



ANTI-CORRUPTION COMMISSION
SEYCHELLES

ACCESS TO INFORMATION 2018

ANNUAL REPORT FOR THE YEAR 2024

PUBLISHED AND SUBMITTED 10TH APRIL 2025

**(SECTION 54 STATISTICAL REPORT AND SECTION 55
CATEGORIES OF INFORMATION REPORT STANDARD
FORMAT)**

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INTRODUCTION

The Anti-Corruption Commission Seychelles (ACCS) was established following the enactment of the Anti-Corruption Act, 2016, and is a self-governing, independent body mandated to investigate, detect, prevent, and prosecute corrupt practices. It is also responsible for managing the Declaration of Assets for senior public servants and public figures under the Public Officers Ethics Act 2008 and the Public Persons (Declarations of Assets, Liabilities and Business Interests) Act 2016.

The ACCS operates in line with the United Nations Convention Against Corruption (UNCAC), which Seychelles signed in 2004 and ratified in 2006. The Commission operates independently, with no control from any person or authority.

Information Officer Info:

- **Name:** Ms. Aurestina Bonne
- **Length in Post:** Six months
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- **Phone:** 4326061
- **Mobile:** 2605957

MANDATE, VISION AND MISSION

MANDATE

To investigate, detect, prevent, and prosecute corrupt practices in the government sector as stipulated in the Anti-Corruption Act, 2016.

Amendments made to the Act in 2019, has given the Anti-Corruption Commission Seychelles policing powers and also the power to prosecute all corruption related offences.

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.

ANNUAL REPORT REQUIREMENTS (AS PER SECTION 54 OF THE ACCESS TO INFORMATION ACT)

SR No.	ATI ACT REQUIREMENTS	No.
1)	The total number of ATI requests for access received;	0
2)	<u>TYPE OF INFORMATION</u>	
	The number of requests for personal information	0
	The number of request for public domain information	0
	The number of request for third party information	0
	The number of request for commercial and confidential Information	0
	The number of request for law enforcement information	0
	The number of request for privileged documents	0
	The number of request for protection of life and safety of an individual information	0
	The number of request for National Security and defence	0
	The number of request for International relations	0
	The number of request for Economic interest of the state	0
	The number of request for Academic or professional examination and recruitment process information	0
	The number of request for proposal submitted to Cabinet	0
3)	The number of requests for access granted in full;	0
4)	The number of requests for access refuse in full;	0
	The number of requests for access refuse in part;	0
5)	The number of times each provision of Part III (EXEMPTIONS) was relied on to refuse access in full;	0
	The number of times each provision of Part III (EXEMPTIONS) was relied on to refuse access in part;	0
6)	The number of request abandoned after request	0
7)	The number of request but no records exist	0

8)	The number of cases in which the periods stipulated in section 11 were extended in terms of section 12;	0
9)	The number of review applications lodged with the head of the information holder;	0
10)	The number of reviews lodged on the ground that a request for access was regarded as having been refused in terms of section 14;	0
11)	The number of cases in which, as a result of a review, access was given to information;	0
12)	The number of request transferred to another Public Body	0

I.	A description of the steps or efforts taken by the head of the body to encourage all officers of that body to comply with the provisions of this Act; <i>To encourage compliance with the provisions of the Act, the head of the body has taken the following steps:</i> - <i>All officers and employees have been provided with a copy of the Act to ensure they are fully informed of its requirements.</i> - <i>In addition, the Act has been made permanently accessible via our internal server, allowing staff to reference it at any time.</i>
II.	Any facts which indicate an effort by the body to administer and implement the spirit and intention of the Act according to its submitted plan; <i>While the formal implementation plan is still in the drafting stage, the body has demonstrated its commitment to administering and upholding the spirit and intention of the Act. Following the succession from the previous Information Officer, the current officer has taken active steps toward finalising the draft plan, with completion anticipated by the year 2026. This transitional phase reflects a deliberate and structured approach to ensuring that the principles of transparency, access to information, and accountability—as intended by the Act—are fully integrated into the body’s operations moving forward.</i>
III.	Particulars of any penalties imposed against any person under this Act; YES ☐ NO ☒ (If yes, list down)
IV.	Particulars of any disciplinary action taken against any person under this Act; YES ☐ NO ☒ (If yes, list down)

