



ACCESS TO INFORMATION 2018

ANNUAL REPORT FOR THE YEAR 2025

PUBLISHED AND SUBMITTED 31ST MARCH 2026

**SECTION 54 STATISTICAL REPORT AND SECTION 55
CATEGORIES OF INFORMATION REPORT**

TABLE OF CONTENTS

INTRODUCTION	1
MANDATE, VISION AND MISSION.....	2
ANNUAL REPORT REQUIREMENTS (AS PER SECTION 54 OF THE ACCESS TO INFORMATION ACT).....	3
THE CATEGORIES OF INFORMATION (AS PER SECTION 55 OF THE ACCESS TO INFORMATION ACT).....	6
CHALLENGES.....	16
RECOMMENDATIONS.....	17
DECLARATION	18

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:** Eighteen months
- **Email:** informationofficer@accsey.com
- **Phone:** +248 4326061
- **Mobile:** +248 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 (<i>EXEMPTIONS</i>) was relied on to refuse access in full;	0
	The number of times each provision of Part III (<i>EXEMPTIONS</i>) 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 its internal server, allowing staff to reference it at their convenience.</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>As part of the implementation plan, the Information Officer conducted an audit of the website. After auditing the website, made recommendations regarding updating the website including recommending a dedicated section for Access to Information. This reflects the continuous 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, upholding the spirit and intention of the Act.</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 (E-Library) 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 its operations and ethical obligations. In line with its commitment to transparency and accountability, the ACCS ensures that complainants are informed of decisions made regarding complaints submitted. Its complaints procedures are readily accessible online, and members of the public are encouraged to submit complaints through its 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 its website: • Authorised Investigations Process The ACCS also makes available other key public-facing resources that guide ethical conduct and institutional governance. On its website (E-Library), the public may access its Resource Management Guide, Stakeholder Management Guide, as well as the Managing Conflict of Interest Handbook.

	Its recruitment process is also posted online under the Careers page and queries related to same can be forwarded to careers@accsey.com, ensuring openness and fairness in employment opportunities within the Commission. 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, Code of Conduct, 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 its 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;	The designated Information Officer of the Anti-Corruption Commission Seychelles (ACCS) is as follows: - Name: Ms. Auresina Bonne - Designation: Human Resources and Administration Manager - Contact details: 4326061 or 2605957 - Email: informationofficer@accsey.com These particulars have been formally submitted to the Commission, communicated to staff, and made accessible online in the ACCS' Publication Information Manual (E-Library).

3. Any prescribed forms, procedures, processes and rules for engagement by members of the public with the public body	Public involvement in the formulation of policy and the exercise of the powers and duties of the ACCS is facilitated through structured mechanisms of engagement, cooperation, and accountability, as provided under the Anti-Corruption Act, 2016. Members of the public play a central role in the Commission's preventive and investigative mandate by lodging complaints and reports of alleged or suspected corrupt practices. Such complaints may inform investigations, contribute to policy review, and support recommendations issued by the Commission. In line with its commitment to transparency and accountability, the ACCS ensures that complainants are informed of decisions made regarding complaints submitted. Complaints procedures are readily accessible online, and the public is encouraged to report corruption through the Commission's secure digital platform: • How to Report Corruption • Online Corruption Report Form The public may also provide information, documentation, or other relevant material to assist the ACCS in carrying out its investigative and preventive functions, subject to legal safeguards and confidentiality requirements. Beyond enforcement, the ACCS actively engages citizens through public education, outreach, and awareness initiatives, including seminars, workshops, campaigns, and forums aimed at promoting integrity, transparency, and corruption prevention. Feedback received through these engagements may contribute to the development and refinement of the Commission's policies, strategies, and preventive measures. To promote public accountability, the ACCS publishes annual reports (E-Library) and other informational materials outlining its activities, achievements, and challenges, thereby enabling public scrutiny and informed engagement with the work of the Commission. Public participation, however, does not extend to directing or interfering with ongoing investigations, prosecutorial decisions, or confidential operational matters. As a law
--	---

	enforcement agency, certain engagement activities may be restricted in accordance with Section 27 (Law Enforcement) of the Access to Information Act and other applicable legislation.
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, public education 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, public education, and requests handled by the Commission in accordance with its mandate under the Anti-Corruption Act, 2016. Public participation does not extend to directing, influencing, or interfering with ongoing investigations, prosecutorial decisions, or confidential operational matters. As a law enforcement agency, this process is subject to Section 27 (Law Enforcement) of the Access to Information Act, 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 ACCS, including those of its Advisory Council and committees, are 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.

EB

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 programmes. 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 programmes at this time.
7. All contracts, licences, permits, authorisations and public-private partnerships granted by the public body;	As a law enforcement agency, the 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 ACCS did not conduct public surveys in 2025. 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 essential in enhancing the Commission's programmes and provide valuable insights into the sources of corruption, allowing the ACCS to continually refine and improve its efforts. In addition, the ACCS publishes an Annual Report each year, which is submitted to the President's Office and made publicly available online. The Commission is currently updating its website to provide more streamlined access to resources and reports. These updates are aimed at creating a more user-friendly and comprehensive experience for the public. While there has been a temporary backlog in updating certain content, these improvements demonstrate the ACCS's ongoing commitment to transparency and efficiency in delivering crucial information.
9. The particulars of its organisations, functions and duties;	The ACCS is a law enforcement body established under the Anti-Corruption Act, 2016, with a primary mandate to investigate, detect, prevent, and prosecute corruption within the public sector.

