



**35th** ANNUAL REPORT  
to Parliament for the Year 2022

**BUILDING ON A TRANSFORMED  
ORGANISATION**



The logo is a three-bar symbol, representing three areas of human society in which integrity is fundamental:

SELF, COMMUNITY, CIVILIZATION.



**The  
Integrity  
Commission**  
OF TRINIDAD AND TOBAGO

March 27, 2023

Mrs. Jacqui Sampson- Meiguel  
Clerk of the House  
Parliament of Trinidad and Tobago  
The Red House  
Parliamentary Complex  
Cabildo Building  
St. Vincent Street  
Port of Spain

Dear Madam,

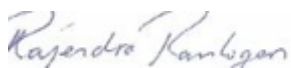
**Thirty-Fifth Annual Report to Parliament for the Year 2022**

The Integrity Commission of Trinidad and Tobago respectfully submits its Thirty-Fifth Annual Report to Parliament on its activities for the year ended December 31, 2022. The Report is prepared in compliance with Section 10 of the Integrity in Public Life Act, Chapter 22:01 ("the IPLA"), which states:

"The Commission shall, not later than 31st March in each year, make a report to Parliament of its activities in the preceding year, and the report shall be tabled in the Senate and the House of Representatives not later than 31st May, so, however, that the reports shall not disclose particulars of any declaration filed with the Commission."

Kindly note that we have also submitted this Report in electronic form, as requested, to the following address: [coth@ttparliament.org](mailto:coth@ttparliament.org)

Yours faithfully,



.....  
Prof. Rajendra Ramlogan BA Eng.Lit. (UWI)  
LLB (UWI), LEC (HWLS), LLM (NYU School of Law)  
PhD (Cantab.) FRCS  
Chairman

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# CHAIRMAN'S REPORT

**Prof. Rajendra Ramlogan**  
**Chairman**  
**Integrity Commission of Trinidad and Tobago**

**“To confront criminals, we need to end corruption. If we don’t do this, there is no hope” – Mexican President Andres Manuel Lopez Obrador.**

The 17th Integrity Commission, in its first year of office beginning early 2021, confronted numerous challenges in its effort to reform the institution and regain public trust in its execution of its statutory mandate so as to ensure integrity in public life. As eloquently noted by one of the greatest statesmen in modern human history, “Change does not roll in on the wheels of inevitability, but comes through continuous struggle.” - Martin Luther King Jr. It was hardly surprising that the attempt to ensure performance and the efficient and effective allocation of human capital led to a vitriolic response from some who were challenged to join the transformative effort to render the Integrity Commission an institution that contributed positively to nation building. However, by the end of 2021, a new dawn was appearing.

A young team of executive management led by our acting Registrar, Ms Isha George, and comprising our Unit Administrators, Ms Jessi Geoffroy and Ms Vanna Gobin, were instrumental in taking the work of the Integrity Commission to another level. Fearless and independent, they epitomised the cry of the Prime Minister, the Honourable Dr Keith Rowley, for persons in public service to adopt a “can do” attitude (February 01, 2022). This executive management team, in turn, has inspired their colleagues to adopt a mantra of performance and accountability for delivering on the statutory mandate of the Integrity Commission. Undoubtedly, although the nation is growing increasingly despondent about the state of crime with its spiralling murder rate, we cannot lose sight of the crime of corruption, which can eviscerate our economy and, ultimately, our social well-being. Citizens of Trinidad and Tobago have grown accustomed to swirling allegations of corruption at all levels of society. To participate in the simplest public service offerings, bribes have become commonplace.

*“The law provides criminal penalties for corruption by officials, but the government did not enforce the law effectively, and officials sometimes engaged in corrupt practices with impunity. There were credible reports of police and government corruption during the year. Corruption was a problem at many levels of government. Opaque public procurement processes were a concern. Statutes governing conflicts of interest were rarely enforced, making nepotism and corruption commonplace.” – 2021 Country Reports on Human Rights Practices: Trinidad and Tobago - US Department of State.*

In pursuing good governance and integrity in public life, we repeatedly do the same thing yet expect a different result. We hope for a bumper yield in governance and integrity, but we are reluctant to do things differently. As a taxpayer-funded institution, the Integrity Commission must demonstrate vigorous regard for its statutory mandates and be ready to work with a complete understanding of the adverse impact of corruption on our present and future. The Integrity Commission cannot bury its head in the sand and pretend that there can be no accountability to the people it is intended to protect from failings in good governance and the absence of integrity in public life. As a nation, we must ensure that there is integrity in public life. The lack of integrity in governance can only serve to amputate our very souls.

*“When you see that trading is done, not by consent, but by compulsion - when you see that in order to produce, you need to obtain permission from men who produce nothing - when you see that money is flowing to those who deal, not in goods, but in favors - when you see that men get richer by graft and by pull than by work, and your laws don't protect you against them, but protect them against you - when you see corruption being rewarded and honesty becoming a self-sacrifice - you may know that your society is doomed”. (Ayn Rand)*

## THE COMMISSION

The Commission is a constitutional body created by Sections 138 and 139 of the Republic of Trinidad and Tobago Constitution and established by Section 4 of the IPLA. Section 4 also provides for the membership of the Commission, that is to say, a Chairman, a Deputy Chairman and three (3) other members. All Commission Members must be persons of integrity and high standing; at least one (1) member must be an Attorney-at-law with at least ten (10) years' experience. Another must be a chartered or certified accountant.



*(L-R) Mr Lyndon James, Member; Ms Sandra Honore, Professor Rajendra Ramlogan, Chairman; Ms Eleanor Bridgeman-Volney, Member; and Mr Frederick Gilkes, Deputy Chairman.*

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# THE INTEGRITY COMMISSION

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## VISION STATEMENT

The Integrity Commission of Trinidad and Tobago is the premier state institution for the promotion and preservation of integrity in all affairs to make Trinidad and Tobago a corruption free society.

## MISSION STATEMENT

The Integrity Commission of Trinidad and Tobago and its team of dedicated professionals promote and facilitate the highest ethical standards by:

- ensuring compliance with the Act;
- detecting and eradicating corrupt practices and dishonest conduct;
- educating the public in an effort to eradicate corruption, improve governance and engender a national culture of integrity; and
- providing excellent customer service.

## OUR VALUES

Confidentiality, Integrity, Professionalism, Teamwork

## OBJECTIVES

The aims and objectives of the Commission can be succinctly described as:

- making of new provisions for the prevention of corruption of persons in public life by requiring public disclosure;
- regulating the conduct of persons exercising public functions; and
- preserving and promoting the integrity of public officials and institutions.

## POWERS AND FUNCTIONS OF THE INTEGRITY COMMISSION

The Commission shall carry out those functions and exercise the powers specified in the Act.

Among other things, the Commission:

- shall not be subject to the direction or control of any other person or authority;
- may in all cases where it considers it appropriate to do so, make use of the services or draw upon the expertise of any law enforcement agency or the Public Service;
- may for specific projects or investigations enter into contracts for the services of persons having technical or specific knowledge of any matter relating to the work of the Commission; and
- shall have the power to authorize investigations, summon witnesses, require the production of any reports, documents, other relevant information, and to do all such things as it considers necessary or expedient for the purpose of carrying out its functions.



## **CORRUPTION AND THE STATE OF THE COUNTRY**

The Corruption Perceptions Index of 2022 ranked Trinidad and Tobago at seventy-seven (77) out of one hundred and eighty (180) countries, with its overall score being forty-two (42) out of one hundred (100). A report published by the United States on Trinidad and Tobago 2021 Human Rights underlined the corruption and lack of transparency that perhaps accounts for this underwhelming score. The report observed that the law provided criminal penalties for corruption by officials without proper enforcement of these penalties; officials therefore engaged in corruption with impunity. In addition to this, a recent survey indicated that the public does not perceive the Commission to be functioning effectively.

It should be noted, nonetheless, that various laws address the corruption of public officials in Trinidad and Tobago and include:

- The Integrity in Public Life Act Chapter 22:01
- The Prevention of Corruption Act Chapter 11:11
- The Police Complaints Authority Act Chapter 15:05

Yet, the dearth of cases with legal outcomes reflects the problem of implementing legislation. Allegations of corruption seldom gain traction through the legal system. The lack of enforcement of statutes governing conflicts of interest, joined with opaque public procurement processes, creates the perception of Trinidad and Tobago that the index suggests, and the public affirms: the prevention of corruption has been inefficacious.

