STAKEHOLDER MANAGEMENT GUIDE

AUGUST 2019

ACCS

MISSION STATEMENT

MANDATE

To investigate, detect and prevent 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

We are committed to fighting corruption through effective investigation, detection and prevention of corrupt practices for a corruption free Seychelles.

CORE VALUES

Integrity

Good governance

Transparency

Accountability

Teamwork

TABLE OF CONTENTS

Contents

FOREWORD

Various stakeholders, both internal and external, are interested and directly or indirectly impacted by the work of ACCS. They have different attitudes, different levels of interest and different levels of influence and support that they bring to bear on our work. As such, the Commission has to put in place mechanisms to manage these diverse interests and expectations. For a successful fight against corruption, it is important that the various stakeholder interests and expectations are identified, analysed and strategies developed to manage the various stakeholder relationships. The Strategic Plan 2017-2023 identified specific activities that involve both internal and external stakeholders. These have been repeated in this manual for emphasis and clarity.

The Stakeholder Management Manual outlines a stakeholder management approach that should guide ACCS Management and staff to develop standard operational procedures for the identification, analysis, engagement, evaluation and improvement of stakeholder issues and relationships. Also contained in this manual is ACCS' Stakeholder Management Policy. The Policy is to guide ACCS's approach to communicating and working with stakeholders. It is an integral part of developing an understanding of ACCS's stakeholder's needs, interests and expectations and assist ACCS with strategic and sustainable decision-making. While ultimate responsibility with stakeholder engagement rests with the Commissioners, ACCS' management and staff are mandated to maintain inclusive, mutually beneficial relationships with stakeholders and be proactive in engaging with them in a transparent manner.

United Against Corruption!

……………………………………………………

HON JUSTICE DUNCAN GASWAGA

CHAIRMAN

Date……………………

LIST OF FIGURES

CHAPTER 1: INTRODUCTION

1.1   Definitions

Stakeholders

Stakeholders are persons or groups with different attitudes, levels of interest and support that have an influence on the work of an organisation. They are impacted positively or negatively by the work of ACCS. Some of the stakeholders interested in the work of ACCS include:

- Partner organisations, governmental, intra-governmental and non-governmental.
- Regulatory bodies, national and international.
- National and Local authorities.
- Social, political and religious groups.
- ACCS staff.
- The media and the general public.

Stakeholder Management

Stakeholder management is about identifying, analysing and developing strategies to improve the relationships with diverse stakeholders interested in the work of ACCS. ACCS needs to understand the needs, issues and motivations of all stakeholders interested in its work and develop different strategies to win their support.

1.2   Strategic Plan 2017 – 2023

In the ACCS Strategic Plan 2017-2023 specific activities that stakeholders and ACCS can undertake have been identified. The analysis covers external and internal stakeholders indicating proposed activities and how these are expected to complement each other. A summary of the analysis has been attached in the appendix to this document *(see appendix 2)*.

1.3   Stakeholder Management Process Approach

The Stakeholder Management Process can be summed up into four main parts *(see figure 1 below)*. These include:

- Stakeholder Identification and Analysis;
- Stakeholder Engagement;
- Stakeholder Evaluation; and
- Stakeholder Improvement.

Figure 1: The Stakeholder Management Process Approach

- Determining level of influence and Interest
- Set up Stakeholder Matrix

ANALYSIS

- Building relationships, trust and communication

ENGAGEMENT

- Improving relationships
- Improving communication

IMPROVEMENT

- Monitoring and evaluating realtionships

EVALUATION

CHAPTER 2: STAKEHOLDER ANALYSIS

2.1. Identification

All groups, people and institutions, interested in and impacted by the work of ACCS, need to be identified and a list developed. This can be updated and reviewed on a regular basis. Once the list is in place it is important that an analysis is performed to determine the level of influence and interest of each stakeholder on the work of ACCS.

2.2. Analysis

Stakeholder analysis involves the identification of the interests and influence of stakeholders including their motivation, issues and positions regarding the work of ACCS. The analysis should provide ACCS with some basic measures that can help uncover and remove barriers to gain support for its work among relevant stakeholders. Information for additional plans such as a communication management plan and a risk management plan can be obtained as a result of this analysis. Furthermore, the analysis should compel ACCS to identify and support legitimate interest of key stakeholders aligned with those of ACCS. It is also important for ACCS to be knowledgeable about those stakeholder interests that cannot be supported for now. The difference between success and failure may hinge on knowing who ACCS' advocates and opponents are. The level of stakeholder influence and interest can change overtime. ACCS needs to monitor its stakeholders to detect these changes and determine whether it is worthwhile to continue engaging with some of the stakeholders.

Based on this analysis, ACCS develops strategies to maintain and win the support of stakeholders. A list that defines and identifies all the key stakeholders is developed using a two-step process as outlined below. Stakeholders are then prioritised based on the level of influence and interest they have on ACCS.

