ACCS activities in the last quarter of 2021. The EU funding was extended in September and this included additional funding for technical support for the Investigations team, prosecution and media experts.

As a young entity, ACCS approached its milestone in November and delivered its anticipated Black Iron (\$50M case) to the people of Seychelles. By December, six people had been arrested as part of the Black Iron operation and three people bailed in the SBFA cases being overseen by the AG's office. This is a huge achievement by any Anti-Corruption Agency standards. Most corruption and financial crime cases take on average four to five years to investigate and a further three years for the trial phase to conclude. ACCS is a small law enforcement entity with a total of 15 investigators, 3 Prevention officers and 14 support staff who worked tirelessly whilst learning on the job to complete some small cases and educate the public. This work continues just as the staff training and development does. Expectations were high, the public were impatient, staff were demoralised but the focus was to always deliver.

In the last five years we have built a strong network of key partnerships in the law enforcement, technical aid sectors and NGOs such as Transparency Initiative Seychelles. This enabled ACCS to strengthen its position and seek the right financial and professional support from the EU, Commonwealth and the UK government, Australian Federal Police, UNDP, World Bank, and last but not least, the International Anti-Corruption Coordination Centre (IACCC) which is based within the National Crime Agency UK. This strategic approach was key to our success. With limited human and financial resources, it was right to seek specialist help within the international support network we had engaged with.

I would like to extend my gratitude as head of ACCS, to all our local and international partners and the dedicated staff team. They are key to our success and we recognise their contribution in the past five years of my mandate. The institution has set new standards in law enforcement and we aim to maintain them and continue to improve in order to maintain our standing on Transparency International's Corruption Perception Index and the World Bank's Corruption Index.

Ms. May De Silva
Commissioner
Anti-Corruption Commission Seychelles



Highlights of 2021

STRATEGIC HIGHLIGHTS

Anti-Corruption Act amendments strengthened the remit of the ACCS. This included prosecutorial powers, a streamlined Advisory Board and power to restrain assets under the AML/CFT Act. Created a Financial Forensics Department to run parallel financial investigations according to international best practice.

FINANCIAL HIGHLIGHTS

- Additional funds for nine new investigators (six for operation Black Iron), Principal Counsel, part time Prosecutor and part time communications officer, new offices to include control centre, interview rooms, exhibits room and IT equipment.
- EU Technical Aid extended from September 2021 to August 2022 which will fund the new ACCS' Case Management System for Investigations whilst funding from the UK government will cover the costs of digitisation of the declaration of assets by public officers as per the Public Officers and Ethics Act as amended in April 2021.
- A revised budget to include unexpected costs for partnering with the Police Service in providing security and associated costs for ACCS remandees, legal and specialist officers.
- Focus on realisation of stolen assets returned to the people of Seychelles.

LOOKING AHEAD

Looking ahead, we will continue with our Prevention Programme which is key to eliminating corruption in Seychelles. Seychelles is 23rd least corrupt country according to Transparency International's Global Corruption Perception Index. We can maintain this standard, with continued capacity building within the institution and partnering with the government training agency and our educational establishments to highlight the need for specialist workers in the field of financial crime including digital forensics, forensic accounting, prosecuting counsels and asset recovery to name a few. The lack of qualified professionals is a national issue and we look to our leaders to review our manpower needs and encourage our young people to choose a career path which will fulfil the professional needs of our country.

As mentioned under the Financial Highlights section, we aim to modernise our IT system, operate a state-of-the-art Digital Forensics Lab loaned by NCA UK and digitise the declaration of assets for all public servants in 2022. This will form part of our Case Management System which has been funded by the EU and the UK Government. We will focus on mentoring and staff development to build a stronger and professional law enforcement institution in the region.

Commission Characteristics

On 27th February 2004, Seychelles signed the “United Nations Convention Against Corruption” (UNCAC). On 16th March 2006, Seychelles ratified the Convention which made it a legal obligation to implement the Convention.

Article 6 (Preventive Anti-Corruption Body or Bodies) and Article 36 (Specialized Authorities) of the UNCAC emphasises the importance that every signatory country establishes at least one anti-corruption body and “specialized authorities of ethics” in accordance with their own legal systems, and endows them with the “necessary power of independence.”

The Anti-Corruption Commission Seychelles was established after the enactment of the Anti-Corruption Act, 2016 in March 2016 by the President and the National Assembly.

It is a self-governing, neutral and independent commission under nobody’s control, authority or direction and is mandated to investigate, detect, prevent and prosecute corrupt practices.





MISSION STATEMENT

MANDATE

To *Investigate, Detect, Prevent and Prosecute* corrupt practices in the government sector as stipulated in The Anti-Corruption Act, 2016.

VISION

To be a robust institution that fosters a corruption-free society in an environment of integrity, accountability and transparency.

MISSION

To fight corruption through effective investigation, detection and prevention of corrupt practices for a corruption free Seychelles.

CORE VALUES



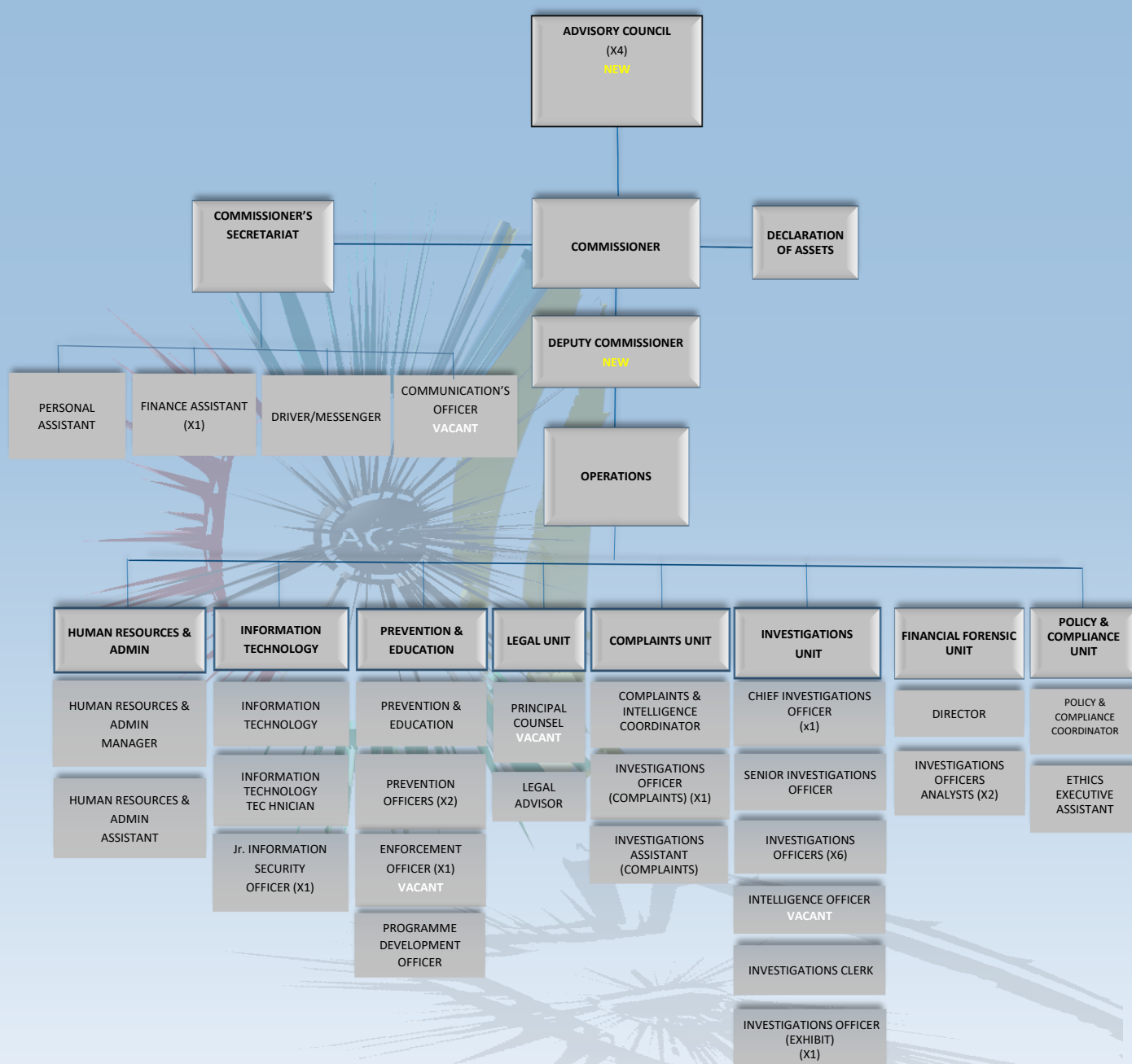


The Commission Structure

The ACCS is comprised of five functional units, a Prevention Unit, which also carries out the educational function; an Investigations Unit, a Financial Forensic Unit; a Complaints Unit and Policy and Compliance Unit. In conjunction, ACCS Corporate Services include an Information Technology section, a Human Resource and Administration section and a Finance section to assist the functional departments.

ANTI-CORRUPTION COMMISSION SEYCHELLES

ORGANISATIONAL STRUCTURE





Commissioner

In accordance with Section 6 of the Anti Corruption Act the Commissioner is appointed by the President upon the recommendation of the Constitutional Appointments Authority (CAA).

The recent amendments to the legislation change the title of the head of the ACCS from Chief Executive Officer to Commissioner. The Commissioner is responsible for the control, direction and administration of the Commission as set out under section 6 (2).

ACCS Advisory Council

Between January and April, the ACCS was overseen by the Board of Commissioners:

Justice Duncan Gaswaga - Chairman

Daniel Belle - Vice Chair

Michel Felix

Nisreen Abdulmajid

Priscille Chetty

Marie Claire Elizabeth

Hardy Lucas

It is worth noting that Ms Abdulmajid and Ms Priscille Chetty refunded their salary for March and April 2021 as the Board didn't meet for those two months.

