



Integrity Commission

2024/2025 ANNUAL REPORT



United Against Corruption



INTEGRITY COMMISSION

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June 26, 2025

The Most Hon. Mrs. Juliet Holness, MP
Speaker of the House of Representatives
Houses of Parliament
Gordon House
81 Duke Street
Kingston

Senator the Hon. Tom Tavares-Finson, OJ, CD, KC, JP
President of the Senate
Houses of Parliament
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81 Duke Street
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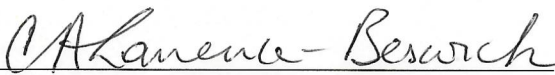
Dear Honourable Speaker and Honourable President:

Section 36(2) of the Integrity Commission Act directs as follows:

"The Commission shall, not later than three months after the end of each financial year, or within such longer period as the Parliament may approve, submit to Parliament an annual report relating generally to the execution of the functions of the Commission during the preceding financial year, which shall contain the information set out in the Second Schedule".

In keeping with this provision, I hereby submit to you three (3) printed copies and an electronic copy of the Seventh Annual Report for the financial year 2024/2025.

Yours respectfully,


The Hon. Ms. Justice (Ret'd) Carol Lawrence-Beswick, CD
Chairman
Integrity Commission

Copy: Ms. Colleen Lowe, Clerk to the Houses of Parliament

7th Annual Report

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Chapter 1 - Messages

Chairman's Remarks

"The time is always right to do what is right." - Martin Luther King Jr.

Changing of the Guard

February 2025 marked a pivotal moment for the Integrity Commission, as a changing of the guard saw the ending of the contracts of the esteemed Chairman and of a dedicated Commissioner. This transition ushered in a new era for the Board, with the appointment of a new Chairperson and Commissioner.

Mr. Brian Wynter, OJ, CD, former Governor of the Bank of Jamaica, joined the Commission, bringing particular financial expertise, succeeding Mr. Eric Crawford, and I was appointed as Chairperson, entrusted with the significant responsibility of continuing the distinguished work previously carried out by the Hon. Mr. Justice (Rt'd) Seymour Panton OJ, CD.

On behalf of the Commission, I thank both illustrious gentlemen for their sterling contribution to the fight against corruption. The steady hands of the Hon. Mr. Justice (Rt'd) Seymour Panton guided the Commission through many tumultuous waters which had converged around contentious issues. Mr. Eric Crawford gave solid leadership, ensuring that all the detailed requirements for the lawful functioning of the Commission were met.

During this period, Mrs. Keisha Prince-Kameka's professional contribution as Director of Corruption Prosecution concluded, as her contract also came to an end. The Commission is grateful for her work in helping to fulfill its mandate.

Mr. Roneiph Lawrence, who was our senior prosecutor, thereafter acted in the position of Director of Corruption Prosecution.

Successes of the Commission

The strides being made in the operation of the Commission are clear. During the 2024/2025 period there was a mammoth eight hundred percent (800%) increase in the examination of Statutory Declarations filed and the number of investigations also increased.

Not to be outdone was the Corruption Prevention Division which spread information far and wide about the work of the Commission through training sessions and other informative interactions with the public of all ages.

Year of Resilience

The year 2024 /2025 was one of change, growth and resilience at the Integrity Commission.

Misinformation from uninformed sources was plentiful but did not deter the Commission in its continued focused drive to operate in accordance with the Integrity Commission Act (ICA) in the effort to minimise corruption in this our Land.

Interestingly enough, there is reason to conclude that the onslaught of misinformation has served to pique the general interest of the public in the workings of the Commission and in understanding how the Commission can work for them on a personal level. Employees are showing interest in the opportunity to make Protected Disclosures.

Staffing

The turnover rate of the staff reduced during this period. Meanwhile, in keeping with the Government's policy, there was approval for the addition of thirteen (13) new posts to the structure of the Commission in order to remove the temporary positions which existed. Further approval from a Committee of Parliament will then cause the policy to actually come into effect and assist in retaining these committed staff members.

There are several vacancies throughout the Commission and many seem to arise from challenges in the classification structure which affect remuneration and also from the high-risk working environment.

Nonetheless training of staff is ongoing and this opportunity to improve is appreciated to the extent that some prosecutors bore the cost of their own training to hone their prosecutorial skills.

Finances

Utilisation of the approved budget of approximately J\$1.8 Billion approached the one hundred percent (100%) mark. The very generous additional funding from the United Kingdom Foreign, Commonwealth and Development Office, of more than twenty-nine million Jamaican dollars (J\$29,000,000.00) was gratefully received and provided support for key projects and the effective operation of the Commission, including, but not limited to software licences and training for the Case Management System.

International Activities

The Commission's interests extended outside our shores, and during the 2024/2025 period, there was celebration of the Anti-corruption Day with the international community.

Confidentiality and Security

The security of information kept by the Commission is of the highest priority. During this period the Commission's data backup infrastructure was successfully completed.

Further, privacy is a pillar of the Commission and there is therefore emphasis on Data Protection standards with ongoing and detailed training of the staff in this regard.

Social Media

The Commission has created two additional social media pages, Facebook and Instagram, to allow a wider cross section of the public to share in information from, and with, the Commission.

Review of the ICA

The Commission has identified some areas of its operation that would benefit from amendments to the ICA and has made numerous recommendations, annually, from 2019, to the Houses of Parliament, in accordance with section 60 of the Act which provides for the review of the Act. Included is the amendment which would make electronic filing of statutory declarations possible and would thereby create a convenient, easy method of filing.

During the 2024/2025 period, the Commission was still awaiting decisions from the Houses of Parliament concerning all the previously suggested amendments to the ICA.

The Parliament and particularly, the Joint Select Committee are expected, at their earliest convenience, to indicate their decisions concerning the recommendations for amendments which are detailed in this Report¹.

Recommendations

The Integrity Commission also made recommendations to a multitude of Public Bodies during the 2024/2025 period consequent upon its core function of monitoring contracts in respect of the procurement process.²

Many responses from those Bodies remain outstanding. Timely responses would provide answers/solutions important to prevent corruption or to expose it. For example, remaining unanswered during that period were questions as to the absence of security on Government work sites, the reasons for pausing the work under a contract, and how the time lost would affect the schedule of the project.

¹Appendix 5

²Appendix 3

Co-operation

The work of the Commission is inextricably related to co-operation from all echelons of our society. This report shows that the Commission is steadfastly working to fully meet its mandate.

However, the goal of eliminating, or reducing corruption in Jamaica demands commitment to that end from both individuals and leaders who desire to attain that goal.

Such commitment requires that the recommendations made by the Commission should not lie fallow on a desk. The questions posed as to issues being examined need answers, reports tabled need responses, requests made for assistance from the Parliament to create circumstances to attract and retain staff, should elicit action.

Action

Assurances ring loud from all quarters that “all well-thinking Jamaicans want a Jamaica free of corruption.” There is every indication that that sentiment is indeed true. However, until there is action concerning what needs to be done, those assurances ring empty.

The Integrity Commission has worked assiduously to eliminate corruption from the several angles detailed in the Report. Naysayers abound but have not deterred the positive focus of the hardworking and dedicated staff and Directors. Instead they have energised the Commission to work even harder, ensuring compliance with the laws that govern its operations and mandate.

Invitation to Join the Fight

The Integrity Commission is inviting all those who want a corruption free Jamaica, to join the fight against corruption - to not only support by mouthing words, genuine as the words may be, but to also take action to help in the fight. Action includes responding to enquiries that may expose corruption; passing pertinent legislation to establish relevant, helpful policies to combat corruption. Action means actively obeying the law without trying to invent spurious exceptions and without sacrificing honesty at the altar of convenience. The fight against corruption must be ongoing.

Encouraging voices are appreciated but perhaps more useful would be all hands being on deck. A change, resulting in significant reduction in the level of corruption in our country is possible and indeed it can be closer than we dare to dream.

Former USA President Barack Obama once opined that,

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“Change will not come if we wait for some other person or some other time. We are the ones we’ve been waiting for. We are the change that we seek.”

Let us unite around our cause for a corruption free Jamaica. Let us be the change we seek, remembering that the time is always right to do what is right.

The Hon. Ms. Justice (Ret’d.) Carol Lawrence Beswick, CD
Chairman

Former Chairman's Remarks

This is my final annual message as Chairman of the Integrity Commission. It has been a great honour and privilege to have served on Jamaica's first comprehensive Integrity Commission for the past seven years, during six of which I was the Chairman. As a very proud Jamaican who is, and always has been, committed to serving the public and the public interest, I am very pleased with the work of the Commission, not just over the past year, but for the entire period that it has been in existence.

The law establishing the Commission came into effect in 2018. It bears reminding that the law mandated that the staff that had been employed to the three legacy bodies were to be kept on for six months only, and then new staff were to be recruited. It meant that the Commission commenced operation without a settled structure and staff complement. The newly appointed Commissioners had to devise the structure, then seek the approval of the Ministry of Finance and Parliament for the Commission to become operational. We engaged Colonel Daniel Pryce, OD, on an interim basis as Executive Director. He assisted in getting the Commission off the ground. In the meantime, the Commission – in its unsettled state – came under intense pressure to complete and present to Parliament reports that had been in train under the legacy bodies. It was not an easy time.

It was not until May 2020 that the Commission was able to appoint an Executive Director, in the form of Mr. Greg Christie, who helped greatly in the finalization of the structure and with the recruitment of middle and junior staff. Currently, there is a problem with the Commission's ability to recruit staff at a certain level as recent upgrading in the public service has left the Commission behind. It has also resulted in the departure of some members of staff.

The Integrity Commission is a Commission of Parliament. It is a body that should receive the support of all members of the legislature and other public officers. After all, it is established to promote ethical conduct and good honest governance by all public officers. The law requires the filing of declarations of income and assets by such officers, and the Commission has insisted on compliance with the provisions of the law. In the early days of my chairmanship, I made it clear that it would not be business as usual, in that the Commission would not tolerate defiance of the law by public officers. There was some resistance, but I am happy to report that most public officers are now cooperating with the Commission. There is an appreciation that all stable democracies are based on compliance with the laws and conventions relating to integrity in public life.

I am very pleased with the performance of the staff of the Commission over the years, notwithstanding the threats and personal abuse that have been levelled at all of us. They have proven that they are committed to good governance in Jamaica.

Most public officers have been cooperating with the efforts of the Commission to fulfil its mandate. However, it has to be said, if the truth is to be told, that some members of the legislature who are part of the governing party have

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adopted an antagonistic stance towards the Commission to the point where they have regularly made false statements inside and outside the Parliament while libelling Commissioners and staff members. One female legislator went to the extreme of using an anti-social media platform to post images of members of the Commission and attaching outright lies that many have interpreted as an invitation for us to be harmed. Even the youth arm of that party joined in attacking and libelling us. I regard this whole scenario as shameful.

The actions of some legislators have really surprised and disappointed me.

The Commission had good reason to write to the Speaker in respect of the unethical conduct of a Member of Parliament. To date, that letter has not been acknowledged. Given the reason for the letter being written, it is surprising that the individual remains a member of the Parliamentary Committee that has oversight of the Integrity Commission. Not only has he remained a member, but he also seems to have assumed the lead role in the effort to dismantle the Commission by removing the Auditor-General and altering the qualifications for membership of the Commission. The Commission would then suffer the fate of the Political Ombudsman. The Committee seems to be prepared to dismiss the views of the Solicitor-General on the matter.

The practice of not acknowledging letters seems to have been copied by the Financial Secretary who has ignored at least two letters sent to her by the Commission. That's not appropriate behaviour by a civil servant, especially one so highly placed.

In the Senate, the President seems to have misinterpreted his role. As the appointed leader there, instead of encouraging compliance with the requirements of the Integrity Commission Act, he regularly displayed hostility towards the Commission and on occasion was heard on radio calling for the resignation of the Commissioners and officers. He seemed to have been offended by the fact that the Commission was submitting reports that called into question the conduct of some public officers.

In closing, I wish to remind all public officers of the oath that they took on assuming office. They should always be conscious of the fact that their duty is not to a sector, group, party or individual. Their duty is to Jamaica, and their actions must be always in the best interest of the country. There should be no compromise when it comes to ethical conduct, and integrity in public life.

The Hon. Mr. Justice (Ret'd) Seymour Panton, OJ, CD
Former Chairman

Executive Director's Remarks

Introduction

These will be my final Remarks in my capacity as the Executive Director of the Integrity Commission, now that my statutory term in office is at an end.

It has been an extraordinary privilege for me to have served in this pioneering role over the past 5 years—ending on May 17, 2025—a period that has been defined by institutional consolidation and transformation, foundational change, and significant challenge for our national Integrity Commission, which is still just 7 years young.

In the circumstances, I will use this opportunity to outline key aspects of the transformation of the Commission which have taken place during my time in office, as well as to record my views on some of the important work that lies ahead for Jamaica on the issue of anti-corruption.

That aside, you will find that the Commission's 2024/2025 Annual Report will provide you with a comprehensive and informative account of the work of the Commission, across all of its Organs, Divisions and Units, during the course of the Reporting Year. It is my hope, therefore, that you will be able to read it.

Mandate to Secure Institutional Consolidation

Our foundation mandate from the outset—7 years ago—though clear, was formidable. Our mission was bold. It was to consolidate and unify the work of 3 former, but disparate, anti-corruption bodies: the Office of the Contractor General, the Corruption Prevention Commission, and the Parliament Integrity Commission. We were tasked with bringing them together to form a single, independent national anti-corruption agency for Jamaica.

Beyond this, we were also charged with establishing an institution that would have expanded powers and a broader anti-corruption mandate, including criminal prosecutorial authority.

Importantly, our mandate was circumscribed by the provisions of the 2017 Integrity Commission Act. These, in turn, dictated the parameters for our work.

Key Transformation Steps Implemented Over the Past 5 Years

Today, I can confidently state that the mission is no longer aspirational. It has been substantively accomplished. The Commission is now an institutional and operating reality. Its development was born out of several decisive and

deliberate foundation steps, many of which were undertaken within the past 5 years—commencing May/June 2020—and which are listed below as follows:

- (1) The recruitment and appointment of the Commission's substantive Executive Director and all but 1 of its 4 substantive Statutory Directors. The Commission's Executive Director was appointed effective May 2020, its Director of Investigation effective May 2020, its Director of Information and Complaints effective July 2020, and its Director of Corruption Prevention, effective May 2021. The Commission's 4th Statutory Director—its Director of Corruption Prosecution—was previously appointed, effective April 2020. She had been seconded to the Commission, from the Office of the Director of Public Prosecutions, in December 2019.
- (2) The decision was made to retain, within the consolidated Commission, all of the then existing Officers of the 3 legacy institutions. This was done as opposed to making them redundant. The Officers, who were then on temporary 6-month employment contracts, were transitioned to 1-year contracts, and then to a renewable 3-year employment contract platform with the Commission.
- (3) A comprehensive gap analysis was undertaken by the Commission to evaluate whether its then organization structure, inclusive of its human resources and all job positions and job functions, was adequate to enable it to discharge its statutory mandates effectively and cost-efficiently. The findings were then used to inform the redesign of the Commission's organization structure to ensure that it was 'fit for purpose.' Among other things, the findings led to the expansion and strengthening of the Commission's approved head-count from 132 to 178 Officers, and to the establishment of 1 new Statutory Division as well as several new organizational units, functions and positions.
- (4) Following from the foregoing, a major and ongoing campaign was then initiated by the Commission to attract, recruit, train and retain the best talent possible, but within the limits that are prescribed by the Ministry of Finance and the Public Service, and the Parliament.
- (5) As was indicated, following from the gap analysis, a 4th Statutory Division of the Commission—the Corruption Prevention, Stakeholder Engagement, and Anti-Corruption Strategy Division—was established. Among other things, the Division subsequently developed and launched a focused public education campaign to promote integrity, prevent corruption, and encourage good governance. The Division's programme of work is designed to actively discourage and deter corrupt practices in Jamaica, and to coordinate the implementation of a national anti-corruption strategy.
- (6) The development and implementation of specific anti-corruption mechanisms and processes in all of the Commission's Statutory Divisions, but particularly in its Information and Complaints Division. This

undertaking is necessarily a work-in-progress. Anti-corruption measures must always be fluid if they are to effectively stay ahead of the ever-changing nature of corruption, bribery and white collar crime.

- (7) Several best-practice and corporate governance standards were developed and established across the Commission. A broad range of administrative, human resource, policy, procedural, and operational processes and frameworks—deemed essential to guide and support the work, mandates, and the various organs of the Commission—were also developed and implemented. Many of these, of necessity, are subject to continuing review.
- (8) The lease, establishment and outfitting of new offices for the Commission to accommodate its expanded staff complement, and to provide them with a modern and ergonomic work environment that fosters productivity and comfort.
- (9) The acquisition, installation and deployment of modern information, communication and technology systems and devices to facilitate greater efficiency, automation and effectiveness in the operations of the Commission and the work of its Officers.
- (10) The development and implementation of a wide range of policies and mechanisms that are designed to secure the confidentiality and secrecy of the Commission's sensitive documentation, files and electronic data.
- (11) Last, but by no means least, the implementation of stringent security measures at the Commission's 2 offices, as well as at offsite locations, to ensure the safety, security and protection of its Officers.

In the pursuit of a number of these transformative objectives, and not unexpectedly, the Commission was confronted with challenges. Among them were legislative complexities, resource constraints, bureaucratic headwinds and, of course, the inherent challenge of prosecuting change itself. Happily, however, we prevailed such that all of the critical structural and operating mechanisms, for the mandated consolidated Commission, are now substantially in place.

Need for Strengthening of the Integrity Commission's Legislative Framework

Despite the foregoing achievements, the developmental work of the Commission, in so far as its enabling mechanisms are concerned—it being a creature of law—is not over.

The primary legislative framework that governs the Commission's operations—the Integrity Commission Act—is inadequate and weak in a number of respects.

Consequently, if the Commission is to realize its full potential, the Act must be purposefully reviewed and revised with the objective of strengthening the Commission's operational effectiveness and independence. The benchmark to be utilized should be the full gamut of recognized international best practices in anti-corruption and anti-bribery.

These should include the prescriptions of the 1996 OAS Inter-American Convention Against Corruption (IACAC), and the 2005 United Nations Convention Against Corruption (UNCAC). Jamaica is a State Party to both treaties and perhaps it would do us good to see how many of the boxes we have in fact ticked in so far as our compliance with our international treaty obligations are concerned.

Other major anti-corruption prescriptions of broad application, such as the 2012 Jakarta Statement on the Principles for Anti-Corruption Agencies, as well as specialized anti-corruption concepts, such as the UK Bribery Act, and the UK's Unexplained Wealth Order (UWO), should also be embraced or modeled.

The Commission has already submitted several remedial recommendations to the Joint Select Committee of Parliament that was established to review the Integrity Commission Act. However, it is yet to be seen what their outcomes will be. Be that as it may, and as was previously stated, effective anti-corruption is not a static mechanism. It has to be fluid and, above all, responsive.

The Integrity Commission Act should also be reviewed to ensure that its provisions are unequivocal in meaning and intent. The Act has a number of ambiguities and inherent conflicts—both patent and latent—thus rendering its interpretation, application and enforcement, uncertain, unreliable and problematic.

The entire issue of reform is concerning. It requires urgent, sober, impartial and decisive address. This is more-so since indications are that the country is currently moving in the direction of weakening the Integrity Commission Act, rather than strengthening it.

We cannot effectively fight the ever-increasing sophistication of 21st-century corruption and bribery with weakened anti-corruption laws, deliberately blunted tools, or legislative instruments that are unclear or conflicted in meaning.

Anti-Corruption Institutional Independence - Other Considerations

In keeping with, among other things, Jamaica's international anti-corruption treaty obligations, a strengthened and independent Integrity Commission must also mean having a Commission that is vested with the capability to hire and competitively compensate competent professionals, whether drawn from the public or the private sector.

However, and as is documented elsewhere in this Annual Report, Jamaica's Integrity Commission has been experiencing significant and prolonged difficulties in hiring and/or retaining competent staff due primarily to its uncompetitive compensation rates.

Also, closely aligned with the imperative of anti-corruption institutional independence, is ensuring that the appointment, tenure and decisions of the leadership of national anti-corruption bodies are effectively insulated from political interference and adverse external manipulation.

Importance of a Strong and Independent National Integrity Commission

A strong and independent national anti-corruption institution, anchored in a sound legislative framework, is the bedrock of good governance in any society. This is especially so in emerging economies where some or all of the following are commonplace:

- (a) integrity systems are weak;
- (b) ethical leadership is wanting;
- (c) public offices are routinely subjected to abuse;
- (d) corruption is taken lightly;
- (e) bribery is prevalent;
- (f) poverty is rife;
- (g) essential public resources and services are inadequate or are out of the reach of many;
- (h) national institutions are still maturing; and
- (i) there is a perception of 2 laws: one for the connected or privileged—which is seldom enforced—and the other for everyone else.

In such circumstances, insisting upon good governance, transparency, and integrity in leadership, and seeking to hold offending public officials accountable, are not luxuries. To the contrary, they are fundamental necessities for national socio-economic development, equality in treatment, and the protection of democratic freedoms.

Indeed, these are the primary considerations that should inspire and propel the governance aspirations of any nation. Should we in Jamaica fail to heed the call, then we must be prepared to face the painful consequences of regret when the devastating impact of unchecked corruption spreads across the entire society—as it inevitably will.

Acknowledgement of the Commission's Officers and Board

In closing, I would like to convey a few words of gratitude.

First, to the Officers of the Commission—dedicated, principled, and unwavering—I publicly offer my sincere and heartfelt appreciation. You have stood firm and tall in the face of adversity. You have resisted cynicism, ridicule and even threats to your safety. And, in so doing, you have embraced the demanding and often thankless work of integrity enforcement.

Your commitment to the Commission's mission has been the engine behind its accomplishments. In essence, you have brought the Commission's mandates to life. You have truly answered the call to public service with integrity and I am proud to have worked alongside you.

I urge you to continue to be bold and fearless, but always fair, impartial and principled in your work. Be guided primarily by your sense of integrity, your oath of office to serve the public interest, and the rule of law.

Remember, your work matters. It shapes the culture of accountability in our society and it protects the public interest and resources from abuse, corrosion and compromise. All right-thinking Jamaicans support you and are counting on you!

The Board of Commissioners must also be acknowledged. Its steadfast guidance, counsel and support have been invaluable and indispensable to the Commission's development, independence, and strength, in its formative years.

I am particularly honored to have held office as Executive Director under the stewardship of the Commission's 2nd and 3rd Chairpersons—the Hon. Mr. Justice (Ret'd) Seymour Panton and the Hon. Mrs. Justice (Ret'd) Carol Lawrence-Beswick, respectively. Both Chairmen have served the Commission and their country with distinction and with unmitigated resolve.

I must also publicly record my gratitude to the Board for the confidence and trust that it reposed in me throughout the entirety of my 5-year statutory tenure as Executive Director.

I was especially moved when, more recently, I was invited by it to consider remaining in office for a further term—an offer which, regrettably, I had to respectfully decline because of my conviction that it was time for me to pass the baton.

Expression of my Gratitude

Finally, I must say that it was the privilege of a lifetime to have served in the capacity of the 1st substantive Executive Director of Jamaica's Integrity Commission. This is more-so after having completed 7 years of service, in national anti-corruption institutional leadership, as Jamaica's 4th Contractor General.

To have been entrusted with the responsibility of helping to establish the foundations of this critical national institution, and to lead its administrative transformation and operationalization over the past 5 years, have been both an honour and a humbling duty for me. For this, I am profoundly grateful.

Greg Christie
Executive Director

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Chapter 2 - Executive Summary

EXECUTIVE SUMMARY

The Integrity Commission (the Commission) remained committed to its mandate during the financial year, ended March 31, 2025, forging ahead with its anti-corruption and operational activities. The 2024-2025 fiscal year can be described as a fairly moderate year with balanced opportunities and challenges that the Commission had to capitalise on, and address respectively, in the undertaking of its objectives across all business activities.

Corporate Governance

Pursuant to Section 8 of the Integrity Commission Act, 2017, the Commission operates under the leadership of Commissioners who are assigned roles in accordance with the Act and who collectively provide governance and oversight.

In the performance of its functions under Section 25 of the Act, the Commission, during the reporting period, convened 20 meetings of the Commissioners, 10 Audit, Finance and Technology Committee meetings, 12 Corruption Prevention Committee meetings, 5 Human Resource and Corporate Governance Committee meetings, 17 Information and Complaints Committee meetings, and 13 Investigations and Corruption Prosecutions Committee meetings.

At the executive level, a total of 9 Statutory Directors meetings and 9 Leadership Meetings were convened during the reporting period.

Towards the latter part of the reporting period, in keeping with the terms and duration of their appointment, the Hon. Mr. Justice (Ret'd) Seymour Panton, OJ, CD (former Chairman) and Mr. Eric Crawford, CD (former Commissioner) demitted Office on February 25, 2025, having completed seven years as appointed Commissioners.

The Commission welcomed the appointment of the Hon. Mrs. Justice (Ret'd) Carol Lawrence-Beswick, CD (Chairman) and Commissioner, the Hon. Mr. Brian Wynter, OJ, CD, as at February 26, 2025.

Anti-Corruption Activities

Statutory Declarations: The Commission, at the end of the reporting period, March 31, 2025, recorded a 76% compliance rate for public officials and an 81% compliance rate for Parliamentarians, with respect to the requirement to file a Statutory Declaration. During the reporting period, the Commission examined 11,763 Statutory Declarations, this being, more than eight times that which was examined in the previous period. The Commission

also certified 1,874 of those Statutory Declarations, 886 more than the previous period. 6 public officials were referred for investigation.

Additionally, the Commission as at March 31, 2025, completed the examination of all sitting Parliamentarians' Statutory Declarations for the period 2018 – 2023, save for the Parliamentarians' Statutory Declarations that were referred for Investigation.

Complaints and Information: For the period under review, 204 complaints and information were received by the Commission, of which 60 complaints were referred to the Director of Investigation, 193 were closed, and 4 matters are being kept-in-view.

Protected Disclosures: During the reporting period, 175 or 98% of Public Bodies submitted Protected Disclosures Procedural Guidelines. Also, during the year, 8 Protected Disclosures were received by Public Sector Entities whilst 13 were received by the Integrity Commission, whilst facilitating 104 Protected Disclosures Sessions during the year with Public Entities.

In addition, and most importantly, the Designated Authority and Public Bodies have received an aggregate of 70 Protected Disclosures over the period of 2021/2022 to 2024/2025. This provides a sufficient basis to conclude that Employees are willing to utilize the established mechanisms to make disclosures.

Electronic Declaration System (eDS): The Commission, during the reporting period, continued efforts to implement the Electronic Declaration System (eDS), however, due to the need to amend the Integrity Commission Act, the launch had to be postponed. By way of letter to the Clerk to the Houses of Parliament and copied to the Chairman of the Joint Select Committee reviewing the Integrity Commission Act, the Commission recommended that the Committee consider the proposal to make the necessary amendments to the Integrity Commission Act, to facilitate electronic filing.

Investigation Function: The Investigation Division continues to function with 50% of its investigators, this has resulted in a high case to investigator ratio. Notwithstanding, the Division has, up to March 31, 2025, completed over 90% of all complaints and referrals received. Furthermore, over the last 5 financial years, 134 matters were referred to the Director of Corruption Prosecution for consideration, a decision to charge was returned in 130 or 97% of these matters. All matters concluded in the Courts so far, have resulted in convictions or guilty pleas. This represents a 100% conviction rate.

Declarations and Financial Investigations and Contract, Procurement & Corruption Investigations: For the reporting period 2024/2025, the Investigation Division received 71 complaints/referrals, this number includes referrals from the Director of Information and Complaints and matters commenced on the Director of Investigation's initiative. A

total of 41 complaints were resolved, 9 of which were tabled in the Houses of Parliament. 4 of the 9 matters tabled were referred to the Director of Corruption Prosecution for consideration. 32 matters were closed on Preliminary Enquiries pursuant to Section 47 of the Integrity Commission Act.

Monitoring Function: A total of 1,676 matters were monitored during the reporting period. This represents a modest 6% increase over the preceding financial year and an overall increase of 41.5% between financial year 2020/2021 and the last financial year 2024/2025.

Contract Monitoring: A total of 1187 (655 construction contracts and 532 non-construction contracts) with a cumulative value of J\$175.5B and US\$802M were monitored during the reporting period. During the same period, the Contract Monitoring Inspectors made a total of 657 site visits, this includes site meetings and other verification exercises.

The compliance rate for the Quarterly Contracts Award Report (QCAR) for the current financial year was 99% while that for the Annual Contracts Cost Overruns and Variations Report (ACCOVR) was 94.5%.

Licencing Asset Divestment/Acquisition (LADA): A total of 489 LADA matters inclusive licences and permits, public private partnerships and asset divestment projects were monitored for the period 2024-2025.

Corruption Prosecution: For the reporting period, a total of 4 referrals were made to the Corruption Prosecution Division. Of the 4 referrals referred, no charges were laid in 1 matter, 1 was returned to the Investigation Division for the file to be completed, and the other 2 matters were recommended for prosecution. Prosecution has since been initiated in both of these matters and they are ongoing as at the close of the period.

Overall, a total of 10 matters were concluded during the reporting period with 8 convictions recorded for offences concerning failure to file Statutory Declarations while the remaining 2 matters related to making a false Statement in a Statutory Declaration.

Corruption Prevention, Stakeholder Engagement and Anti-Corruption Strategy: During fiscal year 2024-2025, an estimated 2,360 individuals were exposed to the work of the Integrity Commission by virtue of either presentations or training interventions delivered by the Division under its *Anti-Corruption and Good Governance Workshops* and/or via presentations at conferences/retreats and other events and through its various stakeholder engagement sessions.

Operational Activities

The 2024-2025 fiscal year began with a staffing level of 123 employees. At the end of the fiscal year, the Commission's structure of 178 posts was at 77% of capacity with 137 employees, representing an increase of 11% over the previous year's complement.

During the reporting period, the Commission successfully recruited 31 Fixed-Term Contract (FTC) employees, whilst there were 17 FTC separations from the organization. The rate of separation continues to be a cause of concern within the Commission, as the cost of finding new employees, plus the training costs and time to equip and deploy them to the productive workforce is negatively impacting the effectiveness and efficiency of the organization.

The Turnover Rate of FTC employees for the 2024-2025 reporting period was 12% representing a 3% reduction over the previous year.

As it relates to its Training & Development Programme, the organization continued to build the capacity and competency of its employees. At the end of the reporting period, 355 participants completed 68 training programmes with an overall cost of approximately \$17.7M.

The Commission, during the reporting period, also developed and implemented its communication and awareness strategy to heighten its public education, awareness, and engagement programmes. These programmes were designed to effectively enhance the public perception on anti-corruption matters, and to provide and promote clear and consistent public information and communication utilizing various communication platforms and media.

In keeping with the Data Protection Act, the re-registration of the Data Controller with the Office of the Information Commissioner was undertaken during the reporting period. Additionally, the Commission, during the period, continued to structure and strengthen its data protection initiatives throughout the organization with training and workshops for all business units to ensure data security, mitigate risks, and prevent breaches.

During the 2024-2025 period, the Commission bolstered its ICT environment from cyber-attacks both internally and externally, by, conducting network penetration scans, remediating the vulnerabilities found, upgrading the ICT infrastructure and increasing the end-user cybersecurity awareness training participation. These projects had a positive impact on the organization's efficiency while embracing emerging and effective business processes to streamline operations, enhance communication and drive value towards achieving its mandate.

As it relates to Court Proceedings, the Commission, during the reporting year, continued to pursue 5 legal matters which were before the Courts, involving the Commission directly, or in relation to legacy entities.

Financial Performance

The Commission's approved Estimates of Expenditure for the 2024-2025 fiscal year, was \$1.827 Billion, this included \$41.6 Million for Statutory Expenditure, and \$65.307 Million from the United Kingdom Foreign, Commonwealth & Development Office (FCDO) Donor Fund.

During the year, of the approved budget, a total of \$1.759B in Warrant was allocated to the Commission, of which total expenditure amounted to \$1.669B. At the end of the reporting period the percentage utilisation of the approved budget and warrant was 95% and 96% respectively.

The Audited Financial Statements of the Commission, appended to this report, have been prepared in accordance with International Financial Reporting Standards (IFRS), as mandated by the Integrity Commission Act.

OUTLOOK

The Commission, in the short to medium-term, intends to increase and improve its anti-corruption and operational initiatives, its responsiveness and commitment in continuing to focus on its 4 strategic objectives for the upcoming period.

The Commission will continue to recruit and onboard competent employees to enhance the execution of its functions, via the stated strategic objectives and priorities for the upcoming period which are:

1. Establish a culture of results-based performance.
2. Expand the Commission's public sensitization and engagement programme.
3. Strengthen public bodies' awareness and compliance with the Commission's policies and regulations, by increasing outreach initiatives.
4. Improve the Commission's responsiveness to complaints, notifications and reports.

Chapter 3 - Governance Structure

Governance Structure

The Integrity Commission is headed by the Commissioners who are responsible for the governance and oversight of the Integrity Commission, pursuant to the requirements of the Act.

Section 5(4) of the Integrity Commission Act, 2017, provides as follows:

“The Commission shall –

- (a) subject to sections 34(3) and 36(4), be ultimately responsible and accountable to Parliament for all matters relating to the functions of the Commission[sic]; and*
- (b) monitor and report to Parliament on the operation and effectiveness of the provisions of this Act.”*

Section 8(1) of the Integrity Commission Act, 2017, which is detailed hereunder, provides particulars of the constitution of the Commission and the persons who may be appointed to hold such an appointment, as a Commissioner.

8. - (1) Pursuant to section 5 and subject to subsection (3), the Commission shall consist of the following persons appointed as Commissioners —

- (a) the Auditor-General;*
- (b) four other persons (hereinafter referred to as “appointed Commissioners”) appointed by the Governor-General, by instrument in writing, after consultation with the Prime Minister and the Leader of the Opposition, from any of the following categories of persons—*
 - i. retired Judges of the Court of Appeal or retired Judges of the Supreme Court, from which two persons shall be appointed;*
 - ii. senior retired public officials with knowledge and expertise in the area of finance, accounting or public administration;*
 - iii. persons who represent non-governmental organizations that appear to be well established*

In this regard, the Commission, as at March 31, 2025, is currently composed of the following members:

1. The Hon. Mrs. Justice (Ret'd) Carol Lawrence-Beswick, CD (Chairman) - as at February 26, 2025
2. Mrs. Pamela Monroe Ellis, FCCA, CA
3. The Hon. Mr. Justice (Ret'd) Lloyd Hibbert, CD, KC.
4. The Hon. Mr. Brian Wynter, OJ, CD – as at February 26, 2025
5. Mr. H. Wayne Powell, O.D., J.P.

INTEGRITY COMMISSION

In keeping with the terms and duration of their appointment, the Hon. Mr. Justice (Ret'd) Seymour Panton, OJ, CD (former Chairman) and Mr. Eric Crawford, CD (former Commissioner) demitted Office on February 25, 2025, having completed seven years as appointed Commissioners.

In the performance of its functions under the Act, the Commission, pursuant to Section 25 of the Act, has established several Committees through which oversight is provided. Detailed, on the following page, are particulars of each Committee, inclusive of their membership and the number of meetings convened.

INTEGRITY COMMISSION

INTEGRITY COMMISSION COMMITTEES AND MEMBERS

COMMISSION MEETINGS

Standing Members:

The Hon. Ms. Justice (Ret'd) Carol Lawrence-Beswick, CD (Chairman) - as at February 26, 2025
The Hon. Mr. Justice (Ret'd) Seymour Panton, OJ, CD (Former Chairman) - (April 2024- February 25, 2025)

The Hon. Mr. Justice (Ret'd) Lloyd Hibbert, CD, KC (Commissioner)
Mrs. Pamela Monroe-Ellis, FCCA, CA (Commissioner)
Mr. Eric Crawford, CD (Former Commissioner) - (April 2024- February 25, 2025)
The Hon. Mr. Brian Wynter, OJ, CD (Commissioner) – as at February 26, 2025
Mr. H. Wayne Powell, OD, JP (Commissioner)

Executive Director

Meeting Schedule	The 1 st Monday of every month or as required.
No. of Meetings convened for the Reporting Period	20

AUDIT, FINANCE & TECHNOLOGY COMMITTEE

Standing Members:

The Hon. Mr. Brian Wynter, OJ, CD (Committee Chair) – as at February 26, 2025
Mr. Eric Crawford, CD (Former Committee Chair) - (April 2024 - February 25, 2025)
Mrs. Pamela Monroe-Ellis, FCCA, CA
Mr. H. Wayne Powell, OD, JP

Executive Director
Director of Finance & Accounts
Director of Information Technology & Business Processes
Director of Corporate Services
Chief Audit Executive

Meeting Schedule	The 3 rd Tuesday of every month or as required.
No. of Meetings convened for the Reporting Period	10

CORRUPTION PREVENTION, STAKEHOLDER ENGAGEMENT & ANTI-CORRUPTION STRATEGY COMMITTEE

Standing Members:

The Hon. Ms. Justice (Ret'd) Carol Lawrence-Beswick, CD (Chairman) - as at February 26, 2025
 The Hon. Mr. Justice (Ret'd) Seymour Panton, OJ, CD (Former Chairman) - (April 2024 - February 25, 2025)
 The Hon. Mr. Justice (Ret'd) Lloyd Hibbert, CD, KC
 Mr. H. Wayne Powell, OD, JP
 The Hon. Mr. Brian Wynter, OJ, CD - as at February 26, 2025
 Mr. Greg Christie, Executive Director

Director of Corruption Prevention, Stakeholder Engagement & Anti-corruption Strategy

Meeting Schedule	The 3 rd Monday of every month or as required.
No. of Meetings convened for the Reporting Period	12

HUMAN RESOURCE & CORPORATE GOVERNANCE COMMITTEE

Standing Members:

Mrs. Pamela Monroe-Ellis, FCCA, CA (Committee Chair, Human Resource Component)
 Mr. H. Wayne Powell, OD, JP (Committee Chair, Corporate Governance Component)
 The Hon. Mr. Justice (Ret'd) Lloyd Hibbert, CD, KC

Executive Director
Director of Corporate Services
Manager of Human Resources

Meeting Schedule	The 4 th Friday of every month or as required.
No. of Meetings convened for the Reporting Period	5

INFORMATION & COMPLAINTS COMMITTEE

Standing Members:

Mrs. Pamela Monroe-Ellis, FCCA, CA (Committee Chair)
The Hon. Mr. Justice (Ret'd) Seymour Panton, OJ, CD - (April 2024 - February 25, 2025)
Mr. Eric Crawford, CD - (April 2024- February 25, 2025)
The Hon. Ms. Justice (Ret'd) Carol Lawrence-Beswick, CD - as at February 26, 2025
Mr. H. Wayne Powell, OD, JP - as at March 2025

Director of Information & Complaints

Meeting Schedule	The 3 rd Wednesday of every month or as required, and the 4 th Thursday of every month or as required
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No. of Meetings convened for the Reporting Period	17
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INVESTIGATION & CORRUPTION PROSECUTION COMMITTEE

Standing Members:

The Hon. Mr. Justice (Ret'd) Lloyd Hibbert, CD, KC – (Committee Chair)
The Hon. Mr. Justice (Ret'd) Seymour Panton, OJ, CD - (April 2024 - February 25, 2025)
Mr. Eric Crawford, CD - (April 2024 - February 25, 2025)
The Hon. Ms. Justice (Ret'd) Carol Lawrence-Beswick, CD - as at February 26, 2025
The Hon. Mr. Brian Wynter, OJ, CD - as at February 26, 2025

Director of Investigation
Director of Corruption Prosecution

Meeting Schedule	The 2 nd Friday of every month or as required.
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No. of Meetings convened for the Reporting Period	13
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STATUTORY DIRECTORS' / EXECUTIVE DIRECTOR'S LEADERSHIP COMMITTEE

Standing Members:

Executive Director (Committee Chair)
Director of Investigation
Director of Corruption Prosecution
Director of Information and Complaints
Director of Corruption Prevention, Stakeholder Engagement & Anti-corruption Strategy

Meeting Schedule	The 2 nd Wednesday of every month or otherwise as may be determined
No. of Meetings convened for the Reporting Period	9

STATUTORY DIRECTORS' MEETINGS/ INTERDIVISIONAL LEADERSHIP COMMITTEE

Standing Members:

Director of Investigation
Director of Corruption Prosecution
Director of Information and Complaints
Director of Corruption Prevention, Stakeholder Engagement & Anti-corruption Strategy
(Rotating Chairmanship)

Meeting Schedule	The last Friday of every month or otherwise as may be determined
No. of Meetings convened for the Reporting Period	4

INTEGRITY COMMISSION

LEADERSHIP TEAM COMMITTEE

Standing Members:

Executive Director (Committee Chair)
Director of Investigation
Director of Corruption Prosecution
Director of Information and Complaints
Director of Corruption Prevention, Stakeholder Engagement & Anti-corruption Strategy
Director of Corporate Services
Director of Finance and Accounts
Director of Information Technology and Business Processes
Legal Counsel
Data Protection Officer
Communications Officer
Chief Accountant
Project Manager, Integrity Commission/Sagicor Relocation Project

Meeting Schedule	The 2nd Wednesday of every month or otherwise as may be determined
No. of Meetings convened for the Reporting Period	9

STAFF MEETINGS

Executive Director (Co-Chair)
Director of Corporate Services (Co-Chair)

Meeting Schedule	Quarterly
No. of Meetings convened for the Reporting Period	3

Chapter 4 - Statutory Requirements for Content of the Annual Report

INTEGRITY COMMISSION

The Integrity Commission, in the preparation and publication of its Annual Report, is bound by the requirements of the law regarding its content and the information which can be made available in the referenced Report. Specifically, Section 36 (2) of the Integrity Commission Act, 2017, provides as follows:

“The Commission shall, not later than three months after the end of each financial year, or within such longer period as the Parliament may approve, submit to Parliament an annual report relating generally to the execution of the functions of the Commission during the preceding financial year, which shall contain the information set out in the Second Schedule.”

Detailed below is the verbatim content of the Second Schedule of the Integrity Commission Act and to which the substance of the Commission’s Annual Report is aligned.

SECOND SCHEDULE (Section 36(2))

Contents of Annual Report of Commission

1. *A general description of the matters that were referred to the Commission.*
2. *Subject to section 53(3), a general description of the matters investigated by the Commission.*
3. *The following details with respect to matters investigated by the Commission—*
 - a. the number of investigations commenced but not finally dealt with during the financial year in question;*
 - b. the average time taken to deal with complaints and the actual time taken to investigate any matter in respect of which a report is made.*
4. *Any recommendations for changes in the laws of Jamaica, or for administrative action, that the Commission considers should be made as a result of the exercise of its functions.*
5. *The general nature and extent of any information submitted under this Act by the Commission during the year to the Security Forces or any other public body.*
6. *The number of matters investigated by the Commission which have resulted in prosecutions or disciplinary action in that year.*
7. *A description of its activities during that year in relation to any of its functions.*

INTEGRITY COMMISSION

8. *The number of convictions and acquittals, and where a charge is laid the time taken to dispose of each matter.*
9. *Such other information as the Commission thinks relevant; however, no details shall be provided by the Commission in relation to any matter under investigation by the Director of Investigation or for which criminal proceedings have been instituted by the Director of Corruption Prosecution.*
10. *The audited financial statements of the Commission for the financial year.*

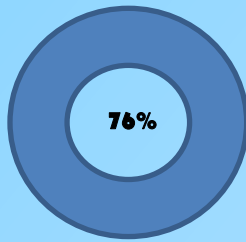
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Chapter 5 - Information and Complaints Division

INFORMATION AND COMPLAINTS DIVISION

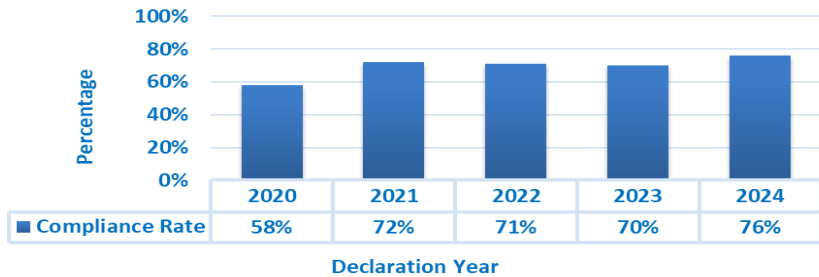
Statutory Declarations - Compliance

Current Reporting Period
As at March 31st, 2025



Five Year Comparison

Compliance Rate of Statutory Declarations
Received as at March 31st

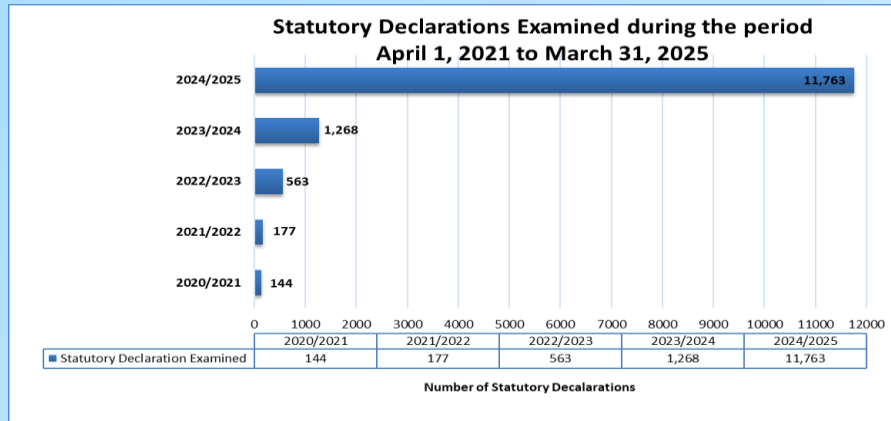


Statutory Declarations (SDs) - Examination

Current Reporting Period
As at March 31st, 2025

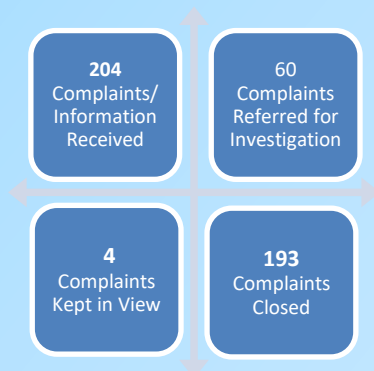


Examination of Statutory Declarations: 2020/2021 to 2024/2025



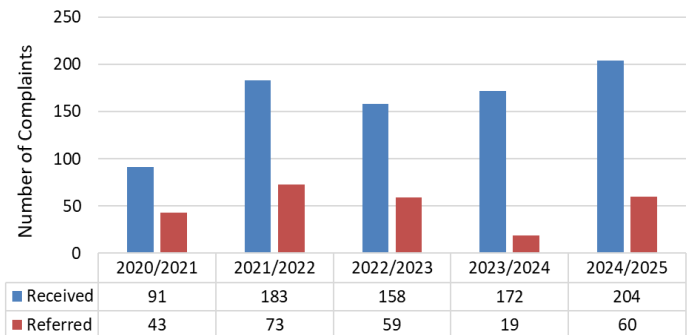
Complaints Management

Current Reporting Period
As at March 31st, 2025



Five Year Comparison

Number of Complaints/Information Received and Referred for
Investigation: April 1, 2020 – March 31, 2025



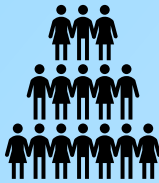
INFORMATION AND COMPLAINTS DIVISION

Protected Disclosures

	Number of Public Bodies that submitted Protected Disclosures Procedural Guidelines	Number of Protected Disclosures Received by Public Sector Entities	Number of Protected Disclosures Received by the Integrity Commission
2021/2022	16 [9%]	1	4
2022/2023	149 [81%]	6	7
2023/2024	169 [94%]	11	20
2024/2025	175 [98%]	8	13

Human Resource

Human Resource



100%
[28 Staff Members as at March 31, 2025]

Office of the Director of Information and Complaints	Complaints and Protected Disclosures Unit	Declarations Unit	Financial Analysis Unit
Director of Information and Complaints (1 Filled)	Manager of Complaints and Protected Disclosures (1 Filled)	Manager of Declarations (1 Filled)	Manager of Financial Analysis (1 Filled)
Reporting and Compliance Officer (1 Filled)	Senior Complaints and Protected Disclosure Officer (1 Filled)	Senior Declarations Verification Officer (1 Filled)	Senior Financial Analyst (2 Filled)
Administrative Assistant to the Director of Information and Complaints (1 Filled)	Complaints and Protected Disclosure Officer (6 Filled)	Declarations Verification Officer (5 Filled)	Financial Analyst (6 Filled)
Administrative Assistant to the Division (1 Filled)		Registry Officer (1 Filled) – <i>Corporate Services Division</i>	
		<u>Data Entry Project Initiative</u> – Temporary Data Entry Officers (12 Filled) [3 Vacant]	

Functions of the Director of Information and Complaints

Section 32(1) of the Integrity Commission Act, 2017, sets out the functions of the Director of Information and Complaints, who heads the Information and Complaints Division of the Integrity Commission. The referenced section provides that:

“The Director of Information and Complaints shall –

- a) receive, keep on record and examine all statutory declarations filed with the Commission;*
- b) make such enquiries as he considers necessary in order to certify or determine the accuracy of a statutory declaration;*
- c) receive and keep proper record of any complaint or information or notification in relation to any or all of the following matters:*
 - (i) any allegation which involves or may involve an act of corruption;*
 - (ii) any allegation regarding impropriety or irregularity with respect to the award, implementation or termination of a government contract or the grant, issue, suspension or revocation of a prescribed licence;*
 - (iii) any allegation in respect of non-compliance with any of the provisions of the Act;*
- d) refer to the appropriate Director, any complaint or information or notification received under paragraph (c), or any other matter, which he considers appropriate for action;*
- e) submit to the Executive Director, Quarterly reports on the activities of the Division; and*
- f) perform such other functions as may be assigned to him by or under this Act or any other enactment.”*

The Information and Complaints Committee

Pursuant to Section 25 of the Integrity Commission Act, 2017, a Committee of this Division was established. The Committee comprised of three (3) members of the Commission; Pamela Monroe-Ellis (Chair), Justice (Ret'd) Seymour Panton, Eric Crawford and the Director of Information and Complaints, Craig Beresford. However, on February 25, 2025, Justice Panton and Mr. Crawford demitted office as Chairman and Commissioner of the Integrity Commission. The two (2) new members of the Committee are Justice (Ret'd) Carol Beswick Lawrence and H. Wayne Powell.

The Terms of Reference of the Committee are to:

- (a) review complaints regarding allegations of impropriety as well as non-compliance with any provision of the Integrity Commission Act, 2017;

INTEGRITY COMMISSION

- (b) advise the Commission on matters of concern that it considers of significance and should be referred to the Director of Investigation; and
- (c) review the summary of Statutory Declaration for the Prime Minister and Leader of the Opposition, for gazette publication approval.

Information and Complaints Committee Meetings

For the period under review, seventeen (17) committee meetings were held, where important matters were considered and discussed. Some of the matters discussed were:

- a. Review of Net Worth Statements, and identifying resultant breaches of the Act, as well as potential cases of illicit enrichment, for further and necessary action;
- b. Examination of Parliamentarians' Statutory Declarations for the period 2018 to 2023;
- c. Certification of Statutory Declarations;
- d. Operationalising various modules of the Electronic Declaration System (eDS);
- e. Implementation of a revamped Examination Process to improve output;
- f. Statutory Declaration compliance;
- g. Third-Party Verification;
- h. Implementation of the Complaints and Protected Disclosures Management System (CPDMS);
- i. Operationalising the Protected Disclosures Act, 2011; and
- j. Complaints Referrals.

Information and Complaints Division's Objectives

The Director of Information and Complaints continues to pursue the five (5) broad objectives established in the Financial Year 2020/2021 and refined in 2024, with the aim to continue the strengthening of the Division's core functions:

1. Implementation of the Electronic Declarations System (eDS) to allow for ease of submission on the part of Public Officials and to facilitate a more efficient and effective means of examining Statutory Declarations;
2. Targeting the 100% compliance rate with respect to the submission of Statutory Declarations, by using a dual-pronged approach of engagement and enforcement;
3. Implementation of a mechanism which utilises technology to analyse 100% of Statutory Declarations received from Public Officials;
4. Revision of methodologies, approaches, processes and systems to ensure that 100% of the potential illicit enrichment and false information cases identified are referred; and
5. Establishment of a robust mechanism to report corruption, fully operationalising the Protected Disclosures Act, 2011 and creating an environment where complainants feel free to report allegations of corruption and non-compliance with the provisions of the Integrity Commission Act.

INTEGRITY COMMISSION

Information and Complaints Division Referrals

Referrals are made by the Director of Information and Complaints pursuant to Sections 38, 42(4) and 43 of the Integrity Commission Act, 2017, and in keeping with Sections 14 and 15 of the Corruption Prevention Act, 2001.

During the reporting period, the following referrals were made:

Complaints and Protected Disclosures Referred to the Investigation Division for the Financial Year 2024/2025

Allegation	Referrals
Reports on Allegations of Conflict of Interest, Corruption, Fraud, Impropriety, Contracts and Procurement Breaches – Pursuant to Section 38 of the Integrity Commission Act, 2017	55
Matters identified based on the Director of Information and Complaints' Discretion	5
Protected Disclosures Act, 2011	1

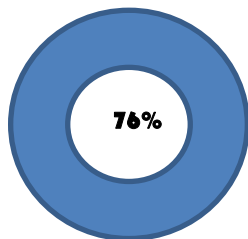
Offences under the Integrity Commission Act, 2017 and the Corruption Prevention Act, 2001 for the Financial Year April 1, 2024 to March 31, 2025

Offences	Parliamentarians	Public Officials
Failure to file a Statutory Declaration - Section 43 (1)(a) of the Integrity Commission, 2017:		
30 Days - Statutory Notice	-	-
Discharge of Liability	3	-
Prosecution	-	1
Failure to provide Information – Section 43 (1)(b) of the Integrity Commission Act, 2017:		
Discharge of Liability	1	2
Prosecution	2	-
Providing False Information – Section 43(2)(a) of the Integrity Commission Act, 2017 and Section 15(2) (b) of the Corruption Prevention Act, 2001:		
Investigation	2	4
Failure to honour opportunity to Discharge Liability - Section 43(3) of the Integrity Commission Act, 2017:		
Section 43 (1)(a) Offence - Prosecution	-	11
Section 43 (1)(b) Offence – Prosecution	-	1
Illicit Enrichment – Section 14 and 15 of the Corruption Prevention Act, 2001:		
Investigation	2	4
Other Referrals	-	-

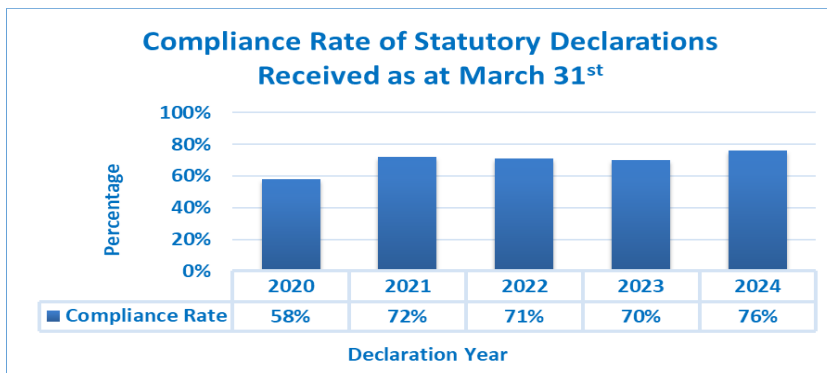
All Referrals are made to the Information and Complaints Committee by the Director of Information and Complaints regarding offences germane to Sections 42(4) and 43 of the Integrity Commission Act, 2017, and in keeping with Sections 14 and 15 of the Corruption Prevention Act, 2001.

