

Reengineering The Fight Against Money Laundering



Money laundering involves converting the proceeds of crime into legitimate forms (laundering) in order to conceal their illicit origins. Criminal proceeds are often laundered via the financial system through different types of instruments, vehicles, and sectors such as trusts, “prete-noms”, casinos and gambling, the legal profession, virtual currencies including ‘bitcoin’, amongst many other forms. These operations often involve transactions – both national and international – that can fit in one of three stages, that is, “placement”, “layering” and “integration” in order to disguise the illegal sources of the funds. Let’s not forget that corruption often fuels money laundering. This is why the ICAC has adopted a holistic approach and strategy to wage war against corruption and money laundering by engaging with the different sectors of life. It is for this reason that the ICAC continuously seeks the collaboration and engagement of other stakeholders, including the Police Force, the Financial Intelligence Unit, the financial regulators, the Customs Department, the Prison Service, the Legal Profession, Civil Society and the Media...

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Academics on Anti-corruption, Integrity & Ethics



A one-day symposium on Anti-corruption, Integrity and Ethics for academics was conducted by the ICAC in partnership with the United Nations Office on Drugs and Crime (UNODC) and Tertiary Education Institutions on Thursday 06 April 2017. ICAC targeted academics from all private and public tertiary institutions around the theme, “Promoting Sustainable Development and Strong Institutions: The Key Role of Anti-Corruption Education”. Some 100 participants were present, including 88 local and 12 foreign participants. The Independent Commission Against Corruption (ICAC) organised a symposium for Academics on Anti-corruption, Integrity and Ethics in collaboration with the United Nations Office on Drugs and Crime (UNODC) and Tertiary Education Institutions. The one-day symposium was held on Thursday 06 April 2017 at Le Meridien Hotel, Pointe aux Piments. It was the first time that ICAC targeted academics from all private and public tertiary institutions around the theme “Promoting Sustainable Development and Strong Institutions: The Key Role of Anti-Corruption Education”...

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6 000 students empowered to nurture a culture of integrity



With a view to create greater awareness on corruption among youth and strengthen their ability to act responsibly, an Anti-Corruption Awareness Campaign was conducted by the ICAC in secondary schools, during the period February to June 2017. Around 6000 Lower six students from 90 secondary schools (including Rodrigues) were reached during the campaign which was focused on the theme ‘*Mo Konbat Koripsion pou enn Lavenir Meyer*’. To render this initiative more effective and impactful, the ICAC also launched an online Anti-Corruption Pledge entitled ‘Declaration Against Corruption’ on ICAC website to encourage and motivate Lower six students to demonstrate their commitment in the fight against the social scourge. The pledge has now been extended to all young persons of the Republic of Mauritius. The campaign also comprised the following elements: viewing of a clip, an exposé on corruption and its dangers, the role of youth in fighting corruption, an online Anti-Corruption Quiz Competition and distribution of leaflets and pencils bearing an anti-corruption message.

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Message

from Navin Beekarry, Director General

Fighting corruption and money laundering is the responsibility of each and every one. Edmund Burke said: *"Nobody made a greater mistake than he who did **nothing** because he could **do** only a little"*. This is why the ICAC came up with the slogan: *"Fini koripsyon li ou responsabilite ou si sa"*. For a little bit over a year now, the Independent Commission Against Corruption (ICAC) has been hammering this message throughout its education and prevention campaigns. This slogan is meant as a strong signal that the ICAC wishes to drive to the Mauritian population. Being able to adopt strong legislation and setting up institutions are strong indicators of a serious commitment to the cause. However, for the institutions and legislation to work effectively, requires that everyone must engage. Since a year now, ICAC started introspective exercise and results are visible since the last 6 to 9 months.

Since their inception, the prevention and education programmes of ICAC rely on the collaboration of all stakeholders. To date, the Commission has initiated working groups such as the Public Private Platform against Corruption, Private Sector Anti-Corruption Task Force, Youth Against Corruption, Trade Union Against Corruption and Civil Society Network Against Corruption. New working groups are currently being set up, namely within the entrepreneur and academic communities.

Building coalitions against corruption is a worldwide practice for anti-corruption agencies, recommended by the United Nations Office against Drugs and Crime (UNODC) and the World Bank. Indeed, in a document entitled *"Building Public Support for Anti-Corruption Efforts"* published in 2010, the authors explain that: *"Building coalitions is an effective way to guard against the threat of counter-reform by vested interests. Successful and sustainable reform is vulnerable to capture by such interests."*

The argument is that coalitions are able to mitigate these challenges by: *"providing a shared platform for like-minded, pro-change individuals and groups; leveraging the collective force of their members; focusing the public spotlight on advocacy issues in the public arena"*, among others.

Since a little over a year now, ICAC has taken this approach to the investigative side of its activities. A reengineering in the investigative strategy from a reactive to a proactive stance saw the necessity to collaborate more closely with other law enforcement agencies, namely in money laundering. As such, in June 2017, ICAC took the initiative to unite the the Mauritius Police Force, the Financial Intelligence Unit, the Mauritius Revenue Authority, the Financial Services Commission and the Mauritius Prisons Service in a coordination meeting. The agencies agreed to develop an inter-agency Memorandum of Understanding with broad objectives of better and more effective collaboration and coordination. They also agreed for the coordinating group to be a permanent platform for closer and more effective inter-agency collaboration.