Following the dissolution of the Board of the Anti-Corruption Commission in April 2021 an Advisory Council was formed and is comprised of a chairperson and three other members.

The members of the Advisory Council were appointed by the President in accordance with Section 10 of the Anti Corruption Commission Act, following recommendations of the Constitutional Appointments Authority (CAA).

Bernard Pool - Chairman

Angelique Antat

Damien Thesee

Dyane Azemia

The functions of the Advisory Council are set out in section 11 of the Anti-Corruption Act, 2016 and involve overseeing the administrative policy of the ACCS and review and recognize legislative provisions for the prevention of corruption with recommendations to the President. As yet no recommendations have been forwarded to the President .



COMPLAINTS UNIT



Overview

The Complaints' Unit is under the direct authority and control of the ACCS Commissioner and derives its mandate from section 52 (1), (2) & (4) of the Anti-Corruption Act.

Its main functions are to :

- Receive and register complaints made to the Commission by an individual or Authority.
- Report complaints made to the Commissioner for consideration.
- Carry out preliminary inquiry in cases upon approval and recommendation by the Commissioner.
- Undertake intelligence work related to cases or based on information.

The Complaints Unit is separated from the Investigations Unit so as to ensure transparency in investigation of cases. Once there exists primary evidence in a case, the case is forwarded to the Investigations Unit for further inquiries.

The Complaints Unit may conduct a complete investigation only in circumstances authorized by the Commissioner.

Structure

The Complaints' Unit is comprised of an experienced Complaints and Intelligence Coordinator, an Investigating Officer and an Investigations Assistant.



Highlights of 2021

Though partly hampered by the impact of Covid 19 2021 can be summarized as a positive year with some noteworthy improvements to internal monitoring systems in an effort to better keep track on complaints made, properly manage investigations of complaints and record of statistics.

All in all, our service and response to both our internal and external stakeholders improved significantly. In general terms, the number of complaints received in 2021 decreased in comparison to last year which continues the trend since 2019. This has decreased significantly in comparison to 2017 and 2018 when the ACCS came into existence. On average a total of 28 cases are being recorded per year for the past three years and in light of the increasing impact of the ACCS and public confidence we expect to see that increase going forward.



CASE PROCESSING SUMMARY

Case Inventory

The Complaint's Unit has a complete inventory of all cases received since 2017. This database places the Unit in a better position to respond to queries pertaining to cases and allows the Unit to gather a clearer intelligence picture and where appropriate look towards developing proactive investigations and integrity tests.

Cases warranting investigation

In 2021, six cases have been forwarded to the Investigations Unit. Excluding the six cases, one case is a joint investigation case with an outside agency.

The complaints Unit has been given authorization to investigate nine cases, eight of which are related cases.

Closed Cases

The Complaints Unit has been able to review and close some past cases. A total of seventeen 17 cases have been closed during the year under review with 13 cases being cases for the year 2018. Only one case has been closed for the year 2021 which involved a suspicion of abuse of position following false information given by a tourist to an Immigration Officer who dealt with the matter correctly. A Prohibited Immigration notice was given to the visitor which was later revoked causing consternation, and a leaked complaint. No criminality was found but a subsequent review of internal proceedings was launched to strengthen the Ministry policy on P.I notices. There are no outstanding cases with the Complaints Unit for the year 2017.

Case Management System (CMS)

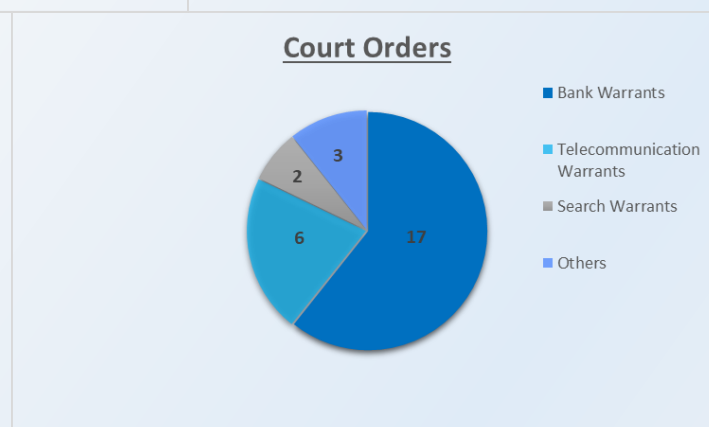
Following a training session with the World Bank, a CMS has been introduced this year within the Complaints Unit involving a timeliness review mechanism, and comprehensive monitoring and evaluation system. The purpose is to keep cases updated and generate greater efficiency. Although the impact of COVID and the pressure of prioritization of resources has remained a constant challenge in developing the incoming complaints and finalizing cases where appropriate there has been some progress on the cases.



Statistics for the year 2021

The Complaints Unit has managed to update its statistics especially with regards to cases registered, forwarded to the investigations unit and cases closed. However, we are yet to develop a mechanism to follow-up on cases closed at investigations level and/or forwarded for prosecution. It has therefore been agreed that the statistics need to be upgraded and centrally held which will be developed in 2022. Therefore, there is a need to find a way to improve on that.

In 2021, the Unit registered 23 cases and issued 28 court orders including banking, telecommunications and search warrants.



Statistics Breakdown

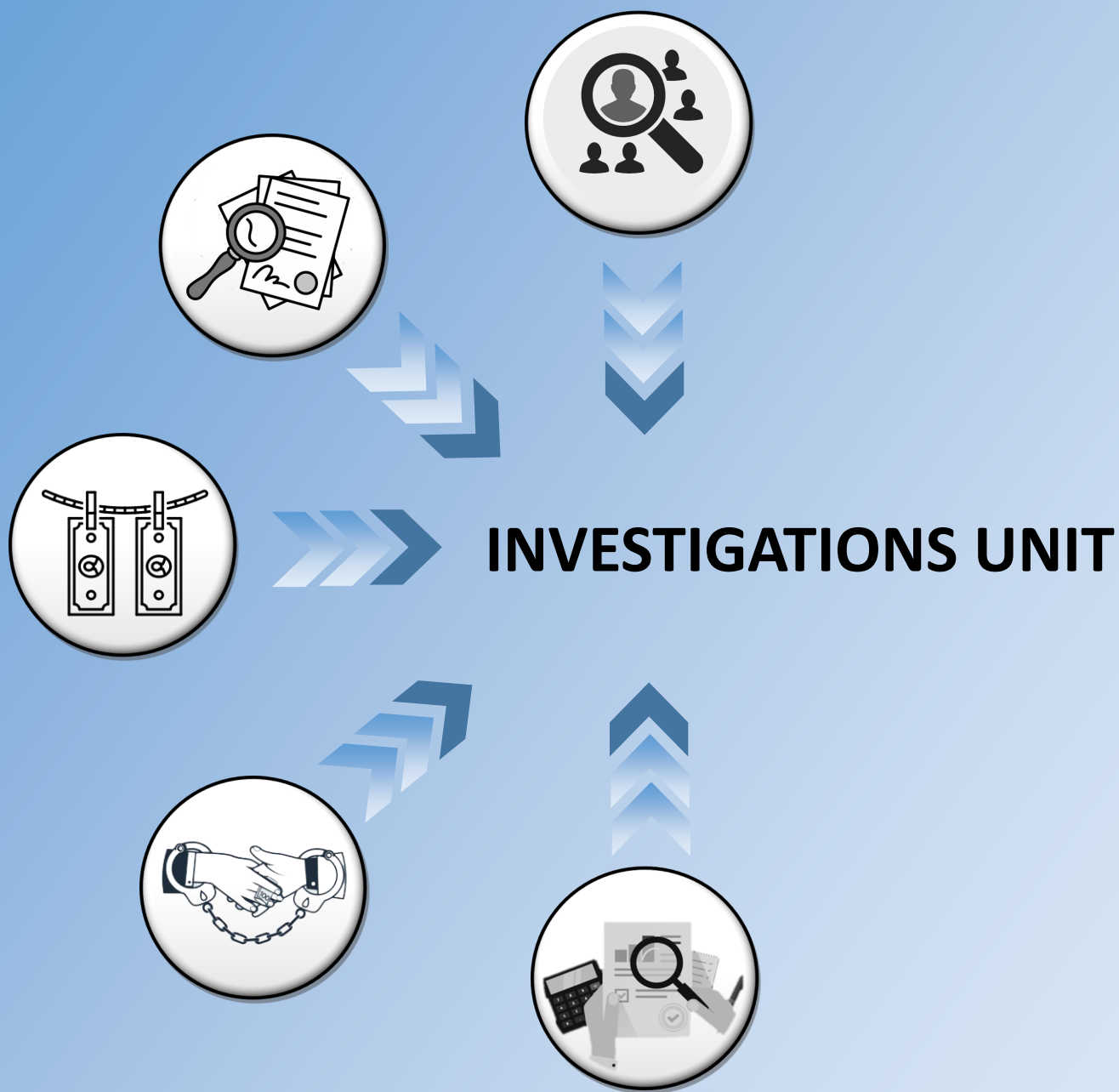
The breakdown of statistics is proving to be a challenge. We are yet to put a mechanism in place in order to ensure that we maintain proper records of all interviews/requests/court orders etc., as such are now being requested in great volume. Sometimes this can be easily omitted depending on the duties being undertaken as we do not have a dedicated person to undertake such tasks.

Challenges

Over the year there have been many competing strains on internal resources and currently the timeliness for resolving complaints is unsatisfactory. Some contributing factors are the delay in agency responses (through requests or requests for assistance), the impact both internally and externally of the pandemic and limited resources in terms of staffing resources. There is a realisation both internally and across the ACCS that to retain public confidence we have to reduce the number of cases from previous years and give more information to the public regarding the reasons why complaints that are not proceeded with. Resolving a case in a timely manner has more advantages than disadvantages, and in freeing up resources following considered decisions in a timelier manner with the increased support of government ministries we will improve results and increase public confidence in the ACCS.