## **COST OF CORRUPTION**

Trading Economics has placed our average Gross Domestic Product (GDP) between 1962 and 2019 at USD 9.11 billion, with an all-time high of USD 27.87 billion in 2008. Within that period, our total GDP has been approximately USD 500 billion.

In 2018 the Secretary General of the United Nations, in an address to the United Nations Security Council, stated that the global cost of corruption is at least five percent (5%) of the world's GDP. Applying this to Trinidad and Tobago, the loss from corruption is estimated to be around USD 25 billion.

According to the Minister of Finance, the Honourable Colm Imbert, the national debt as at February 2021 stood at TT 124.73 billion or USD 18.3 billion. Therefore, if all the monies lost to corruption were returned to the Treasury, the national debt could be repaid, with USD 7 billion still remaining.

**REPORT ON THE UNITS OF THE  
COMMISSION:**

**MEETING THE CHALLENGES**



Head of Compliance, Ms. Vanna Gobin

## COMPLIANCE

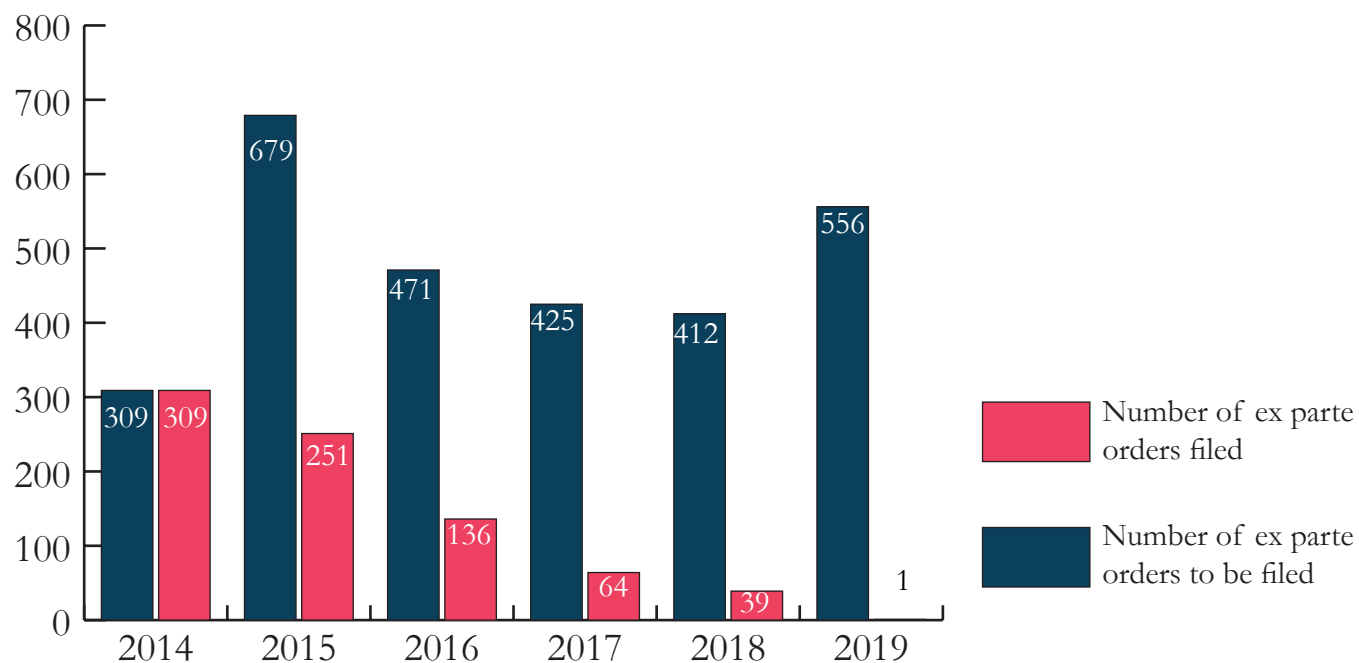
### NON-FILING OF DECLARATIONS

The 15th Commission was confronted with a critical situation pertaining to the non-filing of declarations by persons in public life. Due to institutional constraints, the 15th Commission took a decision to limit its enforcement actions to six years. Consequently, outstanding declarations for 2014 to 2019 by one thousand and sixty-six (1,066) persons in public life amounted to around 2,751 declarations.

Table Showing Outstanding Declarations from Filing Year 2014 to Filing Year 2020

2014	2015	2016	2017	2018	2019
309	679	471	425	412	556

Chart Showing Number of ex parte orders filed and ex parte orders to be filed from Filing Year 2014 to Filing Year 2020



## EXPARTE ACTIONS

The 17th Commission noted the failure to enforce ex parte orders through criminal proceedings as outlined in the IPLA. Despite the policy articulated by the 15th Commission, no specific proposal was put forward in the Budgetary Estimates for 2021 to implement the project. As such, the number of persons ignoring the Court has become preponderant.

The 2020 Annual Report indicated that only twenty-three (23) ex parte Orders were served to persons in public life who failed to file their declarations and statements of registrable interests and of these, eleven (11) persons in public life complied with the ex parte Orders.

By the end of November 2022, however, ex parte applications were filed for two thousand six hundred and eighteen (2618) outstanding Declarations of Income, Assets and Liabilities and Statements of Registrable Interests. This can be attributed to the Zero Tolerance Approach to non-filing adopted by the 17th Commission. This approach utilized the powers under the IPLA to take ex parte action against persons who did not file their Declarations of Income, Assets and Liabilities and Statements of Registrable Interests.

As of November 30, 2022, approximately one thousand, three hundred and twenty-three (1323) court orders were obtained from the High Court pursuant to ex parte applications. In this vein of efficiency, it is noted that approximately four hundred and seventy-eight (478) court orders were served on persons for non-compliance with ex parte Orders. In accordance with the Orders served, approximately four hundred and fifty-seven (457) outstanding declarations and statements of registrable interests were filed.

At the end of December 2022, ex parte actions have resulted in Orders being granted for eight hundred (800) outstanding declarations and statements of registrable interests.

**Table Showing Number of Declarations and Statements of Registrable Interests Subject to Ex Parte Actions from Filing Year 2014 to Filing Year 2020**

YEAR OF OUTSTANDING DECLARATIONS	NUMBER OF OUTSTANDING DECLARATIONS THAT HAVE BEEN SUBJECT TO EX PARTE ACTIONS
2014	331
2015	527
2016	399
2017	326
2018	313
2019	376
2020	346
<b>TOTAL</b>	2618

By the end of December 2022, the Commission has also recovered three hundred and ninety-four thousand and seven hundred dollars (\$394,700.00) in costs payable on compliance with ex parte Orders. These monies are deposited into the Consolidated Fund.

## CRIMINAL ENFORCEMENT

The Commission has also engaged with the Office of the Director of Public Prosecutions (DPP) to request assistance with a policy for the prosecution of persons who have not complied with court orders. Thirty-seven (37) files have consequently been sent to the DPP on such matters.

Section 20(5)(a) of the IPLA states that:

***“no prosecution of an offence under this Act other than an offence under section 20(5), may be instituted without the written consent of the Director of Public Prosecutions.”***

Based on the provisions of the IPLA, the Commission is heavily dependent on the Office of the Director of Public Prosecutions (DPP) to prosecute persons who have Orders that have been granted against them by virtue of ex parte proceedings.

However, there has been a significant history of difficulties in developing an appropriate co-operation mechanism with the Office of the Director of Public Prosecutions. Attempts to seek the assistance of the Office up to December 31, 2022 have not borne fruit as seen in the timeline of correspondence between the Integrity Commission and the Office of the DPP.

### ***Timeline of Correspondence between the Integrity Commission and the Office of the DPP in 2022***

September 13, 2021, and November 22, 2021: In letters, the Commission requested assistance from the Office of the DPP on the development and implementation of a policy for prosecution of matters in accordance with section 11(8) of the IPLA.

January 22, 2022: Though the Office of the DPP eventually provided advice on this date, and suggested a meeting to discuss the policy, the meeting was cancelled because of scheduling difficulties on the part of the Office of the DPP.

April 19, 2022: On this day, thirty-seven (37) matters where persons in public life subject to ex parte Court Orders failed to comply are forwarded by the Commission to the Office of the DPP.

