



OFFICE OF THE INTEGRITY COMMISSION

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Ms. Sandra Ferguson
Social Activist
ST. GEORGE'S

BY EMAIL

November 24, 2020

Dear Ms. Ferguson,

The Office of the Integrity Commission has received and subsequently seen and read in local online newspapers, a letter written by you on November 7, 2020, addressed and delivered by email to the Commission on November 9, 2020 and for which receipt was acknowledged on November 10, 2020. You acknowledged our response with thanks on November 11, 2020.

In responding, the Commission will address, some of the concerns listed in your letter of November 7, 2020.

1. 2020 Virtual Centre For Excellence Series - The Commission duly notes your sharing.

2. Conflict of Interest and Code of Conduct

- a. *"How is it that a former member of the Integrity Commission could have been the **auditor of the state enterprise, Marketing and National Importing Board**, which found itself at the centre of investigations ordered by the then Minister of Finance?"*

Guided by the Organization for Economic Corporation and Development (OECD) Guidelines on Managing Conflict of Interest in the Public Service, the Commission domesticated its own policy. Additionally, a legal opinion was

sought in May 2014 from Dr. Francis Alexis QC on the meaning of Conflict of Interest as stated in the Integrity in Public Life Act No 24 of 2013. The Policy states–

"The Commissioner must abstain from participation in any discussion on the matter, shall not attempt to personally influence the outcome, shall refrain from voting on the matter and, unless otherwise decided by the Commissioners, must leave the meeting room for the duration of any such discussion and vote."

The principle of the policy is also exercised by our staff. On occasion both have recused themselves from discussions on issues that would be considered "conflict of interest" both real and perceived.

In keeping with our policy, when this matter arose, the Commissioner referred to in your letter, disclosed to his fellow Commissioners on August 7, 2018, the fact that his company was contracted to audit the MNIB and in that regard, recused himself from ALL matters related to the investigation of the MNIB. This information was publicly shared during a press briefing on September 12th, 2018.

- b. *"How is it that a former Senator and (therefore a law maker) could have been simultaneously a law maker, a member of the Citizenship by Investment Committee reviewing applications and making recommendations and a local agent of the citizenship **by investment programme?**"*

Our understanding is that the (former) Senator resigned from the CBI during the first quarter of 2016 and eventually ceased to be a Member of the Senate. The former Senator remains a local agent with the Citizenship by Investment Programme.

3. Letter of June 12, 2020 to IC re Conflict of Interests

As indicated in our follow up letter to you, dated September 21, 2020, the Commission advised that its Technical Team had begun and is continuing its own inquiries into matters raised in your communication. We have and

continue to share, personal feedback to persons making inquiries. Once our inquiries are completed, we will share with you in-camera on the outcomes.

3.1 In the matter on the relationship between the Integrity Commission and Grenada's Ambassadors

The Commission is not responsible for nor does it have any say in the appointment of Ambassadors. Where there is any appearance of conflicts of interest in such appointments, the Commission can only act within the legislation by which it is bound.

3.1.1 – Eastern Caribbean Block Chain Association

We are in the process of verifying the exact status of this entity. If it is a representative of the Eastern Caribbean Central Bank (ECCB), then it's for the ECCB's regulatory and legal arm to address its operations.

We acknowledge your commitment to bringing to the fore, alleged instances of corruption and corrupt practices. As you will appreciate, the proper conduct of inquiries takes time. The Commission proceeds methodically and meticulously, to ensure accuracy, and the legality of its research, findings, analyses and appropriate recommendations. We are also impacted by the current COVID 19 Protocols.

We are aware that Grenada like other countries of the world, is not free of corruption, but through our work and the encouragement of stakeholders, we are committed to fighting corruption, building integrity and fostering a culture of transparency and accountability among public officials in the State of Grenada.

Sincerely,



Anande Lady Trotman-Joseph
CHAIRPERSON