2.2.1 Determining Stakeholder Level and Type of Influence

The first step is to determine stakeholder influence. Stakeholder influence is defined as the extent to which a stakeholder is able to weight its power or authority on ACCS and therefore, affect its outcomes. Factors impacting on stakeholder level of influence include the extent of control over funding and the extent to which the stakeholder informs decision-making regarding strategic choices and implementation. Influence can be positive or negative depending on the position of a stakeholder with respect to ACCS's strategic objectives. Stakeholders with negative influence will have an agenda that is diametrically opposed to ACCS goals and objectives thereby impacting adversely on its success.

2.2.2 Determining Stakeholder Level of Interest

The second step is to determine the level of stakeholder interest in the work of ACCS. Stakeholder interest is the extent to which a stakeholder's challenges and needs are affected by ACCS' activities and desired strategic outcomes. It also includes the

level of participation or engagement of a stakeholder in ACCS' work in order to meet a stakeholder's objectives. ACCS needs to ask key questions regarding a stakeholders understanding of its strategic goals and implementation of its plans in order to achieve those goals. Using instruments such as surveys or interviews various stakeholders should be interviewed and a score attached to their responses in order to ascertain their level of interest.

2.2.3 Stakeholder Analysis Matrix

A stakeholder analysis matrix **(see table 1 below)** is used to capture information that identifies each stakeholder's position relevant to their influence, interest and level of understanding and commitment to ACCS' work.

Table1 – Stakeholder Matrix

STAKEHOLDER	INFLUENCE	INFLUENCE TYPE	INTEREST	INTEREST TYPE	CATEGORY
Donor	High	Funding	High	Strategic Outcomes	A
Beneficiaries	High	Participation	Low	Benefits	B
Partner Institutions	Low	Participation	High	Resources	C
Local Media	High	Opinion	High	Benefits	A
Local Government	High	Political	Medium	Approach	B
Management	Medium	Resource	Low	Results/Impact	B

The following steps should be followed to develop the stakeholder analysis matrix as shown in the table above:

1. Identify all the people, groups, and institutions that will affect or be affected by ACCS work and list them under the 'Stakeholder' column.
2. For each stakeholder identify their level of influence as 'high', 'medium' or 'low' under the column 'Influence'.
3. Describe the type of influence each stakeholder has on ACCS under the column 'Influence Type'.
4. For each stakeholder identify their level of interest on ACCS work as 'high', 'medium' or 'low' under the column 'Interest'.
5. Describe the type of interest each stakeholder has in ACCS work under the column 'Interest Type'.
6. For each stakeholder assign a category of impact on ACCS as follows: 'A' for high impact; 'B' for medium high impact, 'C' for medium impact and 'D' for low impact. For example: a stakeholder with 'High' influence and 'High' interest will be categorised as having a high impact 'A' while one with 'Low' influence but 'High' interest is categorised as having a medium impact 'C'.

2.3. Stakeholder Mapping

Following the identification of the stakeholder's interest, influence and impact on ACCS, a stakeholder management plan needs to be developed. The stakeholder management plan defines the strategies, approaches and methods to be used to increase the level of interest and commitment of a stakeholder and reduce any negative influence on the work of ACCS.

2.3.1 Stakeholder Categories

The development of the stakeholder management plan needs to start with the categorisation of the stakeholder into four groups that can be visualised in a stakeholder map *(see figure 2 below).* This helps ACCS customise different strategies for each category of stakeholder.

Figure 2: Stakeholder Map

Influence		Interest		
High	B	B	A
Medium	B	C	C
Low	D	D	C
	Low	Medium	High

Stakeholder Categories explained

Category A: Stakeholders in this group have a high interest level and a high influence level. Stakeholders need to be managed closely so that their interest is sustained and ACCS can leverage on their influence. ACCS should develop partnership strategies with them aimed at solidifying relationships to ensure stakeholder objectives are aligned with theirs.

Category B: Stakeholders in this group have a low to medium interest level and a medium to high influence level. ACCS should aim at building relationships to enhance interest in its work especially with those stakeholders that have a capacity to provide resources. Close attention should be paid to these stakeholders and ACCS should seek to satisfy their needs as much as possible and within agreed terms.

Category C: Stakeholders in this group have a medium to high interest level and a low to medium influence level. Their level of impact on ACCS is expected to be intermediate and needs occasional monitoring. A good communication strategy should be developed to ensure constant engagement with them to sustain their interest.

Category D: Stakeholders in this group have a low to medium interest and a low influence level. While ACCS may not pay much attention to this group, it is important that strategies are developed to keep monitoring these stakeholders for any changes in their level of interest and influence.

2.3.2   Stakeholder Relationship Strategies

Once ACCS has determined and categorised its stakeholders, it is also important that the key assumptions and risks regarding the stakeholder analysis are validated. Risks will arise when there are conflicting needs and expectations amongst stakeholders. For example, the interests of a stakeholder with high influence may not be in line with ACCS' objectives and that can become a significant hindrance to progress. It is important, therefore, that ACCS clarifies unspecified stakeholder roles and responsibilities and develops scenarios to determine the consequences of unfulfilled needs and expectations, and double checks the plausibility of the assumptions made.

In addition to understanding stakeholder's levels of influence and interest, there is a need to assess their level of participation and information needs. Key stakeholder roles need to be clarified and defined. Not all stakeholders need to be involved in all aspects of ACCS' work. Relationship strategies, similar to those demonstrated in the *figure 3 below*, need to be developed for each category of stakeholders to manage their participation and information needs.