August 30, 2022: A meeting to discuss the implementation of enforcement actions against persons in public life in breach of court orders was held, and assurance was given by the then Deputy DPP that a response from the Office of the DPP would be forthcoming on or before October 2022. No response has since been given.

November 2, 2022: A follow-up letter was sent to the Office of the DPP with reference to the implementation of enforcement actions, as discussed in the meeting in August. No response or feedback has yet been provided.

\*At the end of 2022, there has been no progress in arriving at a common position with the Office of the DPP to provide feedback or assistance to the Commission so as to ensure that the Commission fulfils its statutory duty.

*\*The Chairman of the Integrity Commission and the Director of Public Prosecutions, together with an advisor to the Office of the DPP, met on March 13, 2023 and held extensive discussions on the enforcement of ex parte orders for the filing of declarations and statements of registrable interests that have been served but not complied with. Discussions centred on moving the process forward and collaborating with the Police Service to ensure an efficient prosecutorial process. It is hoped that this meeting will lead to a positive way forward in the enforcement relationship between the Commission and the Office of the DPP. Pursuant to this meeting, a letter was dispatched to the Commissioner of Police on March 14, 2023, seeking an urgent audience to address the issue of enforcement.*

## **EXAMINATION OF DECLARATIONS**

One of the statutory duties of the Integrity Commission is to receive and examine declarations from persons in public life in order to issue Certificates of Compliance.

It is the current approach of the Commission that a person in public life submitting Declarations and Statements of Registrable Interests should have same reviewed within six (6) months of submission and not as much as seventeen (17) years as has occurred in the past.

In 2022, for the first time, the Commission tracked the number of declarations examined. As at the end of 2022, there are approximately One Thousand Four Hundred and Fifty-One (1,451) declarations and statements of registrable interests yet to be examined.

## **CERTIFICATION OF DECLARATIONS**

The Commission is also responsible for compiling and maintaining a Register of Interests which refers to the filing of Statements of Registrable Interests by persons in public life as part of the compliance function. The duty to certify declarations is mandatory as it ensures that public confidence is maintained between the Commission and persons in public life.

The most troubling feature of Compliance is the estimated 5000 outstanding declarations and statements of registrable interests (including filed and not filed) that are expected to be certified for the period of 2014 to 2021.

An audit of persons in public life filing declarations and statements of registrable interests has further revealed an unsatisfactory state of affairs, with nine hundred and fifty-three (953) declarations and statements of registrable interests for the period of 2014-2016 not having been reviewed by the Compliance Unit. This was even more troubling since ex parte proceedings are being taken against persons in public life for the said period for failing to file their declarations while the Commission itself failed to examine declarations from persons in public life filed for the said period. A special project was implemented to rectify this unfortunate state of affairs. To this end, three (3) Assistant Compliance Analysts were engaged on contract to execute this special project.

This translated into a notable improvement in the certification of declarations. Whereas the Annual Report for 2020 revealed that the Commission issued five hundred and thirty-nine (539) Certificates of Compliance for 2020, for the year 2022 up to November 30, 2022, approximately one thousand and seventy (1070) declarations and statements of registrable interests have been certified.

**Table Showing Declarations and Statements of Registrable Interests Certified**

As at December 31, 2020	At at November 30, 2022
539	1070

**ONLINE FILING**

In response to the COVID-19 pandemic, the Commission implemented an interim safe and secured online filing facility where persons can easily file their Declarations and Statements of Registrable Interests in compliance with the IPLA. This coheres with the intent by the Commission to deal with technology transformation and online filing since May 27, 2013, and the approved Strategic Plan of 2016 – 2021 which also aimed to do the same.

**PERFORMANCE PARAMETERS**

The absence of performance parameters is a factor inhibiting the maximisation of efficiency. Compliance officers were previously not obliged to conform to the expected performance standards.

The Commission has introduced a ranking system to properly establish performance parameters and ultimately justify the renewal or termination of contracts. Monthly reports are prepared, in which the performance of analysts is determined by several factors including the number of declarations reviewed, number of queries dispatched, responses processed and number of certified declarations. The analyst is graded according to these criteria on a scale ranging from 0-100, where 49 and under is considered “unsatisfactory” and 80-100 is considered “outstanding.”



*Head of Investigations, Ms Jessi Geoffroy*

## INVESTIGATIONS

### PERFORMANCE PARAMETERS AND TIMELINES

The Commission has encountered several challenges as it relates to the Investigations Unit. However, the Commission has made several changes and has further endeavoured to implement measures to remedy same.

Previously, performance parameters and timelines were not appropriately set with regard to the investigative process. This resulted in investigations with varied structures which were left incomplete, or in some instances, in a state of suspension, or which could be classified as “de facto” terminations in others.

This root problem manifested itself in various ways as follows:

- An audit revealed that the lack of proper parameters is directly related to the disappearance of five (5) files;
- A status report from the previous Investigations Unit highlighted serious performance issues, as evidenced by the existence of fifteen (15) investigations which were unresolved since 2013; and
- The surfacing of one hundred and seven (107) “cold cases” based on an audit conducted by the Investigations Unit in January 2022.

To combat these issues and transform the investigative process, the Commission has implemented a variety of solutions. Performance assessments, for instance, have been established. Personnel from the Investigations Unit are required to prepare monthly reports which detail assigned tasks. This is subsequently submitted to the Commission’s Investigations Sub Committee. In addition, status reports by investigators are to be provided at least within six (6) months of commencement of an investigation.

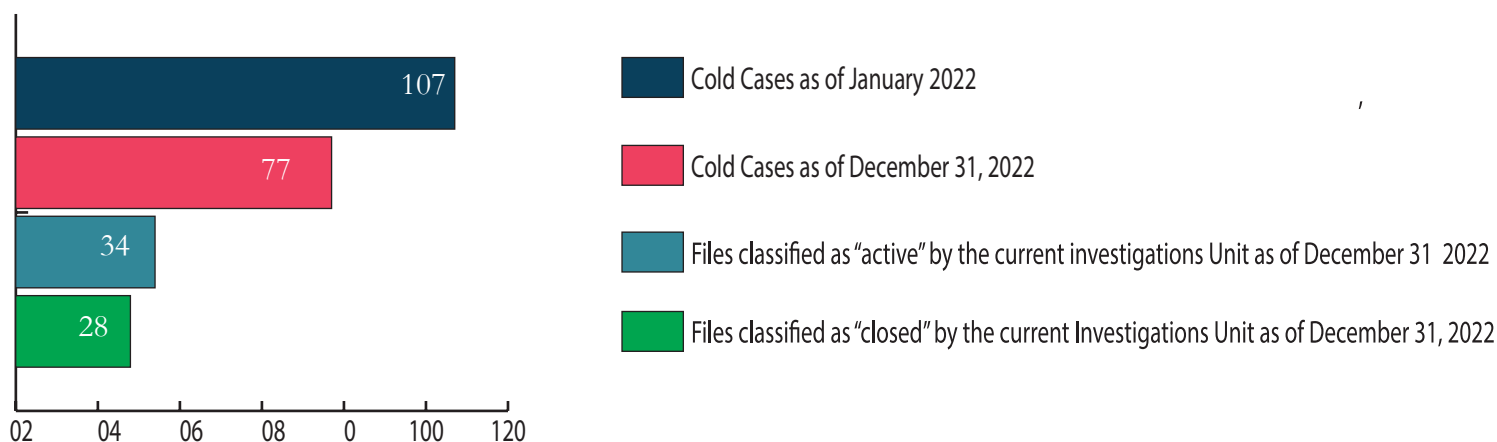
### COLD CASES

On the subject of cold cases, as of December 2022, the Commission has successfully reduced the number of cold cases from one hundred and seven (107) to seventy-seven (77). This has been done through the assignment of a Special Investigator to review all cold cases. Within a three (3) month period, the Special Investigator and two (2) Legal Officers of the Investigations Unit were able to preliminarily review all cold cases and make initial recommendations regarding all matters. Another Investigator was subsequently assigned to take action based on the initial reviews and as required, by the Head of the Investigations Unit.



Furthermore, to streamline the investigative process, the Commission has introduced a timeline system in which investigations should be concluded within an estimated time frame of six (6) months to one (1) year. The investigative process is monitored by administrative personnel who input any relevant information charting specific actions and deadlines into a database.