The immediate result of this new investigative strategy at ICAC has seen a significant increase in tracking down money laundering practices in drug-related offences and has lifted the lid, allowing the country to realize how serious the problem really is. However, it is important that we realize that it is everyone's responsibility to engage if the problem has to be addressed frontally.

At ICAC, we believe that everyone should realize that fighting corruption is a patriotic duty and that, as a country, we should all rise above any specific interests, or motivation, in this noble cause of joining forces to fight white-collar crime. As Edmund Burke famously said: *"The only thing necessary for the triumph of evil is for good men to do nothing."* At ICAC, we are engaged in bringing all stakeholders together to help fight the scourge of white-collar crime.

▶ Reengineering the

Money laundering involves converting the proceeds of crime into legitimate forms (laundering) in order to conceal their illicit origins. Criminal proceeds are often laundered via the financial system through different types of instruments, vehicles, and sectors such as trusts, "prete-noms", casinos and gambling, the legal profession, virtual currencies including 'bitcoin', amongst many other forms. These operations often involve transactions – both national and international – that can fit in one of three stages, that is, "placement", "layering" and "integration" in order to disguise the illegal sources of the funds. Let's not forget that corruption often fuels money laundering.

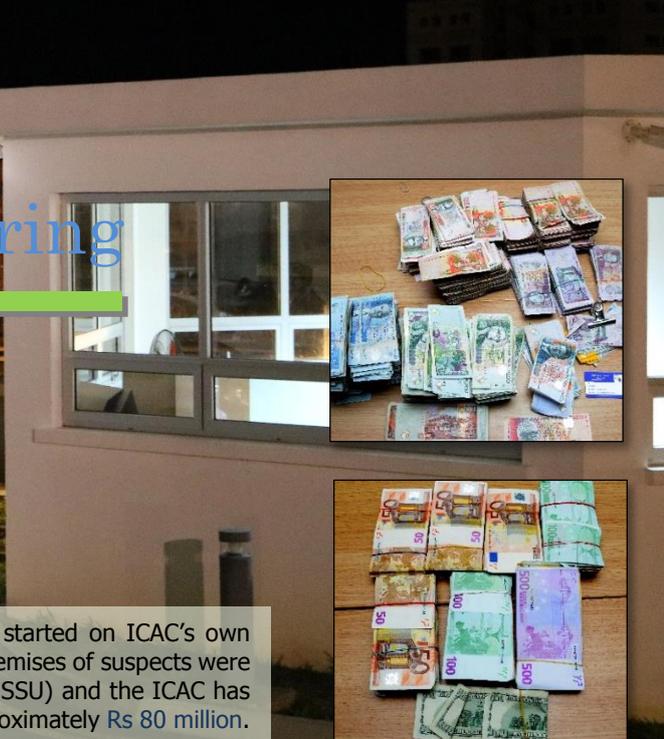
This is why the ICAC has adopted a holistic approach and strategy to wage war against corruption and money laundering by engaging with the different sectors of life. It is for this reason that the ICAC continuously seeks the collaboration and engagement of other stakeholders, including the Police Force, the Financial Intelligence Unit, the financial regulators, the Customs Department, the Prison Service, the Legal Profession, Civil Society and the Media. This collaboration has become more important in the prevailing circumstances, especially with the investigation into drug-trafficking related money-laundering allowed the identification of persons suspected of laundering money, mostly from drug trafficking. As a result, for the period of November 2016 to June 2017, 26 searches of premises of suspects were effected.

While it is true that, since its inception, the ICAC focused more, as a matter of strategy, on corruption investigations, which were initiated on the basis of complaints received at the Commission. Now, the focus is more pro-active and focuses on both corruption and money laundering investigations although we have, in recent times (last 6-9 months) seen a greater focus on drug-related money laundering offenses. The simple logic is that drug-traffickers have to be deprived of the means through which they continue to expand their illicit businesses. Of course, we should also not forget that there is a close and mutually self-supporting link between corruption and money laundering. Hence the need to address them cumulatively in a comprehensive strategy. If we turn the tap of illicit gains off, the criminals will be deprived of the very foundation of their illicit activities.

With the advent of the new management since July 2016, the Investigation Division of the Commission has realised that in the past, in most cases the culprits' illicit gains had generally not been subject to investigation for eventual confiscation. Indeed assets recovery should be one of the pillars of any effective strategy to fight corruption and money laundering investigations.