Figure 3: Stakeholder Relationship Strategies

Category A	Category B	Category C	Category D
•Keep committed. •Meet their expectations. •Manage their relationship very closely. •Involve and consult them on critical issues.	•Keep satisified. •Understand their issues. •Find opportunities to increase their interest. •Find opportunities to get them involved.	•Keep informed. •Maintain communication. •Send them information to sustain their interest. •Find opportunities to get their opinion.	•Keep under observation. •Monitor for changes in interest and influence.

CHAPTER 3: STAKEHOLDER ENGAGEMENT

3.1. Building Relationships

A strategy to create and maintain commitment from key stakeholders is to build good relationships. Relationship building helps bridge ACCS and its stakeholders and improve the way they coordinate, cooperate and collaborate for success. Building relationships is a proactive role and ACCS needs to develop a vision of what relationship it desires for each stakeholder. ACCS management needs to be responsible for understanding the needs and requirements of the various stakeholders, communicating those requirements to staff and assuring stakeholder satisfaction with ACCS work.

Three basic approaches to building relationships with stakeholders may be utilised. These include:
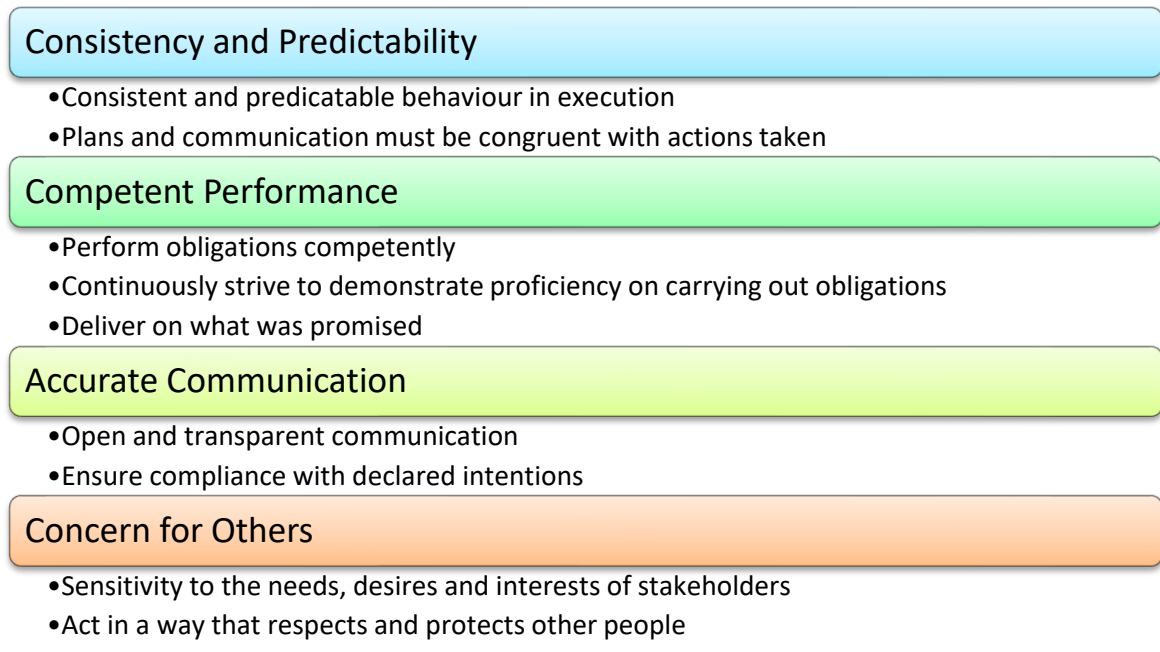
Table 2: Stakeholder Relationship Approaches

Approach	
Consult	This strategy is aimed at building and maintaining support. Consult with stakeholders to actively seek their opinions and input for key decisions. While this may not necessitate ACCS changing or modifying its overall strategy, it might influence its operational approaches to maintain higher levels of commitment.
Involve	This strategy is aimed at involving stakeholders in the planning and implementation of ACCS strategy. Stakeholders are more likely to provide support to ACCS if they are involved. ACCS should partner with them to increase their engagement and commitment and at the same time tailor its strategic approach to win their support. Involvement helps build ownership and buy-in.
Inform	This strategy is aimed at keeping stakeholders informed of changes or modifications to ACCS strategy. The underlying assumption is that stakeholder interest is enhance by their increased understanding of ACCS' strategy and approach to implementation. Good information also helps manage expectations and reduce conflicts as a result of misunderstanding.

3.2. Building Trust

Building trust between ACCS and its stakeholders will require valuing different viewpoints and opinions including the objective, unbiased consideration and regard for the rights, values and beliefs of all stakeholders by ACCS. Trust is earned over time. As stakeholders interact with ACCS and gather more information on its work, they will begin to have confidence in its ability to deliver on its mandate and strategic intent.