**Bar Graph Showing Number of Cold Cases and Files Classified as “Active” and “Closed”**



## COMPLAINTS

The originating document in many investigative matters is a complaint lodged with the Commission by a member of the public. It is therefore a crucial aspect of the investigative process.

Statute requires that complaints meet certain requirements. The statute by which the Commission is guided also allows complaints to be rejected in particular circumstances. A draft Complaint Form containing set fields was requested by the Commission, from in-house personnel, in an effort to reduce complaints-based issues. The Complaint Form was in drafting stages as of December 31, 2022. The Commission also aims to have this Form converted into Regulations in the year 2023.

The 17th Commission has been cognizant of its statutory mandate which requires that the Commission receive and investigate breaches of the IPLA and Prevention of Corruption Act, Chapter 11:11. However, the Commission has also been confronted with matters that exposed breaches in the Commission’s functions and mandate, namely, in cases where complaints have been submitted and receipts of acknowledgement dispatched but no further action has been taken with respect to the matter, in some instances, for several years.

## THE COMMISSION’S JURISDICTION

Another issue which has attracted the Commission’s attention are investigative matters which have proceeded for years only to be resolved on the grounds of lack of jurisdiction which should have been dispensed with at an earlier stage. As a result, there have been concerted efforts by the Commission, when viewing all active and new matters, to consider the issue of jurisdiction once the matter has been assigned to an Investigator. Thus, the Commission has insisted on the submission of Preliminary Assessments and Status Reports. Preliminary Assessments are required upon the receipt of complaints and specifically target jurisdiction in terms of subject

matter as well as the relevant persons exercising public functions, in accordance with the legislation.

To clarify, a person in public life means a person listed in the Schedule of the Integrity in Public Life Act Chapter 22:0:

- Members of the House of Representatives
- Ministers of Government;
- Parliamentary Secretaries;
- Members of the Tobago House of Assembly;
- Members of Municipalities;
- Members of Local Government Authorities;
- Senators;
- Members of the Boards of all Statutory Bodies and State Enterprises including those bodies in which the State has a controlling interest;
- Permanent Secretaries and Chief Technical Officers.

The more limiting aspect of jurisdiction is with respect to “Person exercising public functions”. These persons are defined under Section 2 of the IPLA, as including all persons holding office under the Public Service, Judicial and Legal Service, Police Service, Teaching Service and Statutory Authorities’ Service Commission, as well as members of the Diplomatic Service and Advisers to the Government.

Section 2 of the Statutory Authorities Act Chapter 24:01 states: “Statutory Authority” means a local authority and any commission, board, committee, council or body (whether corporate or unincorporated) established by or under an Act other than the Companies Act declared by the President under section 3 to be subject to the provisions of this Act.”

### **What does this mean for the Integrity Commission?**

With regard to a body incorporated under the Companies Act of Trinidad and Tobago, the Commission would have jurisdiction only over Members of the Board of such a State entity. The Commission would only be able to investigate and pursue action against Board Members as they would be considered as persons in public life. There would be no jurisdiction over non-Board Members (such as senior management officials). This applies to companies such as the National Gas Company of Trinidad and Tobago Limited, Heritage Petroleum Company Limited and Paria Fuel Trading Company Limited, to name a few.

The Commission has jurisdiction over members of the Board of such state enterprises that are incorporated by an Act of Parliament as being persons in public life, however, there is no jurisdiction to investigate acts, or omissions by non-Board Members (such as senior management officials) except where such state enterprise is incorporated by an Act of Parliament and has been declared by the President as being subject to the Statutory Authorities Act. Where a state enterprise has been incorporated by an Act of Parliament and not declared under the Statutory Authorities Act by the President, a breach of the IPLA cannot be made out against non-Board Members and action can only be taken if a case can be extended against the Members of the Board of the State Enterprise. Examples of these statutory authorities are WASA and TTEC.

The Commission has jurisdiction over persons holding office under the Statutory Authorities as established by an Act of Parliament and as declared as such by the President. These entities include:

- The National Housing Authority
- The Sugar Industry Labour Welfare Fund Committee
- The Cocoa and Coffee Industry Board
- The Sugar Industry Control Board
- The Agricultural Society of Trinidad and Tobago
- The Zoological Society of Trinidad and Tobago
- The Management Development Centre
- The National Lotteries Control Board
- The Public Library of Trinidad
- The San Fernando Carnegie Free Library
- St. Michael's School for Boys
- St. Dominic's Children's Home
- St. Mary's Children's Home
- St. Jude's School for Girls
- Point Fortin Corporation.

It should be emphasized that though a person against whom a complaint is made is a person in public life or a person exercising public functions, the Commission would only have jurisdiction in respect of a specific range of conduct as follows:

- breaches of the IPLA;
- breaches of the Prevention of Corruption Act Chapter 11:11 ("the PCA"); and/or
- corrupt or dishonest conduct (this can include offences such as misconduct in public office and fraud).

## **COLLECTION OF EVIDENCE**

Both cold cases as well as active cases, which have been passed onto the current Unit, have been found to be deficient with respect to the collection of evidence particularly as it relates to interviews. The Commission has therefore requested and accepted a draft policy whereby interviewers must ensure that they transcribe and sign interview transcripts and request that interviewees also sign such documents.

## **USING ALL AVAILABLE TOOLS TO OBTAIN EVIDENCE AND EXPEDITE INVESTIGATIONS**

Delay has posed a challenge to certain matters which were opened almost or over a decade ago, which the Commission must now address.

In addition to its statutory mandate, the Commission has noted that the legislation by which it is governed does not expressly state delay as a ground upon which the Commission can terminate investigations. It was deduced that a contributing factor to delay, with respect to investigations, has been failure on the part of third parties to supply requisite responses as well as requests for extension of time.

The Commission has observed that there was reluctance to utilize certain statutory powers including powers to request information to expedite investigations as well as the summoning of witnesses and their examination upon oath. The Commission has utilized the power to request information to expedite one of its investigative matters. A request was also made by the Commission that Regulations be drafted, by in-house personnel, to standardize the form for the summoning of witnesses and the relevant oath as well as the corresponding procedures. Such

Regulations were in the drafting stages as at December 31, 2022. It is the aim of the Commission that the relevant forms and procedures be made into Regulations in the year 2023.

The Commission has also explored alternative routes to acquire necessary evidence and achieve higher rates of compliance. This is through an application to the High Court, which compels the non-compliant persons to comply with the Commission's request, owing to the threat of Court proceedings.

## **WIDE-RANGING SKILLSET**

An analysis of the matters submitted to the Investigations Unit revealed the need for an ensemble of highly qualified personnel who provide the Unit with a wide-ranging skillset that is indispensable to the conduct of enquiries into alleged or suspected offences. This is due to the highly specific and specialized nature of investigations which are undertaken by the Commission.

In contrast to the previous iteration of the Investigations Unit which was composed exclusively of retired police officers, the current Unit is comprised of persons with diverse skills in areas such as law, accounting and policing. The placement of legal officers, in particular, facilitated the removal of unnecessary procedures regarding the referral of matters and has therefore increased the rate of investigations. In addition, whereas the work of legal personnel and investigators was previously independent from the other, the Commission has implemented a system in which legal personnel and investigators work in conjunction, to ensure more coherent products.

## **DIGITIZATION OF OPERATIONS**

The 17th Commission values its stakeholders and seeks to be an exemplary institution that prioritizes transparency while balancing the need to adhere to its statutory obligations. The Commission has thus implemented an online tracking mechanism whereby Complainants are provided with credentials to monitor the status of their submissions. The Digital Complaint Form, which will be accessible through the Commission's website, is important to the digitization of operations, and aims to reduce the number of submissions which do not meet statutory requirements.



## ADMINISTRATION

*Members of the Administration Unit*

### BUDGETARY CONSTRAINTS

The Commission faces a financial stranglehold, owing to the deficient and significantly depleted budget, which suffocates the efforts of the Commission to perform its statutory duties. The drastic depletion of the budget can be observed by comparing Twenty-Six Million Dollars (\$26,000,000.00) allocated to the Commission in 2015 with the figure of eight point six (8.6) million (\$8,600,000) allocated in 2023. Though the Commission received a small bump from eight (8) million \$ in 2022 to eight point six million \$ (8.6) in 2023, the latter and most recent figure is woefully short of what is required to ensure the implementation of the Commission’s mandates.

