



ANNUAL REPORT

ACCS

ANTI-CORRUPTION COMMISSION SEYCHELLES

2022

ANNUAL REPORT 2022

ANTI-CORRUPTION COMMISSION SEYCHELLES

SUBMISSION OF THE ANNUAL REPORT

This Annual Report for the year ending December 2022, 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



TABLE OF CONTENTS

Commission Characteristics	5
Mission Statement	6
The Commission Structure	7
Advisory Council	8
Commissioner	8
Commissioner's Message	9
Highlights of 2022	10
Complaints Unit	11
Investigations Unit	17
Prevention Unit	24
Policy and Compliance Unit	30
Corporate Services	36
Finance	37
Human Resource and Administration	39
Information Technology	46
International Cooperation	52
Monitoring and Evaluation	55



LIST OF ACRONYMS

ACCS	Anti-Corruption Commission Seychelles
AML	Anti-Money Laundering
ASP	Agency for Social Protection
CAACC	Commonwealth Africa Anti-Corruption Centre
CFT	Countering Financing of Terrorism
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
IAD	Internal Audit Department
ILEA	International Law Enforcement Agency
LEA	Law Enforcement Agency
MACMA	Mutual Assistance in Criminal Matters Act
MoE	Ministry of Education
MLH	Ministry of Lands and Housing
NAC	National AML/CFT Committee
NCA	National Crimes Agency (UK)
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



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.

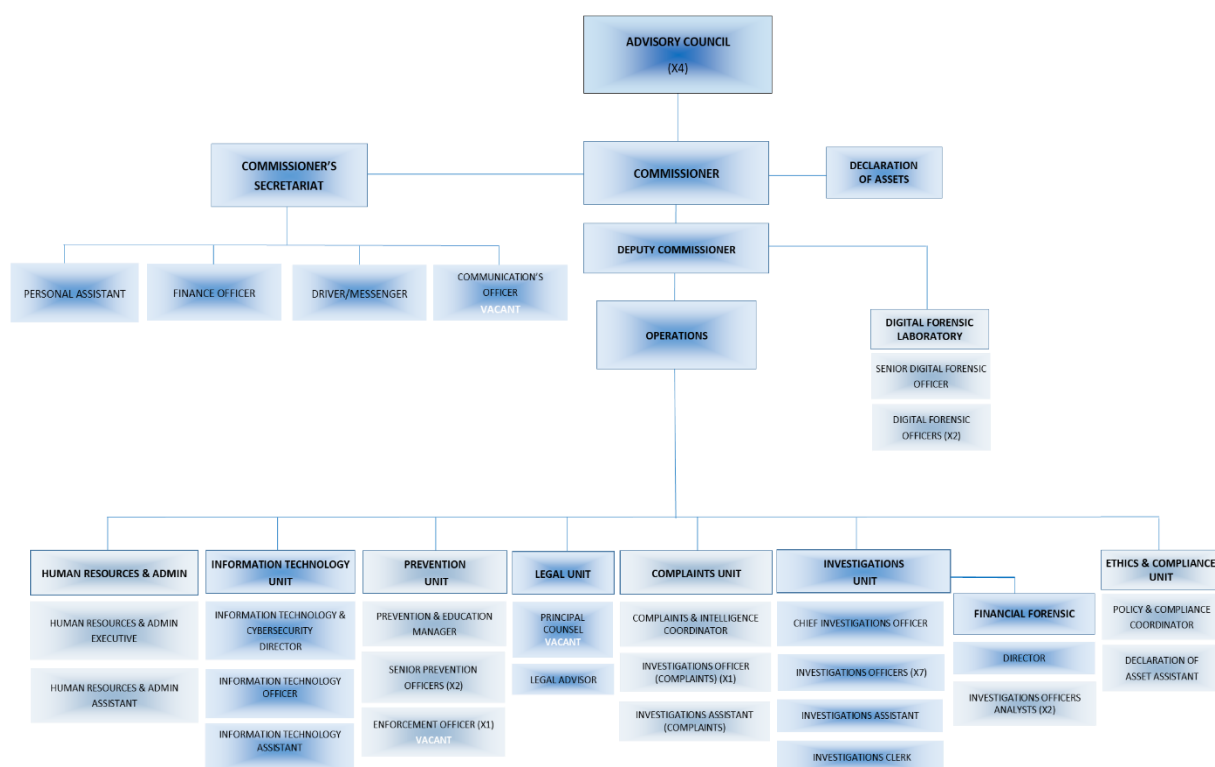




Commission Structure

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





ACCS ADVISORY COUNCIL

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).

Composition of the Advisory Council:

- Bernard Pool - Chairman
- Angelique Antat
- Karine Dick
- Dyane Azemia

Karine Dick replaced Damien Thesee, who resigned in June 2022.

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.

COMMISSIONER

In accordance with Section 6 of the Anti-Corruption Act the Commissioner is appointed by the resident 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).



Commissioner's Message



2022 was a year mixed with successes and challenges in the areas of Declaration of Assets, Investigations, and Prosecution. ACCS, as a fledgling organisation, continued to build its capacity through staff development, mixed and modular training methods, mentoring and on-the-job training. With a fully committed budget, stretched human resources, management of the digital section of a case management system, and reliance on third parties, ACCS continues to focus on its mandate of declaration of assets management, prevention, detection, investigation, and prosecution.

ACCS was loaned a Digital Forensics Lab by the UK's National Crime Agency to enable us to manage an extensive cache of electronic devices seized during searches relating to our cases. This meant a secondment of three staff members from the Investigations Unit to oversee the work of the lab. The continuous on-the-job training for staff, while simultaneously investigating and prosecuting cases, has been the organisation's greatest challenge. To support and enhance the work of ACCS, a team of foreign consultants both in the legal and investigations fields assisted the organisation throughout 2022.

Project Black Iron is a trail blazing corruption case which has brought ACCS's limited capacity both in human resources and technology to the fore. To buttress our efforts to deliver on our mandate, our international partners have provided us with expertise, specialist staff and other resources.

Meanwhile, as we plan for the future and mitigate our capacity building needs, it is clear that the Public Service Bureau, ANHRD and UNISEY will need to produce a comprehensive strategic plan to ensure that law enforcement agencies (amongst other government institutions) have quality specialist staff educated in law enforcement and specifically trained in the area of financial crime investigation.

ACCS has led in a multi-agency approach in setting up an evidential review team, a first of its kind, which included our local partners from Central Bank of Seychelles, Ministry of Finance through Internal Audit Division, Seychelles Revenue Commission, Financial Services Authority, Financial Investigations Unit and the Seychelles Police. I would like to publicly recognise the incredible support they have provided and personally thank them for the undoubted impact. This was achieved through 'on-the-job training' by experts from UK National Crime Agency (NCA) and our Resident Adviser Kevin Stephenson.

We also take this opportunity to thank the British Government and UK, Australian Federal Police, US FBI, IACCC and EU for their invaluable support. We look forward to their continued assistance to fight corruption in all their forms.

Ms. May De Silva

Commissioner



Highlights of 2022

STRATEGIC HIGHLIGHTS

- A number of legislative amendments increased the remit of the ACCS to prosecute corruption, money laundering and cases involving serious related criminality.
- Having been loaned a state-of-the-art Digital Forensics Laboratory by the National Crime Agency UK, ACCS has developed a local cadre of experts to maintain the facility and arranged for other law enforcement and criminal justice agencies to utilise the system in order to gather intelligence and evidence in all types of serious criminality, including corruption and money laundering.
- Backed by our growing law enforcement capability, prosecutorial expertise, memberships of international networks and local stakeholder engagement intelligence and evidence gathered from overseas is far more for attainable than ever before.
- Four cases have been sent to the Attorney General's Office to commence corruption prosecutions.

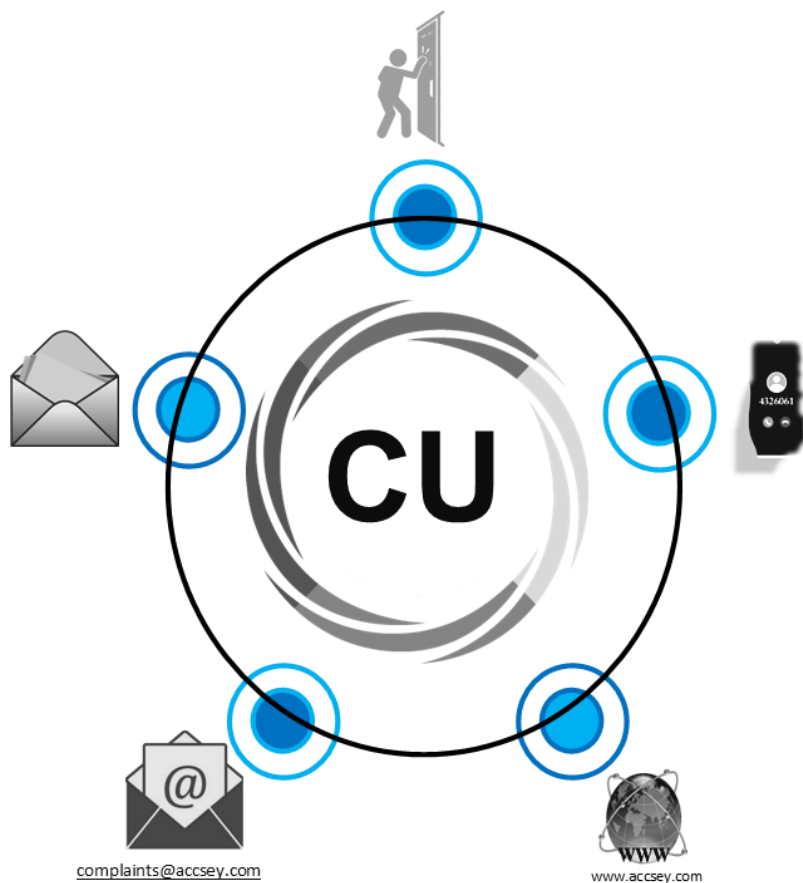
FINANCIAL HIGHLIGHTS

- The ACCS continued to provide value for money on a comparatively tight budget to other regional anti-corruption units.
- Utilising previously unused legislation a strong focus on asset recovery has been developed to coincide with the setting up of an Asset Management Unit to rightly return stolen assets to the people of Seychelles where ever on the planet they are hidden.