Developing trust requires a consistent and reliable approach being used by everyone involved in the work of ACCS right from the Commissioners to employees. Building and maintaining trust should be embedded in the job description of every member of staff of ACCS. The following elements *(see figure 4 below)* are crucial in building stakeholder trust.

Figure 4: Elements of Building Stakeholder Trust

Consistency and Predictability
- Consistent and predicatable behaviour in execution
- Plans and communication must be congruent with actions taken

Competent Performance
- Perform obligations competently
- Continuously strive to demonstrate proficiency on carrying out obligations
- Deliver on what was promised

Accurate Communication
- Open and transparent communication
- Ensure compliance with declared intentions

Concern for Others
- Sensitivity to the needs, desires and interests of stakeholders
- Act in a way that respects and protects other people

In addition to the goal of obtaining support and buy-in of stakeholders, building trust contributes to insights and knowledge that can help shape ACCS' strategies and approaches in the fight against corruption. Hard work is required in building a network of influence and achieving consensus among stakeholders to ensure that their expectations are met.

3.3. Communication

A good communication plan should cater to the specific needs of each stakeholder while keeping them committed, engaged and satisfied. Communication is a tool that should assist ACCS build its capacity to enhance stakeholder interest and influence in its work while ensuring that any fears and misconceptions regarding its work are cleared.

3.3.1 Stakeholder Communication Strategy

As a follow up on the stakeholder analysis performed earlier on, it is important that a communication strategy is developed to suit each stakeholder's needs. A communication strategy should ensure that ACCS obtains ongoing commitment and support of all stakeholders.

In order to determine the communication strategy for each individual stakeholder, the following factors need to be borne in mind:

Table 3: Factors to consider in developing a Communication Strategy

Factor	
WHO does ACCS need to communicate to?	• Identify all the stakeholders that need to be informed. These would include: donors; partner agencies; Commissioners; ACCS management and team members; Government etc.
WHY does ACCS need to communicate with stakeholders?	• Use communication as a strategy to sell ACCS and its strategic objectives to stakeholders. • Some of the reasons may be to: increase awareness; increase support; increase commitment; meet regulatory and or contractual obligations.
WHAT does ACCS need to communicate to stakeholders?	• Identify the information that need to be sent to stakeholders. • Not all stakeholders need to receive the same information. • Information could include: strategic goals and objectives; budgetary plans; progress reports; statutory audit reports; monitoring and evaluation reports etc.
HOW does ACCS want to communicate to its stakeholders?	• Different stakeholders will require different channels of communication that best suit their needs. • This could include both formal and informal communication channels: written reports, presentations; video and audio clips on ACCS website; communiques etc.

Answering the above questions is the first step in developing a communications strategy. The second step is to develop a plan on how to engage with the stakeholders using the communications strategy.

3.3.2 Communications Requirements

ACCS should determine specific communications requirements for every key stakeholder. These requirements vary from stakeholder to stakeholder. The goal is to ensure that the right communication arrives at the right time to the right stakeholder.

Communication requirements can be grouped into three categories:

• **Mandatory**: This generally includes donor project reports, compliance with legal requirements such as government audit reports and contractual requirements

such as financial reporting. These are defined by the stakeholder and usually follow strict guidelines.

- **Informational**: This is information stakeholders want to know or that they may need. This information is made available to stakeholders via newsletters, website, progress reports or general communications.
- **Marketing**: This communication is designed to build buy-in and enthusiasm for ACCS' work and its deliverables. This type of information is pushed out to the appropriate stakeholder.

A Stakeholder Communications requirements matrix *(see table 4 below)* should be used to define the communications that ACCS wants to send to its stakeholders and that the stakeholders demand from it. This matrix also helps identify the detail, format, frequency, responsibility and feedback mechanism required.

Table 4: Stakeholder Communications Requirements Matrix

Stakeholder	Scope of Interest	Level of Detail	Method	Frequency	Responsible	Feedback Mechanism
Donor	High	High	Donor specific	Monthly	Project Head/CEO	Phone call
Government	High	High	Email	Quarterly	CEO	Meetings
Partner agencies	High	Low	Presentations	Quarterly	Heads of Department	Meetings

- ➤ **Scope of interest**: ACCS determines what aspects of its work are important and of interest to each stakeholder. Not all stakeholders are interested in all aspects of ACCS' work.
- ➤ **Level of detail**: Provide only information that is relevant to the specific needs of each stakeholder. Too much information has the potential to mislead.
- ➤ **Method**: The delivery method of the communication, from face to face, to print and email. Each stakeholder has a different preference on how communication is delivered to them.
- ➤ **Frequency**: The timing of the communication to each stakeholder will also depend on the statutory or contractual requirement existing between ACCS and the stakeholder
- ➤ **Responsible**: Specific persons within ACCS should be responsible to deliver the communication to the stakeholder. Responsibility includes ensuring that the stakeholder has received the information on time and that it meets its expectations.
- ➤ **Feedback Mechanism**. The method, format and channel to receive the feedback. Feedback is important as it helps verify that the message was received and allows for an opportunity for the stakeholders to be heard and influence how communications are sent to them.