The projected budgetary allocation for staffing between 2022 and 2023 is estimated to be Four Million, Three Hundred and Twelve Thousand and Eight Hundred Dollars (\$4,312,800.00). At present there are several open positions in the Commission which cannot be filled due to lack of funding. This has severely affected the progress of the Investigations Unit in particular. The Unit has a total of forty-four (44) active investigations dating back to 2013 and has only closed ten (10) as at December 2022 as more human resource is needed to bring closure to matters at hand. The Solicitor General affirmed that the Commission must be provided with the staff it requires to discharge its functions, in accordance with Section 9 (2) of the IPLA which states: ***“The Commission shall be provided with adequate staff for the prompt and efficient discharge of its functions under the Act.”***

Despite what the Act clearly states, the Commission has been provided with a restricted budget that cannot carry the Commission to meet its staffing expenses for the year 2023 and beyond. The Commission predicts that the failure of granting additional funding will lead to the end of contract employment for several staff members as the Commission will not be in a position to remunerate persons. The Commission has slashed costs in every conceivable area. The Commission from 2021 has decided to provide its own refreshments for meetings. The Commission has not engaged in foreign travel since 2021. It must be emphasized that the Commission procured the pro bono services of a doctoral candidate from the University of the West Indies, Mr. Wilson Henderson, to prepare the much needed Strategic Plan. Training has been sought at no cost to the Commission from the Federal Bureau of Investigations. The Commission has embraced greater competitiveness in the acquisition of services so as to save costs. But there are now very few areas where costs can be cut.

Furthermore, additional fees are required to employ Process Servers to serve ex parte actions to offending persons. Given the current funds allocated to expenditure, which is a mere Forty-Five Thousand Dollars (\$45,000), the Commission is incapable of serving the documents. This, in turn, thwarts the statutory functions of the Commission. Failure to carry out the ex parte project equates to the neglect of duties imposed upon

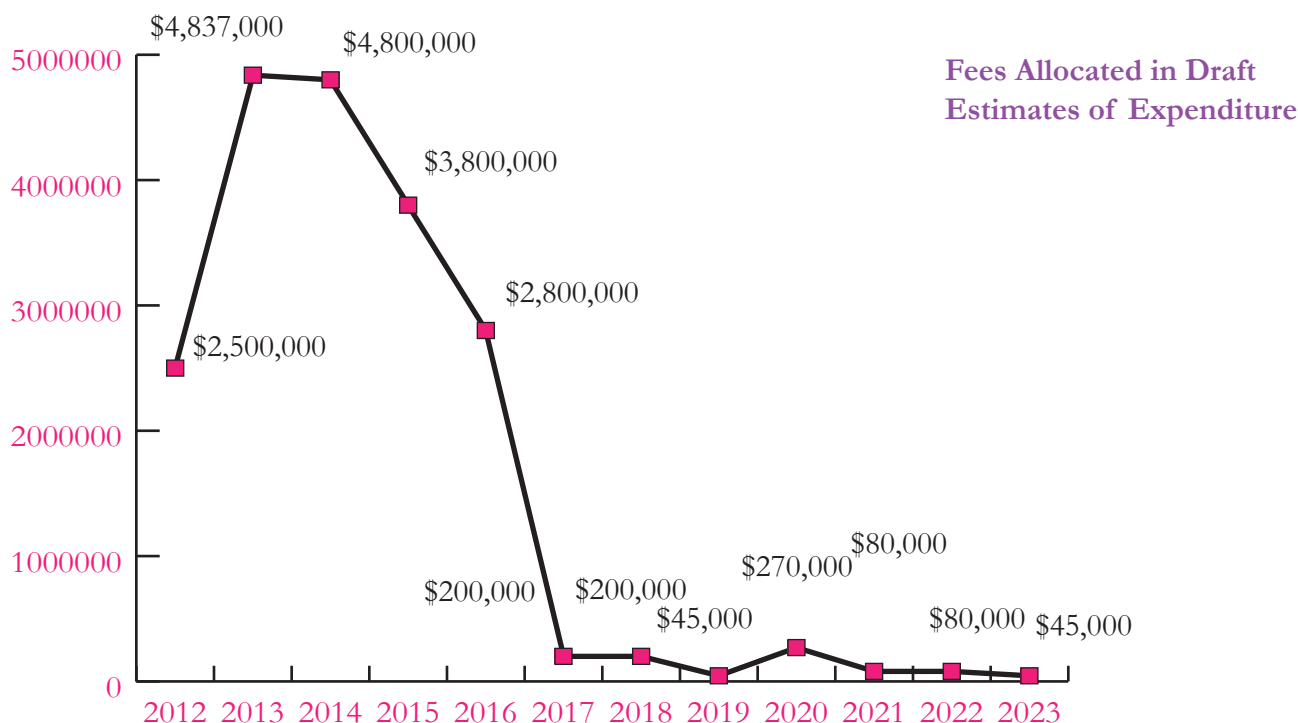
the Commission by Section 11(7) of the ILPA and also allows persons to violate the legislation by continuing noncompliance. It should be noted that the Commission abandoned the previous practice of choosing Process Servers by select invitation and opted for a competitive system of selection. This resulted in document service fees of Two Hundred (\$200.00) for anywhere in Trinidad and Three Hundred (\$300.00) for Tobago, per document served. This can be contrasted with the pre-2021 document service fees of Three Hundred Dollars (300.00) to Five Hundred Dollars (\$500.00) for Trinidad and Six Hundred Dollars (\$600.00) for Tobago.

Another example that signals the arrested development that the Commission must contend with are the legal fees necessary to ensure that decisions are supported by proper legal guidance. Investigations inevitably centre on those who occupy positions of power. These are persons who have resources at their disposal such as Senior Counsel to in responding to these investigations. The Commission, to properly perform its duties, must supplement its in-house legal advice with that of Senior Counsel advice in cases where there are complex questions of law. Pursuant to Section 40 of the IPLA:

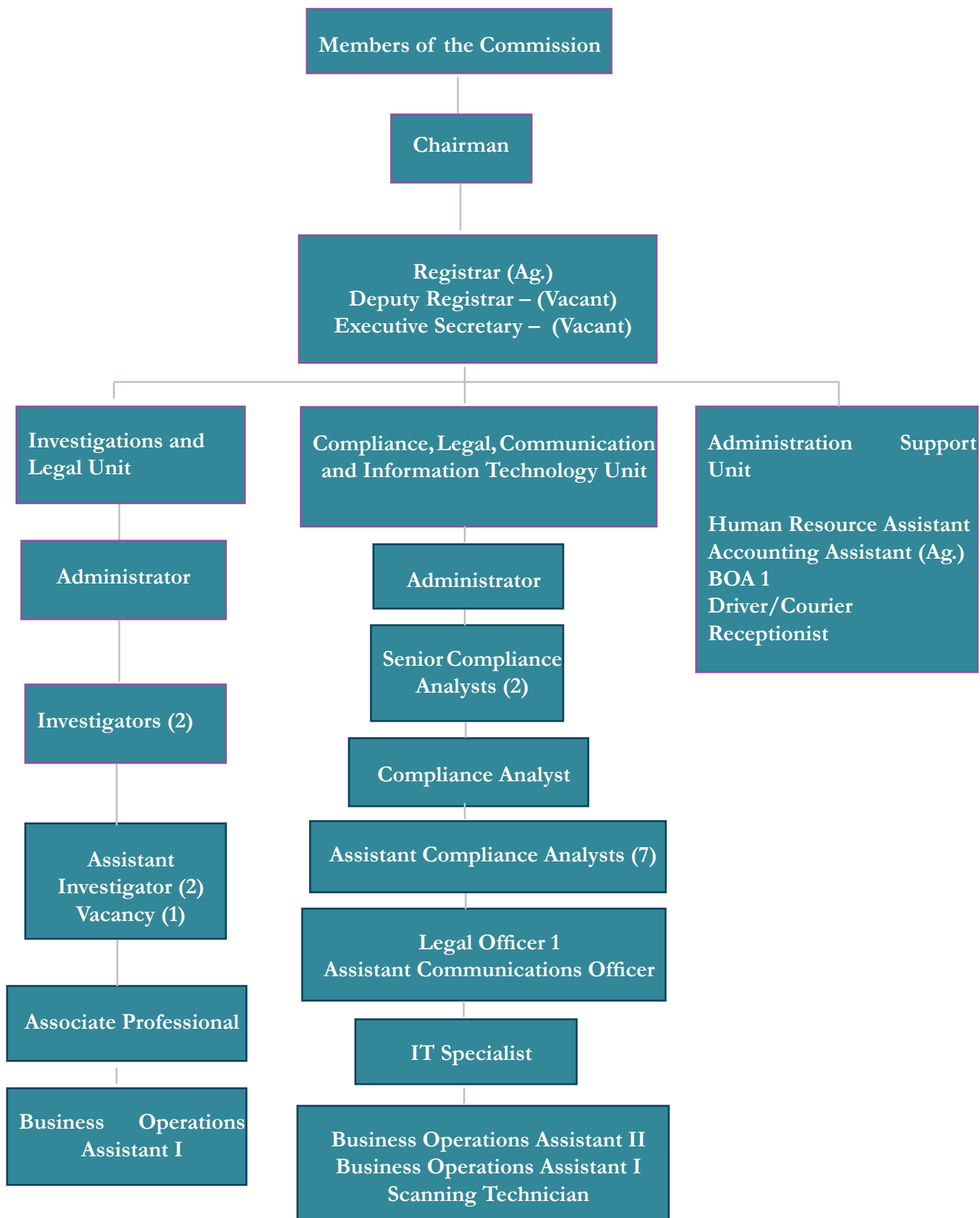
***"The Commission may for specific projects or investigations enter into contracts for the services of persons having technical or specified knowledge of any matter relating to the work of the Commission."***

