



THE TWENTY-SEVENTH REPORT OF THE COMMISSION FOR STANDARDS IN PUBLIC LIFE (CSPL)

1 FEBRUARY 2024 – 31 JULY 2024

Table of Contents

SECTION ONE – INTRODUCTION **3**
SECTION TWO – MEETINGS AND ADMINISTRATIVE MATTERS OF THE CSPL **5**
SECTION THREE – STANDARDS IN PUBLIC LIFE (SPL) ACT **6**
SECTION FOUR – PROCUREMENT **7**
SECTION FIVE – REGISTER OF INTERESTS (ROI) **8**
SECTION SIX – STRENGTHENING PARTNERSHIPS AND LEGISLATIVE ACCOUNTABILITY **10**
SECTION SEVEN – CONFLICTS OF INTEREST **13**
SECTION EIGHT – EDUCATION AND PUBLIC RELATIONS **14**
SECTION NINE – COMPLAINTS **16**
SECTION TEN – MOVING FORWARD **17**
SECTION ELEVEN – APPENDIX **18**

SECTION ONE – INTRODUCTION

1. Preface

The Commission for Standards in Public Life (the "CSPL") was established as an institution supporting democracy under the Cayman Islands Constitution Order 2009 (the "Constitution"). Its introduction reinforced the need to have regard to ethics and transparency as important elements of a democratic society and the necessary protection of the rights and freedoms of the people in the Cayman Islands.

With its mandate as set out in section 117(9) of the Constitution, the first CSPL was appointed in January 2010. The CSPL's overarching powers are ingrained in the Standards in Public Life Act, 2021 and the Standards in Public Life Regulations, 2020.

1.1. Membership of the CSPL

As prescribed in the Constitution, the Governor shall, after consulting the Premier and the Leader of the Opposition, appoint, from among persons of high integrity and with experience in the public or private sector, the CSPL comprising –

1. A Chairperson;
2. A chartered or certified accountant with at least ten years' experience;
3. A legal practitioner who has practiced in the Commonwealth for at least ten years; and
4. Not more than two other members.

(See Appendix for current membership)

1.2. Summary of CSPL Activities

This Report outlines the progress made and the key issues identified by the CSPL over the period 1 February 2024 – 31 July 2024.

1.3. During the current reporting period the Members have:

a. continued to discuss the Standards in Public Life (SPL) (Amendment) Bill and SPL (Amendment) Regulations and agreed to their finalisation;
b. continued to follow up on the Parliamentary Code of Conduct;
c. improved the Register of Interests portal for the 2024 declaration period;
d. considered the hiring practices of the Port Authority;

e. established a Memorandum of Understanding with the Anti-Corruption Commission;

f. executed the public relations and education initiatives plan for 2024;

g. approved the 24th, 25th and 26th CSPL Reports;

h. discussed media articles on subjects relating to its remit; and

i. discussed and issued various correspondence relating to complaints, enquiries and other investigations.

SECTION TWO – MEETINGS AND ADMINISTRATIVE MATTERS OF THE CSPL

2.1. Meetings

The reporting period for this Report commenced on 1 February 2024. During this period, the CSPL held general meetings on 7 March 2024, 24 April 2024, 1 May 2024, and 5 June 2024. Additionally, extraordinary meetings were held on 27 February 2024, 11 March 2024, and 13 March 2024.

The minutes of these meetings reflect the matters discussed and undertaken by the CSPL. Copies of the CSPL meeting minutes are available on the CSPL's website.

2.2. Appointment of New CSPL Members

The Constitution allows for up to 5 members to be appointed to the CSPL, and it was noted that current members' terms are set to end in 2025. The Commissions Secretariat (the "Secretariat") Manager worked on a recruitment drive for members via the Expressions of Interest advertisement programme, which began on 26 April 2024. From this, 4 expressions of interest were received for the CSPL, though 3 of the 4 submissions did not meet the eligibility criteria. The recruitment process would continue through the next reporting period.

2.3. Secretariat HR Update

The post of Manager of the Secretariat was filled in February 2024. Along with the Deputy Manager post at the Secretariat, which was filled in January 2024, this completes the recruitment exercises for the Secretariat senior leadership team.

SECTION THREE – STANDARDS IN PUBLIC LIFE (SPL) ACT

3.1. Amendments to the SPL Act and Regulations

The CSPL met with the Attorney General's Chambers (AGC) on 3 April 2024 regarding the Parliamentary Code of Conduct. At that meeting additional changes to the SPL Act relating to the Parliamentary Code were also discussed. The CSPL continues to await a written copy of the proposed additional amendments to the SPL Act from the AGC. Details of the proposed changes to the Parliamentary Code of Conduct which impact the SPL Act can be found in Section Six on Codes of Conduct below.