3.3.3 Communication Channels

Communication is the process of transferring information and understanding. The communication process involves six basic elements: sender (encoder), message, channel, receiver (decoder), noise, and feedback. ACCS can improve communication skills by becoming aware of these elements and how they contribute to successful communications with stakeholders.

➢ **Sender:** ACCS needs to identify the person responsible for sending the communication. It is important that this person has a level of credibility in the areas and content of the message which involves displaying knowledge on the subject, the audience, and the context in which the message is delivered. As important as it is to know the audience, it is also important to know their level of knowledge related to the purposes of the message. Failure to understand the audience will result in delivering messages that are misunderstood.

➢ **Message:** Written, oral and nonverbal communications are affected by the sender's tone, organization of the message, the bias towards the receiver, the extent of the content in the message, and by the style of communicating. All messages have intellectual and emotional components. ACCS needs to understand these factors and have the ability to use reason and emotion to present motivational appeals that ultimately help change minds and actions.

➢ **Channel:** Messages are conveyed through channels including verbal face-to-face meetings, telephone and videoconferencing, and written such as letters, emails, memos, and reports. Different channels have different strengths and weaknesses. ACCS must identify the type of channels it intends to use based on the type of message and type of stakeholder.

➢ **Noise:** This refers to disruptions in communication that influence the interpretation of the message by the receivers. Communication noise can have a profound impact in the interactions with stakeholders causing disruptions that impede clear communications. For instance, interruptions caused by the technology used to send the message.

➢ **Receiver:** Are the stakeholders or audience of the communication. ACCS should have a good understanding of the fact that each stakeholder goes into the communication process with ideas and feelings that will influence their understanding of the intended message and its response. To be a successful communicator, ACCS needs to consider these factors before delivering any message.

➢ **Feedback:** The communication audience provides feedback, either in verbal or nonverbal reactions to the message which are crucial to ensuring the audience understood the message and its implications.

3.3.4 Communication Calendar

An important tool to help manage communications is the development of a communications calendar to help remind everyone about important dates when specific pieces of information need to be communicated to various stakeholders.

This schedule is handy especially for mandatory or regulatory communications that ACCS must send.

Table 5: Communications Calendar

Stakeholder	Nature of Communication	Date
Auditor General	Financial Statements	31st January
Commission	Annual Report	31st March
Ministry of Finance	Annual Budget	30th April
ACCS	Financial Statement	30th June

3.3.5 Communication Principles

It is good practice that ACCS defines the communications principles that will guide all communication efforts involving stakeholders. The Principles are the values and norms that govern the behaviour of the people in charge of developing the communication messages. The principles should be rooted in ACCS' values, vision and mission statements. The communication principles include:

➢ **Credibility:** without a credible communication approach or credible communicators, stakeholders will simply not believe in the message.

➢ **Manage expectations:** ACCS should encourage stakeholders to believe in the message they put out by showing an understanding of their needs.

➢ **Information Overload:** too much information leads to confusion and may keep stakeholders from paying attention to the communication messages.

➢ **Respect:** every stakeholder deserves respect, the communication messages should take in consideration that the message does not contain elements of gender, race, religion, social, political context that will offend the stakeholder.

➢ **Clarity:** Messages need to be simple and to the point, avoiding the use of technical jargon that leads to confusion and misunderstandings.

CHAPTER 4: STAKEHOLDER EVALUATION

Stakeholder relationships are activities that need to be monitored and evaluated for their effectiveness. With time, the initial conditions by which the stakeholder strategy was decided, will have changed. It is therefore important to constantly monitor and evaluate stakeholder relationships. It is especially important when the interest of a high influence stakeholder starts to change from positive to negative. This new analysis can help make the required changes in the strategies to build trust and relationships with the stakeholder. ACCS has to decide how often the stakeholder analysis needs to be evaluated and revised. This may include the need to have conversations, interviews and meetings with stakeholders to assess their level of interest in and support for the work of ACCS.

4.1. Stakeholder Trust

First review the actions that have been taken to build trust and evaluate these actions against the perceived increase or decrease in trust. Common signals may include stakeholders spending more time on ACCS activities and participating more in decision making. Considerable efforts need to be put in to meet personally with key stakeholders and build a good understating of where they stand with the organisation. By offering open communications and a preposition to listen, stakeholders can provide valuable feedback that can help identify areas that need improvement and that will help increase their support and interest in the work of ACCS.

4.2. Stakeholder Support

Changes in stakeholder support should be evaluated by analysing whether the strategies to build trust have indeed worked and the stakeholder has changed their initial perceptions, fears or misconceptions. ACCS should monitor how the stakeholder changes in the way it communicates back and identify what actions have led to a positive change. This information can help validate or change the initial assumptions about the strategies needed to build support.

4.3. Stakeholder Influence

ACCS' main interest should be to ensure that key stakeholders with a large influence maintain their commitment and use their influence in a positive manner. Care needs to be taken in the event that a stakeholder with large influence changes its mind and uses its power to influence negatively other stakeholders.