LOOKING AHEAD

- Building on our national and international partnerships we can maintain our standing as the 23rd least corrupt country in the world according to Transparency International's Global Corruption Perception Index and develop strong domestic partnerships through Memoranda of Understanding, joint training and crucial exchange of information.
- Seychelles will be hosting the 13th Regional Conference of Heads of Anti-Corruption Agencies in Commonwealth Africa in May and that the ACCS will move from being the Vice-Chair to Chair of the Association of Anti-Corruption Agencies in Commonwealth Africa for a year thereafter.
- The declaration of assets held by public officers can be registered online going forward and efforts will be made to make public officials more accountable, the asset register more transparent and unexplained wealth provisions more effective. This will be operational following funding for the relevant licenses and legislative amendments.

COMPLAINTS UNIT





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.

Staffing & Structure

The Complaints' Unit is under the direct authority and control of the Commissioner of ACCS.

There are currently 6 working in the Complaints Unit.

The Complaints' Unit consists of three staff, an investigating Officer and an Investigations Assistant and the Complaints and Intelligence Coordinator who oversees the unit.



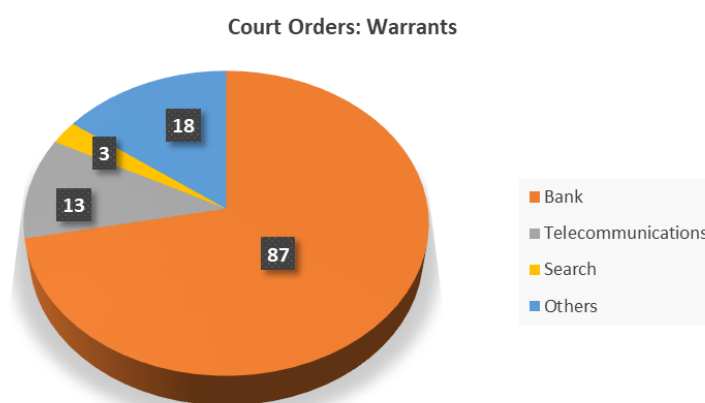
Highlights of 2022

It has been a very challenging year for the CU due to the impact of 'Black Iron Project', to which we have contributed staff resources. The absence of key staff at the early stage has affected the investigations, and whilst cases have progressed internally, and two cases were closed, it is with regret we report no cases have been transferred to the Investigations Unit. The engagement of the Unit in case preparation and initial case analysis has been focused and increased in quality.

Overall, we are pleased with our interactions with stakeholders who have been helpful despite their own resource implications, and we have made 100 requests to those agencies.

Preliminary Analysis

The Complaint's Unit has managed to conduct significant analysis in a few cases. In terms of activities this has resulted in more than one hundred warrants applied for (Banks, Seychelles Pension Fund and Telecommunications) more being bank warrants.

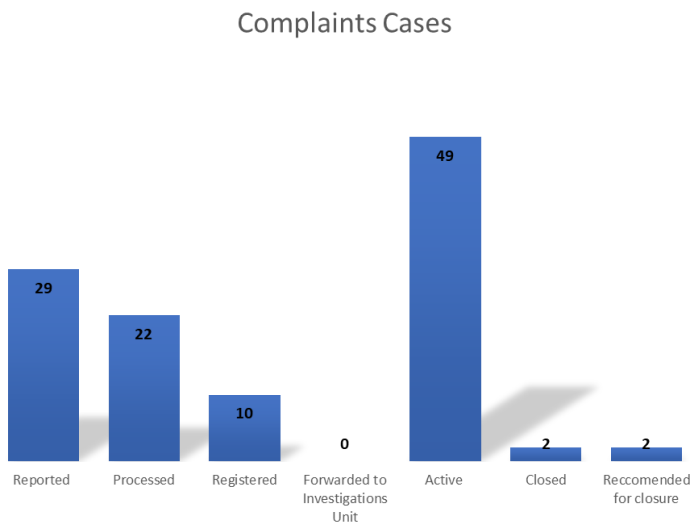


Seventy seven requests have been made to agencies and more than thirty three requests made to the FIU.

Requests Made	
Registrar General	19
SLA	16
SRC	09
ASP	08
Immigration & Civil Status	10
Seychelles Pension Fund	02
Ministry of Finance	01
Ministry of Land & Housing	01
Creative Industries & National Event Agency	01
FIU	33
Total	100

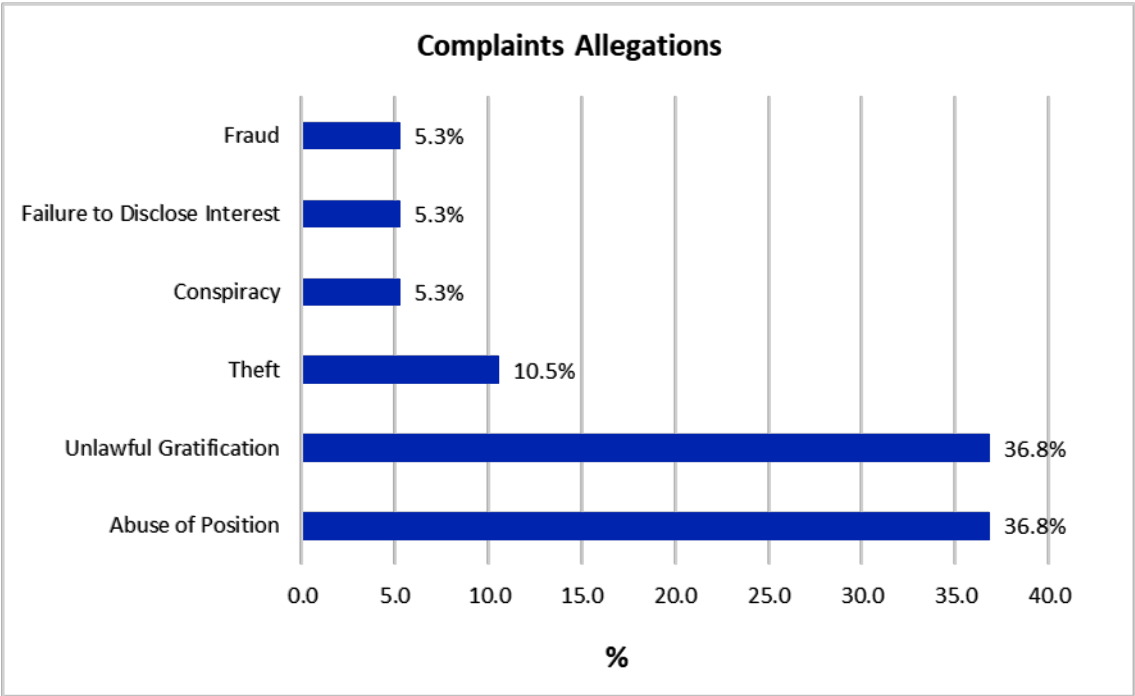


Statistical Overview



Categorisation of Complaint Allegations

The unit registered 10 complaints falling within its mandate. Out of those 10 complaints, 19 allegations were identified. The figure below gives an overview of the allegations made.





Case Submission

The Complaints Unit submitted three cases for the year 2022, two registered cases and one unregistered case. Submissions have been made and decisions are imminent.

Investigative Assistance

The Complaints Unit has provided investigative assistance to the 'Black Iron Project' and staff have been upskilled through training and mentoring as a result. The Unit has also provided some investigation support to the Investigations Unit.

Case Management System (CMS)

Building on the implementation of the basic CMS system in 2021 we have further developed our internal capability whilst we wait the introduction of the formal CMS. As a result, the CU has managed to keep cases updated and information live.

Joint Investigation with Internal Audit Division

We have developed a very close working relationship with the Internal Audit Team within the Ministry of Finance. With the collaboration and teamwork in place, we are better able to progress information sharing and evidence gathering and we expected to further develop this partnership in the future. The support of IAD is worth special commendation and thanks.

Training

Staff from the Unit have undergone both internal and external training this year. Two staff members attended a 3-day report writing skills training at the Guy Morel Institute, and a 1-day awareness training session on identification and handling of suspicious cash. The Complaints Coordinator successfully completed a five-day workshop on financial investigation. A two-week in-house training was conducted on Suspect Interview and Witness Statements which has benefitted four staff members. The Unit also attended about a half day Educational Tax Session with SRC. In addition to that, one staff member from the Investigations Unit is currently on attachment with the Complaints Unit covering basic subjects touching on investigation of corruption.

Team Collaboration

As previously stated in the 2021 report this is a very strong area of the Complaints Unit. Though a small unit, there is coordinated team effort. In addition, and as expected, our staff display a high standard of ethical principles and behaviors with an overall willingness to learn.

Team Collaboration

As previously stated in the 2021 report this is a very strong area of the Complaints Unit. Though a small Unit, there is coordinated team effort. In addition, the staffs displayed a high standard of ethical principles and behaviors and the overall willingness to learn.



Challenges

Despite our achievements, we have faced tough challenges this year, especially the human resources aspect, which is significant to the overall success of the CU as well as the ACCS as a whole. With the absence of one team member for most of the year, a third of the unit contingent, as well as others' leave periods it has significantly impacted our performance delivery.

The reoccurring theme of staffing clearly requires either further funding or a strategic review of handling complex cases. There are currently 51 cases outstanding with the Complaints Unit, many of which are complex in nature, which cannot be handled by any one individual due to various levels of experience. Further mentoring and training is required at all levels as part of the ongoing continuous professional development.

Additionally, the whole team has to engage in searches when there is a need and multi-tasking though a possibility can be quite difficult. The team has only one vehicle and one driver. Also note that staff have to proceed on leave and at times one can have sick-leave as well. With only two staff this can create a setback on productivity.

Whilst efforts were expected to be made to reduce the case backlog this has not been possible and with the advent of further complaint cases.

As mentioned in previous reports, our intelligence gathering capability is lacking in many aspects which hampers efficient development of corruption cases. This has not been a priority within the ACCS and the recommendation is for ACCS to vet, recruit and train a team of four intelligence officers to develop a strong national, regional and international capability resulting in greater turnover of complaints, improved investigations and stronger evidential cases in Seychelles.