SECTION FOUR – PROCUREMENT

4.1. CSPL and Procurement Procedures

a. Lateral Flow Tests/Procurement Procedures

The CSPL has been monitoring issues with procurement procedures, including those relating to the procurement of lateral flow tests by CIG during the COVID Pandemic, since late 2022. Members received a response to their letter to the Office of the Auditor General (OAG) on 4 April 2024, providing updates on the recommendations made in the report titled *Review of the Procurement of the Lateral Flow Tests*. The Commission replied to the Auditor General on 12 June 2024 and requested a meeting to discuss this issue, as well as other related matters. For more on this, refer to section 6.2 below on the MOU with the Auditor General.

The Auditor General replied on 12 July 2024 and a tentative date for the meeting was scheduled for September 2024 between the CSPL and OAG representatives.

b. OAG Investigation into Government Procurement Practices

The Commission noted, from media articles, that there was an investigation being conducted by the OAG into Government contracts not complying with procurement procedures. This prompted members to consider the possibility of establishing a Memorandum of Understanding (MOU) with the Office of the Auditor General to enable more open discussion on such matters.

A letter proposing the same was sent to the Auditor General on 20 March 2024. Her response provided an update on the OAG investigation into CIG procurement practices. For more on this, refer to section 6.2.

SECTION FIVE – REGISTER OF INTERESTS (ROI)

5.1. Background and Developments

The functions of the CSPL include, amongst other things, *"to supervise the operation of registers of interest and to investigate breaches of established standards…"* (section 117(9)(c) of the Constitution).

In accordance with s.121(1) of the Constitution, *"There shall be for the Cayman Islands a Register of Interests, which shall be maintained by the Commission for Standards in Public Life."* Section 121(2) elaborates that all Persons in Public Life have a constitutional obligation to declare to the CSPL, *"for entry in the Register of Interests, such interests, assets, income and liabilities of that person, or of any other person connected with him or her, as may be prescribed by [the] Act."* The SPL Act and Regulations were commenced in early 2020 to outline the operation of the Register and the process for submissions to it.

The ROI in accordance with s.121(1) of the Constitution, and the introduction of the SPL Act in accordance with s.117(9)(c) of the Constitution to, amongst other things, provide CSPL with the powers *"to supervise the operation of registers of interests and to investigate breaches of established standards…".* Furthermore, the commencement of the SPL Regulations, 2020 provided the approved form for declarations of interests, income, assets and liabilities to be completed by Persons in Public Life and give effect to the various provisions of the SPL Act. Both legislative documents combined provide the CSPL with the power needed to meet its constitutional mandates to supervise the operation of the ROI and to investigate breaches of established standards in public life.

In 2020, the CSPL received the first filings of annual declarations to the ROI in accordance with the SPL Act. Following receipt of these declarations, the CSPL embarked on the development of a system to allow for the electronic filing of annual declaration forms by Persons in Public Life. The online ROI portal was launched in 2021.

5.2. Register of Interests (ROI)

For the ROI annual submission period for 2023-2024, 883 declarations were submitted in total, 857 of which were submitted online, and 26 of which were submitted in hard-copy. A summary of the submission statistics is as follows:-

	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024
Online Submissions	-	741	689	786	857*
Hard Copy Submissions	833	100 (approx.)	50 (approx.)	9	26*
Total Submissions	833	841 (approx.)	739 (approx.)	795	883*

**Totals as of the preparation of this report on 23 January 2025*

Updates to the ROI Portal requested by the CSPL were successfully carried out, which continued to improve portal functionality for online declarants, contributing to the highest number of online submissions, and total submissions, in the five years that the Register of Interests scheme has been in operation under the Standards in Public Life Act.

Members welcomed an additional staff member to the Secretariat, an Intern/Office Support Administrator who had performed the same role in 2023, who was brought on specifically to assist with the ROI declaration period. He assisted with troubleshooting calls, collecting accurate data and doing some preliminary work with the online portal.

During the declaration period (July 2024) the Chairman and a Secretariat staff member attended interviews at various local radio stations as a part of ROI promotional activities: Radio Cayman (8 July), 106.1 KISS FM and Magic 91.5 FM (11 July), and Z 99.9 FM and Gold 94.9 FM (17 July).