CHAPTER 5: STAKEHOLDER MANAGEMENT IMPROVEMENT

Monitoring the stakeholder's level of interest and influence helps develop opportunities to improve the strategies to build partnerships, trust, and support. However, the amount of time ACCS allocates to stakeholder management depends on the size and difficulty involved in the implementation of its objectives, goals, and the amount of help needed to achieve the expected results. ACCS needs to consider the amount of time needed to manage stakeholder relationships and communications. Additional resources to help on this estimation could include the organization's management team, other stakeholders, and expert advice. When deciding the areas that need to be improved ACCS needs to review the original ideas of what the organisation needs from each stakeholder as contained in the stakeholder matrix.

5.1.   Improving Relationships

ACCS needs to think about what is needed to keep key stakeholders engaged and committed, define how to win over or neutralize the opposition of stakeholders that are either non-supportive or sceptical about its organisational objectives, and think about how to engage them and raise their level of interest. A first step is to develop ideas of what is needed to win and manage the support of these stakeholders. With the time and resources available, ACCS should identify mechanisms of managing communications and receiving input from stakeholders. Finally, ACCS needs to consider the impact on stakeholder of its interventions and, where appropriate, let stakeholders know as early as possible of any difficulties that may arise, and discuss ways to minimize or manage any potential negative impact.

5.2.   Improving communication

ACCS needs to review and modify the messages utilized to persuade the stakeholders to support and engage with it. Carefully crafting the right message will show the benefits of what ACCS is doing and this will likely increase stakeholder participation and support. The organisation should focus on the high-influence/high-interest stakeholders first and the low-interest/low-influence stakeholders last by devising a practical plan that entails effective communications with stakeholders involving the right amount of information, so that there is neither under, nor over-communication.

An effective communications plan is an essential component in the strategy to build and maintain relationships and is a requirement for maintaining the support and commitment from all stakeholders. The success of ACCS should be closely linked to its strong relationships developed through the use of effective, consistent, and relevant communications with all stakeholders. ACCS needs to evaluate if the vehicles chosen to transmit the communications are still valid and relevant.

Maintaining good relationships is also about maintaining good communications and calibrating the communications strategy to adapt to the changes in ACCS and the

stakeholder environment. ACCS should review each approach, method, format, frequency, scope of content and ask stakeholders for feedback on the appropriateness, usefulness, relevance and timeliness of each. Feedback can provide valuable insight as to what is needed to improve the effectiveness of communication.

6.1.   Appendix 1: ACCS Stakeholder Management Policy

ANTI-CORRUPTION COMMISSION
SEYCHELLES

Stakeholder Management Policy

Approved by the Commission, August 2019

1. Introduction and Applicability

This Stakeholder Management Policy is to guide ACCS's approach to communicating and working with stakeholders. It is an integral part of developing an understanding of ACCS's stakeholder's needs, interests and expectations and assist ACCS with strategic and sustainable decision-making. While ultimate responsibility with stakeholder engagement rests with the Commissioners, ACCS' management and staff are mandated to maintain inclusive, mutually beneficial relationships with stakeholders and be proactive in engaging with them in a transparent manner.

2. Scope

This policy outlines ACCS overarching approach to the stakeholder management process engagement with stakeholders. It is aimed at ensuring that stakeholder engagement is applied consistently across all operations.

This policy:

a) Sets out principles for management and engagement with all stakeholders.
b) Forms part of ACCS' operating philosophy, policies, standards and values.
c) Applies across all ACCS operations and departments regarding all activities and interactions with stakeholders.
d) Is to be monitored on a regular basis to ensure consistency is applied and stakeholder interests are met.
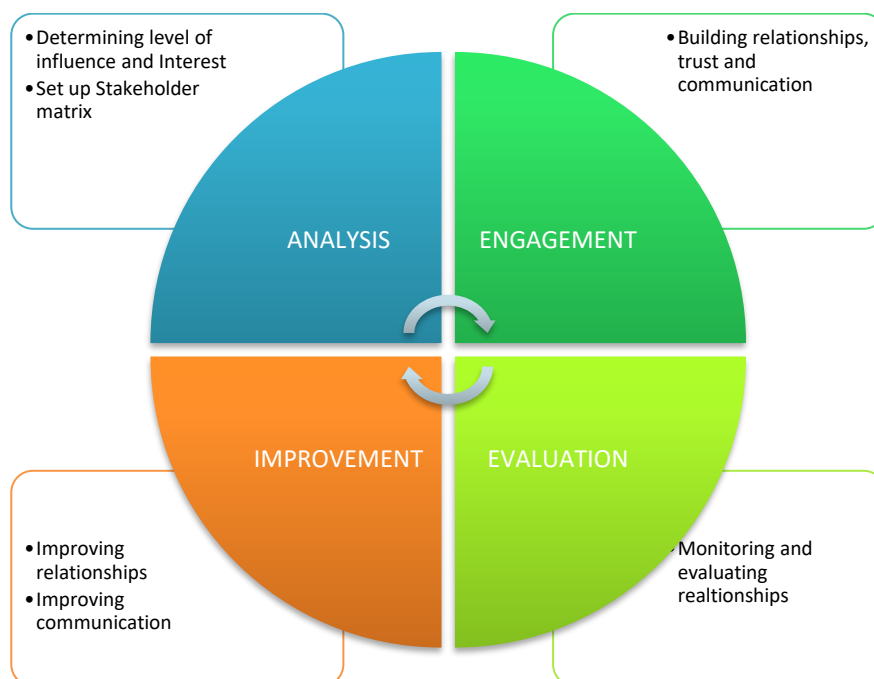e) Is to be updated/revised, as and when required, to enhance the process of stakeholder management at ACCS.