Statutory Declarations - Compliance

Current Reporting Period
As at March 31st, 2025



Five Year Comparison



The Table below summarizes the Compliance rates for each declaration period from December 31, 2020 through to December 31, 2024:

Statutory Declaration Period Ended	Number of Declarants required to file Statutory Declarations	Number of Statutory Declarations received as at the relevant Declaration deadline March 31 st , each year	Compliance Rate
December 31, 2020	40,449	23,532	58%
December 31, 2021	40,347	29,207	72%
December 31, 2022	44,348	31,535	71%
December 31, 2023	22,523	15,848	70%
December 31, 2024	23,320	17,773	76%

The Division received one thousand, nine hundred and twenty-five (1,925) more Statutory Declarations as at March 31, 2025, a twelve percent (12%) increase, when compared to the prior period.

At the time of preparing this report, the Division received 19,980 (85%) of the Statutory Declarations that were required for the period ended December 31, 2024.

The Division will commence referrals for prosecutions for Public Officials with outstanding Statutory Declaration(s) in the first quarter of 2025/2026.

INTEGRITY COMMISSION

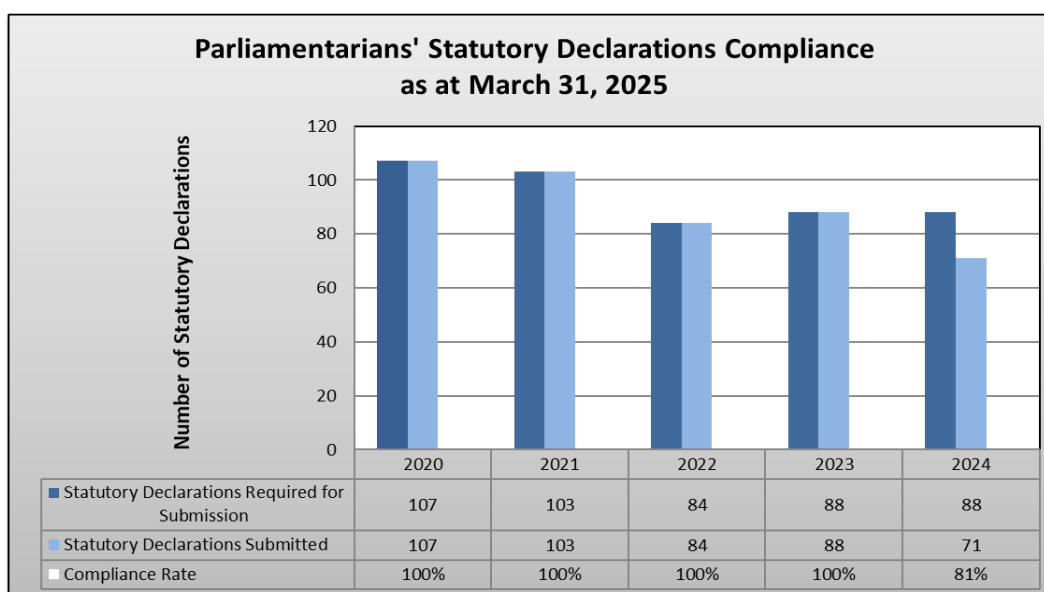
Parliamentarians

Seventy-one (71) Parliamentarians, who were required to file a Statutory Declaration, submitted their Statutory Declaration on or before the applicable deadline date, August 31, 2024, December 31, 2024, February 28, 2025 and March 31, 2025. Following the deadline date, seventeen (17) Parliamentarians submitted their Statutory Declarations. Therefore, as at the time of preparing this Report, all Parliamentarians filed their 2024 Statutory Declaration.

The table below details the 2024 submissions received from the respective groups:

Declarants	Declaration Date	Deadline for Submission	Number of Statutory Declarations Due for the year 2024	Statutory Declarations Submitted as at the Deadline Date	Late Submission	Outstanding Statutory Declarations
Former Member of the Senate	May 11, 2024	August 31, 2024	1	1	-	-
Former Member of Parliament	September 22, 2024	December 31, 2024	1	1	-	-
New Member of Parliament	September 30, 2024	December 31, 2024	1	1	-	-
New Members of Parliament	November 22, 2024	February 28, 2025	2	2	-	-
Members of Parliament	December 31, 2024	March 31, 2025	60	47	13	-
Members of the Senate	December 31, 2024	March 31, 2025	19	17	2	-
Former Members of Parliament	December 31, 2024	March 31, 2025	2	1	1	-
Former Members of the Senate	December 31, 2024	March 31, 2025	2	1	1	-
Total Statutory Declarations			88	71	17	0

The Graph below shows Parliamentarians' compliance for the years 2020, 2021, 2022, 2023 and 2024 as at March 31, 2025:



INTEGRITY COMMISSION

Public Officials

The Division received twenty-four thousand, five hundred (24,500) Statutory Declarations for varied declaration periods, during the period April 1, 2024 to March 31, 2025. The foregoing is one thousand, five hundred and thirty-five (1,535) more than the twenty-two thousand, nine hundred and sixty-five (22,965) Statutory Declarations received during the previous period.

The table below shows the number of Statutory Declarations received during April 1, 2024 to March 31, 2025:

Total Number of Statutory Declarations Received during the period April 1, 2024 to March 31, 2025

Statutory Declaration Period Ended	Number of Statutory Declarations Received as at March 31, 2024	Number of Statutory Declarations Received as at March 31, 2025	Number of Statutory Declarations Received during 2024/2025
December 31, 2003-2017	258,198	258,272	74
December 31, 2018	22,655	22,725	70
December 31, 2019	24,602	24,797	195
December 31, 2020	32,187	32,292	105
December 31, 2021	33,811	33,989	178
December 31 2022	36,388	36,710	322
December 31, 2023	15,848	21,631	5,783
December 31, 2024		17,773	17,773
Total Statutory Declarations received for the period 2024/2025			24,500

The continuous submission of outstanding Statutory Declarations can be attributed to the Commission's sustained stakeholder engagement initiatives, notifications sent to the Heads of Entities detailing compliance levels, issuing of Statutory and Discharge of Liability Notices, as well as the prosecution of non-compliant Declarants.

INTEGRITY COMMISSION

Overall Compliance Rates

The Division continues to experience steady growth with respect to prior years' compliance rates for the submission of Statutory Declarations. The table below summarizes the compliance rates for the declaration submission periods ended March 31, 2023, March 31, 2024 and March 31, 2025:

Statutory Declaration Period Ended	Number of Statutory Declarations Received as at March 31, 2023	Number of Statutory Declarations Received as at March 31, 2024	Number of Statutory Declarations Received as at March 31, 2025	Number of Statutory Declarations Expected	Compliance Rate as at March 31, 2023	Compliance Rate as at March 31, 2024	Compliance Rate as at March 31, 2025
December 31, 2018	22,378	22,655	22,725	35,000	64%	65%	65%
December 31, 2019	24,045	24,602	24,797	39,919	60%	62%	62%
December 31, 2020	31,631	32,187	32,292	40,449	78%	80%	80%
December 31, 2021	32,998	33,811	33,989	40,347	82%	84%	84%
December 31, 2022	31,535	36,388	36,710	44,348	71%	82%	83%
December 31, 2023	-	15,848	21,631	22,523		70%	96%
December 31, 2024	-	-	17,773	23,320			76%

Compliance rates were modest, with increases being reflected for the periods ended December 31, 2022 and December 31, 2023, the increases for all prior periods were too minimal to reflect any change in the rates. The number of Statutory Declarations received for the period ended December 31, 2024, as at the deadline date March 31, 2025, reflects a twelve percent (12%) increase when compared to the number of statutory declarations received in the prior year 2023. The compliance rate was recorded as seventy-six percent (76%) for Statutory Declarations required for submission as at December 31, 2024, the highest compliance rate recorded by the Commission at the close of a statutory deadline.

Additionally, the number of statutory declarations received during the financial year for the period ended December 31, 2023, increased by five thousand, seven hundred and eighty-three (5,783) bringing the compliance rate to ninety-six percent (96%). However, it should be noted that two thousand, four hundred and thirty-four (2,434) of the twenty-one thousand, six hundred and thirty-one (21,631) statutory declarations received to date for the period ended December 31, 2023, are from public officials not attached to any Declarants' List received from public bodies. Accordingly, an assessment will be done in the new financial year 2025/2026, to determine the eligibility of these public officials. Therefore, eighty-five percent (85%) of the public officials attached to a declarants' list have submitted their statutory declarations.

INTEGRITY COMMISSION

Compliance Rates for Senior and other Public Officials

The compliance rate for Public Officials in varied leadership categories is detailed in the table below:

Public Official Category	Estimated Number of Statutory Declarations required for the period ended December 31, 2024	Statutory Declarations Received as at March 31, 2025	Compliance Rate as at March 31, 2024	Compliance Rate as at March 31, 2025
Judiciary Officers	112	83	80%	74%
Councillors	296	220	74%	74%
Permanent Secretaries	17	15	94%	88%
Head of Entities	175	144	87%	82%
Other Public Officials	22,720	17,311	70%	76%

Notwithstanding the general increase in the compliance rate for the period ended December 31, 2024, marginal declines were observed for three (3) of the leadership categories. The Judiciary, Permanent Secretaries and Head of Entities categories all showed decline in the compliance rates when compared to that of the prior period at the close of the statutory deadline. However, a number of the public officials in the referenced categories submitted their statutory declarations after the deadline date, March 31, 2025.

The above table indicates that a majority of the leadership category has again demonstrated the commitment to comply with the requirement of the Integrity Commission Act, 2017, albeit late in some instances.

Data Entry Project

The Data Entry Project was implemented in 2020 to digitise Statutory Declaration information and provide support to the Electronic Declaration System (eDS). Given the delayed implementation of the eDS due to legislative challenges, the project continued through to 2024 as the Data Entry Team maintained support for registration of statutory declarations, entering of detailed information from statutory declarations, creation of Registry files and re-organisation of the Information and Complaints Registry.

The Ministry of Finance and the Public Service, given its policy position to reduce temporary positions across Ministries, Departments and Agencies, requested that steps be taken by the Integrity Commission to regularize the employment terms of the Data Entry Team. Subsequent to the presentation of the scope and functions of the Data Entry Team, the Ministry of Finance and the Public Service through its Strategic Human Resource Management Division, gave approval on February 25, 2025 for the addition of thirteen (13) new posts to the structure of Integrity Commission.

INTEGRITY COMMISSION

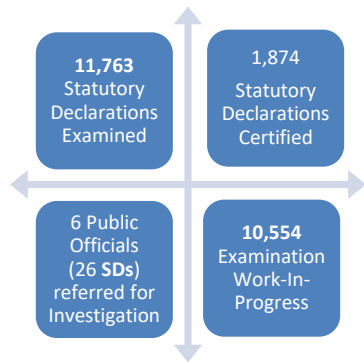
The Integrity Commission, in keeping with Section 35(2) of the Integrity Commission Act, 2017, now awaits approval from the Section 35 Committee.

The Integrity Commission, in keeping with Section 35(1) of the Integrity Commission Act, 2017, submitted the recommendation to the Section 35 Committee. However, the Chairman of the Section 35 Committee responded advising the Integrity Commission that they identified “... *a patent inconsistency between the definition of the “Committee” as set out in **section 2 of the Integrity Commission Act, 2017** (hereinafter referred to as ‘the Act’) and the actual composition of the body which currently purports to act in that capacity per **section 35(2)** of the Act.*”

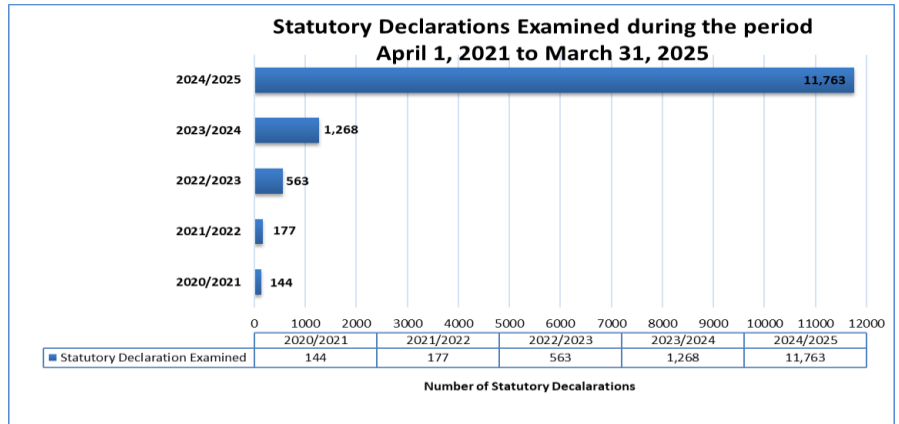
The Chairman of the Committee requested the Commission’s “... *continued patience as [they] seek to clarify the legislative inconsistency.*” The Chairman also stated that she will provide “...*a further response once the necessary guidance has been obtained as [they] endeavor to treat this matter with the urgency it deserves.*”

Statutory Declarations (SDs) - Examination

**Current Reporting Period
As at March 31st, 2025**



Examination of Statutory Declarations: 2020/2021 to 2024/2025



Examination and Certification of Statutory Declarations

During the reporting period, the Commission examined eleven thousand, seven hundred and sixty-three (11,763) Statutory Declarations, more than eight times that which was examined in the previous period. The Commission also certified one thousand, eight hundred and seventy-four (1,874) Statutory Declarations, eight hundred and eighty-six (886) more than that of the previous period.

The table below details the Declaration periods for which examinations and certifications were undertaken:

Statutory Declarations Examined and Certified during 2024/2025	Parliamentarians		Public Officials	
	Examined	Certified	Examined	Certified
2018	4	8	1,061	157
2019	9	13	1,554	248
2020	14	24	2,102	285
2021	18	26	2,295	324
2022	22	28	2,430	379
2023	76	32	2,169	346
2024	3	1	6	3
Total Statutory Declarations	146	132	11,617	1,742

The Information and Complaints Division was tasked by the Integrity Commission Parliamentary Oversight Committee to develop strategies to reduce the severe backlog of statutory declarations to be examined. In response to the request, the Division reviewed and re-organized its processes. The new process focuses on determining completeness, including third-party checks, to conclude the Examination of a Statutory Declaration. Public Officials are then requested to submit any outstanding supporting documents, answer questions, and amend their Statutory Declaration form. Thereafter, a determination is then made as to whether the Statutory Declaration is to be certified or referred to the Commission for further and necessary action.

INTEGRITY COMMISSION

To support the new process, staffing reassignments were undertaken and the scope of work of the Data Entry Team was changed. The functions of the Data Entry Team now include:

1. Preliminary review of the Statutory Declarations;
2. Identifying areas for correction and/or supporting documents which are outstanding;
3. Drafting the initial Enquiry and Examination Process (EEP) request; and
4. In collaboration with the Declaration Verification Officers, scheduling and managing appointments with Public Officials.

Notwithstanding the foregoing re-organisation, selected staff members continued to support the operationalization of the Risk Based Framework for the Examination of Statutory Declarations.

Matrix of Statutory Declarations' Examination and Outcomes

The table below provide details of the Matrix of Statutory Declarations' Examination and Outcomes during the period April 1, 2018 to March 31, 2025:

Category	Number of Statutory Declarations Received	Number of Statutory Declarations Examined	Number of Statutory Declarations Certified	Number of Public Officials referred for Prosecution for Failure to provide Information	Number of Public Officials Referred for Investigation for potential Illicit Enrichment and/or False Information	Examination Work-In-Progress
Members of Parliament	476	398	268	10	13	60
Members of the Senate	156	122	87	3	1	34
Councillors	1,426	359	64	5	7	274
Permanent Secretaries	133	34	20	1	1	6
Heads of Entities	1,117	238	75	1	7	147
Other Public Officials	186,103	12,936	3,140	5	36	10,033
	189,411	14,087	3,654	25	65³ (319 SDs)	10,554

³ Some Public Officials were referred for breaches of the Integrity Commission Act, which included multiple Statutory Declarations, a total of three hundred and nineteen (319) Statutory Declarations since 2018.

INTEGRITY COMMISSION

Matrix of Referral Outcomes

The table below provide details of the Matrix of Referral Outcomes during the period April 1, 2018 to March 31, 2025:

Category	Failure to Provide Information		Potential Illicit Enrichment and/or False Information		
	Number of Closures	Number of Prosecutions	Number Closures after Investigation/ Preliminary Enquiry	Number of Rulings to Charge/ Prosecution	Number of Rulings NOT to Charge
Members of Parliament	9	1	6	1	1
Members of the Senate	2	1	-	-	-
Councillors	4	-	1	2	-
Permanent Secretaries	2	-	1	-	-
Heads of Entities	-	-	4	1	-
Other Public Officials	4	-	6	1	
	21⁴	2	18	5	1

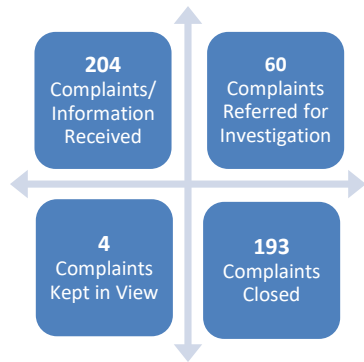
The Division continued the initiative to examine the Statutory Declarations submitted by all sitting Parliamentarians (Members of Parliament and the Senate) for the declaration periods ended December 31, 2018 through to December 31, 2023.

The Division is pleased to report that as at March 31st, 2025, it has completed the Examination of all sitting Parliamentarians' Statutory Declarations for the period 2018 – 2023, save for the Parliamentarians' Statutory Declarations that were referred for Investigation.

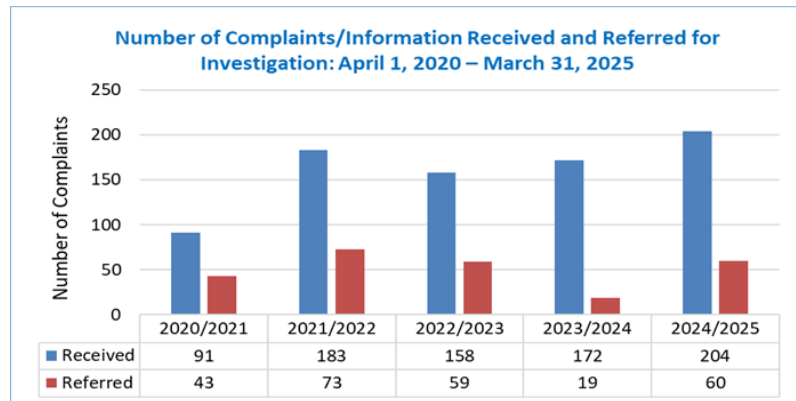
⁴ This total includes three (3) Discharge of Liability matters that were settled in full (payment of fine and provision of information), Two (2) provided the information prior to a ruling, two (2) provided information after a ruling but prior to service of the Discharge of Liability Notice and fourteen (14) were denied and closed.

Complaints Management

Current Reporting Period As at March 31st, 2025



Five Year Comparison



For the period under review, two hundred and four (204) complaints and information were received or identified for assessment by the Division. These came through various media such as: the Integrity Commission's web portal, Information Gathering Framework, by letters, via telephone calls, emails and walk-ins.

The complaints and information received, assessed and referred by the Division during April 1, 2024 to March 31, 2025, are detailed in the table below:

Description of Information	Complaints/ Information Received	Number of Referral	Number of Closure	Number of Matters in Keep-In-View Status	Number of Matters in Work- In-Progress Status
Complaints	187	55	168	2	44
Director's Discretion	17	5	25	2	11
Total	204	60	193	4	55

The average time taken to process a complaint is dependent on the information presented to the Integrity Commission. Information received is sometimes vague and necessitates further verification to validate its authenticity, in order to determine the required steps and actions necessary to resolve such matters.

On average, the process of receiving, logging, acknowledging, assessing, reviewing and referring a complaint can take approximately five (5) to twenty (20) business days. However, in some instances, the Division exceeded the established timeline due to the complexity of certain complaints and the level of research required to complete the assessment.

INTEGRITY COMMISSION

Types of Complaints Received by the Integrity Commission

Types of Complaint	Number Received
Conflict of Interest	16
Contract Procurement Breach	13
Corruption/Fraud	31
Irregularity/Impropriety	72
License/Permit	8
Other	115

Referrals

Following the assessment of complaints and information received, and upon the approval by the Director of Information and Complaints, matters are referred to the Director of Investigation for action pursuant to Section 38(1)(d) of the Integrity Commission Act, 2017.

For the period under review, sixty (60) matters were referred to the Director of Investigation, one hundred and ninety-three (193) matters were closed⁵ and four (4) matters are being kept-in-view.

⁵ These matters include those not in the Integrity Commission's jurisdiction, instances where there is insufficient information, and the assessment concluded that such allegation was inaccurate.

Protected Disclosures

	Number of Public Bodies that submitted Protected Disclosures Procedural Guidelines	Number of Protected Disclosures Received by Public Sector Entities	Number of Protected Disclosures Received by the Integrity Commission
2021/2022	16 (9%)	1	4
2022/2023	149 (81%)	6	7
2023/2024	169 (94%)	11	20
2024/2025	175 (98%)	8	13

The Information and Complaints Division continued to focus on the operationalisation of the Protected Disclosures Act, 2011. The Protected Disclosures Work Programme was approved by the Information and Complaints Committee in 2021 and implementation continued during the period April 1, 2024 to March 31, 2025.

The Work Programme includes; the establishment and staffing of a Protected Disclosure Section, Internal Capacity Building and finalisation of the Protected Disclosure Process, Engagement with Prescribed Persons, Publication of the Protected Disclosures Procedural Guidelines Gazette, Requisition of Public Bodies to submit draft Protected Disclosures Procedural Guidelines, Development of a Technology Platform, Capacity Building for Designated Officers, Public Education Campaign, and Monitoring and Reporting.

The Integrity Commission as Designated Authority and other Public Bodies have received an aggregate of seventy (70) Protected Disclosures over the period 2021/2022 to 2024/2025. This provides a sufficient basis to conclude that Employees are willing to utilize the established mechanisms to make disclosures.

Below please find details of the activities as at March 31, 2025:

1. Subsequent to the Ministry of Finance and the Public Service approval of the reclassification and retitling of positions within the established Complaints and Protected Disclosures Unit in November 2023, the Unit currently has its full staff complement of the eight (8) employees as approved on the Organizational Structure.

INTEGRITY COMMISSION

2. One hundred and ninety-seven (197) Public Bodies were requisitioned to prepare their Protected Disclosures Procedural Guidelines (PDPG) in accordance with the Act. Of the 197 Public Bodies, only one hundred and seventy-eight (178) are required to submit a PDPG. As at March 31, 2025, a total of one hundred and seventy-five (175) Public Bodies submitted their draft PDPGs. The Integrity Commission has approved the PDPGs for one hundred and sixty-two (162) Public Bodies. Notwithstanding several written requests and follow-up calls, the three remaining Public Bodies have still not yet submitted a first draft of their PDPG.
3. The Integrity Commission continues in its efforts to develop the Complaints and Protected Disclosures Management System (CPDMS), making it fit for purpose to effectively manage the Complaints and Protected Disclosures processes. The public will be sensitized on the utilization of the CPDMS through the Complaints and Protected Disclosures Public Relations Campaign, during the financial year 2025/2026.
4. The Management Institute for National Development (MIND) facilitated the training of two (2) cohorts of fifty (50) Designated Officers during the year 2024/2025. To date, a total of one hundred and sixty-three (163) Designated Officers have successfully completed the training and were eligible for certification. The next Protected Disclosures Act – Designated Officer Training will be scheduled in the Financial Year 2025/2026, as MIND continues this initiative and includes the course in its Programmes' List. There are approximately two hundred and nineteen (219) Designated Officers to be trained.
5. The Division facilitated one hundred and four (104) Protected Disclosures Sensitisation sessions during the reporting period. As at March 31, 2025, forty-five (45) Public Bodies have not yet been sensitised with respect to the Protected Disclosures Act, 2011.
6. The Public Relations Campaign continued throughout the period and the Commission currently has six (6) Billboards strategically placed in Savanna-La-Mar, St. Ann, St. Catherine, Trafalgar Road - New Kingston, and Cross Roads. Under this Initiative, other public education programmes were launched through the Jamaica Information Service (JIS) to raise awareness of the Protected Disclosures Act, 2011.
7. As at March 31, 2025, one hundred and sixty-one (161) Public Bodies have commenced the operationalisation of their Protected Disclosures Procedural Guidelines, pursuant to the Protected Disclosures Act. These Public Bodies have submitted their Monthly Reports in keeping with the requirement of the Protected Disclosures Act, 2011.

INTEGRITY COMMISSION

Protected Disclosures Annual Report for the period January 1, 2022 to December 31, 2022 and January 1, 2023 to December 31, 2023

As at June 30, 2024, the Integrity Commission has submitted two (2) Protected Disclosures Annual Report to the Minister of Justice, for the period January 1, 2022 to December 31, 2022 and January 1, 2023 to December 31, 2023. As at the date of preparing this Report, neither have been tabled in the Parliament. The Reports provide further details, *inter alia*, on the handling of Disclosures received.

Protected Disclosures Received by the Designated Authority

For the period under review, thirteen (13) Disclosures were received by the Division, and fifteen (15) Protected Disclosures matters were carried forward from the previous period. Eleven (11) of these Disclosures were reviewed and assessed; ten (10) matters were closed, one (1) was referred to the Director of Investigation, and seventeen (17) matters are work-in-progress.

Information and Complaints Division Major Initiatives

Electronic Declaration System (eDS)

The Commission continues in its effort to implement the Electronic Declaration System (eDS). However, it was determined that the Integrity Commission Act require amendments to facilitate electronic submission of Statutory Declarations. Therefore, the launch had to be postponed.

By way of letter to the Chairman of the Joint Select Committee reviewing the Integrity Commission Act, the Commission recommended that the Committee considers the proposal to make the necessary amendments to the Integrity Commission Act, to include the requirement for electronic submission.

Complaints and Protected Disclosures Management System (CPDMS)

The Division continued its engagement with the developers of the CPDMS, along with key stakeholders across the Commission. The System will be launched in the second quarter 2025/2026 Financial Year.

Regulations – Amendment to the Third Schedule of the Integrity Commission Act, 2017

Section 64 of the Integrity Commission Act, 2017, states, *inter alia*, that the Commission may make regulations to amend the Third Schedule, for which “...*Regulations made... shall be subject to affirmative resolution*”

The primary objective of preparing the draft regulations for the Third Schedule is to strengthen the Commission's analysis process, clarify certain ambiguous sections and to incorporate feedback received from Declarants over the years.

The Third Schedule was amended in 2020 to provide for the electronic submission of statutory declarations by Public Officials (Declarants).

The Third Schedule is the Commission's primary data collection tool which aids with the determination of a Declarant's Net Worth; to ensure that any growth in assets and/or reduction in liabilities are sufficiently supported by legitimate income.

The legitimacy of the assets, liabilities and income declared by Declarants must be validated by the Commission's research and Third-Party verification processes, in the first instance, to ensure that there is no concealment.

In effect, the true and complete disclosures made by Declarants coupled with the Commission's research and Third-Party verifications will inform its analysis and consequent findings.

Succinctly put, the Commission must ensure that there is no Illicit Enrichment, prior to certifying a Statutory Declaration.

Some of the recommended inclusions are: disclosure of other financial assets such as cryptocurrency and other digital currencies, financial statements for any company which the declarant is a beneficial owner, cost of property improvements, trust property and blind trust, Government contracts or subcontracts, Board memberships and whether the declarant is a politically exposed person.

By way of letter dated August 25, 2021, the Office of the Prime Minister wrote to the Integrity Commission advising that the Regulations regarding the Third Schedule of the Integrity Commission Act have been reviewed by the Integrity Commission Parliamentary Oversight Committee. The Commission was invited to a Parliamentary Oversight Committee Meeting on October 14, 2021, to provide clarification on the proposed changes to be made to the Third Schedule.

The Chair of the Integrity Commission Parliamentary Oversight Committee advised that a meeting would be convened in early 2022. However, as at the date of this Report, no communication has been received regarding the date of a meeting.

2024 Gazette - Positions and functions required to file a Statutory Declaration

The Division developed a formula-based document and sought the assistance of Heads of Entities to complete same. The document was developed to assist the Division to identify High-Risk positions across the Ministries, Departments and Agencies (MDAs). Given the low uptake, the Division retained the positions that were detailed in the 2023 Gazette along with other recommended amendments, to prepare the 2024 Gazette.

During the second quarter of the new Financial Year 2025/2026, the Division will commence a revised consultative process with MDAs and other key stakeholders, to inform the amendments to the 2025 Gazette.

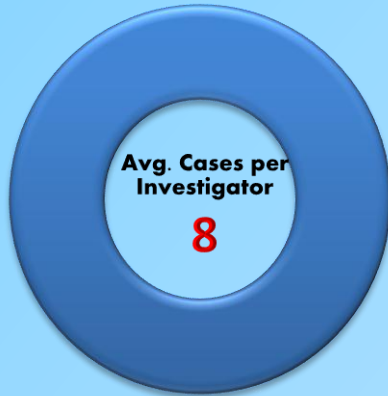
Chapter 6 - Investigation Division

INVESTIGATION DIVISION DASHBOARD⁶

Investigation Arm - Units: CPCI/ DFI/ FAAU

Current Reporting Period 2024/2025

Current Reporting Period



71 Complaints/Referrals Received

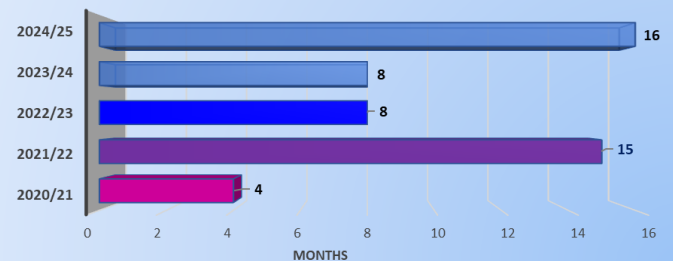
9 Investigations Closed, Reports Tabled

32 Cases Closed on Preliminary Enquiries

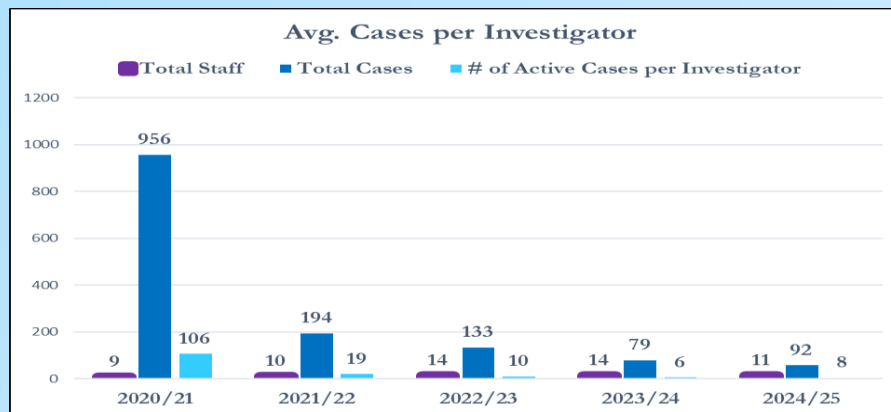
Investigation Arm – Five Year Comparison



Turnaround time for Cases commencing May 2020 and Beyond (in Months)



Investigation Arm – Five Year Comparison



⁶ Investigation Arm – CPCI- Contract, Procurement and Corruption Investigations; FAAU - Forensic Audit &Accounting Unit; DFI-Declarations and Financial Investigations, IWM- Intelligence & Witness Management

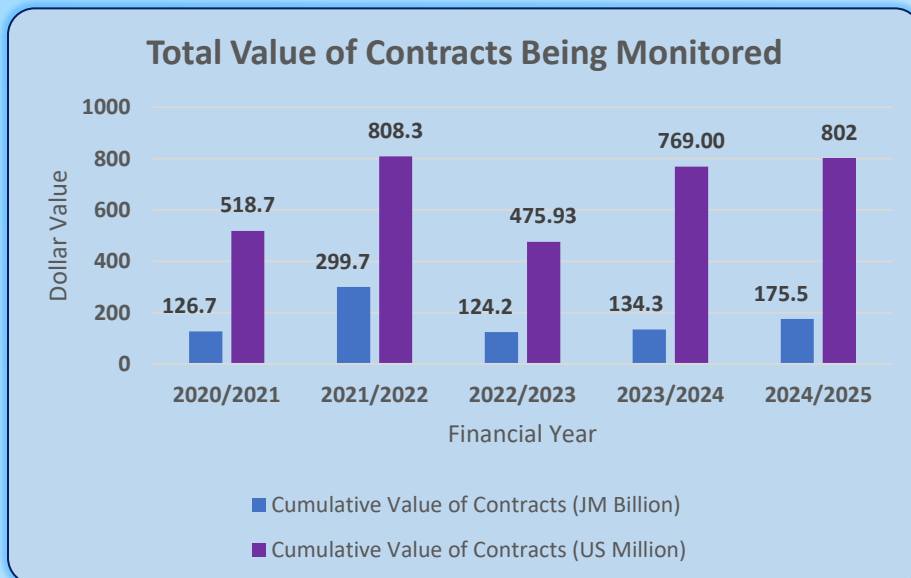
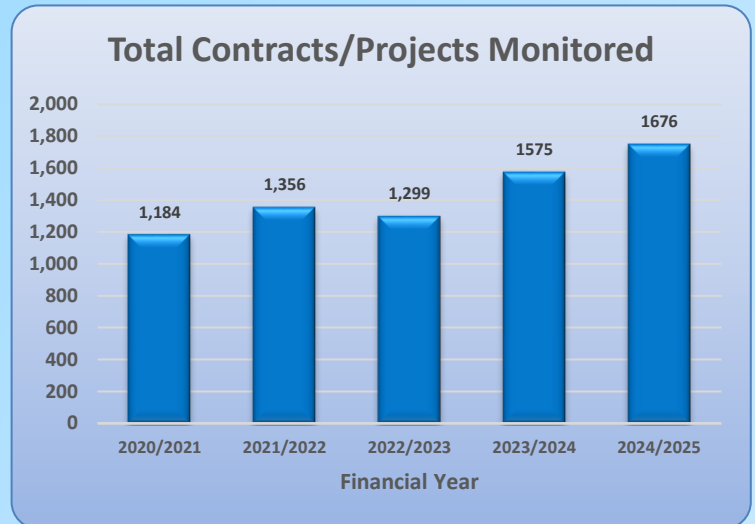
INVESTIGATION DIVISION DASHBOARD

Monitoring Arm - Units: CMU/ LADA

Contracts/Projects Monitored

Reporting Period – 2024/2025

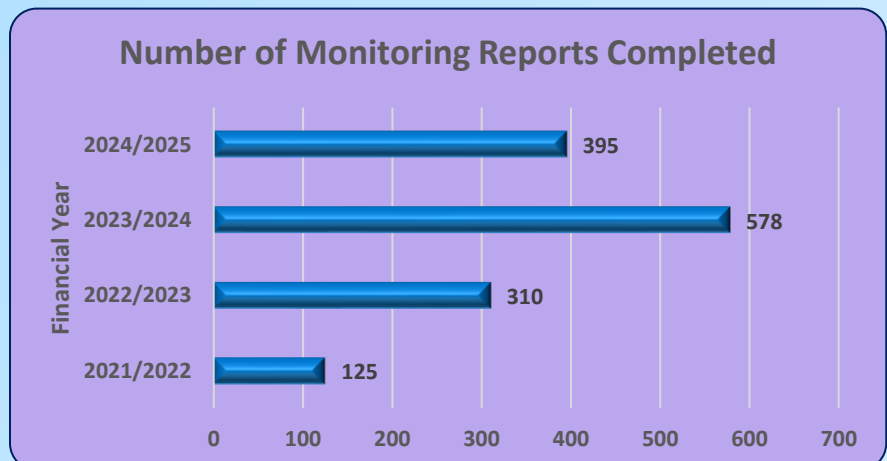
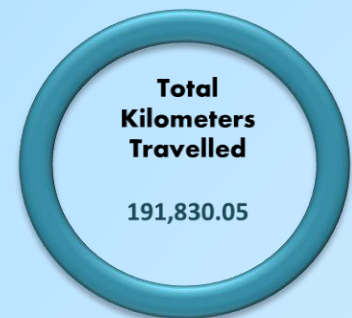
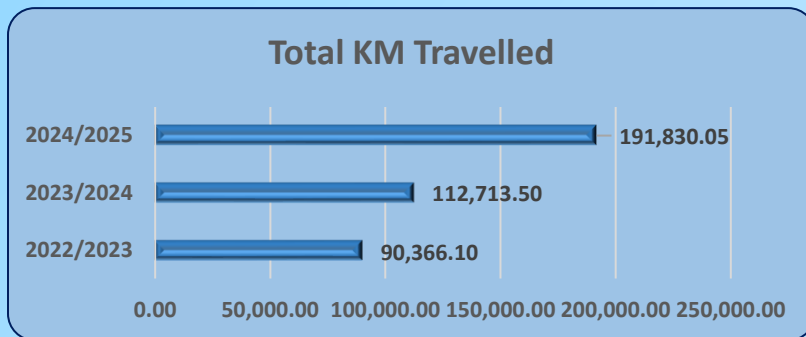
Five Year Comparative Chart



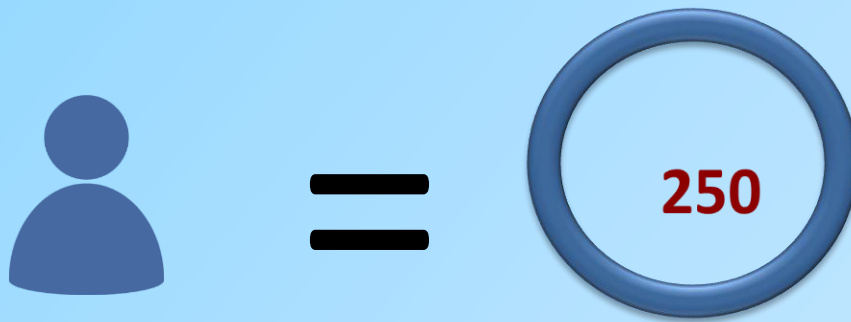
Monitoring Arm- Contract Monitoring Unit (CMU) and Licencing, Asset Divestment/Acquisition (LADA).



Three Year Comparative Chart



Ratio of Cases to Inspector

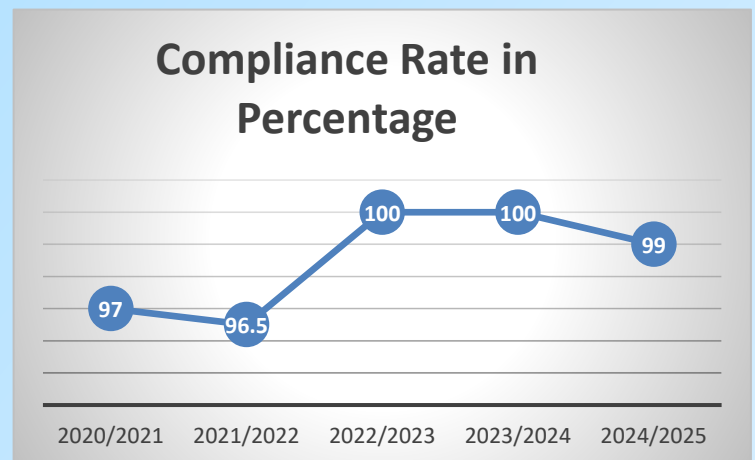


Quarterly Contracts Award Report - Compliance

Reporting Period 2024/2025



Five Year Comparative Chart

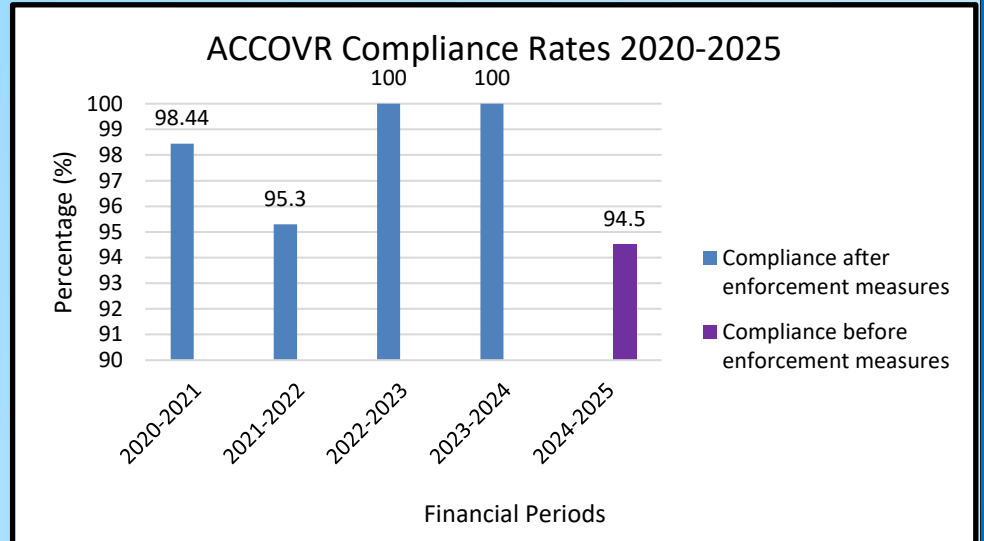


Annual Contract Cost Overrun and Variation Report- Compliance

Reporting Period 2024/2025



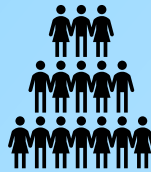
Five Year Comparative Chart



Human Resource Capacity

8

Overall Human Resource



77%

(44/57 Staff Members)

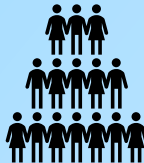
Office of the Director of Investigation



100%

(4 Staff Members)

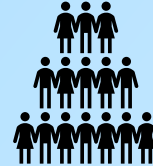
Investigation Arm Human Resource



68%

(15 Staff Members)

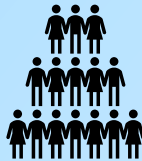
Monitoring Arm Human Resource



100%

(20 Staff Members)

Supporting Units Human Resource



45%

(5 Staff Members)

Declaration & Financial Investigation	Contract, Procurement & Corruption Investigation	Forensic Accounting & Audit	Intelligence & Witness Management	Licensing & Asset Divestment/ Acquisition
Manager, Declaration & Financial Investigation (1 vacant)	Manager, Contract, Procurement & Corruption Investigation (1 vacant)	Forensic Accountant (1 vacant)	Witness & Court Liaison Officer (1 vacant)	Inspector (1 vacant)
Financial Investigator (2 vacant)	Investigator (1 vacant)	Senior Contract Auditor (1 vacant)		
		Contract Auditor (2)		

⁸ Overall Human Resource - Percentage of the Division's establishment

Statistical Performance – Matters Investigated

Contract, Procurement & Corruption Investigation (CPCI) Unit

During the 2024/2025 financial year, a total of forty-seven (47) complaints were referred for investigation. The matters related to, *inter alia*, (a) allegations of impropriety and irregularity in the award of Government of Jamaica (GOJ) contracts, (b) allegations of conflict of interest and nepotism in the award and implementation of GOJ contracts, (c) allegations of corruption and breaches of the Corruption Prevention Act, (d) allegations of abuse and misuse of public funds, (e) breaches in the approval process in relation to Building Permits by Municipal Corporations, (f) breaches of the GOJ procurement procedures, the Public Bodies Management and Accountability Act and the Financial Administration and Audit Act, and other Financial Irregularities in the implementation and administration of GOJ contracts by Public Bodies; (f) allegations of conflicts of interest, and corruption involving Directors of Public Boards; and (g) allegations of corruption in the award of GOJ contracts and grant of prescribed licences, and impropriety in the management and governance of Public Bodies.

Of the forty-seven (47) complaints received for investigation by the unit, thirty-six (36) matters were pursued. A number of the matters pursued were resolved and the remainder are at varying stages of the investigation process, pursuant to Section 33 of the Integrity Commission Act.

Inclusive of the aforementioned cases referred for the period under review, twenty-three (23) cases were closed in accordance with Section 47, of the Integrity Commission Act, one (1) of which was referred externally and two (2) internally. Four (4) cases were tabled in the Houses of Parliament (refer to 'Table 1 – Particulars of Reports Tabled over the Reporting Period').

Overall, at the end of the 2024/2025 financial year, a total of twenty-seven (27) matters were closed. A breakdown of the closed matters is provided below:

Completed/Closed Matters Over the Period 2023/2024	
Matters Tabled in Parliament	4
Matters Closed on Preliminary Enquiries*	23
Matters Referred to Competent Agencies (closed)	1
Investigation Terminated	0
Total Completed Matters Over the Period	27

*Include matters that were closed after preliminary enquiries, referred to Competent Agencies, and referred internally

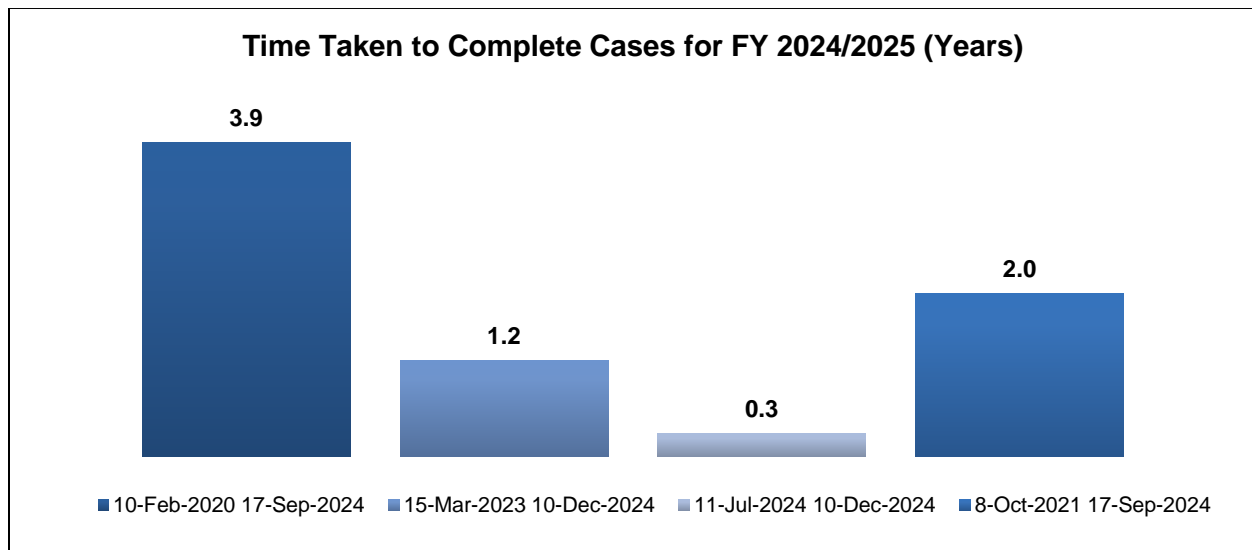
INTEGRITY COMMISSION

Particulars of Reports Tabled over the Reporting Period

No.	Investigation	Commencement Date	Date Investigation was Completed	Date of Tabling in House of House of Representatives ⁹
1.	Concerning Allegations of 'an Act(s) of Corruption' in respect of the Recovery of Outstanding National Insurance Scheme (NIS) Contributions at the Westmoreland Parish Office of the Ministry of Labour and Social Security (MLSS) for the Period 2022 – 2023, Contrary to the Corruption Prevention Act.	March 15, 2023	July 9, 2024	December 10, 2024
2.	Concerning Allegations of Irregularities and Conflict of Interest in Relation to the Operations of the Carl Rattray Staff College, Department of Correctional Services (DCS)	October 8, 2021	July 19, 2024	September 17, 2024
3.	Concerning Allegations of Impropropriety and Irregularity in the Utilization of the Limited Tender and Direct Contracting Procurement Methodologies in the Award of Contracts to Nubian 1 Construction Limited for the period January 2016 to August 2019	February 10, 2020	July 19, 2024	September 17, 2024
4.	Concerning Irregularities in Respect of the Construction of a Residential Development, located at 2 Weycliffe Close, Beverly Hills, Kingston 6, Contrary to the Terms of the Building Permit Issued to Estatebridge Holdings Limited by the KSAMC.	July 11, 2024	December 3, 2024	December 10, 2024

The figure below shows the time taken to complete cases which were tabled in the Houses of Parliament for the current financial year (2024/2025).

Time Taken to Complete Cases



⁹ Reflects the date on which the report was tabled in the House of Representative.

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Historical Comparison of Cases Investigated for the Period April 2018 – March 2025

Since the inception of the Integrity Commission, the Contract, Procurement & Corruption Investigation Unit received two hundred and ninety-three (293) complaints. Of this number, one hundred and ninety-one (191) cases were pursued. Of the cases pursued, one hundred and seventy-six (176) or 92% were completed. The table below provides a breakdown of the cases over the period April 2018 – March 2025.

Table Showing CPCI Case Status Over a Certain Period

Cases	Legacy Cases	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/25	Total
Complaints Received	20	8	23	43	73	59	20	47	293
Complaints Pursued	20	7	3	24	41	46	14	36	191
Closed after Investigation- Report Tabled	0	5	3	5	14	12	6	4	49
Referred Internally	0	0	0	0	3	5	5	2	15
Referred Externally	0	0	0	0	1	6	0	1	8
Closed on Preliminary Enquiries (not pursued)	0	0	0	0	1	52	29	22	104

Declarations and Financial Investigations Unit

The Declarations and Financial Investigations Unit, *inter alia*, conducts investigations pursuant to Section 43 of the Integrity Commission Act and Section 14 of the Corruption Prevention Act, into the Statutory Declarations filed by public officials. These investigations include matters of non-compliance such as Failure to File Statutory Declarations, or Failure to Comply with a Request for Information, Making a False Statement in a Statutory Declaration and Illicit Enrichment allegations.

At the end of FY 2023/24, the Unit had a total of fifty-five (55) open investigations. In FY 2024/25, the number of open investigations stood at fifty-two (52). Over the last five years from FY 2020/21 to 2024/25, a total of one hundred and forty-eight (148) cases have been referred to the Director of Corruption Prosecution (DCP) by the Unit. In FY 2024/25, three (3) matters were referred to the DCP after investigation.

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The tables and figures below portray the particulars of the Declarations and Financial Investigations Unit portfolio over the period 2020 - 2025:

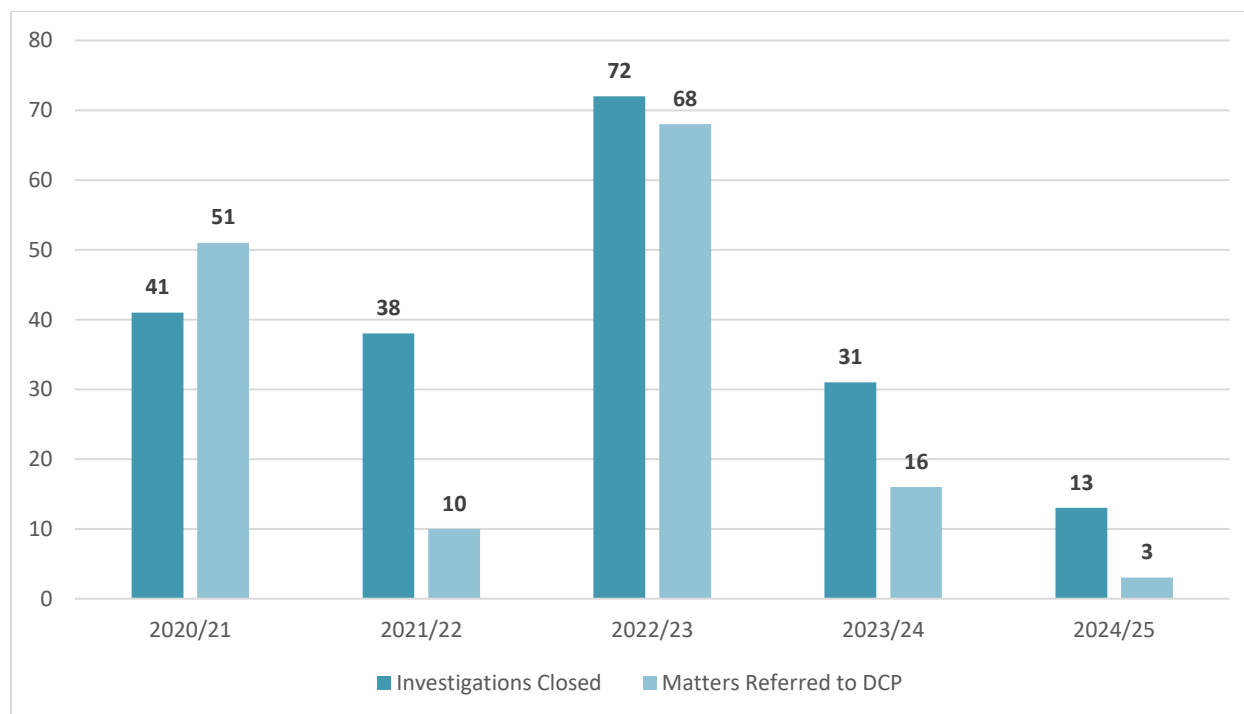
Declarations and Financial Investigations 2020 - 2025						
	2020/21	2021/22	2022/23	2023/24	2024/25	Totals
Total Investigations/ Referrals received	913	121	74	55	24	1187
Investigations Closed	41	38	72	31	13	195
Matters Closed on Preliminary Enquiry		847	2	9	82*	868
Matters Referred to DCP	51	10	68	16	3	148
Average Days to Complete Investigations	756	2404	329	391	228	822

*Include matters closed from previous years but were unaccounted for during the appropriate financial period.