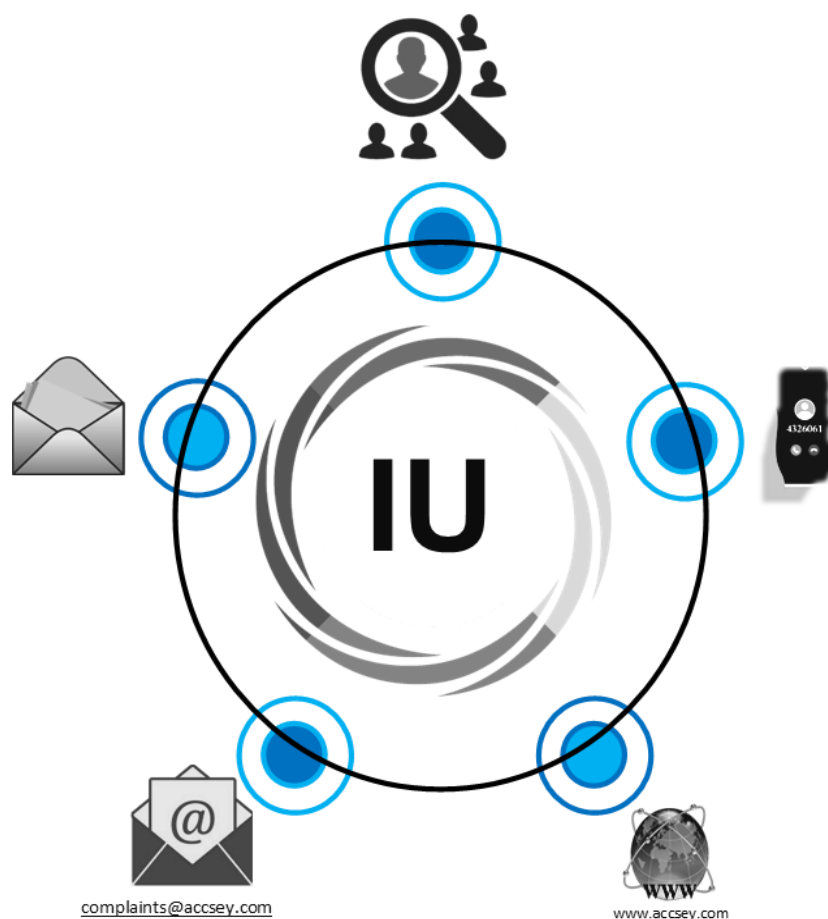
Forecast for 2023

It is difficult to perform a forecast as the issue of staff movements is fluid and resources are precious. As the Complaints Unit stands now it can only hope to achieve the following:

- i. submit at least three cases to the Investigations Unit.
- ii. close at least three cases for the year 2023.
- iii. conduct two in-House training; one related to evidence and the other one related to offences under the Anti-Corruption Act.
- iv. continue with its handling of complaint procedures which is the normal practice of the Unit



INVESTIGATIONS UNIT





INVESTIGATIONS UNIT

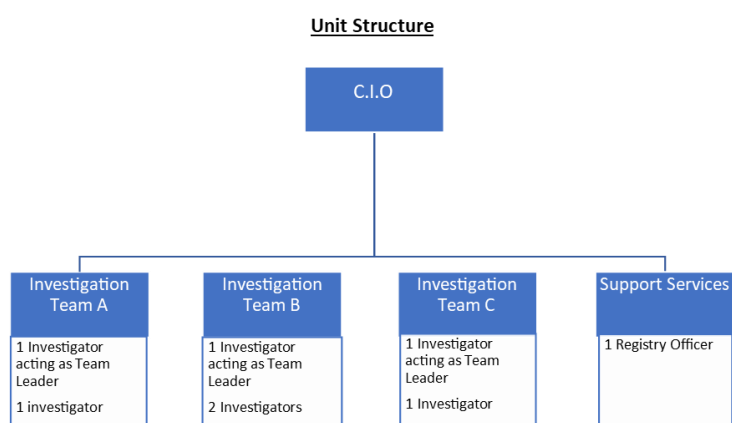
Overview

Function of the Investigation Unit

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 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

The Investigation Unit began the year with 13 thirteen staff, made of up a Chief Investigations Officer, 10 Investigators, one Investigations Assistant and one Investigations Clerk. Three investigators were permanently transferred to the new Digital Forensics Unit to support the Black Iron Operation and two to the Evidence Review Unit for four days per week. Hence, this now leaves the IU with only seven investigators and one investigations assistant.





Analysis of case statistics

Work input for the year 2022 has been significant for the IU. The year started with priority being given to the Black iron Operation which, and thereon most of the staffs being on placement at the Digital Forensic Unit and Evidence Review Team. Moreover, three staff proceeded on maternity leave of which added to the shortage of investigators and induced added pressure to the Unit. However, the Unit managed to submit four cases for prosecution and completed 15 backlog cases for closure.

Total of remaining cases as of December 2022 is 25.

Brought Forward	Received in 2022	Total	Closed	Attorney General Office	Ongoing
43	0	44	15	4	25

Service Delivery Environment

Key establishments

- Financial Intelligence Unit
- Seychelles Licensing Authority
- Registration Division
- Seychelles Revenue Commission
- Department of Immigration
- Banks
- Department of Public Administration
- Ministry of Finance



Requests sent to and responses received

Recipient	Request	Response
FIU	2	1
Registration Division	1	
SLA	1	1
Registrar of the Supreme Court	5	4
Superintendent of Prison	4	3
Public Service Bureau	3	2
Seychelles Police	1	
School of Performing Arts (NACC)	2	2
Immigration & Civil Status	9	9
ASP	4	3
MLH	1	1
MoFTI	6	4
Attorney General Office	1	
Seychelles Revenue Commission	2	2
Secretary of State, Cabinet Affairs	3	3
Truth, Reconciliation & National Unity	1	1
Ministry of Health	1	1
Human Right Commission	1	1
Total	48	38

Warrants Executed

Establishment	Bank Warrant	Search Warrant
Nouvobanq	1	
Seychelles Credit Union	1	
Mauritius Commercial Bank	1	
ABSA	1	
Ayon Ltd T/AS Gran Kaz		1
Amusement Centre		1
European Hotels & Resort Limited (Kempinski Seychelles Resort)		1
Le Relax Hotels Seychelles		1
National Conservatoire of Performing Arts (NCPA)		1
Sahajanand Builders Pty Ltd		1
Seychelles Pension Fund		1
Total	4	7

In-house Training and Support

As part of our continuous professional development staff are encouraged to work with mentors and trainers to develop their skills and we utilized the opportunity in this regard of an EU Consultant in:

- Providing Legal Opinion and reviewing of cases
- Providing legal opinion and advice on corruption investigations in general and reviewing cases

And a UK Barrister in developing a Code for ACCS Prosecutors to apply an evidential and public interest standard to the cases we submit to the Attorney General's Office



CAPACITY BUILDING/PROFESSIONAL DEVELOPMENT

COURSE NAME	NUMBER OF STAFF ATTENDED	DATE	LOCATION	FACILITATOR
Corruption in Public Procurement	1	31 Jan 22 – 4 Feb 22	Online	Commonwealth Africa, Anti-Corruption Centre (CAACC)
Open-Source Intelligence	5	9 Feb 22	E-Learning Course	Bassel Institute on Governance
Terrorists Financing	1	11 Feb 22	E-Learning Course	Bassel Institute on Governance
Financial Analysis using Excel	2	10 Feb 22 – 14 Feb 22	E-Learning Course	Bassel Institute on Governance
Visualize Cases and Flows of Money	1	15 Feb 22	E-Learning Course	Bassel Institute on Governance
International Cooperation and Mutual Legal Assistance in Criminal Matters	1	15 Feb 22	E-Learning Course	Bassel Institute on Governance
Operational Analysis of Suspicious Transactions Reports	1	18 Feb 22	E-Learning Course	Bassel Institute on Governance
Source and Application of Funds Analysis	1	21 Feb 22	E-Learning Course	Bassel Institute on Governance
Identifying and Avoiding Corruption in the Infrastructure Sector	1	2 Mar 22	Online	Global Infrastructure Anti-Corruption Centre
Crypto AML - CAACC	3	10 May 22 – 12 May 22	Online	Commonwealth Africa, Anti-Corruption Centre (CAACC)
Investigating Corruption in Multilateral Development Agencies Financed Projects	2	26 Jul 22 – 27 Jul 22	Online	Commonwealth Africa, Anti-Corruption Centre (CAACC)
Introduction to Financial Investigations	2	1 Aug 22 – 5 Aug 22	FIU	UNODC
Identification and handling of suspicious cash	7	8 Aug 22 – 26 Aug 22	FIU	UNODC
Anti-Corruption and Asset Recovery	2	22 Aug 22 – 26 Aug 22	ILEA	Gaborone, Botswana
Report Writing	2	29 Aug 22 – 31 Aug 22	TGIM	TGIM
Report Writing Skills	1	16 Sep 22 – 18 Sep 22	TGIM	TGIM
Educational Tax	8	21 Sep 22 – 22 Sep 22	TGIM	TGIM
Asset Recovery	1	24 Oct 22 – 28 Oct 22	Online	Commonwealth Africa, Anti-Corruption Centre (CAACC)
Financial Investigation & Asset Recovery	1	28 Nov 22 – 2 Dec 22	Kigali, Rwanda	Common Market for Eastern & Southern Africa (COMESA)
Cyber Security Awareness	6	30 Nov 22	ACCS	ACCS IT Team



Achievements

- Four cases have been submitted to the Attorney General's Office for prosecution.
- 15 backlog cases completed and closed.
- IU staffs have received more training in various areas
- IU has a good working relationship with the Attorney General Office.
- In general work output has increased.

Challenges

- Staff shortage
- Shortage of vehicle
- Lack of Principal Counsel to prosecute ACCS cases
- Limited space to conduct case meetings

Strategic Objectives for 2023

- **To have a fully functional IU with more Investigators/Intelligence Officers and adequate resources.**
- **Complete and submit nine cases intended for prosecution by end of 2023.**
- **Complete all backlogs cases for by end of 2023.**

Requirements

1. Recruitment

IU is in urgent need of recruitment for the following posts:

- Two investigators
- In house Principal Counsel (when investigating corruption offences or conducting any financial investigation, it is necessary to seek legal advice during the investigation and to ensure that cases are being conducted in compliance with legal provisions)
- Exhibits Officer (to maintain and keep proper records of exhibits)
- Two Intelligence Officers.