For instance, since November last year, the Commission has decided to take the bull by its horns and to wage a relentless war against money launderers. In a bid to innovate its strategy, the Commission has moved to a more pro-active strategy of gathering intelligence in order to track down drug-traffickers. Since the adoption of this new strategy, there has been a significant increase in the number of money laundering investigations at the ICAC. From October 2016 to May 2017, the Commission has applied and obtained Attachment Orders on the assets of some 80 persons suspected of money laundering totaling to approximately 80 million MRU (equivalent to 1,540,000 USD).

fight against Money Laundering



For the period of November 2016 to June 2017, the number of investigations started on ICAC's own initiative in terms of Money Laundering has increased by 314%, 26 searches of premises of suspects were effected with the help of other law enforcement agencies (as pictured here with SSU) and the ICAC has been granted Attachment Orders for the assets of some 80 persons, totaling approximately Rs 80 million.

This new strategy is in line with the international trend in fighting corruption and money laundering. Given the transnational nature of money laundering, national governments and the international community have long been working to combat this form of white collar crime. The effectiveness of anti-money-laundering efforts depends on the creation of a coherent system of counter-measures that cuts across borders. The drug-trafficking related money laundering offenses have seen the collaboration of regional forces through exchanges of information and Mutual Legal Assistance agreements among countries involved.

This strategy has also seen, for the first time, the re-grouping of the major Law Enforcement Agencies involved in fighting crime in Mauritius. In mid-June 2017, the ICAC took the initiative to bring together the Mauritius Police Force, the Financial Intelligence Unit, the Mauritius Revenue Authority, the Financial Services Commission and the Mauritius Prisons Service in an effort to develop a joint-strategy for coordination and enhanced effectiveness. The agencies agreed to develop an inter-agency Memorandum of Understanding with broad objectives of better and more effective collaboration and coordination. The MoU will define specific areas of collaboration and coordination. True it is that there has been collaboration between the ICAC and the Police and other agencies on an ad hoc basis. However, the regent need for closer and a more structured approach to coordination and collaboration was felt greater than ever. The agencies also agreed for the coordinating group to be a permanent platform for closer and more effective inter-agency collaboration.

Mauritius has always been at the forefront of adopting new legislation and setting up institutions to address those problems. Since the time when the Anti-Corruption Tribunal Act was adopted in 1984, we have had over 30 years of experience in fighting corruption and money laundering. But times have dramatically changed during those years. Technology has taken over the world of economic and financial development. With rapid and incredible developments in technology and communication, the world has become small and highly interconnected. And the criminals have not slept as well and have made constantly use of those changes to improve their criminal strategies and networks. Today, a money laundering offense can easily be committed via a smart phone with the possibility of being almost untracked. It is, therefore, time for the legislative and

institutional arsenal to be enhanced to meet present day challenges in fighting crime. This requires a harmonization and rationalization of existing set up and approach. With the upcoming overhaul of the corruption and money laundering legislation, presently being finalized, the fight against corruption, money laundering and other financial and economic crimes is expected to gain greater momentum. Since the time when the legislation must be in place that provides the general legal framework and establishes the obligations of financial institutions and other providers of financial services. Such legislation needs to define and criminalize money laundering with appropriate advanced penalties. Financial institutions must make efforts to avoid dealing with criminal elements. Checks have to be made on the identity and legitimacy of clients, especially new clients and those acting on behalf of others. The "know your customer" or "due diligence" obligation is partly a matter of establishing that potential clients are who they say they are, but can also involve elaborate background checks.

In a globalizing world, it can be quite difficult to distinguish when a foreign business is entirely clean and when it is involved in a scam to launder money, although there are circumstances that should prompt close scrutiny, such as when a counterpart comes from a jurisdiction known to have weak AML/CFT systems. Financial institutions must establish systems of identifying and reporting unusual or suspicious transactions. The financial institutions themselves need to be aware of the threat of money laundering, to train their staff to spot activities that raise a suspicion of money laundering, and to have clear processes in place for reporting back to the authorities.

To combat money laundering effectively a general raising of awareness of the issue, appropriate training of regulators and staff in financial institutions to ensure appropriate vigilance, and domestic and international sharing of information on known criminals should be put in place. Institutions such as the Financial Action Task Force (FATF) on Money Laundering contribute importantly to these supportive measures, for example, through the Mutual Evaluation involving the two inter-related components: the technical compliance component and the effectiveness component. The road ahead seems a long one. But at the level of ICAC, strides are being made in that direction.

International Evaluation

Mauritius tested on ESAAMLG and UNCAC compliance

ESAAMLG ASSESSMENT

The Financial Action Task Force (FATF) is the global standard-setter in the fight against money laundering, the financing of terrorism and proliferation of weapons of mass destruction (WMD). Of the three FATF – that is, providing technical assistance to countries, conducting mutual evaluation of countries' compliance with the FATF international standards, and developing AML/CFT typologies, assessing countries' compliance is perhaps the most important. The Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) is the regional FATF-Styled Body (FSRB) that is responsible to carry out the member countries' AML/CFT mutual evaluation.

The FATF 4th Round of Evaluation- presently under way- comprises two stages of evaluating a country's compliance with the FATF standards. First, there is a technical evaluation and second, there is an effectiveness evaluation. The technical evaluation refers to an assessment of the country's legislative and institutional set up and whether, and, if so, to what extent are these in compliance with the FATF standards. The effectiveness stage entails an assessment of whether and to what extent is the country's AML/CFT system effective. Underpinning these 2 stages, however, is the obligation to ensure that the country has developed its own AML/CFT National Risk Assessment (NRA).