In FY 2024/25, the Unit closed thirteen (13) investigations, with eight (8) cases being completed within six months. Additionally, the average time taken for cases referred to the DCP during the FY 2024/25 was 228 days.

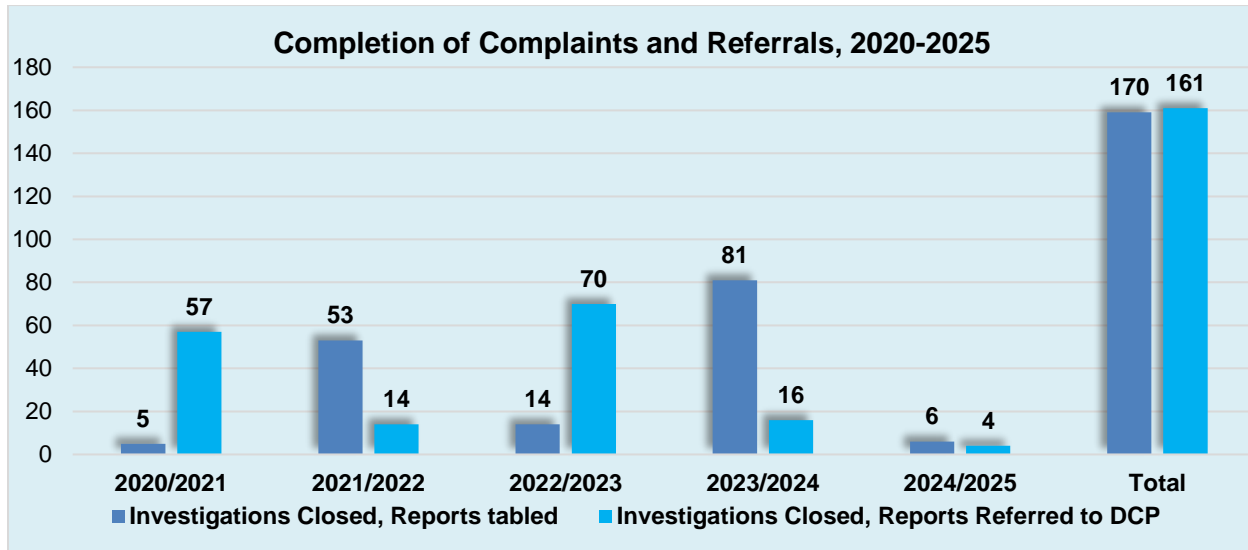
The Unit has tabled a total of five (5) investigation reports in the Houses of Parliament, in FY 2024/25.

Chart Showing DFI Unit Investigations Conducted and the Cases referred to the DCP



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Completion of Complaints and Referrals Pursued



Historical Comparison of Cases Investigated for the Period April 2018 – March 2025

Since the establishment of the Integrity Commission, the Investigation Division has completed and tabled over one hundred and seventy (170) reports. Additionally, more than one hundred and sixty (160) cases have been referred to the Director of Corruption Prosecution. A breakdown is provided in the table and graph below:

Status/Disposal of Complaints and Referrals

Cases	Legacy Cases	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	Total
Investigation Closed, Reports Tabled	0	5	3	5	53	14	81	9	170
Investigation Closed, Reports Referred to DCP	0	0	0	57	14	70	16	4	161

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Historical Comparison of Cases Investigated for the Period April 2018 – March 2025

Since the establishment of the Integrity Commission, the Investigation Division completed approximately 90% of investigations pursued, subsequent to the receipt of one thousand five hundred and one (1501) referrals/complaints.

A breakdown is provided in the table and graph below:

Status/Disposal of Complaints and Referrals

Cases	Legacy Cases	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	Total
Complaints/Referrals Received	478	556	27	82	148	112	27	71	1501
Investigation Closed, Reports Tabled	0	5	3	5	53	14	81	9	170
Referred Internally/Externally	0	0	0	0	4	11	3	4	22
Investigation Closed, Reports Referred to DCP	0	0	0	57	14	70	16	4	161
Investigation Closed on Preliminary Enquiries	0	1	2	41	848	126	40	104	1162

Contract Monitoring Unit

The Contract Monitoring Unit (CMU) is one of the key components of the Investigation Division and is responsible for the monitoring of the award, implementation and termination of Government Contracts. The Unit is comprised of two (2) sub-units, namely, (i) the Construction Contracts Inspectorate (CCI) sub-unit and (ii) the Non-Construction Contracts Inspectorate (NCCI) sub-unit. The Unit currently has its full complement of one (1) Manager, four (4) Senior Inspectors and eight (8) Inspectors. This was achieved when, on June 3, 2024, two persons joined the team as Non-Construction Inspectors and shortly thereafter, on July 1, the final person came on-board as a Construction Inspector to complete our team at the CMU.

On the whole, government contracts are awarded on merit and are completed within time and budget. Value for money is also more often than not, achieved. Notwithstanding, there are instances where, *inter alia*, poor procurement planning, faulty preparation of bidding documents, poor contractor performance and a lack of vigilance on the part of procuring entities in the post contract phase, result in cost overruns, delays and value for money not being achieved. In these instances, the Director of Investigation (DI) brings this to the attention of the concerned procuring entities, encouraging them to implement remedial steps, which is usually done by way of advice, caution and/or warning.

As it relates to contractor performance, the DI notes a general reluctance on the part of public bodies to engage the raft of remedies available to them for breach of contract, particularly liquidated damages. This reluctance may have contributed significantly to the delayed completion of projects, thereby placing undue stress on the timely delivery of educational and health intuitions, offices and infrastructure which in turn would have deprived the general public of the benefits of these facilities for a period of time. The existence of this state of affairs makes it all the more important for a national strategy to be implemented to ensure that only contractors who perform well benefit from government contracts. Such a strategy however, requires a joined-up approach, involving all stakeholders and the tearing down of information silos and other barriers.

The issue of conflict of interest continues to bedevil public procurement in Jamaica. Ways must be found to standardise the approach to appropriately treat with this malady. The mishandling of conflicts of interest often corrupts what would otherwise be a legitimate process/undertaking.

The activities of the respective sub-units over the reporting period are detailed below.

Monitoring of Construction Contracts

The categories of projects that are monitored include Public Infrastructure, Housing, Mechanical and Electrical contracts/projects being implemented by various Ministries, Departments and Agencies of the Government of

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Jamaica (GOJ), or any authorized personnel acting on behalf of the GOJ. Additionally, the unit provides advice on procurement matters to these entities.

Monitoring of a project may commence at the pre or post contract phase. Generally, it commences when GOJ entities place advertisements in the various news media, after which an Inspector is assigned to monitor the project until final completion. On average, each Inspector monitors just over one hundred and forty (140) projects.

The monitoring process includes the attendance of CCI representatives at tender openings, site meetings/visits and the compiling of monitoring reports. In circumstances where an issue is identified during the pre or post contract phase of a project, the procuring entity is engaged on the matter either verbally or by way of a formal letter in order for a resolution to be found at the earliest stage of the process, consistent with the applicable procurement and contract guidelines, policies and legislation.

During the period April 1, 2023 to March 31, 2024, the Construction Contracts Inspectorate monitored the pre and/or post contract phases for six hundred and fifty-five (655) contracts. The cumulative value of the construction contracts that were monitored was J\$142,874,121,076.21 and US\$719,694,649.26.

During the same period, the Construction Inspectors made a total of two hundred and two (202) site visits.

The Construction Contracts Inspectors attended one hundred and thirty-four (134) site meetings and were involved in the monitoring of five (5) Practical Completion Inspections. At the end of the reporting period, the Inspectors travelled a total of 69,535.4 kilometres for the purpose of discharging their monitoring duties island-wide.

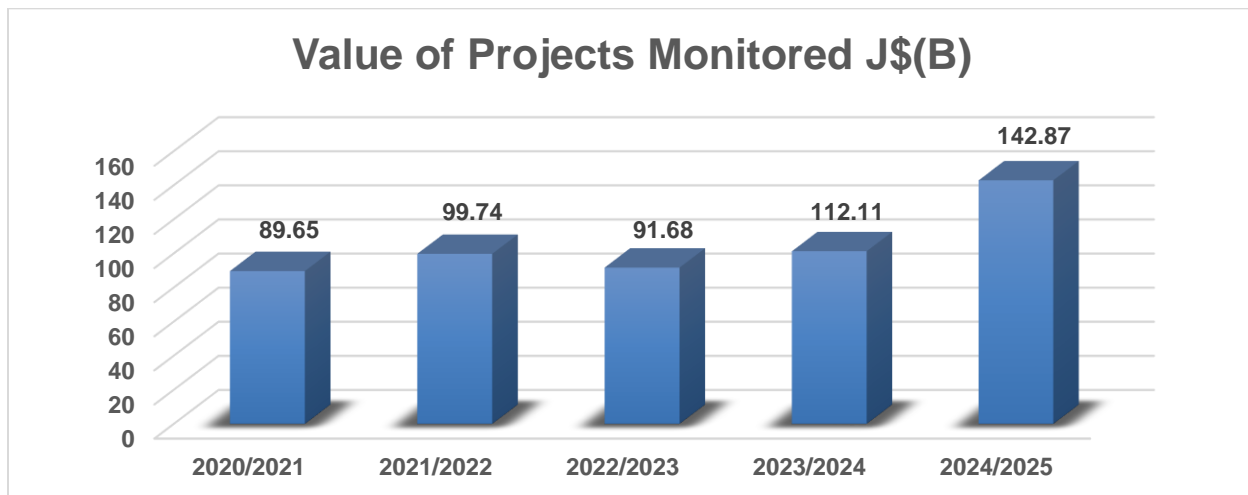
The table below details the statistics relating to the performance and activities of the CCI for the reporting period juxtaposed with data from previous years.

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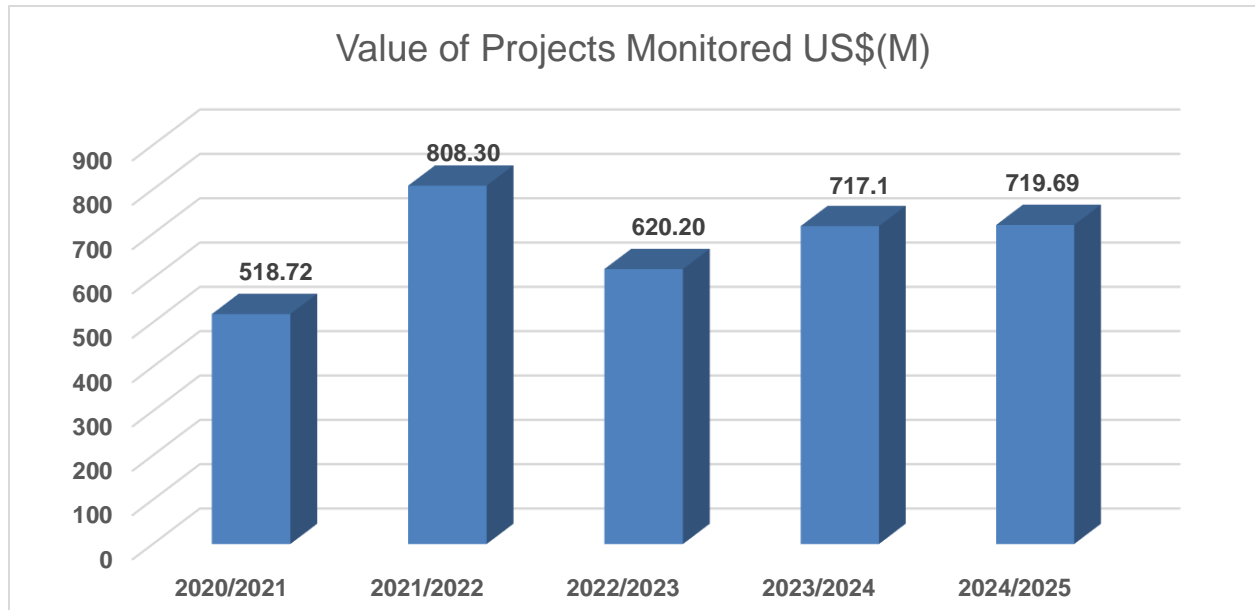
Construction Contracts Unit Key Statistics

Data April 1, 2021 – March 31, 2025					
Activity/Item	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025
Number of Man hours of contact with and presentation to Public Bodies	152	76	264	407	156.5
Number of monthly Unit meetings held (Includes both sub units)	12	7	9	11	8
Number of training programmes attended by the Unit (Includes both sub units)	4	7	9	16	17
Number of Construction Projects monitored	536	601	662	686	655
Number of Site meetings attended	57	99	113	79	134
Number of site visits attended	216	311	272	228	202
Number of Final Completion Reports	0	0	113	30	12
Number of Practical Completion inspections attended	3	19	9	8	5
Cumulative Value of Construction Contracts monitored, awarded in Jamaican Dollar (J\$)	J\$89.65 B	J\$99.74 B	J\$91.68 B	J\$112.11 B	J\$142.87 B
Cumulative Value of Construction Contracts monitored, awarded in United States Dollar (US\$)	US\$518.72 M	US\$808.30 M	US\$620.20 M	US\$717.10 M	US\$719.69 M
Total distance travelled by Inspectors (includes both sub units)	58,194 Km	67,537 Km	90, 689 Km	69,535.4 Km	182,862 Km

Value of Projects Monitored



Value of Projects Monitored



Annual Contracts Cost Overruns and Variations Report (ACCOVR)

The GOJ Handbook of Public Procurement Procedures defines a Cost Overrun as “...an increase in the contract sum resulting from escalation in the price of labour and/or material.”, while a Variation is defined as “...a change to the deliverable(s) under a contract caused by an increase or decrease in the scope of work to be performed, amount/type of goods to be supplied or services to be provided, and must be directly related to the specific contract.”

For example, pre-contract activities, if not executed efficiently by the MDAs, may lead to contract variations in the following circumstances, amongst others:

1. Late commencement of procurement process;
2. Use of incorrect procurement process/documents;
3. Selection of unsuitable bidder; and
4. Utilization of incorrect tender methodology.

ACCOVR Data

*** Please note that the following figures represent the raw data received from the Public Bodies as at June 13, 2025.***

Subsequent to the close of the 2024-2025 financial year, the Director of Investigation requisitioned one hundred and ninety-four (199) Public Bodies, to provide details of the Contracts Cost Overruns and Variations incurred within the financial year, by May 19, 2025. As at the stipulated deadline date, the IC received submissions from one hundred and eighty-eight (188) Public Bodies, which represented a compliance rate of 94.5%, an increase in the compliance without the use of enforcement measures.

The information requested was relevant to all projects of value greater than J\$500,000.00, for which monetary disbursements for Cost Overruns, Variations, and/or Any Other Price Adjustments were made during the financial period 2024-2025. In this regard, the ACCOVR data which was submitted by the Public Bodies indicated that the combined goods, works and services contracts valued approximately J\$399.13 billion. The values of cost overruns, variations and any other price adjustments for the financial period were approximately J\$1.30 billion, J\$2.26 billion, J\$1.97 billion respectively.

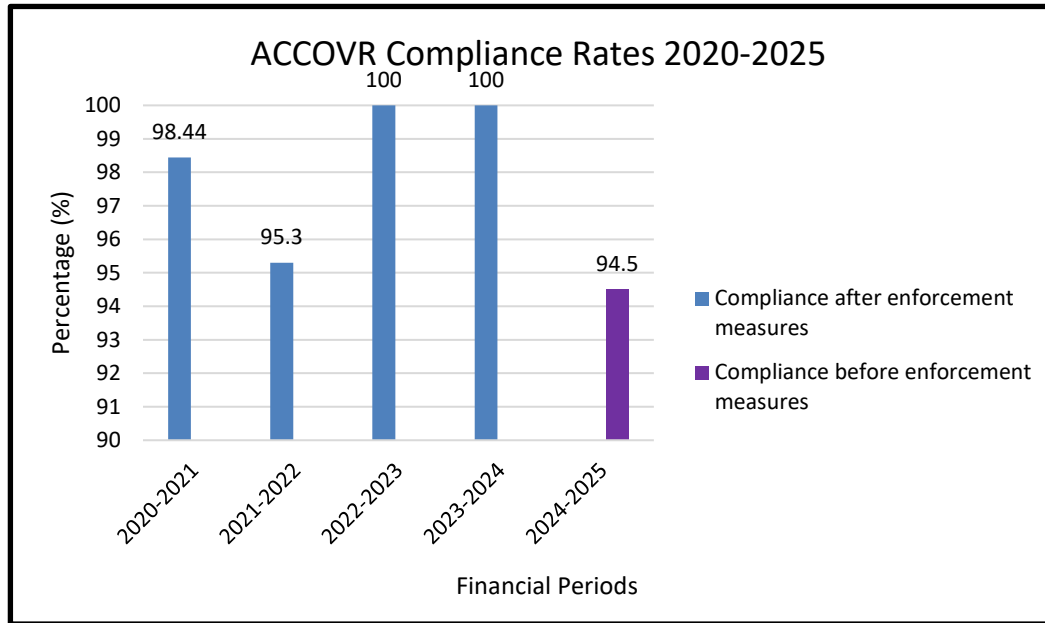
Update re ACCOVR for Financial Year 2023-2024

As at December 17, 2024, the Integrity Commission achieved a compliance rate of 100% (194 responsive Public Bodies) for the 2023-2024 financial period. It is to be noted that the compliance rate of the submission of ACCOVRs

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for the 2023-2024 financial period was achieved following an initiative by the Director of Investigation which involved serving summonses.

See compliance chart below which shows comparison of the ACCOVR compliance rates for periods 2020-2025 (after implemented compliance measures for each respective period):



ACCOVR Compliance Rates 2020-2025

The data analysis below is representative of the electronic submissions received for the relevant financial period. The results of the submissions are as follows:

Contracts Cost Overruns, Variations and Any Other Price Adjustments (AOPA) for Financial Period 2024-2025

Type of Contract	Total Contract Value (J\$)	Total Value Cost Overrun (J\$)	Total Value Variation (J\$)	Total Value Any Other Price Adj. (J\$)	% Cost Overrun	% Variation	% Any Other Price Adjustment (AOPA)
Goods	212.54B	28.56M	578.42M	30.24M	0.01	0.27	0.01
Works	139.22B	1.15B	1.26B	738.95M	0.83	0.91	0.53
Services	47.37B	119.50M	425.25M	1.20B	0.25	0.90	2.54
Goods/Works/Services	399.13B	1.30B	2.26B	1.97B	0.33	0.57	0.49

Goods contracts represent the highest value of contracts awarded, being approximately J\$212.54B or 53.25%, while Works was J\$139.22B or 34.88% and Services was J\$47.37B or 11.87%. The procurement of Works with

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0.83% had the highest percentage of cost overruns followed by Services and Goods with 0.25% and 0.01% respectively. Works contracts had the highest variations, with approximately 0.91%, followed by Services then Goods with 0.90% and 0.27% respectively. Services contracts had the highest percentage of price adjustments with approximately 2.54%, followed by Works, then Goods with approximately 0.53% and 0.01% respectively.

Annual Contract Cost Overruns and Variations for Goods, Works and Services Exceeding J\$5million

The ACCOV data for the procurement of goods, works and services exceeding J\$5million was reviewed and tabulated for the relevant financial period. The tables below indicate that the total variations were significantly higher than that of the total cost of overruns or any other price adjustments in most cases.

Annual Contract Cost Overruns and Variations for Goods, Works and Services Exceeding J\$5million for Financial Period 2024-2025

	Goods			Works			Services		
Procurement Thresholds	J\$5M to J\$30M	J\$30M to J\$60M	\$60M and above	J\$5M to J\$30M	J\$30M to J\$60M	J\$60M and above	J\$5M to J\$30M	J\$30M to J\$60M	J\$60M and above
Total Contract Value	16.07B	3.84B	176.67B	13.24B	5.33B	114.38B	14.62B	2.90B	17.70B
Cost Overrun	6.96M	15.45M	0	611.68K	16.02M	1.13B	97.91M	12.81M	0
Variation	40.11M	92.53M	287.94M	149.78M	85.09M	1.00B	150.81M	62.48M	154.13M
AOPA	9.38M	6.38M	6.44M	14.99M	0	719.71M	3.25M	0	1.20B

Of all categories of contracts valued \$60M and above, contracts awarded in the works category incurred the highest accumulative value for contract variation in the sum \$1.00 billion which was approximately 71.21% and 84.59% greater than the variations incurred for contracts awarded in the goods and services categories respectively.

Annual Contract Cost Overruns and Variations for Goods, Works and Services Exceeding J\$5million for Financial Period 2024-2025

	Goods			Works			Services		
Procurement Thresholds	J\$5M to J\$30M	J\$30M to J\$60M	\$60M and above	J\$5M to J\$30M	J\$30M to J\$60M	J\$60M and above	J\$5M to J\$30M	J\$30M to J\$60M	J\$60M and above
Total Contract Value	16.07B	3.84B	176.67B	13.24B	5.33B	114.38B	14.62B	2.90B	17.70B
Cost Overrun	6.96M	15.45M	0	611.68K	16.02M	1.13B	97.91M	12.81M	0
Variation	40.11M	92.53M	287.94M	149.78M	85.09M	1.00B	150.81M	62.48M	154.13M
AOPA	9.38M	6.38M	6.44M	14.99M	0	719.71M	3.25M	0	1.20B

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For contracts valued \$60M and above, only contracts awarded in the works category incurred a cost overrun, the total sum of which amounts to \$1.13billion.

Annual Contract Cost Overruns and Variations for Goods, Works and Services Exceeding J\$5million for Financial Period 2024-2025

	Goods			Works			Services		
Procurement Thresholds	J\$5M to J\$30M	J\$30M to J\$60M	\$60M and above	J\$5M to J\$30M	J\$30M to J\$60M	J\$60M and above	J\$5M to J\$30M	J\$30M to J\$60M	J\$60M and above
Total Contract Value	16.07B	3.84B	176.67B	13.24B	5.33B	114.38B	14.62B	2.90B	17.70B
Cost Overrun	6.96M	15.45M	0	611.68K	16.02M	1.13B	97.91M	12.81M	0
Variation	40.11M	92.53M	287.94M	149.78M	85.09M	1.00B	150.81M	62.48M	154.13M
AOPA	9.38M	6.38M	6.44M	14.99M	0	719.71M	3.25M	0	1.20B

Contracts awarded in the service category accounted for the highest value of contracts that were subject to any other price adjustment during the financial year 2024/2025 with a sum of \$1.20billion. This was followed by contracts awarded in the works category then those awarded in the services category.

Annual Contract Cost Overruns and Variations for Goods, Works and Services Exceeding J\$5million for Financial Period 2024-2025

	Goods			Works			Services		
Procurement Thresholds	J\$5M to J\$30M	J\$30M to J\$60M	\$60M and above	J\$5M to J\$30M	J\$30M to J\$60M	J\$60M and above	J\$5M to J\$30M	J\$30M to J\$60M	J\$60M and above
Total Contract Value	16.07B	3.84B	176.67B	13.24B	5.33B	114.38B	14.62B	2.90B	17.70B
Cost Overrun	6.96M	15.45M	0	611.68K	16.02M	1.13B	97.91M	12.81M	0
Variation	40.11M	92.53M	287.94M	149.78M	85.09M	1.00B	150.81M	62.48M	154.13M
AOPA	9.38M	6.38M	6.44M	14.99M	0	719.71M	3.25M	0	1.20B

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Comparison of Annual Contract Cost Overruns and Variations for Public Bodies with Goods Contracts Over \$100 Million

The Goods CCOV was selected for analysis for the financial period 2024-2025 as it was observed that it represented 53.25% of the number of contracts awarded. See table below.

Annual Contract Cost Overruns and Variations for Public Bodies with Goods Contracts Over \$100M (2024-2025)

Public Bodies	Total Contract Value (J\$)	Total Cost Overrun (J\$)	Total Value Variation (J\$)	Total Value Any Other Price Adj. (J\$)	% Cost Overrun	% Variation	% Any Price Adjustment	Other
Bank of Jamaica	2.32B	0	212.41M	0	0	9.14	0	
E-Learning Jamaica Company Ltd.	180.70M	0	0	0	0	0	0	
Electoral Office of Jamaica	170.08M	0	0	0	0	0	0	
Jamaica Civil Aviation Authority	150.16M	0	0	0	0	0	0	
Jamaica Constabulary Force	1.14B	0	2.53M	1.00M	0	0.22	0.09	
Jamaica Customs Agency	299.78M	0	0	0	0	0	0	
Jamaica Defence Force	206.06M	0	0	0	0	0	0	
Jamaica Fire Brigade	120.10M	0	0	0	0	0	0	
Ministry of Education, Youth and Information	172.57M	0	0	0	0	0	0	
Ministry of Health and Wellness	121.82M	0	0	0	0	0	0	
Ministry of National Security	2.02B	0	0	0	0	0	0	
Ministry of Science, Energy, Telecommunications and Transport	2.90B	0	0	0	0	0	0	
National Health Fund	353.99M	0	22.24M	0	0	6.28	0	
National Water Commission	978.38M	0	0	5.44M	0	0	0.56	
Petrojam Limited	160.98B	0	0	0	0	0	0	
Port Authority of Jamaica	124.34M	0	0	0	0	0	0	
South East Regional Health Authority	1.64B	0	0	0	0	0	0	
Western Regional Health Authority	498.43M	0	0	0	0	0	0	

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Comparison of Annual Contract Cost Overruns and Variations for Public Bodies with Works Contracts over \$100 Million

The Works CCOV was selected for analysis for the financial period 2024-2025 as it was observed that while it represented 34.88% of the contracts awarded, the individual contracts are typically great in value and of national significance. See table below.

Annual Contract Cost Overruns and Variations for Public Bodies with Works Contracts Over \$100M (2024-2025)

Public Bodies	Total Contract Value (J\$)	Total Value Cost Overrun (J\$)	Total Value Variation (J\$)	Total Value Any Other Price Adj. (J\$)	% Cost Overrun	% Variation	% Any Other Price Adjustment (AOPA)
Housing Agency of Jamaica Ltd.	1.75B	0	0	0	0	0	0
Jamaica Civil Aviation Authority	211.20M	0	0	0	0	0	0
Jamaica Social Investment Fund	1.95B	0	36.60M	0	0	1.87	0
Ministry of National Security	16.07B	131.79M	252.19M	38.62M	0.82	1.57	0.24
National Education Trust	4.71B	35.30M	240.99M	0	0.75	5.12	0
National Housing Trust	40.68B	968.59M	274.40M	676.35M	2.38	0.67	1.66
National Water Commission	1.24B	0	0	0	0	0	0
National Works Agency	36.94B	0	-26.65K	0	0	0	0
Office of the Prime Minister	211.94M	0	0	0	0	0	0
Petrojam Limited	2.55B	0	14.89M	0	0	0.58	0
Port Authority of Jamaica	2.29B	0	0	0	0	0	0
Urban Development Corporation (UDC)	240.18M	0	0	0	0	0	0
Western Regional Health Authority	215.58M	0	0	0	0	0	0
Westmoreland Municipal Corporation	107.34M	0	0	0	0	0	0

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Annual Contract Cost Overruns and Variations for Public Bodies with Services Contracts Over \$100 Million

The Services CCOV was also analysed for the financial period 2024-2025, representing 11.87% of the contracts awarded. See table below.

Annual Contract Cost Overruns and Variations for Public Bodies with Services Contracts Over \$100M (2024-2025)

Public Bodies	Total Contract Value (J\$)	Total Cost Overrun (J\$)	Total Value Variation (J\$)	Total Any Other Price Adj. (J\$)	% Cost Overrun	% Variation	% Any Other Price Adjustment
Bank of Jamaica	628.77M	0	23.76M	0	0	3.78	0
HEART/NSTA Trust	2.92B	0	0	0	0	0	0
ICT Authority (formerly eGov Jamaica Limited)	689.84M	0	0	0	0	0	0
Jamaica Civil Aviation Authority	478.84M	0	27.56M	136.73M	0	5.76	28.56
Jamaica Customs Agency	113.43M	0	3.62M	0	0	3.19	0
Jamaica Defence Force	122.72M	0	0	0	0	0	0
Jamaica Information Service	101.82M	0	0	35.56M	0	0	34.93
Jamaica Urban Transit Company (JUTC)	1.17B	0	0	0	0	0	0
Ministry of Education, Youth and Information	468.87M	0	0	0	0	0	0
Ministry of Finance and the Public Service	464.99M	0	21.96M	0	0	4.72	0
Ministry of National Security	456.35M	0	2.64M	0	0	0.58	0
National Health Fund	1.33B	0	0	484.69M	0	0	36.43
National Housing Trust	4.73B	0	0	538.77M	0	0	11.38
Passport, Immigration & Citizenship Agency (PICA)	395.58M	0	68.38M	0	0	17.29	0
Petrojam Limited	598.13M	0	0	0	0	0	0
Statistical Institute of Jamaica	104.89M	0	0	0	0	0	0
Western Regional Health Authority	720.92M	0	0	0	0	0	0

Discussion of Findings

During the period under review, the data indicated that Goods contracts were the highest quantity of contracts awarded and represented the highest value of contracts awarded, followed by the value of Works contracts awarded. Services contracts were the least number of contracts awarded over the period, with 11.87%.

The data also indicates that the percentage of cost overruns and variations during the period under review is between 0.01% to 2.54% which remains low.

List of Non-Complaint Public Bodies for 2024-2025

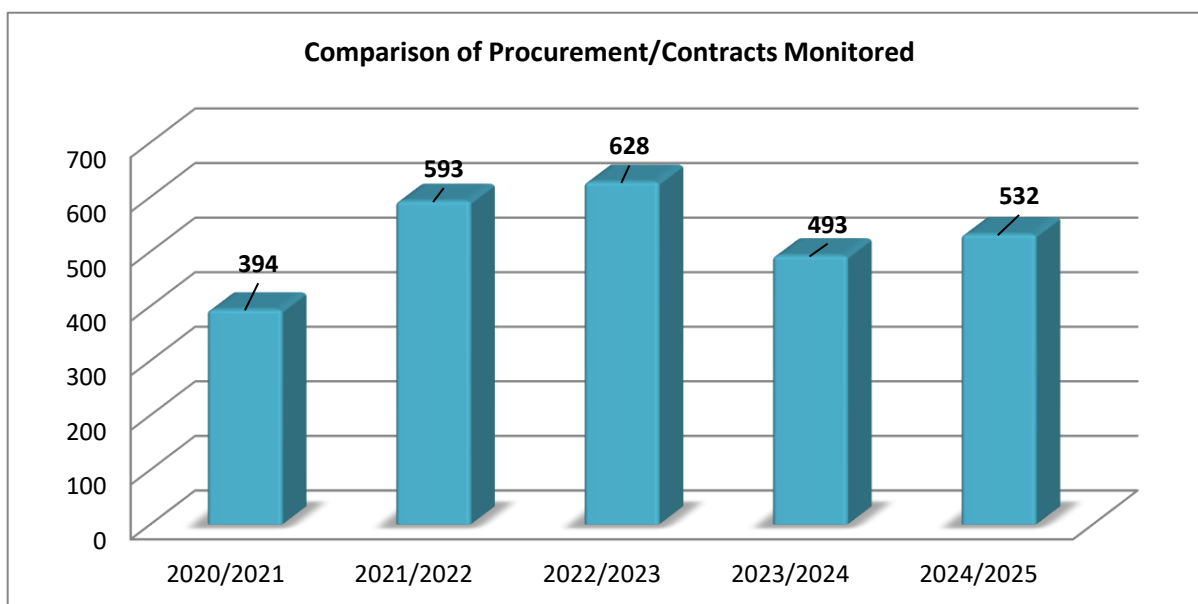
MDAs	
1	Child Protection and Family Services Agency
2	Houses of Parliament
3	Independence Park Limited
4	Institute of Forensic Science & Legal Medicine
5	Jamaica Agricultural Commodities Regulations Authority
6	Jamaica Ultimate Tyre Company Ltd
7	Kingston & St. Andrew Municipal Corporation
8	Ministry of Justice
9	National Commission on Science and Technology
10	Office of Disaster Preparedness and Emergency Management (ODPEM)
11	St. Catherine Municipal Corporation

Monitoring of Non-Construction Contracts

The Non-Construction Contracts Inspectorate (NCCI), pursuant to Section 33 of the Integrity Commission Act, monitors the award, implementation and termination of Goods and Services Contracts. During the course of the NCCI's monitoring activities, Inspectors are expected to attend, where required, Pre-bid Meetings and procurement-related meetings as well as to conduct verifications of procured items.

The NCCI is further tasked with the management/monitoring of several critical portfolios and where required, provides guidance to Public Bodies with respect to the procurement process.

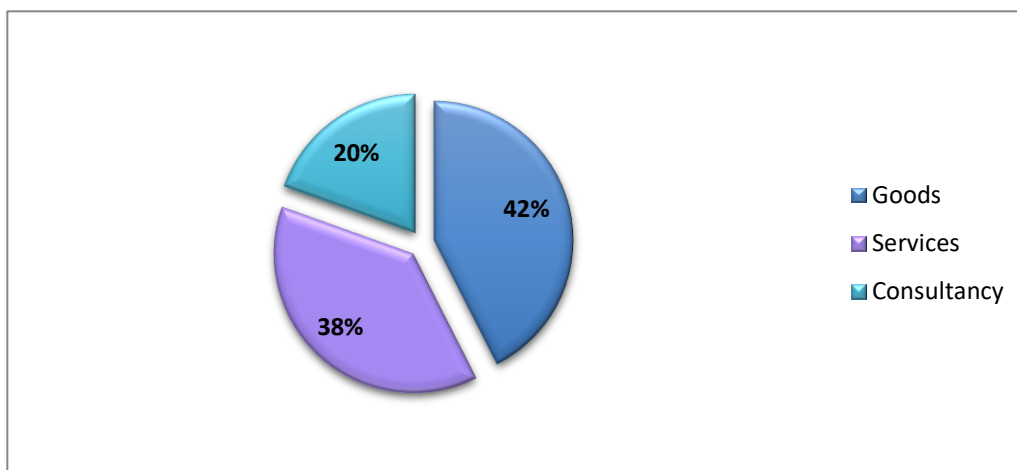
The structure of the NCCI allows for a complement of four (4) Inspectors, two (2) Senior Inspectors, whose role is Supervisory, an Administrative Assistant and a Manager. The NCCI operated with its full staff complement for the majority of the reporting period. For the reporting period, the Unit realized an increase in monitoring of new assignments, as well as an increase in sustained monitoring which is attributable to the sub-unit being fully staffed. The Unit monitored five hundred thirty-two (532) procurement opportunities/contracts during the period April 1, 2024, to March 31, 2025. The estimated value of the contracts monitored, which were at varying stages of the procurement process, was approximately JMD\$45 billion.



Thirty-eight percent (38%) of the contracts monitored by the Unit were service-related, such as security services, janitorial services and maintenance contracts. The Unit monitored one hundred eighty-five (185) 'goods' type contracts, which were comprised of, among other things, procurement of motor vehicles, medical equipment, and information and communications technologies (ICT) equipment, etc.

INTEGRITY COMMISSION

Consultancy type contracts represented twenty percent (20%) of the projects monitored, and included consultancies related to the provision of construction-related services and information technology solutions.



During the period, Inspectors within this sub-unit were assigned two-hundred and four (204) new procurement opportunities. The remaining three hundred and twenty-eight (328) projects were carried forward from previous periods. Ninety-seven (97) of the projects which were being monitored either concluded or were aborted during the reporting period.

Reports Completed April 1, 2022 to March 31, 2025			
	2022/2023	2023/2024	2024/2025
Final Monitoring Reports	133	68	76
Tender Opening Reports	8	1	0
Site Visit/Meeting/Verification Reports	26	14	45

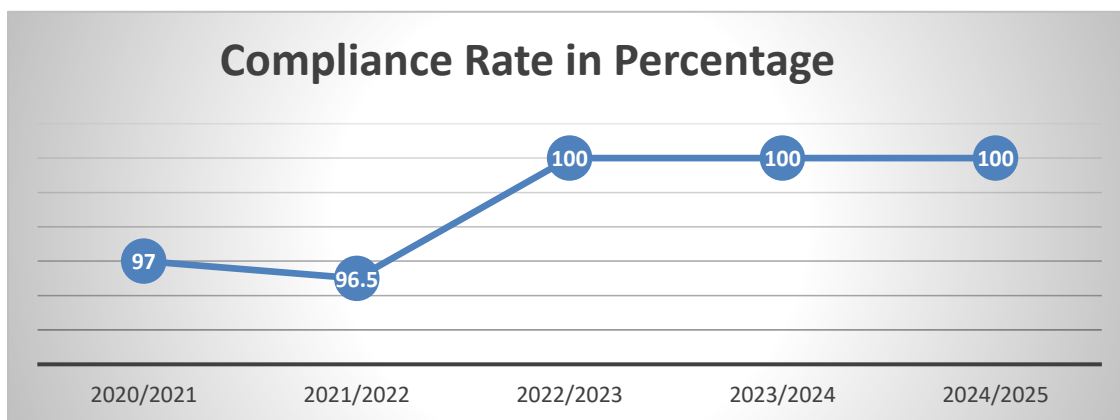
Quarterly Contracts Awards Reports (QCAR)

The Integrity Commission, in keeping with the provisions of Section 51 of the Integrity Commission Act, requires Procuring Entities, on a quarterly basis, to provide the particulars of contracts awarded above Five Hundred Thousand Dollars (J\$500,000.00), within one (1) calendar month following the ending of the quarter to which they relate. Approximately one hundred and ninety-eight (198) Public Bodies are required to prepare and submit Quarterly Contract Awards (QCA) Report to the Director of Investigation.

INTEGRITY COMMISSION

For the period April 01, 2024 to March 31, 2025, the Commission recorded an average compliance rate of 99%. Reports were not received from two Procuring Entities, namely St. Catherine Municipal Corporation and Jamaica Ultimate Tyre Company Limited.

QCAR Compliance Rate Over the Past 5 Year



Contract Award Data

The Commission's web portal recorded a total of 32,838 contracts awarded for the period of April 01, 2024 through to March 31, 2025.

The total value of contracts awarded for the period was \$311,126,034,500.86 The value of contracts for Goods and Services inclusive of Consulting and Insurance Placement Services was \$266,069,783,172 while the value of Works contracts was \$45,056,251,329.

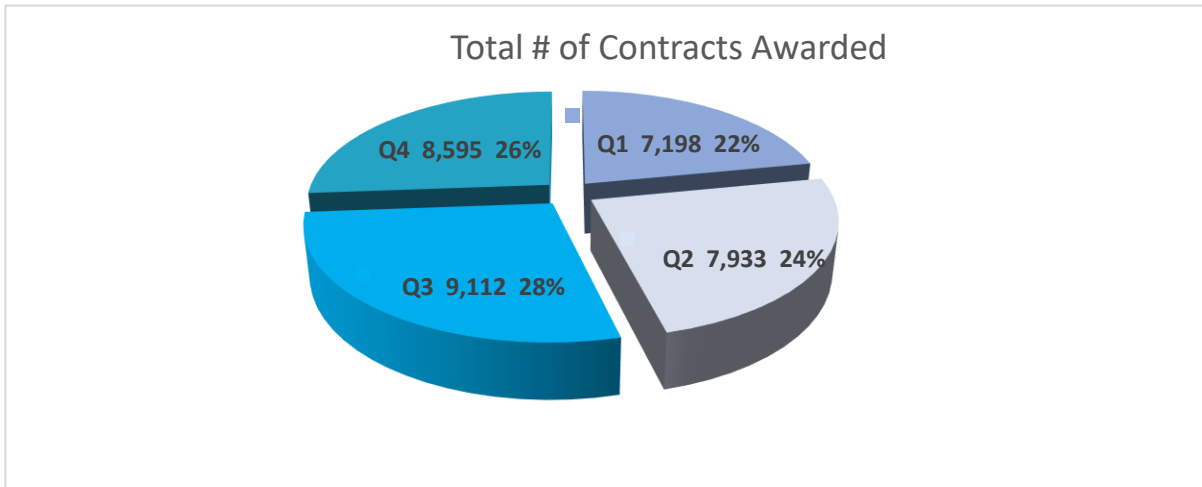
Summaries of the information collated are represented below:

Summary of Contracts Awarded

Quarter	Total # of Contracts Awarded	Total value Goods Contracts	Total Value of Service Contracts	Value of Works Contracts	Total Value of Contracts
Q1	7,198	\$36,996,865,201.88	\$10,780,523,898.38	\$9,295,453,060.84	\$57,072,842,161.10
Q2	7,933	\$65,771,333,642.61	\$10,383,717,845.86	\$12,323,121,400.91	\$88,478,172,889.38
Q3	9,112	\$39,512,725,418.49	\$15,878,100,621.01	\$9,570,843,923.86	\$64,961,669,963.36
Q4	8,595	\$68,879,269,751.12	\$17,867,246,792.31	\$13,866,832,943.59	\$100,613,349,487.02
Total	32,838	211,160,194,014	54,909,589,158	45,056,251,329	\$311,126,034,500.86

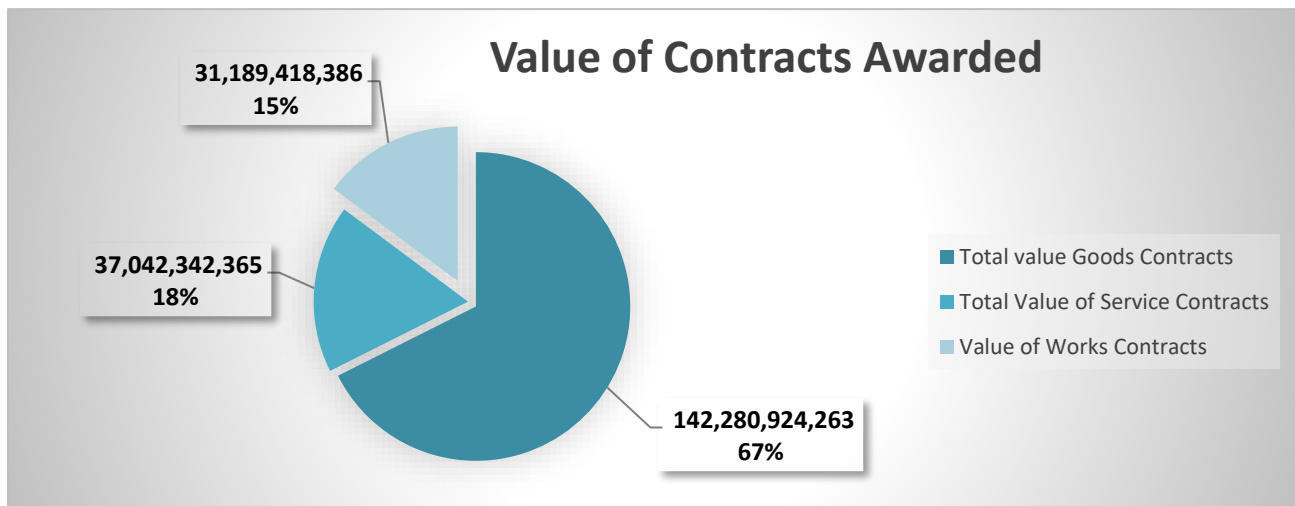
Total Number of Contracts Awarded per Quarter

The majority of the contracts awarded during the financial year 2024/2025 were awarded during the third quarter (Q3), that is, the period between October and December 2024, and the least number of contracts awarded during the first quarter (Q1), or the period between April through June 2024 (Refer to pie chart 1). Notwithstanding, the total value of contracts awarded during the fourth quarter (Q4- January -March 2025), accounted for the majority of the overall expenditure at 32% or \$100,613,349,487.02 of the total spend.



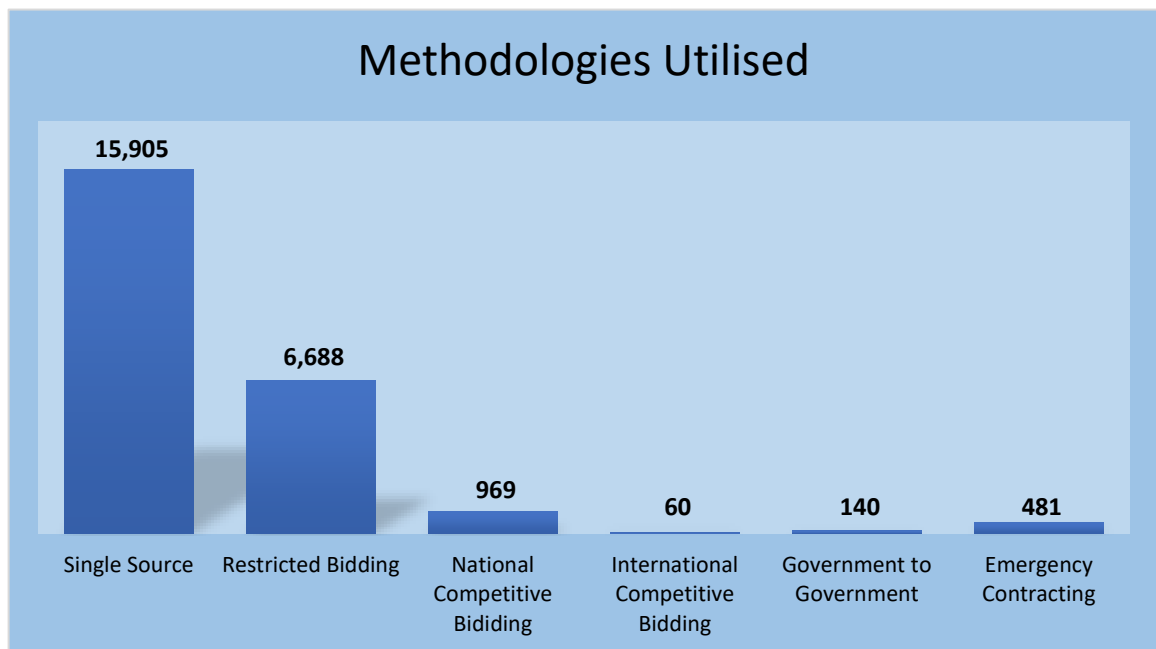
Value of Goods, Works and Services Contracts Awarded as a Percentage of Overall Contract

The aggregate amount spent on goods by procuring entities exceeds the value of works undertaken and the value of services acquired, combined. The value of goods contracts awarded accounted for 68% of the total value of contracts awarded or \$ 211,160,194,014, total procurement expenditure for the financial year 2024/2025. Services acquired accounted for 18% or \$54,909,589,158 total procurement expenditure, while infrastructural works accounted for 14% or \$45,056,251,329 the total procurement expenditure.



Procurement Methodologies Utilized

Over the course of the financial year under review, the Single Source Methodology was reported as the most utilized method of engagement for procuring entities. Of the 32,838 contracts awarded, 21,406 or 65% were issued using this non-competitive procurement method of engagement whilst the most competitive bidding methodology- International Competitive Bidding, was used to award only 72 contracts, less than 1% of the aggregate number of contracts awarded. Further, 564 contracts which equates to 1.7% of the total number of contracts awarded during the period were issued via the emergency contracting while 192 of the contracts awarded, were government to government engagements. Only 4% or 1,375 contracts were awarded using the National Competitive Bidding methodology while 9,229 or 28% of contracts were reported as awarded out of a Restricted Bidding procurement process.



Value of Contracts Awarded based on Procurement Methodology Employed

Notwithstanding that the number of contracts awarded using the Restricted Bidding Methodology accounted for only 28% of the total number of contracts awarded during the financial year, the aggregate value of same, amounts to \$192,023,955,809 or 62% of the total value of all contracts awarded over the period. The value of the contracts awarded using the Single Source methodology amounted to \$61,686,401,642, which represent only 20% of the total value of all contracts awarded. The percentile values of the contracts awarded using National Competitive Bidding, International Competitive Bidding, Government to Government and Emergency Contracting are 12%, 3%, 0.3% and 4% respectively.



Parliamentary Exemptions

Section 41 of the Constitution of Jamaica, provides, *inter alia*, that save for such circumstances in which an exemption is granted by the House of Parliament to a Member of Parliament, the seat of a Member of either house shall become vacant, if (a) the Member becomes a party to any contract with the Government of Jamaica, (b) the Member is a partner in a firm or a director or manager of a company which becomes a party to such a contract, or (c) the member becomes a partner in a firm or director or manager of a company which is itself a party to such a contract.

The Integrity Commission, in its continued effort of secure greater transparency and probity in the award and implementation of all Government contracts to Parliamentarians, requested from the Clerk of the Houses of Parliament information on the Exempted Motions which were moved and approved in respect of Parliamentarians during the financial year 2024/2025.

The following represents the sole Exemption Motion which was granted as advised by the Clerk of the Houses of Parliament:

Senator, Professor Floyd Morris, March 28, 2025

The exemption which was granted in respect of Senator Floyd Morris, recognized that the Senator, “*is a Consultant who may from time to time enter into contracts with the Government of Jamaica and its affiliated agencies.*”

Licence And Asset Divestment/Acquisition Unit

The Licence and Asset Divestment/Acquisition (LADA) Unit, established in July 2020, monitors the grant, revocation and suspension of prescribed licences, the divestment/acquisition of land and other assets inclusive of those divested/acquired *via* Public Private Partnerships

The LADA Unit is comprised of one (1) Manager, two (2) Senior Inspectors and three (3) Inspectors. For the reporting period, the Unit had one (1) vacancy for an Inspector.

The table below provides a summary of the activities undertaken by the LADA Unit within the Financial Year 2024/2025:

Summary of Activities undertaken by the LADA Unit – Financial Year 2024/2025

Licence and Permits Monitoring Activity April 1, 2024 - March 31, 2025					
Activity	Licence	Land	Asset Divestment	Acquisition	Public Private Partnership
Number of Projects Monitored	248	192	27	3	10
Number of Tender Opening Attended	3	5	4	-	-
Number of Site Visits	19	8	4	-	0
Number of Land Divestment Policy Framework Meetings Monitored	N/A	0 ¹⁰	N/A	N/A	N/A
Number of Land Divestments Advisory Committee (LADC) Meetings Monitored	N/A	6	N/A	N/A	N/A
Number of SCJ Holdings Limited Land Divestment Committee Meetings Monitored	N/A	8	N/A	N/A	N/A
Number of Meetings held with Public Bodies	4	3	0	0	0
Number of Technical Review Committee Meetings Monitored	12	N/A	N/A	N/A	N/A

The Unit successfully initiated the soft launch of its Land and Asset Divestment, Public Private Partnership and Acquisition System (LADPAS) in March 2025. Twelve (12) Public Bodies were requisitioned to provide the Integrity Commission with detailed particulars concerning all Land, Asset Divestment, Public Private Partnership and Acquisition transactions executed by them during the period July 1, 2024 to December 31, 2024 by May 30, 2025. The Public Bodies were chosen from the list of Public bodies that are currently engaged in land and asset divestment and/ or acquisition and Public Private Partnership (PPP) arrangements.

¹⁰ No Meetings held during the Financial Year

INTEGRITY COMMISSION

The system is aimed at capturing, on a bi-annual basis, all divestment and acquisitions undertaken for which Agreements have been executed, as well as, particulars on divestment and acquisition transaction commenced, but for which Agreements have not been executed during the reporting period.

The twelve (12) Public Bodies selected are as follows:

1. National Land Agency;
2. Development Bank of Jamaica;
3. Urban Development Corporation;
4. Ministry of Economic Growth and Job Creation;
5. SCJ Holdings Jamaica Limited;
6. Factories Corporation of Jamaica;
7. Tourism Product Development Company;
8. National Road Operating & Constructing Company Limited (NROCC);
9. Port Authority of Jamaica;
10. St. Catherine Municipal Corporation;
11. National Housing Trust; and
12. Housing Agency of Jamaica.

Additionally, the Unit is currently conducting the post implementation analysis of the Prescribed Licence Information Database Pilot, which saw an average compliance rate of 75%. One of the major challenges noted was the large number of licences issued by some Public Bodies and that some of these Public Bodies already had a system that stored all their information regarding licences issued, revoked or rejected. As a result, the completion of the Prescribed Licensing Quarterly Report proved to be more tedious than anticipated. In an effort to alleviate this issue, the Unit and the IC's Information Technology Business Process Unit undertook the development of an Extensible Markup Language template which will support information exchange between the PLID database and the existing Databases of the Public Bodies which already maintain a database of Prescribed Licenses issued.

Monitoring of Committees

During the year under review, the Unit continued to monitor the activities of the following Committees remotely:

1. SCJ Holdings Limited Land Divestment Monitoring Committee;
2. Technical Review Committee – NRCA and NEPA; and
3. Land Divestment Advisory Committee (LDAC).

INTEGRITY COMMISSION

Prescribed Licences and Permits

During the year, the Unit commenced the monitoring of the grant of thirty-four (34) new licences bringing the total number of licences actively monitored for the period to two hundred and forty-eight (248). Licences were monitored across the following sectors:

Licences Monitored within varied Sectors

Sector	No Monitored
Telecommunication and Spectrum	22
Air Service	22
Water Abstraction and Well Drilling	85
Mining	18
Transportation	1
Spirit Licences	1
Game Bird Shooting	1
Removal of "Limited" – Charitable Organizations	47
Utilities - Sewerage	2
Importation	3
Environmental Permit	34
Extraction of Timber	2
Fishing/Vessel Licences	5
Total	248

In undertaking the monitoring function, a review of the existing internal policies and procedures of each licensing authority including the relevant legislation is undertaken to ascertain whether licences were issued/revoked or varied in compliance with the applicable legislation and governing policies.

Asset Divestment and Public Private Partnership/Acquisition Monitoring

The LADA Unit continued its monitoring of the divestment of Government-owned lands and assets, as well as, Public Private Partnership and Acquisition activities for the reporting period in accordance with the prescribed, policies, regulations and legislations.

INTEGRITY COMMISSION

One hundred and ninety-two (192) GOJ land divestment processes were monitored by the Unit, inclusive of a number of divestments that were previously being monitored but were re-advertised. The Unit commenced the monitoring of twenty (20) new Land Divestment opportunities during the period under review. Notwithstanding, several divestment opportunities still await re-advertisement due to lack of offers or lack of responsive offers. Additionally, the Unit monitored a total of twenty-eight (28) Asset Divestment activities, seven (7) of which were new opportunities. The Unit maintained its monitoring of ten (10) Public Private Partnership opportunities and three (3) Acquisition transactions.