2. Training

Given the complexity and continuous challenges in corruption investigations, it is recommended that all recruits should be trained and sent for work attachments in other jurisdictions with well-developed corruption investigation capabilities. More training on Money Laundering investigations and Asset Forfeiture and Procurement is a necessity given the evolving nature of ACCS cases being investigated.



3. Facilities and Office Space

- Adequate interview rooms to allow investigators to conduct interviews at any given time are required
- More office space required to accommodate the continuous increase in number of staff.

4. Transport

- Adequate vehicles to facilitate the work of investigators to conduct more investigations in a timely manner.

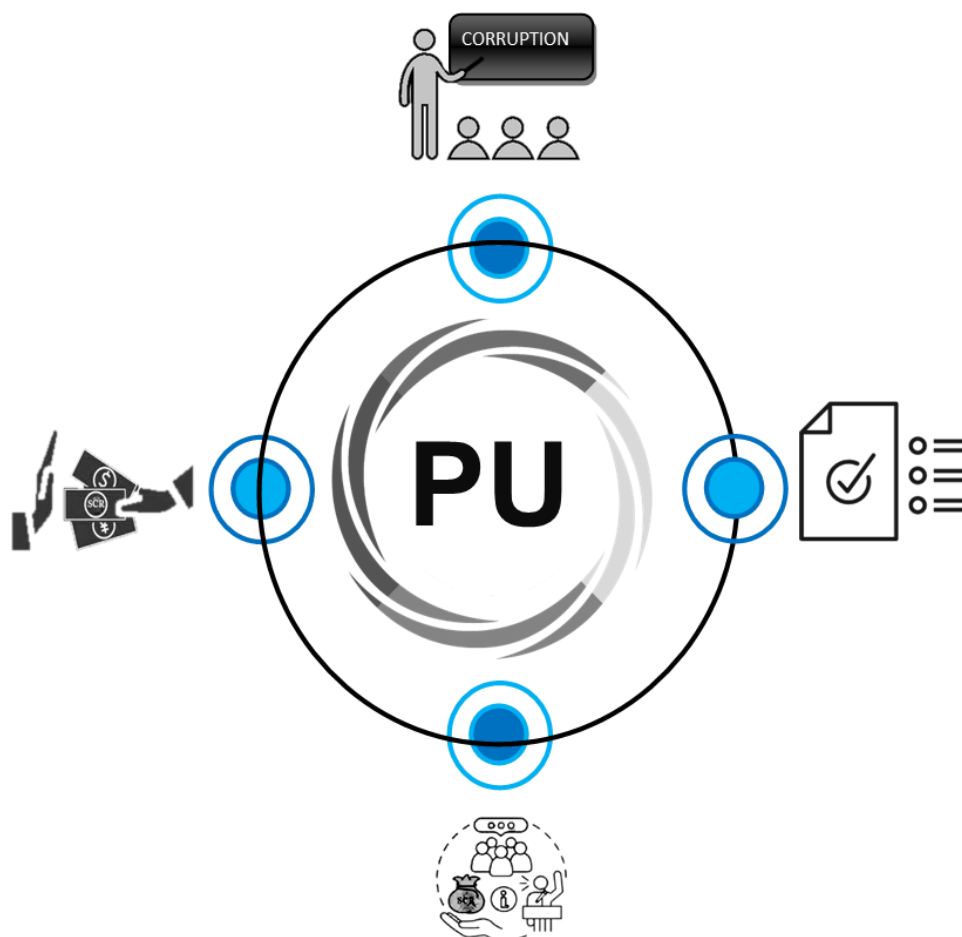
Change of investigation process

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 staff.

Concluding Remarks

In general, 2022 has been a productive year for the IU despite the challenges. It remains focused on its goals and objectives, and with continuous commitment, dedication and willingness of all staff, continuous support, and commitment of the ACCS Management all objectives set for 2023 will be achieved.

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.

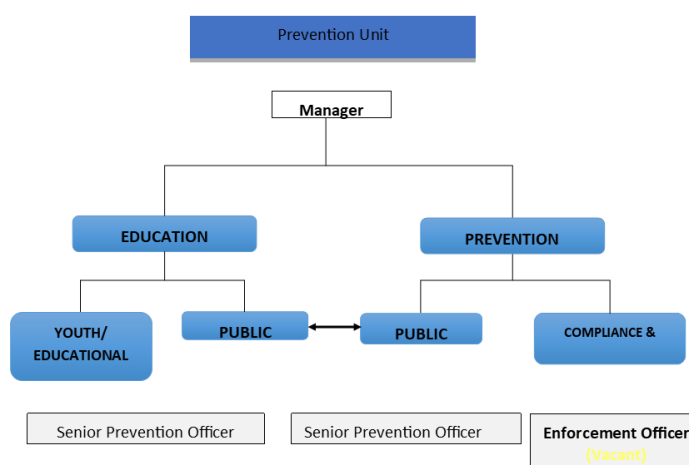
Strategic Area 2 of the ACCS STRATEGIC PLAN 2017 - 2023 addresses Corruption Prevention, of which its Strategic Objective is “To reduce on the prevalence of corruption and economic crime”

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 Senior Prevention Officers.





Anti-Corruption Awareness sessions in Public Institutions

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.

Pre-Session Meetings

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 2022, pre-session meeting were held with four institutions in preparation for Anti-corruption Awareness Session that were planned.

The Prevention Unit conducted 10 sessions in three Public Institutions:

- Ministry of Family Youth & Sports - 1 session
- Highway Patrol Unit - 1 session
- Ministry of Land and Housing - 8 sessions

A total of twelve sessions were targeted for the year 2022.



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

Activity 1: Provide advisory services on corruption prevention.

The Department provided advisory services and support in terms of material to one Private organisation in the tourism industry.

Assistance was also sought by the management of Trafficking in Person (TIP). Labour exploitation, human trafficking, human behaviour and other points were discussed. An awareness presentation was yet to be scheduled for the special task force which consists of personnel from the Immigration, Social Services, CID, Employment department and NGO's.

A site visit was also set to see how the task force operates to be followed up by awareness sessions, but the TIP office could not set a definitive date.

Education Sector and the Youth

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

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

- Anti-Corruption School Awareness sessions were conducted in 10 public schools.
- Participated in the opening of Careers Week.
- Participated in careers week in five schools
- Two Anti-Corruption Awareness sessions were held with teachers.
- Youth Against Corruption Group members participated in the Youth Forum on Anti- corruption which was aired on the International Anti-Corruption Day - 09th December.
- Youth Against Corruption group members participated in the International Anti-Corruption Day forum organise by the Anti-Corruption Commission Seychelles.
- Youth Against Corruption Group Facebook page created and it is up and running



**Targets not achieved**

- Building the knowledge capacity of PSCE teachers/ teachers on Anti-Corruption
- Training for the teachers in all the schools was targeted for the year 2022. With time being an issue, only two schools covered.
- Conduct examinations to identify and seal corruption loopholes

Trainings and Workshop

- Ethics & Transparency- Dr. Susan Opp, in collaboration with Citizens Democracy Watch Seychelles (CDWS)
- How to recognize information influence operations? - *Lund University Sweden*
- Webinar- CAACC Round Table Discussions - Build up to the Commemoration of African Anti-Corruption Day 2022
- *Identification & Handling of Suspicious Cash*- Financial Intelligence Unit (FIU) Seychelles.
- Taxation, their laws and regulations and guidelines- Seychelles Revenue Commission (SRC)
- NUIX- In Collaboration with National Crimes Agency (NCA), UK.



Challenges

- Last minute cancellations for awareness sessions by public institutions due to shortage of participants with the persistence of COVID-19.
- Low support and commitment from schools and some public institutions.
- Limited human resources.

Strategy to overcome areas of under-performance

- More staff are required to effectively implement the targeted Risk Assessment
- 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.
- Organise session with the cabinet of ministers to brief on plan and objectives to ensure commitment from ministerial departments.

Concluding Remarks

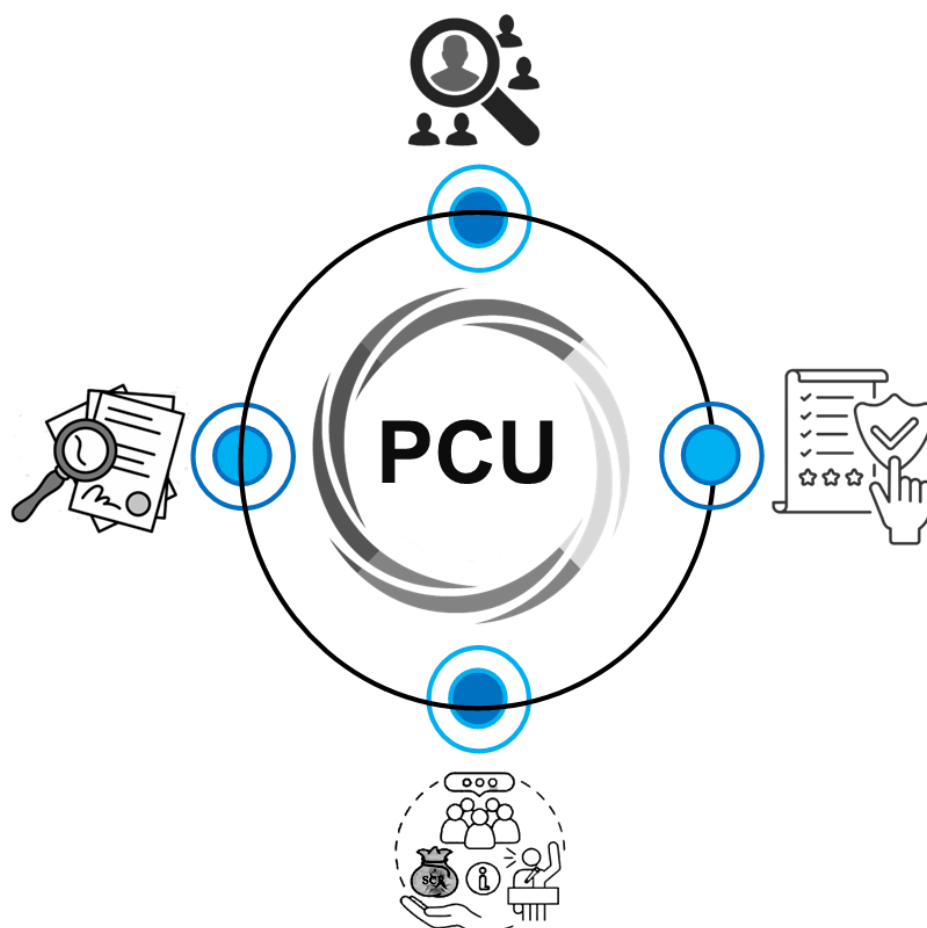
Although the Unit has not been able to achieve some of its targets, it has been very supportive to the Commission. Human resources were redeployed to assist Project Black Iron and staff utilised to review potential evidence and prepare trial bundles in preparation for service of the case.