3. Purpose

The purpose of the policy is:

a) to outline a method of engagement with stakeholders;
b) to guide the building and the maintaining of a transparent relationship between ACCS and our stakeholders;
c) to develop and promote a good understanding of our stakeholder needs, interest and expectations;
d) to outline guidelines on how ACCS should engage with our stakeholders; and
e) to re-inforce ACCS's commitment to all stakeholders.

4. Stakeholder Management Process

Our stakeholder management process is continuous and involves the following elements as demonstrated in the graphic below:

- Determining level of influence and Interest
- Set up Stakeholder matrix

ANALYSIS

ENGAGEMENT
- Building relationships, trust and communication

IMPROVEMENT
- Improving relationships
- Improving communication

EVALUATION
- Monitoring and evaluating realtionships

5. Stakeholder Identification

Stakeholders are those individuals, groups or organisations that impact and or could be impacted by our activities. We identify our stakeholders and monitor our relationships through a number of communication channels including regular dialogue. Stakeholder interests and influence levels are ascertained and prioritised based on carefully considered analysis of their interaction with us. We identify both internal and external stakeholders. Our primary key stakeholders include: ACCS staff;

Government MDA's; Attorney General; Judiciary; Ethics Commission; the National Assembly; the Private Sector; Civil Society, NGO, CEPS; Development partners; the Media; Regional and International institutions.

6. Stakeholder Engagement Principles

a) Congruence:

We aim at putting out a consistent and truthful message.

b) Consultative:

We aim to develop relationships where stakeholder views are considered in decision-making and we provide various channels to ensure this.

c) Collaborative:

We aim to establish deep partnerships with stakeholders with aligned values and work closely with selected partners and interested stakeholders to enable us fulfil our mandate and execute or strategic objectives.

d) Communicative:

We are committed to an honest, open and ongoing communication with all identified stakeholders.

e) Commitment:

We are committed to fulfilling our mandate, as established by law, to fight corruption in Seychelles. We aim to leverage effective stakeholder engagement to help with achieving this.

f) Responsive:

We strive to continuously improve and proactively respond to the changing environment, stakeholder need, interests and expectations.

7. Stakeholder Engagement Approach

These three basic approaches are to be utilised in building stakeholder relationships:

Approach	
Consult	This strategy is aimed at building and maintaining support. Consult with stakeholders to actively seek their opinions and input for key decisions. While this may not necessitate ACCS changing or modifying its overall strategy, it might influence its operational approaches to maintain higher levels of commitment.
Involve	This strategy is aimed at involving stakeholders in the planning and implementation of ACCS strategy. Stakeholders are more likely to provide support to ACCS if they are involved. ACCS should partner with them to increase their engagement and commitment and at

Approach	
	the same time tailor its strategic approach to win their support. Involvement helps build ownership and buy-in.
Inform	This strategy is aimed at keeping stakeholders will informed of changes or modifications to ACCS strategy. The underlying assumption is that stakeholder interest is enhance by their increased understanding of ACCS' strategy and approach to implementation. Good information also helps manage expectations and reduce conflicts as a result of misunderstanding.

8. Roles and Responsibilities

Roles and responsibilities for Resource Mobilisation are aligned with the mandated Governance and Management structure of ACCS as prescribed by law and as will be assigned and determined on a project by project basis from time to time. These include:

Category	Roles and Responsibilities
The Commission	The Commission provides the overall oversight and governance for stakeholder management and engagement process.
CEO and the Management Team	The CEO and Management provide the executive decision-making on stakeholder management including the identification, analysis and engagement of stakeholders as well as the evaluation and improvement of the stakeholder management process.
All Employees	All employees play a key role in supporting and implementing agreed upon procedures of the stakeholder management process and effecting a successful stakeholder engagement experience for all stakeholders. This has to be under the guidance of the CEO and Management team.