Way Forward

Following the introduction of the case management system and an internal gap analysis the Complaints Unit will seek to improve its outputs in carrying out its preliminary investigations in a more timely fashion with more focused prioritisation. The Complaints Unit will work with the Investigations Unit and Legal Office to develop a streamlined standard operating procedure and ensure wider adherence to the CMS to reduce the number of cases and attempt to resolve the cases at a quicker pace.



Overview

The Investigation Unit is mandated to conduct enquiries and investigations in allegations and suspected offences under the Anti-Corruption Act 2016, Section 22(2), (a). Subject to the Anti-Corruption (Amendment) Act, 2019 ACCS now may investigate or take or continue the investigation of offences provided under Chapter X and Chapter XXXVIII of the Penal Code (Cap 158). The investigation unit is also mandated to enquire into and conduct investigation of offences of money laundering committed in furtherance of corrupt practices.

Resources and Structure

Members of staff have mixed experience from policing and civilian backgrounds with experience in criminal investigations, commercial crimes and fraud investigations, proceeds of crime investigations, asset recovery, financial analysis, banking compliance, offshore banking, Bureau De Change, procurement, immigration, crime scene, crime scene photography, human resources, commercial banking, development banking, loan project appraisal and accounting.

The Investigation Unit currently have thirteen staff, led by a Chief Investigations Officer, ten investigators, an investigations assistant and one Investigations Clerk.

The majority of the reporting year was dedicated to preparation and culminated in high profile arrests following a number of property searches. As a results resources have been prioritized in aa unprecedented manner, whilst still maintaining coverage on other high profile investigations.



Requests sent to and responses received

Recipient	Request	Response
FIU	9	1
Registration Division	6	3
SLA	12	3
DICT	1	
Seychelles Police	3	1
DPA	9	4
Immigration & Civil Status	1	1
ASP	3	3
MLH	1	1
SRC	2	
MoFEPT	1	
Central Bank	1	
MoE	1	1
MoFEPT -Finance Dept	1	
MIA	2	2
Total	53	20

Table: No. of requests sent to and responses received from various establishment

Responses and correspondences from most establishments are positive, however, we are encountering some delays, with the main reason being staff on quarantine due to Covid-19 pandemic. We have however a good working relationship with most establishment.

Memorandums of Understanding

ACCS have signed four more MoUs.

- ACCS/Seychelles Revenue Commission
- ACCS/Financial Services Authority
- ACCS/Ministry of Finance
- ACCS/The Office of the Registrar General

Warrants Executed in 2021

Type	No.
Search	6
Bank	11

Preliminary findings Types of Corruption

- Embezzlement
- Unlawful Gratification
- Abuse of Position
- Non-Disclosure of Interest
- Unlawful Acquisition of Public Funds & Public Property
- Conspiring with a person to commit an offence and attempt to commit an offence



Crime Overview

2021

Brought Forward	Received in 2021	Total	Ongoing	Recommended for closure	Closed	Submit for Prosecution
55	5	60	43	7	7	3

The Investigations Unit (IU) has made a significant improvement in 2021 with two cases submitted to the Attorney General's Office and a total of three filed in court. Following the amendment of the Anti-Corruption Act empowering the ACCS to prosecute cases, the further case was charged at the end of 2021. Trials are scheduled to take place later in 2022 and others will, in all likelihood be in 2023.

The evidence gathering process does not stop once charges have been laid and the ACCS will continue to review the material in the corruption and related cases to ensure that justice is done and seen to be done. Whilst this is a vast undertaking in itself to be trial ready, we will continue to adopt international best practice and support for our investigations where many stripped assets remain overseas, use legislation lawfully yet innovatively and ensure we work with the public to prevent and pursue corrupt public officials.

In 2021 the IU received five new cases which are being developed from an evidential point of view. These sensitive cases relate to substantial corruption allegations as per the mandate of the ACCS, and whilst they are being thoroughly investigated through lengthy enquiries, they will not be rushed. The number of cases brought forward from the previous years continues to decrease due to the hard work and diligence of the investigation team. Further work to reduce the backlog needs to be done and prioritisation processes are being put in place, despite the already stretched resources focusing mainly on the larger cases now in court.

Achievements

- Three cases filed before the Supreme Court awaiting trial.
- 30 suspects arrested and interviewed in 2021.
- The progression of investigation of cases received in previous years continue to improve.
- Good working relationship with the Attorney General Office, Police and other agencies.

Challenges

- The number of historical cases remaining in our CMS
- The effect of the Covid-19 impacting on deadlines set for review of cases.
- The \$50m theft allegation has considerably reduced our ability to work on other investigations which is adding to the delay in processing other outstanding investigations. Lack of adequate vehicles and equipment to conduct thorough and timely investigations

Way Forward

Cases

Our aim in 2022 is to complete more investigations to submit to the ACCS legal team for consideration against the evidential and public interest threshold for prosecution.

We will endeavour to reduce the backlogs further whilst ensuring the best evidence continues to be gathered in the cases before the Supreme Court. We will continue to increase public confidence in the ACCS and the criminal justice system by showing that no one is immune from investigation and prosecution and seek to bring the corrupt individuals before the courts. We will work with our colleagues in the Financial Intelligence Unit and Financial Crime Investigation Unit, as well as our partners overseas, to ensure that the stolen assets and proceeds of corrupt and criminal conduct is returned to the nation. This will take time and patience, as well as involve many legal challenges, but we will act robustly in order to succeed.

Training

Given the complexity and challenges in corruption investigations, as well as the need to keep pace with state of the art technology used by criminals and corrupt individuals training is a key part of our continuous professional development and recruitment process. We are seeking to develop further training collaborations with our fellow anti-corruption agencies in Africa and further develop our partnerships with the UK's National Crime Agency, Australian Federal Police, the Federal Bureau of Investigation and the International Anti-Corruption Coordination Centre.

ACCS now have the mandate to investigate money laundering and can forfeit unexplained property under Section 62 of the AC Act. Hence, training on money laundering investigation and asset forfeiture is a strong requirement.



Facilities and Office Space

Adequate interview rooms to allow investigators to conduct interviews at any given time.

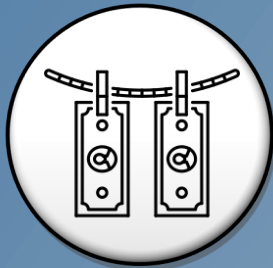
More office space required to accommodate the continuous increase in number of staff.

Vehicles

Adequate vehicles to allow investigators to conduct more investigation.

Change of investigation process

In 2020, we introduced a new structure and new process of investigations. We introduced a team of investigators and one team of analysts. Investigators and analysts are sitting in separate offices. After perusing the files received from Complaint Unit, cases are being allocated to Analyst Team for inspection, and analysis of all financial documents for recommendation. After completion of same, cases are referred to Investigation Teams for further investigation or recommend closure at Management level. After the cases have been assigned to investigators, they seek further advice from an analyst staffs.



FINANCIAL FORENSICS UNIT





Overview

The Financial Forensics Department is a new department that supports the Investigations Unit with the financial side of their investigations. Whilst the investigators are engaged in gathering evidence in support of the offences being investigated, the Financial Analyst in the Financial Forensic Unit conducts investigations that tie suspected financial transactions with the offences. In investigations term, this best practice parallel investigation is called ‘following the money trail.’

Resources and Structure

The department was formed in April 2021 and is headed by a Director of Financial Forensics who is assisted by three Financial Analysts.

Aside from the financial analysis, the department also supports with other functions, including requests for information in support of investigations, preparation of International Letter of Requests (ILOR) to jurisdictions outside of Seychelles and liaison with other Law Enforcement Agencies, both local and international.

Achievements

The department has been instrumental in supporting the investigations team with financial analysis in a more structured manner than was being done previously. Each of the investigations team has an Analyst attached to support with financial investigations and producing appropriate reports to prove the offences under investigations.

The department has also been lending considerable support to the Black Iron operation since it was initiated and the lengthy but vital enquiries are ongoing.

Challenges

Being a new department, the main challenge is to ensure availability of appropriate resources to support the increasing numbers of more complex investigations that the ACCS has to take on. Continuous professional development is important to keep pace with the criminals and to be able to present evidence in court in an easily understandable fashion.

With increasing workload, additional high calibre staff would be required to ensure investigations are timely and brought to prosecution swiftly. The possibility to recruit a qualified Forensic Account to support the team with ongoing investigations would greatly improve the work output and reap immediate benefits .



PREVENTION UNIT

Overview

The Anti-Corruption Act, 2016 allows the ACCS, Educational and Preventative functions in Part II under section 5.1, to include raising awareness, promoting the values of honesty and integrity, organising trainings and workshops and performing any other duty as may be considered necessary for the prevention of corruption.