The officers have also been very supportive of each other in the delivery of the awareness sessions and training. Teamwork was well implemented during the reporting year.

The Unit also manages to work on the contents for its new Strategic Plan to include the ethics component with the Senior Prevention Development Officer from the Public Officers Ethics Commission joining the Unit late during the year.

Provision of the ACA, 2016 will be reviewed to ensure that institution comply with request for Education and Awareness.

POLICY AND COMPLIANCE UNIT





OVERVIEW

The Policy and Compliance Unit (PCU) report for 2022 outlines the following two functions:

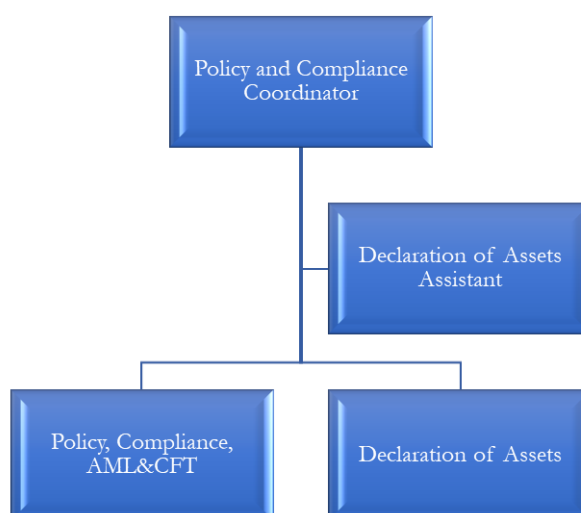
- Policy and Compliance: making relevance of ACCS obligation to comply with international standards to combat corruption and money laundering as well as other relevant crimes.
- Public Officer's Declaration of Assets: making relevance to senior public officers in Seychelles to submit their annual declaration of assets (DoA) to the ACCS.

Both functions are currently undertaken by the Policy and Compliance Coordinator with the assistance of one Declaration of Assets Assistant specifically for the DoA function.

These two functions are in line with amendments made to the Public Officers Ethics (POE) Act 2008 by which the ACCS received additional mandate to oversee the implementation of the General Code of Conduct and Ethics and the Declaration of Asset, Income and Liabilities of Public Officers.

To be able to successfully perform its functions as a supporting department, the PCU works pro-actively with all existing ACCS units and maintains good working relationships with many departments and units.

PCD Structure





Objectives for the year 2022

- The national AML&CFT institution obligations
- Declaration of Assets, Income and Liabilities – POE Act 2008

These two objectives were the main focus for the unit in 2022, due to the institution's statutory obligations with both national and international commitments as an LEA.

The National AML&CFT obligations

The ACCS is a member of the National AML/CFT Committee (NAC) and the Technical AML/CFT Committee (TAC), whose mandates are to guide, support, implement and oversee national policies for combating money laundering and terrorist financing offences in line with the Financial Action Task Force (FATF) recommendations and the Seychelles National Strategic Plan 2020-2023.

ACCS is mandated under the AMLA 2020, to investigate and prosecute money laundering offences arising from corrupt practices. This mandate has a binding reporting obligation to the ESAAMLG – a regional body of the FATF - for both regulatory and operational aspects. The reporting is done at both institutional and country level.

The PCCU also undertakes additional duties and responsibilities with the ESAAMLG secretariat by participating in country follow-ups and progress reviews. The finding of the reviews conducted are outlined in reports that are presented during the ESAAMLG Task Force Plenary, which takes place twice a year, one in Tanzania and other meeting takes place in the country that holds the Task Force presidency for a period of one year.

Seychelles National Risk Assessment (NRA)

As per FATF recommendation 1 ***“Countries should identify, assess, and understand the money laundering and terrorist financing risks for the country, and should take action, including designating an authority or mechanism to coordinate actions to assess risks, and apply resources, aimed at ensuring the risks are mitigated effectively.”***

Seychelles is currently undertaking its second NRA for AML & CFT that started in June 2022, with the assistance of the World Bank. Currently there are five ACCS staff that are actively contributing in the NRA on behalf of the ACCS. The report is expected to published in September 2023.



SEYCHELLES NATIONAL AML&CFT STRATEGY PLAN 2020-2023

Under the Seychelles National Strategic Plan 2020-2023, the ACCS have had to comply with recommendations provided, that will aid to strengthen its operation as per the given time-frames. Some recommendations are still work-in progress, whilst the critical ones have been completed within the specified time-frame.

The table below contains the objectives that are in line with the FATF recommendations for law enforcement agencies (LEAs) to operate effectively to combat ML offences.

STRATEGY CORE PRINCIPLES	STRATEGY ACTION	STRATEGY DESIGNATED COMPLETION TIMELINE	ACCS STATUS
STRATEGIC OBJECTIVE 1: Enhancing Seychelles' legal framework consistent with the international standards for ML/TF and PF			
1.2	Strengthen the legal capacity of the ACCS to conduct investigations and prosecute ML/TF cases.	December 2020	Completed since May 2022.
STRATEGIC OBJECTIVE 2: Strengthening domestic and international cooperation in the fight against ML/TF and PF.			
2.1	Instituting mechanisms and procedures among the relevant agencies to improve and enhance domestic coordination and cooperation in the fight against ML/TF and PF.	March 2021	First MoU established in August 2020 with the FIU, followed by: FSA and SRC in 2020, and CBS, SRC and RG in 2021. The process is still ongoing with other key stakeholders.
2.2	Instituting mechanisms and procedures among the relevant agencies that promotes and enhances international cooperation in the fight against ML/ TF and PF.	March 2021	First MoU established in May 2018 with ICAC Mauritius. Followed by MoU with IACCC in July 2020. Still ongoing process with other key international stakeholders.
STRATEGIC OBJECTIVE 5: Strengthening intelligence, investigations, prosecutions and confiscations of ML/TF and PF			
5.1	Prioritize the effective use of intelligence, investigative techniques and evidence gathering by enforcement agencies in the fight against ML/TF and PF; while also promoting the capacity of the Judiciary to adjudicate ML/TF cases.	August 2021	Actively ongoing through capacity building via trainings – both local and international. EU consultants and others are proactively providing on the job training to ACCS staff for both investigations and prosecutions of cases.
5.2	Establish and implement effective measures for criminal and civil asset freezing, seizure and confiscation of the proceeds and instrumentalities of crime.	August 2021	Established joint agreement with Asset Reality (UK) December 2021 for the managing aspects of properties seized/freeze by ACCS.
5.3	Implement enhanced measures at the border to strengthen controls on cross-border movements of cash and similar instruments.	December 2020	The MoU between SRC and ACCS provides for joint working and exchange of information. MoU established in March 2021.



Declaration of Assets, Income and Liabilities – POE Act 2008

As per the April 2021 amendments to the POE Act 2008, the ACCS received the mandate as the oversight body for the DoA functions in the Seychelles public sector.

Senior officers in the public sector have to declare their wealth annually as per the POE Act. For 2022, the ACCS received submissions from 18 different public sectors as per the list below:

Office of the Executive
The Judiciary
The Legislature
LEAs
Military
Intelligence
Public Administration
Finance
Information and Technology
Legal
Energy
others

The PCU together with the assistance of the ACCS IT unit have managed to complete the digitalizing of the DoA process through the purchasing of a CMS, made possible through the EU assistance. The CMS will complement the DoA function to make it more efficient, and will facilitate for transparency and verifications of the declarations as per the standard. ACCS aims to have the DoA electronic submission launch officially before mid of 2023.



Challenges

Like other departments within the ACCS the human resources of the PCU are stretched and this is a real deficiency for the unit. Currently only the PCU is tasked with gathering external reports for ACCS, which is a lengthy and time-consuming exercise, requiring time and project management skills. There is a need to carry out internal assessments of unit's performance that will aid in identifying gaps and prioritising capacity building that will counter current vulnerabilities.

Another constraint with human resources negatively impacts the cycle of DoA submission made by the MDAs to the ACCS. With the manual practice still taking place for DoA submissions, it is impossible for the unit to successfully collect submissions from all existing MDAs in Seychelles within one year. The exercise to identify eligible public officers is quite challenging as MDAs have no experience or comprehension of the respective legislations, due to lack of awareness and communication from the previous Commission responsible.

There is a need to synergize the process for internal data collection that will facilitate the external reporting obligations efficiently.

Strategies to overcome challenges

- The current POE Act 2008 needs a thorough review against the DoA standards and best practices. The gap analysis review will contribute to identifying the significant changes required to ensure the legislation can function effectively.
- Recruitment of an additional staff to assist with both the compliance and DoA operations, to complement the weight of work that needs to deliver effectively.