6.2. Appendix 2: Internal and External Stakeholder Analyses

Table 1: External Stakeholder Analysis

Stakeholder	Stakeholder activities	ACCS activities
Government Ministries, Departments and Agencies (MDAs)	• Collaborate, network and partner with ACCS • Enhance governance systems and reforms • Support policy development in the fight against corruption	• Collaborate, network and partner with stakeholders • Train and provide advisory services to public officers on integrity issues • Support development of anti-corruption policy
Attorney General (AG)	• Provision of General Legal advice • Advice on investigation and expedite prosecution of cases • Introduce and support legal reforms that enhance ACCS mandate	• Forward to AG case files on completed investigations • Propose relevant legislative reforms needed • Undertake thorough investigations and prepare quality reports and briefs
Auditor General	• Provision of audit services • Assessment of Internal Controls at ACCS	• Forward Financial reports for audit
Ombudsman	• Share relevant information regarding possible investigations • Collaborate on legislative amendments regarding corruption	• Forward case files on non-corruption complaints • Collaborate on legislative amendments regarding corruption
Ethics Commission	• Share information regarding assets and liabilities of persons under investigations	• Requests for information regarding assets and liabilities of persons under investigations
Judiciary	• Judicial expedition of corruption cases • Efficient record keeping, to avoid cases of missing files • Objectivity and firmness	• Educate and advise on integrity issues • Lobby for a special anti-corruption court • Serve the court through competent representation
Police	• Support ACCS investigations • Objectivity and firmness	• Liaise on investigations
Financial Intelligence Unit	• Share relevant information regarding possible investigations	• Liaise and collaborate on investigations
National Assembly	• Provide political support, goodwill and commitment of interest for enactment of anti-corruption legislation • Timely approval of ACCS budget • Scrutiny of ACCS Statutory reports	• Educate and train MNAs on the anti-corruption strategies • Report and account appropriately on anti-corruption initiatives • Provide information on anti-corruption strategies

Stakeholder	Stakeholder activities	ACCS activities
Private Sector	• Collaboration, network and partnerships • Support compliance with anti-corruption measures through helping to educate the public • Encourage whistle blowing • Develop and implement codes of ethics and best practices in corporate governance	• Enforce anti-corruption laws fairly across board to encourage fair competition and trade practices • Develop and enforce whistle blowing protection policies • Support development of governance instruments and build capacity of the sector to manage corruption • Conduct awareness on corruption
Civil Society, NGOs, CEPS	• Collaboration, networking and partnerships • Advocacy and public awareness creation • Whistle blowing	• Collaboration, networking and partnerships • Training and education on integrity issues particularly community involvement and oversight • Conduct awareness on corruption
Development Partners	• Experience sharing • Financial and technical support • Collaboration, networking and partnership	• Facilitate collaboration, networking and partnerships • Feedback reports and accountability of funds
Media	• Promote and educate the public on the fight against corruption • Dissemination of information • Encourage whistle blowing • Undertake investigative journalism	• Collaborate, network and Partnership • Enlist them in the fight against corruption • Provide periodic updates • Use information from media and act on reported cases
Regional and international Institutions	• Collaborate, networking and partnerships • Provide technical and financial support on governance issues • Assist in tracing and asset recovery	• Sharing experiences • Facilitate collaboration, networking and partnerships • Reciprocity on investigation and recovery of assets with cross border and regional angle
Professional bodies	• Propagate anti-corruption messages to their members • Enforce compliance of code of ethics • Mainstream anti-corruption, good governance and ethics in their programmes	• Training on integrity issues • Support the development of governance instruments • Partnerships, collaborations and networking

Table 2: Internal Stakeholder Analysis

HUMAN RESOURCE & ADMINISTRATION UNIT		
Units	**What the HR&A Unit can do for the other Units**	**What the other Units can do for the HR&A Unit**
• **Education & Prevention** • **Complaints & Communications** • **Investigations & Research**	• Provide adequate support services across the board • Review human resource policies, procedures and practices • Facilitate a review of organizational structure and terms and conditions of service • Support prevention and investigation of corruption • Support investigation and asset tracing	• Submission of timely and accurate information and reports • Provide legal advice on legal expenditure of funds of the Commission • Submit reports and works on their engagements • Provide recommendations on service delivery
EDUCATION AND PREVENTION UNIT		
Units	**What the E&P Unit can do for the other Units**	**What the other Units can do for the E&P Unit**
• **Human Resource & Administration** • **Complaints & Communications** • **Investigations & Research**	• Provide timely information • Develop anti-corruption literature and technical knowledge and training protocols on processing complaints • Support investigations	• Services in form of legal advice, research, systems review and education • Support preventive services • Support and collaborate in implementation of prevention and disruption of corrupt activities • Provide feedback from investigated complaints
COMPLAINTS AND COMMUNICATIONS UNIT		
Units	**What the C&C Unit can do for the other units**	**What the other units can do for the C&C Unit**
• **Human Resource & Administration** • **Education & Prevention** • **Investigations & Research**	• Process complaints from the public and pass them on to relevant units • Provide support in intelligence gathering • Provide timely and relevant information on investigations • Develop data capture and management	• Give information on corruption • Act on processed complaints on corruption • Train staff on intelligence gathering and information processing • Provide technical advice assistance in specific areas • Provide legal advice
INVESTIGATION AND RESEARCH UNIT		
Units	**What the I&R Unit can do for the other units**	**What the other units can do for the I&R Unit**
• **Human Resource & Administration** • **Education & Prevention** • **Complaints & Communications**	• Provide information to the Public Relations Officer • Offer support and collaboration • Support preventive services • Investigate received and processed complaints	• Support investigative and research activities • Disseminate information on anti-corruption preventive measures • Implement preventive service • Provide processed

			complaints from the public
		29	• Communicate results of investigations to interested parties

6.3. Disclaimer

This handbook is for general guidance only. It does not include all possible situations and it cannot substitute the law or take the place of legal advice. The ACCS will not bear any responsibility for any legal damages arising from action or absence of action of any person on account of the contents of this handbook.