One of the key requirements of the FATF Recommendations is for countries to identify, assess and understand the money laundering (ML) and terrorist financing (TF) risks that they are exposed to. It's only when these risks are properly understood that countries will be able to effectively implement anti-money laundering and counter terrorist financing measures to mitigate those risks. This approach, known as the risk-based approach (RBA), is central to the effective implementation of the FATF Standards.

In this context, Mauritius is presently undergoing:

(i) **A National Risk Assessment (NRA)** - to identify and assess its ML and TF risks. Same is being coordinated by the National Committee set up under Part IV of the Financial Intelligence and Anti-Money Laundering Act 2002. The Assessment is being carried out under the guidance of the World Bank. One of the component of the NRA involves assessing to what extent Mauritius is vulnerable to AML/CFT risk areas. A Committee involving various stakeholders at national level is being chaired by the ICAC for an assessment of this component of the NRA. Following a preliminary analysis of information, data and statistics obtained, it transpired that, in the majority of cases of money laundering, the illicit proceeds of crime are derived from drug-related offences, which proceeds are subsequently laundered through different channels.

(ii) **A Mutual Evaluation (ME)**, which is an assessment of Mauritius' compliance with the FATF Standards is being carried out by the ESAAMLG. The first stage of the ME, which involved the technical assessment, took place early this year. In June 2017, ESAAMLG's Assessors were in Mauritius in relation to the second stage of the ME, called

the on-site visit. The Assessors had meetings with various stakeholders in order to identify to what extent Mauritius is effective in combatting ML and TF. The Investigation and the Legal Divisions of the ICAC had 3 half-day working sessions with the Assessors for that purpose where detailed statistics and other relevant information were imparted to the evaluators. The ME Report is due to be finalised in the year 2018.

Officers of the Legal Division of the ICAC attended trainings given by the ESAAMLG pertaining to preparations to be made by relevant stakeholders in Mauritius prior to the on-site visit of the Assessors. In this context, information received during the said training sessions were shared to officers of the Mauritius Police Force and the Mauritius Revenue Authority and they were further explained the importance and purpose of the ME in meetings held at the ICAC. This enabled them to successfully prepare for the on-site visit and to gather required information and statistics with a view to show the effectiveness of Mauritius in the fight against ML and TF.

UNCAC REVIEW

Mauritius is a State party to the United Nations Convention against Corruption (UNCAC) since 2005. The Convention establishes common standards, policies, processes and practices to strengthen anti-corruption efforts at the national level. It also facilitates international cooperation by harmonising the legal and institutional frameworks for law enforcement and establishing cooperative mechanisms.

With a view to improving the capacity of and cooperation between States Parties, a review mechanism has been put in place to assist in the effective implementation of the Convention. In 2013, Mauritius was reviewed with respect to criminalization, Law Enforcement and International Co-operation.

The review process for the implementation of Preventive Measures and Asset Recovery of the UNCAC started in July 2016 where Mauritius was drawn to be peer-reviewed by Mauritania and Panama. In this context Consultative Workshops were conducted in collaboration with the United Nations Office on Drugs and Crime (UNODC) with stakeholders from the private, public and civil society. The objectives of the Workshops were, amongst others, to acquaint stakeholders with the Review Process; facilitate information gathering to complete the Self-Assessment Checklist and identify best practices, challenges and technical assistance needs.

As part of the process, a 3-day country visit was conducted in April 2017 where meetings of a technical nature were held with stakeholders to assess progress made, the gaps in the implementation of the provisions of the UNCAC and the challenges encountered in such implementation, amongst others. The review team comprised officials from the UNODC Secretariat and the reviewers.



Board members, Mr N. Peerun and Ms S. Jhungeer were actively involved in most of the public activities in Rodrigues.

A delegation led by two Board members of the ICAC, Mr N. Peerun and Ms S. Jhungeer, and comprising three ICAC officers were on mission in Rodrigues from 15 to 19 May 2017. This visit was the follow-up of two previous visits, the last of which was led by the Director General of the Commission in December 2016. Pertinent activities held with different stakeholders demonstrate that the Rodrigues jurisdiction remains high on the agenda of the ICAC, whether in terms of anti-corruption education and prevention or in terms of investigation.

The mission, which was facilitated by the Office of the Island Chief Executive, started with a series of meetings. Board members of the ICAC met with the Island Chief Executive, Divisional Commander Police Force and Assistant Superintendent of Prisons. These meetings were helpful in adapting the education and prevention activities to the specifics of the Rodrigues context.

In a bid to maximise the audience reach of the visit and its core messages, the Board members also participated in a radio programme on the Mauritius Broadcasting Corporation station. Focusing on the objectives of the mission and the importance of prevention and education aspects of the fight against corruption, they responded to the questions of the programme geared towards fostering and securing citizen commitment.

