



**37<sup>TH</sup> ANNUAL REPORT  
TO THE PARLIAMENT OF TRINIDAD AND TOBAGO  
FOR THE YEAR 2024**

# LETTER OF TRANSMITTAL

January 31, 2025

**Mr. Brian Caesar**  
**Clerk of the House**  
**Parliament of Trinidad and Tobago**  
Parliamentary Complex  
Cabildo Building  
St. Vincent Street  
**PORT OF SPAIN**

Dear Mr. Caesar

## **Thirty-Seventh Annual Report to Parliament for the Year 2024**

The Integrity Commission of Trinidad and Tobago is pleased to submit its **Thirty-Seventh (37<sup>th</sup>) Annual Report** to Parliament outlining its activities for the year ended December 31, 2024. The Report has been prepared in compliance with Section 10 of the Integrity in Public Life Act, Chapter 22:01, which states:

*"The Commission shall, not later than 31<sup>st</sup> 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 31<sup>st</sup> May, so, however, that the reports shall not disclose particulars of any declaration filed with the Commission."*

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

Yours Respectfully



**HADYN GITTENS**  
Chairman

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# CHAIRMAN'S REPORT

## INTEGRITY COMMISSION OF TRINIDAD AND TOBAGO 37<sup>TH</sup> ANNUAL REPORT TO THE PARLIAMENT OF TRINIDAD AND TOBAGO FOR THE YEAR 2024

The Integrity Commission of Trinidad and Tobago aspires to be the preeminent guardian of good governance, beacon of accountability, and defender of the public trust. Our mission is to prevent, detect, and investigate corruption, holding those in public life to the highest standards of ethical conduct.

One of the many challenges faced by the Commission from inception was that of ensuring willing compliance by persons in public life to fulfilling their statutory duty of filing their annual Declarations. We deliberated extensively over alternative approaches to making the exercise more user-friendly, particularly for the financially less sophisticated and less organized public official. After reaching agreement on our strategy, we embarked upon our compliance drive with the aim of substantially exceeding current compliance benchmarks.

1. Utilizing internal staff resources and equipment, we created a very detailed **Tutorial Video** which we distributed extensively to the universe of declarants and which has proven to be very effective in guiding persons in public life on how to complete their annual declarations. This tutorial video is available on the Integrity Commission's website at [www.integritycommission.org.tt](http://www.integritycommission.org.tt).

2. Concurrently, our Compliance Unit conducted numerous '*Know Your Forms*' workshops for a range of public agencies including Regional Corporations, Statutory Authorities and State-owned entities.
3. Additionally, in recognition of the critical responsibilities held by public sector leaders in driving ethical practices, transparency and strong governance, we systematically reached out to heads of public bodies and agencies, providing them with relevant information, engaging them on the compliance performances of their respective Boards and offering to provide assistance as required. In this regard, we specifically targeted those Boards whose levels of compliance were historically low.

We are encouraged by the level of compliance achieved so far this year and are happy to advise that, as at December 31, 2024 we were able to achieve a compliance level of 78%, a 17% increase over the same year compliance performance experienced in 2023 (61%). In this regard, I would like to acknowledge the efforts of the staff within the Compliance unit and, indeed, all the staff of the Commission, which led to this tremendous achievement. I also commend the leadership and Board membership of the many public entities, who worked diligently with the Commission to ensure achievement of that compliance milestone.

In November 2024, in accordance with powers contained in Section 11(6) of the Integrity in Public Life Act (IPLA), the Commission published the names of 328 Persons in Public Life (accounting for 388 Declarations of Income, Assets and Liabilities (Form A) and Statements of Registrable Interests

(Form B)) who failed to file declarations for the years 2021 to 2023, in two newspapers of general circulation and the Trinidad and Tobago Gazette. This represented a notable reduction from 465 Persons published (accounting for 521 Declarations) in 2023. The Commission will utilize its power contained in Section 11(7) of the IPLA to make *ex parte* applications to the High Court for orders directing persons who continue to be non-compliant after publication, to comply with the Act. In the event of further non-compliance, the Commission will pursue further legal action against delinquent Persons in Public Life as prescribed for under Section 11(8). Coming out of the initiatives undertaken in 2024 however, we will be in a position to zero in and focus on the public entities that were plagued by low compliance whilst ensuring that general compliance levels continue to improve.

The Commission is also conscious of the need to improve the efficiency and effectiveness of the process of examination and certification of Declarations, even in the context of significantly diminished human resources. In this context, we are actively engaged in assessing and rationalizing the current work-flows within the Compliance Division and will be supplementing process improvements with appropriate technological solutions in order to significantly improve examination and certification throughput.

Within the Investigations Unit, there were **51** matters under active investigation as at December 31, 2024 and we were able to close nineteen **(19)** matters during the course of the year.

Under powers contained in Sections (5) (g) and (h) of the IPLA, we engaged two public entities with the aim of ensuring that their policies and procedures were strengthened so as to reduce the possibility of occurrence of corrupt practices. In similar fashion to the process-related interventions within the Compliance Division, we will also undertake an end-to-end examination of existing processes and procedures within the Investigations Department in order to increase efficiency and reduce case duration.

Over the year to date, staff of the Commission were exposed to specialist training geared at improving investigative competencies, financial analysis and forensic accounting. Staff also participated in conferences hosted by anti-corruption-focussed international organizations, building valuable relationships and gaining useful information on international best practices and developments. Staff members also benefited from non-technical, administrative training.

In addition to conducting the day-to-day business of the Commission, as a team we have focused on the following priorities:

1. Building a strong team by resolving existing staffing issues and implementing initiatives to build morale and strengthen competencies through targeted training.
2. Strengthening the legislative framework through sensible amendments to the Act.
3. Simplifying Declarant interface and improving operating efficiency through digitalization.

We continue to work towards achievement of these mission-critical objectives.

With respect to priority (1), since 2017, the majority of staff at the Commission, currently as much as 71%, have been employed on short term, that is, three-month contract arrangements. This has led to pervasive instability and uncertainty within the organization. Many skilled professionals are hesitant to join or remain with the Commission due to the lack of job security and long-term career prospects. Moreover, short-term employment is not the most appropriate form of engagement given the highly sensitive and confidential nature of the work we perform. Whilst we are sensitive to current national fiscal challenges, this is not a tenable nor sustainable situation over the medium to long term. We will continue our efforts aimed at obtaining Cabinet approval for budgetary allocations that will allow the Commission to hire suitably qualified and experienced staff on reasonably competitive employment terms and conditions in order to ensure that the Commission effectively carries out its important mandate.

In relation to priority (2), the Board of Commissioners devoted some time and effort in early 2024 to reviewing the IPLA and identifying anomalies and areas within the legislation that could be strengthened in order to allow the Commission to more effectively carry out its function.



We specifically focussed on amendments and additions that would strengthen the Commission's ability to enforce amendments and improvements in policies and procedures within public bodies so as to reduce the occurrence of corrupt practices, fortify the investigative powers of the Commission, increase protections afforded to whistle-blowers and witnesses, introduce penalties for breaches of the Code of Conduct and facilitate the sharing of information with sister agencies. Unfortunately, the Cabinet Note submitted by the Commission, which contained our recommendations for legislative amendments, did not receive the requisite Cabinet support. We will, however, continue our efforts to strengthen our effectiveness and impact via legislative reform.

With respect to priority (3), we are grateful to the Ministry of Finance for having approved a sizeable capital allocation in the 2025 Budget that will allow us to commence our all-important digitalization project. This project is currently underway and we have started the process of digitizing our paper files and records. We have issued an RFP for Phase 1 of our digitalization exercise, which will involve the scoping of our current processes, state of readiness, solution identification, costing and execution timetable and expect to commence Phase (1) by February 2025.

I am thankful that I have had the very good fortune to be part of a superb team at the Integrity Commission. The commissioners are all extremely competent individuals who provide invaluable, objective and high-quality input during Board deliberations. The members of staff of the Commission are hard-working professionals, unquestionably committed to the work of the Commission. I am proud to be a member of this team.