Strategic Area 2 of the ACCS STRATEGIC PLAN 2017 - 2023 addresses Corruption Prevention, of which its Strategic Objective is “To reduce on the prevalence of corruption and economic crime”

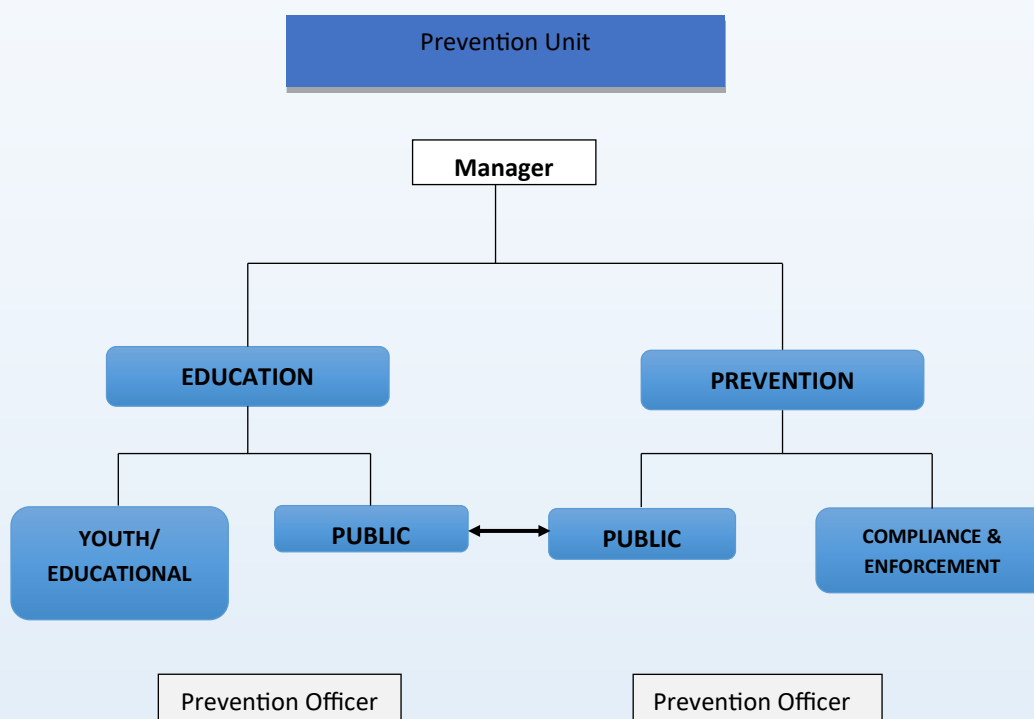
The principal functions include reviewing and recognising provisions of laws for the prevention of corruption, identifying the various causes of corruption in the context of socio-economic conditions. We also educate, coordinate or co-operate as applicable, with the institutions authorised and the community on ways to prevent and combat corrupt practices so as to implement an integrated approach to the eradication of corruption.

Our objectives are to also identify internal control weaknesses vulnerable to corruption and opportunities for improvement.



STUCTURE

The current staffing in the Prevention Unit comprises of a Manager and two Prevention Officers.



Strategy: Promote anti-corruption public education, training and awareness

Activity 1: Together with Partners, conduct public education.

Strategy: Promote ethics, integrity and corruption intolerance in public, private and civil society sectors

Activity 1: Mainstream anti- corruption ethics and integrity in public and civil society sectors

Prior to each awareness session we conduct online research on the organisation to gather information such as their legislations, mission statement, vision and any policies that inform on corruption that they may have. We also look at our own CMS to see where there may be intelligence regarding the institution in order to deliver appropriate interventions and create scenarios.

A pre-session meeting is then held with the head or senior management team of each institution to customise the presentation to each organisation's need to discuss the following points:

- Staffing numbers and specific duties
- Aims and objectives of the sessions
- Policies in place
- Types of corruption the organisation is susceptible to.
- Way forward after the sessions

For the year ending 2021, pre-session meeting were held with two ministries and three public institutions in preparation for Anti- corruption Awareness sessions that were planned.





Anti-Corruption Awareness sessions

Although the continuous problems of the COVID-19 pandemic impacted throughout the year, the Prevention Unit managed to achieve its target set for Anti-Corruption Awareness sessions for the year. A total of twelve institutions were targeted for 2021 and the Unit managed to conduct 19 sessions with five public institutions.

- Department of Employment - 6 sessions
- Agency for social protection – 2 sessions
- Department of Social affairs - 6 sessions
- Department of Immigration and Civil Status -3 sessions
- Seychelles Revenue Commission – 2 sessions

Objective:

The objectives of the session are as set by the ACCS STRATEGIC PLAN 2017 - 2023, to *promote ethics, integrity and corruption intolerance in public, private and civil society sectors.*

- Raise awareness against corruption and corrupt practices
- Equip participants with a good understanding of what corruption entails .
- Empower individuals, communities and governments institutions.
- Assist in building institutional capacity and improving service delivery.
- To encourage governments to work more efficiently:
 - ⇒ For greater government accountability and transparency
 - ⇒ To help the entire society participate in building an enabling environment for equitable and sustainable growth
 - ⇒ In a timely and cost-effective service delivery to its public.

Methodology

- PowerPoint Presentation
- Open discussion on the topic
- Pre and post-session questionnaires

Participants are provided with a questionnaire before the session and the same set of questions after the session to evaluate their level of understanding and effectiveness of the session.

Participants are made aware of the aim of the session, including the strategic objective and the major activities of the ACCS derived from its Strategic Plan . The participants are also informed about the United Nations Convention Against Corruption (UNCAC) which Seychelles signed in 2004 and ratified in 2006 and the powers under the Anti-Corruption Act, 2016.

The other slides provide the definition of corruption, the rationalisation behind the corrupt practices and its adverse effects.

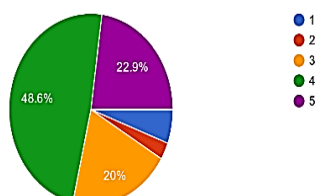
Having a code of conduct and anti-corruption policies and procedures are also promoted and emphasised on. The participants are also made aware of the different legislation/policies/ measures and legal structures that address corruption and related offences. The Gift and Hospitality policy is also extensively. We are happy to discuss our Anti-Corruption Awareness Sessions.



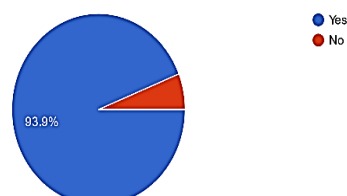


An example of session feedback from 2021 is shown below.

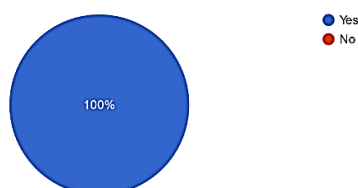
1. On a scale of 1 to 5, how would you rate your knowledge of corruption? (5 being very good)
35 responses



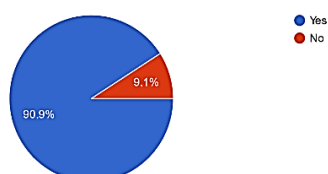
3. Based on this training, do you feel that corruption exist in your organisation?
33 responses



7. Was the session beneficial to your work?
34 responses



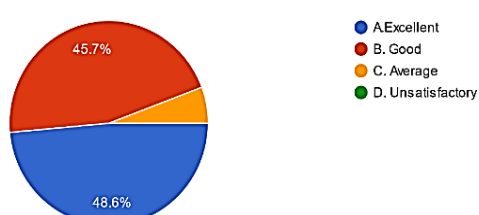
8. Is there anything which has changed your perception, attitude or behavior as a result of the training session?
33 responses



9. Refer to question 8 (If yes) Provide at least one concrete example

- Knowing the types of corruption and its effects
- To report corruption
- To be more attentive to signs of corruption
- Corruption is everywhere and it is our responsibility to prevent it
- To report corruption if there is in my workplace
- To be able to identify corruption when it does occur
- There should not be any act of corruption because it will bring downfall in our economy
- Has changed how I see things in my organisation
- Try to obtain any form of gifts or financial benefits and in return get favours
- Create awareness in our society
- Try to follow proper procedures that are in place
- To work in accordance to my organisation's code of ethics without any conflict of interests

12. What is your overall impression of this training?
35 responses



Strategy: Set policies, systems, procedures and practices of work in public institutions

Activities: Conduct examinations to identify and seal corruption loopholes

One of the main activities planned for the year was the Corruption Risk Assessment in public institutions.

This involve working with the organisation/institution to analyse where its exposure to corruptions risks is, collect relevant data and information on why and how corruption risks may occur.

This was to include the reviewing of policies, system, procedures and practices of work and to make recommendation to address them as describes under Section 17 of the *Anti-Corruption Act, 2016*

Two institutions were targeted for the year 2021 but unfortunately such activities were not materialise because of COVID-19 pandemic and subsequent health restrictions. These will be held in 2022.

Strategy: Set policies, systems, procedures and practices of work in public institutions

Activity 1: Provide advisory services on corruption prevention.

The Prevention Unit has provided advisory services to one government department. Request was made by the department itself and the Investigations Unit following preliminary findings and Audit reports from the Ministry of Finance, Trade and Economic Planning, Financial Planning and Control Division

Assistance was sought by the department to help in re-examining the structure of how funds are collected and manage and to eliminate further possibilities of corrupt practices.

Form the initial meeting, the Prevention Unit was informed there are other governments departments involved, which will need to be visited in 2022.



Education Sector and the Youth

School children need to know how corruption is eroding our society and social norms. It is very important that young minds get sensitised about corruption so they know how to tackle it when they face such a situation. Not forgetting that a child gets a taste of subtle bribery at home itself when parents offer a reward provided their demands are met, or for doing chores which is supposed to be part of their normal growing up. Therefore, they need to understand that giving bribe at smaller levels to get the work done is ethically wrong. Equally, they need to understand that they are part of the same society, which is plagued by corruption, and thus should be part of the change they want to see.

The youth need to understand that corruption is linked with the purpose of the civic service, ethical and legal requirements for civil servants.

Anti-corruption education at school is addressed both formally and informally.

At the formal level, the elements of anti-corruption education are included in the curricula of general education.

At the informal level, it is promoted through civil campaigns, pupil conferences, symposiums and talks, poetry, essay, posters and short videos competition.

We must take into account that every time a suggestion is made to include new topics into the curriculum of general education, there is always a concern that there are too many programmes already and too little time to cover them.

One way of dealing with the issue is clearly formulating and stating the problems of anti-corruption education and creating a separate module of several lessons. Another way of presenting the subject is to discuss it as a part of other topics and problems, presenting it as an illustration or specific action of a certain case. What is important is that anti-corruption education or other related issues should not be taught separately from other associated topics.





Education Sector and the Youth

Strategy: Promote anti-corruption public education, training and awareness

Activity 1: Develop relevant anti-corruption literature and programmes.

Due to the health restrictions and as a result of the COVID-19 pandemic and the limited time allocated for academic programmes all of the onsite activities planned for schools did not materialise in 2021.