THE CATEGORIES OF INFORMATION (AS PER SECTION 55 OF THE ACCESS TO INFORMATION ACT)

Example of categories of Information as per Section 5 (1) & (2) of ATIA (delete or add to the list)

LIST OF CATEGORIES	LOCATION OF THE INFORMATION
1. manuals, policies, procedures or rules or similar instruments which have been prepared for, or are used by, officers of the body in discharging that body's functions, exercising powers and handling complaints, making decisions or recommendations or providing advice to persons outside the body with respect to rights, privileges or benefits, or to obligations, penalties or other consequences, to or for which persons may be entitled or liable;	As a law enforcement agency, the Anti-Corruption Commission Seychelles (ACCS) operates in strict accordance with the Anti-Corruption Act, 2016 and its subsequent amendments, as well as the Public Officers Ethics Act, 2008, and the Public Persons (Declarations of Assets, Liabilities, and Business Interests) Act, 2016. These legal instruments serve as the foundational framework governing our operations and ethical obligations. In line with our commitment to transparency and accountability, the ACCS ensures that complainants are informed of decisions made regarding complaints submitted. Our complaints procedures are readily accessible online, and members of the public are encouraged to submit complaints through our secure digital platform: • How to Report Corruption • Online Corruption Report Form Additionally, a summary of the case-handling process—from complaint submission to investigation—is publicly available on our website: • Authorised Investigations Process While the ACCS upholds transparency, certain internal manuals, procedures, and operational rules are not published or made publicly accessible due to their sensitive nature. These documents contain law enforcement methodologies and operational details that, if disclosed, could compromise ongoing investigations or the safety of individuals. Their non-disclosure is in

	compliance with Sections 23 (Protection of life, health, and safety of an individual), 25 (International Relations), and 27 (Law Enforcement) of the Access to Information Act. Conversely, policies relating to support functions such as Human Resources, Finance, and Administration adhere to broader public sector governance instruments, including the Employment Act, Public Service Orders and Manual, Accounting Manual, and the Public Finance Management Act—all of which are publicly available. Any newly developed internal policies or operational updates are formally communicated to staff and stored on our internal server for continuous access and reference.
2. the name, designations and other particulars of the Information Officer of the public body, including his or her contact details and electronic addresses where persons may submit requests for information;	Information Officer: - Name: Ms. Aurestina Bonne - Designation: Human Resources and Administration Manager (currently serving as Information Officer) - Contact details: 4326061 or 2605957 – Email: hrae@accsey.com These have been submitted to the Commission and communicated to staff.
3. any prescribed forms, procedures, processes and rules for engagement by members of the public with the public body	The Anti-Corruption Commission Seychelles (ACCS) is committed to transparency and public accountability, and accordingly adheres to the Access to Information Act as well as internal guidelines governing public engagement and information sharing. To facilitate access, the Commission has developed user-friendly forms for the public to request information or report concerns. However, in accordance with Section 27 (Law Enforcement) of the Access to Information Act, the release of certain information may be lawfully refused if its disclosure poses a risk of prejudicing ongoing investigations, legal proceedings, or operational integrity.