The Land Divestment Advisory Committee (LDAC)

The Land Divestment Advisory Committee (LDAC) is responsible for evaluating applications from the Commissioner of Lands and making recommendations to the Minister with responsibility for Crown Lands. The Committee plays only an advisory role to the Minister in respect of the divestment of government-owned lands and the members of this Committee is appointed by the Minister for a period of three (3) years. The current Land Divestment Advisory Committee (LDAC) was appointed for a term of three (3) years effective July 29, 2024. Its membership was approved by the Cabinet vide Decision No. 27/24 dated July 29, 2024. No change was made to the Committee's membership during the 2024 to 2025 Financial Year.

During the reporting period, the Unit remotely monitored six (6) meetings held by the referenced Committee.

During the period April 1, 2024, to March 31, 2025, the LDAC reported that it recommended fifty-nine (59) applications at an estimated revenue of \$5,248,606,514.00 for Ministerial approval.

Applications Recommended for Lease by Land Use and Value for the 2024 – 2025 FY

Land Use	No. of Applications	Value (\$)
Residential	5	121,000.00
Agricultural	5	1,237,000.00
Residential & Agricultural	-	-
Commercial/Industrial	7	4,368,000.00
Institutional	1	24,000.00
*Other	1	650,000.00
Total	19	6,400,000.00

* Resort, recreational, community development and easement.

INTEGRITY COMMISSION

Applications Recommended for Sale by Land Use and Value for the 2024 – 2025 FY

Land Use	No. of Applications	Value (\$)
Residential	23	273,333,034.00
Agricultural	6	23,953,180.00
Residential & Agricultural	2	12,870,000.00
Commercial/Industrial	1	200,000.00
Institutional	1	850,000.00
*Other	2	4,931,000,000.00
Total	35	5,242,206,214.00

* Resort, recreational, community development and easement.

Applications Recommended for Transfer by Land Use and Value for the 2024 – 2025 FY

Land Use	No. of Applications	Value (\$)
Residential (sale)	2	300.00
Agricultural (sale)	2	0.00
Total	4	300.00

***Transfer** – The LDAC recommended a total of four (4) applications for the transfer of properties. Two (2) for residential properties and two (2) for agricultural properties. Three (3) applications were at no consideration at a value of \$0.00. One (1) application for a residential lot was at \$300.00.

INTEGRITY COMMISSION

Applications Recommended for Exchange by Land use and value for the 2024 – 2025 FY

Land Use	No. of Applications	Value (\$)
Residential (sale)	1	-200,000.00
Total	1	-200,000.00

***Exchange** – The LDAC recommended the exchange of a residential property valued at \$4,300,000.00 for another residential property valued at \$4,500,000.00.

SCJ Holding Limited Land Divestment and Monitoring Committee Meeting

The SCJ Holdings Limited (SCJH) is wholly owned by the Government of Jamaica and manages sugar lands owned by the Government of Jamaica. The SCJH is tasked with putting its land assets to use by attracting investors in areas such as mining, housing and agriculture. Proposals received by the company are submitted to its Land Divestment and Monitoring Committee for review and approval and further referral to the full Board of Directors. The SCJH advised that during the reporting period there had been no change to the composition of the Committee.

The LADA Unit remotely monitored the proceedings of the eight (8) Land Divestment and Monitoring Committee meeting during the reporting period.

The Land Divestment and Monitoring Committee reported that it considered one hundred and thirteen (113) submissions of which one hundred and nine (109) were approved by the Committee and referred to the Board for its consideration, while two (2) submissions were rejected and two (2) deferred/withdrawn.

Breakdown of Submission Recommended to Board

Request	Approved by Committee	Rejected	Deferred/Withdrawn	Total
Lease	94	2	2	98
Option to Lease	1	-	-	1
Transfer of Fee Simple Interest	4	-	-	4
Licence	4	-	-	4
Consent	3	-	-	3
Variation	3	-	-	3
Total	109	2	2	113

Technical Review Committee Meeting

The Technical Review Committee (TRC) operates as a sub-committee of both the Natural Resources Conservation Authority (NRCA) and the Town and Country Planning Authority (TCPA). Its core mandate is to deliberate on development applications and provide informed recommendations to the Authorities regarding their approval or refusal, in accordance with its established Terms of Reference.

During the financial year, the TRC continued to play a vital role within the national environmental and planning regulatory framework. As a key technical advisory body, the Committee reviewed and assessed a broad range of applications for licences, permits, and other approvals, ensuring alignment with national policies and the relevant legislative and regulatory requirements.

The LADA Unit remotely monitored the proceedings of twelve (12) scheduled meetings. A total of Eight-Hundred and Ninety-Three (893) submissions were reviewed.

The Technical Review Committee reported the total numbers of submissions deliberated upon by the committee for the financial year April 1, 2024, – March 31, 2025, as illustrated in the table below:

Total Applications Deliberated on by the Committee

Item	Description	Total Number
1	Total applications deliberated	893
2	New	643
3	Re-Submissions	
	✓ Amendments	82
	✓ Renewals	168
4	Total number of applications recommended for approval	855
5	Total number of applications deferred	7
6	Total number of applications recommended for refusal	31

Evaluation and Review of The Policy Framework and Procedures Manual for The Divestment of Government-Owned Lands 2015

The Land Divestment Policy Framework Committee was established to review the Policy Framework and Procedures Manual for the Divestment of Government-owned Lands (2015) which aims to harmonize the various mechanisms and procedures of public sector entities which are custodians of government lands. The main goal of the Policy Manual is to foster *“increased transparency and efficiency in the process by which government-owned lands are divested by all public sector entities”*. The Policy Manual was developed particularly for the Divestment of Crown Lands; however, Agencies involved in the divestment of other Government-owned lands are required to adopt the Policy to *“ensure standardization and harmonization of land divestment policies and practices among all government entities involved in divestment.”*

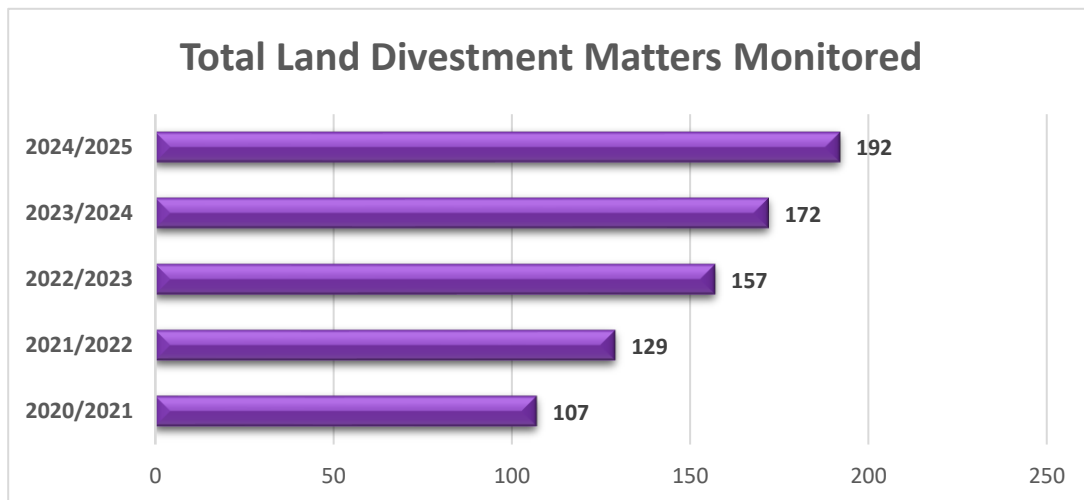
INTEGRITY COMMISSION

No Committee meetings were held during the reporting period and we continue to advocate for the resumption of these review meetings to facilitate input from the various stakeholders given the importance of having a comprehensive standardized Policy Manual to guide Practitioners.

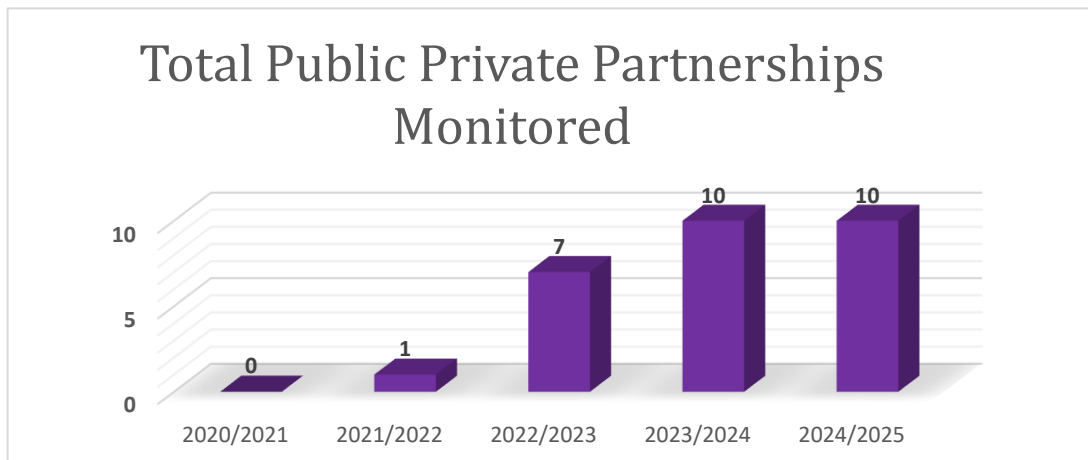
Five Year Analysis

In 2020, the Commission, in keeping with the Integrity Commission Act, extended its portfolio to include the monitoring of Licence, Asset Divestment and Acquisition through the establishment of the LADA Unit. The monitoring activities of the Unit throughout the period July 2020 to March 31, 2025 is encapsulated in the charts below:

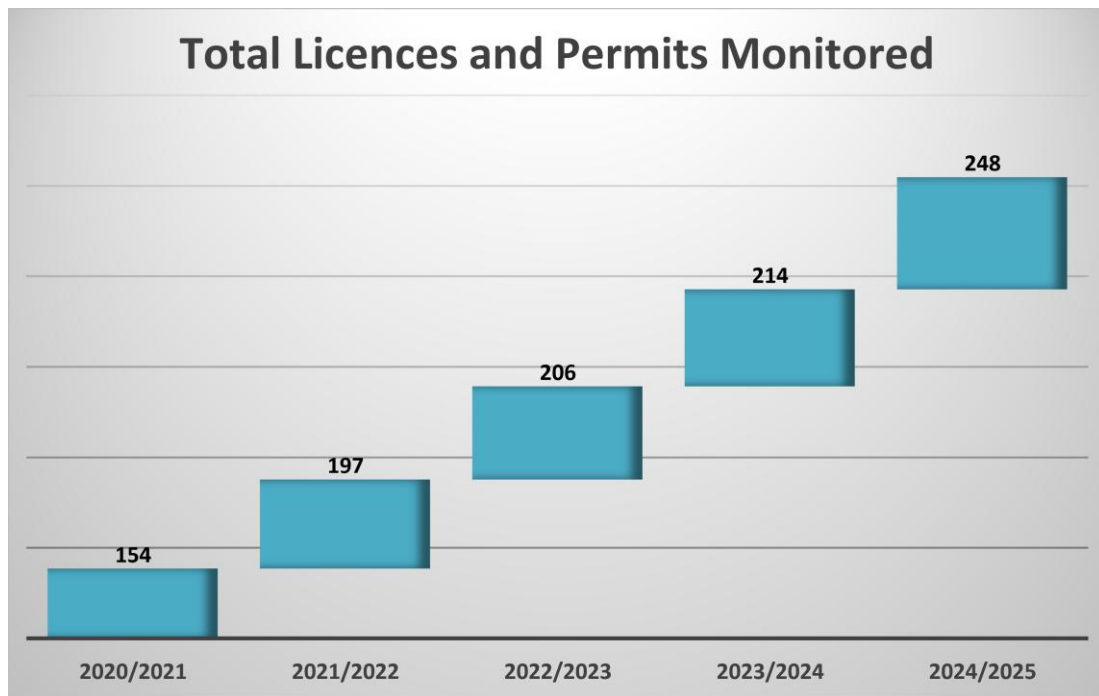
Total Land Divestment Matters Monitored



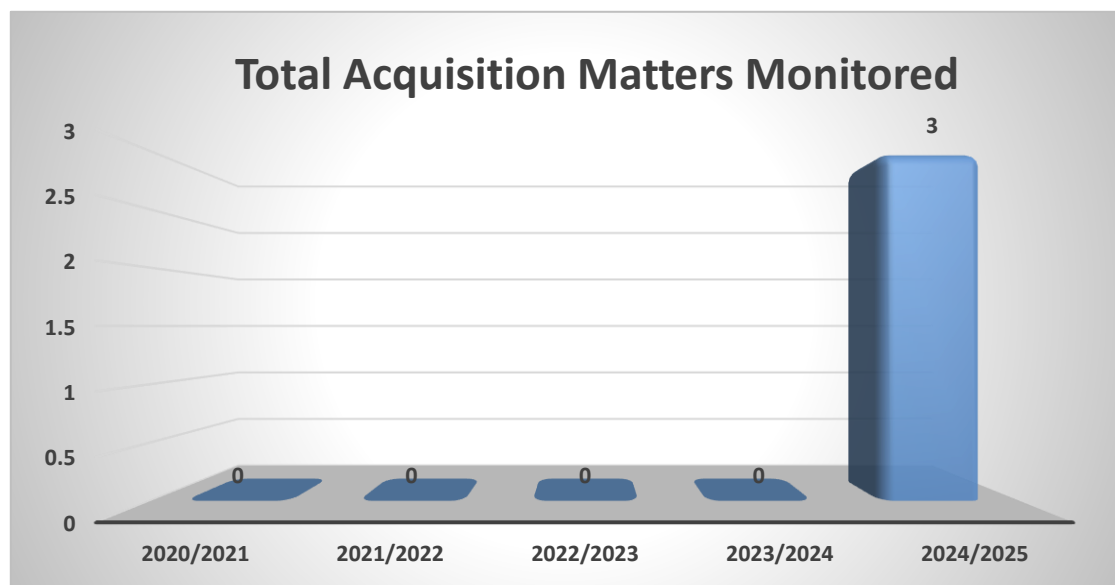
Total Public Private Partnerships Monitored



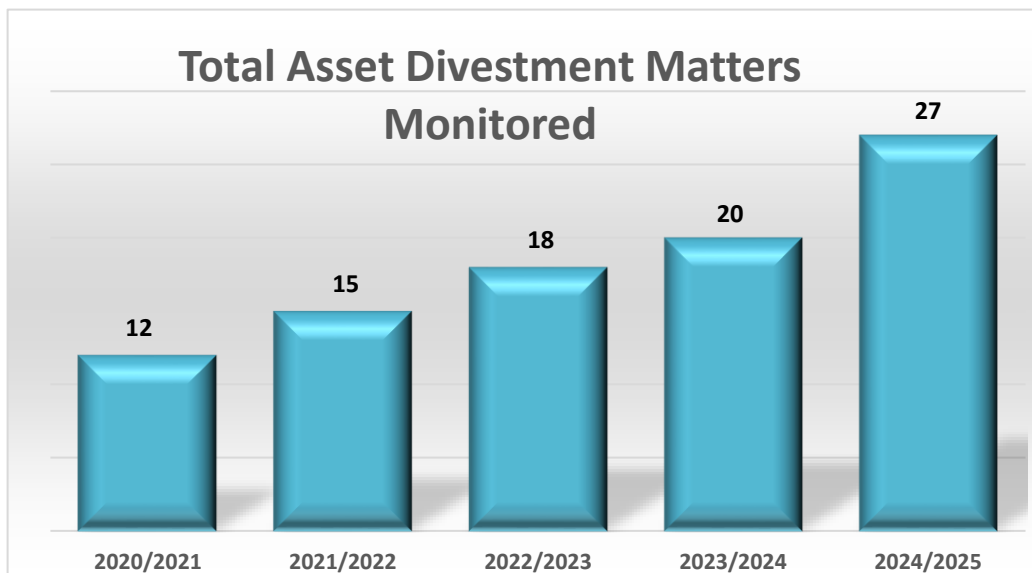
Total Licences and Permits Monitored



Total Asset Acquisition Matters Monitored



Total Asset Divestments Matters Monitored



Comparison of Reports Completed – July 1, 2020 to March 31, 2025

Reports Completed July 1, 2021 to March 31, 2025						
Description	2020/ 2021	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	Total
Final Monitoring Reports	5	34	28	32	19	118
Termination Reports	1	2	11	0	2	15
Close Out (Ultra Vires) Reports	10	10	0	9	0	29
Thematic Reports	0	1	1	0	0	2
Tender Opening Report	11	13	6	7	12	49
Site Visit Reports	1	7	15	15	31	69
Preliminary Investigation Reports	0	1	0	0	0	1
Enquiry Management Reports	7	2	0	0	0	9
Summary Reports (for transfer to CPCI)	0	1	3	0	1	5
Memorandum to Close	N/A	N/A	N/A	11	0	11
Initial Investigation Reports	1	3	0	0	0	4
Total No. of Reports	36	74	64	74	65	312

Other Activities

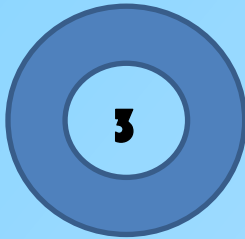
As part of the Integrity Commission's Good Governance sensitization series, the Unit conducted one (1) presentation entitled "*The Integrity Commission's Anti-Corruption Good Governance Sensitization Workshop Series*" Presentations were made to members of the Fair Trading Commission on September 13, 2024.

Chapter 7 - Corruption Prosecution Division

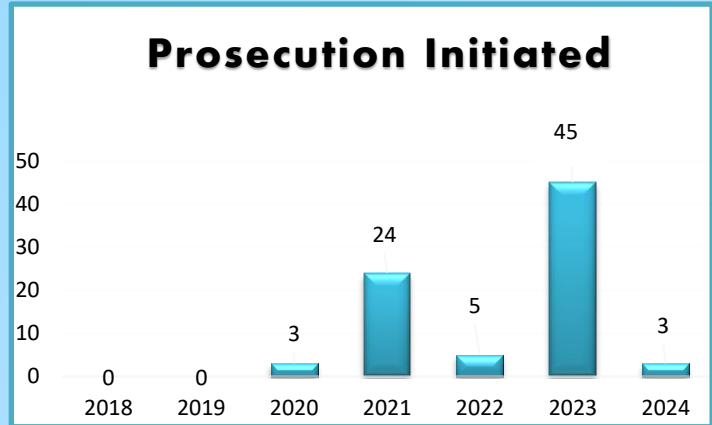
Corruption Prosecution Division Dashboard

Financial Investigation Matters Within the Division

Current Reporting Period

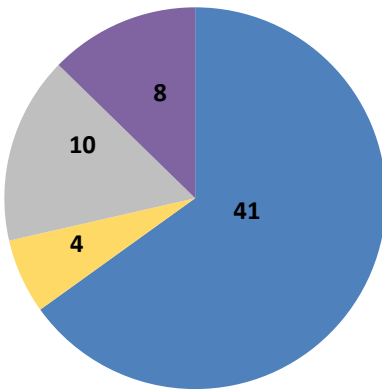


Seven Year Comparison Chart



Status of Matters in the Division

Current Reporting Period

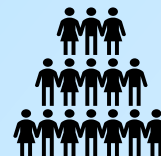


- Summons to be Issued/Reissued
- Prosecution Ongoing
- Prosecution Completed/File Closed (to include referrals carried over from previous reporting periods)
- Dormant Referral(s)

Seven Year Comparative Chart

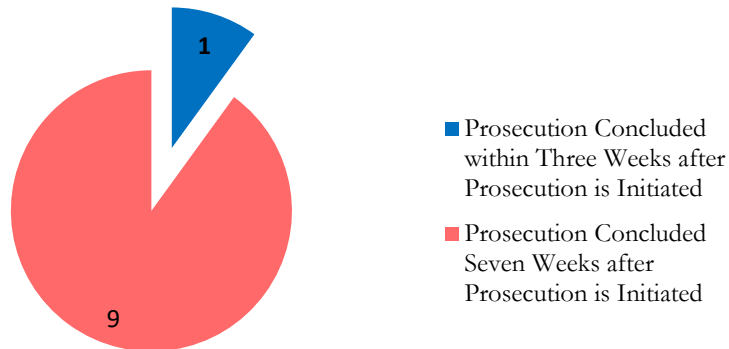


Human Resource



64%
(7 of 11 Staff Members)

**TIME TAKEN TO DISPOSE OF MATTERS
WHERE CHARGE IS LAI**



During the period under review, ten (10) matters were concluded with convictions recorded. Eight (8) of those matters were offences concerning **Failure to File Statutory Declarations** while the remaining two (2) matters related to **Making a False Statement in a Statutory Declaration**.

In one (1) matter, the Declarant pleaded guilty on the first occasion but was not sentenced until one (1) week and six (6) days later.

The disposal of the other nine (9) matters ranged between eight (8) weeks to sixty-nine (69) weeks. The Declarants eventually pleaded guilty in all nine (9) matters but they did so at various stages of the court proceedings. The prolonged periods of disposal were due to several factors that fell outside of the CPD's control. These factors include, but are not limited to: the unavailability of a presiding judge, multiple adjournments at the request of defence counsel to take instructions and, time allowed to Declarants to source funding to pay the fines that were ultimately imposed at sentencing.

INTEGRITY COMMISSION

Matters Referred to the Corruption Prosecution Division for the Period Ending March 31, 2025

TYPE OF REFERRAL	NO. OF MATTERS REFERRED	NO. OF MATTERS RULED FOR CHARGES TO BE LAID	NO. OF MATTERS INVESTIGATED WHICH RESULTED IN PROSECUTIONS	NO. OF MATTERS RULED FOR NO CHARGES TO BE LAID	NO. OF DISCHARGE LIABILITY NOTICE APPROVED	NO. OF DISCHARGE LIABILITY NOTICES NOT APPROVED	NO. OF MATTERS WHERE ADDITIONAL INFORMATION IS REQUIRED	NO. OF MATTERS UNDER REVIEW AT CLOSE OF REPORTING PERIOD
Special Reports of Investigations	1	1	1	0	N/A	N/A	N/A	N/A
Financial Investigation Referrals	3	1	1	1	N/A	N/A	1	0
Discharge Liability Notice	6	N/A	N/A	N/A	6	0	0	0
Total	10	2	2	1	6	0	1	0

During the reporting period, the Corruption Prosecution Division (CPD) received from the Investigation Division (ID): three (3) referrals during the second (2nd) quarter and; one (1) referral during the third (3rd) quarter; bringing the total number of referrals to four (4). Three (3) of these matters were Financial Investigation matters and the other concerned a Non-Financial/Special Report matter. Of the four (4) matters referred during the period: two (2) were recommended for prosecution, no charges were laid in another and, the final matter was returned to the Investigation Division for the file to be completed. Prosecutions have been initiated in the two (2) matters where positive rulings for prosecution were made; these matters are ongoing as at the close of the period.

During the period, the CPD also received and approved six (6) Discharge Liability Notices that were referred from the Information and Complaints Division.

Referrals Received Prior to the Period

During the reporting period, prosecutions were initiated and concluded in respect of two (2) of the three (3) matters that were referred during the fourth (4th) quarter of the previous period (2023/2024). Prosecution has also been initiated in respect of the third (3rd) matter but it remains ongoing as at the close of the period. It should be noted that this matter was reported as 'under review' at the close of the previous reporting period.

Of the three (3) referrals received during the third quarter (3rd) of the 2023/2024 period, two (2) were ruled for prosecution, and no charges were laid in the other. Prosecutions were subsequently initiated and concluded during the period in respect to the former. Notably, two (2) of the three (3) aforementioned referrals were matters that were also 'under review' as at the close of the preceding period (2023/2024).

Prosecutions have also now been concluded in respect of all four (4) remaining matters that were referred during the second (2nd) quarter of the 2023/2024 period.

Of the thirty-nine (39) referrals received in the third (3rd) quarter of 2022/2023, one (1) was successfully prosecuted during the period. Prosecution could not be initiated in the remaining thirty-eight (38) matters however, due to 'evasion of service' on the part of the Declarants on whom the services of summonses were attempted.

At the close of the previous period (2023/2024), eight (8) matters were designated and reported as "dormant". The dormancy protocol was activated on these matters pursuant to an internal prescribed divisional policy. A matter becomes dormant following several unsuccessful attempts of effecting service of a summons on a Declarant. During the reporting period, in an attempt to revive the dormant matters, the CPD engaged the Intelligence & Witness Management Unit of the Investigation Division to assist in gathering new information to locate the Declarants concerned. As at the end of the reporting period however, no further or better particulars were obtained, thus, the eight (8) matters remain dormant.

Activities Undertaken During the Reporting Period

The Corruption Prosecution Division (CPD), as part of its mandate, has responsibility for determining at the conclusion of an investigation, if so referred, what criminal charges, if any, may be brought against the subject matter of an investigation, who it is alleged, on the evidence presented, to have committed an act of corruption, being either an offence arising under the common law or any enactment. In addition to its core functions, the CPD offers support to the other Statutory Divisions, and, to a larger extent, the Commission itself.

First Quarter

- 1 During the first quarter of the period, the CPD was asked to provide an opinion regarding the ***Electronic Transactions Act***, particularly with respect to whether the Information & Complaints Division (ICD) could serve notices electronically and what impact that course, if undertaken, would have on prosecutions.

The Commission's annual review exercise of the Serious Organised Crime and Anti-Corruption Programme (SOCAP) under the MOU with the Foreign, Commonwealth & Development Office (FCDO) was undertaken during this quarter; the CPD was an instrumental contributor. A SOCAP Partners Capacity Assessment Meeting was convened by Mr. Francis Burak, a representative of the British High Commission, and was attended by multiple members of the CPD, including the Director of Corruption Prosecution (DCP). The nature of the meeting was akin to a bilateral engagement. Several questions were fielded around the Division's operations, processes, policies and possible opportunities for capacity building.

2. Additionally, during the first quarter, members of the CPD prepared and provided the Annual Report Submissions. The first draft was submitted to the DCP for review on April 30, 2024. Final submissions were subsequently prepared and provided to the office of the Executive Director on May 22, 2024. No recommendations for legislative amendments were made during the period. The settled Annual Report was then sent to the Houses of Parliament on June 26, 2024, ahead of the deadline.

Second Quarter

1. During the second quarter, the CPD provided support to stakeholder engagements organized by the Corruption Prevention, Stakeholder Engagement and Anti-corruption Strategy Division (CPSEACS). On July 19, 2024, at the request of CPSEACS, the DCP attended the National Consultation on the National Anti-Corruption Strategy (NAS), held at the Terra Nova Hotel, with relevant stakeholders and representatives.
2. On August 20, 2024, the CPD conducted sensitization training at the National Export-Import (EXIM) Bank. On August 29, 2024, the DCP delivered a presentation on “Ethics in the Courtroom” for the Association of Certified Fraud Examiners.

During the period, the CPD was also engaged for the purposes of an internal audit of the goCase Management System.

Third Quarter

1. During the third quarter, budget submissions for the Division were finalized and submitted to the Finance & Accounting Division on October 14, 2024. On October 29, 2024, the DCP attended a budget meeting convened with members of the Leadership Team and the relevant discussions were had. Concerns were raised, by the DCP, about the Commission’s posture on certification training.
2. On October 15, 2024, the DCP, along with the other Directors and representatives of the Commission, to include the Chairman and the Commissioners, attended a Meeting of the Integrity Commission Oversight Committee of Parliament. Responses were provided to questions posed by various members of the Oversight Committee. On October 24, 2024, on the invitation of the DI, the DCP participated in a Stakeholder Engagement Meeting between the Integrity Commission (IC) and Major Organised Crime & Anti-Corruption Agency (MOCA). At this meeting, discussions were had regarding collaboration and increased mutual support between both entities. On November 25-26, 2024, the Integrity Commission hosted, Mr. Robert Innocent, the Special Prosecutor of St. Lucia, at the offices of the IC, in a series of

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meetings between himself and the DCP. The purpose of Mr. Innocent's visit was to give him an opportunity to observe, up-close, the operations of the Commission, its institutional and legislative frameworks, and its effectiveness in combating corruption.

3. The Division also provided structured support to the Investigation Division by way of case reviews and analysis. Two (2) sessions were convened over the course of the financial year, which were held in this quarter. The CPD conducted a detailed assessment of the evidential material provided in the matters reviewed and feedback was given. Two (2) more sessions were scheduled but cancelled at the behest of the investigators.
4. Support was provided to the IC's Chief Audit Executive and Senior Auditor in an 'assurance engagement' as part of an efficiency review and Risk Control Assessment that undertaken across the Commission. The CPD also assisted the Senior Procurement Officer, as required, in the relevant meetings for the procurement of various items, software, security, janitorial and consultancy services for the Commission. One member of the CPD participated in the Training Session for Assessors under the Contractor and Consultant Performance Evaluation Policy (CCPEP).

Fourth Quarter

1. During the fourth quarter, the CPD continued to offer support to the CPSEACS Division. During the quarter, members of the CPD offered comments in reviewing a proposed re-vamped version of the IC Booklet.
2. On February 19, 2025, members of the CPD delivered the Anti-Corruption and Good Governance Sensitization Session (Modules 10 & 11) to employees of Independence Park Limited.
3. On March 28, 2025, members of the CPD attended the office of the Inspectorate and Professional Standards Bureau (IPROB) and delivered presentations on Good Governance and Anti-Corruption—an overview of corruption offences (Modules 10 & 11). The training aimed to educate the police officers on the DCP's authority to prosecute all acts of corruption, the process involved in referring matters to the CPD, and the collaborative initiatives that can be explored by both entities (JCF/IPROB & the CPD) when investigating and prosecuting acts of corruption.

Technological Infrastructure

The Division continued to lend support to the organization's wider Digitization Project by finalizing and updating the Standard Operating Procedures (SOPs) for a number of divisional processes. Additionally, the Division also attended and participated in numerous meetings in relation to the goCase platform, to identify any issues or recommendations necessary for its efficient use and implementation across the Commission. The UNODC

representatives attended upon the Commission and caused a revision and training exercise to be done in respect of the goCase platform.

Training

Over the period, the members of the Division were trained in various disciplines through internal and external engagements. The cost of at least one external engagement however, the Prosecutor Empowerment Programme (PEP), organized by the Office of the Director of Public Prosecutions (ODPP), was borne by the Prosecutors themselves. This particular training had to be undertaken, as it was instrumental in expanding the Prosecutors' knowledge-base in accordance with continuing legal/prosecutorial professional development. Members of the Team also underwent and delivered Designated Officers training through Management Institute for National Development (MIND).

The Division also benefitted from Data Protection training that was delivered by the IC's Data Protection Officer. Additionally, the CPD participated in training sessions in the areas of Cybercrime, Financial Investigation, Anti-corruption Indexing, certification training conducted by the International Procurement Institute of Jamaica, and others. Overall, the Division participated in approximately fifty-four (54) training sessions that were geared towards professional development and competence building.

Constraints

Staffing remained one of the most notable challenges affecting the Division during the period. At the start of the reporting period, only five (5) of the eleven (11) approved positions in the Division were filled: the Director of Corruption Prosecution (DCP), one (1) Senior Prosecutor, two (2) Prosecutors and the Legal Secretary - which accounted for forty-five (45%) percent of the intended staff complement for the Division. During the first quarter however, the Division welcomed two (2) additional Prosecutors, and in the third (3rd) quarter, the Division added another Prosecutor. These additions brought staffing to seventy-three (73) percent of the approved establishment.

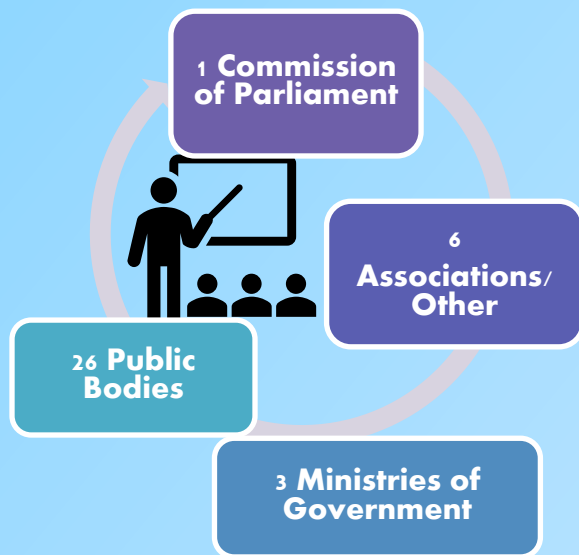
There was, however, one (1) separation at the end of the fourth (4th) quarter, that being the DCP, Mrs. Keisha Prince-Kameka, whose statutory contract period came to an end on March 31, 2025. At the close of the period, the posts of DCP, Paralegal (2 positions) and Senior Prosecutor (1 position) remains vacant - the Division is therefore operating at a staffing capacity of sixty-four percent (64%).

In light of staffing constraints, responsibilities typically associated with the vacant roles were redistributed to other staff members within the Division. Productivity and efficiency are likely to be impacted if the staffing issue persists.

Chapter 8 - Corruption Prevention, Stakeholder Engagement & Anti-Corruption Strategy Division

CORRUPTION PREVENTION, STAKEHOLDER ENGAGEMENT AND ANTI-CORRUPTION STRATEGY DIVISION- DASHBOARD

Current Reporting Period



Presentation at Conferences/Engagements/Other



Policy Papers/ Reports



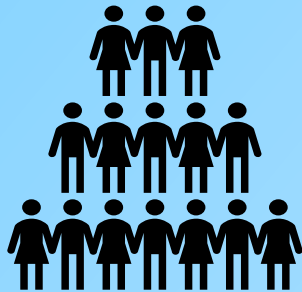
Current Reporting Period

Anti-Corruption Outreach & Education



2,360 (approximate) individuals exposed to the work of the Integrity Commission.

Human Resource



47%
(9/19 Staff Members)

Office of the Director of Corruption Prevention, Stakeholder Engagement & Anti-Corruption Strategy	Anti-Corruption Outreach and Education Unit	Anti-Corruption Policy and Strategic Engagement Unit
Director Corruption Prevention, Stakeholder Engagement & Anti-Corruption Strategy (1 Filled)	Manager Anti-Corruption Outreach and Education (1 Filled)	Manager Anti-Corruption Policy and Strategic Engagement (1 Filled)
Administrative Assistant to the Division (1 vacant)	Public Relations Officer (1 Filled)	Senior Corruption Prevention Officer (1 Filled)
	Publications and Content Management Officer (1 Vacant)	Corruption Prevention Officer (3 Vacant)
	Outreach Officer (2 filled)	Economist/ Statistician (1 Vacant)
	Ethics and Code of Conduct Officer (1 Vacant)	Anti-Corruption Research and Data Analyst (1 Filled, 1 vacant)
	Parliamentary & Public Sector Liaison (1 Filled)	
	Private Sector Liaison (1 Vacant)	
	Project Coordinator (1 Vacant)	

Introduction

For fiscal year 2024/2025 the work of the Corruption Prevention, Stakeholder Engagement and Anti-Corruption Strategy Division was targeted and revolved around executing its mandate assigned under the Integrity Commission Act, 2017. During the period under review, the Division exposed approximately two thousand three hundred and sixty (2,360) individuals to the work of the Integrity Commission by virtue of either presentations or training interventions delivered by the Division under its *Anti-Corruption and Good Governance Workshops* and/or via presentations at conferences/retreats and other events and through its various stakeholder engagement sessions.

Broken down, the engagements included delivery to three (3) Ministries of Government, twenty-six (26) Public Bodies, One (1) Commission of Parliament and six (6) Associations or Other Grouping. Additionally, the Division engaged a multiplicity of stakeholders, presented at two (2) regional and local engagements and prepared five (5) policy documents/papers/reports.

Finally, over the period, the Division successfully led the activities of the Integrity Commission in celebration of the United Nations Office on Drugs and Crime led *International Anti-Corruption Day* that was held on December 9, 2024 under the theme “*Uniting with Youth Against Corruption: Shaping Tomorrow’s Integrity*”. The activities included the production of an audio and video jingle which was disseminated across media platforms and a supplement published in the Jamaica Observer and Jamaica Gleaner newspapers on December 9, 2024

Activities Undertaken During the Reporting Period

During fiscal year 2024/2025, the work of the Corruption Prevention, Stakeholder Engagement and Anti-Corruption Strategy Division was targeted and revolved around executing its mandate assigned under the Integrity Commission Act, 2017 as per under:

Public Education and Outreach

For the period April 1, 2024 to March 31, 2025 approximately two thousand three hundred and sixty (2,360) individuals have been exposed to the work of the Integrity Commission by virtue of either presentations or training interventions delivered by the Division under its *Anti-Corruption and Good Governance Workshops* and/or via presentations at conferences/retreats and other events and through our various stakeholder engagement sessions.

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The Anti-Corruption and Good Governance Workshops cover the following topics:

Module	Topic
1.	The Problem of Corruption
2.	Overview of Jamaica's Anti-Corruption Framework
3.	Principles of Good Governance and Integrity in Public Life
4.	Public Procurement Overview
5.	Other Critical Areas Involving the Integrity Commission's Oversight
6.	Statutory Declarations
7.	Protected Disclosures Act - Whistleblowing
8.	Reporting Allegations of Corruption
9.	Investigating Allegations of Corruption
10.	Prosecuting Allegations of Corruption
11.	Overview of Corruption Offences in Jamaica
12.	International Best Practices in Anti-Corruption and Anti-Bribery

The Division delivered select modules of its Anti-Corruption and Good Governance Workshops¹¹ to select individuals of the following:

No.	Other
1.	153 rd Annual Synod Conference of the Diocese of Jamaica and the Cayman Islands – Anglican Church April 2024
2.	Commonwealth Caribbean Association of Integrity Commission and Anti-corruption Bodies June 2024
3.	National Consultation on the National Anti-corruption Strategy July 2024
4.	The Management Institute for National Development - Protected Disclosure Programme February and March 2025
5.	Sam Sharpe Teachers College March 2025
6.	Shortwood Teachers College February 2025

Ministries of Government

No.	Ministries of Government
1.	Ministry of Education, Skills, Youth and Information
2.	Ministry of Legal and Constitutional Affairs
3.	Ministry of Industry Investment and Commerce

Commissions of Parliament

No.	Commission of Parliament
1.	Integrity Commission

¹¹ It is noted that some of the Anti-Corruption and Good Governance Workshops were delivered jointly with the Information & Complaints Division, the Investigation Division and the Corruption Prosecution Division of the Integrity Commission.

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Agencies of Government

No.	Agency
1.	National Land Agency
2.	Housing Agency of Jamaica
3.	Urban Development Corporation
4.	HEART Trust NTA
5.	Department of Correctional Services
6.	Broadcasting Commission
7.	Jamaica Information Service
8.	Jamaica Customs
9.	Fair Trading Commission
10.	Kingston & St. Andrew Municipal Corporation
11.	GC Foster College
12.	Forestry Department
13.	National Irrigation Commission
14.	National Environmental and Planning Agency
15.	EXIM Bank
16.	Jamaica Social Investment Fund
17.	Development Bank of Jamaica
18.	Factories Corporation of Jamaica
19.	E-Learning Jamaica
20.	Scientific Research Council
21.	The Management Institute for National Development
22.	Spectrum Management Authority
23.	Independence Park Limited
24.	Financial Services Commission
25.	Real Estate Board
26.	Petrojam Limited

Presentations at Conferences/Retreats and Other Events

The Division delivered Country Reports and Presentations at the following events:

No.	Event
1.	153 rd Annual Synod Conference of the Diocese of Jamaica and the Cayman Islands – Anglican Church April 4, 2024
2.	10 th Annual Conference of the Commonwealth Caribbean Association of Integrity Commission and Anti-corruption Bodies 9 th – 15 th June 2024

INTEGRITY COMMISSION

Preparation of Policy Papers/Reports/Other Documents

During the period under review the Division submitted:

No.	Policy Papers/Reports
1.	Briefing Inputs on <i>Anticorruption Measures</i> to the Ministry of National Security May 2024
2.	Integrity Commission input to a request from the Ministry of Legal and Constitutional Affairs for the provision of information on Jamaica's Treaty Reporting Obligations in respect of the International Covenant on Civil & Political Rights September 2024
3.	Integrity Commission input to the Major Organized Crime & Anti-Corruption Agency in respect of Jamaica's National Risk Assessment under the Caribbean Financial Action Task Force Mutual Evaluation February 2025
4.	Integrity Commission input to the Financial Investigations Division in respect of Jamaica's National Risk Assessment under the Caribbean Financial Action Task Force Mutual Evaluation February 2025
5.	Integrity Commission input to the Attorney General's Chambers re Progress Report to the MESISIC re Jamaica's obligations under the Interamerican Convention against Corruption March 2025

Participation in Expositions/Symposium

No.	PARTICIPATION IN EXPOSITIONS/SYMPOSIUM
1.	Jamaicans for Justice – Justice for All Expo December 10, 2024
2.	Judiciary of Jamaica – Public Education Symposium February 27, 2025
3.	Court Administration Division Public Education Day November 26, 2024
4.	Department of Correctional Services Exposition November 2, 2024

International Anti-Corruption Day

The Division successfully led the activities in celebration of the United Nations Office on Drugs and Crime led *International Anti-Corruption Day* that was held on December 9, 2024 under the theme “*UNCAC at 20: Uniting the World Against Corruption*”. The activities included the production of an audio and video jingle which was disseminated across media platforms and a supplement published in the Jamaica Observer and Jamaica Gleaner newspapers on December 9, 2024.

Media Engagement

During the period under review the Division:

- As part of its public outreach and public education campaign generated public education content which was placed by the Executive Office on the Commission’s social media accounts.
- Continued update of the dedicated spot on the **website of the Integrity Commission to showcase the activities of the Division in respect of public education and outreach**. The website is regularly updated and currently reflects activities of the Division for FY 2021/2022, FY 2022/2023 FY 2023/2024 and Quarters 1, 2 and 3 of FY 2024/2025.
- Through the Commission, issued on April 30, 2024 a **media release highlighting the Work of the Division** over the period January to March 2024 representing Quarter 4 of FY 2023/2024.
- Through the Commission issued on July 9, 2024 a **media release highlighting the Work of the Division** over the period April to June 2024 representing Quarter 1 of FY 2024/2025.

Other Press Releases Issued Featuring the Corruption Prevention, Stakeholder Engagement And Anti-Corruption Strategy Division

- In respect of the intervention at the Kingston & St. Andrew Municipal Corporation it is noted that the Jamaica Observer newspaper in their June 13, 2024 online edition carried a news item on the proposed intervention titled “*KSAMC, Integrity Commission partner to host anticorruption workshop for councilors*”.
- The JIS on its website published an article titled “*Integrity Commission hosts National Anticorruption Strategy Consultation*”. This was published on July 23, 2024.

- The JIS on its website published an article titled *“Integrity Commission invites more entities to participate in Anticorruption and Good Governance training*. This was published on July 31, 2024.

National Anti-Corruption Strategy

Section 6 (1) (j) of the Integrity Commission Act, 2017 mandates the Commission to *“coordinate the implementation of an anticorruption strategy”*. During the period under review the Foreign, Commonwealth and Development Office contracted Public Administration International concluded its stakeholder consultations and in conjunction with the Commission hosted a well-attended National Consultation on the National Anticorruption Strategy on July 19, 2024.

Public Administration International thereafter submitted its report on their deliberations.

Concluding Comments

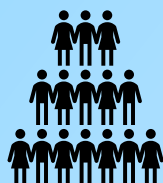
During FY2025/2026 the Division intends to onboard additional staff in an attempt at accelerating the interrogation of other areas of the Division’s mandate whilst it continues its public education outreach interventions.

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Chapter 9 - Executive Office - Information Technology and Business Processes Division

Information Technology and Business Processes Dashboard

Human Resource Capacity



85%
(13 Staff Members)

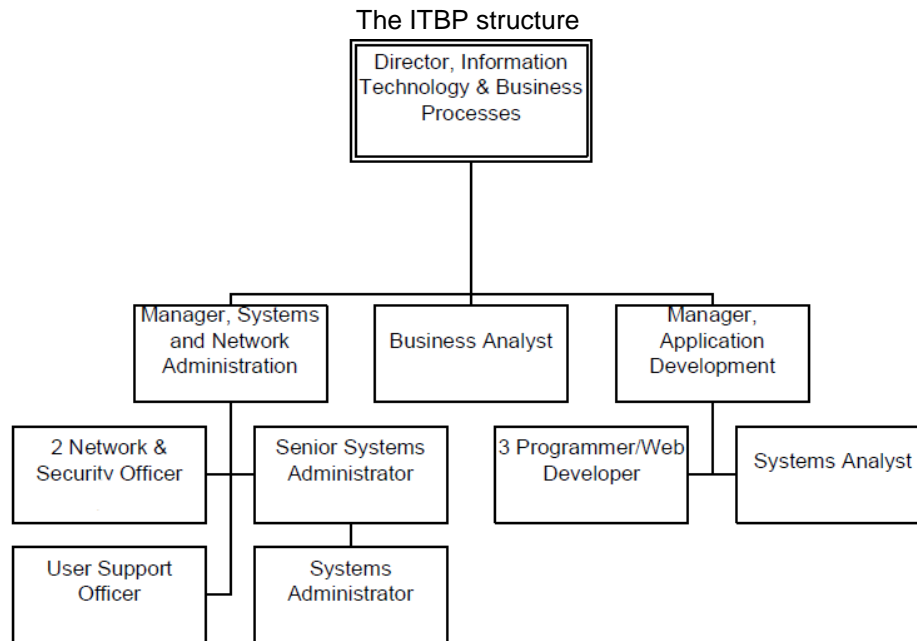
Office of the Director of Information Technology	Software Unit	Systems Unit
Director of Information Technology and Business Processes (1 filled)	Manager, Application Development (vacant)	Manager, Systems and Network (filled)
Business Analyst (1 filled)	Programmer, Web Developer (1 filled)	Network and Security Officer (2 filled)
	Systems Analyst (1 filled)	Senior Systems Administrator (filled)
	Programmer, Web Developer (2 – vacant)	Systems Administrator (filled)
		User Support Officer (filled)

Projects Completed

1	Annual Cybersecurity Awareness training
2	Contracts Costs Overruns and Variations (CCOV) System application updated
3	National Anti-corruption survey platform
4	Electronic Declaration system penetration and remediation exercise
5	Electronic Declaration systems, certification process updates
6	Electronic Declaration data analytics integration
7	Internal and external network penetrations scans and vulnerability remediation
8	Data backup and quarterly restoration exercises
9	Refreshed legacy CCTV and Access controls systems at Commission offices
10	Network security reviews and System hardening
11	Upgraded meeting rooms, IP telephones and video conferences infrastructure
12	Land and Asset Divestment and Acquisition System (LADPAS) updates
13	Prescribed Licenses Systems Updates

Information Systems and Business Processes Division

The Information Technology and Business Processes (ITBP) Division is headed by a Director who reports directly to the Executive Director and is currently supported by an eleven-member team, with a capacity for 13, as at March 31, 2025.



The ITBP Division is resolute in its mission of serving the information technology requirements of the Integrity Commission and has embraced the enterprise business process role. The ITBP Division has two main teams, Systems Networking\Security and Application\Web Development supported by the Systems Analyst, a Business Analyst and specialized staff.

The vacancies filled during the year were, Network and Security officers, the transfer of a Web Developer to the role of Systems Analyst and the separation of the Manager, Application Development. Throughout the period, repeated attempts were made to fill the role of Application\Web Developer; suitable candidates were selected but did not advance after the second-round interviews.

Support of Strategic Portfolios

For the period under review, the ITBP achieved the following strategic objectives;

- Adequately maintained Information and Communication Technologies (ICT) infrastructure which includes, license renewal, hardware and software upgrades.
- Optimised performance, reduced downtime and the proactive monitoring of the ICT environment.

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- Automated the monitoring of critical infrastructure to include uptime, downtime and capacity projection.
- Proactively monitored computer hardware and software expirations that were out of compliance.
- Improved cyber-security resilience by educating users and ensuring patches and security updates were applied as needed, network and firewalls reviews were conducted, and data and security vulnerabilities were remediated.

Project Summary

The 2024 to 2025 period focused on bolstering the ICT environment from cyber-attacks both internally and externally by conducting network penetration scans, remediating the vulnerabilities found, upgrading the ICT infrastructure and increasing the end-user cyber-security awareness training participation.

These projects and related activities had a positive impact on the organization's efficiency while embracing the emerging business processes of the Integrity Commission as it transforms to achieve its mandate.

The ITBP's projects were complemented by:

- Enhancing the Cyber-security resilience of user through education and awareness.
- Supporting, expanding and securing existing information technology (IT) infrastructure.
- Maintaining and expanding internally developed software.
- Supporting and automating existing business processes.
- Providing general user assistance.
- Providing recommendations for new technology initiatives.

Infrastructure Update and Maintenance

During the year, remedial work was conducted on the Oxford Road Offices by replacing legacy systems and upgrading to newer technologies.

During the period the ITBP team focused on:

- Remediating vulnerabilities identified within existing Software and Hardware.
- Securing the email and data storage systems.
- Securing the Commission's Internet edge devices, and internal network devices.
- Working with the Information and Complaints Division to enhance its data analytics processes for the Declaration system.
- Reviewing existing processes and procedures within the Divisions.

Information Security

Activities during the period were related to resolving the vulnerabilities identified during the internal and external network penetration and vulnerability scans. These activities saw the formation of a dedicated team from within the ITBP to work on resolving these vulnerabilities. A vulnerability manager software was deployed to enhance the patching and updating processes. This resulted in much overall improvement, especially with patch compliance.

A number of IT policies and internal procedures were reviewed during the period to align them to the ISO 27001:2022 and ISO 27002:2022 standards and changes to internal processes. Cybersecurity awareness training continued with new and existing staff participating, resulting in a positive increase in the number of IC staff who are able to potentially identify malicious cyber-attacks and take preventive measures.

Business Continuity Strategy

During the period, the Commission's data backup infrastructure, offsite storage, daily and weekly backup, were successfully completed. To ensure that a critical part of the recovery strategy was tested, the data stored on data tapes were successfully restored on a periodic basis throughout the period.

The deployment of a monitoring software has also played a key role in managing computing resources. This has allowed for proactive measures to be taken based on trends, resource utilization, and uptime, thereby achieving a 99% uptime.

The Integrity Commission and Contracts Websites.

The Integrity Commission utilises and maintains the following four websites:

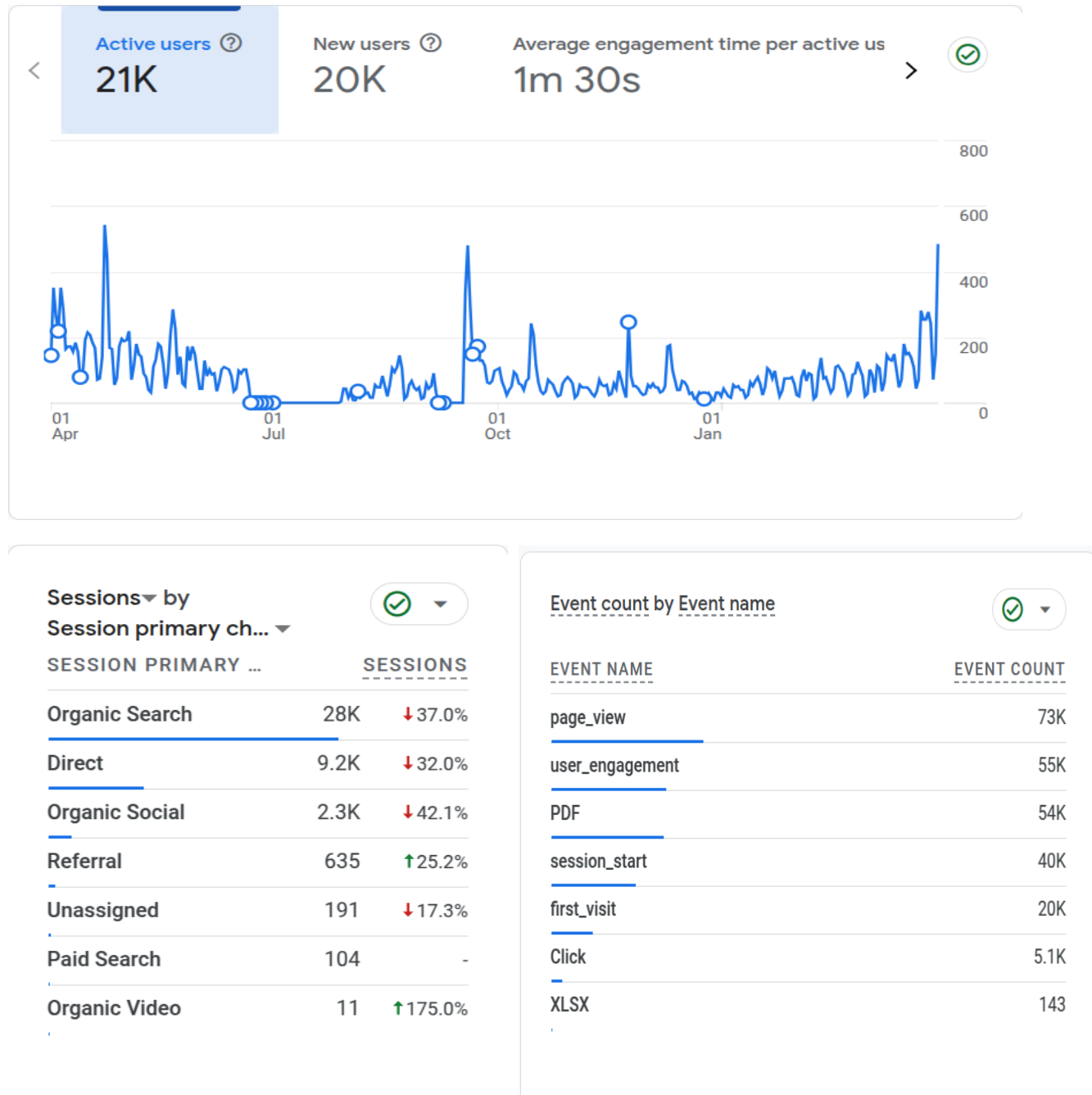
- The Integrity Commission's website – www.integrity.gov.jm
- Quarterly Contract Awards Portal – qca.integrity.gov.jm
- Contract Cost Overrun and Variation Portal – ccov.integrity.gov.jm
- Electronic Declaration System.

The Integrity Commission's website provides pertinent information on matters which relate to its work. The Integrity Commission's website was refreshed to ensure a better secured hosting platform, ease of use and navigation by viewers.