The Commission is keen to finalise the process for identifying and pursuing Persons in Public Life who have not complied with their legal requirement to file declarations. Members wished to prioritise reviewing the compliance of Persons in Public Life with annual submissions in descending order, starting with Members of Parliament, Chief Officers, heads of Statutory Authorities, and members of Constitutional Commissions and governing bodies of Statutory Authorities and Government Companies. Once the process is established, consideration will need to be given to how any notices of non-compliance will be communicated to any Persons in Public Life with potentially overdue declarations.

SECTION SIX – STRENGTHENING PARTNERSHIPS AND LEGISLATIVE ACCOUNTABILITY

6.1. MOU with the Anti-Corruption Commission

Based on the Anti-Corruption Commission's (ACC) proposal to enter into an MOU with the CSPL in November 2023, the CSPL agreed that the draft MOU prepared by the ACC was fit for purpose. The MOU was subsequently signed and finalised by both parties on 17 April 2024.

The CSPL also considered how communication between the two entities would work, specifically who would act as the point of contact when information is exchanged, and developed guidelines to describe exactly how the process would work.

6.2. MOU with the Auditor General

Based on discussions surrounding procurement issues noted from media articles (see Section Four on Procurement above), the Commission wrote to the Auditor General on 20 March 2024 to propose the two entities entering into an MOU. The Commission noted news articles that the Auditor General would be stepping down from her position at the end of 2024, however, it was agreed that this did not prevent the proposed meeting from taking place. Her response was positive, and so the CSPL replied on 12 June 2024 and requested a meeting to discuss this issue.

A tentative date for the meeting between the CSPL and OAG representatives was scheduled for September 2024.

Issues mentioned in Section Four above related to procurement would also be raised in this meeting.

6.3 Update re Parliamentary Code of Conduct

On 8 March 2024 the CSPL wrote to the Premier, Hon. Juliana O'Connor-Connolly, who assumed her new role as Premier in November 2023, requesting an update on the status of the publication of the Parliamentary Code of Conduct (the "Parliamentary Code"). The CSPL was subsequently invited to attend a meeting with the Attorney General on 3 April 2024 to discuss changes to the Parliamentary Code.

The meeting was attended by the Attorney General, the CSPL Chairman and Member Rosalie Twohey, along with Secretariat Staff and staff from the Attorney General's Chambers. It was agreed in the meeting that proposed changes to the Parliamentary Code, and related changes to the Standards in Public Life draft Amendment Bill, which has not yet been finalised, would be documented and circulated to the Commission for consideration.

The Commission continued to follow up with the Attorney General's Chambers for the remainder of the reporting period, but an updated draft was not received. The Commission was advised that discussions with other stakeholders of the Parliamentary Code remained ongoing.

6.4 Elections Observer's Report and Campaign Financing Reform

The CSPL continued to issue follow-up correspondence to the Supervisor of Elections (SoE) regarding the status of the recommendations noted in the Cayman Islands General Elections 2021 Domestic Observers' Report. The Commission received an update from the SoE on 26 March 2024 indicating that he would be presenting an updated cabinet paper to Caucus on this subject in the next few weeks. it was noted that this would be the fourth attempt at securing Cabinet approval for drafting instructions for amendments to the Elections Act.

Related to this, the Commission noted a media article titled 'JOCC reveals plan to review campaign financing,' published on 12 January 2024. The CSPL therefore wrote to the Premier on 15 May 2024 to request an update on her plans to review campaign financing, as well as progress made on the recommendations of the Domestic Observers' Report.

An email was received from the SoE on 16 May 2024 which provided an update on the status of progressing the recommendations from the Elections Observer's Report (EOR). It also made a specific request of the Commission to assist the Supervisor's efforts by advocating for the need for greater political support in addressing the concerns identified in the EOR, and identified the Constitutional Commission as potentially being in a position to address any constitutional changes.

The Commission considered the Supervisor's requests and drafted correspondence to the Premier, seeking an update on the 2021 Election Observers' Report recommendations and the Premier's campaign finance reform initiative.

6.5 Recent and Upcoming Trials of the Former Speaker of the House

The indecent assault trial against the former Speaker of the House, Mr W. McKeeva Bush, which collapsed at the end of February 2024, was noted. Additionally, there was a separate trial scheduled to begin on 24 June 2024. The Chairman raised the provision in the Standards in Public Life Act, section 22, which prevents the Commission from investigating a matter until all other investigations are complete. Members agreed, however, that both matters should continue to be monitored closely.

SECTION SEVEN – CONFLICTS OF INTEREST

7.1 Port Authority Director Appointment

In November 2022, the Port Authority of the Cayman Islands (PACI) and CSPL exchanged correspondence regarding any progress made by PACI against the recommendations in the Internal Audit Service report titled, 'Human Resources Review' (Port Authority Cayman Islands) July 2022.