	As part of its public-facing services, the ACCS offers multiple avenues for reporting suspected corruption: • Via the online reporting form: Report Corruption Online • Or directly via email: complaints@accsev.com To further ensure accessibility and encourage reporting, this dedicated email address is also included in the email signature of all official ACCS correspondence. These reporting channels are designed to ensure that submissions are handled confidentially, efficiently, and with the seriousness they deserve—reflecting the ACCS’s ongoing commitment to integrity and public trust.
4. the particulars of any arrangement, statutory or otherwise, that exists for consultation with, or representation by, members of the public in relation to the formulation or implementation of its policies, or similar documents;	While the ACCS engages with the public primarily through formal channels for reporting corruption and requests for information, there are no ongoing formal public consultation processes for policy formulation. Consultation with the public is limited to the scope of complaints, reports, and requests handled by the Commission. As a law enforcement agency, this process is subject to Section 27 (Law Enforcement), which may restrict certain public engagement activities.
5. where meetings of the public body, including its boards, councils, committees or similar other bodies are open to members of the public, the process for direct or indirect engagement and where a meeting is not open to the public, the contents of submissions received, the process for decision making and decisions reached	Meetings of the Anti-Corruption Commission Seychelles (ACCS), including those of its Advisory Council and committees, are generally not open to the public due to the sensitive nature of the Commission’s work and the potential for interference with ongoing investigations. In accordance with Section 27 (Law Enforcement) of the Access to Information Act, the disclosure of meeting details or submissions received is restricted if such disclosure could hinder the administration of justice or the detection of crimes.

	However, the ACCS values collaboration and transparency in its work. As such, the Commission actively consults with its partner institutions prior to the enactment or implementation of new laws or amendments, ensuring that key stakeholders are engaged in shaping the legal framework that governs anti-corruption efforts.
6. detailed information on the design and execution of any subsidy programmes implemented with public funds, including the amounts allocated and expended, the criteria for accessing the subsidy, and the beneficiaries	The ACCS does not administer subsidy programs. As a law enforcement body, its functions are focused on the prevention investigation, detection, and prosecution of corruption. There are no public funds allocated to subsidy programs at this time.
7. all contracts, licences, permits, authorisations and public-private partnerships granted by the public body;	As a law enforcement agency, the Anti-Corruption Commission Seychelles (ACCS) does not grant licenses, permits, or engage in public-private partnerships in the same manner as other public bodies. Consequently, information regarding specific contracts or authorisations held by the Commission may be subject to restrictions under Section 27 (Law Enforcement) of the Access to Information Act. Disclosure of such information may be withheld if it could potentially compromise law enforcement activities, ongoing investigations, or the broader administration of justice.
8. reports containing the results of surveys, studies or tests, including scientific or technical reports and environmental impact assessment reports, prepared by the public body;	The Anti-Corruption Commission Seychelles (ACCS) did not conduct public surveys in 2024. However, following each prevention and education session with public institutions, feedback forms or surveys are distributed, depending on the institution. The data collected from these surveys are vital in enhancing our programs and provide valuable insights into the sources of corruption, helping us to continually refine and improve our efforts. Additionally, the ACCS publishes an Annual Report each year, which is submitted to the President and is also made available to the public online. While we are in the process of updating

	our website to provide more streamlined access to our resources and reports, this ongoing update ensures that the site will offer a more user-friendly and comprehensive experience for the public moving forward. Although there has been some backlog in updating certain content, these improvements are part of our commitment to greater transparency and efficiency in delivering crucial information to the public.
9. The particulars of its organisations, functions and duties;	The Anti-Corruption Commission Seychelles (ACCS) is a law enforcement body established under the Anti-Corruption Act, 2016. Its primary mandate is to investigate, detect, prevent, and prosecute corruption within the public sector. While the ACCS is committed to transparency, certain aspects of its operations and processes are exempt from full public disclosure due to their sensitive nature, as outlined in the Access to Information Act. Details may be made available upon request but are subject to the exemptions under Sections 21(g), 23, and 27 of the Act. For most general information, the public is encouraged to visit our official website at www.accsey.com. Please note that we are currently in the process of updating the website to enhance user experience and ensure more comprehensive access to our resources. We appreciate your understanding as we work to improve this platform.
10. Information containing interpretations or particulars of acts or policies administered by the body;	Interpretations or explanations regarding the Anti-Corruption Act, 2016 and related policies can be provided upon request, but public disclosure of specific operational details is restricted due to law enforcement exemptions. As such, general guidance may be available, but sensitive information is not published on the public domain.
11. Details of its processes and procedures for creating, keeping, organizing and maintaining information;	The ACCS follows strict protocols for the creation, maintenance, and storage of information across all departments. These protocols ensure that data is securely managed and easily accessible