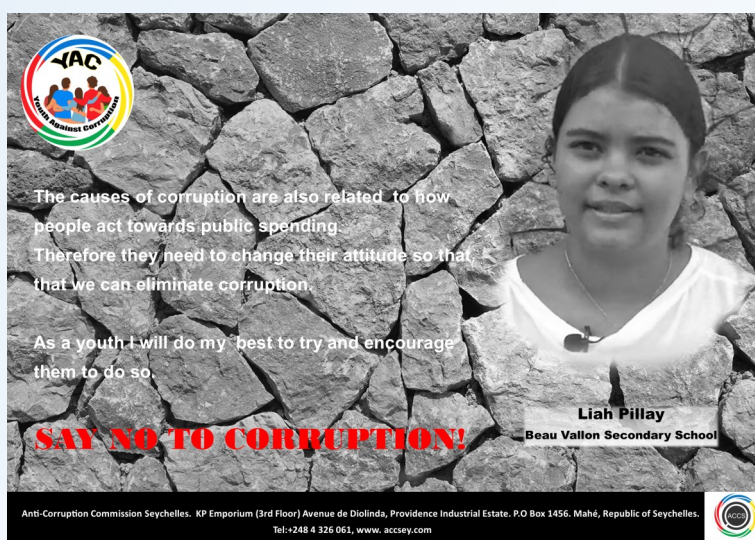
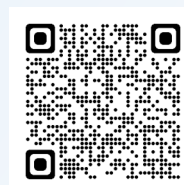
However work on a module/ programme on Integrity and Anti-Corruption which will be integrated in the PSCE (Personal, Social and Citizenship Education) curriculum programme has been developed.

The module includes activities aimed at promoting Integrity and Anti-Corruption.

In the coming year the module will be presented to PSCE teachers of the Ministry of Education in a working session with the Prevention Unit for further discussion before seeking the approval and authorization of the ACCS and the Ministry of Education.

An online anti-corruption awareness quiz has also been developed using google forms for the youth which will be rolled out in January 2022

https://docs.google.com/forms/d/1G5NjzZtcBa_FU6ZxiOOXIVqx03qNZ0qvYfd_v5OGYw/edit





Trainings and Workshops

Details of Training	Sponsors/Facilitators	Location	No. of participants
Effective Monitoring and Evaluation of Anti-Corruption Strategies.	In collaboration with African Development Bank and Commonwealth Africa Anti-Corruption Centre (CAACC), Botswana	Online	2
Public Corruption & Law Enforcement Techniques Course	The US Department of State's International Law Enforcement Academy (ILEA), Gaborone Botswana	Online	1
Institutional Capacity Building and Fiduciary Clinic	African Development Bank	Online	1
Emerging Anti-Corruption issues and Private Sector engagement for SADC Anti-Corruption Agencies.	SADC, BASEL INSTITUTE ON GOVERNANCE and German cooperation (GIZ)	Online	2
Anti-Bribery & Corruption (<i>Public Education and Corruption Prevention</i>)	In collaboration with Mal-kara Consulting in Australia & Commonwealth Africa Anti-Corruption Centre (CAACC)	Online	1
Stakeholder Engagement for Corruption Prevention	Commonwealth Africa Anti-Corruption Centre (CAACC)	Online	1
Transparency/ Accountability for good governance	Ministry of Employment in collaboration with The Guy Morel Institute	The Guy Morel Institute, Seychelles	1
Changing Tides: The Evolving Illicit Drug Trade in the Western Indian Ocean	GLOBAL INITIATIVE Against Transnational Organised Crime	Online-Webinar	1

Challenges

Even where online materials have been developed, participants are reluctant to use them. One of the reasons why online materials are not being accessed by the public is because of the high cost of internet. Another reason is because people are reluctant to adapt to new ways or method of doing things.

The Pre-session and Post session questionnaires have been devised as a tool to collect and collate relevant information to establish a baseline survey to inform the Commission about policies, procedures and other mechanism that institutions have in place to fight corruption.

QR codes have also been developed for online materials but more sensitisation needs to be done to encourage people to use them.

More staff are required to effectively implement the targeted Risk Assessment and cope with the high demand of Anti-Corruption awareness sessions.

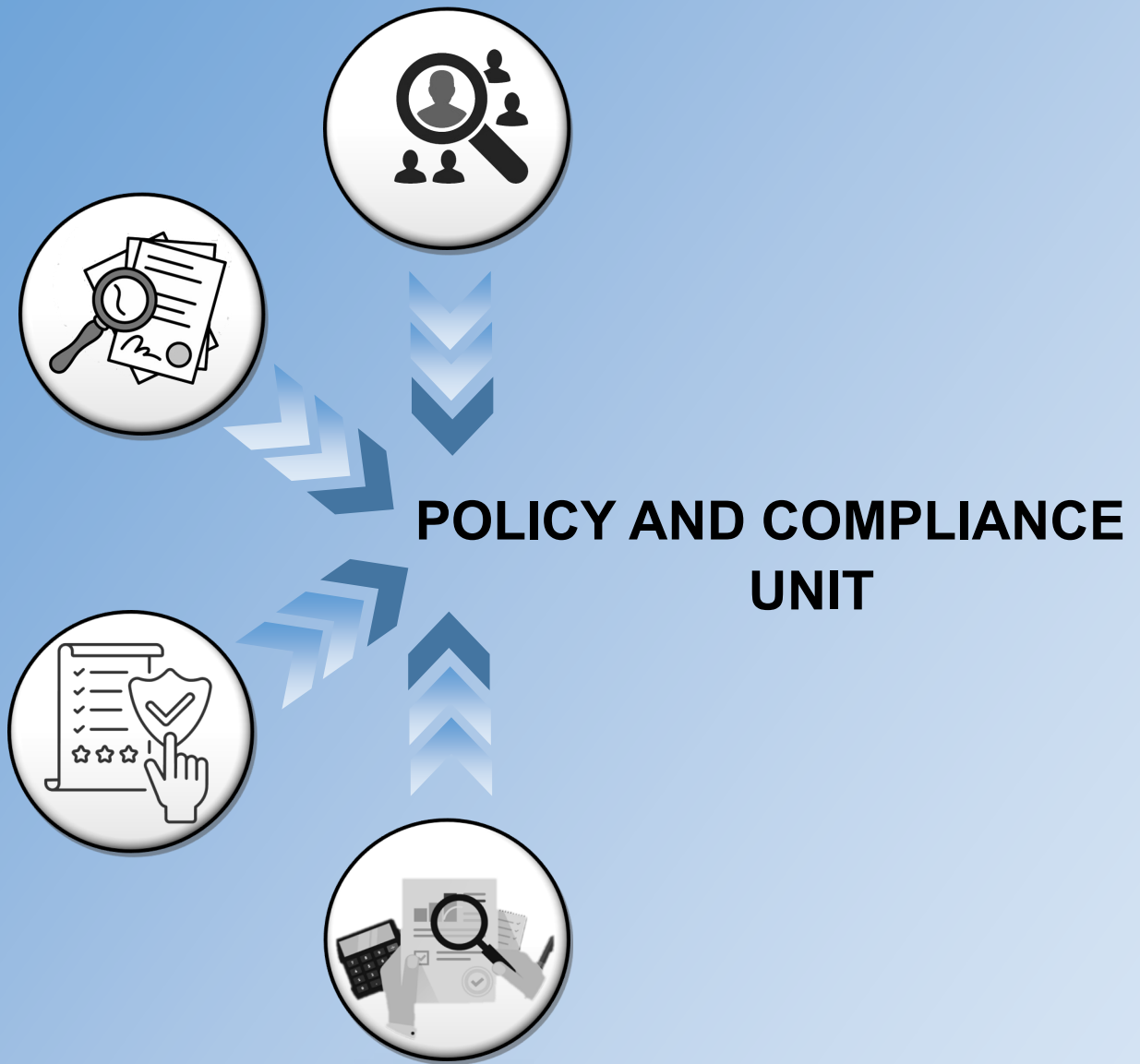
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Way Forward

Assist institutions in developing Anti-Corruption Policies and Procedures and will work in partnership to conduct corruption risk assessment.

Emphasis will also be placed on Private sector and sessions are being developed to be rolled out in 2022.



Overview

By authorisation of the Commission, the Policy and Compliance Unit (PCU) of ACCS was established in December 2019, and became operational by mid-January 2020. The decision to establish a new unit is in line with the continuous structural progression of the ACCS for effective operations adopting international standards and best practice. It is beginning to reap rewards.

The functions of the unit are as follows:

- **Contributing to the development and implementation of ACCS strategic plan;**
- **Engaging in related policy matters;**
- **Engaging with the Heads of Unit for coordination and implementation of policies and provide training (where applicable);**
- **Engaging in external relations matters including external reviews;**
- **Undertaking internal compliance reviews, monitoring and unit assessments;**
- **Identifying emerging risks and develop mitigation strategies;**
- **Representing the ACCS on NAC and TAC and undertaking related taskings.**

The PCU works closely with the Legal Advisor for support of the legal aspects of the operation, and for the compliance and monitoring aspects, the department works closely with all the other internal units of the ACCS.

For the institution's strategic progressions, the PCU works closely with both local and international counterparts, and also acts as the representative of the institution, as instructed by the Commissioner.

In April 2021, through amendments made to the Public Officers Ethics Act 2008, the POE Commission was dissolved and all functions were transferred to the ACCS. Additional mandates received by the ACCS were to administer the implementation of the General Code of Conduct and Ethics, and the Declaration of Income, Assets and Liabilities of Public Officers. The mandates from the POE Act were awarded to the PCU in July 2021, for effective management and implementation.



Highlights of 2021

During the course of the year 2021, the PCU managed to complete various tasks relating to its functions. These achievements were successful from working jointly with other ACCS units and also with other key stakeholders nationally.