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The primary purpose of the website is to provide a medium that promotes standards of ethical conduct among parliamentarians, public officials and other persons, while promoting transparency in the Government of Jamaica's (GOJ's) Procurement and Contract Award Processes. The website also seeks to ensure that useful and timely information, which relates to the activities and work of the Integrity Commission, is easily accessible to all stakeholders.

The Integrity Commission website statistics



Views by Page title and screen class



PAGE TITLE AND SCREEN CLASS

VIEWS

Home Integrity Commission	17K
Statutory Declaration Form Integrity...	10K
Employment Opportunities Integrity...	8.1K
Investigation Reports Integrity Co...	5.8K
Statutory Declaration Sample Integ...	2.6K
Contact Us Integrity Commission	2.2K
Investigation Reports - Rulings Inte...	1.6K

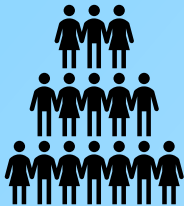
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Chapter 10 - Executive Office - Corporate Services Division

HUMAN RESOURCE CAPACITY DASHBOARD

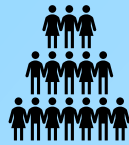
Executive Direction & Administration Programme

CENTRAL ADMINISTRATION SUB-PROGRAMME



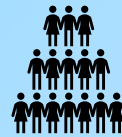
30%
[54 Staff Members]

Executive



6%
[10 Staff Members]

Corporate Services



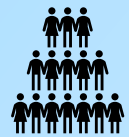
16%
[28 Staff Members]

Information Technology & Business Processes



6%
[10 Staff Members]

Finance & Accounts

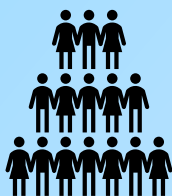


3%
[6 Staff Members]

Promotion of Integrity in the Public Service Programme

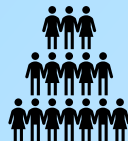
ANTI-CORRUPTION SERVICES

SUB-PROGRAMME



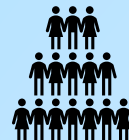
47%
[83 Staff Members]

Information & Complaints



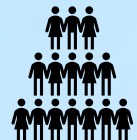
16%
[28 Staff Members]

Investigation



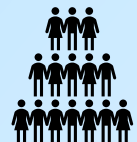
22%
[39 Staff Members]

Corruption Prosecution



4%
[8 Staff Members]

Corruption Prevention



5%
[9 Staff Members]

Structure and Composition of the Integrity Commission

The structure of the Commission comprises two main programmes:

1. **Executive Direction & Administration:** This programme, comprising four Divisions, accounts for 35% of the approved structure. It seeks to provide institutional governance and operational capacity for the Commission, and is concerned with policy formulation, initiation, review and evaluation and provides centralized services such as personnel management, financial management, information technology, and other administrative services necessary to support the Central Administration operations.

At the end of March 31, 2025, the staffing level for this programme was 54 employees, representing 30% of the employees as shown below:

EXECUTIVE DIRECTION & ADMINISTRATION	Division	Approved Capacity	Current Complement	% of Capacity
Direction & Management	Executive	12	7	4%
Administration of Internal Audit		3	3	2%
Financial Management & Accounting Services	Finance & Accounts	7	6	3%
Human Resources & Other Support Services	Corporate Services	28	28	16%
	Information Technology & Business Processes	13	10	6%
CENTRAL ADMINISTRATION		63	54	
% of Capacity / Current Complement		36%	30%	

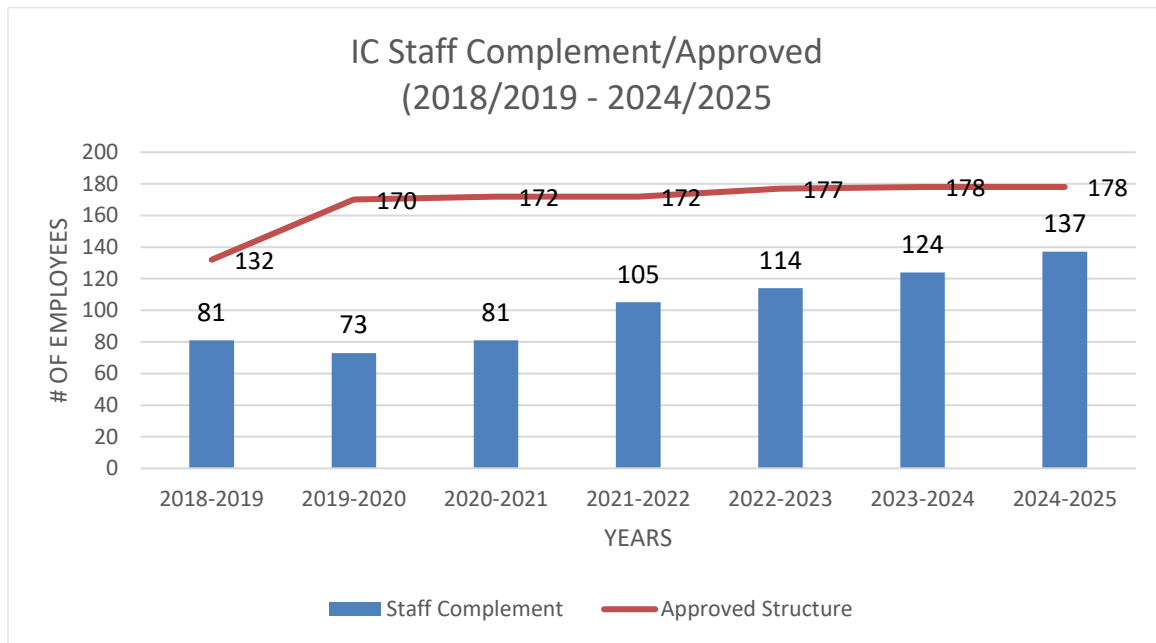
2. **Promotion of Integrity in the Public Service:** This programme, comprising four Divisions, represents 65% of the approved structure, and supports the core functions of the Integrity Commission Act, 2017. The core functions include, anti-corruption engagement programmes, the processing of complaints, contracts monitoring & investigation, and enforcement services.

At the end of March 31, 2025, the staffing level for this programme was 74 employees, representing 42% of the employees.

PROMOTION OF INTEGRITY IN THE PUBLIC SERVICE	Division	Approved Capacity	Current Complement	%
Information & Complaints Processing	Information & Complaints	28	28	16%
Investigations for Corruption Detection	Investigations	57	39	22%
Corruption Prosecution	Corruption Prosecution	11	7	4%
Corruption Prevention	Corruption Prevention	19	9	5%
ANTI-CORRUPTION INITIATIVES/SERVICES		115	83	
% of Capacity / Current Complement		65%	47%	

Overview of Staffing Capacity of the Integrity Commission

Since the official formation of the Integrity Commission on February 22, 2018, approved amendments to the organizational structure were granted, to ensure that the structure has the requisite capacity to undertake the objectives and functions of the Act. Accordingly, the structure since being commissioned, increased from 132 employees to 178 employees, representing an increase of 34%, whilst the staffing complement grew steadily over the years. At the end of the financial year March 31, 2025, 137 Fixed-Term Contract (FTC) employees were employed, as depicted in the chart below.



The workforce capacity of the Commission at the end of the fiscal period represented an overall staffing level of 150 employees comprising 137 FTC employees, and 13 temporary employees.

The 137 FTC employees represent a 11% increase over the previous year's staffing level of 123 employees.

INTEGRITY COMMISSION

Corporate Services Division

The Corporate Services Division (CSD) comprises four departments:

1. Human Resource Management
2. Office Services
3. Public Procurement
4. Registry

At the end of the reporting period the Division had a staffing level of 28 persons across the two locations of the Commission. Private security personnel who also fall under the Division, are not counted as staff.

Human Resource Management Department

During the reporting period, the CSD through the Human Resource Management Department (HRMD) gave priority to general staffing activities, to include recruitment, performance assessments, staff welfare, and training & development programmes for the organization.

Staffing Complement of the Integrity Commission

The Commission commenced the 2024-2025 fiscal year with a staffing level of 137 employees comprising 123 Fixed-Term Contract (FTC) employees, and 14 Temporary employees.

The Commission ended the fiscal year, March 31, 2025, with a staffing level of 150 employees comprising 137 FTC employees and 13 temporary employees.

TOTAL HEAD COUNT 2024-2025

MONTHS-ENDING	FTC EMPLOYEES	TEMP EMPLOYEES	TOTAL HEAD COUNT
Apr-24	123	14	137
May-24	130	14	144
Jun-24	134	14	148
Jul-24	137	14	151
Aug-24	138	14	152
Sep-24	140	14	154
Oct-24	143	12	155
Nov-24	142	14	156
Dec-24	139	14	153
Jan-25	138	14	152
Feb-25	138	14	152
Mar-25	137	13	150
AVERAGE HEAD COUNT	137	14	150

INTEGRITY COMMISSION

Operationalization of the Approved Structure

At the end of the Financial Year, ending March 31, 2025, the Commission's structure of 178 posts was at 77% of capacity with 137 employees onboarded as depicted below:

APPROVED STRUCTURE		178	178		
INTEGRITY COMMISSION	CAPACITY ON STRUCTURE	PREVIOUS YEAR (2023) STAFFING	CURRENT YEAR 2024-2025 STAFFING	CURRENT % ON STRUCTURE	CURRENT CAPACITY
Executive Office	15	8	10	6%	67%
Corporate Services	28	24	28	16%	100%
Finance & Accounts	7	7	6	3%	86%
Information Technology	13	10	10	6%	77%
Corruption Prevention	19	9	9	5%	47%
Information & Complaints	28	23	28	16%	100%
Investigation	57	37	39	22%	68%
Corruption Prosecution	11	5	7	4%	64%
TOTAL ONBOARDED	178	123	137	77%	
% ON STRUCTURE		69%	77%		

Staffing – Recruitment & Selection (FTC Employees)

The Commission, for the 2024/2025 period, budgeted and targeted the recruitment and selection of 31 FTC vacant posts.

As at March 31, 2025, of 57 vacant posts advertised, the Commission successfully recruited and filled 31 FTC vacant positions, and 5 temporary positions as depicted in the Recruitment and Selection table below. 3 of the FTC recruited, were competitively filled from the temporary employee pool.

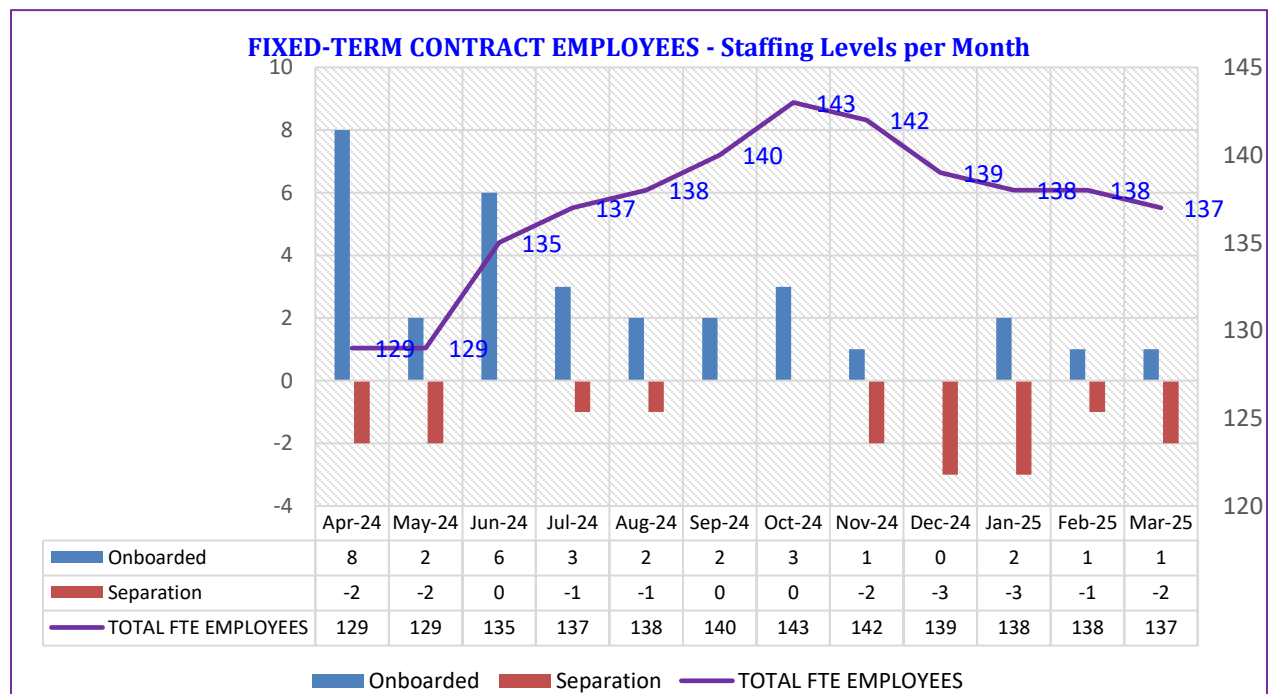
INTEGRITY COMMISSION

Staffing Complement – Recruitment & Selection Table

MONTHS	VACANT POSTS ADVERTISED	INTERVIEWS CONDUCTED	NEW FTC POSTS ONBOARDED	POSTS FILLED INTERNALLY	TEMPORARY POSTS ONBOARDED
24-Apr	-	8	8	-	-
24-May	13	7	2	-	-
24-Jun	0	4	6	-	2
24-Jul	7	7	3	1	-
24-Aug	8	9	2	-	-
24-Sep	3	7	2	-	-
24-Oct	3	12	3	1	-
24-Nov	5	5	1	-	2
24-Dec	-	2	-	-	-
25-Jan	5	4	2	-	-
25-Feb	3	6	1	1	1
25-Mar	10	7	1	-	-
TOTAL	57	78	31	3	5

Staffing – Recruitment & Separation (FTC Employees)

During the reporting period, the Commission successfully recruited 31 FTC employees, whilst there were 17 FTC separations from the organisation, as summarized below:



INTEGRITY COMMISSION

Staffing – Separation Breakdown (FTC + Temporary Employees)

The Commission recorded an overall separation of twenty (20) officers from the organisation during the 2024/2025 reporting period as outlined below:

i. Voluntary Separation (16 employees):

- a. From Resignation:
 - i. Twelve FTC (12) Officers.
 - ii. Two (2) Temporary Officers
- b. Did not renew Contract: Two (2) FTC Officers

ii. Involuntary Separation (4 Officers)

- a. Contracts not renewed at end of contract period: Two (2) FTC Officers.
- b. Probationary Termination:
 - i. One (1) FTC Officer
 - ii. One (1) Temporary Officer

Turnover Rate (FTC Employees)

The employee turnover rate is influenced by two main factors: voluntary separation initiated by the employee and involuntary separation, initiated by the Commission.

The Turnover Rate of FTC employees for the 2024-2025 reporting period was 12%, which reflects a reduction of 3% when compared with the previous period as depicted in the table below.

The influencing factors that impacted the turnover rate of FTC employees include: the expiration of three-year employment contracts; non-renewal of contracts; and last but not least resignations.

FINANCIAL YEAR	HEAD COUNT	NEW POSTS ONBOARDED	SEPARATION	TURNOVER RATE	
2018-2019	81	8	9	11%	Transition Period
2019-2020	73	2	8	11%	
2020-2021	81	22	13	16%	
2021-2022	105	34	11	10%	
2022-2023	120	21	11	9%	
2023-2024	123	33	18	15%	
2024-2025	137	31	17	12%	

Based on exit interviews conducted, the main reasons cited for the resignations have been generally attributed to unresolved issues with the new MOFPS compensation system, equal opportunities in other Public Bodies with better compensation package that doesn't have the high-risk working environment of the Commission.

The rate of separation continues to be a cause of concern within the Commission, as the cost of finding new employees, plus the training costs and time to equip and deploy them to the productive workforce is negatively impacting the effectiveness and efficiency of the organization.

The Commission's exit interview process revealed that the two main reasons for separations were:

- a. Low compensation, based on unresolved issues with the new compensation system.
- b. High-risk working environment with elevated stress levels of which employees chose to leave to take up comparative posts in other Public Sector Bodies that offer better compensation and less levels of external stress.

The anti-corruption services programme was significantly impacted during the 2024-2025 period, recording 89% of the total separation from the organization.

Unresolved Issues - New Compensation System

The Ministry of Finance and the Public Service (MOFPS), despite facilitating meetings in the initial stages with the Commission after receiving its Compensation Package, is yet to resolve concerns raised.

Since the implementation of the new compensation system, the Commission has been experiencing several challenges which have negatively impacted its Recruitment Plan, and increased separation from the organization due to matters relating to inadequacies of the compensation package that the organization received. These setbacks were:

- i. Inability to effectively fill vacant positions due to uncompetitive and unattractive compensation packages/rates.
- ii. Frequent loss of trained and experienced staff which impacted productivity, and timely completion of tasks.
- iii. High cost of recruitment and re-training of staff to effectively continue operations.

The Commission, in discussion with the MOFPS sought due consideration for a favourable review of the compensation package received, in keeping with the anti-corruption status of the organization, and the

INTEGRITY COMMISSION

high-risk working environment with chronic operational hazards in which it operates causing excessive mental, emotional and elevated stress levels of its employees.

Implementation of MyHR+ System

The Commission, in collaboration with the Transformation Implementation Unit (TIU) of the MOFPS, successfully completed the first two phases of the MyHR+ software system in the 2023-2024 period, completed two additional phases in the 2024-2025 period.

During the reporting period, the self-help leave requests and leave management feature of the system were implemented. The records management feature of the system also commenced during the year.

The final implementation phases of the MyHR+ System is expected to be completed during the 2025-2026 period.

Staff Training & Development

During the 2024-2025 period, the organization continued its Training & Development Programme to build the capacity and competency of its employees. At the end of the reporting period, 355 participants completed 68 training programmes with an overall cost of approximately \$17.7M.

Several employees across all Divisions were part of multiple training programmes during the period.

2024-2025	# of Training Programmes Completed	Participants	Cost
1st QTR (Apr-Jun 2024)	8	49	\$2.3M
2nd QTR (Jul-Sep 2024)	7	225	\$7.1M
3rd QTR (Oct-Dec 2024)	9	26	\$5.6M
4th QTR (Jan-Mar 2025)	13	55	\$2.7M
TOTAL	37	355	\$17.7M

The Key Training Programmes embarked on during the reported period are summarized below:

- Cyber-Security Training (All Divisions)
- Data Protection Training (All Divisions)
- Procurement Training (INPRI) Levels 1 to 4
- Principles and Practice of Project Management

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Performance Management

During the reporting period, the Human Resource Department, continued its efforts towards improving the performance assessment process.

The Human Resource Department, in collaboration with Divisional Heads, processed and completed a total of 106 performance appraisals during the reporting period, as depicted below.

2024-2025	# of Performance Appraisals Completed
1st QTR (Apr-Jun 2024)	15
2nd QTR (Jul-Sep 2024)	36
3rd QTR (Oct-Dec 2024)	33
4th QTR (Jan-Mar 2025)	22
TOTAL	106

Staff Welfare, Awards & Recognition Programmes

The Commission, planned, and successfully facilitated staff welfare and awards programmes during the year through its Social Activities Club. The Commission also hosted a Staff Recognition and Awards Ceremony, which formed part of the Commission's Christmas Luncheon/Year-end celebrations.

The Above and Beyond Award was established to help to inspire and motivate Integrity Commission employees to reach their maximum potential.

Thirteen 13 awardees were selected, recognised, and awarded for going above and beyond in the undertaking of their daily activities, and their outstanding work effort, exceptional contribution towards efficiency and effectiveness of the Commission's operations, and special efforts to promote workforce excellence.

Procurement Department

During the year, the Procurement Department generated 468 Purchase Orders on the GOJ GFMS system with expenditures totaling approximately \$383.3M, generated over the 4 Quarters, as summarized in the procurement table.

2024-2025	Purchase Orders	Cost
1st QTR (Apr-Jun 2024)	91	\$20.3M
2nd QTR (Jul-Sep 2024)	111	\$90M
3rd QTR (Oct-Dec 2024)	115	\$110M
4th QTR (Jan-Mar 2025)	151	\$163M
TOTAL	468	\$383.3M

Quarterly Contract Award (QCA) Reports - 2024/2025

- All 4 QCA Reports for the fiscal year ending March 31, 2025, were prepared and uploaded on the portal within the specified timeframe per Quarter.

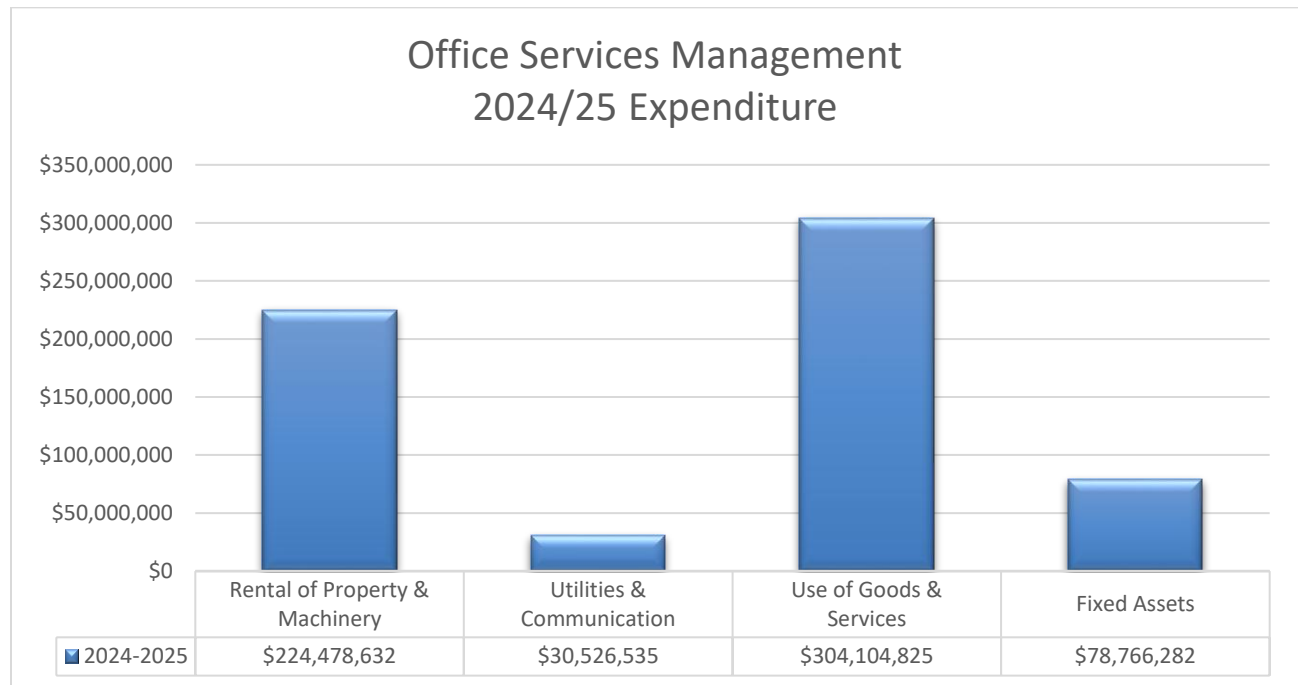
Procurement Committee Meetings

- The Procurement Committee of the Commission held nine (9) meetings during the reporting period for procurement activities submitted for endorsement.

Office Services Department

The Office Services Department has direct responsibility for the management of Utilities and Communication Services; Rental of Property & Machinery; Receival and Management of all Assets; as well as Property Management and Maintenance Services at both locations.

The Department facilitated requests from all Divisions during the period for the procurement of related goods and services and fixed assets, and other goods and services during the 2024/25 Financial Year. These are summarized in the 2024/25 Expenditure Chart for Office Services.



Lease/Rental of Office Space

1. Leased from Planning Institute of Jamaica (PIOJ), located at 16 Oxford Road, Kingston 5 (1st Floor). The lease term is for five years commencing on the January 1, 2023 and expires December 31, 2028 with an option to renew a further five years.
2. Leased from Sagicor Life Jamaica Limited, located at 63-67 Knutsford Boulevard, Kingston 5 (Sagicor Sigma Building 3rd to 6th floors). The lease term is for ten years commencing September 1, 2021 and expires August 31, 2031. There is an option to renew the lease for two further consecutive terms of five years.

Lease/Rental of Car Park Parking Facilities

1. Seven parking spaces, included within the lease of property from Planning Institute of Jamaica (PIOJ), located at 16 Oxford Road, Kingston 5 (1st Floor). The lease term is for five years commencing on the January 1, 2023 and expires December 31, 2028 with an option to renew a further five years.
2. Thirty-six parking spaces leased from National Water Commission, located at 18 Oxford Road, Kingston 5. The lease term is for three years commencing on the May 16, 2022 and expires May 15, 2025, with an option to extend.
3. Seventy parking spaces leased from Sagicor Life Jamaica Limited, located at 63-67 Knutsford Boulevard, Kingston 5 (Sagicor Sigma Building 3rd to 6th floors). The lease term is for ten years commencing September 1, 2021 and expires August 31, 2032.

Occupational Health & Safety

1. **Occupational Injury:** There was one (1) reported occupational safety incident that occurred during the reporting period, resulting in an occupational injury, requiring medical treatment beyond first-aid. The affected employee was out of office for three (3) weeks.

The incident was investigated and reported to our Insurance Brokers. An injury claim was processed and completed.

2. **Air Quality Remediation:** Arising from an Indoor Air Quality Assessment report received on March 7, 2024, the Commission's Offices located at 16a Oxford Road on the 1st Floor of the PIOJ Building was diagnosed with air quality issues.

The main findings of the air quality assessment were significantly elevated levels of yeast, mold and relative humidity; variation in temperature and non-functional return air systems; moisture intrusion; and elevated levels of respiratory particulate matters.

Based on the recommendations provided, the Commission:

- a) Held a staff meeting and relocated all occupants on March 18, 2024, from the high-risk office location at Oxford Road to its Knutsford Boulevard office location;

- b) Engaged a mechanical engineer with professional experience in ventilation systems to correct issues and to ensure they are fit for purpose;
- c) Engaged the services of a consultant to Identify the reasons for the high relative humidity and implement the necessary correction actions and to conduct mold and yeast remediation.
- d) Engaged the services of service providers to remove and replace the aged and defective carpeting, that was also identified as a major source of the mold and yeast.
- e) The remediation project suffered some minor setbacks when the island was impacted by an earthquake causing structural damages to the building. The Commission engaged the landlord, PIOJ, to address structural defects caused by the earthquake.

All corrective actions with the exception of the PIOJ's structural repairs were completed. An intermediate solution was implemented to temporarily address the structural defects.

Following a retesting of the office area for mold and yeast, favourable conditions were reported which allowed staff to be relocated to the Oxford Road offices by the end of the 3rd QTR 2024-2025 period.

3. **Hurricane Impact:** Hurricane Beryl, the first 2024 Atlantic Hurricane Season's named storm, and the earliest storm on record to reach the strongest possible ranking of Category 5 in Jamaica, made landfall on July 3, 2024. Hurricane Beryl caused significant damages across the island, especially in the southern coastal areas, with reports of damage to telecommunications and infrastructure, housing, public buildings and healthcare facilities.

The hurricane also impacted the Commission's office areas on the Sagicor Sigma Building affecting all 4 floors of the Commission.

4. **Earthquake Impact:** The operation of the Commission, at both office locations, was impacted by a 5.3 magnitude earthquake on August 16, 2024, that was felt across the island.

Immediately following the earthquake, staff members on the building quickly proceeded to the designated Assembly Point where a roll call was conducted to account for all staff members who had reported to work before and during the earthquake.

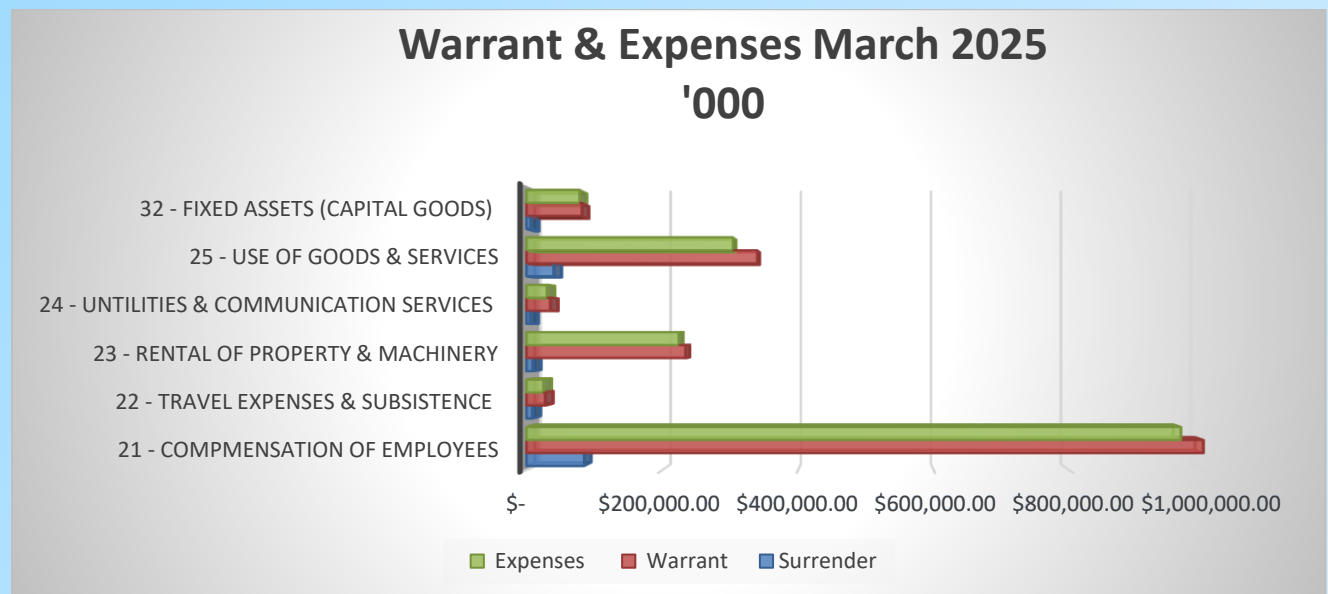
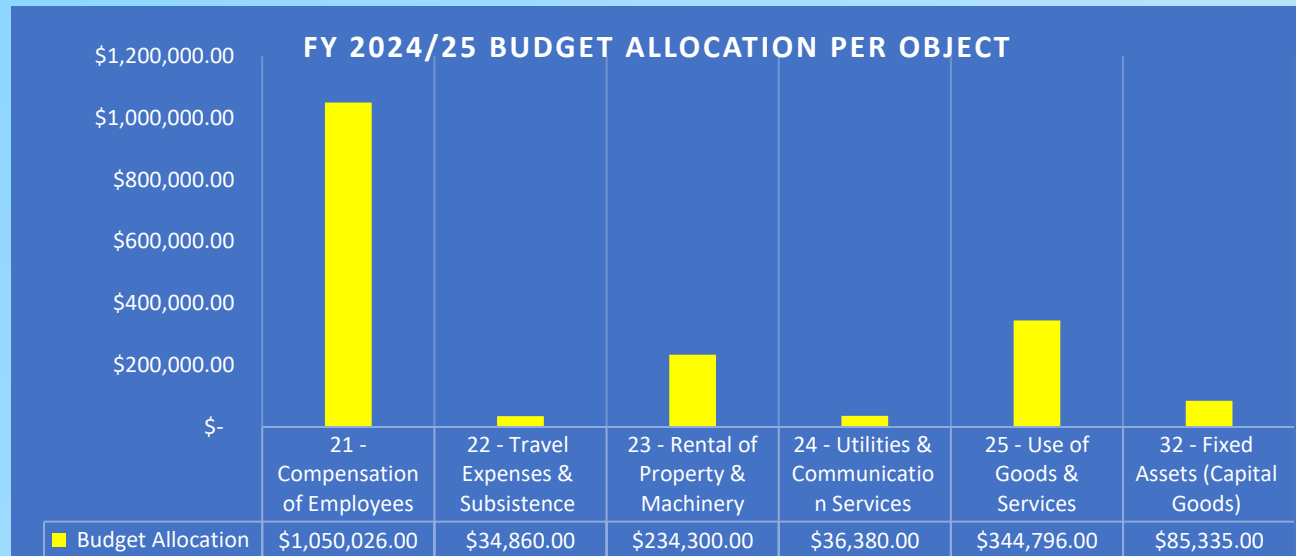
Security and safety checks were then conducted by Safety Officers who checked the building and floors for structural damages. Several staff members were traumatized from the earthquake.

Following the security and safety checks, clearance to re-enter the offices was granted.

Chapter 11 - Executive Office- Finance and Accounts Division

Finance & Accounts Division Dashboard

Current Reporting Period



Finance & Accounts Division Dashboard

Human Resource Capacity

Human Resource



86%

{6 Staff Members}

Finance and Accounts Division

Director of Finance & Accounts (1Vacant)

Chief Accountant (1 Filled)

Management Accountant (1 Filled)

Financial Accountant (1 Filled)

Senior Accounting Officer (1 Filled)

Senior Payroll Officer (1 Filled)

Payroll Officer (1 Filled)

Estimates of Expenditure for the Period April 2024 to March 2025

The Accounting Period April 2024 – March 2025

The Commission's Estimates of Expenditure proposal for the Financial Year 2024/2025 was submitted to the Ministry of Finance and the Public Service in November 2023.

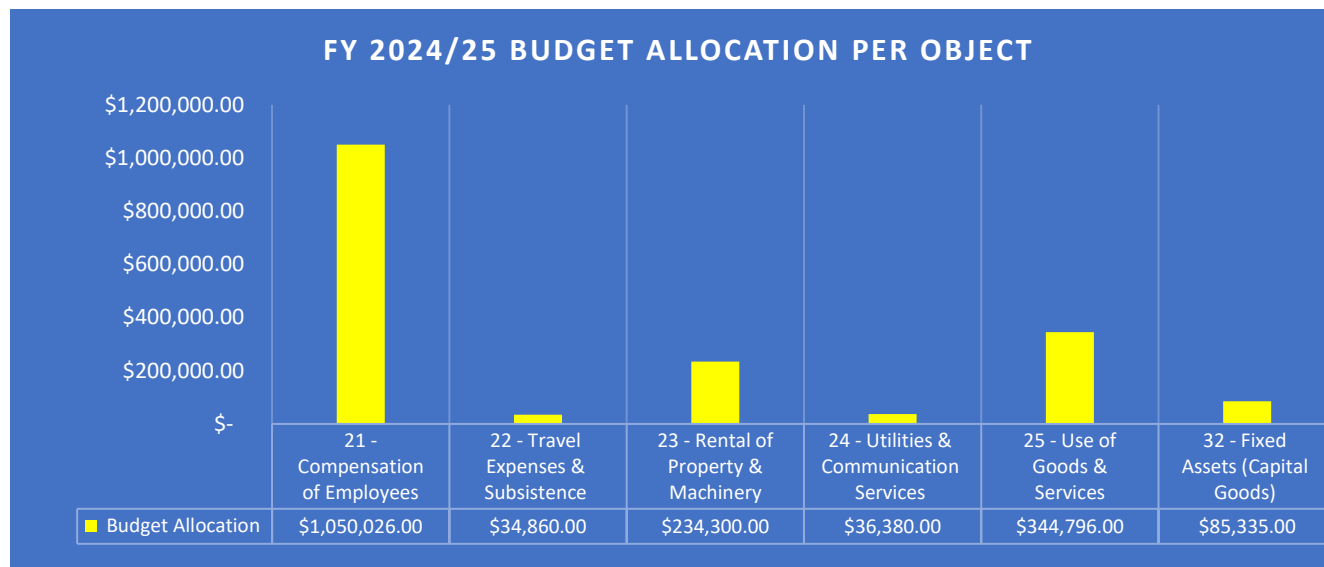
The approved budget, inclusive of Supplementary Estimates, amounted to One Billion, Eight Hundred and Twenty-Seven Million, Two Hundred and Ninety-Seven Thousand Dollars (\$1,827,297,000). This allocation included Forty-One Million, Six Hundred Thousand Dollars (\$41,600,000) designated for Statutory Expenditure.

Breakdown of Approved Budget for 2024-2025

• Recurrent Expenditure	-	\$1,720,390,000
• Statutory Expenditure	-	\$ 41,600,000
• Donor Fund	-	<u>\$ 65,307,000</u>
		<u>\$1,827,297,000</u>

Approved Budget Allocation - Period April 2024 – March 2025

The approved budget was allocated to six (6) Budget Objects as depicted in the chart, comprising: Compensation of Employees (59%); Travel & Expenses (2%); Rental of Property (13%); Utilities & Communication (2%); Use of Goods & Services (19%) and the Acquisition of Fixed Assets (5%).



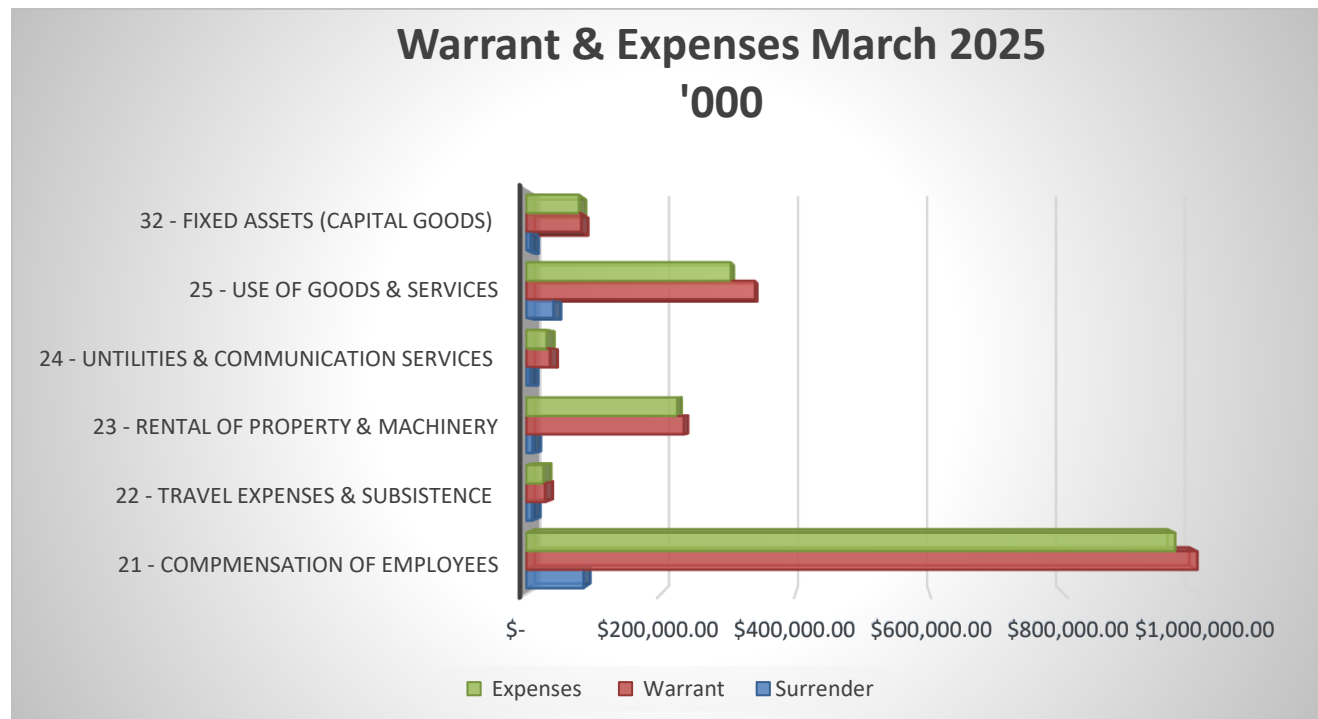
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Additionally, the United Kingdom Foreign, Commonwealth & Development Office (FCDO) committed Twenty-Nine Million, Four Hundred and Eighty-One Thousand Dollars (\$29,481,000) in donor funding for the financial year. When combined with the balance carried forward from the previous financial year, the total funds available from the FCDO amounted to Sixty-Five Million, Three Hundred and Seven Thousand Dollars (\$65,307,000).

Warrant Allocation as at March 2025.

As of March 31, 2025, the Warrant Allocation for Recurrent Expenditure as shown in the chart amounted to One Billion, Seven Hundred and Seventeen Million, Five Hundred and Nine Thousand Dollars (\$1,717,509,000), while Statutory Expenditure was Forty-One Million, Six Hundred Thousand Dollars (\$41,600,000).

By the end of the fiscal period ending March 2025, a total of One Billion, Seven Hundred and Fifty-Nine Million, One Hundred and Nine Thousand Dollars (\$1,759,109,000) was authorized through warrants to the Commission. This amount covered Recurrent and Statutory Expenditure, as well as funding from the Foreign, Commonwealth & Development Office (FCDO).



BUDGET PERFORMANCE – BY Programme/Sub-Programme/Activity

Programme #001: Executive Direction & Administration

This Programme provides institutional governance and operational capacity to support personnel management, financial & accounting management, administration, procurement, and information technology services to support the Commission's operation utilised 93% of the Approved Vote and 97% of the Warrant Allocated.

Sub-Programme: Central Administration

ACTIVITY		Approved Budget/Vote	Warrant YTD	Expenditure YTD	% of Warrant Utilized	% of Vote Utilized
		(J\$)	(J\$)	(J\$)		
10001	Direction & Management (including Statutory Provisions)	55,148,000	54,180,000	53,151,020	98%	98%
10002	Financial Management & Accounting Services	53,514,000	50,576,000	49,836,818	95%	99%
10003	Human Resources & Other Support Services	896,614,000	887,513,250	822,979,495	99%	93%
10279	Administration of Internal Audit	13,743,000	12,650,000	11,538,648	92%	91%
CENTRAL ADMINISTRATION		1,019,019,000	1,004,919,250	937,505,981	97%	93%

Programme #728: Promotion of Integrity in the Public Service

This programme supports the core functions of the Commission, of which the Strategic Business Units undertake engagement programmes, processing of complaints, contracts monitoring & investigation, and enforcement services utilised 95% of the Approved Vote and 96% of the Warrant Allocated.

Sub-Programme: Anti-Corruption Services

ACTIVITY		Approved Budget/Vote	Warrant YTD	Expenditure YTD	% of Warrant Utilized	% of Vote Utilized
11860	Information & Complaints Processing	230,931,000	229,758,750	225,415,170	99%	98%
11861	Investigations for Corruption Detection	359,111,000	325,311,000	313,131,455	91%	87%
11870	Corruption Prosecution	64,760,000	64,760,000	62,885,036	100%	97%
11871	Corruption Prevention	111,876,000	92,760,000	89,172,768	83%	96%
	Anti-Corruption Initiatives/Services	766,678,000	712,589,750	690,604,429	93%	97%
	09000-Integrity Commission	Approved Budget/Vote	Warrant YTD	Expenditure YTD	%Warrant Utilized	% of Vote Utilized
	TOTAL	1,785,697,000	1,717,509,000	1,628,110,411	96%	95%

Actual Expenditure

As of the end of the fiscal period ending March 2025, total expenditure amounted to One Billion, Six Hundred and Sixty-Nine Million, Three Hundred and Sixty Thousand, Two Hundred and Twenty-Five Dollars (\$1,669,360,225). This included Sixty-Three Million Dollars (\$63,000,000) in funding from the FCDO.

The foregoing financial data are based on and aligned with the Commission's Consolidated Fund Accounting, as required for entities funded through the Consolidated Fund.

The Audited Financial Reports of the Commission, appended to this report, have been prepared in accordance with International Financial Reporting Standards (IFRS), as mandated by the Integrity Commission Act. A key distinction between the two accounting frameworks is that IFRS requires the accrual of income and expenditure, whereas Consolidated Fund Accounting primarily records transactions on a cash basis. Additionally, IFRS prescribes specific guidelines for the recognition, measurement, and reporting of assets, which differ from those applied under the Consolidated Fund Accounting framework.

Memorandum of Understanding with the Foreign, Commonwealth and Development Office (FCDO)

On July 7, 2020, the Commission submitted a proposal titled "Integrity Commission DFID Support: Needs Assessment & Plan" to the then Department for International Development (DFID), seeking funding support for key projects and resources essential to its effective operation. Subsequently, DFID merged with the Foreign & Commonwealth Office (FCO) to form the FCDO, effective September 2, 2020. Following this transition, the Government of Jamaica entered into a Memorandum of Understanding (MOU) with the FCDO in October 2020 to facilitate capacity-building support for the Integrity Commission under the Serious Organized Crime and Anti-Corruption Programme (SOCAP). The initial MOU covered the period from October 26, 2020, to March 31, 2025. However, this agreement was subsequently extended to March 31, 2026.

FCDO Funding 2024-2025

A total of One Hundred and Fifty Thousand Pounds (£150,000) was committed to supporting efforts to combat corruption in society.

At the beginning of the financial year, the fund had an opening balance of One Hundred and Eighty-Four Thousand, Four Hundred and Ninety-Nine Pounds and Twenty-Five Pence (£184,499.25). With the addition

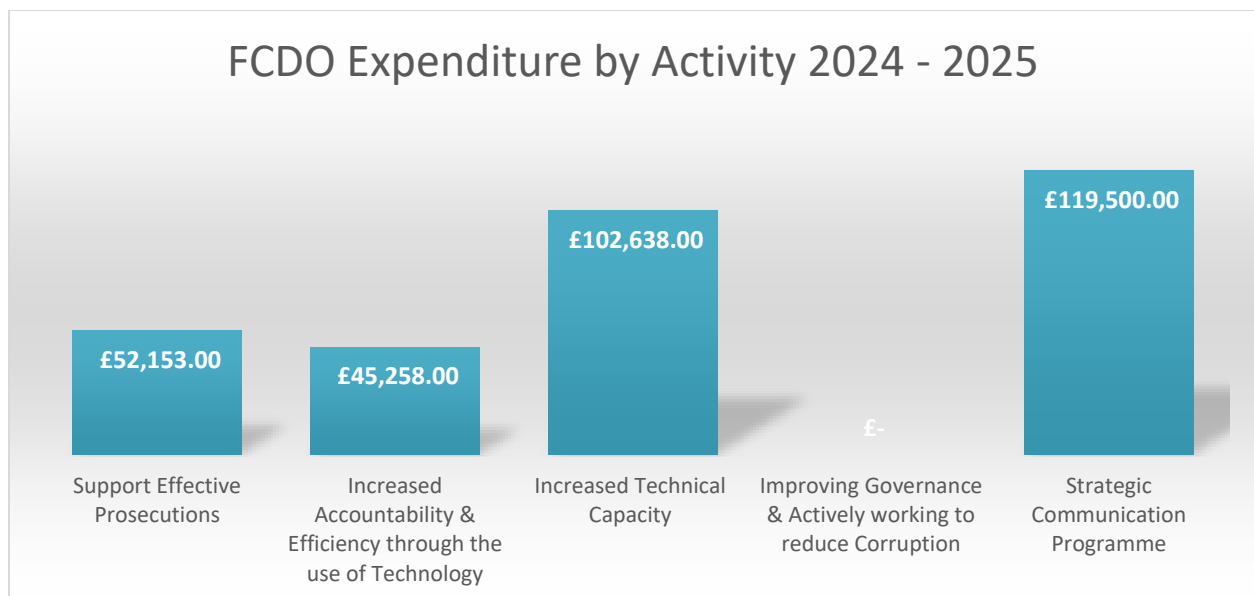
INTEGRITY COMMISSION

of One Hundred and Fifty Thousand Pounds (£150,000) received during the year, the total available funds amounted to Three Hundred and Thirty-Four Thousand, Four Hundred and Ninety-Nine Pounds and Twenty-Five Pence (£334,499.25).

From this amount, Three Hundred and Nineteen Thousand, Five Hundred and Fifty Pounds and Eighteen Pence (£319,550.18) was expended to provide essential resources as shown in the chart. These included:

- Training in the GoCASE Case Management System
- Software licenses and subscriptions
- Acquisition of a motor vehicle, equipment, and furniture
- Training and capacity-building initiatives

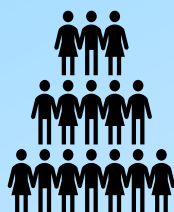
This funding played a crucial role in strengthening the Commission's operational capabilities and enhancing its efforts in the fight against corruption.



Chapter 12 - Executive Office -Legal Department

Legal Department Dashboard

Human Resources Capacity



50%
(1 of 2 staff members)

**Legal
Counsel**
(vacant)

**Legal
Officer**
(filled)

COURT PROCEEDINGS- REPORTING YEAR APRIL 1, 2024 TO MARCH 31, 2025

During the reporting year, April 1, 2024 to March 31, 2025, the Commission continued to pursue legal matters which were before the Courts, involving the Commission directly or in relation to legacy entities, pursuant to Section 63 of the Integrity Commission Act.

Detailed hereunder are the particulars of the Court proceedings involving the Integrity Commission (IC) for the reporting year:

Supreme Court Matters

1. Clava Mantock Snr et al v Dirk Harrison et al

The claim concerns a National Contracts Commission (NCC) Application which was submitted by the Claimants as Directors of Cenitech Engineering Solutions. Upon the completion of an investigation into the matter, Mr. Harrison, former Contractor General, concluded that the referenced application contained forged documents and inaccurate information. Mr. Harrison subsequently referred the matter to the Major Organised Crime and Ant-Corruption Agency (MOCA). Detective Simms, an employee of MOCA, executed the warrant in relation to the referenced charges and the prosecution was conducted by the Office of the Director of Public Prosecutions, for which a no case submission was thereafter upheld.

On July 27, 2020, the Claimants filed a claim against Mr. Dirk Harrison et al, seeking damages for false imprisonment and malicious prosecution.

On August 29, 2023, the Defendant filed the Notice of Application for Court Orders and supporting Affidavit to strike out the claim.

On May 16, 2025, the matter was heard and both parties gave oral submissions on the application before the court. Judgment was reserved and all parties are to return on October 10, 2025 for the court's decision.

2. Integrity Commission v Julie Malcolm

For the period 2022 – 2023, Ms. Julie Malcolm published defamatory statements on various social media platforms stating that the Commission, *inter alia*, “recreated” her complaint, “fabricated evidence”, and ‘stalled and silenced her complaint’ “via evidence tampering”.

Ms. Malcolm, continued to publish statements on her social media platforms, having named four employees of the Commission, as “criminals” who “perpetuate coordinated corrupt actions against [her] via evidence tampering: they discard evidence, fabricate their own evidence which they use as the basis of decisions” and who “lack the moral authority to continue in their roles” as they have “engaged in evidence tampering and intimidation of a complainant”.

Ms. Malcolm has also sought to attract attention to these defamatory statements by tagging a plethora of local and international media agencies, government entities, and parliamentarians, including the Hon. Edmund Bartlett, CD, MP, Minister of Tourism, who also acts as the Chairman of the Integrity Commission Oversight Committee.

On July 21, 2023, the Commission filed a Claim Form against Ms. Malcolm seeking damages, aggravated and/or exemplary damages, interest, cost and such further relief or other relief as the court deems just.

A Notice of Application for Court Orders and supporting Affidavit was filed on August 2, 2023 seeking injunctions (i) requiring the Defendant, her servants and/or agents to take down/remove all Twitter, YouTube, TikTok, Facebook and other social media posts relating to the Commission and allegations of corruption as well as (ii) restraining the Defendant, her servants and/or agents from uploading, publishing or communicating the posts to Twitter, Facebook or other social media

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platforms as well as any further words of the same or similar content as that of the videos and posts that are the subject of this order.

The hearing for Notice of Application for Court Orders was held on August 16, 2023, wherein the court ordered that the abovementioned injunctions be granted.

The Commission filed a Notice of Application to Strike Out Defence on October 17, 2023. On April 11, 2025, this Application was heard and granted by the court. It was also held that it is open to the Commission to have judgment entered and to have damages assessed, and at that time, the Commission can request a permanent injunction. The application for judgment to be entered in favour of the Claimants was filed on May 12, 2025.

On February 18, 2025, the Commission filed a Notice of Application for Contempt of Court Orders in relation to Ms. Malcolm. The matter came on for hearing on April 3, 2025, however, Ms. Malcolm was absent and unrepresented. The matter is to be heard on July 3, 2025.

3. Wallock v Integrity Commission

On January 18, 2024, the Commission became aware that Ms. Morjorn Wallock, former Director, Legal and Enforcement, National Environmental Planning Agency (NEPA), had filed an application for leave for judicial review as it relates to Report of Investigation concerning allegations of irregularities in the approval processes which led to the construction of a residential development located at #11 Charlemont Drive, Kingston 6.

Ms. Wallock was granted leave to apply for judicial review and it was ordered by the court that said leave operated as a stay of the findings, conclusions and/or recommendations made in relation to her by the Director of Investigations, until the final dispensation of the matter.

The matter was heard on January 22, 2025. On June 2, 2025, judgment in this matter was delivered. The orders and declarations sought in Ms. Wallock's Fixed Date Claim Form were refused as it was held that (i) the investigation process was fair and did not breach the rules of natural justice, (ii) the Commission's conduct of the investigation was not unreasonable, irrational or procedurally improper, (iii) the adverse findings made against the Claimant in the report were not unreasonable or irrational, and (iv) the Commission did not act ultra vires to the ICA.

4. Andrew Holness & Ors. v Integrity Commission & Ors.

On October 1, 2024, the Commission became aware, by way of the media, that Mr. Holness filed a Notice of Application for Court Orders for Permission to Apply for Judicial Review. The hearing

of the application was heard on November 7 and 8, 2024. Judgment in the matter was delivered on December 6, 2024 wherein leave was granted to the Applicants to bring a judicial review claim seeking orders of certiorari to quash the Commission's August 30, 2024 Investigation Report and Special Report, save for the paragraph which urged Parliament to develop policy and legislation to treat with the commercial and corporate activities of government Ministers and the likelihood of conflicts of interest. Leave to bring a judicial review claim seeking orders of mandamus to compel Mr. Craig Beresford, Director, Information and Complaints, to examine the Prime Minister's 2022 and 2023 statutory declarations and to Mr. Kevon Stephenson, Director of Investigation, to recommend to the Commission that the Prime Minister be exonerated of culpability, was refused.

The Fixed Date Claim was heard on January 7, 2025, wherein an order was made by the court that the hearing of the claim for judicial review and constitutional redress is scheduled for ten (10) days starting on October 13, 2025 and ending on October 29, 2025.