	by authorised personnel. Relevant information is stored in the respective departmental systems and on our internal servers, in line with established procedures for confidentiality and data protection.
12. A list of all the categories of information held by it or under its control;	The ACCS holds information primarily related to corruption investigations, prosecutions, asset declarations, and public sector corruption prevention measures. However, the release of specific categories of information is restricted under Section 27 (Law Enforcement) and may not be disclosed if it would prejudice investigations or the administration of justice. A directory of ACCS employees is not publicly available, as disclosing such information could compromise the safety and privacy of individuals working within the organization. However, details regarding employee roles, including their powers, duties, and titles, can be made available upon request, subject to the exemptions outlined in Section 21(g) and Section 27 (Law Enforcement) of the Access to Information Act. When recruiting for positions, the ACCS provides clear information about the main duties and responsibilities of the role, along with the recruitment procedures. Candidates are also fully informed of the next steps in the process during their interview, ensuring transparency and clarity throughout the recruitment journey.
13. A directory of its employees including their powers, duties and titles, indicating the permanent staff, the temporary staff and the outsourced staff, recruitment procedures and vacancies;	
14. The salary band for each public employee and officer, including the system of compensation as provided in its laws, and the procedures followed in its decision-making process, including channels of supervision and accountability;	Salary bands for ACCS employees are managed according to government regulations but are not publicly disclosed. The compensation system is in accordance with the Public Service Order/Manual which are publicly available.
15. A description of the composition, functions, and appointment procedures of the boards, councils, committees, and other bodies consisting of two or	We have an Advisory council. In April 2021 an Advisory Council was formed to oversee the administrative policy of the ACCS and is comprised of a chairperson and three other members.

more persons, constituted for the purpose of advice to or managing the public body;	The members of the Advisory Council are 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 as of 31st December 2024 are: - Mr Bernard Pool - Chairman - Ms Karine Dick – Member - Mrs Tanya Thyroomoody – Member - Ms Valentina Barra - Member The functions of the Advisory Council are set out in section 11 of the Anti-Corruption Act, 2016. The Advisory Council’s main objectives are to: - Oversee the administrative policy of the Commission - Review provisions in various laws pertaining to the prevention of corruption - Provide advice and guidance to the Commissioner on matters under the Act. However, the Anti-Corruption Act strictly prohibits the Council from interfering with cases engaged by the Commission. To achieve its objects, without in any way interfering with the Commission’s work, a “Terms of Reference Document” was discussed and agreed upon between the Council and the Commissioner during the year 2024. In brief, this document provides that the Advisory Council may request the following information from the Commissioner which shall be supplied within a reasonable delay: a) The Budget of the Commission. b) Operational matters with regards to staffing of the Commission. c) Status of cases, and complaints received by the Commission
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16. Detailed travel and hospitality expenses for each employee and officer, and gifts, hospitality, sponsorships or any other benefits received by each employee and officer;	ACCS employees are strictly prohibited from accepting gifts or hospitality, except in cases where they are provided by the government, such as government scholarships. This practice is in full alignment with the stipulations outlined in the Public Service Order (PSO), which governs the ethical conduct of public servants. Travel arrangements for ACCS employees are also made in accordance with the PSO, which is publicly available for reference.
17. The detailed actual budget, revenue, expenditure and indebtedness for the current financial year, including all related estimates, plans, projections and reports, including audit reports;	Budgetary details for the ACCS are managed in accordance with government regulations. Like other public entities, our budget is discussed and approved by the National Assembly, with these discussions broadcast live on television for public transparency. Once approved, the budget is gazetted and made publicly available. The ACCS does not generate revenue, and it does not engage in borrowing or lending activities. We are entirely dependent on government funding to support our operations. Additionally, the ACCS undergoes audits conducted by the Office of the Auditor General (OAG), and their reports are publicly accessible on the OAG's website, ensuring accountability and transparency in the use of public funds.
18. The annual report submitted to the information commission under section 54 of this act;	The annual report submitted by the ACCS to the Information Commission will be made available to the public in compliance with the Access to Information Act.
19. Any other relevant information	Any other relevant information may be provided upon request, but is subject to the Access to Information Act's exemptions, particularly regarding law enforcement and safety concerns under Section 27 and Section 23.