Following this exchange, in 2023 the CSPL agreed that an update was required on the status of PACI's internal policies and procedures framework regarding its hiring practices. Correspondence requesting a copy of the procedural steps for hiring staff was issued to PACI's Director on 29 November 2023.

The PACI Director sent the full Port Authority Employee Manual, along with amendments/updates, to the CSPL on 14 March 2024. Members reviewed the relevant sections relating to hiring and termination procedures and agreed that the manual appears to satisfy the recommendations of the Internal Audit Service Report from July 2022.

The Commission responded to the PACI Director, cc'ing the PACI Chairman, on 15 May 2024 thanking them for their cooperation and their efforts in complying with the recommendations, and stating that CSPL is satisfied with the results.

7.2 Conflict of Interest Issues Reported on at the Department of Tourism

After noting the media article titled 'Controversial sports tourism strategy targeted prawn sandwich soccer fans' published on 6 November 2023, the Commission wrote to the Director of the Department of Tourism (DoT) on 30 April 2024 requesting an update on the matter. The Director of DoT replied on 13 June 2024 and the Commission agreed to respond requesting further details.

SECTION EIGHT – EDUCATION AND PUBLIC RELATIONS

8.1 United Nations Education for Justice (E4J) Programme

On behalf of the CSPL the Secretariat reached out to the Department of Education Services to request for CSPL to attend 2024-2025 teacher professional development days to introduce teachers to the E4J programme. Unfortunately, the Secretariat did not receive a response by the end of the reporting period. The proposed strategy moving forward is to seek dates of public schools' professional development days to arrange for the CSPL to provide presentations to educators. The audience being targeted is educators of upper key stage 2 and IGCSE-age or equivalent.

8.2 CSPL Introductory Video

The CSPL made plans to update the introductory video explaining the Commission and its purpose/functions for use at the ongoing CIG New Employee Orientations and for other general informational purposes. Members approved a script for the video and by the end of the reporting period voiceover recording had taken place and production was underway.

8.3 Register of Interests

A major portion of the education and public relations activities for the Commission for this period related to the annual declaration period for the Register of Interests, preparations for which began in May. Activities included publishing an informational blog post on the civil service intranet website site, The Hub; producing public service announcements via Radio Cayman; the Chairman participating in radio interviews on various local morning radio talk shows; updated tutorial videos to support new declarants in filing declarations online; as well as other promotional and reminder messaging for the July declaration period. The Commission was also pleased to have the Deputy Governor agree to participate in a promotional ROI video, which was circulated to civil service senior leaders via email on 10 July and posted to The Hub.

8.4 Media Articles

Members continued to review media articles which the PR & Education Coordinator had circulated to them that were relevant to their remit. It was noted, however, that articles relevant to the CSPL often also fell under the remit of other public bodies. Therefore, the Commission

agreed to establish a list of criteria which the Secretariat could use to filter news articles that would be of particular relevance to the Commission when conducting media scanning. This 'Media Intervention Criteria' would be used moving forward.

8.5 Commonwealth Caribbean Association of Integrity Commissions and Anti-Corruption Bodies (CCAICACB) Membership & Conference

The Chairman and Member Rosalie Twohey attended the Annual General Meeting (AGM) for CCAICACB via Zoom in March. The Anti-Corruption Commission Chairman was also present at this meeting, and the CSPL Chairman advised that they exchanged correspondence on the two entities' participation as members in CCAICACB and representation at the conference.

Members discussed the financial governance of the organisation, following the CCAICACB AGM in which it was noted that no Treasurer had yet been appointed, and there were difficulties accessing the relevant bank accounts. It was agreed that the CSPL should seek assurances on these matters before approving the payment of membership fees. After receiving and considering the CCAICACB's response, it was determined that that membership fees should not be paid at this time.

SECTION NINE – COMPLAINTS

9.1 Complaints

During the reporting period, the Commission navigated a number of complaints and enquiries, touching on a broad spectrum of topics. These ranged from ethical concerns in governmental decision-making to the transparency of public institutions. In all of these cases, the Commission upheld a policy of strict confidentiality. This approach safeguards against potential harm to the reputations of those accused of wrongdoing, and allows for a fair and impartial assessment of the facts. The Commission will continue to receive and respond to complaints relating to issues within its purview, such as conflicts of interest and adherence to ethical codes.

None of the complaints or enquiries considered during this period led to the Commission deciding to open a formal investigation.