5. Norman Brown v Integrity Commission & Anor.

On November 18, 2024, the Commission was advised that Mr. Norman Brown, Director, Estatebridge Development Limited, filed an application for leave to apply for judicial review. The matter was heard on December 10, 2024 and judgment delivered on January 14, 2025. Leave to bring a judicial review claim against Mr. Kevon Stephenson, Director of Investigation, seeking orders of certiorari to quash certain paragraphs of the Commission's August 30, 2024 Investigation Report concerning recommendations and conclusions of breaches of the relevant tax legislation, was granted. Leave to bring a judicial review claim against the Commission, seeking orders of certiorari to quash certain paragraphs of the Commission's August 30, 2024 Investigation Report concerning recommendations and conclusions of breaches of the relevant tax legislation as well as conflict of interest concerns, was refused. A hearing of the Fixed Date Claim Form was scheduled for February 25, 2025.

The Applicant did not file and serve a Fixed Date Claim Form and the hearing date was vacated.

Memorandums of Understanding between the Integrity Commission and Competent Authorities

Section 7 of the Integrity Commission Act provides that the Commission, in the performance of its functions, may work in co-operation with any person or body as it may deem appropriate. Further, it provides that the Commission, with the approval of the Prime Minister, may enter into a Memorandum of Understanding or other agreement with a competent authority or a foreign agency whose functions are similar to the functions of the Commission.

The Memorandum of Understanding between the Commission and these competent authorities facilitates the sharing and exchange of information with and by the Commission, relating to the prevention, detection, investigation and prosecution of offences relating to acts of corruption, financial crimes or revenue collection.

The competent authorities prescribed by the Integrity Commission Act are the Director of Public Prosecutions, Attorney General, Tax Administration Jamaica, Financial Investigations Division, Major Organised Crime and Anti-Corruption Agency, Revenue Protection Division, Jamaica Constabulary Force, Jamaica Customs Agency, and a person or an agency of government designated as a competent body by the Prime Minister.

The Commission intends to enter into a similar Memorandum of Understanding with the Registrar General Department (RGD), Office of Public Procurement Policy (OPPP), Public Procurement Commission (PPC), and the National Environment and Planning Agency (NEPA), and is in the process of obtaining the Office of the Prime Minister's assistance in having same designated as competent authorities pursuant to Section 7(15) of the Integrity Commission Act.

The Commission is currently in the process of implementing MOUs with the Revenue Protection Division and the Jamaica Customs Agency. However, upon a recommendation by the Office of the Prime Minister, these MOUs are to be amended and approval sought from the Attorney General's Chambers in this regard.

Legal Assistance Provided to Other Divisions for the Reporting Year April 1, 2024 To March 31, 2025

The Legal Department provides general legal advice to the Commission, specifically its statutory and non-statutory divisions. The nature of the matters varies and primarily concerns the following areas: Contract Law, Employment Law, Commercial Law, Administrative Law, Procurement, and Anti-Corruption.

The following outlines a general overview of the legal support which was provided by the Legal Department for the reporting year April 1, 2024 to March 31, 2025:

General Legal Advice

- (a) Provided legal opinions and general legal advice on matters primarily concerning corporate, contract, commercial, administrative, and employment law.
- (b) Drafted and amended several internal policies and procedures to further guide the operations of the Commission.

Contracts, Lease Agreements, and other Agreements

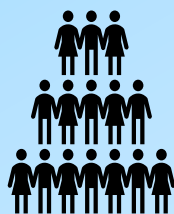
- (a) Reviewed and/or drafted contracts and other agreements in relation to the procurement of various goods and services; and
- (b) Negotiated, reviewed and/or drafted lease agreements and licences in relation to the lease and/or licence of the office locations and parking bays occupied by the Integrity Commission.

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Chapter 13 - Executive Office - Communications

Communication Dashboard

Human Resources Capacity



100%
(1 of 1 staff member)

The Communications Officer of the Integrity Commission plays a vital role in fostering transparency and strengthening internal and external communication. For the 2024/2025 Fiscal Year, the Communications Officer has made significant strides in enhancing the Commission's communication strategies, ensuring that messaging is clear, consistent, and aligned with the organisation's anti-corruption mission. As the Commission advances its mandate, the role of strategic communication remains integral to its success.

This report highlights the key achievements and activities undertaken by the Communications Officer for the 2024/2025 Fiscal Year.

1. Management of Public Education Campaign

During the period under review, the Communications Officer spearheaded the Commission's flagship initiative for the year, a ground-breaking public education campaign, which was the first of its kind to be undertaken by the Commission. This major initiative was executed by the Communications Unit, with the support of the Corruption Prevention, Stakeholder Engagement, and Anti-Corruption Strategy Division. The primary objectives of the campaign were to increase public awareness of the Commission's role, functions, and initiatives, and to promote transparency and accountability within the operational framework of public sector and state agencies. Launched in September 2024, the campaign employed a comprehensive multi-

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channel communication strategy to effectively reach a broad and diverse audience. This included:

- the use of social media posts and digital display ads to engage online audiences
- The use of newspaper advertisements to reach more traditional readers.
- Outdoor visibility was enhanced through strategically placed billboards and digital boards in Kingston, St. James and St. Ann.
- The campaign leveraged mass media with radio and television advertisements to maximize reach.
- To further deepen audience engagement, a JIS radio drama series was also produced, providing an informative and entertaining platform to highlight different examples of corruption and how they can be reported.

2. Implementation of Canva Pro Software

A proposal was created by the Communications Officer for the implementation of the Canva Pro Software. The purpose of this was to improve communication by enabling our team to produce high-quality, professional designs, including company brochures, booklets, monthly newsletters, social media content, presentations, etc. Upon the approval of the Executive Director, the software was implemented and is now actively being used by the Communications Officer and the Public Relations Officer.

3. Creation of Social Media Accounts

As part of efforts to strengthen the Integrity Commission's digital presence and broaden public engagement, in the third quarter of the financial year, two additional social media pages were created, Facebook and Instagram. These platforms were selected to reach a wider and more diverse audience, particularly younger demographics who are highly active on social media. The platforms are currently being used to share informative graphics from different divisions within the Integrity Commission.

4. Integrity Matters Newsletter

The "Integrity Matters" newsletter is produced monthly by the Communications Officer. This internal publication serves as a platform to disseminate important updates, share success stories, and promote a culture of integrity among staff. The newsletter has been well-received, providing valuable insights and fostering engagement across the organisation.

5. Provide Editorial Support and Advice

The Communications Officer has been actively involved in proofreading and editing documents to ensure accuracy, consistency, and adherence to organisational standards. By providing

editorial support, the Communications Officer has contributed to enhancing the quality of communication materials, including reports and official correspondence.

6. Graphic Creation and Caption Development

- During the reporting period, the Communications Officer developed a variety of graphics for both external and internal use. Externally, these visuals supported the promotion of the Integrity Commission's anti-corruption message, while internally, they were used to commemorate special occasions such as Independence Day, Breast Cancer Awareness Month, the annual Christmas party, International Women's Day, and Administrative Professionals Day, among others.
- The Communications Officer also assists the Corruption Prevention, Stakeholder Engagement and Anti-Corruption Division in the development of monthly social media content plans.

7. Media Management and Engagement

The Communications Officer serves as the primary liaison for all media inquiries. By providing timely and accurate responses to media requests, the Officer ensures consistent messaging and clear representation of the Commission's positions. To support ongoing media engagement, the Communications Officer also maintains and regularly updates the Commission's media contact list, ensuring strong communication channels with journalists, media outlets, and other key stakeholders. Additionally, social media platforms are monitored daily to stay informed of public discourse and mentions related to the Commission.

8. Email Monitoring (info@integrity.gov.jm)

The Commission's official email account is actively monitored to ensure the timely and efficient handling of incoming queries. All correspondence received is reviewed and promptly forwarded to the relevant division best suited to address the matter.

9. Dissemination of Information on Corruption

As part of its mandate to combat corruption, the Communications Officer actively shares relevant media articles and updates on corruption-related issues with staff and the Commissioners. By facilitating awareness and knowledge sharing, the Communications Officer contributes to strengthening the Commission's capacity to address emerging challenges and uphold integrity standards.

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10. Social Activities Club

The Communications Officer actively participates in the organization and execution of all social activities, providing support in relation to content development and dissemination to staff, as well as hosting events.

11. Training and Development

- **Internal-** During the period, the Communications Officer participated in a data protection training, which was conducted by the Data Protection Officer.
- **External-** The Communications Officer participated in a training and development course titled State Protocol and Business Etiquette, facilitated by the Management Institute for National Development (MIND).

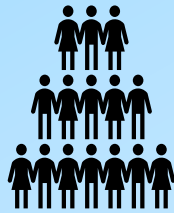
The activities undertaken throughout the reporting period highlight the critical role of effective communication in reinforcing the Integrity Commission's credibility and supporting its mission. Through the range of initiatives highlighted above, the Communications Officer has significantly enhanced the Commission's communication efforts. These initiatives have not only advanced the organisation's goals but have also promoted the core values of transparency, accountability, and integrity that form the foundation of the Commission's work.

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Chapter 14 - Executive Office – Data Protection

Data Protection Dashboard

Human Resources Capacity



100%
(1 of 1 staff member)

DATA PROTECTION & PRIVACY

Mission Statement

The Integrity Commission (the “**Commission**”) is committed to safeguarding an individual’s right to privacy and the personal data of individuals by adhering and complying with local and international laws, regulations and standards. The Commission seeks to build and maintain trust with our stakeholders through responsible personal data handling and implement effective data governance frameworks to ensure data security, mitigate risks, and prevent breaches. The Commission also strives to foster a culture of privacy by promoting awareness of the data protection standards. Ultimately, the Commission’s goal is to establish safe and ethical data-driven practices that prioritize full transparency, data protection, and uphold the rights of individuals to privacy.

The Data Protection Officer

Pursuant to **Section 20 of the Data Protection Act** (the “**DPA**”), certain categories of data controllers are required to appoint a Data Protection Officer (the “**DPO**”), including data controllers who are public authorities. The Commission, as a commission of Parliament, is defined as a data controller and public

authority under the DPA. As such, the Commission, in keeping with this obligation to appoint a DPO, did so in October 2023.

The Commission's DPO is responsible for independently monitoring the Commission's compliance with the DPA, as well as, overseeing and managing the implementation, on-going maintenance and improvement of the Commission's data protection and privacy compliance programme.

Our Data Protection Achievements

For the 2024 - 2025 fiscal year, the DPO has completed the following activities:

- a. amendment of the Commission's internal Data Protection Policy and Procedures to ensure that personal data is securely processed by the Commission's staff in compliance with the DPA and international best practice;
- b. creation and/or amendment of internal policies and procedures for various Divisions and Departments at the Commission related to information security and data protection;
- c. submission of the annual renewal of the Commission's data controller registration with the Office of the Information Commissioner ("OIC") that was submitted for the 2024 to 2025 fiscal year. At this time, the Commission is awaiting approval from the OIC regarding our submitted 2023/2024 data controller registration and our data controller registration renewal application;
- d. provision of advice on data protection and privacy matters, concerns and issues to the internal Departments and/or Divisions of the Commission;
- e. evaluation, assessment and risk analysis of new technologies and new personal data processing activities implemented by the Commission to ensure data security, compliance with the DPA and to identify and mitigate any potential data protection and privacy risks;
- f. evaluation, assessment and risk analysis of third parties that process personal data for and on behalf of the Commission to ensure data security, compliance with the DPA and to identify and mitigate any potential data protection and privacy risks;
- g. development and/or implementation of miscellaneous templates and legal documents for the internal Departments and/or Divisions at the Commission to ensure that their personal data processing activities comply with the DPA, particularly, the eight (8) data protection standards;

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- h. conduct sensitization and training sessions with all staff members from the various Departments and/or Divisions at the Commission to educate them about information security practices and their responsibilities under the DPA;
- i. review and/or amend the Commission's legal contracts, agreements and memoranda of understanding to successfully address all data protection concerns and ensure compliance with the DPA;
- j. coordinate and liaise with the Commission's Registry and Information Technology and Business Processes Departments to ensure that the Commission's personal data processing activities and the Commission's data protection and information security programs comply with the DPA and international best practices;
- k. review and update of the Commission's internal information security for all electronic and physical record to ensure that the confidentiality, availability and the integrity of the Commission's records are properly maintained. This involves the review and update of the Commission's internal policies, procedures, and organizational and technical measures to protect individuals' personal data from unauthorized access, use and/or disclosure;
- l. conduct periodic audits and gap analysis to highlight areas for improvement within the Commission's data protection and information security program, including the Commission's personal data processing activities and ensuring that detailed records of these personal data processing activities are recorded and documented;
- m. make recommendations to address concerns and improve resources for data protection and information security for all Divisions and Departments at the Commission.
- n. on-going conducting of data mapping exercise to identify, review and document all of the personal data processing activities at the Commission to ensure compliance with the DPA;
- o. development of the Commission's subject rights request management system, which will allow the Commission to properly and efficiently handle requests from individuals to access or rectify their personal data; and
- p. development of the Commission's personal data breach response plan to respond to data breaches, including the notification of authorities and impacted individuals.

Chapter 15 - Recommendations for Legislative Amendments and Best Practices

Recommendations Arising from Completed Reports of Investigations

During the course of the financial year, the Director of Investigation made several recommendations in keeping with Section 54 of the Integrity Commission Act and anti-corruption initiatives geared at improving public procurement and contract administration as well as improving systems of governance and eradicating corruption enabling devices.

The following recommendations and anti-corruption initiatives were made to Competent Authorities and other germane Ministries, Departments and Agencies:

- a) The Director of Investigation recommended that the Ministry of Labour and Social Security conduct continuous island-wide training and sensitisation sessions with all employees assigned duties in respect of the National Insurance Scheme so as to ensure that all NIS employees are *au fait* with the policies and procedures of the Ministry, touching and concerning the recovery of NIS contributions.
- b) The Director of Investigation recommended that Ministry of Labour and Social Security sensitise its employees around the principles of ethics and integrity, in an effort to prevent corrupt and unethical conduct and further that awareness sessions be conducted with NIS contributors, both employers and self-employed persons, regarding the proper method of making their NIS contribution and also for the implementation of measures to fraud proof NIS systems and processes, as well as, to prevent acts of corruption and other irregularities within the NIS.
- c) The Director of Investigation recommended that the Chief Executive Officer of the Kingston and St. Andrew Municipal Corporation implements additional measures to ensure adherence to the provisions outlined in sections 33 and 34 of the Building Act, in relation to its inspection and post permit-monitoring responsibilities/functions.
- d) The Director of Investigation recommended that the Kingston and St. Andrew Municipal Corporation (KSAMC) conduct an administrative review of its existing compliance regime with respect to building permits issued by that entity. This review should include a capacity assessment, both of the adequacy of the human resources available to the KSAMC for post-permit monitoring of building developments within the municipality's jurisdiction, as well as the technical competencies of the officers responsible for enforcement and compliance, and further that serious consideration be given to ensuring that the relevant processes are 'corruption proof'.

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- e) The Director of Investigation recommended to the Most Honourable Prime Minister and the Honourable Minister of Local Government and Community Development that as it relates to the need to ensure that developments occur within the built environment in a sustainable manner, that a legislation be established, which:
 - i. Imposes pecuniary penalties on developers who willfully violate building and development permits for financial gain. More particularly, profits attributable to breaches should be forfeited. Additionally, developers should also face debarment in respect of planning and development approval for an appropriate time period post breach; and
 - ii. Require collaboration and coordination between the Registrar of Titles, Local Authorities and other germane entities in a way which ensures that titles are not issued for developments which are constructed in breach of planning, building and development permits.
- f) The Director of Investigation recommended that the Ministry of Labour and Social Security adhere to the relevant provisions of the Public Procurement Regulations and the Government of Jamaica Handbook of Public Sector Procurement Procedures, in relation to the proper procedure to be employed when approving contract cost overruns and variations and further that the Accounting Officer ensures that necessary due diligence and project scoping be undertaken before proceeding to the contract stage. This will mitigate the occurrence of variations and cost overruns in the execution of contracts.
- g) The Director of Investigation recommended to the Cabinet Secretary and the Chief Public Procurement Policy Officer that there be clear rules governing the procedure to be followed where an accounting officer who is conflicted is a Permanent Secretary in an effort to remove any apparent ambiguity, so as to achieve consistency across government entities when implementing procurement procedures.
- h) The Director of Investigation recommended that the Department of Correctional Services implements critical internal policies to treat with procurement of goods and services and rental of facilities, in relation to the Carl Rattray Staff College, in an effort to provide guidance to the employees on the proper manner in which these activities are to be handled.
- i) The Director of Investigation recommended that the Department of Correctional Services implements controls to mitigate the chances of acts of corruption from occurring. The DI's recommendation is on the basis that as a result of the absence of controls and the monitoring of

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same, the Carl Rattray Staff College's facilities have been rented occasionally, without the knowledge of the Head Office in some instances, as well as without payment being accounted for, by the Head Office in other instances.

Chapter 16 - Appendices

Appendix 1- Days Taken to Complete the Investigation of Complaint and Referrals

For the financial year 2024/2025, 9 cases were completed by the Investigation Division. The average time taken to complete these cases is 518 days, see the table below for further details:

	Date Received	Matters/Cases	Employer	Date Closed	Days Taken to Complete
1.	2023-04-05	Dr. Andrew Holness	Houses of Parliament	2024-07-19	338
2.	2023-07-03	Mikael Phillips	Houses of Parliament	2024-07-16	277
3.	2023-07-13	Charlton McFarlane	Registrar General's Department	2024-04-23	194
4.	2023-01-25	George Callaghan	Sugar Industry Authority	2024-04-23	311
5.	2022-03-10	Ava Williams	Jamaica Customs Agency	2024-05-21	552
6.	2023-03-15	Concerning Allegations of 'an Act(s) of Corruption' in Respect of the Recovery of Outstanding National Insurance Scheme (NIS) Contributions at the Westmoreland Parish Office of the Ministry of Labour and Social Security (MLSS) for the period 2022 – 2023, Contrary to the Corruption Prevention Act.	N/A	2024-12-10	436
7.	2021-10-08	Concerning Allegations of Irregularities and Conflict of Interest in relation to the Operations of the Carl Rattray Staff College, Department of Correctional Services (DCS)	N/A	2024-09-17	740
8.	2020-02-10	Concerning Allegations of Impropriety and Irregularity in the Utilization of the Limited Tender and Direct Contracting Procurement Methodologies in the Award of Contracts to Nubian 1 Construction Limited for the period January 2016 to August 2019	N/A	2024-09-17	1425
9.	2024-07-11	Concerning Irregularities in Respect of the Construction of a Residential Development, Located at 2 Weycliffe Close, Beverly Hills, Kingston 6, Contrary to the Terms of the Building Permit Issued to Estatebridge Holdings Limited by the KSAMC.	N/A	2024-12-10	105
			Total		4378
			Average days Taken		486

Appendix 2- Areas of Impact-Contract Monitoring Unit

The more frequent types of anomalies observed during the course of our monitoring include, but are not limited to:

Non-Construction Contracts

1. The issuance of Tender Documents with the incorrect the reference source for the Public Procurement Commission. Same is an error in the Standard Bidding Document that is frequently overlooked by procuring entities;
2. Issuance of incorrect Standard Bidding Document in relation to the procurement undertaking. That is, where the appropriate tender document is not utilized for the procurement opportunity thereby limiting competition and equity in some instances and/or exposing the government to the risk of limited coverage in the absence of terms and conditions;
3. Evaluation criteria not clearly defined. The distinction between assessing on least cost or most advantageous has on numerous occasions had to be clarified by the Commission as same were frequently used interchangeably or incorrectly; and
4. Award criteria not expressly stated. The absence of same can impact the outcome of the opportunity and as such, the Commission has sought to ensure that same is never inferred but always explicitly stated.

Construction Contracts

1. Contract having expired however, works being undertaken without approved Extension of Time;
2. Poor quality works i.e. honeycombing in concrete;
3. Delayed payments to contractor by implementing Agencies resulting in cash flow issues and reduction or halting of works;
4. Health and safety issues i.e. absence or inadequate safety or directional signs; and
5. Slow progress of works.

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During the course of the Financial Year, the Division, as a part of its core functions provided the following recommendations to Public Bodies in respect of the Procurement Process:

No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
1	April 2, 2024	Jamaica Customs Agency	Supply and Delivery of Twelve (12) Portable Evaporative Coolers for the Agency's Locations Islandwide Ref No: JCA/2023/402B	1. Differing warranty periods stated at separate clauses in the Tender Document; 2. No breakdown of scoring provided based on the quality of client referrals received; and 3. The procurement is for 12 units, however, the quantity in Section V of Tender Document states 20 units; and 4. Inconsistency with final place of destination stated.	That the entity issues an addendum to clarify the warranty period, provide a breakdown of the scores allocated to the quality of the ratings received from clients, verify the quantity and physical units and the final place of destination.	No response from the Public Body
2	April 8, 2024	Overseas Examinations Commission	Supply, Delivery and Installation of Desktop Computers to selected Secondary Schools Island-wide Ref No: RFQ:OEC-024-G-01	1. Incoterms method omitted; 2. Incorrect date provided for the applicable date of rate of exchange for bids submitted in other currencies, based on bid submission deadline	That the entity issues an addendum to indicate the Incoterm method which applies to this procurement and clarify the date for the exchange rate.	An addendum was issued on April 15, 2024 specifying the incoterms method and clarifying the date for the exchange rate.

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
3	April 11, 2024	St James Municipal Corporation	River Training Works Retirement River, Pitfour/Granville, St. James	Representatives from the Commission visited the referenced project site on April 4, 2024, and noted the following concerns: - a. The project has not progressed since our previous visit December 20, 2023; b. The site appeared to be abandoned; and c. There is a load of debris at the end of the current drain which is preventing storm water from passing under the road. This water is now pooling and has become a breeding ground for mosquitoes, which is a health hazard to the Community and the Contractor's Team.	A letter was drafted to the Entity requesting the following: a. Details of the reason for the halt/delays in the completion of the project to include all correspondents between the contractor on the matter; b. The date for the recommencement and completion of the project; c. A copy of all updated Bonds and Insurances submitted by the contractor; d. A copy of all claims for Extension of Time submitted by the contractor, and the respective responses by the Municipal or its authorized representatives; e. A copy of the contractor's latest revised and approved Works Programme/Schedule; and whether Liquidated Damages will be applied to the Contractor given that the contract period has elapsed. If the answer is in the affirmative, kindly provide all supporting documents	Entity stated that the delays were attributable to National Water Commission pending pipe works to be executed within the vicinity. Further that they will not be seeking liquidated damages owing to the delays being outside of the Contractor's control.
4	April 17, 2024	National Irrigation Commission Limited	Supply and Delivery of SDR 26 Polyvinyl Chloride (PVC) Bell and Joint Pipes for Upper and Lower Rhymesbury, Clarendon Ref No: NIC/B 05/2024	1. Inconsistency with clauses in Tender Document as it relates to the basis on which bids will be evaluated 2. Required documents to be submitted can be found at 4 different clauses in Tender Document	That the entity issues an addendum to amend ITB 37.3(a) to include the other criteria outlined on page 29 of the tender document and develop a comprehensive list that captures all the required documents to be presented at bid submission	The Entity stated that the Bidding Document was amended and uploaded to Gojep

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
5	April 17, 2024	National Education Trust (NET)	Construction of a Chairlift Shaft & associated works & Supply, Delivery, Installation, Commissioning & Testing of Chairlift's Equipment & Fixtures at Sydney Pagon, St. Elizabeth	Correspondence was drafted to the entity requesting the following: a. Details on the design modification for the Chairlift, to include all correspondents between the Client, Contractor and Supplier on the matter;b. Cost and time implications for the change in scope of the project; and c. A copy of the contractor's latest revised and approved Works Programme/Schedule.		The Entity stated that the cost for the change in scope will be covered by the contingency sum.
6	April 29, 2024	Jamaica Urban Transit Company (JUTC)	Provision of Wrecker / Towing Services for one year Ref No: LO-0206/24	Incorrect URL provided to access PPC's website	We recommended that the entity be mindful of the correct URL for future procurement opportunities.	N/A
7	May 9, 2024	Church Teachers' College	Mandeville – The Construction of a Language & Writing Laboratory on the College's Main Campus	Discussions with Miss Yaneika Flemmings from CTC reveal that the contractor has not submitted any Extension of Time request subsequent to the agreed revised completion date of February 2024. Works are ongoing but behind schedule and the contractor has not provided a revised Works Schedule so the intended completion date is unclear. Further reference is made to a Site Visit conducted by representatives of the Commission on April 17, 2024 where it was observed that the external wall finish appears poorly done but is already painted. The wall finish according to the Bills of Quantities is "12 mm Thick cement sand (1:3) as specified and finished with a wood float..." while the Drawings indicated a "Rough Stucco Finish Matching Existing Walls". CTC was asked to confirm which of these finishes was the agreed finish.	Given the circumstances, we recommend that the CTC applies Liquidated Damages as per the contract and that the Contractor is informed of the condition of the wall and to advise him to make good on this item of work.	The College advised the Contractor to make good the poor finishing and the College accepted the finishing as per the Bill of Quantities

INTEGRITY COMMISSION

No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
8	May 10, 2024	Jamaica Urban Transit Company (JUTC)	Provision of Heavy-Duty Wrecker Truck Ref No: LO-0205/24	<ol style="list-style-type: none"> 1. Incorrect Public Procurement Commission's URL provided 2. Incoterms edition and method omitted 3. No award criteria specified (lowest priced / most advantageous) 	That the entity issues an addendum to indicate the Incoterms edition and method which applies to this procurement and specify the award criteria whether it be lowest priced or most advantageous. The entity was also urged to be mindful of the correct URL for future procurement opportunities.	The JUTC stated that there was an oversight on their part which caused item 1 and 2 not to be addressed prior to the bid opening.
9	May 16, 2024	National Water Commission (NWC)	Janitorial Services for NWC's Eastern, Western and Southern Locations for Three (3) Years, Lots 1 - 3 Ref No: CP-09/2024	<ol style="list-style-type: none"> 1. Conflicting deadlines for clarifications provided 2. Conflicting deadlines for bid submission provided 3. Conflicting deadlines for submission of bid security provided 4. Incorrect Public Procurement Commission's URL provided 5. Instructions provided to international companies making a submission, however, procurement method being utilised is NCB 6. Omission of a sub-category (firms with 2 - 3 years of experience) in the evaluation criteria 	That the entity issues an addendum to clarify the deadline for clarifications, bid submission, the hardcopy submission of bid security, verify the procurement method being utilized and make the necessary adjustments to the evaluation criteria. The entity was also urged to be mindful of the correct URL for future procurement opportunities.	The NWC accepted the recommendations , amended their tender document and issued the relevant addenda.
10	May 17, 2024	Western Regional Health Authority (WRHA)	The Procurement of Medical Equipment for Health Facilities within the Western Region Lot 1 Ref No: Ref #:23/24-WRMU-0096 Lot 2 Ref #: 23/24-WRMU-0075	<ol style="list-style-type: none"> 1. Incoterm method omitted. 2. No criterion was provided as to which approach the bids will be evaluated against (lowest priced / most advantageous) 3. No Evaluation and Qualification criteria provided 4. Discrepancy with the payment schedule (reflecting total payments of 110% of contract price) 	That the entity issues an addendum to indicate the Incoterms method which applies to this procurement, specify the award criteria, whether it be lowest priced or most advantageous, develop the Evaluation and Qualification Criteria and amend the payment schedule.	The WRHA accepted the recommendations , amended their tender document and issued the relevant addenda.
11	May 21, 2024	e-Learning Jamaica	Procurement of Interactive Displays for Schools Island-wide Ref No: NCB-ELJ2024-ID004	<ol style="list-style-type: none"> 1. Incorrect Public Procurement Commission's URL provided 2. Conflicting bid opening timelines 3. Bid Security required, however, the form it is to be presented in was omitted 4. Customer Reference 	That the entity issues an addendum to clarify the bid opening date, specify what form the bid security should be presented in and advise if the Customer Reference Form is mandatory, and if so, amend the	e-Learning accepted the recommendations and issued the relevant addenda.

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
12				Form attached was not listed as one of the required documents to comprise the bid	list of required documents and inform how many references are required.	
	May 24, 2024	National Land Agency (NLA)	Supply and Delivery of Motor Vehicles (2 Lots) Ref No: NLA/CSD/017/ MAY 2024	1. Inconsistency in the reference number quoted 2. Incoterm edition and method omitted	Entity was encouraged to ensure that the correct reference number is used for consequent records and that the Incoterms edition is included for future procurement.	Entity noted our concerns and indicated that they will be mindful for future opportunities.
13	June 10, 2024	National Works Agency (NWA)	Southern Coastal Highway Improvement Project, Boston to Drapers, Portland, Package No.12	A site visit was conducted on May 30, 2024, and the following were noted: a. The construction of the retaining wall in the vicinity of Blue Lagoon has increased but the pace of the work is significantly slow; b. The Contractor must be commended on the quality of the asphalt surface finish for the areas which are completed;	Requisition letter sent to NWA requesting- a. An update on the project to include the percentage (%) completion and reasons for delays; b. A copy of all claims for Extension of Time submitted by the Contractor, and the respective responses by the NWA or its authorized representative;	The Entity stated that the delays were as a result of pipeline supply and installation works follow-on contract. The pipelines conflicted with the civil works which could not be completed until the pipeline was completed and commissioned in its entirety.
14	June 10, 2024	Post & Telecommunications Department (P&TD)	Provision of Static Security Guard Services in Lots for P&TD	There was no mention of the minimum number of vehicles that will be required and the corresponding score should the Bidder fail to provide ownership.	That the P&TD revise this requirement to include the minimum number of vehicles to attain the maximum score of 5 points and a further score should the Bidder fail to provide that minimum number, similarly to the criterion "Evidence of Employment".	Addendum was made to remove the proof of ownership of security vehicles to perform the service.
15	June 10, 2024	Vocational Training Development Institute (VTDI)	Provision of security guard (2 Lots)	The bidding document was missing the bid opening date	The entity issues an addendum which states the bid opening date so all suppliers can be aware for transparency	Issued an addendum on GOJEP posting their bid opening date

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
16	June 13, 2024	National Housing Trust (NHT)	General Construction Works - Lacovia Police Station, St. Elizabeth	<p>During a site meeting held on May 29, 2024, where representatives of the Commission were in attendance and a subsequent walk-thru of the building it was observed that the last stairs riser to the first-floor landing, is approximately 50 mm (2") higher than the other risers. This is of concern as this variance has the potential to be a trip hazard whether ascending or descending the stairs.</p> <p>A review of the Contract Drawings, sheet 14 of 15, entitled Stairs Details shows the stairs risers and threads to be 7" and 12" respectively. The accompanying Stair Notes, item number 6, states Maximum Variation in Height of Risers or Width of Treads in any given flight 1/4".</p>	<p>Requisition letter sent to NHT requesting::</p> <p>The procedure that the NHT will employ to ensure that the contractor effect remedial works to the stairway to make it as per drawing or at a minimum, safe for the use intended.</p> <p>Additionally, it was noted that the surfaces of the fixed door jambs and stops on the upper floor which are already painted, are rough and will require sanding to be of an acceptable standard. Kindly inform us of the measures that will be taken by the NHT to have these defects addressed.</p>	<p>NHT had written to the Contractor regarding the observed defects. The Contractor acknowledged the defects and indicated that they will be addressed in short order.</p> <p>NHT stated that if the defects were not adequately rectified by the scheduled site visit of July 9, 2024 then Liquidated Damages will be applied.</p>
17	June 18, 2024	Vocational Training Development Institute (VTDI)	Provision of security guard (2 Lots)	Site visit date was changed for lot 2 but not issued via an addendum	The entity issue an addendum so all suppliers can be aware for transparency	Issued an addendum on GOJEP altering the potential suppliers of the date change
18	June 20, 2024	Northeast Regional Health Authority (NEHRA)	Supply, Delivery and Installation of Sterilizer at CSSD Department, St. Ann's Bay Hospital: Ref No: G/2023/009: -	1. Evaluation Committee was one member 2. Documentations submitted as proof of Procurement Committee approval are not signed by the Chairman of the Procurement Committee, his/her designate, or any other member of the Procurement Committee	1. The entity establish Evaluation Committees for a fair and objective evaluation of bids in keeping with the procedures of public procurement for all future procurement undertakings 2. The entity solicit the assistance of the Office of Public Procurement Policy regarding obtaining a refresher training in the primary principles and practices of public procurement undertakings	The Entity stated that as a result of COVID-19 the standard 3 member evaluation committee was not possible and there has been a subsequent delay in fully reconvening those meetings. Nonetheless, steps were being put in place to rectify the matter. NERHA further explained that prior to May 1, 2024, the chairman of the committee was not located on site and all meetings were held via
19			Supply, Delivery, Installation and Commissioning of Dental Equipment Ref no: G/2022/013: -			
20			Procurement of Preventative Maintenance Services for a period of One (1) year for Anaesthesia and Ultrasound			

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
21			Machines at across the Region Ref No: S/2022/022:-			Zoom wherein the approvals were received. A new Committee has since been established and return to face to face meetings where the relevant forms will be signed.
22			Supply, Delivery and Installation and Commissioning of Laboratory, Dental Equipment and Furniture for New Buff Bay District Health Centre, Portland Ref No: G/2022/011:-			
23			Supply and Delivery of Computers and Printers -Ref no. G/2021/003			
24			Supply, Delivery, Installation and Commission of Medical Equipment and Furniture for new Physiotherapy and Laboratory Building at the Annotto Bay Hospital Ref No: G/2022/012:-			
			Supply, Delivery, and Installation of Industrial Washers at Port Maria Hospital and port Antonio Hospital Ref No: G/2023/008: -			
25			Provision of Security Services for St. Mary and Portland Health Facilities Ref No: S/2022/001			

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
26			Provision Supply, Delivery and Installation of three (3) new package Fresh Air – Air Conditioning Units for Operating Theatres 1 & 2 and Recovery Area at the St. Ann's Regional Hospital, St. Ann;			
27			The Removal and Replacement of Morgue Refrigerator for Storage of Bodies at St. Ann's Bay Hospital Ref No: G/2023/010:-			
28			Procurement of Preventative Maintenance Services for a period of One (1) year for Anaesthesia and Ultrasound Machines at across the Region (retender) Ref No: S/2021/006			
29			Supply, Delivery, Installation and Commissioning of one (1) Ceiling Mount Radiographic Unit for the St. Ann's Bay Regional Hospital Ref No: G/2023/002: -			
30			Pre-& Post Architectural Consultancy Services for the Design and Construction of a Regional Nephrology Centre at the St. Ann's Bay Regional			

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
31			Hospital.- Ref no. S/2023/038			
	June 20, 2024	Northeast Regional Health Authority (NEHRA)	Supply, Delivery and Installation and Commissioning of Laboratory, Dental Equipment and Furniture for New Buff Bay District Health Centre, Portland Ref No: G/2022/011:	The entity in their bidding document said the contract would not be awarded in lots and then proceeded to award contracts based on lots	The entity adhere at all times to the evaluation criteria as stated in the published Tender Document. The entity was further urged not to include an additional criterion or exclude any established criterion during the evaluation process as same can be perceived as prejudicing the process	NERHA stated that the items were not awarded in lots and that that there was an error in the BDS where both options were left, and that, 'by Lot (s)' should have been deleted. However, having stated 'Not Applicable' for the number, identification and names of the lots comprising the NCB at ITB 1.1, the only remaining option is to evaluate and award contracts on a per item basis. This is what was done.
	June 21, 2024	Passport Immigration Citizenship Agency (PICA)	Procurement of Armoured Courier Services	The Bidding Data Sheet (Section II.), states the contract period is two (2) years, while in the Terms and Conditions states the contract period is for three (3) years.	Clarification to which contract period will be used and, an addendum to be made clarifying the right contract period be issued.	Addendum issued to correct the contract duration to three (3) years.
	June 21, 2024	Western Regional Health Authority (WRHA)	Procurement of Cleaning and Portering Services at the Western Child and Adolescents Hospital (WCAH) for Two (2) Years	Conflicting award criteria stated: ITB 41 stated most advantageous, while the Evaluation Criteria stated lowest responsive bidder.	That the entity issues an addendum to specify the award criteria whether it be lowest priced or most advantageous	Addendum issued stating the entity shall award the contract to the bidder whose bid is deemed most advantageous
34	June 21, 2024	Port Authority of Jamaica (PAJ)	Procurement of Grounds and Landscape Maintenance Services at Montego Bay Free Zone for Two (2) Years and Landscape Maintenance Services for the	The clarification deadline and the bid opening date and time were not stated in the tender document although they were stated in the Competition Details located on GOJEP	That the entity ensure that these important dates form a part of the Bidding Document.	The tender document was updated to include the dates.

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
			Falmouth Cruise Ship Pier for Three (3) Years			
35	June 24, 2024	HEART/N STA	Procurement of Pest Control Services by Lots	The entity in their bidding document had 2 locations in their bidding document which no longer existed	The entity issues an addendum which removes the locations that doesn't exist under HEART/NSTA	Issued an addendum on GOJEP with an updated address listing for pest control services
36	June 24, 2024	Jamaica Information Service (JIS)	Procurement of security guard services 2024-2025 for JIS (Morant Bay Regional Office	The Bidding Data Sheet (Section II.), did not outline that bidders must present a copy of their Tax Compliance Letter (TCL).	That an addendum to be made stating the requirement of a Tax Compliance Certificate.	JIS advised that they acknowledged our recommendations , however, was unable to act on them due to the passage of Hurricane Beryl.
37	June 28, 2024	Management Institute for National Development (MIND)	Consulting Services for the Development & Pilot of Online Public Sector Orientation & Re-orientation Course Ref#: MIND-603/3/53-FHR/PRO-V1	<p>1. The document uploaded via GOJEP was edited as it is not the Standard Bidding Document to be used;</p> <p>2. No referral forms were attached; and</p> <p>3. Based on the evaluation criteria on page 8, points were allotted for the submission of completed referral forms, however, no mention was made about the quality of the referrals received.</p>	<p>Re-do the Tender Document utilizing the GOJ Standard Bidding Document for Consultancy Service, located on the Ministry of Finance website; Annex CS3 – Procurement of Consulting Services (Request for Proposal RFP) and that you resubmit the corrected Tender Document to the GOJEP platform.</p> <p>Also, to insert the referral forms that bidders are required to populate in the revised tender document and amend the evaluation criteria to make the scoring more objective based on the overall rating the entity receives (for e.g. bad, good, excellent etc.).</p>	MIND stated that the Tender Document used was downloaded from the Ministry of Finance's website and that the exclusion of a referral form was to ensure that bidders provided evidence of undertaking consultancy projects, of the nature and complexity equivalent to the scope of works, without the limitations of a prescribed form.
38	June 28, 2024	Tax Administration Jamaica	Procurement of Furniture, Fixtures and Equipment (Christiana Tax Office) Lots 1-6	Incorrect Public Procurement Commission's URL provided	The entity was urged to be mindful of the correct URL for future procurement opportunities.	N/A

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
39	June 28, 2024	Jamaica Constabulary Force	Procurement of Air Conditioning Units for Stony Hill Police Station	1. Conflicting reference numbers listed; and 2. Incorrect Public Procurement Commission's URL provided.	That the entity clarify the reference number of the procurement and to be mindful of the correct PPC URL for future procurement opportunities.	N/A
40	July 1, 2024	Students' Loan Bureau	Procurement for the Supply of Computers and Laptops for the Bureau. Ref #: SLB-CAL-06/2024	1. Bid Opening date/time was omitted 2. Bid submission deadline invalid 3. Incorrect URL provided for PPC's website	That the entity issues an addendum to clarify the bid submission deadline, stipulate the date/time of bid opening and to be mindful of the correct PPC URL for future procurement opportunities.	Addendum issued rectifying all issues identified
41	July 07, 2024	JSIF	Anchovy Integrated Infrastructure Project	The tender closed on July 3, 2024, however, the same opportunity was reposted on GOJEP on July 4, 2024, with an extended deadline of a week due to Hurricane Beryl as bidders could not submit. Both projects were active on GOJEP which led to confusion as they were the same project with different deadlines.	It was recommended to the public body to remove the expired one and inform all interested suppliers and issue an addendum for clarity.	The Public Body issued an addendum and removed the expired tender opportunity.
42	July 9, 2024	Ministry of National Security	Procurement of Information Technology Equipment and Office Supplies (Lots 1-6) Ref No: MNS2024/05/072	1. Bid submission deadline and the bid opening date/time were both stated as same 2. Date of exchange rate conversion inconsistent with bid closing date	That the entity issues an addendum to amend the date for the conversion of exchange rate. Also, the Ministry is being urged to pay closer attention to important dates when drafting the Bidding Document.	Addendum issued with rectified bid submission deadline and opening date/time and corrected date of exchange rate conversion
43	July 10, 2024	Ministry of National Security	Procurement of Architectural, Mechanical, Electrical and Plumbing (MEP), and Quantity Surveying Services for the Construction of the Savanna-La-Mar Police Station Ref No: MNS2024/06/152	Bid submission deadline and the bid opening date/time were both stated as same	That the entity pays close attention to these important dates when drafting the Bidding Document.	Dates amended through clarification

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
44	August 19, 2024	Jamaica Social Investment Fund (JSIF)	Mendez Town Farm Road Rehabilitation, Trelawny	Reference is made to a Site Visit conducted by representatives of the Commission on July 16, 2024 where it was observed that the finish to the joints in the rubble stone walls was poorly defined. Based on the contract drawings, these joints were to be well defined yet on the ground this was not done. There is also no clear description in the Bills of Quantities or Drawings to instruct the contractor on the exact method to finish the joints, hence the results seen. The top of the walls also appears to be unfinished. According to the Bills of Quantities, for each Rubble Stone Wall there is a line item which states, "...in coping on top of retaining wall..." but no copings were on top of the retaining walls. Additionally, the rips raps were poorly finished. The current state of them will not allow for proper flow of water and/or debris to the discharge points. The ends of the 75mm PVC weep holes on one particular wall were roughly cut and can be made good for a more finished look. Also we requesting a copy of the Practical Completion Certificate and Defects List.	The Commission recommended that JSIF inform the contractor of the condition of the walls, rip raps and weep holes and advise him to make good on these items. Further the JSIF should ensure that better care is taken in the creation of Bills of Quantities as they should be as detailed as possible to prevent any similar occurrence in the future.	The entity advised that the issues identified will be resolved during Defects Period and that there was no provision made for the finishes to the face of the rubble stone wall in the Bill of Quantities.
45	August 26, 2024	Jamaica Civil Aviation Authority	Provision of Quarterly Servicing of Mini Split and Air Conditioning Units at Various Locations for Three (3) Years Ref No: RFP#2024-JCAA-16	1. Incorrect URL provided for PPC website; 2. Bid Opening date/time was omitted from the tender document	That the entity be mindful of the correct PPC's URL for future procurement opportunities and to ensure these important dates are included in the Bidding Document.	N/A

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
46	August 26, 2024	Ministry of Education, Youth & Information	Provision for Electrical Consultancy Services - St. Elizabeth and Manchester Schools Ref No: MOEY/ELECTRICALCONSULTANCY/70/2024/2025	1. Conflicting award criteria stated in bidding document vs. competition details via GOJEP; 2. No client reference form provided; 3. Conflicting minimum technical qualifying scores stated; and 4. Date of exchange rate for currency conversion incomplete.	That the entity issues an addendum to clarify which evaluation/award criteria will be utilised in determining the successful bidder, upload the required client reference form for bidders to populate, specify the minimum technical qualifying score and advise the date of exchange rate in its entirety for bids that are quoted in currencies other than JMD.	The Ministry addressed all concerns through the issuance of an addendum
47	August 26, 2024	Ministry of Education, Youth & Information	Provision of Electrical Consultancy Services Ref No: MoEY/Electricalconsultancy/68/2024/205	1. Conflicting award criteria stated in bidding document vs. competition details via GOJEP; 2. No client reference form provided; 3. Conflicting minimum technical qualifying scores stated; and 4. Conflicting reference numbers quoted within tender document.	That the entity issues an addendum to clarify which evaluation/award criteria will be utilised in determining the successful bidder, upload the required client reference form for bidders to populate, specify the minimum technical qualifying score and clarify the correct reference number governing this procurement.	The Ministry addressed all concerns through the issuance of an addendum
48	August 29, 2024	National Irrigation Commission Limited	SUPPLY AND DELIVERY OF FIVE (5) MULTIFUNCTION LASER PRINTERS AND ONE (1) SINGLE FUNCTION LASER PRINTER Ref No: NIC/Q12/2024	Conflicting award criteria stated in bidding document vs. competition details via GOJEP	That the entity pays closer attention to these finer details to ensure consistency and avoid any ambiguity to potential bidders.	N/A
49	August 30, 2024	Court Administration Division	Procurement for the Design, Installation and Commissioning of 62.7-kW Grid-Tied Solar Photovoltaic System Ref No: 2024-08-13-01PROJ	1. Conflicting deadlines for the submission of clarifications; 2. Incoterms edition and method were omitted; and 3. Incorrect URL provided for PPC website.	That the entity issues an addendum to amend ITB 8.1 with the accurate amount of days for the submission of clarifications, specify the Incoterms edition and method and to be mindful of the correct PPC URL for future procurement opportunities.	Addendum issued.

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
50	September 3, 2024	Ministry of Education, Youth & Information	Provision of Electrical Consultancy Services for Papine High, Oberlin High, Mona High, Holy Trinity High, Mountain View Primary and Haile Selassie High Ref No: MoEY/Electrical Consultancy/69/2024/2025	1. Conflicting deadline stated for the submission of clarifications 2. No client reference from attached 3. Conflicting minimum technical qualifying score	That the entity issues an addendum to clarify the deadline for the submission of clarifications, specify the minimum technical qualifying score and upload the required client reference form for bidders to populate.	Addendum issued to clarify deadline for submission of clarifications and minimum technical qualifying score, client reference form uploaded via GOJEP
51	September 6, 2024	Forestry Department	Procurement of Network Distribution Switches	1) The ITB Clauses referenced in the Bid Data Sheet do not correspond with the clauses in Section 1 "Instructions to Bidder"; 2) ITB 1.3 of the Bid Data Sheet refers to "hard copy procedures" which has become obsolete in GOJ procurement proceedings; 3) ITB 35.3(a) of the Bid Data Sheet refers to the evaluation being done on the basis of by item, however, the Commission is uncertain whether it is the intention of the Department to award the contract as a single lot or contracts per item, as same was not expressly stated. Additionally, we make further reference to the "Schedule of Requirements" in Section V of the Bidding Document. We note from same that the type of switches was indicated, however, the number of each, was not stated; 4) The Evaluation criteria set out in the "Terms of Reference" does not include points and weights; and 5) The total number of switches counted in the "Terms of References" amounts to 14 instead of 12 as mentioned in the Tender Document.	1) We recommend that the Department issues an addendum amending the Bid Data Sheet to match the related clause for clarity; 2) The Commission therefore recommends removing the phrase "hard copy procedures" to avoid any confusion; 3) To issue an addendum ensuring that the quantity for each item be expressly stated so that bidders can be appropriately informed when preparing and proposing bid prices; 4) That the Department apportions points to each criterion and sub criterion (as necessary) for a more fair and transparent process; and 5) Issue an addendum to clarify the total number of switches.	Opportunity cancelled.

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
52	September 6, 2024	Jamaica Constabulary Force	The Supply, Delivery and Installation of Five (5) Washing Machines and Four (4) Dryers for Specialized Operations Ref No: NCB#:JCF/NCB-2024-09-0086	<ol style="list-style-type: none"> 1. Conflicting reference number 2. Date of tender opening precedes deadline for bid submission 3. Incoterms method not specified 4. Conflicting number of required client referrals stated 5. No breakdown provided which outlines the score allocated based on the quality of client referrals received 	That the entity issues an addendum to specify the date of the tender opening as the opening date cannot precede the submission date, outline the Incoterms method applicable to this procurement, clearly state the number of client referrals required and provide a scoring system which addresses the quality of referrals received. We are also suggesting that JCF pays closer attention to the finer details (inconsistent reference number), to ensure consistency and to avoid any ambiguity for potential bidders.	Addendum issued to clarify deadline for bid submission and tender opening. Tender document amended to reflect correct reference number, advised Incoterms method as DDP, clarified the number of client referrals required and advised Least Cost Selection (LCS) methodology will be used to award the contract to the supplier who has met all the specifications
53	September 9, 2024	North East Regional Health Authority	Supply, Delivery and Installation of Sterilizer at CSSD Department, St. Ann's Bay Hospital: Ref No: G/2023/009:	<ol style="list-style-type: none"> 1. NERHA agreed to a price adjustment with the contractor for an additional 4 million dollars to obtain the item subsequent to the signing of the contract due to the contractor quoting the wrong price. 2. The delivery date for the steriliser has passed the 10 weeks agreed in the signed contract. 3. NEHRA did not do proper due diligence in the evaluation as the model proposed by the contractor did not reflect the requirements that NEHRA set out in their BDS 	Authority terminates the contract and retender the opportunity	The opportunity was not cancelled as NERHA contends that a cancellation and re-tender will lead to further delays and a higher expenditure.
54	September 9, 2024	North East Regional Health Authority	Supply, Delivery, Installation and Commissioning of Dental Equipment Ref no: G/2022/013:	NEHRA overlooked a contractor due to past poor performance in a procurement opportunity, however, there were no clauses in the BDS that contractors would be judged based on past performance	Advised NERHA that a new criterion should not be introduced in the evaluation process to uphold fairness and transparency for further projects.	NERHA stated that they relied on Clause 19 (1) (e) (ii) of the Public Procurement Regulations to disqualify the Bidder.

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
55	September 9, 2024	North East Regional Health Authority	Supply, Delivery and Installation and Commissioning of Laboratory, Dental Equipment and Furniture for New Buff Bay District Health Centre, Portland Ref No: G/2022/011	NEHRA contravened their own award criteria as set out in their BDS by awarding a contract in lots or items that should have been awarded as a single lot.	Advised NERHA to solicit training from the Office of the Public Procurement.	NERHA stated that greater care will be taken for future opportunities.
56	September 9, 2024	North East Regional Health Authority	Supply, Delivery, and Installation of Industrial Washers at Port Maria Hospital and Port Antonio Hospital Ref No: G/2023/008:	Industrial Washers procured by NEHRA within 5 months had noticeable rusting based on observations made on July 16, 2024	Advised NERHA to seek remedy from the supplier as they should have a 3 year warranty period.	The recommendation was not addressed by NERHA
57	September 16, 2024	Ministry of Economic Growth and Job Creation	Procurement of Staff Transportation Services August 2024	1) The Bid document did not specify a contract period nor a Bid Opening date; 2) The numbering sequence between Instructions to Bidders (ITB) Clause 3 on page 6, through ITB Clause 14 on page 9, appears to be inconsistent. Same can be perplexing and otherwise misleading, particularly where the Bid Data Sheet (BDS) references a clause that upon consulting the ITB, cannot be found; and 3) Requests for clarifications are to be forwarded to an email address provided instead of being posted directly on the GOJEP portal using the clarifications tab.	An Addendum be issued to clarify the following: 1. the Tender Opening date and the contract duration; 2. amending the Bid Data Sheet to match the related clauses for clarity; and 3. redirecting bidders to the electronic procurement portal for clarifications whereby the queries and subsequent responses can be visible to all stakeholders	No bids were received and the concerns and recommendations will be addressed prior to the re-tender.
58	September 16, 2024	Universal Service Fund (USF)	Procurement of Repairs and Maintenance Service for National Broadband Project- Regions 1-4 for Two (2) Years	Item No 1. of the Evaluation Criteria (Quality of Bid Submission) is subjective, and needs to be clearly defined as to what qualifies the bid submission as excellent, good, or satisfactory.	Recommendation that an addendum be issued to clearly define what qualifies a bid submission as excellent, good, or satisfactory.	The entity stated they will issue an addendum to clarify the evaluation criteria and provided the Commission with the amendments.

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
59	September 16, 2024	Western Regional Health Authority	Provision of Heating, Ventilation and Air Conditioning Consultancy Services for the WRHA Ref No: 24/25-WRMU-0052	The qualification requirement for Technicians was not provided	That the entity issues an addendum to clearly outline the minimum qualification requirement for Technicians.	Entity advised that the criteria for Technicians were erroneously listed as a requirement. Team Leader / Mechanical Engineer points increased to 30.
60	September 17, 2024	Northeast Regional Health Authority (NERHA)	Procurement of Goods – The Supply and Installation of Surgical Lights for the Port Antonio Hospital & St. Ann's Bay Hospital NCB No: G/2024/009	Tender opening date was not included in the tender document	Issue an Addendum to include Tender Opening	Issued an addendum including tender opening date
61	September 19, 2024	National Fisheries Authority (NFA)	Procurement of Twenty (20) Boats and Engines. REF. No: NFA/G0096/24	<ol style="list-style-type: none"> 1. Bids are to be in lots, however, while the types of boats were listed in the Technical Specifications, it was not specified in the Bid Data Sheet; 2. Entity did not specify the award criteria in accordance with the Instructions to Bidders Clause 41. 3. Section III, Evaluation and Qualification Criteria, number 3 states that the contract may be awarded to the bidder with the least price or the most advantageous bid. 4. That the Bid Security should be stated as a figure and not a percentage 	<p>Recommendation was that an addendum be issued to clarify the following:</p> <ol style="list-style-type: none"> 1. The lots that are applicable to this procurement be specified in the BDS; 2. The award criteria that will be applied, whether it be most advantageous or least cost; and 3. State the actual value of the bid security. 	Addendum was issued to clarify that the procurement is not in lots, that the award criteria is for least cost and the bid security must be \$100,000.00.
62	September 20, 2024	National Education Trust	Construction of a Classroom Block at Bridgeport High School	<ol style="list-style-type: none"> 1. Honeycombing noticed on the stairs; 2. Undulations in the steel float floors; and 3. Lack of preparation for the installation of fire suppression system. 	We recommended that an assessment of the honeycombing of the stairs and undulation in the steel floating of the floor be done and state the methodology to be used.	The entity by way of later dated October 7, 2024, stated that the consulting engineer had already issued a site instruction for remedial works to be undertaken by the contractor.
63	September 20, 2024	Department of Correctional Services (DCS)	Procurement of Cold Room for Horizon Remand Centre	Tender Document did not include scope/specification in respect to items being procured.	The tender to be withdrawn and retendered.	No response from the Public Body

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
64	September 25, 2024	Tax Administration Jamaica	Procurement of Smart Conference Room Solution - Christiana Tax Office Ref No: TAJ-NCB-GDS-2024/2025-06/006	1. Conflicting required warranty period stated 2. Incorrect URL provided for PPC website	That the entity issues an addendum to clarify the required warranty period and are also being urged to be mindful of the correct PPC's URL for future procurement opportunities.	Addendum issued.
65	September 27, 2024	Ministry of Education, Youth & Information	Provision of Electrical Consultancy Services for Fair Prospect High, Brimmer Vale High, Marcus Garvey Technical, Brown Town High, Aabuthnott Gallimore High and William Knibb High Ref No: MoEY/Electrical Consultancy/83/2024/2025	1. Time omitted re: deadline for submission of clarification in tender document, however, listed under Competition Details via GOJEP 2. Conflicting pre-contract duration stated 3. Evaluation criteria re: Technical Approach and Methodology and Work Plan provided no breakdown of scoring as to the level of details of each received (for e.g. comprehensive, sufficient, vague)	That the entity issues an addendum to include the cut-off time for the submission of clarifications, clarify the duration of the pre-contract phase and provide a further breakdown of scoring, based on the quality of Technical Approach and Methodology and Work Plan received.	Addendum issued.
66	October 15, 2024	Jamaica Constabulary Force	Supply, Delivery and Installation of Office Furniture and Appliances for the Frome Police Station in Westmoreland Ref No: JCF/NCB-2024-09-0092	Incorrect URL provided for PPC website	The entity is being urged to be mindful of the correct PPC's URL for future procurement opportunities.	N/A
67	October 15, 2024	Jamaica Constabulary Force	Supply, Delivery and Installation of Office Furniture and Appliances for Little London Police Station in Westmoreland	Incorrect URL provided for PPC website	The entity is being urged to be mindful of the correct PPC's URL for future procurement opportunities.	N/A
68	October 22, 2024	Jamaica Urban Transit Company (JUTC)	4 Ton Forklift	The maximum weight score totaled 95 points instead of the 100 points.	Addendum be issued to clarify the total maximum weight.	Addendum issued clarifying the total points.