## THE BOARD OF COMMISSIONERS

The Integrity Commission is a constitutional body created by Sections 138 and 139 of the Constitution of the Republic of Trinidad and Tobago and established by Section 4 of the Integrity in Public Life Act (IPLA). As prescribed under Sections 4(1) to (3) of the IPLA, the Commission consists of a Chairman, Deputy Chairman and three other members who shall be persons of integrity and high standing. At least one member shall be an Attorney-at-law of at least ten years' experience and at least one member shall be a chartered or certified accountant. The Commission currently satisfies these requirements.



*(Board of Commissioners as at 31<sup>st</sup> December, 2024. From left, Mr. Hadyn Gittens, Chairman; Mrs. Michelle Palmer-Keizer, Member; Ms Lorelly Pujadas, Member; Mrs. Gillian Wolfe-O'Neil, Member and Mr. Frederick Gilkes, Deputy Chairman).*

# VISION, MISSION, OBJECTIVES, CORE VALUES AND THEME

## VISION

To be the premier state institution for the promotion and preservation of integrity in all affairs, to make Trinidad and Tobago a corruption free society.

## MISSION

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.

## OBJECTIVES OF THE COMMISSION

- 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.

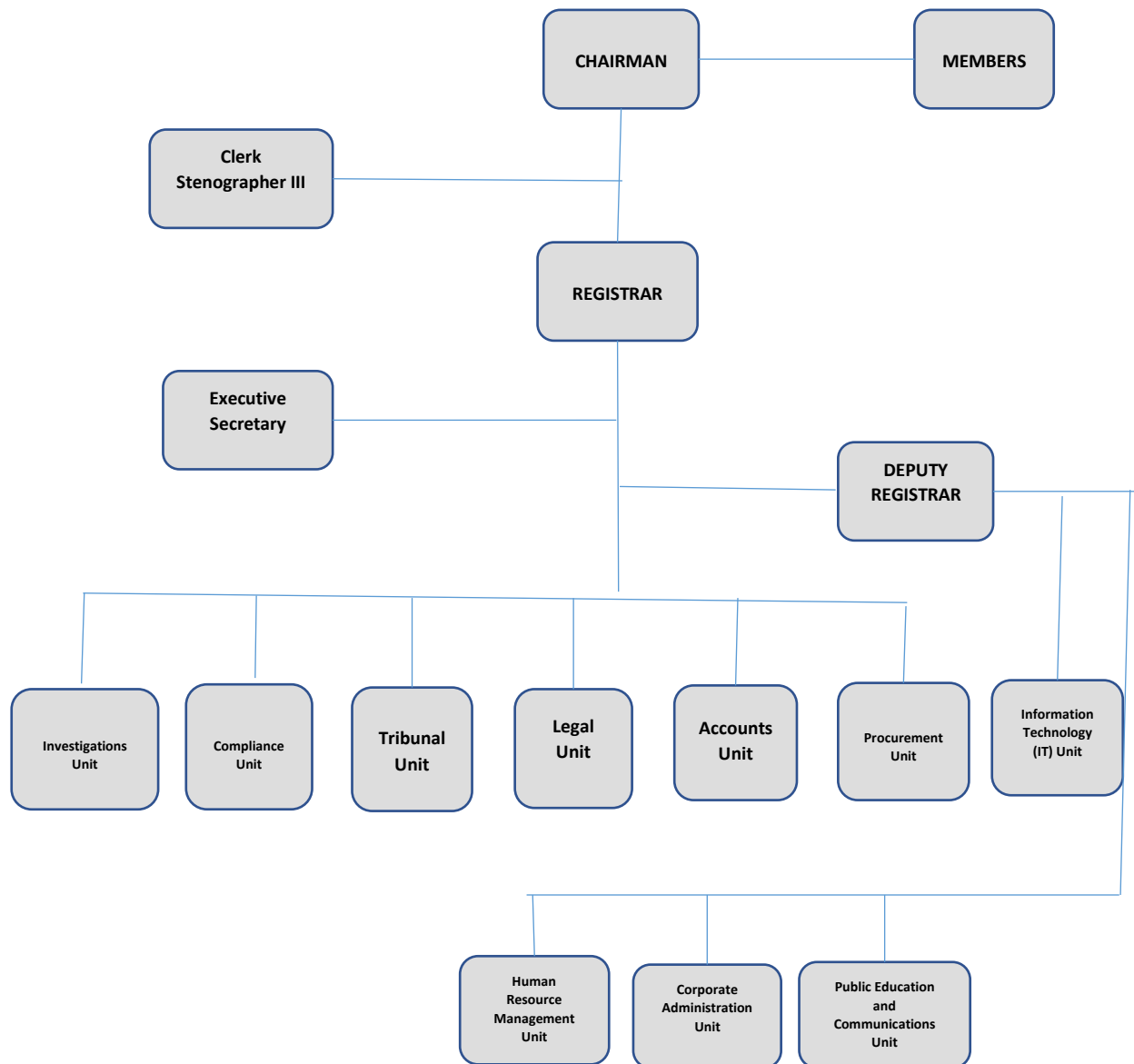
## CORE VALUES

- Confidentiality
- Integrity
- Professionalism
- Teamwork.

## THEME

*"Do the right thing always".*

# ORGANIZATIONAL STRUCTURE



## BUDGET ALLOCATIONS VERSUS ACTUAL EXPENDITURE – 2023 AND 2024

Item	Requested Budgetary Allocation 2023 (\$)	Approved Allocation 2023 (\$)	Actual Expenditure 2023 (\$)	Requested Allocation 2024 (\$)	Approved Allocation 2024 (\$)	Actual Expenditure 2024 (\$)
Permanent Staff	2,498,758	2,496,770	1,616,183	3,275,297	2,496,770	2,279,935
Contract Staff	0	0	0	5,620,452	0	0
Short Term Employment	2,967,928	3,425,660	3,358,066	3,666,260	3,500,000	3,301,943
Operating Expenses	2,772,314	2,776,570	2,288,697	15,174,886	2,702,230	2,630,169
Total Recurrent Expenditure	*8,239,000	8,699,000	7,262,946	27,736,895	8,699,000	8,212,047
Development Programme	1,200,000	300,000	0	3,000,000	0	0
GRAND TOTAL	*\$9,439,000	\$8,999,000	\$7,262,946	\$30,736,895	\$8,699,000	\$8,212,047

(\*) The requested allocation for 2023 was capped at \$8,239,000.00 based upon a ceiling instituted by the Ministry of Finance for the submission of Draft Estimates of Recurrent Expenditure for Fiscal 2023.

## UNIT REPORTS

### THE COMPLIANCE UNIT

In accordance with powers outlined in Section 5(1) (b) to (d), (g) and (h) of the Integrity in Public Life IPLA (the IPLA), the Compliance Unit oversees and reviews compliance by persons in public life with the relevant provisions of the IPLA. The principal functions performed by the Unit are:

- receiving, examining and retaining all declarations filed with the Commission under the IPLA;
- making enquiries, when necessary, in order to verify the accuracy of the declarations filed under the IPLA;
- recommending for publication the names of persons in public life who have failed to file their declarations;
- examining the practices and procedures of public entities, in order to facilitate the discovery of corrupt practices; and
- instructing and advising the heads of public entities of changes in practices and procedures of entities that may be necessary to reduce the occurrence of corrupt practices.