With the understanding that hiring just one (1) Senior Counsel to assist in a recent matter of great public interest, cost approximately Ninety Thousand Dollars (\$90,000), in addition to VAT, it is inconceivable that the Commission can ensure that supplemental legal advice can be obtained as that must also come from the current funds allocated to expenditure, which is Forty-Five Thousand Dollars (\$45,000). The same sum to be spent on Process Servers. These resources, which may be readily available for persons being investigated, are inaccessible to the Commission.

It must further be remarked that almost Zero Point Six (0.6) Million Dollars (\$600,000.00) is allocated for payment to public servants who have already been transferred out of the Commission, rendering these monies, which may instead be put forward for more staffing in Compliance and Investigation Units, unavailable for the work of the Commission. The Commission has therefore had to be resourceful in its allocation of funds, as shown by the chart below demonstrating fees allocated in expenditure.



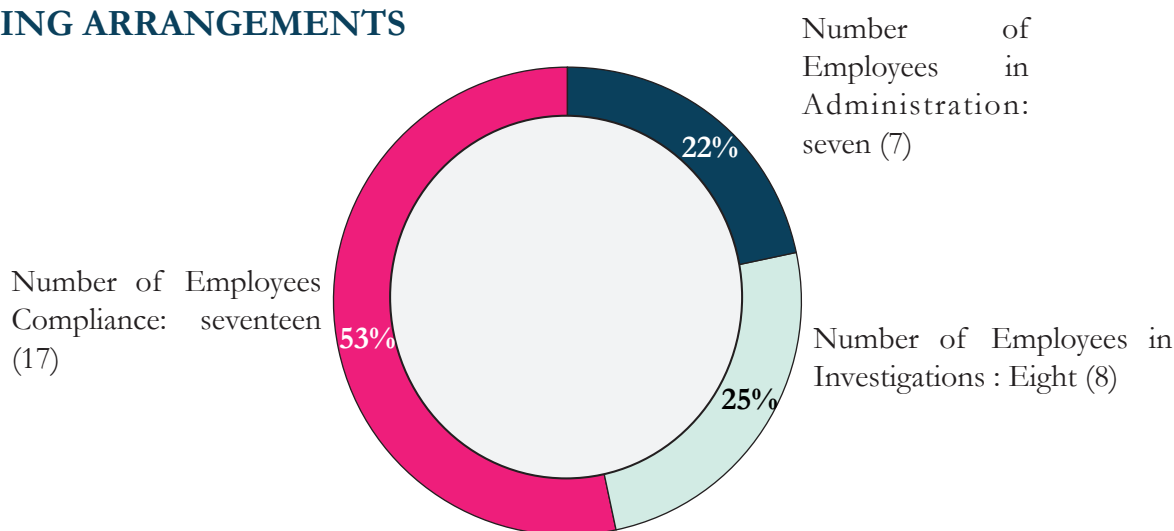
# ORGANISATIONAL CHART



## ORGANISATIONAL STRUCTURE

The Commission continued to transform the organisation to place greater emphasis on the allocation of human resources to its core units of compliance and investigation of complaints. The re-engineering of staffing in administration, investigations and compliance marked a shift from a surplus of employees in administration to a more balanced division of employees throughout these three core divisions. Whereas 63% of total staff represented Administration in January 2021, by the end of 2022, 25% of the total staff were allocated to the Investigations Unit and 53% to the Compliance Unit.

## STAFFING ARRANGEMENTS



The Commission also fully implemented a workflow chart to improve the efficiency of the Compliance Unit and has expanded the percentage of employees in the Unit from twenty percent (20%) to forty percent (40%). This included contracting young university graduates with Accounting and Economics degrees as Assistant Compliance Analysts to work under Senior Analysts.

Yet, the presence of 67% of staff members on short-term contracts of three months to six months duration raises questions about the viability of conducting investigations with personnel on short-term contract. After all, it is imprudent to have persons on short-term contracts review confidential files with information of persons in public life. This led to the submission of a Cabinet Note for fixed-term employment to uphold the overriding tenet of confidentiality and detract from creating a revolving door workplace. In the area of Investigations, persons on three-month contracts may leave anytime with the result of investigations having to be started over.

The Commission sought to involve staff in its change management philosophy and to remind them of the serious nature of the statutory mandate entrusted to the Commission. In the course of implementing the said change in organizational culture, the Commission solicited the views of the Head of the Public Service and the Chief Personnel Officer and sought and obtained the advice of the Solicitor General, so as to ensure that its actions are consistent with the laws of the Republic of Trinidad and Tobago. The Commission believes that all of its actions and decisions are consistent with the advice received.



## DIGITISATION

The Commission has sought to digitize its operations through the introduction of an Electronic Document Reader Management System (“EDRMS”) Solution (“the Solution”) and undertaking of a Digitization Project (“the Project”).

As a precursor to the implementation of such Solution and the outcome of the Project, a scanning project has been commenced whereby the Commission has undertaken to scan all investigative files. As of December 2022, all investigative files in relation to the one hundred and seven cold cases were scanned.

The ultimate aim of the Solution and the Project is to aid in better and more efficient complaint management. A key aspect of the Solution and the Project would also be the management of the complaint tracking mechanism so as to automate most, if not all, of the procedure resulting in quicker updates being provided to Complainants. A request for proposal has been issued by the Commission in this regard. However, in this aspect, like others, budgetary constraints have served to stymie the Commission’s efforts to implement same.

The Commission thus requires the support of the Ministry of Finance, through enhanced budgetary allocations, in order to conform to the vision of a digitized economy.

## STRATEGIC PLANNING

A strategic plan detailing the goals, objectives and key strategies of the Commission for the period 2022-2025 has been outlined. Each Unit of the Commission is tasked with fulfilling its respective objectives. Administration, in particular, is responsible for:

- Providing support to departments with their HR and Accounting needs to meet their strategic goals and objectives
- Supporting the re-engineering of the organizational structure
- Developing and sourcing funding for training and development plan and technological solutions
- Developing public awareness campaign, outreach programmes plan and sensitization programmes
- Providing support to improve the evidence collection powers and processes for investigation

Overall, the Commission aims to effectuate its mandates in accordance with the IPLA. The Commission aims to do this by improving its key processes, such as the complete review of all filed declarations and statements of registrable interests for the years 2014-2023, the completion of ex parte proceedings and the closure of all cold files and all investigations for complaints filed in 2021-2022.

The Commission’s proposed structural re-engineering also intertwines with this aim. The Commission’s change management philosophy seeks to augment the effectiveness of the Commission by deploying staff more strategically throughout its three core divisions in order to improve the aforementioned key processes.

The Commission’s aim of increasing training and developmental programmes will further bolster employee engagement within the Commission. This will coalesce with the aim of forging strategic alliances with other key stakeholders.