Achievements in the functions are categorized as follows:

- **MoUs and other legal arrangements**
- **Public Officers' Declaration of Income, Assets and Liabilities**
- **AML/CFT**

MoUs and other legal arrangements

In 2021 the ACCS through the PCU, successfully established four MoUs with local stakeholders to aid in fighting corruption, money laundering and other economic crimes, through joint working and exchange of information. (*refer to Table. 1*)

Local Institutions

Institutions	Date signed
SRC	March 2021
RG	March 2021
CBS	March 2021
MoF	August 2021

Table. 1

The ACCS have also requested a local MoU with the Seychelles Police which is still work in progress.

Foreign Institutions

ACCS have established different legal arrangements that will benefit both the institution and the country towards fighting corruption and other related crimes effectively. (*refer to table 2*)

Types of arrangements for Corruption	Total and Particulars
Bilateral	1 – ICAC Mauritius
Multilateral	1 - IACCC
Co-operation based on reciprocity	1 - CAACC
Other co-operation mechanisms	2 – EU Aid & Asset Reality

Table. 2

The ACCS is still waiting for a proposed signatory date with the CACIAF Bulgaria to establish a bilateral MoU.



Public Officers' Declaration of Income, Assets and Liabilities

The PCU officially took charge of the POE functions in July 2021, and started collection of Declaration of Assets forms from the public officers in August 2021. The PCU manage to collect 2020 DoA forms from 17 public institutions/departments, from about 250 public officers, which also includes forms from preceding years that were classified as “*arrears*”. It is to be noted that from January 2021 until April 2021, the POE Commission collected submissions of 2020 DoA forms from only one public institution.

With some delays in operation mostly due to the pandemic and relocation of the ACCS office, the PCU could not collect submissions of all the 2020 DoA forms from all public sectors. Break-down of the sectors can be found in the table below.

Public Sector	Total
Defense	1
Energy	1
Finance	4
Health	2
ICT	1
LEAs	2
Media	1
Public Administration	1
Social Affairs	1
Others	4

Through this exercise, the PCU introduced two new approaches to effectively implement the DoA function.

The first approach is the appointment of official liaison persons from each institution. The liaison person will be responsible for providing institution updates as and when it occurs as per regulation 4 of the POE Regulations 2008. This will cut down on delays faced by the ACCS when undertaking vetting exercises on eligibility of public officers from respective institutions on an annual basis.

The second approach is the collection process of the DoA forms. The ACCS has introduced on-site collection of DoA forms from public institutions who have large volume of eligible staff. The ACCS took into consideration the challenges that both officers and institutions face when it comes to disruption in operation due to movement of staff, as well as, flexible working conditions during the pandemic period.

Both approaches were seen as positive changes by the public institutions that have already submitted DoAs. The collection of 2020 DoAs will continue during the year 2022 along with the 2021 DoAs jointly.

AML/CFT

Strategic Updates

The ACCS is an official member of the NAC and the TAC, whose mandates are mainly to guide, support, implement and oversee Seychelles National Strategic Plan 2020-2023, for Combating Money Laundering and Terrorist Financing in the jurisdiction in line with the FATF, ESAAMLG, OECD, IMF and WB recommendations.

During the year, the committee reviewed various local legislations and provided recommendations to the Seychelles government in line with international standards. Recommendations of the reviews includes repealing and insertion of new provisions in existing legislations, and creation of new laws.

All the laws reviewed are currently operational and being enforced by the different LEAs and respective authorities.

(refer to table below)

Name of Legislation	Particulars of reviews
AML&CFT Act 2020	Amendments
AML&CFT Regulations 2020	Amendments
BO Act 2020	Amendments
BO Regulations 2020	Amendments
AC Act 2016	Amendments
PTA 2008	Amendments
PTA Regulations 2021	Amendments
PPF Regulations 2021	New
MACMA 1995	Amendments
Extradition Act 1995	Amendments
Cybercrimes and Other Related Crimes Act 2021	New
Custody Management and Disposal of Seized, Forfeited or Confiscated Properties Act 2021	New

Both committees are currently working closely with the MoF and WB on the upcoming Seychelles NRA 2022. This will be the main highlights for Seychelles when undergoing its ESAAMLG mutual evaluation in 2024.



Challenges

Throughout the year the department has experience many achievements as shown in the previous chapters of the report, as well as many challenges. The common challenges faced by the department are as follows:

Manpower and Resources

Although there was a merger of functions with the former POE Commission, the PCU did not benefit in terms of staffing from this process. The former POE Commission had three staff aiding with the implementation of the declaration of income, assets and liabilities functions only. The PCD currently has only two staff undertaking the DoA functions, as well as, the Compliance function that covers both national and international level of strategic approach for ACCS.

Apart from manpower, constraint with transportation is also a major challenge. The PCU does not have an assigned transport for undertaking of its functions. There have been instances of cancellation in collection of DoA submissions due to unavailability of ACCS transport, mainly due to the level of priorities in the operations for other units.

General Awareness on DoA

In many instances, the PCU has received a lot of complaints regarding confusion when it comes to the general process of DoA from the public sector. The department is facing a lot of resistance from the sector and officers to declare their assets. This is mostly due to lack of awareness from the former commission. Many institutions have never made any interaction with the former commission from since the law came into force in 2009 until April 2021, regarding public officers' DoA.

A lot of officers appointed in the public sector over the years have no awareness on the POE Act 2008 and its regulations, or about the principles on how they become eligible for declaring their assets, and confusion on how these processes were being undertaking in the past years. The main confusion in the public sector is that this process only applies to officers on PSC contract. As per the law, there is no mention of any employment contract, but rather on positions held.

Trainings

The department have not had any exposure to any relevant trainings prior from undertaking the DoA functions in July 2021.

Legislations

The 2021 amendments of the POE Act 2008 did not properly address all legal issues in the law which mainly relates to the power of the ACCS in the POE Act. The ACCS is the legal custodian of the DoA forms, however, for any arising investigations relating to DoA, this mandate still lies with the AG and the Office of the Ombudsman. Procedures on how investigations should be undertaken or referred to regarding DoA in the Act is none existent.

Lack of internal policies for centralisation of data

A major on-going challenge still faced by the PCU is access to internal data. Lack of internal procedures for centralisation of data by the different units constantly causes delays for acquiring information on a timely manner. All information requested by the PCU are for reporting of ACCS institutional progression as an LEA to the international community that are then assessed for effectiveness. Data received by ACCS is consolidated with others local institutions, as a whole for Seychelles. Lack of data means lack of proof and progression. Failure to provide data always results in strong warnings and stringent recommendations from international community when being assessed for effectiveness in deterring, investigating and prosecuting serious crimes.



Way Forward

The Unit would like to recommend the following, that will aid in resolving some challenges faced to effectively deliver its function.

- Reviewing of all the laws that provides mandate to the ACCS needs to be undertaken and aligned accordingly. Powers of the ACCS should be properly defined and constituted in the POE Act and its regulations and aligned with other laws.
- Availability of trainings for the department relation to the current functions, including to exposure to modern implementation of DoA in the public sector by other jurisdictions.
- Modernisation of the DoA process in line with modern technology.
- Constant availability of resources such as transportation to the PCU for DoA collection, to have the ACCS achieving a goal of 95% to 100% of annual DoA collection.
- Formation of internal policies, and implementation of such policies for the effectiveness of the PCU.
- Continued support from the government and other international counterparts in relation to resources, such as grants and budget to assist ACCS achieve an effective operation.

Conclusion

The PCU would like to thank the ACCS staff for their continuous support and determination to push for effectiveness. The unit is also grateful for the support from the government and from the public sector for recognizing the ACCS as a reputable authority that prevents, investigates and prosecutes corruption and other related crimes.

The unit would like to thank the public sector for welcoming the new approaches positively with regards to public officers' declarations of assets, and welcomes any recommendations that the sector may have that will aid to implement the function effectively.

The PCU remains committed and motivated to have the ACCS meet all the necessary and required standards to be recognized as an effective and reputable law enforcement authority both nationally and globally.



CORPORATE SERVICES





Overview

Corporate Services consists of:

- Human Resource Management and Administration
- Finance
- Information Technology.

Each is headed by a manager who directly reports to the Commissioner except for the Finance section which does not have a manager but still reports to the Commissioner. Where applicable, each manager is responsible for the supervision and performance of each section contributing to the overall performance of the Corporate Services.

Corporate Services provides consistent strategic support to all ACCS Units in order to achieve their annual targets as outlined within the ACCS Strategic Plan.

CS deals with issues of management effectiveness, recruitment, gender equity and equal opportunity issues, work systems improvement and capacity building (continuous learning), effective financial administration and management support, and resource mobilization and allocations (Capital and Assets) to enable improved performance by other units.

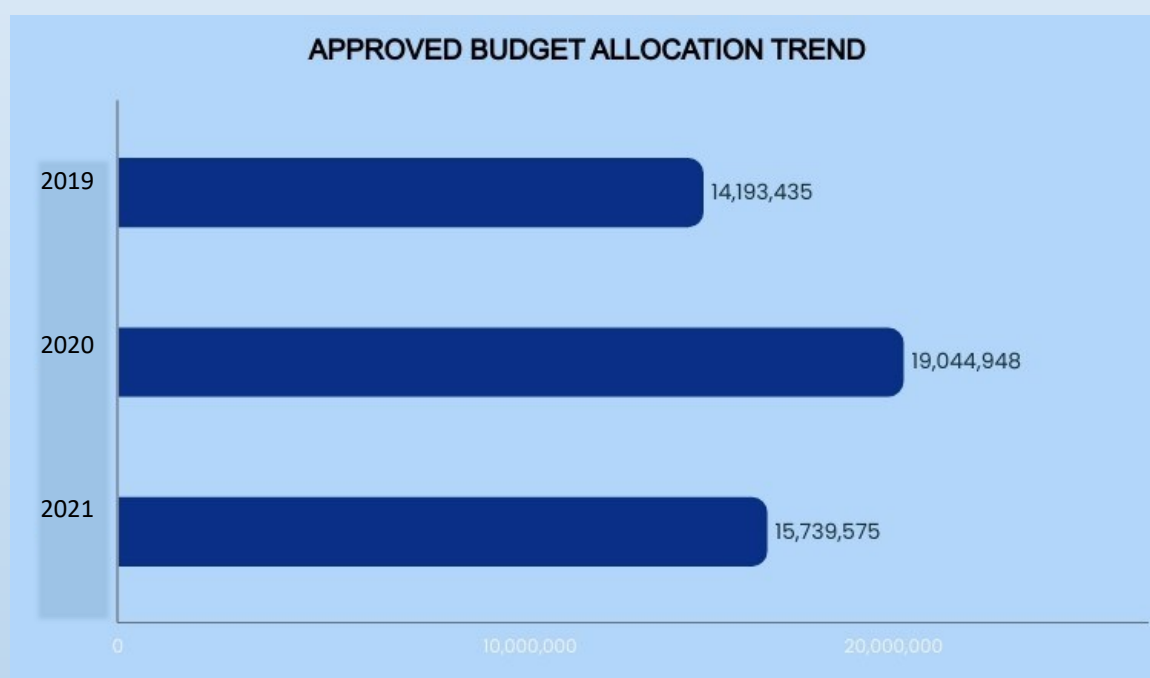
CS also liaise directly with other key stakeholders such as the Department of Finance, and other external service providers to ensure ACCS effectively delivers on its mandated role in fighting corruption.