CHALLENGES

1. **Balancing Transparency and Confidentiality:**

Due to the sensitive nature of the ACCS's work, particularly concerning ongoing investigations and the safety of staff, there is a significant challenge in meeting the transparency requirements set forth in the **Access to Information Act**. Certain information cannot be disclosed, which may lead to perceived non-compliance with mandatory publication provisions.

2. **Compliance with Section 5 of the Act:**

The requirement for mandatory publication of information via publicly accessible websites is difficult to fully meet due to the varied types of sensitive data handled by law enforcement bodies like the ACCS. The challenge lies in finding a balance between fulfilling public access obligations and protecting critical operational and security details.

3. **Exemptions and Flexibility in Auditing Framework:**

While certain exemptions are outlined in the Act for law enforcement bodies, the ACCS has been marked as non-compliant in previous audits. This suggests a potential gap in understanding or flexibility in the audit framework, particularly when considering the unique operations of law enforcement entities and their need for confidentiality.

4. **Clarity and Guidance on Auditing Process:**

There is a lack of detailed guidance on the specific criteria or checklist used by auditors to assess compliance, particularly for entities with complex operational needs. Without clarity on these points, the ACCS faces difficulty in ensuring it meets all aspects of the Act, while still adhering to necessary security and operational protocols.

5. Differentiation of Operational Needs Across Entities:

The audit framework appears to apply uniform standards to all public organizations, without taking into account the distinct needs of different entities, such as law enforcement bodies. This creates challenges in ensuring compliance with the Act without compromising the integrity of law enforcement work.

INFORMATION COMMISSION

RECOMMENDATIONS

Having reviewed the Access to Information Act, 2018 and considered the findings of the last audit conducted by the Information Commission, we would appreciate further clarification regarding the checklist used for auditing public organisations, particularly in relation to the mandatory publication of information under Section 5 via publicly accessible websites. Given the nature of operations within entities such as the ACCS, there are several categories of information that we are unable to disclose—either for the safety of our staff or to preserve the integrity of ongoing investigations. Therefore, we seek guidance on how these constraints are taken into account in the audit process, as the current framework may inadvertently lead to an appearance of non-compliance.

Furthermore, while the Access to Information Act provides certain exemptions for the ACCS, the last audit report still marked the Commission as non-compliant in some areas. We would appreciate further insight into the audit framework, particularly its flexibility in accommodating the varying operational needs of different entities. Understanding this will help us ensure that we align with the spirit of the Act while also addressing the unique challenges that law enforcement bodies face in maintaining both transparency and confidentiality.

DECLARATION

I declare that in accordance to Section 54 of the Access to Information, Act 2018, the Annual Report are to the best of my knowledge, true, accurate and complete as per the requirements.

Aurestina Bonne
Name of Information Officer

[Signature]
Signature

10 April 2025
Date

I confirm that this Annual Report is verified and true, accurate and complete to my knowledge as the Head of Information Holder of **(Insert the name of Public Body)** on the date stated below.

MAY DE SILVA
Name of Head of Information Holder

[Signature]
Signature

Dated this 10th day of April, 2025