### Persons in public life

The persons in public life, as defined by the IPLA are:

- Members of the House of Representatives
- Ministers of Government
- Parliamentary Secretaries

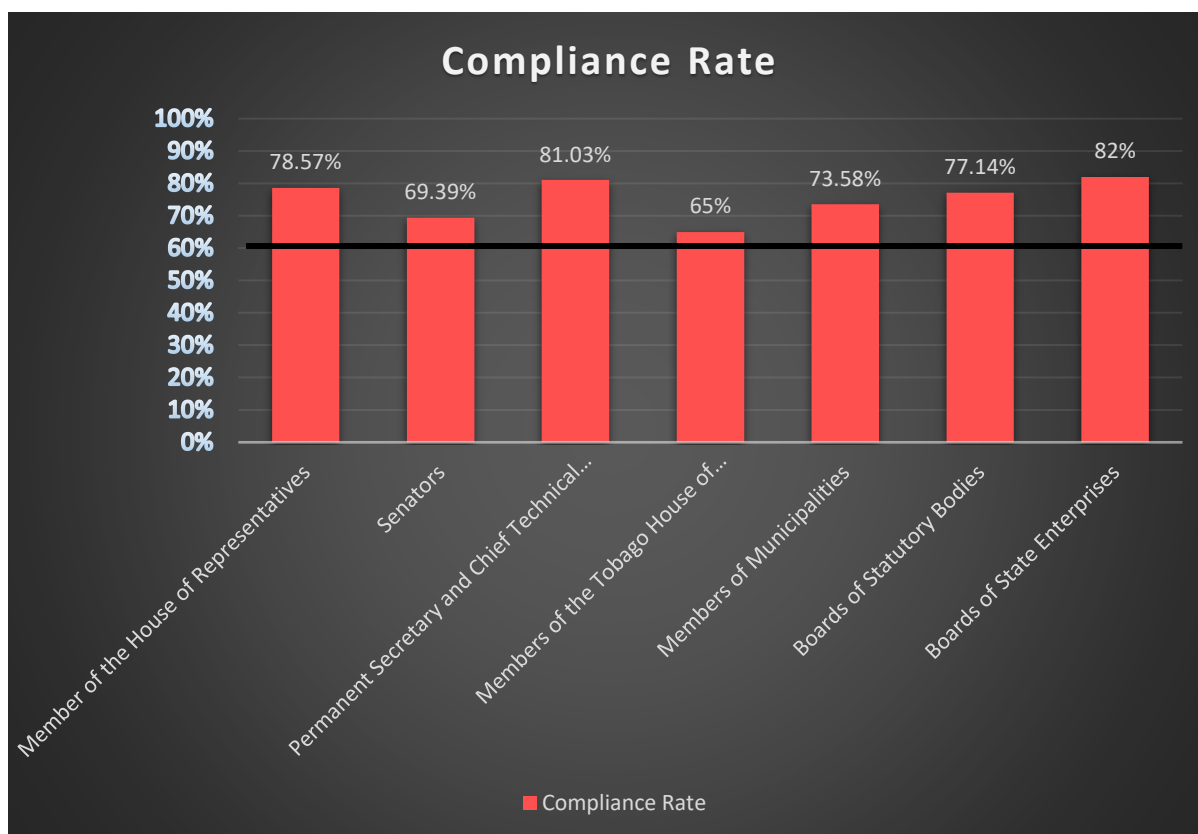
- Senators
- Members of the Tobago House of Assembly
- Members of Municipalities
- Members of Local Government Authorities
- Members of the Boards of all Statutory Bodies and State Enterprises in which the State has a controlling interest
- Permanent Secretaries and Chief Technical Officers.

## Compliance Performance

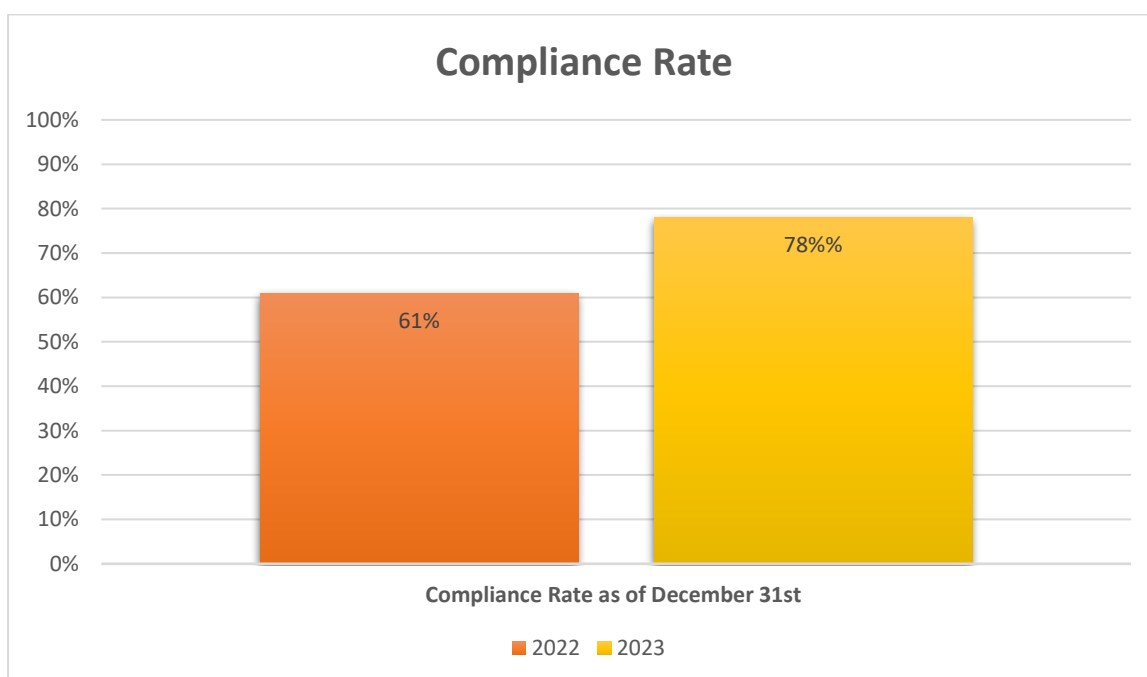
The Compliance Unit achieved an overall compliance rate of **78%** with respect to the submission of Declarations of Income, Assets and Liabilities and Statements of Registrable Interests by persons in public life for the year ended December 31, 2023. This represented a **17% increase** when compared to the previous year, for which the rate of compliance was **61%**. This is a significant achievement as it represents the highest compliance rate recorded in any year of operations by the Commission.

Moreover, on average, persons in public life, across all seven (7) defined categories, achieved a compliance rate of **60% and above**. Two (2) of the categories, namely Permanent Secretaries and Chief Technical Officers and Members of the Boards of Statutory Bodies recorded compliance rates of **over 80%**. Three (3) of the categories scored compliance rates of **over 70%**, including the Members of the House of Representatives at **79%**. This is another significant achievement as it represents the highest compliance rate recorded by a number of categories in any year of operations by the Commission.

**Diagram 1** - Compliance levels for each category of Declarations for the year 2023:



**Diagram 2** - Comparison of compliance levels for Declarations for the years 2022 and 2023:



**Note** - The previous year compliance rate has been restated to incorporate persons in public life who were required to file for the year 2022 but were not accounted for previously.



The Commission formulated and implemented a **Compliance Drive Initiative** during the first quarter of 2024, in an effort to increase compliance levels among those persons in public life who were required to file declarations for the year ended December 31, 2023. The drive also targeted persons who had not filed for previous years.

The baseline compliance rate that was set for the Compliance Drive Initiative was achievement of an **average compliance rate of 65%** by November 05, 2024.

The main elements of the Compliance Drive Initiative were as follows:

- The development and widespread dissemination to persons in public life of a comprehensive **tutorial video** that provided a step-by-step guide on the completion of their declarations of income, assets and liabilities and statements of registrable interests. This is easily accessible on the Integrity Commission's website at [www.integritycommission.org.tt](http://www.integritycommission.org.tt).
- A much more targeted approach to stakeholder engagement. Specifically, formal communication was sent to all public bodies whose compliance rates were traditionally low. The Heads/Chairpersons of these bodies were provided with information on current compliance levels and advised on the implications of low compliance from a governance and legal perspective. Additionally, the Heads/Chairpersons were “put on the spot” with respect to their critical role and function in ensuring compliance and strong governance.