FINANCE

A key element of any organisation is a strong finance department. At ACCS, the finance section ensures the timely and accurate delivery of payroll and reporting, accounts payable and compliance to any financial legislation.

Although being an independent entity, ACCS receives its funding from the Ministry of Finance, Economic Planning and Trade.

The annual budget of the is submitted for approval by the National Assembly annually and any other additional requests follow the same procedure.



The approved ACCS budget allocation for the year 2021 was

Wages & Salaries	10,456,010.40
Goods & Services	4,387,794.79
Minor Capital	895,770.00



Additional Funds

With the merging of the Public Officers' Ethics Commission the sum of SR 1,598,363.85 was transferred to the ACCS budget.

With a highly sensitive operation being undertaken a revised budget was found to be necessary and an additional amount of SCR 6,422,315.99 was therefore allocated to effectively carry out the operation.

The revised budget for 2021 therefore was **SR 23,760,255.03**

The total expenditure of 2021 amounted to **SR 23,464,685.84**

Payroll

During the year of 2021, six new members of staff were added to the payroll.



Human Resources and Administration

Overview

Our human resources team oversees numerous responsibilities, including the development of HR Procedures, Occupational Health & Safety, Training and Development, and addressing any workplace matters.

Capacity Building

In its continued effort to ensure an effective and robust institution the ACCS places a lot of emphasis on capacity building. The ACCS continued to strengthen cooperation with international anti-corruption organisations and supervisory institutions of different countries and regions as well as its local partners such as The Guy Morel Institute, FIU, ILEA, CAAC. Staff attended various national and international, regional and local trainings and conferences.

Refer to table 3



Trainings and Workshops

Course Name	No of Staff
Anti-Corruption Case studies	2
Effective Monitoring and Evaluation of Anti-Corruption Strategies	3
Enhancing security - Justice coordination to counter transnational organised crime	1
Bribery and Corruption Training	1
Regional Workshop on Role of Law Enforcement Authorities and Prosecution in Countering the Financing of Terrorism	1
Criminal Procedures L3	1
StAR Initiative – Asset Management (World Bank/UNODC)	2
Seychelles Asset Management workshop	1
Changing Tides: The Evolving Illicit Drug Trade in the Western Indian Ocean	1
CPF Training	1
Commonwealth Regional Conference for Anti-Corruption Agencies in Africa	4
Financial Investigation Course	2
Transparency and Accountability for Good Governance (TAGG).	1
International Cooperation & Mutual Legal Assistance	1
StAR Initiative – Financial Investigations Training (World Bank/UNODC)	1
Public Corruption and Law Enforcement Techniques (ILEA)	2
Institutional Capacity Building and Fiduciary Clinic (ICFC)	2
Executive Leadership Development.	3
Source & Application Analysis	1
Asset Tracing and Seizure Module 1	1
Emerging Anti-Corruption issues and Private Sector Engagement	2
FATF training/ World Bank	2
Workshop to Increase skills with international cooperation.	2
Legal Aspects of Combatting Corruption	1
Asset Tracing and Seizure Module 2	1

Table 3



Information Technology

Overview

The IT section is responsible for maintaining the Information Technology (IT) infrastructure of ACCS and developing strategies, policies and goals. The IT section ensures digital and technical support is provided to all units within ACCS over three sites. The ACCS has been classified as a Critical National Information Infrastructure where IT security must be maintained at the highest level.

The section also oversees the Commission's IT infrastructure, manages ongoing platform upgrades and is responsible for service desk support to all ACCS staff.

The IT Unit currently has three staff; an IT Manager, IT Officer and an IT Assistant.

Information and Cyber Security

As a Critical National Information Infrastructure, Information and Cyber Security is an important element for ACCS. In order to mitigate the current increasing global and internal cyber threats and risks, several security controls have been implemented. The main objective of Information and Cyber Security is to maintain Confidentiality, Integrity and Availability (CIA), of ACCS Critical National Information. Some of the less sensitive security controls are described below:

IDS/ IPS

Intrusion Detection System (IDS) and Intrusion Prevention System (IPS) work systematically with other security controls to safeguard the ACCS network. The Security Operations Centre (SOC) monitors the entire ACCS network both internally and externally, comparing the network traffic against a database for known cyber threats and risks. Below is a sample of ACCS IDS/IPS is live and requires constant monitoring to reduce the risks of a cyber attack to ACCS and Seychelles generally from malign actors.



File Server Auditing System

The file server monitoring provides daily reports and audits of any changes on the file server.

Cloud Security Systems

The Cloud Security Management System includes an all-around security bundle that includes patch management, vulnerability assessment, antivirus, firewall etc. It provides a list of daily monitoring features and reports that keeps ACCS IT infrastructure protected against any cyber attack of which have seen an increase as ACCS becomes more successful and high profile.

Cyber Threat Hunting/Analysis and Intelligence

Another feature of the IDS/IPS is the Cyberchef. Cyberchef is part of the Security Operation Centre (SOC) used to analyse and investigate computer network traffic and allow deeper analysis and results. The data can be extracted from its binary form to provide IP addresses, and malware injected via the network by using the forensic platform.

Digital Forensics

ACCS has purchased the Tableau TX1 forensic imager capable of imaging almost all known hard drives for digital forensics. The device is an all-in-one built-in touch screen that enables the operator to conduct forensic imaging of the hard drive with ease. The TX1 imaging works by replicating the original hard drive and generating the report's SHA1 and MD5 hash values. The SHA1 and MD5 hash values are considered an important element of digital forensics that can verify the replicated data is the exact copy of the original copy. They can be used to re-verify an image and generate the same SHA1 and MD5 hash values, confirming that the information is intact and original. Tableau Tx1 is also used by Seychelles Police and international law enforcement agencies applies international standards so our evidence can be used throughout the world in criminal proceedings.

The team also designed an SOP that works alongside the Tableau TX1 with process forms to ensure all forensic extraction is well documented and can be used in court.

ACCS is still without a permanent forensic laboratory and other forensic equipment such as Cellebrite that can be used for phone imaging and much of our work has to be outsourced internationally due to its sensitive nature.

IT hardware, Cameras, Access Control

For a continuous productive environment in ACCS, all IT hardware is maintained properly to ensure processing performance whenever needed. All our IT Hardware is constantly being upgraded to newer technologies available. Firmware and Software are continuously patched and upgraded to provide robust security and an up-to-date IT infrastructure.

To ensure a Secure Access Control on premisses, IT has implemented a biometric system that monitors staff movements in the office and prevents unauthorized access to sensitive areas.

Camera surveillance provides a dedicated IP Network Base Camera System with High Definition with capability of 24/7 surveillance and motion recording capabilities. The camera system can play back of recordings at a specific time and date in case of any incidents.

IT Policies

The section has three active policies (Internet Policy, Network & Server Policy and Work from Home Policy)

Internet Policy ensures ACCS staff use the internet responsibly, safely and legally

Network & Server Policy provides a guideline of the technological resources made available to staff and what is allowed and prohibited. The policy objective is to protect ACCS critical information to allow ACCS employees to use the network and server responsibly.

IT Work from Home Policy was designed during the Covid-19 pandemic to allow-ACCS staff to continue working from home safely while maintaining the Confidentiality, Integrity, and Availability (CIA) of ACCS critical information. The policy endorsed and adopted some of the main objectives of the NIST standards (NIST Guide to Enterprise Telework and Remote Access Security Special Publication 800-46).

To keep the policies relevant to new technology and changes at ACCS, the documents are reviewed regularly. Over the next six months we will look to combine all the policies into one booklet to make it more accessible to staff and, where appropriate, add new IT policies that are in line with international standards, such as the ISO 27001, NIST and others.

Cloud database

In order to maintain its status as a world leader in anti corruption innovations ACCS is considering adopting a cloud database system that has been adopted by various anti-corruption commissions around the world, such as Mauritius and Myanmar. The benefit of a cloud case management system is to remove the manual processes within ACCS case management and achieve a paperless office. The database also offers maximum IT redundancy, flexibility, instant reports and oversight.



ACCS IT achievements/Project 2021

Moving all ACCS IT infrastructure from previous to new location

An IT site survey was carried out by IT at ACCS Headquarters following our relocation involving a Mesh network Design that offers maximum IT redundancy and caters for the satellite offices infrastructure .

Configured and installed IDS/IPS cyber security SOC (Security Operation Centre)

A Security Operation Centre (SOC) security system was installed and is used to monitor incoming and outgoing traffic to the ACCS network. The platform also offers advanced features such as malware analysis and PCAP analysis and many more amongst others.

Configuring Azure information protection

Azure Information Protection (AIP) was implemented to provide security for ACCS sensitive and confidential information via email encryption for the labelling of documents to maintain Confidentiality, Integrity and Availability (CIA) of data.