The Commission is also focused on technological transformation by establishing a digital form and guidelines for

submitting complaints. The digitization of the Commission also extends to its goal of engaging public interest in its functions and services. Outreach programmes and public education campaigns are promulgated through social media such as Facebook, Instagram and YouTube. The Commission also recommenced its newsletter, which is disseminated to media outlets as part of the vision for public sensitization.

## **COMMUNICATIONS**

### **INTERNAL**

Each Unit of the Commission (Investigations, Compliance, and Administration) has its own meetings as well as meetings with the Registrar and Chairman. Any concerns or issues are raised by members of staff in these meetings, which are treated with by the Commission.

### **EXTERNAL**

According to Section 5(1) (I) of the IPLA, the Commission shall:

**"Carry out programmes of public education intended to foster an understanding of standard of integrity"**

The Commission has traditionally engaged with the public in the context of public education strategies such as school competitions like the Creative Arts Competition 2023 (Keep Your Integrity, Deviate from Dishonesty). Budgetary constraints and staff reduction, nonetheless, have severely affected the conduct of these programmes. The Commission sought to innovatively compensate for this by utilizing social media platforms such as Facebook and Instagram to distribute public education and promote integrity-based content. The Commission saw an increase in its Instagram followers by thirty-six percent (36%) as well as an increase in followers on its Facebook account by sixty-five percent (65%) as at 31st December 2021.

Extensive efforts were also continuously made via the official website of the Commission. However, the Commission is naturally limited in its abilities to properly carry out the stipulated statutory function prescribed by Section 5(1)(i) of the IPLA, by being restricted to the use of virtual means.

The 17th Commission has expanded its reach to include the wider community through greater use of social media. International Anti-Corruption Day 2022, promoted on social media pages, was a valuable occasion for explaining the workings of the Commission to key stakeholders through an event geared at educating stakeholders under the theme, 'Change: The only way to make a difference.' Key stakeholders, as well as some diplomatic missions resident in Trinidad and Tobago, participated in discussions about how their organizations can help the Commission fulfil its statutory duties.



*Commission Members at the Annual Anti-Corruption Day Conference 2022*

## TRAINING

The limited budget renders it difficult to establish training programmes for staff members. As a consequence of a large percentage of staff being employed on short term contract, training programmes are deemed high risk.

Despite these challenges, the Commission has found creative ways to facilitate training through partnerships with external agencies. The Embassy of the United States, for example, provided one week of training for staff members in 2022. The training, divided into practical and theoretical components, was conducted by four (4) Federal Bureau of Investigation (FBI) officers and focused on methods of detecting potentially corrupt actions in law enforcement, border, contract and judicial matters, as well as misappropriation of funds. Training is expected to continue into 2023.

The Canadian High Commission has also initiated discussions about assisting the Integrity Commission with training.

# CHARTING A WAY FORWARD

## AMENDMENTS TO THE IPLA

The Commission has completed an extensive review of the IPLA and has approved certain amendments to be submitted to Cabinet for consideration. These amendments would resolve those obstacles to the effectiveness of the legislative framework of the Commission by granting power to the Commission with third parties to engage in the verification of Declarations and Statements of Registrable Interests, introducing sanctions for breaches of Code of Conduct, expanding and clarifying jurisdiction over persons exercising public functions and reviewing decisions of the Commission regarding complaints of corruption.

The major amendments sought are highlighted below.

## JURISDICTION

An amendment to the IPLA has been proposed to bring all persons exercising public functions in all state entities under the jurisdiction of the Integrity Commission. With the proposed amendment, the Commission would be given power to expand its jurisdiction. It is being proposed that “persons exercising public functions” include all persons holding office under the Public Service, Judicial and Legal Service, Police Service, Teaching Service and Statutory Authorities’ Service Commission, members of the Diplomatic Service, Advisers to the Government; local authority and anybody (whether corporate or unincorporated).”

## INDEPENDENT POWER TO REPORT MATTERS TO THE OFFICE OF THE DPP

In the course of its investigations, the Commission may encounter instances where there is evidence of misconduct in public life but persons who may be culpable are not within the jurisdiction of the Commission. In such instances, the Commission has found evidence of wrongdoing by persons employed in state enterprises but who are not within its jurisdiction because they are not persons in public life or exercising public functions. The legislation as currently exists does not provide for referral of matters to the DPP regarding persons not in public life or exercising public functions. This amendment will ensure that no criminal deeds go unpunished.

## ACCESS TO THIRD PARTIES FOR VERIFICATION OF DECLARATIONS AND STATEMENTS OF REGISTRABLE INTERESTS

One of the proposed amendments to the IPLA is for the Commission to have the power to write to third parties with the intention of receiving further particulars to verify the accuracy of information given by declarants submitting their Declarations and Statements of Registrable Interests.

## **SANCTIONS FOR BREACH OF CODE OF CONDUCT**

The Code of Conduct highlights ethical standards that ensure persons are impartial and fair in exercising public functions, and preserve the confidentiality of information, even after leaving their post. These persons are not to give preferential treatment, arrange private interest that would undermine public confidence in their office, use public property for personal interest or use their office for improper advancement. These persons are also not allowed to use information obtained while executing their public functions to seek private interest or use this information to influence decisions for private interest. They are also prohibited from accepting gifts except those connected to their duties.

The proposed amendment to the IPLA consists of making it an offence to breach the Code of Conduct. The public perception of the Commission as impotent is underscored by its inability to enforce integrity among persons in public life. The Commission is seen as a body that reinforces the negative distinction between persons in public life and the general public, in such that persons in public life are spared from the full force of the law.

Therefore, the Commission strongly recommends Parliament to consider the addition of sanctions as a coercive method of deterring behaviour that is contrary to the ethical standards of the Code of Conduct. Sanctions will target those offending persons in public life.

The enforcement of disciplinary and punitive methods would persuade offenders to adhere to the Code of Conduct. These ramifications for corrupt behaviour cause shifts in cultural behaviours. Though tolerance for corruption is now ‘mainstream,’ meaning that it percolates into all echelons of our social and economic order, any tolerance for corruption would be undermined with the introduction of sanctions.

## **SANCTIONS FOR WITHHOLDING INFORMATION IN THE STATEMENTS OF REGISTRABLE INTEREST**

The Commission has also proposed an amendment to the IPLA that would introduce a penalty for withholding information in Statements of Registrable Interests. The Commission has found that an issue exists whereby some Persons in Public Life have declared information in their Declarations of Income, Assets and Liabilities but did not provide requisite information in their Statements of Registrable Interests. As Statements of Registrable Interests can be publicly accessed and is one of the measures providing for public disclosure, it is in direct conflict with the purpose of the IPLA which states that the legislation is to “make new provisions for the prevention of corruption of persons in public life by providing for public disclosure” when persons do not include information which they are required to under the IPLA. Therefore, in order to achieve greater compliance with the statutory provisions relating to Statements of Registrable Interests, failure to provide relevant information should attract sanctions.

## STATUS OF PROPOSED AMENDMENTS

It must be noted that the Commission submitted amendments to the IPLA (First Submission) on February 9, 2022 and received no response. Subsequently, the First Submission was withdrawn and resubmitted on January 4, 2023. There has been no response.

Additionally, the Commission submitted a proposal for changes to the Regulations for Registration of Statements of Registrable Interests to correct the error whereby the Form states “Confidential”, when in fact the parent legislation provides for public access. This was originally submitted to Cabinet on April 27, 2022, but the Commission understands that it was subsequently withdrawn on October 25, 2022 without reason.

## PROPER FUNDING OF THE COMMISSION

Section 5(2)(a) of the IPLA states:

**"In the exercise of its powers and performance of its functions under this Act, the Commission shall not be subject to the direction or control of any other person or authority"**

According to Section 9 (2) of the IPLA **"The Commission shall be provided with adequate staff for the prompt and efficient discharge of its functions under the Act."**

However, given the finances allocated to the Commission within the recent years, it is a materializing factor that the Commission may be limited in executing its statutory mandate in an efficient and effective manner due to a limited budget.

The issue arising is who determines the adequacy of staff? This cannot be the sole discretion of the Ministry of Finance and mechanisms must be introduced to ensure meaningful consultation between the Ministry of Finance and the Commission to determine the adequacy of resources. While the Commission has made immense efforts to efficiently maximise the amounts allocated during the period 2021 to present, the Commission has reached a demarcation line and requires additional funding to operate. The Commission thus strongly advocates those decisions concerning funding be made in meaningful consultation with the Commission. To this end, the Commission has taken steps to draw the attention of the Ministry of Finance to the funding dilemma.