- The conducting of “Know your Forms” presentations to municipalities, statutory bodies, state enterprises and other organisations. These presentations guided members of the Boards of these entities on a step-by-step basis through the declaration process and were very well received.

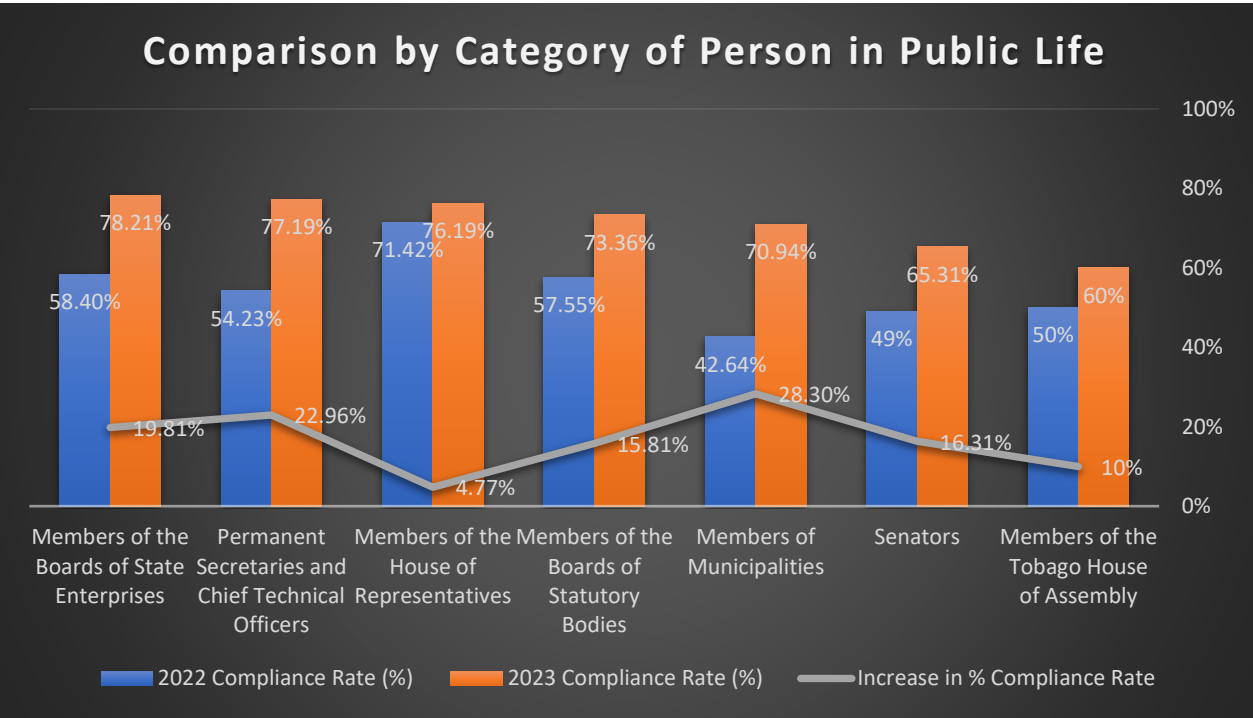
## RESULTS OF THE VOLUNTARY COMPLIANCE INITIATIVE

The Compliance Drive Initiative yielded a compliance rate of **74.14%** as at November 5, 2024, which was the deadline date set by the Commission for receipt of Declarations prior to publication. The baseline compliance rate target of 65% was exceeded by **9.14%**.

The Table below summarizes the Compliance rates as at November 5<sup>th</sup> 2024, for each of the categories of Persons in Public Life for the year 2023 when compared to the previous year.

Category of Persons in Public Life	2022 Compliance Rate (%)	2023 Compliance Rate (%)	Increase in % Compliance Rate
Members of the Boards of State Enterprises	58.40	78.21	19.81
Permanent Secretaries and Chief Technical Officers	54.23	77.19	22.96
Members of the House of Representatives	71.42	76.19	4.77
Members of the Boards of Statutory Bodies	57.55	73.36	15.81
Members of Municipalities	42.64	70.94	28.30
Senators	49	65.31	16.31
Members of the Tobago House of Assembly	50	60	10

**Diagram 3** below illustrates compliance among the categories of Persons in Public Life when compared to the previous year:



The highest compliance rate of **78%** was achieved by Members of the Boards of State Enterprises and the lowest was **60%** by Members of the Tobago House of Assembly. The category that achieved the largest percentage increase from 2022 to 2023 was that of Members of Municipalities at **28.30%** and the lowest percentage increase was **4.77%** by the Members of the House of Representatives.

The following table further details the compliance performance for the Commission’s universe of Public Bodies **as at November 05, 2024**.

	Particulars	Number of Entities	Percentage %
1.	No. of Public Bodies that achieved a compliance rate between 90% to 100%	32	25.40
2.	No. of Public Bodies that achieved a compliance rate between 70% to 89%	53	42.08
3.	No. of Public Bodies that achieved a compliance rate between 50% to 69%	29	23.00
4.	No. of Public Bodies that achieved a compliance rate of 50 % and above	114	90.48
5.	<b>No. of Public Bodies whose compliance rate fell below 50%</b>	<b>12</b>	<b>9.52</b>
	<b>Total</b>	<b>126</b>	<b>100</b>

The data indicates that thirty-two (32) of the one hundred and twenty-six (126) Public Bodies achieved a compliance rate of between 90% and 100% (25.40% of the database). Fifty-three (53) Public Bodies achieved a compliance rate of between 70% and 89% (42.08% of the database). Cumulatively, **90.48%** of Public Bodies achieved an overall compliance rate of 50% and above.

It is noteworthy that, of the thirty-two (32) public bodies, that scored a compliance rate of between 90% to 100%, thirty-one (31) of the Heads/Chairpersons of those entities filed their declarations for the year 2023, underlining the importance of leadership by example in creating a culture of integrity and strong governance in the public sector.

In our effort to sustainably upgrade the culture within the public service to one where the principles of transparency, good governance and strict observance of the law are upheld, we recognized the efforts of the leadership teams of the top thirty-two (32) Entities towards achieving compliance rates of 90% to 100% by awarding those bodies a Certificate for Compliance.

The recipients of the Certificates for Compliance were as follows:

NO.	NAME OF CORPORATE BODY
1.	The Agricultural Development Bank
2.	The Airport Authority of Trinidad and Tobago
3.	Alutrint Limited
4.	The Couva/Tabaquite/Talparo Regional Corporation
5.	The Criminal Injuries Compensation Board
6.	The Estate Management and Business Development Company Limited
7.	EximBank of Trinidad and Tobago Limited
8.	The Mayaro/Rio Claro Regional Corporation
9.	The MIC Institute of Technology
10.	National Helicopter Services Limited
11.	The National Institute of Higher Education Research Science and Technology
12.	National Investment Fund Holding Company Limited
13.	National Marine and Maintenance Services Company Limited
14.	National Quarries Company Limited
15.	Queen's Hall
16.	The Regulated Industries Commission
17.	Rural Development Company of Trinidad and Tobago Limited
18.	The Southern Academy for the Performing Arts
19.	Taurus Services Limited
20.	Telecommunications Authority of Trinidad and Tobago Limited

NO.	NAME OF CORPORATE BODY
21.	The National Academy for the Performing Arts
22.	The National Gas Company of Trinidad and Tobago Limited
23.	The National Trust of Trinidad and Tobago
24.	The Office of Procurement Regulation
25.	Tourism Trinidad Limited
26.	The Trinidad and Tobago Electricity Commission
27.	The Trinidad and Tobago Freezones Company Limited
28.	The Trinidad and Tobago International Financial Centre
29.	Trinidad Generation Unlimited
30.	Trinidad Petroleum Holdings Limited
31.	Youth Training and Employment Partnership Programme (YTEPP) Limited
32.	Boards Appointed to address The Dissolution of State Enterprises (Ministry of Finance Investment Division)



*Members of the Queens Hall Board, with Chairman, receiving their Certificate for Compliance at a site visit*





*Chairman of the T&TEC Board receiving the Certificate for Compliance at a site visit*



*Chairman of the Trinidad Petroleum Holdings Board receiving the Certificate for Compliance at a site visit*

These Certificates for Compliance were awarded during the Anti-Corruption Day seminar, which was held by the Commission on December 06, 2024 and during follow-up site visits conducted by the Commission.