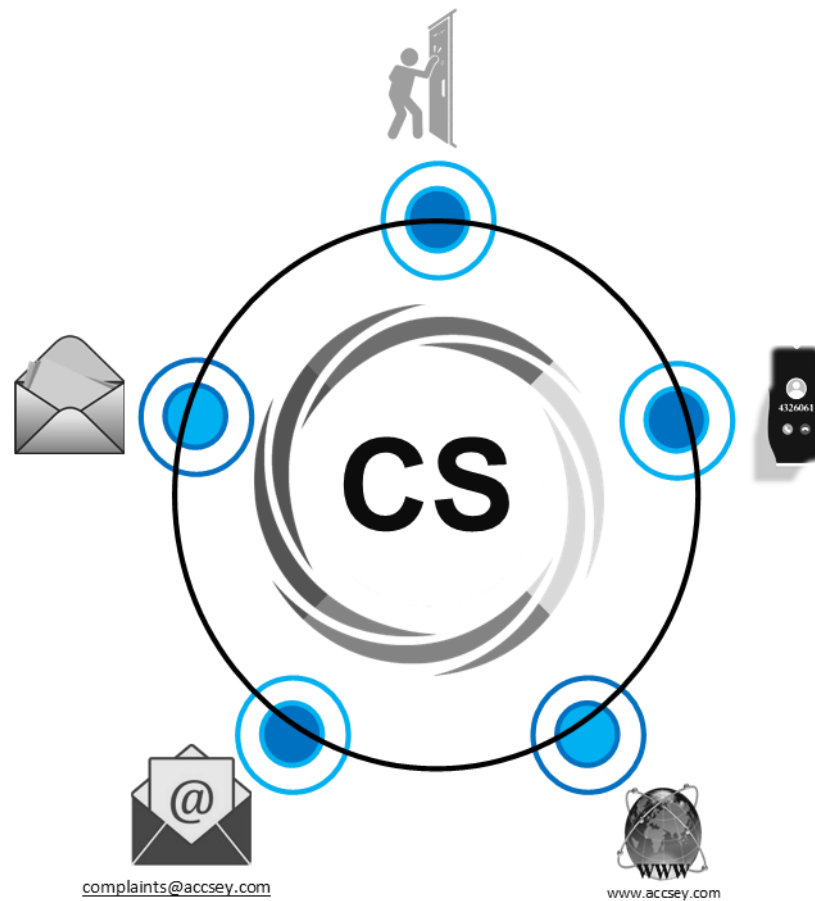
Way Forward for 2023

The objectives of the PCU will remain constant in the year ahead, with continuity for tasks that are still outstanding.

Emphasis will be more on the transformation in the DoA process to phase out the manual aspect and introduce the electronic mode.

Synergies in data collection will also be a priority, that will facilitate easy access to relevant internal data for external reporting.

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

ACCs financial activities are governed by the Ministry of Finance Financial Regulations, which are approved by the National Assembly.

Every year, the Commissioner presents a Program and Budget to the National Assembly for approval. It details objectives, performance measures and budgetary planning for all proposed activities. The Program and Budget provides an overall strategic context of the Institution's Strategic Plan.



The approved budget allocation for the commission for the year 2022 was SR18,516,957.15 as detailed in the following table:

Wages & Salaries	SCR 12,485,056.17
Goods & Services	SCR 5,754,650.98
Minor Capital	SCR 277,250.00

Additional Funds

With the ongoing sensitive operation, additional funds were found to be necessary and amount of SCR **63,615,221.00** was therefore allocated to effectively carry out the operation.

The revised budget for 2022 therefore was SR 82,132,178.15

The total expenditure of 2022 amounted to SR 76,641,826.88

Payroll

During the year of 2022, three new members of staff were added to the payroll.

Donation

ACCS received a donation of the following items from the British High Commission during the year 2022;

- 12 laptops
- 8 office chairs
- 1 photocopier
- 5 doodgee smartphones
- 15 CAT rugged phones



Human Resources and Administration

Overview

The Human Resources and Admin Unit provides consistent strategic support to all ACCS Units to achieve their targets as outlined within the ACCS Strategic Plan 2018-2023. The Unit is responsible for the planning, implementation, managing and running of all the human resources activities, from workforce planning to employee exit inclusive of staff welfare and administration (managing of the admin store i.e., consumables, office supplies/stationaries and cleaning materials) activities of the organisation.

In line with the Commission's Vision, Mission, Core values, Strategic Goals, Themes and Objectives, the Unit aims to work collaboratively with the operation units, in support of their strategies, providing the best possible human resources to build a vibrant, efficient, and effective team of the right calibre, integrity and experience to tackle the scourge of corruption.

The HR&A Unit developed its own vision and mission to enable it to be more focussed in achieving its objectives and that of the Commission's.

Vision

The Human Resources and Administration Unit will be the model for high quality, responsive, and customer-focused service. Proactive, simplified processes will be developed and continually refined. The focus of our effort is aimed at informing, enabling, and fully supporting ACCS' management, unit heads and individual employees to establish, develop, and nurture cooperative ties which will facilitate the achievement of ACCS' mandates.

Mission

The mission of the Human Resources and Administration Unit is to support the goals and challenges of the ACCS by providing services that promote a work environment that is characterized by fair treatment of staff, open communications, personal accountability, trust, and mutual respect. We seek to provide solutions to workplace issues that support and optimize the operating principles of the organization by:

- Ensuring that HR and Admin personnel are given the tools, training, and motivation to operate in the most efficient and effective manner.
- Promoting and recruiting the best-qualified people and recognizing and encouraging the



value of diversity in the workplace.

- Providing a competitive salary and benefits package and developing the full potential of our workforce by providing training and development for career enhancement.
- Providing a work atmosphere that is safe, healthy, and secure, as well as conscious of long-term family and community goals.
- Establishing, administering, and effectively communicating sound policies, rules and practices that treat employees with dignity and equality while maintaining company compliance with employment laws, and corporate directives.

Core Values

In support of our organization's overall principles, values, vision and mission, our core values are:

Integrity: We honor our commitments and conduct our operation in a manner that promotes fairness, respect, honesty, and trust.

Teamwork: We encourage the diversity of thoughts, experiences, and backgrounds and celebrate participation and partnership in all our endeavors.

Change and Innovation: We are open to possibility and foster creativity and risk-taking to support continuous improvement of our Unit and our entire organization.

Positive Leadership: We believe that leadership is a choice, not a position. We are committed to demonstrating and maintaining positivity in our relationships, workplace environment, and our communication with others.

Quality Results: We believe that everyone deserves excellent customer service and quality results.



Year in Review

This year's objectives for the Unit were to firstly clear out the outstanding issues as per the handover list from the previous Unit head. Secondly it was to devise a retention strategy for the organization. Following an initial analysis of the situation was conducted, and a series of issues were identified. Subsequently, a strategic plan was devised with key strategies and objectives compiled to address those issues. The below strategic goals have been identified;

- The overall goal is to improve on staff retention and ensure that proper procedures and policies are in place for the management of our human resources.
- To build the capacity of the Commission to deliver on its mandate through effective training and development initiatives,
- To improve the work experience of our team by providing an occupationally healthy, safe, and conducive working environment.

Progress Update and Achievements - 2022

Strategy 1 – Capacity Building and Talent Management

Objectives	Remarks
Determine present and future requirements of the organization to ensure effective organisational structure and an efficient staff establishment.	The Unit continues to review the organisation's structure and positions as necessary to ensure efficiency in operation, whether through recruiting new talents, reclassifying positions, and roles, both laterally and vertically. The Unit has been able to review the recruitment process, ensuring a more open and transparent recruitment process, where all positions are firstly advertised internally, where priority is given to internal candidates.
Ensure continuous implementation of the training and development plan to improve capacity building in the workplace	Continuous training remains a priority as the Unit work towards improving the capacity of the organisation's staff. It is an ongoing process, in collaboration with Managers, the general staff as well as our external partners. This year, we have recorded forty-five different trainings conducted either internally, externally both locally and internationally in collaboration with our partner agencies and institutions. Organisational training plan in place, and continuously being updated based on feedback/requests from Managers and staff, as well as training invites from our external partners Training evaluation tool (Pending)



Objectives	Remarks
Continue to develop an equitable staff recognition programme (Benchmarking with other employers of similar grades)	The Unit is in the process of devising a comprehensive scheme of service for the organisation, covering on the following areas: • Job Evaluation and Grading • Appointment Specifications inclusive of salary ranges and quartiles • Allowances • Procedure for salary changes during job changes • Salary progression not related to job changes • Gratuity for past continuous service Same will be presented to Managers for their input, prior to submitting to the Commissioner. Once the scheme becomes operational, the review of the document will be done at least every five years, and or as and when there is a change in the Seychelles' laws.
Build and sustain a robust organisational culture	It has been a continuous process of reviewing, updating, and designing appropriate HRMD policies, procedures, practices, and processes: • Recruitment and selection procedures, inclusive of procedure for pre-employment screening and assessment centres • Procedure for Internal staff movements and processing of files (transfers, promotions, exits) • Exit Interview form • Employment Application Form • Internal staff communication • Confidentiality, Proprietary Information and Nondisclosure Agreement • Role development procedure (designing and reviewing of job descriptions) • Reviewed format for JDs • Uniform Policy • Revamped letter of offer and letter of appointment • Employee on-boarding procedure inclusive of a revamped work progress evaluation form used during the probationary period and for confirmation in post • On-the-job training plan checklist form • Leave application procedures • Employee handbook (in progress) • Training and Bonding policy (in progress) • HR Processes and Procedure Manual (in progress) Other activities attributed to this objective: • Conduct a turnover and retention analysis (Pending) • Develop and review Employee Retention Policy and tools (ongoing)



Strategy 2 - Implement Effective Internal Communication, Employee Engagement and Team Building Initiatives

Objectives	Remarks
Ensure that staff are well informed about developments within the organisation	Improvement in internal communications disseminated, where emails and memos are being sent out to communicate information as and when is necessary.
Engage regularly with Unit heads and staff to ascertain service satisfaction for continuous improvements	Through active participation in management meetings where issues are discussed, and information disseminated with the different Unit heads. Staff visits conducted by the Unit's personnel Other activities attributed to this objective: Introduce HR quarterly meetings with individual Units (Pending) Service satisfaction Survey (Pending)
Enhance team relationships through various team building activities	HR have set up a social committee to cater for the social activities geared at improving team relationships. This year's key activities have been: Labour day picnic: 28 th May 2022 Hike/Picnic: 14 th August 2022 Creole Lunch: 31 st October 2022 End of year gathering: 23 rd December 2022