Upgrading the on-premises Security (access control), alarms and Camera System

- Installed and configured a new alarm system in the ACCS HQ, for 24/7 security.
- Installed access control to all department offices.
- Installed intercom system.
- Installed and configured camera system, for 24/7 surveillance and recording.
- Installed temperature sensors in sensitive areas.

Extending ACCS network to other ACCS external Offices

An IPSec Encrypted tunnel was created between the main office and the satellite office to facilitate file sharing, scanning documents and connect to the ACCS central network.

Upgrading Windows server 2019 to 2022

During the reporting year all ACCS servers were upgraded to Windows 2022.

The new package offers more security features, such as firmware protection, hardware root-of-trust, UEFI secure boot, Virtualisation security, secure DNS, and many more security features that would be demanded of a cyber sensitive and critical infrastructure.

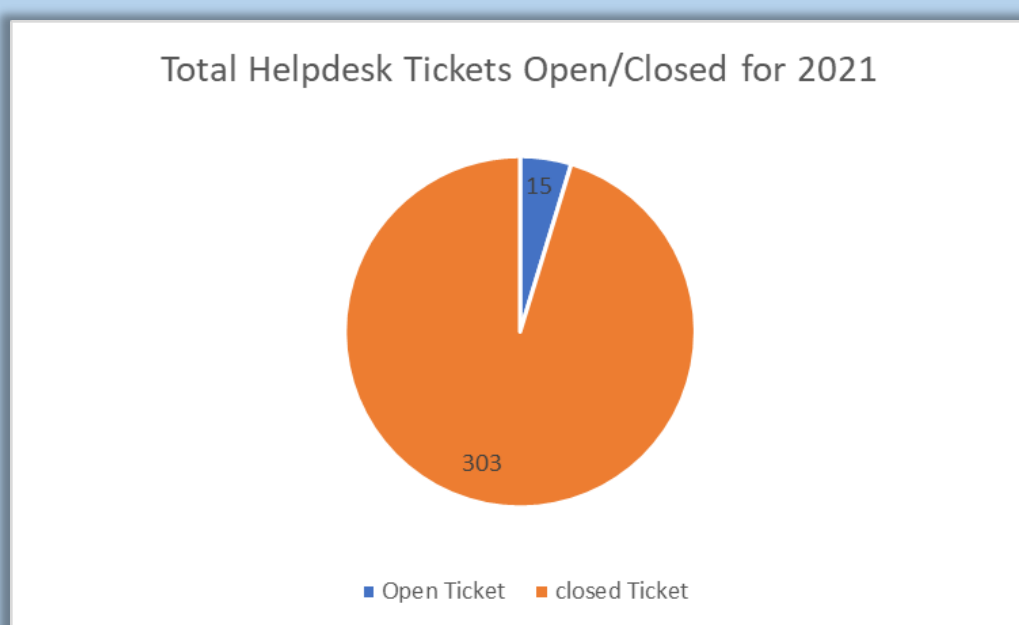
Capacity building

As the ACCS investigates and prosecutes more cases the need to maintain an effective IT infrastructure and high information and cyber security status is paramount. It requires ACCS to continue investing in IT and providing staff with the relevant training consistent with the technological innovations. There is a demand to increase the IT staffing resource given ACCS has grown exponentially.

Statistics

The helpdesk system is cloud base, and it is used to register all the IT related issues, staff IT support requests, IT projects, cyber security and information security threats and many more. The platform also provides transparency for the IT department with monthly statistics reports submitted to the Commissioner. Staff can also register their own ticket (issue) on the platform, whether they are working remotely or on-premises. The cloud platform is available 24/7, and IT is notified via email as soon a ticket is created on the platform.

During 2021 318 tickets were raised with 303 of those being resolved in a timely fashion in line with Key Performance Indicators. Only 15 of the tickets fell outside of the resolution timeframe.





Challenges

ACCS is growing rapidly and now has two sub-offices and more employees. This change has impacted the IT department despite recently recruiting a third officer, which is still insufficient to cater to IT demands. The IT department has evolved from providing essential IT hardware support to information and cyber Security, cyber intelligence, and digital forensics. The global digital world has also changed with a rapid surge from online cyber threats such as ransomware and phishing attacks that have impacted Seychelles. Throughout the reporting year the IT department had to change its strategy and adapt to the fast-paced digital era to ensure that ACCS continued to meet both its IT and wider objectives. Part of that was the need to level up information and cybersecurity to protect ACCS Critical National Information Infrastructure. If budgets allow we hope to continue to increase support and capacity building to the IT department and effectively mitigate cyber threats and risks.

National Cyber Security

This year we have noted the increase in cyber security attacks on our IT infrastructure. There is a constant need to enhance and maintain our cyber security and we stand willing to work with the Government of Seychelles, public sector and private institutions to establish a national cyber security strategy and response mechanism.

Conclusion

ACCS IT has made considerable progress in improving ACCS IT infrastructure, information, and cyber security from no IT infrastructure in 2017 to building a complex international standard IT infrastructure. However, cyber threats and risks remain a growing concern. In 2022 ACCS will have to continue maintaining its information and cyber security status at the highest level to mitigate such threats and ensure Confidentiality, Integrity and Availability of ACCS Critical National Information Infrastructure is protected.



INTERNATIONAL COOPERATION



Southern African Development Community (SADC)

Protocol

On 4th May and 14th October, 2021, the International Affairs Committee met with the ACCS to discuss and officially review the SADC Protocol Against Corruption which has been submitted for ratification to the Assembly under Article 64 (4) of the Constitution.

Meetings

- Virtual meeting on the development of the Regional Integrated Strategy to Prevent and Combat Transnational Organised Crime in the SADC Region. 1-2 February 2021
- Virtual meetings for the SADC ANTI-CORRUPTION SUB COMMITTEE (SACC) - 17 MAY 2021
- Virtual validation of Draft Report FEASIBILITY STUDY ON THE ESTABLISHMENT OF A REGIONAL ANTI-CORRUPTION INFORMATION SHARING CENTRE. - 11th November 2021
- REVIEW OF THE SADC STRATEGIC ANTI-CORRUPTION ACTION PLAN (2018-2022) – 12 October 2021
- IMPACT OF COVID 19 ON THE ANTI-CORRUPTION SECTOR (LESSONS LEARNED AND BEST PRACTICES) - 13 October 2021

Capacity Building

Training on *Emerging Anti-Corruption issues and Private Sector engagement for SADC Anti-Corruption Agencies* - Date: 22-24 September 2021

ACCS has always considered international cooperation and coordination to be a crucial part of Seychelles anti-corruption development strategy to fight corruption and misuse of office, financial crime and money laundering and further prevent such practices. National and international cooperation is embedded in section 5(1) (j) and (k) of the Anti-Corruption Act 2016 which provides the legal basis for the ACCS to develop coordination and cooperation with other institutions authorised to investigate, prosecute, prevent and combat corrupt practises so as to implement an integrated approach to the eradication of corruption and to consult, cooperate and exchange information with appropriate bodies of other countries that are authorised to conduct inquiries or investigations in relation to corrupt practises.

As an Associate Member of International Anti-Corruption Coordination Centre (IACCC) since October 2020 we have the ability to facilitate the exchange of intelligence amongst others member countries as well as international best practice. IACCC brings together specialist law enforcement officers from multiple agencies from around the world to tackle allegations of grand corruption. Valuable technical, operational and mentoring assistance has been provided to the ACCS by IACCC throughout the reporting year in order to progress our investigations and increase our continuous professional development.

The ACCS have attended many IACCC workshops both in person and online including a collaborative event with the Independent Commission Against Corruption of Mauritius in October 2021 regarding building capacity on combating corruption and asset recovery. The Financial Intelligence Unit of Seychelles is also in the process of becoming an Associate Member of IACCC and collaboratively it is hoped Seychelles will become a regional centre of excellence.

Full members are:

Australian Federal Police, New Zealand's Serious Fraud Office and Police, Royal Canadian Mounted Police, Corrupt Practices Investigation Bureau of the Republic of Singapore, UK's National Crime Agency, USA's Federal Bureau of Investigation, US Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE) and Homeland Security Investigations (HSI).

Other IACCC Associate Members are:

The Cayman Islands Anti-Corruption Commission, The Gibraltar Financial Intelligence Unit, The Guernsey Financial Intelligence Unit, The Isle of Man Financial Intelligence Unit, The Jersey Financial Intelligence Unit, The Mauritius Independent Commission Against Corruption, The Turks and Caicos Islands Integrity Commission



MONITORING AND EVALUATION



Transparency International Corruption Perception

The Corruption Perceptions Index (CPI) is annually published by Transparency International. The CPI scores and ranks countries/territories based on how corrupt a country's public sector is perceived to be by experts and business executives. Countries are ranked on a scale from 100 (very clean) to 0 (highly corrupt). Countries are rank on a scale from 100 (very clean) to 0 (highly corrupt).

Seychelles is the 27th least corrupt country in the world as well as the highest-ranked African country with an overall score of 66.

Seychelles was assessed using 4 data sources:

- Economist Intelligence Unit (EIU),
- Global Insight Country Risk,
- Varieties of Democracy (V-Dem)
- World Economic Forum

The statistics below show Seychelles performance for the CPI for 2020 which were published in the reporting year in January 2021.

Data Source	Rank	Score
Economist Intelligence Unit (EIU)	2 nd	72
Global Insight Country Risk	2 nd	71
Varieties of Democracy (V-Dem)	15 th	64
World Economic Forum	23 rd	57
Overall (mean)	27 th	66

Below is Seychelles progress since 2017:

Year	Rank		Score	Score Change
	Sub-Saharan Africa	Worldwide		
2015	3	40	55	
2017	2	36	60	+5
2018	1	28	66	+6
2019	1	27	66	0
2020	1	27	66	0

Seychelles has made significant progress on the CPI score for the past five years and improving its rank from 27th in 2020 to 23rd in 2021.

Anti-Corruption Commission Seychelles

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