*Recipients of the Certificate for Compliance*







*A cross-section of attendees at the Anti-Corruption Day Seminar 2024*







*An attendee engaged in the question and answer session of the panel discussion*



*Attendee engagement at the Anti-Corruption Day Seminar 2024*

## Public bodies who failed to achieve the 50% compliance threshold

Regrettably, 9.52% of the public bodies achieved an overall compliance rate of below 50%. In an effort to address this unsatisfactory situation, during the first quarter of the year 2025, the members and staff of the Commission will be conducting structured meetings with the Chairpersons and the members of the Boards of those bodies aimed at addressing performance issues as they relate to compliance as well as exploring solutions to improve their compliance levels.

## *“Know Your Forms” Briefing Sessions*

During the reporting period, the Commission delivered **thirteen (13)** *“Know Your Forms”* Briefing Sessions to **over one hundred (100)** persons in public life. This included the conducting of a number of in-person seminars to municipalities, statutory bodies, state enterprises and other organisations as well as virtual presentations to the Boards of The Agricultural Development Bank, The Occupational Safety and Health Authority, The CEPEP Company Limited and The Children’s Life Fund Authority. These briefing sessions were a critical part of the Compliance Drive initiative embarked upon by the Commission to improve compliance among persons in public life.

The Table below summarizes the list of agencies that benefitted from the Commission’s *“Know your Declaration Forms”* briefing sessions.

No.	Agency	Category of Persons in Public Life/ Senior Public Officials	No. of Participants
1.	The Arima Borough Corporation	Members of Municipalities	8
2.	The Agricultural Development Bank	Members of the Board of State Enterprise	6
3.	The Children's Authority of Trinidad and Tobago	Members of the Board of Statutory Body	10
4.	The Couva/Tabaquite/Talparo Regional Corporation	Members of Municipalities	16
5.	The Gambling Control Commission of Trinidad and Tobago	Members of the Board of Statutory Body	5
6.	The Occupational Safety and Health Authority	Members of the Board of Statutory Body	12
7.	The Point Fortin Borough Corporation	Members of Municipalities	10
8.	The Port of Spain Shopping Complex	Members of the Board of State Enterprise	6
9.	The San Juan/Laventille Regional Corporation	Members of Municipalities	12
10.	The Sangre Grande Regional Corporation	Members of Municipalities	10
11.	The CEPEP Company Limited	Members of the Board of State Enterprise	12
12.	The Children's Life Fund Authority	Members of the Board of Statutory Body	9
13.	The Accreditation Council of Trinidad and Tobago	Members of the Board of Statutory Body	8



*Know Your Form training session*



Our evaluation of the outcomes of the briefing sessions held confirmed a significant increase in the rate of compliance in 2023 by Persons in Public Life at all of the public bodies we visited when compared with the previous year.

## **Examination and Certification of Declarations**

Section 13(1) of the Integrity in Public Life IPLA, Chapter 22:01 gives the Commission the authority to examine declarations and to request from persons in public life any further particulars or explanation required.

During the year under review, the Commission was able to examine three hundred and forty-two (**342**) declarations of the one thousand and thirty-seven (**1,037**) declarations received for the year ended December 31, 2023. This represents a rate of examination of **33%**, an **8%** decrease when compared to 2022, where three hundred and forty-nine (**349**) declarations were examined during the course of that year.

## **Certificates for Compliance**

Section 13(3) of the IPLA provides that once the Commission is satisfied that a declaration has been fully made it shall forward to the declarant, a Certificate of Compliance. In this regard, the Commission issued ninety-three (**93**) Certificates of Compliance for the year ended December 31, 2023. This represents a rate of certification of **9%** and a **6%** decrease when compared to 2022 where one hundred and twenty-seven (**127**) declarations were certified.

**Diagram 4** illustrates the number of declarations received, examined and certified for the years ended December 31, 2022 and December 31, 2023:

No.	Details	2022	2023
1.	Number of Persons in Public Life required to file declarations	1,381	1,335
2.	Number of Persons who filed declarations	844	1,037
3.	Number of declarations examined	349	342
4.	Number of declarations examined as a % of Number of persons filed	41%	33%
5.	Number of Certificates of Compliance issued	127	93
6.	Number of Certificates of Compliance issued as a % of Number of persons who filed	15%	9%

The data shows a declining trend in the rate of examination and certification of the declarations received for the years 2022 and 2023 respectively.

The rates of examination and certification are admittedly unsatisfactory, due, in large part, to the general staff headcount reduction within the Commission and specifically within the Compliance Unit, which is currently operating at forty-seven percent (47%) of its required complement of staff because of the significantly reduced national budget allocation to the Commission. We will be seeking to address this issue by undertaking a comprehensive review of the examination process within the Unit and we additionally expect that one of the main outcomes of our digitalization project will be a significant increase in throughput and workflow efficiency within the Unit.

## Enforcement

In the face of non-compliance on the part of persons in public life in the filing of their Declarations of Income, Assets and Liabilities and their Statements of Registrable Interests without reasonable cause, the Commission can pursue the following courses of action:

- Publish of the names of persons who failed to file their declarations or statements in the Gazette and at least one (1) daily newspaper (Section 11(6)).
- At any time after publication, make an *ex parte* application to the High Court for an order directing such persons to comply with the IPLA (Section 11(7)). A person who fails to comply with the directions of the Court commits an offence and is liable on conviction to a fine of one hundred and fifty thousand dollars.

## Publication

In accordance with 11(6) of the IPLA, the Commission published the names of Persons in Public Life who failed to file their Declarations of Income, Assets and Liabilities (Form A) and Statements of Registrable Interests (Form B) for the period 2021-2023 in the Trinidad Express Newspaper on Friday, November 08, 2024 and the Trinidad Guardian Newspaper on Sunday, November 10, 2024, and in the Trinidad and Tobago Gazette on November 19, 2024.