## IMPROVED CO-ORDINATION IN INVESTIGATION AND ENFORCEMENT WITH EXTERNAL STATE ENTITIES

The Investigations Unit must work with external state entities such as the Companies Registry, Land Registry and Inland Revenue to prosecute breaches and to enforce compliance with ex parte Orders. The establishment of formal mechanisms for ensuring cooperation with state bodies such as the Office of the Director of Public Prosecutions and the Board of Inland Revenue is therefore one of the necessary administrative changes that will improve enforcement. Collaboration between the Commission and the Office of the Director of Public Prosecutions is also particularly essential for the prosecution of breaches and the enforcement of compliance with ex parte Orders.

## HUMAN RESOURCES DEVELOPMENT

The Commission recognizes the importance of job security and interconnectedness for the development of the Commission's human capital which in turn impinges on the sustainability of the holistic organization.

One of the obvious limitations to the development of the Commission's human capital is the offer of solely short-term contracts for professionals. The short-term contract arrests opportunities for advancement, proving that this form of employment is inimical to long-term professional development. This causes employees to leave for more stable positions, creating a high employee turnover. In effect, the short-term contract compromises the security of tenure and the holistic nature of the organization. This may not have previously been a problem as the four investigators comprising the Investigations Unit were all retired police officers with ages ranging from the 60s to 70s. Being recipients of full pensions, these individuals would not be excessively troubled by short-term contracts which can extend over many years. In the Compliance Unit, two of the four Compliance Officers were retired staff from the Board of Inland Revenue. Again, short-term contracts were not inherently inconvenient. With a cadre of younger staff members, driven by the mantra of performance, it is critical that long-term contracts are offered to ensure that there is an adequate rate of return to the Commission from its training efforts. The Commission should represent a future for these employees instead of being a short-term option.

To circumvent the inherent insecurity of the short-term contract, the Commission has a 'built-in renewal process,' that is, rather than mutely dismiss professionals, the Commission uses performance reports to justify renewal or termination of contracts. This process, deployed out of necessity of preserving the integrity of the Commission, therefore simulates long-term employment.

Of worthy notice is the opinion of the Solicitor General, who, in 2021, advised in accordance with the Integrity in Public Life Act that as an independent entity, the "Commission has to be provided with staff that it requires to discharge its function in a prompt and efficient manner." The Solicitor General also advised that the Commission "has the authority to appoint or employ the officers and employees which it requires to discharge its functions" and, due to this, "if the Commission is of the opinion that 'for the proper carrying out of its functions' such persons should be given fixed term contracts instead of the current short-term contracts it can do so."

The Commission first sent a Note for consideration by the Cabinet on March 29, 2018, on the subject of employing additional staff. A letter was then sent to all Ministries and Departments outlining proper guidelines for submission on August 19, 2020. The Commission then submitted a new Note for consideration by Cabinet on January 20, 2021. The Commission aims, as outlined in that Note, to strengthen staffing structure by creating additional offices in the permanent establishment and providing long-term contracts to ensure that the highly confidential nature of the work is preserved. No response was received on that Note and a revised Note was submitted on August 12, 2022. The Ministry of Public Administration responded to the Commission on November 01, 2022, and sought revisions of the Note. The Commission re-submitted the Note on November 28, 2022. The Commission still awaits a response.

# COMMISSION MEMBERS



**Professor Rajendra Ramlogan, Chairman**

Prof. Rajendra Ramlogan is the Commercial and Environmental Law professor at the University of the West Indies. Professor Ramlogan obtained a Bachelor of Arts in English Literature and a Bachelor of Laws from the University of the West Indies. Professor Ramlogan graduated with a Masters of Law in International Legal Studies from the New York University School of Law and a Doctorate in International Environmental Law from the University of Cambridge. Professor Ramlogan is a Fellow of the Cambridge Commonwealth Society. Before his university career, Professor Ramlogan worked in the local oil industry and also enjoyed a stint as a Foreign Intern at the highly prestigious Washington DC law firm, Wilmer, Cutler and Pickering (now Wilmer Hale).

Professor Ramlogan has published numerous books and articles covering subjects such as Business Law, Commercial Law, Judicial Review, Sustainable Development, International Environmental Law, National Environmental Legal systems (Trinidad and Tobago and Cuba), Environmental Health, Environmental Refugees, International Environmental Crimes, Development and the Environment, Environmental Democracy, Human Rights in Japan, International Security and Energy Joint Ventures.





**Mr Frederick Gilkes, Deputy Chairman**

Mr Frederick Gilkes was appointed Deputy Chairman of the Integrity Commission of Trinidad and Tobago on December 17, 2018. Mr Gilkes has served as a partner at JD Sellier + Co. for thirteen (13) years and as the firm's Chief Executive Officer for one (1) year. He currently serves as Head of Chambers at the Caribbean Commercial Law Chambers and as a Senior Ordinary Member of the Law Association of Trinidad and Tobago. His extensive experience in the legal field spans Civil Litigation, Industrial Relations Litigation, Intellectual Property Litigation, Admiralty Law and Banking, Securities and Securities Law.

He was admitted to practise law in Trinidad and Tobago, Antigua and Barbuda, Grenada and its dependencies, St. Vincent and the Grenadines and the British Virgin Islands, in 1988, 1994, 2006, 2014 and 2020, respectively. Mr Gilkes has also served as Director of critical companies in Trinidad and Tobago. He has tutored and lectured at the Faculty of Law, University of the West Indies, St. Augustine Campus, principally in Criminal Law and Contract Law. He is also a certified mediator and has a keen interest in football.



**Ms Eleanor Bridgeman-Volney, Member**

Ms Eleanor Bridgeman-Volney was appointed Member of the Integrity Commission of Trinidad and Tobago on August 03, 2018, and is currently in her second term of appointment. Ms Bridgeman-Volney served in the Inland Revenue Division of the Ministry of Finance for thirty-five (35) years. During the period 1992 to 2015, she functioned in critical positions such as the Head of the Legal Section, in the capacity of Senior State Counsel and later as Chief State Counsel, and as one of the Board's Managers. She was admitted to practise law in Trinidad and Tobago in 1979. In 2008, she was also appointed as a Member of the Permanent Double Taxation Team of the Ministry of Finance.

Ms Bridgeman-Volney is passionate about Latin and ballroom dancing and is an avid gardener. She also has a penchant for events management.



**Ms Sandra Honoré, Member**

Ms Sandra Honoré was appointed Member of the Integrity Commission on December 17, 2020. She entered the then Ministry of External Affairs in 1979 and had assignments to the country's Embassies in Brazil and the United States of America. She was assigned to the Office of the Prime Minister from 1990 to 1996. At the Foreign Ministry, she served as Director of the CARICOM and Caribbean Affairs Division, Chief of Protocol and Director of the Americas Division. She was Chief of Staff to the Assistant Secretary-General of the Organization of American States (OAS) from July 2000 to July 2005, supervising many aspects of the Organisation's work on Haiti.

Ms Honoré was appointed Ambassador Extraordinary and Plenipotentiary on September 11, 2007 and assigned as Ambassador to Costa Rica in December 2008. In 2013, the United Nations Secretary-General named her Special Representative and Head of the United Nations Stabilization Mission in Haiti (MINUSTAH). She served from July 2013 until the end of that Mission in October 2017.



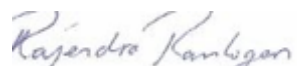
**Mr Lyndon Brent James, Member**

For the past nineteen years, Lyndon Brent James has been a qualified Chartered Accountant and was appointed to the Seventeenth Commission of the Integrity Commission in March 2021.

Mr James has had extensive experience in the oil and gas sector as a financial professional, with his formative years as an auditor examining the financial statements and internal controls of various companies over a wide array of business sectors. Mr. James is also involved in various charitable organisations within Trinidad and Tobago, on a national scale, and is a keen sports fan.

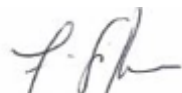
# SUBMISSION OF REPORT

This report is submitted to the Parliament, pursuant to Section 10 of the Act on this 27th day of March, 2023.



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Professor Rajendra Ramlogan  
Chairman



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Frederick Gilkes  
Deputy Chairman



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Eleanor Bridgeman-Volney  
Member



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Sandra Honoré  
Member



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Lyndon James  
Member