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
69	October 24, 2024	Ministry of Legal and Constitutional Affairs	The Supply of One (1) Commercial Passenger Bus (Coaster) (New) (Retender)	i. ITB 22.1 of the bid data sheet states that bidders are required to submit a bid security, however, the bid security value was not stated and; ii. ITB 28.1 of the bid data sheet states that the bid opening exercise will be done on October 4, 2024, at 11:00 am, while the deadline for bid submission is on October 28, 2024, at 11:00 am.	i). Entity must issue an addendum to state the value of the bid security and; ii). State the correct date and time for the deadline of bid submission and tender opening.	Addendum issued.
70	October 24, 2024	North-East Regional Health Authority (NERHA)	Remedial Works to Complete Construction of Physiotherapy, Lab, etc at the Annotto Bay Hospital	1. There were multiple ceiling tiles with visible evidence of water damage and mold on both floors. Mold poses a significant health hazard to those on the construction site and if not dealt with correctly will negatively impact the end users of the facility; 2. Hollow floors tiles were observed on the ground floor; 3. Rough finishes to the internal walls were noted throughout the building; 4. Some sections of the screening to the roof slab were deteriorating and are likely to be a cause of the observed water damage; and 5. The drain pipes along the edge of the roof slab were installed at higher elevations than the slab level. This will cause a reduction in the flow of stormwater from the roof and result in ponding.	We recommend that an assessment of the leaks and mold are to be done and a copy of the approved methodology to rectify these issues be provided to the Commission.	The Entity stated that the team is aware of the issues and the matter is being thoroughly investigated.
71	October 29, 2024	Ministry of Labour and Social Security	1.Consultancy to Support the Assessment of Post-Secondary and Tertiary Institutions for Academic Inclusion of Persons with Disabilities. 2. Consultancy-Social Work in The Public Sector: Towards Development and Collaboration.	1)The Document issued by the Ministry, in both instances, was not a Standard Bidding Document (SBD), but instead, a mere Terms of Reference. 2) The document did not outline the criteria that will be used to weigh bidder's capabilities and/or responsiveness to the Ministry's requirements. 3)The published Terms of Reference documents made mention of a commencement date of February 2024, which we have opined is an oversight by the Ministry.	The Commission recommended the following: 1. that the Ministry develops and issue the appropriate SBDs in keeping with A7.1 of the Government of Jamaica Handbook of Public Sector Procurement Procedures; 2) that the Ministry develops an Evaluation Matrix outlining key evaluation criteria and sub-criteria (if and/or where	No response from the Public Body

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
					applicable) to bring greater objectivity and transparency to the process; and 3) Include the correct date in the documents	
72	October 31, 2024	Ministry of Labour and Social Security	Provision of Janitorial Services for the Ministry of Labour & Social Security for Two (2) Years (2024-2026) Ref No: MLSS/NCB/NC S/07/091	1. Tender Document missing opening date and time. 2. The Appendix for site visit schedule missing	The Ministry, in the interest of transparency, issues an addendum stating Bid opening date and time, as well as, an addendum attaching "Appendix A" that contains the Site Visit schedule for the interest of all stakeholders.	Tender was cancelled
73	October 31, 2024	National Land Agency	Supply and Installation of Air Conditioning Units (5 Lots) Ref No: NLA/CSD/043/OCTOBER2024	1. The Incoterms edition and method were omitted 2. Warranty is required for A/C units, however, this was not mentioned in the checklist containing the required documents to comprise the proposal.	That National Land Agency indicates the Incoterms edition/method and also to include any documentation deemed as pertinent in the checklist, for future procurements.	Response received November 14, 2024. Addendum could not be issued as bid submission deadline had already passed.
74	October 31, 2024	Tax Administration Jamaica	Procurement for Architectural Services for the Construction of the Portmore Tax Office at Lot 4, Portmore Town Centre Ref No: TAJ-NCB-CS-2024/2025-07-003	1. Bid submission deadline and tender opening date/time stated as same time 2. Terms of reference stated conflicting durations for pre-contract phase 3. Evaluation criteria re: Architect's experience could provide further breakdown of scoring for individuals with lesser experience	That TAJ issues an addendum to clarify the bid submission deadline and tender opening date/time, confirm the duration of the pre-contract phase and provide a further breakdown of the scoring allocated to the experience of the lead Architect.	Addendum issued clarifying bid submission deadline, tender opening date/time, advising that the duration of pre-contract phase is six (6) months and evaluation criteria amended.
75	November 6, 2024	JUTC	Provision of Dry Box Body Truck with lift Gate	Conflicting award criteria noted within the Tender Document	That the entity issues an addendum to clarify which award criterion will be used	Entity issued an addendum to clarify the award criteria

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
76	November 14, 2024	Registrar's General Department	Procurement for the Purchase and Installation of Fire Suppression System in Data Centre at RGD Procure/Con/85 /24-25	1. The Commission noted that neither the contract award nor bid evaluation criteria were clearly defined, therefore, it is uncertain of how the evaluators will objectively assess and recommend a preferred bidder. Although Clause 33.2(e) of the Bid Data Sheet outlines several factors that could be used to assess bidders, no points and weights were apportioned to same to make them assessable. 2. Incorrect URL stated in the BDS for more information	1. RGD extends the bid submission deadline while it expeditiously determines and defines the most suitable evaluation and award criteria for this opportunity. 2. Be mindful for future procurement opportunities of the correct URL	Tender was cancelled
77	November 14, 2024	Electoral Office of Jamaica	Replacement of UPS System – ECJ/RPL-UPS/2024-10	ITB 17.6(a) of the BDS specifies the place of final destination for the procured items as 43 Duke Street, however, the location differs from the technical specification schedule which lists an additional location on Red Hills Road. Based on the foregoing, we are requesting that the EOJ clarifies whether delivery is required at one or both locations	The Commission recommends that the EOJ issues an addendum clarifying same in the interest of the bidders and for complete transparency	Tender was cancelled
78	November 19, 2024	Western Regional Health Authority	Procurement of one (1) Double Cab Pick-up for the Western Regional Health Authority Ref No: 24/25-WRMU-0079	1. Conflicting bid opening time (tender document vs competition details via GOJEP) 2. Conflicting award criteria (stated as Most Advantageous in tender document, however, evaluation criteria more aligned to Least Cost Selection)	That WRHA issues an addendum to clarify which award criteria will be utilise to award the contract and to pay closer attention to these finer details to ensure consistency and avoid any ambiguity to potential bidders.	The tender document was updated to clarify the award criteria
79	November 19, 2024	Ministry of National Security	The Supply, Installation and Maintenance of Air Conditioning Units for Jamaica Eye and the JCF Communication Sites Ref No: MNS2024/09/344	1. Incorrect URL provided to PPC's website 2. Conflicting bid validity period stated (120 days / 150 days) 3. Conflicting bid submission deadline provided 4. Conflicting tender opening date stated 5. Date of currency conversion conflicting	That the Ministry of National Security issues an addendum to clarify the bid validity period, the bid submission deadline, the date of tender opening and the date for exchange rate conversion. The Ministry is also being urged to be mindful of the correct URL to PPC's website for future procurement opportunities.	All recommendations were accepted and the tender document amended

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
80	November 19, 2024	Western Regional Health Authority	The Supply and Delivery of Four (4) Ambulances to the Western Regional Health Authority Ref No: 24/25-WRMU-0080	1. Conflicting award criteria stated (LCS and Most Advantageous) 2. Issue with evaluation criteria as it relates to compliance with delivery schedule	That WRHA issues an addendum to clarify to potential bidders, which award criteria will be utilised by the entity to award the contract, in order to avoid confusion. Also, we are suggesting that the latest delivery date and/or the scoring criteria for the delivery time be amended.	Addenda issued addressing the recommendations
81	November 19, 2024	Southern Regional Health Authority (SRHA)	Procurement of CCTV Equipment for Regional Office.	Incorrect URL provided for PPC website	The entity is being urged to be mindful of the correct PPC's URL for future procurement opportunities.	Entity issued an Addendum which clarified the PPC's website.
82	November 20, 2024	DCS	Preventative Maintenance Services of Standby Generators.	Incorrect URL provided for PPC website	The entity is being urged to be mindful of the correct PPC's URL for future procurement opportunities.	N/A
83	November 20, 2024	Ministry of Justice (MOJ)	Procurement of Supply, Advertisement & Rental of Billboards in Various Parish Capitals	No tender opening date and time listed within the tender document	That the entity issues an addendum to clarify the tender opening date and time	MOJ noted that the omission was inadvertent and going forward additional checks will be made to prevent a reoccurrence
84	November 20, 2024	National Chest Hospital	Procurement of Sluice Sinks SJGRC	1. Entity stated that the standstill period was not applicable. The IC informed them that once the procurement is of a certain value then the standstill period becomes mandatory 2. No award criteria was stated	1. The the entity indicates the timeframe for the standstill period if the procurement is above \$1.5 mil; and 2. The award criteria be stated	Response received, however, the Entity did not address the concerns raised.

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
85	November 26, 2024	National Works Agency (NWA)	The Widening of Grange Lane to Four (4) Lanes from Municipal Boulevard to Augusta Drive & Installation of Potable Water & Sewerage	Reference is made to a site meeting that was held at the contractor's office on November 14, 2024, where respective members of the contracting party and the Commission were present. During the referenced meeting a critical issue observed was the contractor's assertion of experiencing cash flow problem due to non—payment of claims for the months of July, August and September 2024, which has affecting his ability to pay suppliers and will affect the progress of the works. In this regard, reference is made to Clause 14.6 of the Contract Document which states, "... Thereafter, the Engineer shall within 28 days after receiving a Statement and supporting documents, issue to the Employer an interim Payment Certificate..." and Clause 14.7 of the Contract Document which states, <i>inter alia</i> , that " <i>The Employer shall pay the Contractor... (b) the amount certified in each Interim Certificate within 56 days after the Engineer receives the Statement and supporting documents...</i> ". Based on the protracted delays in honouring the contractor's Claims, it is evident that payments to the contractor have not been in accordance with the terms and conditions of the Contract. It was, however, observed that notwithstanding the delays in payment, the contractor continued to work in earnest towards the agreed completion date. Additionally, it was observed that the contractor's request for an Extension of Time which was reportedly submitted on August 22, 2024 and completion of designs for the Bus Shed	The IC requested an explanation as to the cause for delays in timely payments to the contractor, and going forward, how the NWA intends to resolve the issue of outstanding and current payments in a manner that will afford a continued smooth performance of the project. Additionally, kindly advise us on the timeline for completion of the referenced activities.	NWA provided a schedule that should mitigate the delays in payments

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
86				are longstanding matters which require an urgent resolution to allow for the continuity of the project.		
	December 2, 2024	Western Regional Health Authority	The Procurement of Private Security Services for the Cornwall Regional Hospital and the Western Children and Adolescent Hospital for 1 Year Ref No: 24/25-CRH/WCAH-11-24	Incorrect URL provided to PPC's website	The Ministry was urged to be mindful of the correct URL to PPC's website for future procurement opportunities.	N/A

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
87	December 2, 2024	Real Estate Board/Commission of Strata	Procurement of Data Analysis Software for Monitoring and Risk Assessment of Real Estate Practitioners and Strata Corporations	The deadline for clarification and the submission deadline on the cover page of the bid document is conflicting with the dates stated in ITB 25.1 and ITB 28.1. of the Bid Data Sheet (BDS)	An addendum to be issued to clarify the deadline for clarification date and the submission deadline date.	Tender document was amended.
88	December 5, 2024	Montego Bay Community College	Supply and Delivery of Toner to the Montego Bay Community College	No Tender Opening Date and Time listed within the tender document although same was included in the Gojep Notice.	Recommended that the tender opening date and time be included in the tender document for future opportunities	N/A
89	December 5, 2024	National Housing Trust (NHT)	Anchovy Police Station, St. James	During a site meeting that was held at the project site on November 20, 2024, which was attended by the respective members from the various stakeholders and the Integrity Commission (IC), attendees were informed by the Project Manager, of a critical occurrence on the project whereby there was structural compromise of the verandah section of the building, during excavation for the proposed sewage holding tank. Consequently, the Contractor had to demolish the compromised section of building. The subsequent ensuing discussion was enlightening but inconclusive in respect of the probable cause of the incident.	A letter was sent to the Entity requesting: a. Whether any methodology to construct the sewage holding tank, was proposed or agreed on between the NHT and Contractor; b. Whether the proposed sewage holding tank works is treated as a variation to the main contract; c. An engineer's report on the structural integrity of the building and the area adjacent to the verandah; and d. The NHT's next course of action for completion of the works.	The Entity stated that they were exploring three options for resolving the issue and in the interim the Contractor was collecting field data in relation to the current ground elevations relative to the building to inform the proposed design. A design to support the building and construction of the holding tank was proposed by CHEC as an alternative resolution. NHT will be assessing the options provided.
90	December 6, 2024	Rural Water Supply Limited	Procurement of Supply & Installation of Gas Chlorination Equipment Ref No: RWSL-ENG-CHL-2024-11	1.Clause 37.3(a) of the Bid Data Sheet (BDS) stated that evaluation will be conducted using the least cost methodology, however, this contradicts Clause 41.1 which states that the award will be made in keeping with the most advantageous methodology. 2. The Commission notes that the entity requested a myriad of documentation pertaining to the bidder's financial capacity and technical experience,	1.The Commission recommends that RWSL either withdraws the procurement opportunity or extends the bid submission period while it expeditiously determines and defines the most suitable evaluation and award criteria for this opportunity	Procurement opportunity withdrawn

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
91				however, there is no evidence of how the requested information will be used in the assessment of the bids, particularly, because the document is void of an evaluation matrix to objectively assess and score the bidders		
	December 11, 2024	MOAF	1. Procurement of Supply & Delivery of 250 Dairy Heifers. 2. Consultancy Services for Design Cold and Waste Piping System	Incorrect URL provided for PPC website	The entity is being urged to be mindful of the correct PPC's URL for future procurement opportunities.	N/A
92	December 13, 2024	Houses of Parliament	Procurement of Two (2) Motor Vehicles HIGH ROOF A/T Buses (HOP-020-11-005-FMB-RFQ-G	ITB 4.2 of the Bid Data Sheet stated that for more information on the Public Procurement Commission's (PPC) classification, bidders should utilize the following URL "http://www.ocg.gov.jm	Issue an addendum correcting the URL to http://ppc.gov.jm	Addendum issued
93	December 20, 2024	NERHA	The Supply and Installation of Furniture for Belfield Health Centre, St. Mary – G/2024/008B	<p>1. The procurement opportunity was tendered as a single lot, however, we note that during the evaluation process, "The project was split into three parts" which consequently resulted in the award of multiple contracts. This of course, is a major deviation from Clause 1.1 of the Bid Data sheet which specified that the opportunity would not be undertaken in lots and further, Clauses 35.3 and 36.6, which specified that the bids would be evaluated and the contract awarded as a single lot.</p> <p>2. The Commission notes that the Authority has not provided a detailed Evaluation Report for any of the opportunities nor has it provided evidence of approval by the Procurement Committee.</p> <p>3. The Commission also notes the clarification response given to a bidder on the GOJEP platform regarding "Partial Quotations" to which the Authority responded "Good day, Kindly quote</p>	<p>1. The Authority was advised that where an award cannot be made based on the criteria stated in the solicitation document, the opportunity is to be withdrawn and retendered using the most suitable procurement methodology.</p> <p>2. That the Authority is to adhere at all times to the evaluation and award criteria stated in the published Tender Document. While the Authority seemingly sought to be cost-effective in selecting items from various bidders, the Authority must also seek to uphold the principles of fairness and transparency in the procurement undertaking by adhering to the criteria outlined in the document.</p> <p>3. The Commission wishes to advise the authority that simply</p>	NERHA stated that the document was incorrectly amended and that templates have been created for future opportunities to prevent a reoccurrence

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94				on what you have offering. We are aware that furniture and electronics are different disciplines hence the reason different PPC categories were requested"	listing two different PPC categories does not constitute partial bidding. Rather, it suggests that bidders with either of the two categories can submit bids for the entire lot	
	January 8, 2025	Ministry of Legal and Constitutional Affairs	The Supply and Delivery of Computers and Accessories	<p>i. No deadline for clarification was mentioned in the bid data sheet; and</p> <p>ii. ITB 20.1 (b) of the bid data sheet states that Manufacturer's Authorization is not required, however, Section IV Bidding Forms states that the Manufacturer's Authorization is applicable</p>	<p>a. State the date and time for the clarification deadline; and</p> <p>b. State whether or not the Manufacturer's Authorization is applicable.</p>	Addendum issued

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
95	January 20, 2025	Court Management Services	Procurement of Kiosk Booths for the Judiciary (Re-tender) Ref#: CAD-Kiosks-G6-12-2024	<p>1. ITB 4.2 of the BDS stated for more information on the Public Procurement Commission's (PPC) classification, the website "http://www.ocg.gov.jm" should be visited, however, the correct URL to the PPC's website is "http://ppc.gov.jm";2. ITB 14.1(g) listed the various documents to comprise the bid, which includes a client referral form, however, no form was provided;3. ITB 21.1 advised that the bid validity period shall be ninety-one days, i.e. January 6, 2025 to April 6, 2026, however, the period should end on April 6, 2025;4. Contracts are awarded to the bidder whose bid has been determined to be the lowest priced or the most advantageous. No criterion was provided as to which approach the bids will be evaluated against;5. The Evaluation Criteria (page 31) specified that to establish eligibility, domestic suppliers should submit valid TCC and PPC certificate at bid submission deadline on March 14, 2024, however, the deadline was previously stated as January 6, 2025; and6. Page 31 states that Overseas Contractors need not be in possession of a valid TCC and PCC at the time of bid submission, however, as the National Competitive Bidding method is being used, overseas suppliers and local suppliers must meet the same eligibility requirements. As such, overseas suppliers should provide a valid TCC and PPC at the time of bid submission and not prior to contract award, to maintain fairness and equal competition among bidders.</p>	<p>Given that the bid submission deadline has passed, kindly advise whether any overseas bids were received and whether they provided a valid PPC and TCC at the time of submission. Additionally, the Commission is recommending that the Court Administration Division pay closer attention to these finer details to ensure consistency and to avoid any ambiguity to potential bidders for future opportunities.</p>	Clarifications issued to potential Bidders

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
96	January 21, 2025	Water Resources Authority	Supply and Delivery of ICT Equipment 2025-01-16-A	<p>i. In ITB 14.1 (g), (if applicable) is noted next to Manufacturer's Authorization. However, section ITB 20.1 (b) does not clarify whether Manufacturer Authorization is required;</p> <p>ii. ITB 14.1 (g) of the Bid Data Sheet (BDS) indicated that client reference is to be submitted, however, no client referral form was provided;</p> <p>iii. No standstill period stated;</p> <p>iv. Subjective evaluation criteria; and</p> <p>v. Stated delivery time ambiguous.</p>	<p>a. Whether or not a Manufacturer's Authorization is required; client referral forms to be provide to potential bidders;</p> <p>c. Include the number of days for the standstill period;</p> <p>d. Amend the evaluation criteria to make it objective;</p> <p>e. Clarify the delivery time; and</p> <p>f. Indicate that the specifications listed in the table are minimum mandatory specifications.</p>	Response received January 31, 2025 and the entity issued an addendum incorporating all recommendations .
97	January 23, 2025	Ministry of National Security	Construction Works at the Warsop Police Station (Trelawny).	<p>Representatives of the Integrity Commission (IC) on January 15, 2025, visited the referenced project site and the following was observed and/or noted: -</p> <p>1. The progress of the works has not improved since the Police Officers moved back in to the police station;</p> <p>2. The remaining rehabilitation works been executed is been undertaken with an inadequate work force;</p> <p>3. The project is approximately two (2) weeks away from the second revised completion date which for the second time, will not be achieved based on the slow pace of the works.</p>	<p>The Commission is requesting that you provide the following documentation/information: -</p> <p>a. An update on the project to include the percentage (%) completion and reasons for delays, if any;</p> <p>b. A copy of the contractor's latest revised and approved Works Programme/Schedule; and</p> <p>c. Please indicate whether Liquidated Damages will be applied to the Contractor given that the approved revised completion date will elapse January 31, 2025.</p>	The Ministry provided the reasons for the delays and stated that they will consider the activation of Liquidated Damages where warranted.

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
98	January 27, 2025	National Education Trust (NET)	Construction of a Classroom and Science Block at Cedric Titus High School, Trelawny	<p>Representatives of the Integrity Commission (IC) on January 15, 2025, visited the referenced project site and the following was observed and/or noted: -1. The progress of the works has not improved since the last visit conducted December 4, 2024;2. The formwork and reinforcement bars for the slab roof have been erected since December 2024 and the slab still has not been poured;3. The rendering to the walls is been conducted by a small team given the magnitude of work remaining and the time remaining on the contract;4. The sewage system remains to have open excavations which are a hazard to both the students and contractor's team;5. Multiple task which could have been started remain at halt because the Contract is awaiting information from the consultants such as sewage line grades and electrical information;6. The Contractor also indicated that the lengthy time it takes to receive payment has become a reason for delays experienced on the project.</p>	A letter was sent to the entity requesting the following:a. Plans by the Entity to get the project back on schedule to be completed within a timely manner.	The NET provided a project schedule and details of plans to improve the pace of the project.

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
99	January 29, 2025	National Education Trust (NET)	Construction of an Administrative Block (lot 1) at Mount Saint Joseph Catholic High School, Mandeville, Manchester	Representatives of the Integrity Commission (IC) on January 14, 2025, visited the referenced project site, attended the monthly site meeting and the following were observed and/or noted: - 1. the Contractor must be commended for the detailed report presented at the site meeting; 2. the progress of the works is significantly behind schedule as the Contractor reported 9% completion while approximately 25% of the contract period had elapsed; 3. the terrain and extensive excavation undertaken by the contractor in relation to the overall contract period do not seem to align; 4. the size of the contractor's team on site appeared to be insufficient for the magnitude of work remaining; and 5. there were other works on site which could have been executed simultaneously by the contractor to make up on time loss.	The Commission requested that the Entity provide the plans to get the project back on schedule to be completed within a timely manner.	The NET provided a letter from the Contractor that outlined the measures to be implemented.
100	January 30, 2025	SCJ Holdings Limited (SCJH)	Construction of Storage Pond 2 in Salt Pond Bernard Lodge South Development	During a review of the project it was noted that the Contractor has not been paid for works completed	The SCJH was written to requesting the following documentation/information: a) a copy of any payment certificates with the relevant attachments submitted by the contractor, as it is apparent that the contractor has not been paid to date; b) details of the reason for non-payment of funds to the Contractor as at October 28, 2024 despite the date of termination being July 22, 2023; and,	The SCJH stated that the Contractor is in breach of contractual obligations resulting in a substantial sum of money being owed to the SCJH.

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
101	January 30, 2025	Southern Regional Health Authority (SRHA)	Redeveloped Entry and Construction of Eastern Boundary Wall at the May Pen Hospital – Package 1	We note the Extension of Time request from the Contractor, BOS Blocks & Tiles dated December 16, 2024. This was submitted four (4) days after the scheduled completion of the contract. In future, the Extension of Time submission from the Contractor should be provided with sufficient time for the request to be reviewed and approved before the completion date of the contract.	Correspondence was sent to the Entity requesting the reasons for the delays and the number of requested days.	Observation not addressed by the Entity, however, they provided the reasons for the delays and the requested days.
102	February 3, 2025	North-East Regional Health Authority (NERHA)	Remedial Works to Complete Construction of Physiotherapy, Lab, etc at the Annotto Bay Hospital	Representatives of the Integrity Commission (IC) on January 28, 2025, visited the referenced project site and the following was observed and/or noted: - 1. the site was vacant, none of the Contractor's or subcontractor's workmen were on site; 2. majority of the doors to the building were locked; 3. there is no security on site; 4. the progress of the works is significantly behind schedule with less than two (2) weeks remaining for the scheduled completion; 5. there are multiple external and internal activities which can be executed outside of the HVAC scope.	The Commission requested the following: a. details on how the entity intends to address the observations listed; b. an update on the project to include the percentage (%) completion and reasons for delays, if any;	NERHA stated that the reasons for delay was due to a change in the funding source and that since the recommencement of the project significant progress has been made.
103	Feb. 6, 2025	Institute of Jamaica	Procurement of Security Services	1. Incorrect URL provided for PPC website 2. No standstill period was specified within the tender document 3. The award criteria was not explicitly stated.	The entity is being urged to be mindful of the correct PPC's URL for future procurement opportunities.	1. Entity advised of oversight and advised that the matter will be corrected. 2. Standstill period was provided via GOJEP 3. Information will be uploaded as an addendum and will be uploaded via GOJEP.
104	Feb. 6, 2025	Ministry of Agriculture and Fisheries	Procurement of Motorcycle	1. Incorrect URL provided for PPC website 2. Request for the submission of clarification was same as bid submission deadline 3. No standstill period was stated	Pointed to sections of the Public Procurement Regulation/Act in respect to Clarification and the Standstill period respectively. Additionally, urging	1. Entity advised that the recommendations were noted for future procurement opportunities. However, the procurement was

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
105					the entity to be mindful of the correct PPC's URL for future procurement opportunities.	cancelled due to no responses received.
	February 14, 2025	Jamaica Bauxite Mining Limited	Supply, Delivery, Installation and Commissioning of 100kW Solar Photovoltaic System at the Jamaica Bauxite Mining Limited (JBM) Port at Reynolds Pier Ocho Rios, St. Ann - JBML NCB-2025-02-10 POR/03	1. Inconsistent deadline for bid submission 2. Inconsistent tender opening time	That the entity issues an addendum to clarify the deadline for bid submission and date/time of tender opening.	Recommendations accepted. Addendum issued to rectify same.
106	February 19, 2025	Western Regional Health Authority	Provision of Private Security Services at the St. James Public Health Services for 1 Year Ref No: NCB-PSS-STJ-01-25	1. The Tender document did not specify the form that the bid security should take 2. The summation of points for the "Client Reference Form" totals 80 points instead of 100 points	That the entity issues an addendum, stating the form in which the bid security should take and clarify the total points allocated to the client reference form.	Recommendations accepted. An addendum was issued to participating bidders via GOJEP
107	February 26, 2025	South East Regional Authority	Procurement of Cleaning and Portering Services at the Kingston Public; Spanish Town and Victoria Jubilee Hospitals	1. ITB 4.8 of the Bid Data Sheet stated that for more information on the Public Procurement Commission's (PPC) classification, bidders should utilize the following URL "http://www.ocg.gov.jm" 2. The BDS stated that the most advantageous method would be utilized, however, based on the evaluation criteria, it was observed as the lowest responsive bidder.	Monitoring commenced subsequent to bid submission, therefore the recommendation was to remain mindful for future procurements	N/A
108	February 26, 2025	Court Administration Division	Procurement of Kiosk Booths for the Judiciary (Re-tender) Ref#: CAD-Kiosks-G6-02-2025	1. Inconsistent deadline for bid submission 2. Date for exchange rate conversion preceded the date of tender issue 3. No criterion was provided as to which approach the bids will be evaluated against.	That the entity issues an addendum to clarify the bid submission deadline, the date for exchange rate conversion and specify the award criteria.	Recommendations accepted. Addendum issued to rectify same.
109	Feb. 26, 2025	RADA	Supply and Delivery of Four (4) 4WD Heavy Duty Agricultural Tractor under the Production	1. Incorrect URL provided for PPC website 2. Request for the submission of clarification was same as bid submission deadline 3. No standstill period was stated	Issue an addendum, advising stakeholders of the clarifications made.	Addendum issued.

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
110			Incentive Programme			
	Feb. 27, 2025	UTECH	Supply and Delivery of Dental Materials for the College of Oral Health Sciences	1. Incorrect URL provided for PPC website2. The language used in in sections of the tender document are ambiguous and could be interpreted differently by all stakeholders.	Requested clarification of the matter.	UTECH stated that the statement regarding negotiations should not have formed part of the tender document.
111	March 10, 2025	TEF	Maintenance Services at the Artisan Village.	1. Clarification date was not explicitly stated.	Issue an addendum, advising stakeholders of the correct date	Dates amended through clarification
112	March 10, 2025	Factories Corporation of Jamaica	Procurement of Security Guard Services (Unarmed) at Factories Corporation Sites 2025-2028 (3 Years) Ref No: FCJ/CS/02/2-2025	The Bid Evaluation Criteria stated that each referral is scored out of a maximum of 40 points, however, upon examination of the Client Referral Form attached, the total points amount to 30.	That the entity issues an addendum to clarify the maximum points allocated to each Client Referral Form.	Addendum issued and amended Client Referral Form uploaded reflecting 40 points

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
113	March 10, 2025	Court Administration Division	Procurement of Motor Vehicles for Court Administration Division Ref No: RFQ# 2025-G51-CAD-MV6	<p>1. The referenced procurement opportunity which was undertaken via the National Competitive Bidding (NCB) methodology was published on March 04, 2025, and indicated a closing date of March 06, 2025, which represents a two-day notice period. The foregoing is not sufficient and runs counter to the Third Schedule of the Public Procurement Regulations 2018, which instructs that the minimum timeframe for notification period prior to the submission of bids using NCB is 14 days.</p> <p>Further and having regard to timeframes, we note that the procurement notice indicated a clarification end date of March 05, 2025, whilst Clause ITB 8.1 of the Bid Data Sheet specified that requests for clarification should be received by the procuring entity no later than 5 days before the deadline for submission of bids. In consequence, same was impractical as the publication and submission dates were one day before and after the publication and submission dates indicated by the CAD.</p> <p>2. ITB 4.2 stated for more information on the Public Procurement Commission's (PPC) classification, the website "http://www.gojep.gov.jm" should be visited, however, the correct PPC's URL is "http://ppc.gov.jm";</p>	The Commission recommended that the opportunity be aborted and retendered in the interest fairness and transparency. Additionally, the CAD was urged to expend the time and diligence to carefully draft and review tender documents before publishing same to ensure that they are void of inconsistencies and ambiguities which could negatively impact the outcome or otherwise prejudice a procurement undertaking.	Procurement cancelled and re-tendered utilizing single-source methodology

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
114				<p>3. ITB 9.1 advised a site visit will not be organized as part of the bidding procedure however, the competition details via GOJEP provided date/time for a scheduled site visit;4. Clause 17.5 of the BDS stated that the Incoterms 2025 edition applies to the procurement undertaking and further, Clause 17.6 outlines some of the terms prescribed in the current edition of the Incoterms published by the International Chamber of Commerce, however, there is no indication/specification of the intercom rule that this applicable to this procurement undertaking;5. ITB 35.1 specified that <i>"bid prices expressed in different currencies shall be converted to Jamaica Dollars and the date for the exchange rate shall be the same January 7, 2025"</i>; however, same is a historic date and cannot be applicable; and6. Whilst the Commission notes that a matrix with point allotment was included in the document, an explicit declaration as to the basis upon which a recommendation for award of contract will be made was not indicated. Please be reminded that recommendations for the award of contract can only be on the basis of lowest priced or the most advantageous.</p>		
115	March 11, 2025	NERHA	The Removal of Existing, Supply, Delivery, Installation and Commissioning of Boiler System Complete with Feeders (Chemical + Water) And Water Softener Inclusive Of 2 Years' Service	<p>1) Clause 20.1(a) of the Bid Data Sheet states that bidders are required <i>"...to demonstrate the financial, technical, and production capability to execute the contract,"</i> however, there's no indication of the type of documentation that is required to prove same nor is there any indication of how the aforementioned will incorporated in the</p>	<p>1) Recommend the Authority to clearly define the method by which suppliers should demonstrate their financial and production capability if same is required. 2) Recommend that the Authority corrects the exchange rate date, such that it aligns with the tender closing date</p>	Opportunity cancelled.

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
116			Contract at the St. Ann's Bay Regional Hospital, St. Ann Ref No: G/2024/011	evaluation process. 2) Clause 35.1 references an exchange rate date of "Thursday, March 11, 2025," which predates the tender closing date of March 13, 2025		
	March 13, 2025	Port Authority of Jamaica	Provision of Lift Station Maintenance Services for a Period of Three (3) Years Ref No: PAJ-MBFZ-1598-TA-017	The bid opening date/time was omitted from the Tender Document, though available via the Competition Details on GOJEP	For future procurements, we are recommending that Port Authority of Jamaica include this important information in their bidding document.	The PAJ accepted the recommendation.
117	March 14, 2025	Forestry Department	Supply and Deliver One (1) GNSS Device FD-FSTS-2025/12	1) Clause 4.8 of the Bid Data Sheet stated that for more information on the Public Procurement Commission's (PPC) classification, the website "http://www.ocg.gov.jm". 2) The document does not specify the PPC category(ies) for which bidders are required to be registered for participation in the procurement undertaking. Same is necessary for the progression of the process. 3) Clause 39.1 of the Bid Data Sheet was not revised from the default narrative to indicate the award criterion that will be applied to the procurement undertaking. Please note that the recommendation for award can only be on the basis or lowest priced OR most advantageous. The terms cannot be used concurrently or interchangeably as they represent two separate methods. 4) The Department did not specify a standstill period.	1) use the correct PPC's URL is "http://ppc.gov.jm" 2) recommended that the Department issues an addendum indicating the PPC category(ies) that will be accepted for this undertaking. 3) recommend that the Department issues and addendum explicitly stating the award criterion it deems most suitable for the undertaking. 4) recommended that the Department issues an Addendum advising bidders of the standstill period to be effected	The department responded saying they will be mindful for future procurements.

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
118	March 14, 2025	South East Regional Health Authority	Contracts Monitoring - Renovation and Expansion of the Princess Margaret Hospital Morgue	1. the site was locked with no observed security; and 2. the project appeared to have been halted as there was no ongoing activity. There were also no representatives on site from the contractor or the South East Regional Health Authority (SERHA).	Requisition letter was sent regarding the reasons for the lack of security on the site and to explain the reason for the pause, how the pause in the Works will affect the project schedule and how the time lost will be recovered.	Reduced level of activity was due to unforeseen site conditions and necessary design changes to improve the space's functionality. The lack of active security was due to the reduced level of activity.
119	March 18, 2025	Jamaica Constabulary Force	Supply, Delivery and Installation of Office Furniture and Appliances for the Frome Police Station and Little London Police Station in Westmoreland	1. Discrepancy with comparable estimate for furniture and appliance when compared to figures in tender opening record and evaluation report 2. The entity sub-divided a lot among multiple suppliers, in an attempt to attain the lowest cost per individual item 3. The evaluation report only states the awards in sub-lots but does not provide a breakdown of the items which will be provided by each Bidder.	Given that the last status report received was dated January 23, 2025, it may be impractical to make certain recommendations, depending on the stage of each procurement. Importantly, it has been noted that Frome Police Station was recently opened. The Jamaica Constabulary Force is therefore being urged to avoid sub-dividing or splitting lots for future procurements.	Adjustments were made to the comparable estimate to account for inflation as market research was conducted some months back
120	March 20, 2025	Edna Manley College of the Visual and Performing Arts	Provision of Pest Control Service	1. The tender document used by the College does not resemble any of the available SBDs of the MOFPS's website. 2. Edna Manley College of the Visual and Performing Arts' (the College) tender document stated that, <i>"The award will be given to the bidder offering the most advantageous quote and that meets the required standards of technical and price"</i> , however, no matrix or scoring mechanism was provided that will determine the successful Bidder. 3. Evaluation Section 1 a. Evaluation of Quotations, states <i>"Quotations determined to be substantially responsive to the specifications will be evaluated by comparison of the price and quality"</i> , however, no specifications were	a. Issue an addendum revising the current Tender Document utilizing the most applicable GOJ Standard Bidding Document. The College is being urged to review the SBD for Non-Consulting Service, Annex NCS1 Procurement of Non-Consulting Services (Request for Proposal RFQ) which can be found on the MFPS's website; and b. Develop the evaluation criteria that will be used for this procurement which will guide the award criteria.	Opportunity was cancelled based on our observations. The Entity stated that they will request further guidance from the Ministry of Finance and the Public Service regarding the use of Gojep.

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No.	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
121				evidenced in the tender document 4. The College is requesting Bidders to provide client reference forms, however, there is no indication of how these forms will aid in the evaluation of the Bids received.		
	March 25, 2025	Jamaica Bauxite Mining Limited	Supply, Delivery, Installation and Commissioning of Spring Water Treatment and Bottling Equipment Ref No: JBML ICB– 2025-03-10 PRO/03	ITB 20.1 stated <i>'the amount of the bid security shall be 0.5% of the bidder's bid price'</i> . Reference is made to GOJ's Handbook of Public Sector Procurement Procedures (Volume Two), which recommends that 'the Bid Security be a fixed sum, set within the range of 0.05% to 2% of the comparative estimate'. Also, the form that the bid security shall take was not indicated.	That the entity issues an addendum to specify the fixed sum of the required bid security and the form/s acceptable to the entity.	Addendum issued
	March 25, 2025	Montego Bay Convention Centre	The Supply and Installation of Digital Signage	1. Incorrect URL provided for PPC website 2. Discrepancy between the dates listed for the bid submission deadline	Issue an addendum, advising stakeholders of the correct date	Entity noted the discrepancies highlighted and will review carefully in the future

Appendix 3 - Areas of Impact – Licences and Asset Divestment/ Acquisition

During the course of the Financial Year, the Division, as a part of its core functions, provided the following recommendations to Public Bodies in respect of the Divestment and Licensing process:

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
1	June 3, 2024	Development Bank of Jamaica	Jamaica Mortgage Bank Privatization Transaction – Shares	At the tender opening attended on April 30, 2024 it was observed that the evaluation criteria were subjective and would require that the criteria be broken down further for a more objective scoring. The DBJ had advised that a breakdown of the criteria was being developed which could be provided to Evaluators of the offers received	The DBJ was reminded to minimize subjectivity in the evaluation process and that bidders must be made aware of all criteria by which their bids /offers would be evaluated. The DBJ was requested to provide a copy of the breakdown of the evaluation criteria to be used and to provide evidence of the communication of the breakdown of the scores to all bidders	Recommendation noted by the Public Body. DBJ provided the breakdown of the evaluation criteria used to evaluate the received bid.
2	June 11, 2024	Sugar Industry Authority	Lease of Property – Kendal Road, Battersea, Mandeville, Manchester	It was noted that the evaluation criteria in the request for offer did not indicate objectively how the applicant would be scored.	It was recommended that for future offers the referenced evaluation criteria be divided into sub-criteria to properly assess the main items. The SIA was also reminded that the sub-criteria and their weighting determines the outcome of the evaluation. The evaluation criteria, sub-criteria and associated points and the rating system forms an arithmetic model to assess the technical merit of the offer that ensures a higher level of accuracy in the evaluation process.	The SIA stated that it had taken note of the recommendation regarding the allocation regarding to the sub criteria to be disclosed in future request for offers. Further the entity stated that it would endeavor to strive for transparency and increased efficiency in the Land Divestment process.
3	August 13, 2024	Airports Authority of Jamaica	Request for Proposals for the Establishment of Fixed Base Operator (FBO) services at the Ian Fleming International Airport (AIFIA), Boscobel, St. Mary	a)The Evaluation Report was neither signed nor dated. b)The bid was evaluated by two persons	a) The Evaluation Report is to be revised to include the following: 1. The date; 2. The name of each evaluation Committee Member; 3. The signature of each Evaluation Committee Member; To ensure fairness and objectivity, members of the evaluation team should not have any direct or indirect undeclared financial interest in the matter being evaluated or any personal relationship with bidders/applicants. Therefore, a statement declaring any pecuniary and personal interest should also be included in the Evaluation Report. b) Whilst an Evaluation committee needs at least two members, in accordance to best practice, we recommend an odd number for example 3 or 5 as two members only	Awaiting response from the entity

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No	Date of Recommendation	Public Body/Entity	Project Title	Observation	Recommendation	Action Taken by PB
4					does not indicate a high level of objectivity	
	September 25, 2024	Spectrum Management Authority	Call for applications for Spectrum Licences in the 600 MHz Band initial advert Sunday August 25, 2024 with closing date for tender September 20, 2024	The RFP in respect of the Gleaner advertisement dated Sunday August 25, 2024 could not be located on the website. Whilst the advertisement reflected "SMA-IM-600-2024-05-29" this was an apparent error as this was for the previous application period and the RFP entitled "SMA-IM-600-08-26" is the correct application.	Whilst the Request for Proposal takes precedence over advertisements to ensure fairness and objectivity accurate information is needed in all advertised media, as such it was recommended to the entity to increase review of information to be disseminated to the public thoroughly	Recommendation Noted by the Public body.
5	September 26, 2024	Clarendon Municipal Corporation	Lease of Property – Rock River, Clarendon	We note that the re-advertisement published in the Jamaica Observer on August 30, 2024, did not include information on whether the official opening for offers/proposals would be public or not, as per the PFPM, section 5.2.3, item 1.	<p>It is recommended that the referenced information be included for future advertisements of this nature.</p> <p>We also take the time to remind the Clarendon Municipal Corporation that in an effort to maintain consistency of the evaluation reports prepared and submitted by Public Bodies, the format of the reports should be amended to include the following:</p> <ol style="list-style-type: none"> 1. The medium utilized for advertisement of the property; 2. The number of bids received; 3. The compliance of the bidder/applicant with the requirements; 4. The mode of divestment; 5. The evaluation criteria utilized; 6. The score sheet, indicating the breakdown of scores assigned to each bidder/applicant; 7. The award criterion; and 8. The recommendation for award of contract. 	The entity stated the IC's recommendations on the requirements for the advertisement and has adjusted the evaluation report as stipulated.
6	September 30, 2024	Urban Development Corporation	Request for Proposal- Design, Build, Lease Three (3) Anchor Shop Spaces, Closed Harbour Beach Park, Montego Bay, St. James	Based on the review of the corporation's commercial Evaluation, it was noted that the Methodology for the technical evaluation does not support the selection criterion. Whereas the application of the methodology for the technical evaluation would result in a maximum attainable score of 100 points, the selection criterion indicated that the bid offering the highest offer and at a minimum demonstrating	It is recommended that for future tender opportunities, the UDC should exercise due diligence in developing its evaluation criteria and ensure that it fully supports the selection criterion communicated to bidders.	No response required

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No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
7				an overall quality of proposal would be awarded the contract. To obtain synergy between the selection criteria and the evaluation methodology bidders should have been required to obtain a minimum score also on the technical evaluation and having attained such, the bidder offering the highest offer selected.		
	October 4, 2024	NEPA	Application for Environmental Permit by United Estates Limited for the Construction and Operation of facilities for Food Processing - Bog Walk, St. Catherine	Apparent irregularities were noted on a site visit within the vicinity of Bog Walk, St. Catherine. Apparent effluent running from the Serge Island Dairies Plant into an adjoining drain on Trade Winds Citrus Limited's premises; and (b) A white substance flowing under what was referred to as the "stinky bridge" seemingly heading in the direction of the Rio Cobre as indicated by NEPA and EAJ personnel on site	Requested detailed report of any and all steps taken by NEPA and/or any third party contracted by NEPA regarding the apparent irregularities identified	Matter was escalated and a NDA entered into between TWCL & NEPA causing an out of court settlement. Notice was served on the chairman of NRCA which to date no response has been provided.
8	October 8, 2024	Ministry of Economic Growth and Job Creation	Land Divestment matters (Multiple files)	Deviations in the advertisement.	<p>The entity is to be guided by the following:</p> <ul style="list-style-type: none"> a. PFPM section 5.2 (The Process) which highlights certain commonalities in the process for all the modes of divestment. b. Section 5.2.1, item 2 which states that advertisements should, as far as possible include statements to the effect that "the Commissioner of Lands is not bound to accept the highest or any offer." <p>Based on the foregoing, it is recommended that future advertisements should therefore include a similar statement for example "The Minister of Housing is not bound to accept the highest or any offer."</p>	No response required
9	October 28, 2024	NEPA	Environmental Permit Application by China Harbour Engineering Company	Apparent Irregularities were identified during a site visit of the location. The apparent irregularities noted on site were as follows:	NEPA to submit a detailed report of any and all steps taken by NEPA and/or any third-party contracted by NEPA regarding the apparent irregularities identified prior to include 1. irregularities identified;	Irregularities identified were documented and served as a Site Warning Notice to the Site Supervisor.

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No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
			Limited (CHEC) for the Construction of Site Office and Housing Project at Wheelerfield, St Thomas	1. Construction of temporary campsite facilities, without the approved permits; 2. Construction of Hydrocarbon Storage Facility without the requisite permit; 3. Construction of Batching plant without the requisite permit; Several apparent minor oil spills within the vicinity of the hydrocarbon plants; 3. Improper erection of Bunds which had pipes leading from the inside to the open soil which served as a mechanism to leak liquid substances from the bund to outside; 4. Improper treatment of polluted soil; and 5. Improper disposal / accumulation of Solid Waste	2. Confirmation of any and all notices / other instruments served on China Harbour Engineering Company (CHEC); 3. Details on the appropriate remedy to be executed by CHEC for each irregularity and the proposed timelines; 4) Regularization actions taken by CHEC subsequent to the serving of notices/other	
10	November 11, 2024	Urban Development Corporation	Request for Proposal – Design, Build, Lease Three (3) Anchor Shop Spaces, Closed Harbour Beach Park Montego Bay St. James	Bids were to be evaluated in two phases, Phase 1 a Commercial Evaluation and Phase 2 a Technical Evaluation. A minimum score was not specified for the technical evaluation The Selection Criteria is applied subsequent to the Technical Evaluation and indicated that the bidder making the highest offer and at a minimum demonstrating an overall quality of proposal would be awarded the contract. The Commission noted that the technical evaluation does not support the selection criteria	To obtain synergy between the selection criteria and the evaluation methodology the bidders should have been required to obtain a Minimum, score also on the technical evaluation and, having attained such, the bidder offering the highest bid sum selected. It was also recommended that for future tender opportunities, the UDC should exercise due diligence in developing its evaluation criteria and ensure that it fully supports the selection criterion communicated to bidders.	Recommendation noted by public body.
11	November 19, 2024	Urban Development Corporation	Request for offer to Lease Parking Areas 1 – 4 Land part of Norman Manley Boulevard, Negril Hanover	1. Section 3, item 3Q) stated that Companies must submit a valid/current copy of their Certificate of Incorporation issued by the Office of the Registrar of Companies	1. The Commission recommended that the UDC also request a current letter of good standing from the applicants to confirm that the company is compliant with the Companies Act and has satisfied all filing and statutory requirements for the current year.	Recommendation noted by public body.

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No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
				<p>Notwithstanding, the Certificate of Incorporation does not indicate an expiry date.</p> <p>2. A request was made in section 3 iii(a) for the submission of an Audited or Unaudited Financial Statement. The Commission noted that the specific year(s) required were not indicated,</p> <p>3. Also, reference was made to items 2 and 3 of the evaluation criteria outlined in section 10 of the Information Memorandum which pertain to the proposed or intended use of the property and the proximity of proponent from land. Section 3, however, of the Information Memorandum does not specify the documentary proof i.e. business proposal/plan/drawings required to validate or to demonstrate the applicant's capacity to fulfil the requirements of the referenced criteria</p> <p>3. We note that section 11 of the information memorandum states that the award criteria align with section 2.2.7 of the Government of Jamaica's Policy Framework and Procedures Manual for the Divestment of Government-Owned Lands which indicates that the Government shall seek to optimize income from the divestment process. We would however, like to point out that the referenced description emphasizes the</p>	<p>2. To eliminate ambiguity and to better ascertain the applicant's financial position, it is recommended that the most recent financial statements be requested such as the last two years or the specific year</p> <p>3. It is recommended that the award criteria be amended to indicate a clear and specific award criterion.</p>	

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No	Date of Recommendation	Public Body/Entity	Project Title	Observation	Recommendation	Action Taken by PB
12				economic benefits to the Government without clearly outlining the criteria for selecting the applicant. Based on the evaluation criteria indicated in the Information Memorandum the award criteria would appear to be the highest evaluated bid.		
	November 19, 2024	Urban Development Corporation	Lease of property - Lots 61 – 65 Harbour Street, Kingston	<p>1. Section 3, item 3Q) stated that Companies must submit a valid/current copy of their Certificate of Incorporation issued by the Office of the Registrar of Companies</p> <p>Notwithstanding, the Certificate of Incorporation does not indicate an expiry date.</p> <p>2. A request was made in section 3 iii(a) for the submission of an Audited or Unaudited Financial Statement. The Commission noted that the specific year(s) required were not indicated,</p> <p>3. Also, reference was made to item 2 and 3 of the evaluation criteria outlined in section 10 of the Information Memorandum which pertain to the proposed or intended use of the property and the proximity of proponent from land. Section 3, however, of the Information Memorandum does not specify the documentary proof i.e. business proposal/plan/drawings required to validate or to demonstrate the applicant's capacity to fulfil the requirements</p>	<p>1. The Commission recommended that the UDC also request a current letter of good standing from the applicants to confirm that the company is compliant with the Companies Act and has satisfied all filing and statutory requirements for the current year.</p> <p>2. To eliminate ambiguity and to better ascertain the applicant's financial position, it is recommended that the most recent financial statements be requested such as the last two years or the specific year</p> <p>3. It is recommended that the award criteria be amended to indicate a clear and specific award criterion.</p>	

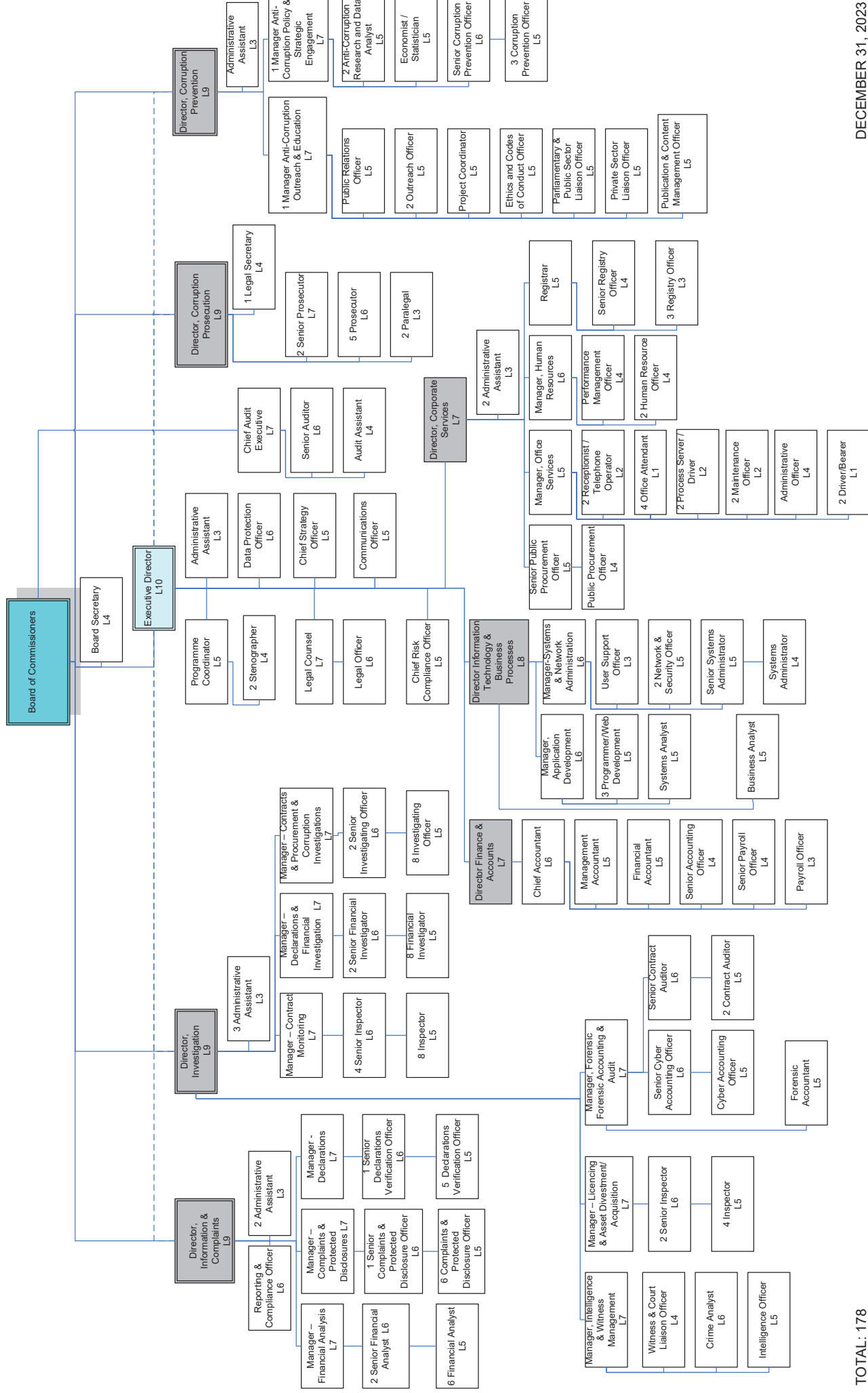
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No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
13				<p>of the referenced criteria</p> <p>3. We note that section 11 of the information memorandum states that the award criteria align with section 2.2.7 of the Government of Jamaica's Policy Framework and Procedures Manual for the Divestment of Government-Owned Lands (2015) which indicates that the Government shall seek to optimize income from the divestment process. We would however, like to point out that the referenced description emphasizes the economic benefits to the Government without clearly outlining the criteria for selecting the applicant. Based on the evaluation criteria indicated in the Information Memorandum the award criteria would appear to be the highest evaluated bid.</p>		
	March 3, 2025	UDC	RFOP: Lands Part of Success Lot 5 & Sections 18A St. James	<p>We note that criterion 3 of the evaluation criteria indicates that previously submitted applications to purchase the property would be allotted a weighting of 15pts. Furthermore, we note the statement "evidence of submission of previous application to be verified with internal records." We believe the current wording may present potential ambiguities.</p>	<p>The IMD should explicitly state that prior unsolicited applications will be considered as part of the evaluation process. This aligns with the Policy Framework & Procedures Manual for the Divestment of Government Owned Lands (2015), section 5.13 on page 17 which states that, "special weights shall be allotted to applicants who had identified the land and brought it to the attention of the Commissioner."</p> <p>IC recommended the entity to issue a corresponding addendum to address the identified concern prior to the close of tender.</p>	Changes were made to the tender document.
	March 7, 2025	KSAMC	Permit for construction of Housing projects of 66 Units at 8 Dillsbury	Irregularities identified on site in relation to: The construction or intended construction of the identified developments; and	Submission of various documentation.	Response received on June 4, 2025. KSAMC served a notice to the developer to immediately cease all construction activities

INTEGRITY COMMISSION

No	Date of Recommendation	Public Body/ Entity	Project Title	Observation	Recommendation	Action Taken by PB
15			Avenue and 82 Units at 24 Dillsbury Avenue, Kingston 6	The failure of the applicant to conduct works per conditions subject to which the building permits were issued.		pending the relevant review.
	March 13, 2025	UDC	RFP – Operators for the Logo Shops/Kiosks Concession; Operators for Adventure Activities; Operators for Water Based Activities	<p>We note that the IMD at Evaluation Criteria (Rating Proposal for Proposed Business Concept) does not provide specific guidelines or a rubric to define the expectations for bidders or applicants regarding how they will be evaluated on each sub-criterion.</p> <p>b. Reference is made to item 7, bullet point #1 of the evaluation criteria which indicate the submission of a financial statement but does not specify whether these financial statements are to be audited or unaudited.</p> <p>4. Reference is made to Appendix 11 – required document checklist in the IMD which specifies that bidders or applicants must submit a Tax Compliance Certificate (TCC) or Taxpayer Registration Number (TRN). However, we observed that the term “valid” was omitted from the request for the TCC. In accordance with current regulations a bidder is only considered eligible if they possess a valid TCC.</p>	<p>To eliminate any ambiguity in the evaluation process and to ensure that no bidder has an unfair advantage over another it is essential to explicitly state the required type of financial statement in the (IMD). Additionally, given that a weighting is assigned to this criterion, we recommend that an audited financial statement be requested</p> <p>It is essential for future IMDs to include the word "valid" preceding the request for a Tax Compliance Certificate in order to avoid any ambiguity.</p>	Public body indicated that the recommendation would be implemented.