	Details of the organisation, its functions, and duties are available on the ACCS website in the Publication Information Manual (E-Library). This includes the organisation's structure, as well as the roles and responsibilities of each Unit and Department. A Senior Management Directory is also provided for official contact purposes. Certain operational staff details are not publicly disclosed due to confidentiality and security considerations. While the ACCS is committed to transparency, some aspects of its operations and processes are exempt from full public disclosure due to their sensitive nature, as provided under the Access to Information Act. Specific details may be made available upon request, subject to the exemptions outlined in Sections 21(g), 23, and 27 of the Act. For general information, the public is encouraged to visit the ACCS official website at www.acceseey.com.
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, organisation, maintenance, and storage of information across all departments, ensuring that data is securely managed and accessible only to authorised personnel. Relevant information is maintained in the respective departmental systems and on the Commission's internal servers, in line with established procedures for confidentiality and data protection. Some Units have specific Standard Operating Procedures (SOPs) for the creation, organisation, maintenance, and storage of information, which are also aligned with the requirements of the Data Protection Act. In addition, Finance, Human Resources, and Administration adhere to the Public Service Orders (PSO), the Procedures Manual, the

23

23

	Public Service Management Act, and its Regulations, ensuring information is managed in a secure, organised, and compliant manner.
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.
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;	The ACCS maintains an Establishment List, which contains details of its employees' post titles and indicates permanent staff as well as those on fixed-term contracts. Detailed job descriptions are maintained for each position, outlining the powers and duties associated with each role. While this information is not publicly accessible in full due to confidentiality and security considerations, relevant details from the job descriptions are made available in job adverts during recruitment, and the full information is shared with relevant entities upon request. Furthermore, on the ACCS website in the Publication Information Manual (E-Library), the organisation's structure and the roles and responsibilities of each Unit and Department are provided. A Senior Management Directory is also available for official contact purposes. Certain operational staff details are not publicly disclosed due to confidentiality and security considerations The ACCS recruitment process is posted on the Careers page of its website, and enquiries can be directed to careers@accsey.com. Candidates are fully informed of the next steps during their interviews, ensuring transparency, clarity, and fairness throughout the recruitment process.

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 in accordance with government regulations but are not publicly disclosed. The Commission's compensation system follows the Public Service Orders, the Procedures Manual, and other relevant Public Service policies, guidelines, and circulars, 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 more persons, constituted for the purpose of advice to or managing the public body;	The ACCS 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. 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 December 2025 are: - Mr Bernard Pool – Chairman - Mrs Tanya Thyroomoody – Member - Ms Valentina Barra – Member - Ms. Karine Dick – Member (Resigned on 15th December 2025) 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: - The Budget of the Commission. - Operational matters with regards to staffing of the Commission. - Status of cases, and complaints received by the Commission ACCS employees are 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) and the Public Officers Ethics Act, 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. Budgetary details for the ACCS are managed in accordance with government regulations. Similarly to other public entities, its budget is discussed and approved by the National Assembly, with these discussions broadcasted 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. The ACCS is entirely dependent on government funding to support its 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. The annual report submitted by the ACCS to the Information Commission is available to the public in compliance with the Access to Information Act.
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;	
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;	
18. The annual report submitted to the information commission under section 54 of this act;	

19. Any other relevant information	Any other relevant information may be provided upon request, however, is subject to the Access to Information Act's exemptions, particularly regarding law enforcement and safety concerns under Section 27 and Section 23.
------------------------------------	---

no

eb

CHALLENGES

We wish to highlight that the challenges previously submitted in 2025 regarding compliance with the Access to Information Act remain unresolved, and we have not received feedback concerning any mitigation measures, exemptions, or clarifications. For completeness, we are resubmitting the challenges for consideration, as they continue to impact the ACCS's ability to fully comply while safeguarding operational security.

The challenges are as follows:

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 organisations, 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.

RECOMMENDATIONS

Following a review of the Access to Information Act, 2018 and the findings of the last audit conducted by the Information Commission, further clarification is sought regarding the checklist and criteria used for auditing public organisations, particularly in relation to the mandatory publication of information under Section 5 via publicly accessible websites. Given the operational nature of entities such as the ACCS, certain categories of information cannot be disclosed, either to ensure staff safety or to preserve the integrity of ongoing investigations. Guidance is requested on how these constraints are considered in the audit process, as the current framework may inadvertently create an appearance of non-compliance.

In addition, although the Access to Information Act provides certain exemptions for the ACCS, the last audit report still identified areas of non-compliance. Further insight into the audit framework, especially its flexibility in accommodating the differing operational needs of public entities, is necessary. Such guidance would enable the ACCS to align with the spirit of the Act while addressing the unique challenges faced by law enforcement bodies in balancing transparency and confidentiality.

DECLARATION

I declare that in accordance with 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

Bonne

Signature

31st March 2026

Date

I confirm that this Annual Report is verified and true, accurate and complete to my knowledge as the Head of Information Holder of Anti-Corruption Commission Seychelles on the date stated below.

MAY DE SILVA

Name of Head of Information Holder

[Signature]

Signature

Dated this 31st of MARCH, 2026