Furthermore, around 500 Lower VI students of the six colleges were reached through a one-hour anti-corruption talk. Students were invited to sign up the online anti-corruption pledge 'Declaration Against Corruption'. There was also a keen interest in the online anti-corruption quiz competition. Rectors have undertaken the commitment to set up Integrity Clubs in their respective schools, through which, anti-corruption initiatives would be organised on a yearly basis.

Moreover, one of the core activities of the visit, an Integrity Officers training programme, was held over two half days. Departmental Heads, along with the Island Chief Executive and ICAC Board members, attended the launching of the programme on the first day. The sought objective of this programme is the setting up of Anti-Corruption Committees in the different island Commissions and the development of their respective anti-corruption policies. As follow-up, ICAC

officers will conduct sessions in the different Commissions to impart the objectives of the Public Sector Anti-Corruption Framework (PSACF) and the content of anti-corruption policies.

An empowerment session was held with members of the Rodrigues Regional Assembly. The aim of the session was to create greater awareness on the provisions of the Prevention of Corruption Act 2002 and their roles and responsibilities in the fight against corruption.

Finally, representatives of Civil Society comprising Village Committees, NGOs, Trade Unions, Religious Bodies, Private Sector and other associations attended a working session. The need for civil society engagement was emphasised and the 'Comité Anti-Corruption' project was presented to participants. Participants agreed to the proposal for the setting up of same in Rodrigues during ICAC's next mission to Rodrigues.

In terms of corruption prevention, follow-up exercises on Corruption Prevention Reviews (CPR) were also conducted in the different Commissions. The objectives were to assess the implementation status of recommendations contained in the reports, take cognizance of any constraint in the implementation process and identify any further support required.

Focus of CPRs were as follows:

- Commission for Health and Sports: Procurement of milk, management of overtime allocated to ambulance drivers, quarantine clearance procedures at the marine port and system and procedures for administration of bank nurse scheme;
- Commission for Public Infrastructure, Housing, Transport and Water Resources: Project Monitoring;
- Commission for Social Security and others: Allocation of grant for casting of slab.

The next mission will ensure follow-ups to enhance the engagement of stakeholders in the fight against corruption in Rodrigues.

Symposium

Academics on Anti-corruption, Integrity & Ethics



A one-day regional symposium on Anti-corruption, Integrity and Ethics for academics was conducted by the ICAC in partnership with the United Nations Office on Drugs and Crime (UNODC) and Tertiary Education Institutions on Thursday 06 April 2017. ICAC targeted academics from all private and public tertiary institutions around the theme, "Promoting Sustainable Development and Strong Institutions: The Key Role of Anti-Corruption Education". Some 100 participants were present, including 88 local and 12 foreign participants.

The Independent Commission Against Corruption (ICAC) organised a symposium for Academics on Anti-corruption, Integrity and Ethics in collaboration with the United Nations Office on Drugs and Crime (UNODC) and Tertiary Education Institutions. The one-day symposium was held on Thursday 06 April 2017 at Le Meridien Hotel, Pointe aux Piments. It was the first time that ICAC targeted academics from all private and public tertiary institutions around the theme "Promoting Sustainable Development and Strong Institutions: The Key Role of Anti-Corruption Education".

The symposium was in line with the UN 'Education for Justice - E4J Initiative' under the Global Programme for the implementation of the Doha Declaration. The UN E4J initiative aims to develop and disseminate education materials in UNODC mandated areas of crime prevention and criminal justice across the primary, secondary and tertiary education levels.

In this context, the UNODC delegated Mrs Sigall Horovitz, Crime Prevention and Criminal Justice Officer to act as one of the resource persons and brief participants on the project. The other resource persons were Prof. S. Woolman from Wits University, South Africa, Prof J. Bond from Washington and Lee University, USA, Dr G. Napal, of the University of Mauritius and Dr S. Seetulsingh-Goorah, Director General of the University of Technology, Mauritius. The presentations were followed by an interactive panel

discussion comprising the interveners and Mr Navin Beekarry, the Director General of the ICAC.

The symposium was attended by 88 local and 11 high level academics from the African continent. The main issues discussed during the symposium comprised the importance of teaching ethics and integrity at university level to tackle the problem of corruption and other ills, the methods, tools and good practices for teaching integrity and ethics, the methodology for teaching ethics in a manner that supports individual probity, institutional integrity and the rule of law culture and ways and means of ensuring integrity as a key dimension of quality in the tertiary education sector. The Chief Guest for the occasion was Mr Simon Springett, UN Resident Coordinator and UNDP Resident Representative in Mauritius who delivered the keynote address.

The symposium was an excellent platform for sharing opinions and local and regional experiences on issues such as ethics, integrity and corruption.

Following the Symposium, an Anti-corruption Academic Forum (ACAF) has been set up under the chairmanship of Professor Y. Ramma, Head of Research Unit at the Mauritius Institute of Education and groups representatives of both public and private tertiary institutions in Mauritius. The Forum is set to act as a local and regional platform for periodic meetings where academics can discuss corruption and money laundering issues, ethics education, including good practices, challenges in teaching ethics, as well as research gaps and trends.