INTEGRITY COMMISSION - APPROVED ORGANIZATIONAL STRUCTURE



Appendix 5 – Audited Financial Statements

INTEGRITY COMMISSION

FINANCIAL STATEMENTS
MARCH 31, 2025

INTEGRITY COMMISSION

**FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2025**

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Independent Auditor's Report

To the members of Integrity Commission

Report on the Audit of the Financial Statements

Opinion

We have audited the accompanying financial statements of the Integrity Commission (the "Commission"), which comprise the statement of financial position as at March 31, 2025, the statement of comprehensive income, the statement of changes in reserves, the statement of cash flows for the year then ended and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements give a true and fair view of the financial position of the Commission as at March 31, 2025, and of its financial performance and cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRS).

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements section of our report*. We are independent of the Commission in accordance with the International Ethics Standards Board for Accountants Code of Ethics for Professional Accountants including International Independence Standards (IESBA Code) and we have fulfilled our other ethical responsibilities in accordance with the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Emphasis of Matter

We draw attention to the net deficit reported for the year of \$61.176 million and the accumulated deficit at the end of the reporting period of \$102.999 million and to Note 18(b) to the financial statements reconciling the reported deficit to the surplus before depreciation, amortization and finance charges. Our opinion is not modified in respect of this matter.

Responsibilities of management and those charged with governance for the Financial Statements

Management is responsible for the preparation of financial statements that give a true and fair view in accordance with IFRS and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Commission's ability to continue as a going concern, disclosing as applicable, matters related to going concern and using the going concern basis of accounting unless management intends to liquidate the Commission or to cease operations, or has no realistic alternative but to do so.

The Commissioners are responsible for overseeing the Commission's financial reporting process.

Independent Auditor's Report (cont'd)

To the members of Integrity Commission

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Commission's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Commission's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Commission to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that presents a true and fair view.

We communicated with management regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.



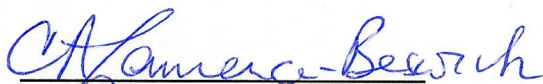
Chartered Accountants
June 25, 2025


INTEGRITY COMMISSION


STATEMENT OF FINANCIAL POSITION AS AT MARCH 31, 2025

	Note	2025 \$	2024 \$
ASSETS			
Non-current Assets			
Plant and equipment	9	232,406,740	264,684,933
Right-of-use assets	15	434,157,168	525,360,275
Intangible assets	10	9,331,877	27,818,505
		<u>675,895,785</u>	<u>817,863,713</u>
Current Assets			
Loans receivable	11	625,250	840,864
Prepayments and deposits	12	54,553,916	35,674,162
Cash and bank balances	13	3,645,919	36,265,936
		<u>58,825,085</u>	<u>72,780,962</u>
TOTAL ASSETS		<u>734,720,870</u>	<u>890,644,675</u>
RESERVES AND LIABILITIES			
Reserves			
Transferred assets	14	-	-
Accumulated deficit		<u>(102,999,692)</u>	<u>(41,823,463)</u>
		<u>(102,999,692)</u>	<u>(41,823,463)</u>
Non-current Liabilities			
Lease liabilities	15	465,211,675	551,671,143
Deferred income	16	237,402,088	269,195,445
		<u>702,613,763</u>	<u>820,866,588</u>
Current Liabilities			
Current portion of lease liabilities	15	81,102,366	65,863,200
Payables and accruals	17	54,004,433	45,738,350
		<u>135,106,799</u>	<u>111,601,550</u>
TOTAL RESERVES AND LIABILITIES		<u>734,720,870</u>	<u>890,644,675</u>

Approved, on behalf of the Commission on June 25, 2025, and signed on its behalf by:


Chairman


Commissioner


Executive Director (Acting)

The accompanying notes form an integral part of the financial statements.

INTEGRITY COMMISSION

STATEMENT OF COMPREHENSIVE INCOME YEAR ENDED MARCH 31, 2025

	Note	2025 \$	2024 \$
Subvention	4	1,544,470,627	1,320,156,660
Grant income	7	<u>27,306,738</u>	<u>14,673,665</u>
		1,571,777,365	1,334,830,325
Administrative and general expenses	5	(1,442,903,094)	(1,201,019,112)
Direct expenses funded by Grant	7	(60,661,124)	(34,327,620)
Interest income		<u>31,770</u>	<u>59,217</u>
Surplus before depreciation, amortisation & finance charges		68,244,917	99,542,810
Depreciation and amortization of plant & equipment	9,10	(110,505,508)	(100,843,373)
Depreciation of right-of-use assets	15	(91,203,107)	(91,239,741)
Interest expense on long term lease	8,15	(38,726,421)	(43,196,773)
Foreign currency gain (loss)		508,382	(2,422,541)
Deferred income amortised	16	<u>110,505,508</u>	<u>100,964,694</u>
Net deficit for the year, being total comprehensive loss	18	<u>(61,176,229)</u>	<u>(37,194,924)</u>

The accompanying notes form an integral part of the financial statements.

INTEGRITY COMMISSION

STATEMENT OF CHANGES IN RESERVES YEAR ENDED MARCH 31, 2025

	Accumulated Surplus (Deficit) \$
Balance at April 1, 2023	2,188,123
Net deficit, being total comprehensive loss for the year	<u>(37,194,924)</u> (35,006,801)
Funds transfer to the Accountant General (Note 11)	<u>(6,816,662)</u>
Balance at March 31, 2024	(41,823,463)
Net deficit, being total comprehensive loss for the year	<u>(61,176,229)</u>
Balance at March 31, 2025	<u><u>(102,999,692)</u></u>

The accompanying notes form an integral part of the financial statements.

INTEGRITY COMMISSION

STATEMENT OF CASH FLOWS YEAR ENDED MARCH 31, 2025

		2025 \$	2024 \$
CASH FLOWS FROM OPERATING ACTIVITIES	Note		
Net deficit for the year		(61,176,229)	(37,194,924)
Adjustments for items not affecting cash resources:			
Lease interest expense	15	38,726,421	43,196,773
Foreign exchange (gain) loss		(508,382)	2,422,541
Interest income		(31,770)	(59,217)
Depreciation charge on right-of-use asset	15	91,203,107	91,239,741
Depreciation on plant and equipment	9	86,305,930	79,721,249
Amortisation charge on intangible assets	10	24,199,578	21,122,124
Net plant and equipment adjustment		-	(246,775)
Deferred income amortised	16	(110,505,508)	(100,964,694)
		68,213,084	99,236,818
Decrease/(Increase) in operating assets:			
Loans receivables		214,729	(424,678)
Prepayments and deposits		(18,879,754)	11,259,142
Increase/(Decrease) in operating liabilities:			
Payables and accruals		8,266,083	(6,472,992)
Due to consolidated fund		-	8,772,041)
		57,814,612	94,826,249
Interest received		32,655	56,347
Net cash provided by operating activities		57,846,860	94,882,596
CASH FLOWS FROM INVESTING ACTIVITIES			
Acquisition of plant and equipment	9	(54,027,737)	(53,164,974)
Acquisition of intangible asset	10	(5,712,950)	(21,892,259)
Net cash used in investing activities		(59,740,687)	(75,057,233)
CASH FLOWS FROM FINANCING ACTIVITIES			
Lease payments	15	(109,946,723)	(102,175,167)
Payment to The Accountant General		-	(6,816,662)
Deferred income	16	78,712,151	62,301,193
Net cash used in financing activities		(31,234,572)	(46,690,636)
Decrease in cash and cash equivalents		(33,128,399)	(26,865,273)
Cash and cash equivalents at beginning of year		36,265,936	65,553,750
Effect of exchange rate movement on cash and cash equivalents		508,382	(2,422,541)
CASH AND CASH EQUIVALENTS AT END OF YEAR	13	3,645,919	36,265,936

The accompanying notes form an integral part of the financial statements.

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS YEAR ENDED MARCH 31, 2025

1. IDENTIFICATION

The Integrity Commission (the "Commission") was established under the Integrity Commission Act (2017) (the "Act"). The Commission is domiciled in Jamaica.

Among the objects and functions of the Commission are:

- (a) To promote and strengthen measures for the prevention, detection, investigation and prosecution of acts of corruption;
- (b) To ensure that government contracts are awarded, varied, renewed or terminated impartially, on merit and in a financially prudent manner;
- (c) To examine the practices and procedures of public bodies and make recommendations, in relation to the revision of those practices and procedures, which in the opinion of the Commission may reduce the likelihood or the occurrence of acts of corruption;
- (d) To prepare codes of conduct and other advisory material relating to corruption and guide public bodies in respect of matters within the purview of this Act;
- (e) To monitor current legislative and administrative practices in the fight against corruption;
- (f) To adopt and strengthen mechanisms for educating the public in matters relating to corruption; and
- (g) To compile and publish statistics relating to the investigation, prosecution and conviction of offences relating to acts of corruption.

2. STATEMENT OF COMPLIANCE AND BASIS OF PREPARATION

2.1 Statement of Compliance

The Commission's financial statements have been prepared in accordance and comply with International Financial Reporting Standards (IFRS) and their interpretations issued by the International Accounting Standards Board.

The financial statements have been prepared under the historical cost basis and are expressed in Jamaican dollars, unless otherwise indicated.

The preparation of financial statements in conformity with IFRS requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities as at the date of the financial statements and the reported amounts of revenues and expenses for the year then ended. Actual results could differ from these estimates.

The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period in which the estimate is revised, if the revision affects only that period, or in the period of revision and future periods, if the revision affects both current and future periods.

There are no significant assumptions and judgements applied in these financial statements that carry a risk of material adjustment in the next financial year.

2. STATEMENT OF COMPLIANCE AND BASIS OF PREPARATION (CONT'D)

2.2 Amendments to IFRS that are mandatorily effective for the current year

In the current year the Commission has applied a number of amendments to IFRS issued by the International Accounting Standards Board (IASB) that are mandatorily effective for the accounting period that begins on or after 1 January 2024.

The application of these amendments has not had any impact on the amounts reported or the presentation and disclosures in these financial statements but may impact the accounting for future transactions and arrangements.

		Effective for annual periods beginning on or after
<u>New Standard</u>		
IFRS S1	General Requirements for Disclosure of Sustainability-related Financial Information	January 1, 2024
IFRS S2	Climate-related Disclosures	January 1, 2024
<u>Amendments to Standards</u>		
IAS 1	<i>Presentation of Financial Statements</i>	
	- Classification of liabilities as Current or Non-current	January 1, 2024
	- Amendment regarding the classification of debts with covenants	January 1, 2024
IAS 12	<i>Income Taxes</i>	Immediately (from May 2023)
	Amendments in relation to implementation of Pillar two rules published by OECD	
IFRS 16	<i>Leases</i>	
	Amendment to clarify how a seller-lessee subsequently measures sale and leaseback transactions	January 1, 2024
IFRS 7 and IAS 7	<i>Financial Instruments: Disclosure; Statement of Cash Flows</i>	
	Amendments regarding supplier finance arrangements	January 1, 2024

Amendments to IAS 1: *Classification of Liabilities as Current or Non-current* and *Non-Current Liabilities with Covenants*

The amendments specify the requirements for classifying liabilities as current or non-current and clarifies as follows:

- What is meant by a right to defer settlement
- That a right to defer must exist at the end of the reporting period
- That classification is unaffected by the likelihood that an entity will exercise its deferral right
- That only if an embedded derivative in a convertible liability is itself an equity instrument would the terms of a liability not impact its classification
- Disclosures

2. STATEMENT OF COMPLIANCE AND BASIS OF PREPARATION (CONT'D)

2.2 Amendments to IFRS that are mandatorily effective for the current year (Cont'd)

Right to defer settlement

An entity's right to defer settlement of a liability is subject to the entity complying with the required covenants only at a date subsequent to the reporting period ("future covenants"). The entity has a right to defer settlement of the liability even if it does not comply with those covenants at the end of the reporting period. The requirements apply only to liabilities arising from loan arrangements.

The amendment did not have any impact on the Commission's financial statements.

Amendments to IFRS 16 - Lease Liability in a Sale and Leaseback

The amendment to IFRS 16 specifies the requirements that a seller-lessee uses in measuring the lease liability arising in a sale and leaseback transaction, to ensure the seller-lessee does not recognise any amount of the gain or loss that relates to the right of use it retains. After the commencement date in a sale and leaseback transaction, the seller-lessee applies paragraphs 29 to 35 of IFRS 16 to the right-of-use asset arising from the leaseback and paragraphs 36 to 46 of IFRS 16 to the lease liability arising from the leaseback. In applying paragraphs 36 to 46, the seller-lessee determines 'lease payments' or 'revised lease payments' in such a way that the seller-lessee would not recognise any amount of the gain or loss that relates to the right of use retained by the seller-lessee.

Applying these requirements does not prevent the seller-lessee from recognising, in profit or loss, any gain or loss relating to the partial or full termination of a lease, as required by paragraph 46(a) of IFRS 16.

The amendment did not have any impact on the Commission's financial statements.

Amendments to IFRS 7 and IAS 7: Disclosures – Supplier Finance Arrangements

The amendments assist users of the financial statements to assess the effect of these arrangements on the entity's liabilities, cash flows and exposure to liquidity risks.

Characteristics of the supplier arrangements

One or more finance providers pay amounts an entity owes to its suppliers. The entity agrees to settle these amounts with the finance providers according to the contractual arrangement with them, which may be at terms and conditions at the same date or at later dates than that on which the finance providers pay the entity's suppliers.

Disclosure requirements

New disclosures are required to provide information about the impact of supplier finance arrangements on liabilities and cash flows, including terms and conditions of those arrangements, quantitative information on liabilities related to those arrangements as at the beginning and end of the reporting period and the type and effect of non-cash changes in the carrying amounts of those arrangements. The information on those arrangements is required to be aggregated unless the individual arrangements have dissimilar or unique terms and conditions. IFRS 7 requires quantitative liquidity risk disclosures of financial liabilities. In that context, supplier finance arrangements are included as an example of other factors that might be relevant to disclose.

There are transition reliefs regarding comparative and quantitative information as at the beginning of the annual reporting period.

The amendment did not have any impact on the Commission's financial statements.

2. STATEMENT OF COMPLIANCE AND BASIS OF PREPARATION (CONT'D)

2.2 Amendments to IFRS that are mandatorily effective for the current year (Cont'd)

Amendments to IAS 12 – Income Taxes

In May 2023, the Board issued amendments to IAS 12 Income Taxes, which introduce a mandatory exception in IAS 12 from recognising and disclosing deferred tax assets and liabilities related to Pillar Two income taxes.

The Commission is not subjected to Pillar Two Model Rules published by the OECD either enacted or substantively enacted and therefore the amendments do not apply.

IFRS S1: General Requirements for Disclosure of Sustainability-related financial information

IFRS S1 sets out overall requirements with the objective to require an entity to disclose information about its sustainability-related risks and opportunities that is useful to the primary users of general purpose financial reports in making decisions relating to providing resources to the entity. It applies to all entities regardless of their accounting principles and practices.

IFRS S2: Climate-related Disclosures

IFRS S2 sets out the requirements for identifying, measuring and disclosing information about climate-related risks and opportunities to which the entity is exposed that is useful to the primary users of general purpose financial reports in making informed decisions regarding resource allocation to the entity. These are climate-related risks and opportunities that could reasonably be expected to affect the entity's cash flows. Climate-related financial disclosures cover matters of governance, strategy, risk management and metrics and targets.

Mandatory application of the above IFRS S1 and S2 Sustainability Disclosure Standards will depend on each jurisdiction's endorsement or regulatory processes. Earlier application of the Standards is permitted provided an entity applies both Standards at the same time and an entity discloses that it has applied the Standard early.

The Commission has not yet assessed the status of jurisdictional and regulatory processes in Jamaica in determining the application of these standards to the Commission.

2. STATEMENT OF COMPLIANCE AND BASIS OF PREPARATION (CONT'D)

2.3 New and revised IFRS in issue but not yet effective

At the date of authorisation of these financial statements, the following Standards, Interpretations and amendments thereto were in issue but were not effective or early adopted for the financial period being reported on:

		Effective for annual periods <u>beginning on or after</u>
<u>New Standards</u>		
IFRS 18	Presentation and Disclosures in Financial statements	January 1, 2027
IFRS 19	Subsidiaries without Public Accountability: Disclosures	January 1, 2027
<u>Revised Standards</u>		
IFRS 10 and IAS 28	Sale or Contribution of Assets between an Investor and its Associate or Joint Venture - Amendments to IFRS 10 and IAS 28	Effective date postponed indefinitely pending outcome of project on equity method of accounting
IAS 21	<i>The effect of Changes in Foreign Exchange Rates</i> Amendment on 'Lack of Exchangeability', providing guidance to specify when a currency is exchangeable and how to determine the exchange rate when it is not.	January 1, 2025
IFRS 7 and IFRS 9	<i>Financial Instruments: Disclosures and Financial Instruments</i> - Amendments regarding the classification and measurement of financial instruments	January 1, 2026
	- Power Purchase Agreements: Contracts Referencing Nature-dependent Electricity	January 1, 2026
IAS 7 Statement of Cash Flows	Amendments requiring the use of the operating profit subtotal as defined in IFRS 18 as the starting point for the indirect method of reporting cash flows from operating activities. Additionally, the presentation alternatives for cash flows related to interest and dividends paid and received will be removed.	When IFRS 18 is applied, effectively for annual periods beginning on or after January 1, 2027
IFRS 1, 7, 9, 10, IAS 7	Annual Improvements to IFRS Accounting Standards – Volume 11	January 1, 2026

2. STATEMENT OF COMPLIANCE AND BASIS OF PREPARATION (CONT'D)

2.3 New and revised IFRS in issue but not yet effective (cont'd)

New and Revised Standards and Interpretations in issue not yet effective that are relevant

The Commission has assessed the impact of all the new and revised Standards and Interpretations in issue not yet effective and has concluded that the following are relevant to the operations of the Commission:

- **IFRS 18: Presentation and Disclosures in Financial Statements (New Standard)**

The objective of the standard is to set out requirements for the presentation and disclosure of information in general purpose financial statements to help ensure they provide relevant information that faithfully represents an entity's assets, liabilities, equity, income and expenses that is useful to users of financial statements in assessing the prospects for future net cash inflows to the entity and in assessing management's stewardship of the entity's economic resources.

IFRS 18 identifies what a complete set of financial statements comprises and identifies this as 'primary financial statements'.

Statement of profit or loss

The standard requires that an entity classify all income and expenses within its statement of profit and loss into one of five categories: operating, investing, financing, income taxes and discontinued operations, the first three of which are new. This is complemented by the requirement to present subtotals and totals for 'operating profit or loss', 'profit or loss before financing and income taxes' and 'profit or loss'.

Main business activities

For purpose of classification in the three new categories, an entity will need to assess whether it has a 'specified main business activity' of investing in assets or providing financing to customers, as specific classification requirements apply to such entities. Judgement is required in determining the fact and circumstances relevant to a specified main business activity as an entity may have more than one business activity.

Investing Category

This category will generally include income and expenses from investments in associates, joint ventures and unconsolidated subsidiaries, cash and cash equivalents and other assets, if they generate a return individually and largely independently of the entity's other resources.

Financing category

For an entity that does not provide financing to customers as a specified main business activity, the financing category comprises income and expenses from liabilities arising from transactions that involve only the raising of finance, for example, debentures, loans, notes, bonds and mortgages. It would also include interest income and expenses and the effects of changes in interest rates from liabilities arising from transactions that do not involve only the raising of finance, for example, payables for goods or services, lease liabilities and defined benefit pension liabilities, but only if the entity identifies those amounts when applying another IFRS accounting standard to other liabilities that do not involve only the raising of finance.

Those entities that provide financing to customers as a main business activity will classify in the operating category income and expenses from liabilities that arise from transactions that involve only the raising of finance related to the provision of financing to customers and make an accounting policy choice to classify in the operating category or financing category income and expenses from liabilities that arise from transactions that involve only the raising of finance not related to the provision of financing to customers.

2. STATEMENT OF COMPLIANCE AND BASIS OF PREPARATION (CONT'D)

2.3 New and revised IFRS in issue but not yet effective (cont'd)

Operating category

This category is intended to capture income and expenses from the entity's main business activities. IFRS 18 describes it as a residual category and it therefore will comprise all income and expenses not included within the other categories irrespective of volatility or their unusual nature. However, any income or loss from investments accounted for using the equity method is to be included in the investing category, regardless of the specified main business activity of the entity.

Retrospective application of the standard is mandatory for annual reporting periods starting from 1 January 2027 onwards but earlier application is permitted provided that this fact is disclosed.

The Commission is assessing the impact of this new standard on its financial statements and will implement the standard on the period it becomes effective.

- ***Annual Improvements to IFRS Accounting Standards – Volume 11 (issued in July 2024)***

These improvements include:

- IFRS 9 *Financial instruments* – Clarifies the treatment of gain/loss on derecognition of lease liabilities by a lessee; Remove and replace phrasing for 'transaction price' in relation to IFRS 15 Revenue from contracts with Customers - *effective 1 January 2026*.

This amendment is not expected to have any measurable impact on the financial statements of the Commission as it expects to hold its leases to maturity.

2. STATEMENT OF COMPLIANCE AND BASIS OF PREPARATION (CONT'D)

2.4 Use of estimates and judgements:

The preparation of the financial statements in conformity with IFRS requires management to make judgements, estimates and assumptions that affect the application of policies and the reported amounts of, and disclosures related to, assets, liabilities, contingent assets and contingent liabilities as at the reporting date and the income and expenses for the period then ended.

Actual amounts could differ from these estimates.

The estimates and associated assumptions are based on historical experience and/or various other factors that are believed to be reasonable under the circumstances, the results of which form the basis for making the judgements about carrying values of assets and liabilities that are not readily apparent from other sources.

Critical judgements in applying the Commission's accounting policies:

Critical judgements used in applying the Commission's accounting policies that have a significant risk of material adjustment in the next financial year relate to the estimated useful lives and residual values of plant and equipment, leases and other post-employment benefits.

a) ***Depreciable assets***

Estimates of the useful life and the residual value of plant and equipment are required in order to apply an adequate rate of transferring the economic benefits embodied in these assets in the relevant periods. The Commission applies a variety of methods in an effort to arrive at these estimates from which actual results may vary. Actual variations in estimated useful lives and residual values are reflected in profit or loss through impairment or adjusted depreciation provisions.

b) ***Leases - estimating the incremental borrowing rate***

If the Commission cannot readily determine the interest rate implicit in the lease, it uses its incremental borrowing rate (IBR) to measure lease liabilities. The IBR is the rate of interest that the Commission would have to pay to borrow over a similar term, and with a similar security, the funds necessary to obtain an asset of a similar value to the right-of-use asset in a similar economic environment. The IBR therefore reflects what the Commission 'would have to pay', which requires estimation when no observable rates are available or when they need to be adjusted to reflect the terms and conditions of the lease.

The Commission estimates the IBR using observable inputs (such as market interest rates) when available and is required to make certain entity-specific estimates (such as stand-alone credit rating).

3. MATERIAL ACCOUNTING POLICIES

3.1 Property and equipment

All items of property and equipment held for administrative purposes, are recorded at historical or deemed cost, less any subsequent accumulated depreciation and subsequent accumulated impairment losses.

Cost includes expenditure that is directly attributable to the acquisition of the asset. The cost of replacing part of an item of property and equipment is recognized in the carrying amount of the item if it is probable that the future economic benefits embodied in the part will flow to the Commission and its cost can be reliably measured.

The cost of day-to-day servicing of property and equipment is recognized in income as incurred.

Depreciation is calculated on the straight-line basis over the estimated useful lives of such assets. The rates of depreciation in use are:

Computers	- 4 years
Furniture, fixtures & equipment	- 10 years
Motor vehicles	- 5 years
Leasehold improvements	- 5 years
Licenses and software	- 3 years

3.2 Long-term receivables

Long-term receivables are recognized at amortized cost. Appropriate allowances for estimated irrecoverable amounts are recognized in income when there is objective evidence that the assets are impaired.

3.3 Accounts payable

Accounts payable are stated at amortized cost.

3.4 Cash and bank balances

Cash and bank balances comprise cash in hand and cash with banks.

3.5 Leases

As Lessee

The Commission applies a single recognition and measurement approach for all leases, except for short-term leases and leases of low value assets. The Commission recognizes lease obligations as lease liabilities and right-of-use assets representing the right to use the underlying assets.

The Commission recognizes right-of-use assets at the commencement date of the lease (i.e., the date the underlying assets are available for use). The right-of-use assets are measured at cost, less any accumulated depreciation and impairment losses, and adjusted for any remeasurement of lease liabilities. The cost of right-of-use assets includes the amount of the initial lease liabilities recognized, initial direct costs incurred, and lease payments made on or before the commencement date less any lease incentives received. Right-of-use assets are depreciated on a straight-line basis over the shorter of the lease term and the estimated useful lives of the assets.

3. SIGNIFICANT ACCOUNTING POLICIES (CONT'D)

3.5 Leases (cont'd)

As lessee (cont'd)

Assets and liabilities arising from a lease are initially measured on a present value basis. Lease liabilities include the net present value of the following lease payments:

- fixed payments (including in-substance fixed payments), less any lease incentives receivable.
- payments of penalties for terminating the lease, if the lease term reflects the Commission exercising that option.

Lease payments to be made under reasonably certain extension options are also included in the measurement of the liability. The lease payments are discounted using the lessee's incremental borrowing rates being the rate that the individual lessee would have to pay to borrow the funds necessary to obtain an asset of similar value to the right-of-use asset in a similar economic environment with similar terms, security and conditions.

3.6 Revenue recognition

Income comprises recurrent subvention received from the Government of Jamaica ("GOJ") and interest income. Subvention from GOJ is recognized when it is received while interest income is recognized when it is earned.

3.7 Provisions

Provisions are recognized when the Commission has a present legal or constructive obligation as a result of past events and it is probable that an outflow of resources will be required to settle the obligation. Provisions are measured at the management's best estimate of the expenditure required to settle the obligation at the reporting date and are discounted to present value where the effect is material.

3.8 Financial instruments

Financial instruments include transactions that give rise to both financial assets and financial liabilities. Financial assets and liabilities are recognised on the Commission's statement of financial position when the Commission becomes a party to the contractual provisions of the instrument.

Financial liabilities and equity instruments issued by the Commission are classified according to the substance of the contractual arrangements entered into and the definitions of a financial liability and an equity instrument. An equity instrument is any contract that evidences a residual interest in the assets of the Commission after deducting all of its liabilities.

Financial assets include cash and bank deposits, accounts receivable, long-term receivables and other current assets except prepayments.

The fair values of the financial instruments are discussed in Note 20.

3.9 Comparative information

Where necessary, comparative figures have been reclassified and or restated to conform to changes in the current year.

3. SIGNIFICANT ACCOUNTING POLICIES (CONT'D)

3.10 Employee benefits

Employee benefits are all forms of consideration given by the Commission in exchange for service rendered by employees. These include current or short-term benefits such as salaries, statutory contributions, vacation leave, non-monetary benefits such as medical care; post-employment benefits such as pensions; and other long-term employee benefits such as termination benefits.

Employee benefits that are earned as a result of past or current service are recognized in the following manner:

- Short-term employee benefits are recognized as a liability, net of payments made, and charged to expense. The expected cost of vacation leave that accumulates is recognized when the employee becomes entitled to the leave.

3.11 Foreign currencies

The financial statements are presented in the currency of the primary economic environment in which the Commission operates (its functional currency).

In preparing the financial statements of the Commission, transactions in currencies other than the Commission's functional currency, the Jamaican dollar, are recorded at rates of exchange prevailing on the dates of the transactions. At each reporting date, monetary items denominated in foreign currencies are retranslated at the rates prevailing on the reporting date. Non-monetary items that are measured in terms of historical cost in a foreign currency are not retranslated.

Exchange differences arising on the settlement of monetary items and on the retranslation of monetary items are included in the statement of comprehensive income for the period.

3.12 Related party identification

The Commission's related parties comprise:

- (i) directly or indirectly a party that:
 - controls, is controlled by, or is under common control with the Commission;
 - has an interest in the Commission that gives it significant influence over the Commission; or
 - has joint control over the Commission
- (ii) a party that is a member of the key management personnel of the Commission
- (iii) a party that is a close member of the family of an individual referred to above

A related party transaction is a transfer of resources, services or obligations between related parties, regardless of whether a price is charged.

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS YEAR ENDED MARCH 31, 2025

3. SIGNIFICANT ACCOUNTING POLICIES (CONT'D)

3.13 Grants

Grants are recognized when there is reasonable assurance that the Commission will comply with the conditions attached to the grants and that the grants will be received.

Grants are recognised in profit or loss on a systematic basis over the periods in which the Commission recognises as expenses the related costs for which the grants are intended to compensate. Specifically, grants whose primary condition is that the Commission should purchase or otherwise acquire noncurrent assets are recognised as deferred income in the statement of financial position and transferred to income over the useful lives of the related assets.

4. SUBVENTION

Income represents subvention from the Government of Jamaica from the annual national budget. Total Vote approved by Parliament was \$1,785,697,000 (2024: \$1,491,968,000) and \$41,600,000 (2024: \$40,658,000) for the recurrent and statutory budgets respectively.

The Commission's income is exempt from income tax pursuant to section 12(b) of the Income Tax Act.

	2025 \$	2024 \$
Subvention received	1,696,109,000	1,387,079,000
Surrendered to the consolidated fund (unused amount)	<u>(89,625,911)</u>	<u>(32,180,655)</u>
	1,606,483,089	1,354,898,345
Deferred income - capital assets acquired (Note 16)	<u>(62,012,462)</u>	<u>(34,741,685)</u>
Subvention in comprehensive income	<u><u>1,544,470,627</u></u>	<u><u>1,320,156,660</u></u>

INTEGRITY COMMISSION**NOTES TO THE FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2025****5. ADMINISTRATIVE AND GENERAL EXPENSE**

	2025	2024
	\$	\$
Staff costs (Note 6)	964,435,898	813,949,205
Legal and other professional fees	10,342,191	7,290,982
Computer maintenance and related expenses	32,642,716	19,694,296
Medical supplies	1,021,110	495,241
Staff welfare	1,450,050	1,457,503
Security	94,321,853	48,791,897
Janitorial	3,007,861	3,763,568
Dues and subscriptions	795,232	883,640
Insurance	9,631,608	5,907,243
Supplies and services	5,639,432	3,484,468
Motor vehicle expense	5,494,297	5,500,928
Travelling and subsistence	25,356,163	18,330,923
Maintenance of rental properties and parking lots	115,397,680	125,120,854**
Utilities and communication	31,132,630	31,835,413
Repairs and maintenance	13,241,842	17,373,590
Commissioners' fees	41,083,104	39,203,755
Meals and entertainment	14,981,071	7,712,204
Postage and delivery	33,911	4,000
Printing and stationery	6,755,966	6,644,299
Audit fees	7,160,000	2,900,000
Advertising and promotion	39,320,992	23,847,835
Bank charges	32,433	29,282
Low value assets (under \$50,000)	1,149,478	4,016,920
Training and workshops	16,026,200	9,359,825
Conference expenses	496,427	603,926
General office expenses	1,952,949	2,817,315
	<u>1,442,903,094</u>	<u>1,201,019,112</u>

** Restated to combine two balances in the prior year for maintenance items (\$6,438,582 and \$118,682,272)

6. STAFF COSTS

The number of employees at the end of the year was as follows:

	2025	2024
Temporary	14	14
Permanent	137	125
	<u>151</u>	<u>139</u>

The aggregate payroll costs for these persons were as follows:

	2025	2024
	\$	\$
Salaries, wages and related costs	768,293,197	662,015,479
Gratuity payments	156,709,226	118,573,135
Statutory contributions	39,433,475	33,360,591
	<u>964,435,898</u>	<u>813,949,205</u>

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS YEAR ENDED MARCH 31, 2025

7. GRANT

This represents a grant received from The Government of the United Kingdom of Great Britain and Northern Ireland acting through the Foreign, Commonwealth and Development Office (FCDO). The grant was established by a Memorandum of Understanding (MOU) signed on November 2, 2020 to expire March 31, 2023. The MOU was subsequently extended with the most recent extension effective as of March 19, 2025 to expire on March 31, 2026.

The total budget for the year is \$29,698,500 (£150,000), (2024: \$19,785,000 (£100,000)). The Grant received in the year was £150,000 (2024: £200,000) in cash and £71,818 (2024: £18,504) in-kind for expenses incurred directly by FCDO on behalf of the Commission

	2025 \$	2024 \$
Grant received – cash (£150,000/£200,000)	29,609,115	38,625,173
Grant received – in-kind (£71,818/£18,504)	14,397,312	3,608,000
Total grant received	44,006,427	42,233,173
Deferred income for additions to plant and equipment, and intangible included in notes 9 & 10 (Note 16)	(16,699,689)	(27,559,508)
Grant received included in income	27,306,738	14,673,665
Expenses:		
Purchase of goods and services	44,111,444	28,850,154
Consultancy services	16,549,680	5,477,466
	60,661,124	34,327,620
Net cash flow recognized in income	(33,354,386)	(19,653,955)
	2025 \$	2024 \$
Movement in FCDO grant bank balance		
Opening bank balance	35,826,194	57,892,150
Grant received	29,609,115	38,625,173
Disbursed in the year (on expenses and assets)	(62,982,480)	(58,279,128)
Foreign currency gains (losses)	508,382	(2,412,001)
Closing bank balance (Note 13)	2,961,211	35,826,194

8. INTEREST EXPENSE ON LONG TERM LEASES

IFRS 16 requires entities engaged in leasing activities to capitalize the future discounted cash outflow (lease rental payments), over the life of the agreement and report the amount as right of use assets. A similar amount is recognized as the lease liability representing the entity's obligation under the lease agreement. The interest rate used to discount the lease payments is also used to compute a finance charge on the lease obligation. This finance charge is reported as interest expense on long term leases.

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2025

9. PLANT AND EQUIPMENT

	Leasehold Improvement \$	Furniture, Fixtures and Equipment \$	Computers \$	Motor Vehicles \$	Total \$
At Cost/Valuation					
Balance at March 31, 2023 as restated	3,013,626	191,116,663	262,125,555	49,429,995	505,685,839
Additions	-	13,481,786	39,683,188	-	53,164,974
Adjustment (Note 9 (b))	-	1,266,396	-	-	1,266,396
	-	-	-	-	-
Balance at March 31, 2024	3,013,626	205,864,845	301,808,743	49,429,995	560,117,209
Additions	-	15,044,456	33,980,954	5,002,327	54,027,737
Balance at March 31, 2025	3,013,626	220,909,301	335,789,697	54,432,322	614,144,946
Accumulated Depreciation:					
Balance at March 31, 2023	3,013,626	41,262,021	132,467,854	37,997,905	214,741,406
Adjustment (Note 9 (b))	-	969,621	-	-	969,621
Charge for year	-	24,695,441	46,739,134	8,286,674	79,721,249
	-	-	-	-	-
Balance at March 31, 2024	3,013,626	66,927,083	179,206,988	46,284,579	295,432,276
Charge for year	-	25,312,522	53,602,874	7,390,534	86,305,930
Balance at March 31, 2025	3,013,626	92,239,605	232,809,862	53,675,113	381,738,206
Carrying amount					
At March 31, 2025	-	128,669,696	102,979,835	757,209	232,406,740
At March 31, 2024	-	138,937,762	122,601,755	3,145,416	264,684,933
At March 31, 2023	-	149,854,642	129,657,701	11,432,090	290,944,433

(a) Transferred assets included in plant and equipment were fully depreciated as of 31 March 2022. See Note 14.

(b) The adjustment comprise recognition of assets at cost not previously recognized that is in use by the Commission.

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS YEAR ENDED MARCH 31, 2025

10. INTANGIBLE ASSETS

Intangible assets represent licenses and software with an estimated useful life of three (3) years.

Intangible assets in the statement of financial position were determined as follows:

	2025 \$	2024 \$
Cost		
Balance at the beginning of the year	84,609,030	62,716,771
Additions	5,712,950	21,892,259
	<u>90,321,980</u>	<u>84,609,030</u>
Accumulated Amortisation		
Balance at the beginning of the year	(56,790,525)	(35,668,401)
Current year	(24,199,578)	(21,122,124)
	<u>(80,990,103)</u>	<u>(56,790,525)</u>
Carrying amount	<u>9,331,877</u>	<u>27,818,505</u>

Intangible assets acquired during the 2024 financial year were brought into use near the end of that financial year. Therefore, no depreciation was accounted for on the acquisitions.

Intangible assets are being amortised over 3 years for the license and software, unless there is significant impairment during the year.

11. LOANS RECEIVABLE

	2025 \$	2024 \$
Staff loans:		
Loan balance	617,076	831,805
Accrued interest	8,174	9,059
	<u>625,250</u>	<u>840,864</u>

The Commission had a motor vehicle revolving loan scheme to assist traveling officers to purchase reliable motor vehicles to be used in the performance of their official duties. The scheme was terminated during the 2024 financial year and the funds accumulated transferred to the Account General's Department (see the Statement of Changes in Reserves). Other staff loans disbursed up to a maximum of \$300,000 are repayable within 12 months with interest at 3% charged on the reducing balance. Staff loans are recovered by salary deduction.

12. PREPAYMENTS AND DEPOSITS

	2024 \$	2025 \$
Prepaid rent	6,125,365	6,331,851
Other prepayments	327,987	213,211
Security deposit	29,129,100	29,129,100
Deposit on fixed assets	18,971,464	-
	<u>54,553,916</u>	<u>35,674,162</u>

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS YEAR ENDED MARCH 31, 2025

13. CASH AND BANK BALANCES

Cash and bank balances included in the statement of financial position and statement of cash flows are comprised of the following:

	2025 \$	2024 \$
Petty cash	200,000	200,000
Cash in J\$ current accounts	484,708	239,742
Cash in FCDO foreign currency account - £14,950 (2024:- £184,499)	2,961,211	35,826,194
	<u>3,645,919</u>	<u>36,265,936</u>

The FCDO bank account is used to facilitate the receipt and disbursement of the FCDO grant.

14. TRANSFERRED ASSETS

This represents net assets of the three legacy entities merged. The assets are included in plant and equipment at a carrying amount of \$Nil as at March 31, 2025 (2024: \$Nil).

	2025 \$	2024 \$
Office of the Contractor General	33,010,640	33,010,640
Commission for the Prevention for Corruption Integrity Commission (Legacy)	(4,702,646) 6,638,916	(4,702,646) 6,638,916
	<u>34,946,910</u>	<u>34,946,910</u>

These assets were fully depreciated in the Commission's accounts as of 31 March 2022.

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS YEAR ENDED MARCH 31, 2025

15. RIGHT-OF-USE ASSETS/LEASE LIABILITIES

Recognised in non-current assets

	2025 \$	2024 \$
Balance of cost at the beginning and end of the year	676,974,037	676,974,037
Depreciation charge of right-of use assets		
Balance at the beginning of the year	(151,613,762)	(60,374,021)
Charge for the year	(91,203,107)	(91,239,741)
	(242,816,869)	(151,613,762)
Carrying amount	434,157,168	525,360,275

Amounts recognised in the statement of comprehensive income

Surplus/(deficit) for the year includes the following amounts relating to leases:

	2025 \$	2024 \$
Depreciation expense on right-of-use asset	91,203,107	91,239,741
Interest expense on lease liability (note 8)	38,726,421	43,196,773
Expense relating to short-term leases	28,491	-

The total cash outflow for leases in 2025 was \$109,946,723 (2024: 102,175,167).

Net debt reconciliation

This section sets out an analysis of net debt and the movements in net debt for each of the years presented.

	2025 \$	2024 \$
Lease liability		
Net debt as at 1 April	617,534,343	676,512,737
Additional lease obligations	-	-
Cash flows- Lease payments	(109,946,723)	(102,175,167)
Financing cash flows Interest expense	38,726,421	43,196,773
Net debt as at 31 March	546,314,041	617,534,343

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS YEAR ENDED MARCH 31, 2025

15. RIGHT-OF-USE ASSETS/LEASE LIABILITIES (CONT'D)

Maturity Analysis	2025 \$	2024 \$
Year 1	114,617,183	109,946,723
Year 2	121,714,067	114,617,183
Year 3	116,153,371	121,714,067
Year 4	82,829,716	116,153,371
Year 5	88,618,738	82,829,716
Over 5 years	135,454,884	224,073,622
	<u>659,387,959</u>	<u>769,334,682</u>
Less unearned interest	<u>(113,073,918)</u>	<u>(151,800,339)</u>
	<u>546,314,041</u>	<u>617,534,343</u>
<i>Analysed as:</i>		
Non-current	465,211,675	551,671,143
Current	81,102,366	65,863,200

The Commission contracted three long-term leases in the 2023 financial year as detailed below. The Sagicor lease which is a new location was partially occupied at the end of the 2023 financial year due to works being completed by the Lessor.

- (i) Thirty-six (36) parking spaces leased from National Water Commission which is located at 18 Oxford Road, Kingston 5. The lease term is for three (3) years commencing on the May 16, 2022 and expires May 15, 2025 with an option to extend.
- (ii) Office space leased from Planning Institute of Jamaica (PIOJ) which is located at 16 Oxford Road, Kingston 5 (1st Floor). The lease term is for five (5) years commencing on January 1, 2023 and expires December 31, 2028 with an option to renew for a further five (5) years.
- (iii) Office space leased from Sagicor Life Jamaica Limited which is located at 63-67 Knutsford Boulevard, Kingston 5 (Sagicor Sigma Building 3rd to 6th floors). The lease term is for ten (10) years commencing September 1, 2021 and expires August 31, 2031. There is an option to renew the lease for 2 further consecutive terms of five years. The Sagicor lease payment commenced in May 2022, upon the Integrity Commission occupying the 4th floor of the Sagicor building. The monthly lease payment amount was \$1,163,959.38 and this monthly payment continued until January of 2023. The monthly payment for all four (4) floors of \$4,965,174.50 commenced in February 2023, when the 3rd, 5th and 6th floors were ready to be occupied. The annual increase in the rent is 7%.

The lease agreements do not impose any covenants other than the security interests in the leased asset that is held by the lessor. Leased assets are not used as security for borrowing purposes.

The discount rate used for the leases approximate 6.8%.

INTEGRITY COMMISSION**NOTES TO THE FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2025**

16. DEFERRED INCOME

This represents cash received under object 32 of GOJ chart of accounts and FCDO grant funding to acquire plant and equipment and intangible assets, which is subsequently amortised to income over the life of the acquired assets.

	2025 \$	2024 \$
Opening balance	269,195,445	307,858,946
Assets acquired (Note 16.1)	78,712,151	62,301,193
Amortization of assets being used	<u>(110,505,508)</u>	<u>(100,964,694)</u>
Closing balance	<u>237,402,088</u>	<u>269,195,445</u>

16.1 Assets acquired during the year were financed as follows:

	2025 \$	2024 \$
GOJ subvention (Note 4)	62,012,462	34,741,685
FCDO grant (Note 7)	<u>16,699,689</u>	<u>27,559,508</u>
	<u>78,712,151</u>	<u>62,301,193</u>

17. PAYABLES AND ACCRUALS

	2025 \$	2024 \$
Payables	10,553,707	10,607,555
Accrued audit fees	5,000,000	5,775,000
Accrued vacation leave	36,482,036	29,245,745
Other accruals	<u>1,968,690</u>	<u>110,050</u>
Closing balance	<u>54,004,433</u>	<u>45,738,350</u>

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2025

18. RECONCILIATION OF CASH-BASIS TO ACCRUAL BASIS

18(a)

	2025	
	\$	\$
Net deficit for the year, being total comprehensive loss		<u>(61,176,229)</u>
Subvention utilised	1,606,483,089	
Grant received	<u>44,006,427</u>	
Total cash received		1,650,489,516
Cash spent on administrative and general expenses	(1,597,949,291)	
Deferred income – subvention deferred	<u>(62,012,462)</u>	
		<u>(1,659,961,753)</u>
		(9,472,237)
Accrual-basis adjustments:		
Accrued vacation leave, net	(7,236,290)	
Prepayments, net	(91,710)	
Reversal of lease rental payments	109,946,723	
Lease interest expense	(38,726,421)	
Depreciation charge on right-of-use asset	(91,203,107)	
Depreciation charge on plant, equipment and intangibles	(110,505,508)	
Deferred income amortised	110,505,508	
Bank charges	32,433	
Foreign exchange gain	508,382	
Interest income	31,770	
Accruals, net	(8,266,083)	
Other	<u>-</u>	
		(35,004,303)
Grant:		
Deferred income	<u>(16,699,689)</u>	
		<u>(16,699,689)</u>
		<u>(61,176,229)</u>

INTEGRITY COMMISSION

NOTES TO THE FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2025

18. RECONCILIATION OF CASH-BASIS TO ACCRUAL BASIS (CONT'D)

18(a) (Cont'd)

	2024	
	\$	\$
Net deficit for the year, being total comprehensive loss		(42,154,680)
Subvention utilised	1,354,898,345	
Grant received	42,233,173	
Total cash received		1,397,131,518
Cash spent on administrative and general expenses	(1,201,019,112)	
Deferred income	25,660,211	
		(1,175,358,901)
		221,772,617
Accrual-basis adjustments:		
Accrued vacation leave, net	10,930,664	
Prepayments, net	(9,259,142)	
Reversal of lease rental payments	102,175,167	
Lease interest expense	(43,196,773)	
Depreciation charge on right-of-use asset	(91,239,741)	
Depreciation charge on plant, equipment and intangibles	(100,843,373)	
Deferred income amortised	(96,004,938)	
Bank charges	29,282	
Foreign exchange gain	(2,422,541)	
Interest income	59,217	
Accruals, net	(4,457,672)	
Other	1,140,309	
		(233,072,541)
Grant:		
Deferred income	(25,895,000)	
		(25,895,000)
		(37,194,924)

18(b) RECONCILIATION OF DEFICIT TO SURPLUS

	2025 \$	2024 \$
Reported deficit	(61,176,229)	(37,194,924)
Adjustment for depreciation and amortisation charged	201,708,615	192,083,114
Net effect of complying with IFRS 16 (Leases)	(71,220,302)	(58,978,394)
Net effect of other adjustments	(1,067,167)	3,633,014
Surplus before depreciation, amortization & finance charges	68,244,917	99,542,810

INTEGRITY COMMISSION**NOTES TO THE FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2025**

19. RELATED PARTIES

The Commission's statement of financial performance includes the following transactions, undertaken with related parties in the ordinary course of business:

	2025 \$	2024 \$
Transactions with Commissioners:		
Commissioners' fees	<u>41,008,050</u>	<u>39,203,755</u>
Remuneration for key management personnel:		
Executive Director	17,866,212	16,439,186
Director, Information and Complaints	14,369,213	13,321,893
Director of Corruption Prosecution	14,606,113	13,548,973
Director of Investigation	14,369,213	13,321,893
Director, Corruption Prevention	14,440,483	13,155,436
Director, Corporate Services	16,158,895	8,290,311
Director, Finance and Accounts	13,193,218	7,704,617
Director, Information Systems	20,352,481	10,148,552
Manager, Declaration and Financial Investigations	7,764,576	8,077,541
Manager, Financial Analysis	8,316,552	6,836,952
Employer contribution for personnel	<u>4,488,118</u>	<u>4,222,660</u>
	<u>145,925,074</u>	<u>115,859,861</u>
	<u>186,933,124</u>	<u>155,063,616</u>

Other short-term benefits paid on behalf of Commissioners and key management personnel amounted to \$2,719,663 (2024: \$1,746,122).

20. FINANCIAL INSTRUMENTS

(a) Fair value

Fair value is the amount for which an asset could be exchanged, or a liability settled, between knowledgeable, willing parties in an arm's length transaction. A market price, where an active market (such as a recognized stock exchange) exists, is the best evidence of the fair value of a financial instrument. Market prices are not available for some of the financial assets and liabilities of the Commission. Fair values in the financial statements have therefore been presented using various estimation techniques based on market conditions existing at reporting date.

Generally, considerable judgement is required in interpreting market data to develop estimates of fair value. Accordingly, the estimates presented in these financial statements are not necessarily indicative of the amounts that the Commission would realise in a current market exchange.

The amounts included in the financial statements for cash and bank deposits, receivables and payables, reflect the approximate fair values because of the short-term maturity of these instruments.

(b) Financial risk management

The Commission has exposure to the following risks from its use of financial instruments:

- Credit risk
- Liquidity risk
- Market risk

The Commissioners, together with senior management, have overall responsibility for the establishment and oversight of the Commission's risk management framework.

NOTES TO THE FINANCIAL STATEMENTS
YEAR ENDED MARCH 31, 2025

20. FINANCIAL INSTRUMENTS (CONT'D)

(b) Financial risk management (cont'd)

The Commission's risk management policies are established to identify and analyse the risks faced by the commission in order to set appropriate risk limits and controls, and to monitor risks and adherence to limits. Risk management policies and systems are reviewed regularly to reflect changes in market conditions and the Commission's activities.

(i) Credit risk

Credit risk is the risk that one party to a financial instrument will fail to discharge an obligation and cause the other party to incur a financial loss. The Commission's principal financial assets are cash and bank deposits; and receivables and prepayments.

Cash and bank balances

The credit risk on cash and bank deposits is limited as they are held with financial institutions with high credit rating.

At reporting date, there were no significant concentrations of credit risk and the maximum exposure to credit risk is represented by the carrying amount of each financial asset.

	2025 \$	2024 \$
Loans receivable	625,250	840,864
Deposits	48,100,564	29,139,100
Cash and bank balances	3,645,919	36,265,936
	<u>52,371,733</u>	<u>66,245,900</u>

(ii) Liquidity risk

Liquidity risk is the risk that the Commission will not meet its financial obligations as they fall due. The Commission's approach to managing liquidity is to ensure, as far as possible, that it will always have sufficient liquidity to meet its liabilities when due, under both normal and stressed conditions, without incurring unacceptable losses or risking damage to the Commission.

The following are the contractual maturities of the financial liabilities excluding the impact of any netting agreement.

	Carrying Amount \$	Contractual Cash flow \$	Less than 1 year \$
March 31, 2025			
Other payables	<u>10,553,707</u>	<u>10,553,707</u>	<u>10,553,707</u>
March 31, 2024			
Other payables	<u>10,607,555</u>	<u>10,607,555</u>	<u>10,607,555</u>

(iii) Market risk

Market risk is the risk that changes in market prices, such as interest rates will affect the Commission's holding of financial instruments. The objective is to manage and control market risk exposures within acceptable parameters, while optimising the return.

20. FINANCIAL INSTRUMENTS (CONT'D)

(b) Financial risk management (cont'd)

(iii) Market risk (cont'd)

Interest rate risk:

Interest rate risk is the risk that the value of a financial instrument will fluctuate due to changes in market interest rates.

Interest-bearing financial assets comprise bank deposits and staff loans, which have been contracted at fixed interest rates for the duration of their terms.

Fair value sensitivity analysis for fixed rate instruments

The Commission does not hold any fixed rate financial assets that are subject to material changes in fair value through profit or loss. There are no instruments that are measured at fair value after initial recognition. Therefore, a change in interest rates at the reporting dates would not affect net income or equity.

21. LITIGATION

The Commission is a party to various claims and legal actions in the normal course of its activities. Although the ultimate result of legal proceedings cannot be predicted with certainty, it is the opinion of the Commission's management that the outcome of any claim which is pending, either individually or on a combined basis, will not have a material effect on the financial position of the Commission.

At the reporting date and up to the date of these financial statements no matters have been adjudicated or actioned against the Commission on the advice of its legal representatives that would require a provision or disclosure in these financial statements.