Strategy 3 - Promote Occupational Health and Safety Awareness to all Staff

Objective	Remarks
Set up a conducive working environment	This objective has not been fully addressed during the reporting period, except for the management of work orders such as: - Floor repairs due to several incidents of popped up tiles - Fixing of wall cabinets - Fumigation/pest control - Fixing of office doors - Ad hoc air-conditioning problem - Toilet leakage Topic of ongoing discussions with the Landlord: - Provision for water storage - General maintenance of offices - Fire safety and emergency exit procedure - Ventilation Activities attributed to this objective are: - Develop an Occupational Health and Safety Policy conducive to our working environment - Develop the Emergency Evacuation Plan for the organisation - Educate staff on Occupational Health and Safety Policy, and Emergency Evacuation Plan at all levels within the organisation - Safety inductions undertaken with all new recruits



Strategy 4 - Implement Effective HR initiatives to promote our image externally

Objectives	Remarks
Showcase the ACCS as a reputable organisation and 'an employer of choice'	Other than providing input into the HR related section on the website, the two objectives have not been fully addressed during the reporting period. Activities attributed to those objectives are: • Participating in job fairs • Updates on our online platforms • CSR Activities such as Beach clean-ups activities, cleaning old people's homes, and the school for the exceptional child
Enhance the organisation's presence in the community through CSR activities	* Working on improving the relationship with relevant national HRMD and Administrating government bodies to elicit their support on HR related matters as and when required: • Participating in relevant meetings and forums

Strategy 5 - Manage the HRM & Admin's Finances to Optimise Efficiency in Use

Objectives	Remarks
Improve the control and management of designated budget	Ongoing quarterly budget/forecast meetings with Finance
Explore training opportunities available in the field to maximise staff capabilities	Training needs for HR have been identified and included on the organisational training plan: • Budget management • Store and inventory management
Modernise HRM & Admin processes to maximise the use of digital platforms and promote efficiency	Working in collaboration with the IT team to move towards a paperless/online service request method: • HR information systems • Store management and inventory software
Implement a defined vehicle management plan: • Maintenance Plan • Vehicle Replacement plan • Mileage monitoring	Relevant plans available and executed in collaboration with Finance Monthly audit of usage through compilation of mileage information and submitted to Finance monthly Other activity attributed to this objective: • Review the Driver, Vehicle and Mileage Policy
Establish and execute an internal audit programme	The objective has not been addressed during the reporting period. Activities attributed to it are: • Audit scope and parameters to be determine • Yearly Audits



Challenges and Recommendations

In 2022 the HR and Admin Unit has been operating reactively to clear issues from the previous Unit head's handover list, as well as proactively in assessing the requirement of new strategies to address developing issues and improve on the Unit's overall performance. Below are some major challenges encountered as well as a few pertinent recommendations.

Challenges	Remarks
Managing relationships	Relationship between managers and the general staff remain a key constraint which to some extent hinders the required changes for overall improvement and change management processes.
Engaging the workforce	Staff engagement in organisation's organised activities. The lack of team spirit which impact on commitment and overall participation
Attracting talent: E.G., Recruitment for the position of Principal Counsel	Though we have had three successful recruitments, attracting, and retaining talents remains a key issue, which I believe we will improve upon as we continue to review our recruitment and retention strategies, processes, and procedures.
Talent Retention	

Recommendations:

To ensure proper recording and audit trail, any changes to the payroll comes through a payroll change form submitted by the HR unit to the Finance Unit. That includes, but is not limited to bank salary instructions, and changes in banking details.

Involving HR more in initial discussions relating to HR and employee relations matters.

Engaging managers in relevant management communications such as discussing their Unit's budget allocation, providing feedback, as way to elicit their engagement and commitment, building on their sense of belonging and being part of the bigger picture.

To put in place budgeted funds that can be used to fund team-building activities; such that can serve to improve work relationships and overall staff commitment and performance.



Information Technology

Overview

The Information Technology (IT) Unit provides strategic support for information technology instructional services and maintains the IT infrastructure of ACCS.

In addition to providing the digital environment, the IT Unit also empower the staff with cybersecurity knowledge through awareness. This one of the highest priorities of the Unit considering that ACCS has been classified as a Critical National Information Infrastructure.

Information and Cyber Security

With ACCS being considered as a Critical National Information Infrastructure, Information and Cyber Security is perceived as a key concern to ACCS. With the increasing global and internal cyber threats and risks, the ITU have implemented several security controls. The main objective to protect sensitive data from unauthorized acts such as scrutiny, modification, recording, disruption, or destruction and secure and preserve Confidentiality, Integrity and Availability (CIA) of the privacy of important ACCS Critical National Information.

Offsite Backup

A project was initiated by the ITU to increase critical ACCS data redundancy and backups. The solution was to implement an offsite backup compliant with ISO 27001 and most international security standards. A pilot project commenced to create an offsite replication of the critical servers and services. After establishing all the logical components, the project was successful and its implementation and testing phase had no cost effect on ACCS budget. The ITU also managed to use current technology available for replication to successfully create an offsite backup at no extra cost.



Security of Infrastructure and Monitoring

To better secure the three ACCS premises, ITU has introduced a Facial Recognition System as a new security feature. This system ensures only legitimate and authorized individuals have physical access to highly sensitive areas of ACCS, and also provides an audit trail of access.

The server room is fully equipped with temperature sensors to ensure that the server room temperature remains stable.

SOCRadar

ACCS has adopted a Cloud Extended Threat Intel Platform, SOCRadar, with various tools to protect ACCS internet-facing digital assets. The platform provides detailed intelligence on dark web monitoring of any ACCS confidential data leakage, enabling IT to act fast and prevent further cyber-attacks such as accounts taking over. This includes digital protections for personal emails, work email, the official ACCS website and social media. Below are some of the features SOCRadar provides:

- **Attack surface management**
- **Digital risk protection**
- **Cyber threat intelligence**
- **Incident reports**

Cybersecurity Awareness Training

Cybersecurity is an essential element in the fight against cyber-attacks. Cybersecurity awareness training for staff and protecting against threats such as ransomware and theft is critical to the operations of the Commission and the safety of its staff.

The ITU has conducted Cybersecurity awareness training for all its staff to include top management and all its key stakeholders.

The training focussed on the common cyber security attacks that cybercriminals use, such as social engineering and phishing. Staff were also educated to identify and avoid potential threats, and mitigate cybersecurity issues swiftly and effectively, not only at work but further protect their personal digital footprint. The training complies with the ISO 27001 clause A.7.2.2 Information Security Awareness, Education & Training. **(ISMS.online, 2022)**



IT Policies

The ITU has three active policies:

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

Network & Server Policy provides a guideline of the technological resources available to staff and what is allowed and not allowed. The policy aims to protect ACCS critical information and enable ACCS use the network and server responsibly.

Work from Home Policy was initiated in the midst of the Covid-19 pandemic to allow ACCS staff to continue to work safely while maintaining the Confidentiality, Integrity, and Availability (CIA) of ACCS critical information. The policy 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 emerging technologies and technological changes, the policies are reviewed regularly. New policies will focus on cybersecurity that aligns with IT as a business enabler and security. The new policies will be a hybrid framework incorporating multiple international standards such as ISO 27001, NIST (National Institute of Standards & Technology) 800-53 and CIS Critical Security Controls (Centre for Internet Security).

A review of the ACCS Disaster Recovery Plan was conducted by the Director of IT & CS and the IT Team. An updated plan has been proposed to handle ACCS business and information security continuity in the event of a disaster. The new disaster recovery plan is comprehensive and covers the following critical ACCS services, data, and security:

- Disaster recovery management
- Disaster recovery operation management
- Disaster recovery plan flow chart
- Disaster recovery plan policy
- Disaster recovery plan team
- Disaster incident management team
- Incident management procedure
- Disaster recovery steps
- Backup storage & Security
- Damage assessment
- Data centre resilience
- Risk management
- Emergency alert & escalation
- Guidelines for social media handling

The plan has been forwarded for review and approval.

IT hardware, Cameras, Access Control



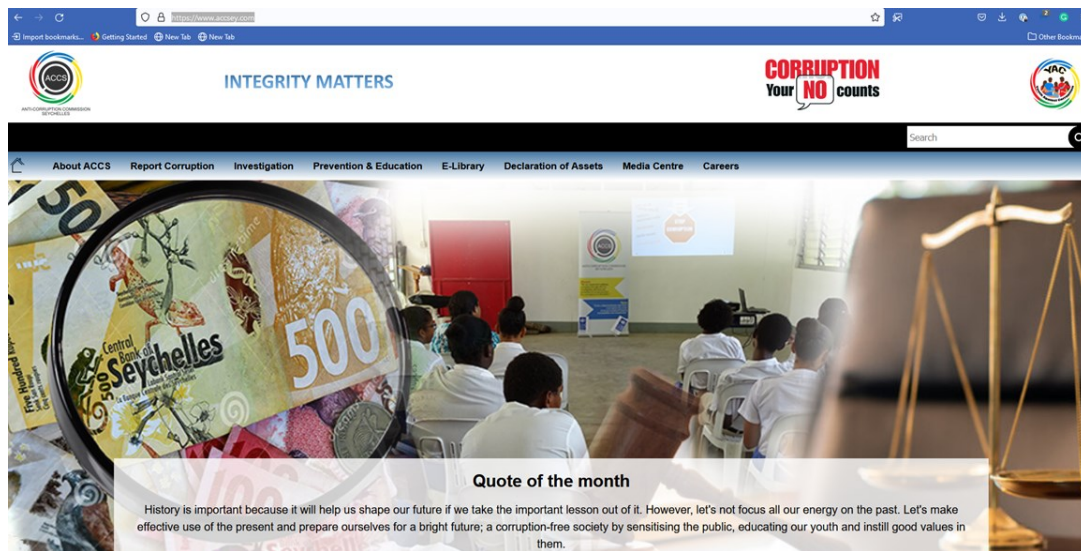
For a continuous productive environment across ACCS operations, all IT hardware is managed and maintained regularly to ensure full processing performance is achieved whenever it is needed. All ACCS IT hardware is constantly being upgraded as newer technologies available. Firmware and software are continuously patched and upgraded to provide robust security and an up-to-date IT infrastructure.

Cloud database

The case management project is in its final phase, and staff in the Complaints Unit and Investigations Unit have been trained and access control put in place. The deliverables set by Altia (case management and cloud service provider) were signed off. The platform is currently live. ITU will also work with Policy and Compliance Unit to finalise the live demo and hand-over.

Website

The ACCS website is a way to communicate and publish information to the public. The new website was rebuilt to mitigate security vulnerabilities and make the website visual more dynamic and relevant to the current technological trend.