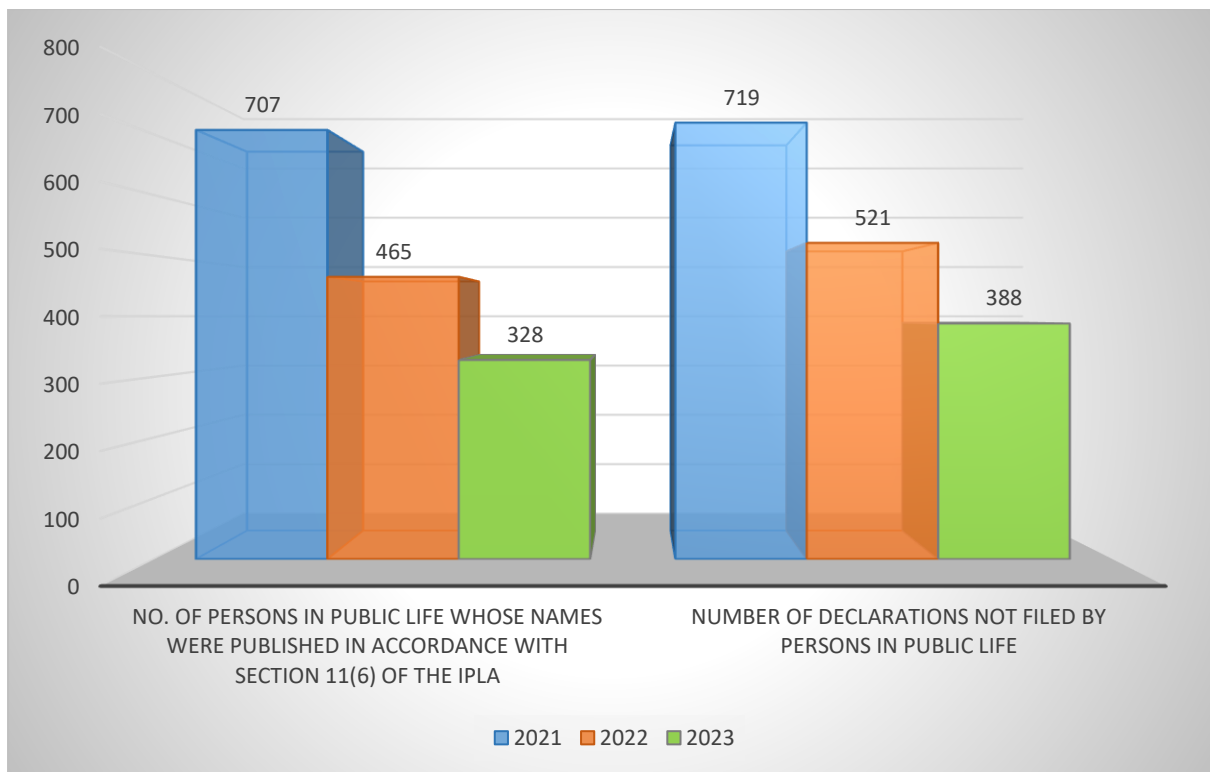
This publication accounted for a total of three hundred and eighty-eight (388) Declarations of Income, Assets and Liabilities (Form A) and Statements of Registrable Interests (Form B) from three hundred and twenty-eight (328) persons in public life who failed to file declaration forms.

### Comparative Publication Statistics – 2021 to 2023

Year	2023	2022	2021
Number of Persons whose names were published in accordance with section 11(6) of the IPLA	328	465	707
Number of Declarations not filed by persons in public life	388	521	719

There was a **29%** reduction in the number of persons failing to file their declarations in accordance with the IPLA when compared to the year 2022 and a **54%** reduction when compared to the year 2021. This reduction is reflective of a significant increase in voluntary compliance mainly due to the Compliance Drive Initiative.

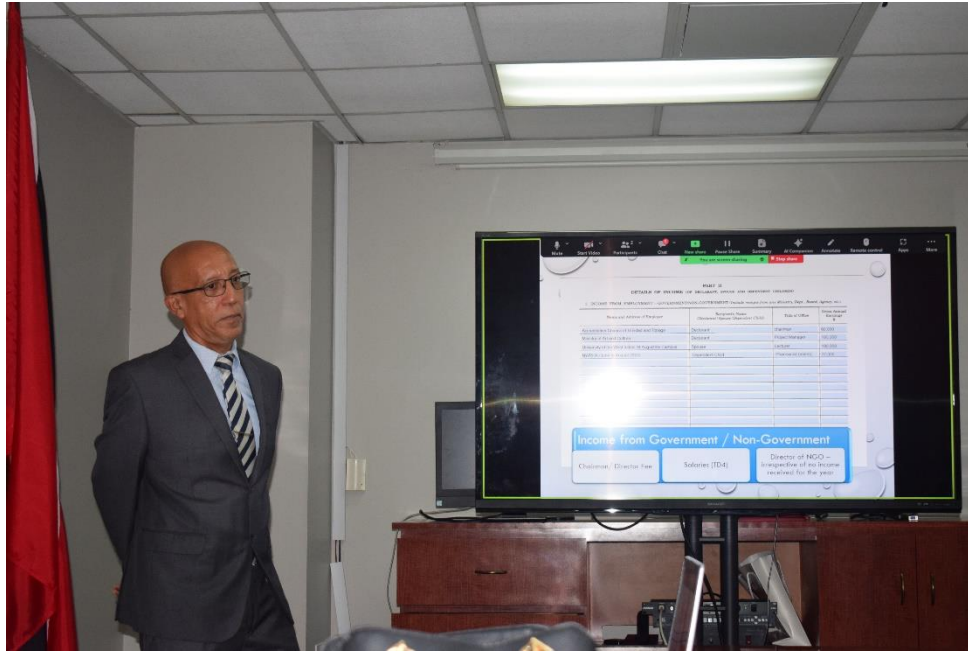




Notwithstanding the improved compliance statistics, the Commission will continue to pursue its zero-tolerance approach to persons in public life who fail to meet their statutory obligation to file their Declarations of Income, Assets and Liabilities (Form A) and Statements of Registrable Interests (Form B).



*Site visit to conduct training session in Know Your Forms*



*Director, Compliance facilitating training session*

## Confidential Meetings

The Commission continues to provide a confidential and secure environment and close oversight and guidance by our experienced Compliance officers within our offices to assist declarants in complying with their statutory obligations. During the period under review a total of four hundred (400) confidential meetings were held as part of the Compliance Drive Initiative to provide guidance to persons in public life in the filing of their declaration forms or to facilitate the provision of additional information to the Commission.

## Register of Interests

The Commission, in accordance with section 14 of the IPLA, compiles and maintains a Register of Interests, which provides information to the public on certain aspects of the personal and business interests of Persons in Public Life that may potentially present a conflict of interest in the context of their public duties.

The Commission shall, at the request of any member of the public, permit the inspection of such Register under specified conditions. During the period under review, **nine** persons accessed the Register, which represented an eighty-nine per cent (89%) increase when compared to the previous year when one person accessed the Register.

## THE INVESTIGATIONS UNIT

### Investigations - Active Cases

- As at **January 01, 2024**, there were thirty (30) active matters being actioned by the Investigations Unit.
- The total number of active matters being actioned by the Investigations Unit was fifty-three (53) as at **December 31, 2024**.
- For the year ended December 31, 2024, thirty-two (32) new complaints were received by the Commission. Twenty-eight (28) of the new complaints received in 2024 were examined during the year.
- For the year ended December 31, 2024, **four** matters were initiated by the Commission on its own initiative, under powers contained in Section 33(a) of the Integrity in Public Life Act (IPLA).
- For the year ended December 31, 2024, nineteen (19) active matters were closed. With respect to four matters, the Commission found no breach of the (IPLA) or the Prevention of Corruption Act (PCA), or any

other evidence of dishonest or corrupt conduct. Ten (10) matters were dismissed under Section 34A of the IPLA. Commission determined that it had no jurisdiction with respect to four other matters. Finally, one other matter was closed due to the fact that no documentation was held that would support any action by the Commission

- As at December 31, 2024, two public entities were advised and/or instructed of changes in practices and procedures to reduce the occurrence of corrupt practices.

### Data on the 2024 Workflow

Active Cases as at January 01, 2024	Current Number of Active Cases as at December 31, 2024	New Complaints received	New Complaints Examined	Matters initiated by the Commission on its own initiative	Active Cases Closed as at December 31, 2024	Public Entities Advised of Changes in Practices and Procedures
30	53	32	28	4	19	2

### Comparative Data on the 2023 Workflow

Active Cases as at January 01, 2023	Number of Active Cases as at December 31, 2023	New Complaints received	New Complaints Examined	Matters initiated by the Commission on its own initiative	Active Cases Closed as at December 31, 2023	Public Entities Advised of Changes in Practices and Procedures
33	30	16	16	9	28	4

## Update on Cold Cases

- Approximately ninety-five (95) matters classified as ‘cold cases’ were discovered upon an audit of the Investigations Unit during the year 2021. These matters were not classified as ‘active’ at the time of the audit but were deemed as requiring further action.
- As at December 31, 2024, twenty-three (23) cold cases remain to be resolved. The Commission has not yet made a decision with respect to seventeen (17) of these matters. The remaining six matters are currently under investigation or other appropriate action by the Commission.
- Ten (10) additional cold cases were closed over the period January 01, 2024 to December 31, 2024. Six of those matters were closed after confirmation of closure by a previous Commission. One was closed on the basis that there was no breach of the IPLA or the PCA, or any other evidence of dishonest or corrupt conduct. Two matters were rejected pursuant to section 34A of the IPLA.