The symposium is being used as a springboard for persuading universities to incorporate anti-corruption, anti-money laundering ethics and integrity in the university curriculum as well as triggering research among academics. Given the interest generated among academics, the possibility of organising similar events every 2 years is being explored. Moreover, such events could be made an international event rather than a regional one.

Vanessa Napal, Associate Professor, Faculty of Law & Management, University of Mauritius



"We are gathered today to address an audience of academics and professionals on the subject of anti-corruption initiatives and the topic of integrity in particular. I think this is a good initiative because this shows the will to combat corruption. What we need are concrete measures, empower people and we need the right example to come from the top, at the level of institutions and governance in particular. I think there is a great potential and there is certainly room for improvement, and if we secured the commitment of so many stakeholders today, let's hope it is a signal for a better future. Research is one thing, we can research on an infinite number of topics. What we need right now is training, for the whole population, but especially the heads of institutions. I believe this is where the big question mark remains. If we are to have ethical leadership, we need people to understand what is expected from them if we want to match international standards. We need to raise our standards of ethics."

Philips Sevens, Associate Professor, Criminal Law and Statutory Crimes, University of Pretoria



"I think this event is an excellent initiative, which should be called to be implemented in our own countries on a regional level. I am thinking of integrating what we have discussed in my own courses, by expanding them to integrate components that have been covered today. The idea here is to integrate the subject of ethics and integrity more in the general curriculum, in all subjects, not just as a subject on its own. There is definitely a need for it, especially within the legal profession. I believe students at the undergraduate level should become aware of

this very important aspect. I'm thinking of an integral ethic course perhaps every year, so as to address the ethical issues they will be confronted with later in their practice. The media does play an important role in portraying professionals of the legal professionals in a certain manner. Which is perhaps always the reality, especially in South Africa. Students watching a specific television show will have a misconception of what the legal profession is actually about."

Professor Abraham Waithima, Director, Daystar Leadership and Professional Development Institute, Kenya



"I must admit this was a very well organised symposium, bringing together the minds of academics to think about ethical issues and anti-corruption strategies. As you may know this is something everybody is struggling with. I am involved mainly in the training of corporate leaders, people who come across corruption issues on a day-to-day basis. What I take from here is the idea to set up an ethics course and hopefully lobby it with professional bodies in my country, such as the engineering association, the institute of human resource, and so forth. The idea is to see whether an ethics course is something they can accredit progression points and where the professional body insists that one of the components you need to cover is ethics. Another point this symposium got me thinking on, is the academic side of teaching ethics as part of a curriculum to students. The latter tend to learn it to earn credits, to pass exams and then forget about it. I am thinking on how we can bring students together in the form of ethic clubs. Then blow out this composition of ethics and anti-corruption in a more meaningful way, trying to change the person from the inside, getting them to think of the issues and cost of corruption, not only to themselves, but to the country, and how do they see themselves in that."



The symposium was attended by some 90 local and 11 high level academics from the African continent.

ICAC International Cooperation & Capacity Building

Strengthening regional and international cooperation in the fight against corruption and money laundering has gained momentum in the recent year. The ICAC has, in recent months, had numerous visits from national anti-corruption agencies in the region. These visits touched upon information and knowledge sharing, learning from our anti-corruption experience, seeking technical assistance on anti-corruption matters from ICAC, and even helping out in setting up a national anti-corruption institution. This shows an interest to learn and share experience with the ICAC. It is for this reason that an "International Cooperation and Capacity Building" Unit (ICCBU) was set up in April 2017 to cater for the growing international cooperation events and capacity building of staff. The Unit also aims at putting forward ICAC as a model of excellence in the region, in terms of

the fight against corruption and money laundering and in the promotion of good governance. In terms of international cooperation, the ICAC has always promoted collaboration with anti-corruption and anti-money laundering international organisations, countries' anti-corruption agencies and associations with the aim of mutual learning and sharing of knowledge. As signatory of a number of regional and international conventions, Mauritius plays a significant role in the fight against corruption and has developed numerous links with its counterparts and other international organisations. In 2016-2017, the ICAC had several working sessions/meetings with foreign delegations either on study visits or to explore avenues of collaboration in view of strengthening regional and international cooperation and participated in three international events.

African Union Advisory Board on Corruption

In November 2016, a delegation from the African Union Advisory Board on Corruption (AUABC) comprising its Chairperson and Board Members visited the ICAC to lobby for the ratification of the African Union Convention on Preventing and Combating Corruption by the Mauritian Government. The AUABC and the ICAC agreed to collaborate on future anti-corruption initiatives to be conducted in the region.



Zambia Anti-Corruption Commission

The Board of the Republic of Zambia Anti-Corruption Commission comprising the Commissioner and Deputy Commissioner amongst others visited the ICAC on a one-week study tour in April 2017. One of the main outcomes of the visit was the proposal for the development of a Memorandum of Understanding between Zambia Anti-Corruption Commission and ICAC to strengthen bilateral cooperation.