SECTION TEN – MOVING FORWARD

10. Over the next reporting period the CSPL will continue to:

a. draft the next CSPL Report;

b. prepare statistics on the 2024 ROI declaration period to consider how to proceed with notifying non-compliant Persons in Public Life;

c. meet with representatives from the Officer of the Auditor General;

d. consider establishing a Memorandum of Understanding with the Auditor General;

e. continue to follow up on the status of the 2021 Election Observers' Report recommendations and the Premier's campaign finance reform initiative;

f. continue to execute the public relations and education initiatives plan for 2024;

g. discuss media articles on subjects relating to its remit;

h. continue to follow up on the Parliamentary Code of Conduct;

i. continue to follow up on the draft Standards in Public Life (SPL) (Amendment) Bill and SPL (Amendment) Regulations;

j. discuss and issue correspondence relating to complaints, enquiries and other investigations.

For more information on the CSPL please visit www.standardsinpubliclifecommission.ky. Alternatively, you can e-mail info@standardsinpubliclifecommission.ky or call 244-3685.

Dated this 23rd day of August 2025.

Dr Sonia Bush (Chairman)

Keith Blake

J. Rosalie Twohey

SECTION ELEVEN – APPENDIX

11.1. Members' Biographies



Dr Sonia Bush is an Attorney at Law in the Cayman Islands as the owner and sole practitioner of Sonia Bush and Associates Law. **Sonia** obtained a LLB (Hons) degree from the University of Liverpool, and she was trained by one of Cayman's top law firms. Additionally, **Dr Bush** obtained a Bachelor's of Science Degree in International Finance, (BSc.), a Master of Business Administration Degree (MBA), a Master of Science Degree (MSc.), and a PhD in Management with a minor in Leadership. She also is a registered member of the Society of Trust and Estate Practitioners, and a designated Trust and Estate Practitioner ("TEP") since 2001.

Sonia was called to the Cayman Islands Bar in July 2009, and broadened her exposure to offshore trusts, while working as an attorney at law in Jersey, Channel Islands. Her areas of practice include Trust and Estate Planning, Business Formation, Company Incorporation, Intellectual Property including registration of Trademarks, Work Permits, Family Law, Residency, Guardianship, Wills, Probate and Administration and Real Estate. **Sonia** is also a Notary Public and provides this service from the Firm's office. In addition to practicing law, Sonia has worked over ten years in the financial industry in the Cayman Islands, in particular at offshore trust and banks as a Trust Account Manager.

Dr Bush was appointed as Chairman effective 1 May 2021 for a four-year term.



Mrs J. Rosalie Twohey became a CPA in 1986 after being awarded a BSc (Cum Laude) in Accounting from Howard University. After six years as an auditor **Rosalie** served a short stint as the, Financial Controller of Walkers Global Holdings Ltd after which she served as Head of Institutional Business with the Butterfield Bank Trust Company Limited. Previously she acted in the same role with Bank Austria Cayman Islands Ltd. In addition to her MBA awarded from the University of Liverpool, **Rosalie** pursued and was successful in gaining an LLM from the same institution.

Mrs Twohey was appointed as a Member effective 1 May 2021 for a four-year term.



Mr Keith Blake was a Senior Director with Alvarez & Marsal, based in the Cayman Islands, until his recent retirement. He has more than 30 years of insolvency and restructuring experience, including the last 21 years working in the Cayman Islands. After leaving school, **Mr Blake** spent 10 years at NatWest Bank in the U.K., with the last 18 months of that time working in the bank's Insolvency and Debt Recovery department in London. In 1990 **Mr Blake** joined KPMG in London, spending nine years working on the liquidations of a number of banks, including several that had previously traded in the secondary market of Latin American sovereign-backed debt.

Drawing upon this experience, **Mr Blake** moved to KPMG in the Cayman Islands in January 2000 to assist in liquidating the Cayman and British Virgin Islands (BVI) subsidiaries of one of the (at the time) largest Brazilian international banks. Staying in the Cayman Islands, **Mr Blake** continued to work at KPMG taking many appointments as Joint Voluntary Liquidator of Cayman hedge funds and other entities. In addition, **Mr Blake** played a significant role as one of the Joint Receivers of the underlying companies of a major Seven Mile Beach hotel and resort that went through a financial restructuring in 2012. More recently, **Mr Blake** has been appointed by the Grand Court of the Cayman Islands as an Interim Administrator over a deceased person's estate. He has also acted as a Controller appointed by Cayman Islands Monetary Authority (CIMA) under the Cayman Islands Mutual Funds Law.

Mr Blake was appointed as a Member effective 1 May 2021 for a four-year term.