One matter was closed after referral to the DPP. Cumulatively, therefore, a total number of seventy-two (72) cold cases have been closed as at December 31, 2024.

## Data on Cold Cases as at December 31, 2024

Cold Cases Based on 2021 Audit	Cold Cases closed as at December 31, 2024	Cases remaining to be resolved	Cases remaining for an initial consideration and decision by the Commission	Cases currently being investigated and/or actioned by the Commission	Cold Cases closed during the period January 01, 2024 to December 31, 2024
≈ 95	72	23	17	6	10

## Comparative Data on Cold Cases as at December 31, 2023

Cold Cases Based on 2021 Audit	Cold Cases closed as at December 31, 2023	Cases remaining to be resolved	Cases remaining for an initial consideration and decision by the Commission	Cases currently being investigated and/or actioned by the Commission	Cold Cases closed during the period January 01, 2023 to December 31, 2023
≈ 95	62	33	28	5	44

## Other Activities

### Training delivered by the European Union Global Facility on AML/CFT

During the period September 09, 2024 to September 11, 2024, technical staff of the Investigations Unit attended training delivered by the European Union Global Facility on AML/CFT. The three-day training course focused on turning intelligence into evidence in the context of anti-money laundering and explored topics relating to the understanding and analysis of financial documents, forensic accounting and techniques for the investigation of financial crimes.





*Above: European Union Global Facility on AML/CFT Training*

*Below: Participants from the Investigations and Compliance Units with Trainers*

## Country Visit to Trinidad and Tobago in the Second Review Cycle of the Mechanism for the Review of Implementation of the United Nations Convention against Corruption

On May 28, 2024, a representative of the Investigations Unit attended and participated in the Country Visit to Trinidad and Tobago in the Second Review Cycle of the Mechanism for the Review of Implementation of the United Nations Convention against Corruption (UNCAC).

The indicated purpose of this exercise was to facilitate an inter-governmental process aimed at assisting State Parties in implementation of the UNCAC.

## Hugh Wooding Law School, Criminal Law Clinic Visit

In March 2024, the Commission facilitated a visit by students of the Human Law School, Criminal Law Clinic. A representative of the Investigations Unit attended and provided insight to students on the work of the Unit inclusive of fundamental legal aspects involved.



*Human Law School, Criminal Law Clinic students visit to the IC  
Photo with Chairman, Registrar and two members of staff*



# THE LEGAL UNIT

## EX PARTE APPLICATIONS

Section 11(1) of the IPLA states that, *"...a person shall, within three months of becoming a person in public life, complete and file with the Commission in the prescribed form, a declaration of his income, assets and liabilities that exceed ten thousand dollars in value in respect of the previous year and, thereafter, on 31<sup>st</sup> May in each succeeding year that he is a person in public life, he shall file further declarations of his income, assets and liabilities."*

Section 11(6) states, *"...where a person who is required to do so fails to file a declaration in accordance with this section or without reasonable cause, fails to furnish particulars in accordance with section 13 or fails to file the statement of registrable interests under section 14, the Commission shall publish such fact in the Gazette and at least one daily newspaper in circulation in Trinidad and Tobago."* On Friday, November 10, 2023, **465** names were published in the Trinidad and Tobago Express Newspaper for non-filing. These names were also listed in the Gazette on November 17, 2023.

Pursuant to Section 11(7) of the ILPA, the Commission may, at any time after the publication referred to in section 11(6), make an *ex parte* application to the High Court for an order directing such person to comply with the Act and the Court may in addition to making such an order, impose such conditions as it thinks fit.

In reliance on Section 11(7) of the IPLA, for the year 2024 and as at December 31, 2024, **282** applications for *ex parte* Orders of the Court were filed in relation to the aforementioned publication. This total was exclusive of declarants who complied after their names were published or who were excluded for other valid reasons. It should be noted that in December 2023, **18** applications for *ex parte* Orders of the Court were filed in relation to the aforementioned publication.

On November 08, 2024, **328** names of persons were further published for non-compliance with the requirement for filing for the years 2021, 2022 and 2023 in the Trinidad and Tobago Guardian Newspaper. On November 10, 2024 the list of 330 names of persons was also published in the Trinidad and Tobago Express Newspaper. Pursuant to Section 11(6) the said list was placed in the Gazette on November 19, 2024.

In 2025 the Commission will be embarking on taking *ex parte* action against those persons whose names were published for non-compliance for the years 2021, 2022 and 2023, who did not take advantage of the opportunity to submit their declarations after their names were published.

## SERVICE OF ORDERS

Once Court orders are obtained from the Court, the Commission is required to serve these orders to persons in public life. Service is done via personal service using the services of a process server externally and internally by designated staff. As at December 31, 2024, approximately **425** Orders were served.

When served, the Order then requires the person in public life to furnish the Integrity Commission within thirty (30) days of the date of service, with the completed declaration of income, assets and liabilities and the statement of registrable interests for the outstanding year or years.

Further, pursuant to Section 11(8) of the IPLA, should the Respondent fail to comply with the directions of the Court as set out in the Order, they will be deemed to have committed an offence and will be liable, upon conviction, to a fine of **\$150,000.00 dollars**.

## **PUBLIC EDUCATION**

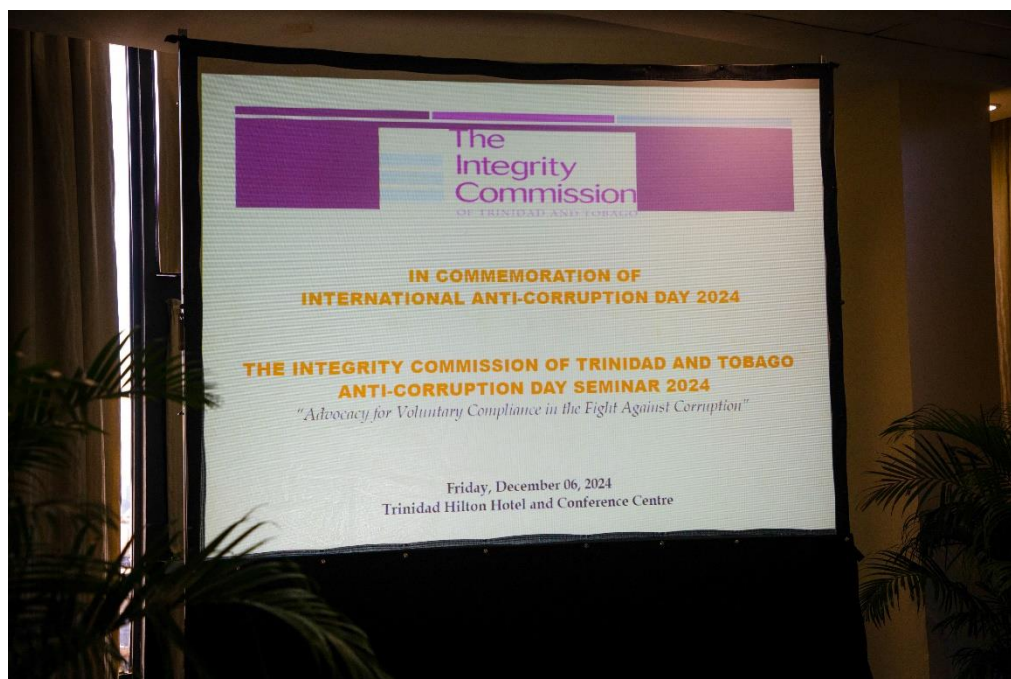
Pursuant to Section 5(1) I of the IPLA, the Commission shall carry out programmes of public education intended to foster an understanding of standard of integrity.

On August 22, 2024 and August 29, 2024, the Legal Unit of the Integrity Commission joined the Trinidad and Tobago Transparency Institute together with other agencies to carry out a free legal clinic open to the public. These clinics were conducted in Central and South Trinidad respectively.