Ecole Nationale d'Administration de Madagascar

Two delegations of accountants/auditors/students from 'Ecole Nationale d'Administration de Madagascar' (ENAM) had working sessions with ICAC officials in April 2017. They were exposed to mandate, strategy and functioning of ICAC. Discussions were also held on the roles and responsibilities of Accountants/ Auditors in the fight against corruption and money laundering and requested training in financial crime.



African Leadership Network

A working session was also held with representatives of African Leadership Network (ALN) in May 2017. It was agreed to hold working sessions with students and staff of the African Leadership University and collaborate in the organisation of joint regional activities. The ALN also agreed to participate in the commemoration of the International Anti-Corruption Day 2017.

Delegation from Japan

A delegation from Japan paid a courtesy call upon the Director-General of the ICAC in July 2016. The delegation was led by the Chairman of Standing Committee of the House of Representatives and former State Minister to Cabinet Office. Discussions were centered on the fight against cyber-crime and unexplained/illicit wealth, legislative framework and policy and on ICT security.

Other Regional and International Events

UNODC Expert Group Meeting

The ICAC was invited to participate in the UNODC Expert Group Meeting held in March 2017. The Meeting aimed at finalising the development of the Guide in relation to the organisation of 'Model Conferences of State Parties to the UNCAC'.

Eastern and Southern Africa Anti-Money Laundering Group - 33rd Task Force of Senior Officials' Plenary Meeting

ICAC representative attended the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) - 33rd Task Force of Senior Officials' Plenary Meeting from 02 – 07 April 2017 held in Arusha, Tanzania.

Capacity building

The ICAC ensured capacity building of its staff in view of reinforcing capabilities for more effectiveness in the fight against corruption. Various workshops, training programmes, seminars and webinars, both locally and abroad were attended by ICAC staff.

At the local level, officers attended six training courses, namely on Money laundering - Counter terrorism financing, Blockchain Technology-De Risking and Money Laundering in the financial sector (banks and non-banks), the New Code of Corporate Governance – Principle 1-4 and the Sustainability and Integrated Reporting for Excellence in Performance. Mr. T. Bonneau, Professor at the Paris II University Pantheon, Assas, France delivered a talk on the essentials of the European Anti-Money laundering Legislation in March 2017 for the benefit of all investigation staff. On the other hand, the Mauritius Police Force also conducted a training on Police and Criminal Evidence for ICAC Investigators in April 2017.

10 ICAC officers benefitted from various training programmes abroad in the field of anti-corruption and money laundering.

Seychelles Anti-Corruption Agency

In June 2017, the Chief Executive Officer of the Seychelles Anti-Corruption Agency, Mrs. May Da Silva was on a visit to the ICAC to discuss cooperation with the ICAC. Various avenues of collaboration were identified such as providing assistance in the setting up of the Seychelles Anti-Corruption Commission, capacity building programmes for staff of the ACC, sharing of information regarding investigation, and technical assistance to reinforce the operational aspects of ACC Seychelles in terms of policies and practices.



7th Commonwealth Review Meeting of Heads of Anti-Corruption Agencies in Africa

Two senior ICAC officers attended the 7th Commonwealth Review Meeting of Heads of Anti-Corruption Agencies in Africa from held from 29 May to 02 June 2017 in Malawi. The theme of the Meeting was 'Coordinating national action against corruption in Commonwealth Africa' where member countries were called upon to present country initiatives in that endeavour. The Annual General Meeting of the Association of Anti-Corruption Agencies in Commonwealth Africa was also held during that Meeting.

- The Liaison Officers Workshop organised by the Commonwealth Africa Anti-corruption Centre (CAACC) in February 2017.
- The ESAAMLG, Refresher Training Workshop held in April 2017.
- The International Seminar on Financial Investigation in Hong Kong (HK) held in May 2017 on the theme 'Cutting the financial vein of the corrupt'.
- The Managing Exhibits and Proceeds of Crime Course. The course run by the Commonwealth Africa Anti-Corruption Centre (CAACC) in March 2017.
- The Law Enforcement Leadership Development Course. The objective of the course which was run by the U.S. Department of State's International Law Enforcement Academy at the Academy in Gaborone, Botswana from 24 April 2017 to 02 June 2017.
- The Regional Training in Financial Investigations and Asset Recovery. The training was run by Common Market for Eastern and Southern Africa (COMESA) in collaboration with the Basel Institute on Governance in April 2017 in Mahe, Seychelles.

Enhancing the ICAC Legal Division

In an attempt to ensure greater effectiveness in their operations, all the Commission's Divisions are being re-organized to support a more effective delivery of service. This involves a strategy geared towards strengthening its operational and support Divisions. One of the objectives of this strategy is to improve the capabilities of the Legal Division in tendering advice, which has significant implications for the Investigation Division as well as the other Divisions. In addition, the expected outcome is to strengthen the prosecutorial powers and capabilities of the Legal Division.

In this spirit, the Commission recruited 4 new Legal Advisers and 2 Legal Research Officers. The aim is to build a strong and competent team of lawyers to deliver high quality service in tendering legal advice on issues that are pertinent to the Commission's operations. The Legal Division is at the center of the Commission's operations and functions and, as such, required to be fully equipped to deliver.