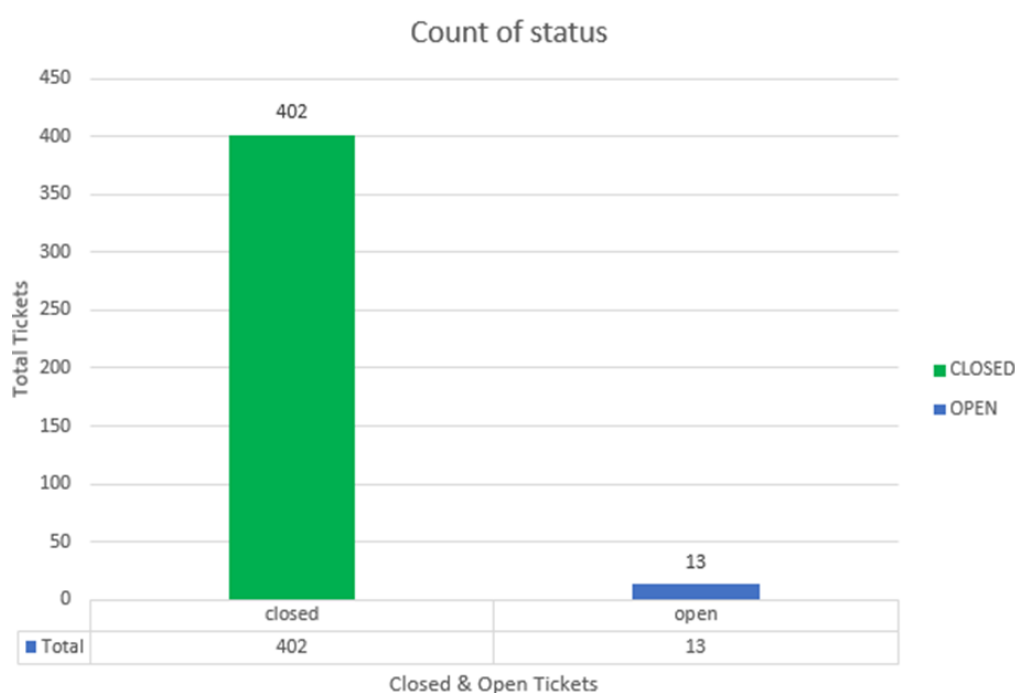


Capacity building

Maintaining an effective IT infrastructure and Cyber Security requires continuous investments in those areas. The ITU requires more funds to allow the ACCS IT Infrastructure to adapt to emerging technologies and mitigate cyber security attacks and risks.

Statistics

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



As from January to December 2022, most of the helpdesk tickets were resolved, as shown below in the statistic. **402** helpdesk IT tickets were resolved, and only **13** remained open.



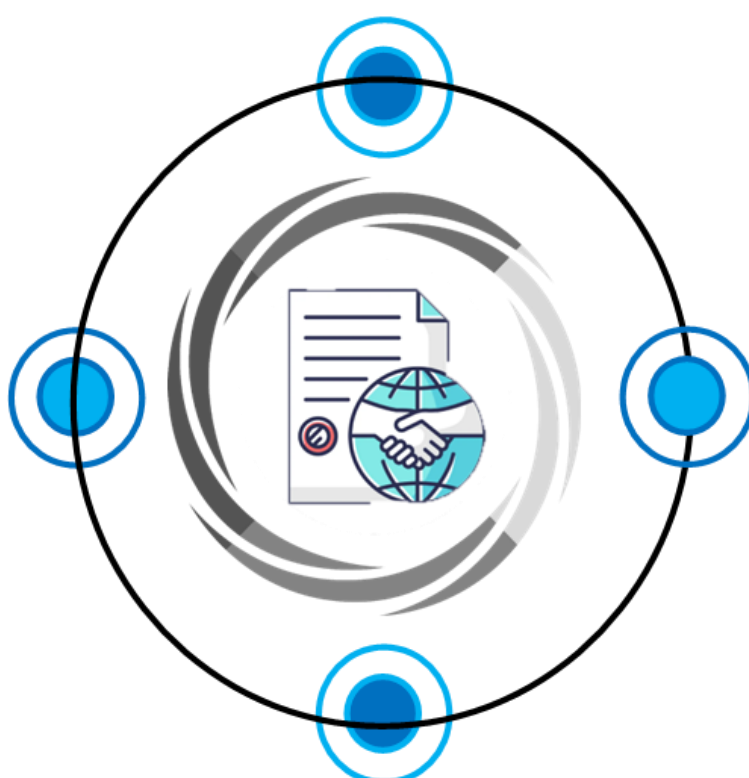
Challenges

The main constraint for ACCS IT is budget and capacity building. The current budget threshold is insufficient to keep up with the ever-changing technological landscape, IT infrastructure and mitigate the emerging cybersecurity risks and threats for which ACCS, and Seychelles, is under constant threat.

Conclusion

IT has made significant progress in improving ACCS IT infrastructure, information, and cyber security. ACCS started with no IT infrastructure back in 2017 to building a complex and up to the international standard IT infrastructure and cyber security controls. However, cyber threats and risks remain a growing concern. ACCS will have to continue financially supporting the IT unit in acquiring new technology and increasing IT staff.

INTERNATIONAL COOPERATION





Southern African Development Community (SADC)

Meetings

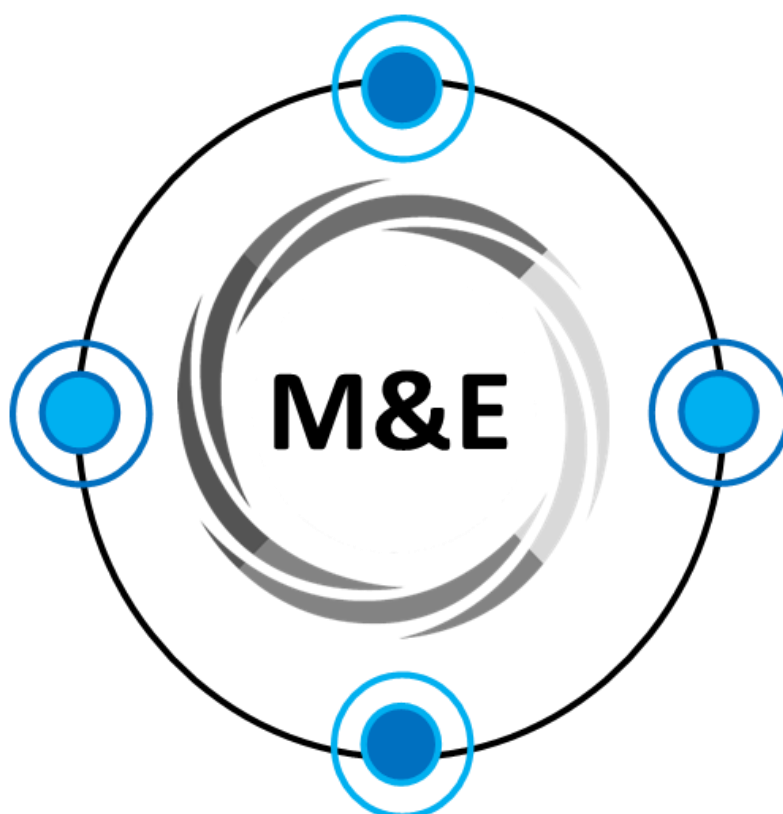
- MEETING TO VALIDATE REGIONAL ANTI-CORRUPTION MONITORING AND EVALUATION FRAMEWORK - 5th May 2022 — VIRTUAL
- SADC ANTI-CORRUPTION SUB COMMITTEE (SACC). — 13th June 2022. VIRTUAL
- VALIDATION MEETING FOR REGIONAL ANTI-CORRUPTION EFFORT INDEX FRAMEWORK—4TH August 2022. —VIRTUAL
- VALIDATION MEETING FOR REGIONAL ANTI-CORRUPTION EFFORT INDEX FRAMEWORK-
Topic: DISCUSS IMPLEMENTATION OF THE REGIONAL ANTI-CORRUPTION MONITORING
AND EVALUATION FRAMEWORK—28th September 2022
- MEETING FOR THE HEADS OF ANTI-CORRUPTION AGENCIES IN THE SADC REGION— 23rd
- 25th NOVEMBER 2022, JOHANNESBURG, REPUBLIC OF SOUTH AFRICA



ACCS has always considered international cooperation and mutual assistance 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.

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. Building on our relationship from 2021 this year the ACCS have gained invaluable technical, operational and mentoring assistance to progress our investigations and increase our continuous professional development. In particular, membership of IACCC has allowed ACCS to draw on significant IACCC resources and multiple deployments of specialist Digital Forensic (DF) Officers and criminal investigators from UK's National Crime Agency, Australian Federal Police and US Federal Bureau of Investigation in country to assist with collection of evidence and the subsequent build of, and training for a state-of-the-art DF lab which is known being used to identify and progress significant ACCS and other Seychellois high harm/impact cases.

ACCS has significantly contributed to wider international cooperation on global IACCC cases and has sought and helped secure Financial Intelligence Unit of Seychelles Associate Member Scheme membership which helps strengthen Seychelles international standing and collaboratively it is hoped Seychelles will become a regional centre of excellence.



Transparency International Corruption Perception Index (CPI)

The Corruption Perception 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). **In 2022 Seychelles was the 23rd least corrupt country in the world, as well as the highest-ranked African country with an overall score of 70.**

Seychelles was assessed using 3 data sources:

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

The statistics below show Seychelles performance for the CPI for 2021 which were published in the reporting year in January 2022.

Data Source	Rank	Score
Economist Intelligence Unit (EIU)	2 nd	72
Global Insight Country Risk	2 nd	71
Varieties of Democracy (V-Dem)	11 th	67
Overall (mean)	23 rd	70

Seychelles ranking in the **Varieties of Democracy (V-Dem)** has improved from 15th to 11th, which indicates a political commitment to fight corruption. 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
2021	1	23	70	+4

Seychelles has made significant progress on the CPI score compared to the previous year improving its rank from 27th in 2020 to 23rd in 2021.



KB Emporium (3rd Floor) Avenue de Diolinda,
Providence Industrial Estate.



4326061



complaints@accsey.com