## OUTREACH

The major outreach initiative undertaken by the Commission in 2024 was our hosting of the seminar in commemoration of International Anti-Corruption Day 2024 under the theme: *“Advocacy for Voluntary Compliance in the Fight Against Corruption”*.

The seminar, which was held at the Hilton Hotel and Conference Center, was well attended and featured an address by the Chairman of the Commission and an engaging and incisive panel discussion on *“The Relevance of the Integrity Commission in Fulfilling its Mandate”*. The panel included the Chairman and Deputy Chairman of the Integrity Commission as well as Mrs. Claire Gomez-Miller, Board member of the Trinidad and Tobago Revenue Authority and Mr. Terrance Farrell, member of the National Advisory Committee on Constitutional Reform.





*Members of the Panel from left: Mrs. Palmer-Keizer, Commission Member, Dr. Terrence Farrell; Mrs. Claire Gomez-Miller, Mr. Frederick Gilkes, Deputy Chairman and Mr. Hadyn Gittens, Chairman*

All members of the Board of Commissioners as well as members of staff of the Commission were heavily involved in the planning and execution of this important event, which was very well received by attendees.



*Chairman delivering his Opening Remarks*



Other outreach initiatives undertaken by the Commission during 2024 were as follows:

- In June 2024, The Chairman attended the 10<sup>th</sup> Annual Commonwealth Caribbean Association of Integrity Commissions and Anti-Corruption Bodies (CCAICACB) Conference, which was held in The Bahamas. The Chairman provided a Country Update and moderated a session on *“Best Practices to ensure the submission and timely processing of Annual Declarations”*.
- In August 2024, the Legal Unit of the Integrity Commission joined the Trinidad and Tobago Transparency Institute together with other agencies to carry out a free legal clinic open to the public. These clinics were conducted in Central and South Trinidad respectively.



*Free Legal Clinic session in progress by members of the Legal Unit*



- In May 2024, a representative of the Investigations Unit attended and participated in the Country Visit to Trinidad and Tobago in the Second Review Cycle of the Mechanism for the Review of Implementation of the United Nations Convention against Corruption (UNCAC). The indicated purpose of this exercise was to facilitate an inter-governmental process aimed at assisting State Parties to implement the UNCAC.
- In March 2024, the Commission facilitated a visit by students of the Human Law School, Criminal Law Clinic. A representative of the Investigations Unit attended and provided insight to students on the work of the Unit inclusive of fundamental legal aspects involved.
- During the reporting period, the Commission delivered **thirteen (13)** “*Know Your Forms*” Briefing Sessions to **over one hundred (100)** persons in public life. This included the conducting of a number of in-person seminars to municipalities, statutory bodies, state enterprises and other organisations as well as virtual presentations to various State Boards.



*Site Visit Presentation to Board members*

## MEMBERS OF THE COMMISSION



**Mr. Hadyn Gittens** has had over 30 years of experience in the financial sector, having represented various institutions at a senior level throughout the Caribbean. He started his banking career at Republic Bank Limited, then spent over 23 years representing the RBC Royal Bank Group in Trinidad and Jamaica, ultimately attaining the position of Group Head, Corporate Banking. In 2013, he was appointed the Chief Executive Officer of the Bank of Saint Lucia Limited, a position he held for three years. He was then appointed to the position of Chief Executive Officer of the Trinidad and Tobago Securities and Exchange Commission, a position he held between August 2017 and July 2020. In January 2024, Mr. Gittens was appointed to the position of Chairman of the Trinidad and Tobago Integrity Commission by Her Excellency, the President of the Republic of Trinidad and Tobago.

A highly qualified Executive, Mr. Gittens has over the years led and managed teams in competitive and results oriented environments throughout the region. His areas of expertise include Commercial and Corporate Banking, Credit Risk Management, Securities Regulation and business and financial consultancy.

He holds a Master of Business Administration from the University of Manchester, UK; as well as a Master of Science in Accounting, and a Bachelor of Sciences (Hons) in Industrial Management, both from the University of the West Indies St. Augustine.



**Mr. Frederick Gilkes** was appointed Deputy Chairman of the Integrity Commission of Trinidad and Tobago on December 17, 2018.

He was admitted to practise law in Trinidad and Tobago; Antigua and Barbuda; Grenada; St. Vincent and the Grenadines and the British Virgin Islands. Mr. Gilkes has tutored and lectured at the Faculty of Law, University of the West Indies, St. Augustine Campus, principally in Criminal Law and Contract Law.

Mr. Gilkes has served as a partner at JD Sellier & Company 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 an Executive Member of the Law Association of Trinidad and Tobago. His extensive experience in the legal field spans Civil Litigation, Intellectual Property Litigation, Admiralty Law and Banking, Securities and Securities Law.



**Mrs. Michelle Palmer-Keizer** is a recently retired C-suite executive with over 25 years of leadership experience at a leading Caribbean financial institution. She was appointed Member of the Integrity Commission of Trinidad and Tobago on December 19, 2023.

As a certified Life and High-Performance Coach, she is dedicated to helping mid-level leaders achieve their career aspirations and unlock their full potential.

Passionate about volunteerism and giving back, Michelle is a strong advocate for the power of paying it forward and empowering others to succeed. In retirement, she is dedicated to leveraging her extensive leadership experience and commitment to personal development to make a meaningful impact through volunteerism.





**Ms Lorelly Pujadas** was appointed Member of the Commission on March 25, 2024.

Ms Pujadas possesses a Bachelor of Arts from the University of Alberta, in Sociology with a minor in Political Science, and is a graduate of the Chartered Association of Certified Accountants, as well as a Fellow of the Canadian Comprehensive Auditing Foundation (CCAF-FCVI), International Fellowship Programme (Comprehensive Auditing).

Ms Pujadas is a former Auditor General with extensive experience in public auditing and budgeting. Ms Pujadas has also worked with the International Organization of Supreme Audit Institutions (INTOSAI) and served as a member of the CARICOM Audit Committee.



**Mrs. Gillian Wolffe-O'Neil** is the newest member of the Commission and was appointed to the Integrity Commission on 10<sup>th</sup> September 2024.

Mrs. Gillian Wolffe-O'Neil is an expert in the area of the applicability and understanding of tax in relation to the tax laws of Trinidad and Tobago and of the Republic of Guyana. She is a seasoned legal and tax professional with over three decades of distinguished service in law, tax advisory and corporate strategy.

Mrs Wolffe-O'Neil obtained a Bachelor of Laws from the University of the West Indies in 1986 and a Legal Education Certificate from the Hugh Wooding Law School. She was admitted to the practice of law in Trinidad and Tobago in 1989 and in 2017 in Guyana. Mrs Wolffe-O'Neil also holds a Post Graduate Advanced Diploma in Public Administrative Law from The University of the West Indies.



## SUBMISSION OF REPORT

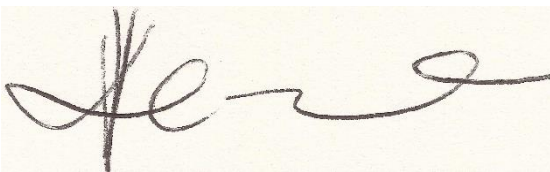
This Report is submitted to the Parliament, pursuant to Section 10 of the Integrity in Public Life Act (IPLA) on this 31<sup>st</sup> day of January, 2025.



**HADYN GITTENS**  
Chairman



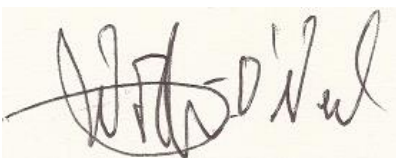
**ROGER MACEDO**  
Deputy Chairman



**MICHELLE PALMER-KEIZER**  
Member



**LORELLY PUJADAS**  
Member



**GILLIAN WOLFFE-O'NEIL**  
Member