Legal Advisers of the ICAC are not only called for prosecution of cases. They are also called upon to assume other responsibilities that involve legal issues in one way or another. For example, they often vet Mutual Legal Assistance requests or can get involved in drafting Memoranda of Understanding. One example is the draft MoU that is being prepared to develop working relationship between the ICAC and the Seychelles ACC.

They also have important international responsibilities such as participating in international meetings that have significance for the Commission's work. They often attend and participate in the Esaamg intergovernmental meetings on AML/CFT as well as in international anti-corruption meetings. Two officers of the Commission attended the Heads of Commonwealth Africa Anti-Corruption Agencies held in May 2017 in Malawi. It provided the opportunity for ICAC and its counterparts to review the efforts and strategies in place in other member-countries in view of achieving targets set out under UN Sustainable Development Goals 16.

Presentations by private sector stakeholders demonstrated the need for countries of the Commonwealth countries in Africa to strengthen their legal frameworks and to develop

institutional capabilities to tackle ever growing corruption and abuse of office by public officials. The ICAC explained its new strategy to investigation, which entailed evolving from passive and reactive complaint based inquiries to pro-active intelligence based investigations.

At the domestic level, in the context of the conduct of the Mutual Evaluation Report by the Eastern and South Africa Anti Money Laundering Group held in June 2017, the ICAC engaged with stakeholders such as the Mauritius Police Force and the Mauritius Revenue Authority. Prior to the exercise, the Commission conducted 2 explanatory sessions and apprised the stakeholders of the two inter-related components of the exercise.

Firstly, emphasis was placed on the legal landscape in terms of the existing laws, regulations and other measures in force to combat money laundering and terrorist financing in Mauritius through its various institutional frameworks. Secondly, the aim was to assess the effectiveness of such legislation and measures. The Evaluation was based on an effectiveness assessment of 11 Immediate Outcomes and how the various stakeholders addressed those core issues within the existing the AML/CFT regime.

From information gathering, data analysis and statistics obtained, it stemmed that in the majority of cases of money laundering, the illicit proceeds of crime derived from drug related offences which were subsequently cleansed through the gambling sector.

Furthermore, in order to promote greater efficiency within the Commission and to enhance intra-Division proficiency, officers of the Commission participated in a 40hr training programme on "Operational Skills for Corruption Investigators" held under the supervision of the World Bank's International Corruption Hunters Alliance.

Apart from being a fantastic team-bonding exercise between the Legal Division and the Corruption Investigation Division, the 40-hour training programme proved to be quite a fruitful challenge. It enabled personals of the Legal Division to have a better insight into the intricacies of corruption and money laundering investigation; and vice-versa, for the Investigation Division to have a better grasp on the importance of structured evidence gathering.

IJLS: Lecture on Bitcoin by the Director General

The Director General, Mr Navin Beekarry, was invited by the Institute of Judicial and Legal Studies to deliver a lecture on the Bitcoin phenomenon. Bitcoin is a cryptocurrency first launched in 2009. Although it is considered to provide significant benefits, it still presents serious challenges to the regulatory community. This talk addressed some of the challenges regarding the (mis)use of bitcoin as a new form of payment. During the presentation, Mr Navin Beekarry focused on the criminality aspect of bitcoin and the regulatory landscape for addressing the challenges that the development of bitcoin presents. The presentation looked briefly at the origins and development of bitcoin, what is bitcoin and how it works, its development in an increasingly evolving global financial environment which developed in the aftermath of the 2007-08 global financial crisis, the technological landscape as an enabler of the development of



virtual currencies and the blockchain platform as a facilitator for the growth of bitcoin.

Awareness Campaign

6 000 students empowered to nurture a culture of integrity



With a view to creating greater awareness among the youth about the devastating effects of corruption, and in order to strengthen their ability to act responsibly, an Anti-Corruption Awareness Campaign was conducted by the ICAC in secondary schools, during the period February to June 2017. Around 6000 Lower six students from 90 secondary schools (including Rodrigues) were reached during the campaign which was focused on the theme 'Mo Konbat Koripsion pou enn Lavenir Meyer'.

To render this initiative more effective and impactful, the ICAC also launched an online Anti-Corruption Pledge entitled 'Declaration Against Corruption' on ICAC website to encourage and motivate Lower six students to demonstrate their commitment in the fight against the social scourge. The pledge has now been extended to all citizens of the Republic of Mauritius. The campaign also comprised the following elements: viewing of a clip, an exposé on corruption and its dangers, the role of youth in fighting corruption, an online Anti-Corruption Quiz Competition and distribution of leaflets and pencils bearing an anti-corruption message.

At the event's opening at Dunputh Lallah SSS, Curepipe, Mr Navin Beekarry, Director-General of ICAC, highlighted that "our youngsters – our would-be professionals and leaders of tomorrow- have a crucial role to play in consolidating our pillars of transparency, governance, accountability and integrity. This is the reason why the ICAC strategy pertaining to work with the youth, is geared towards fostering a culture of integrity, increasing their concern against corruption and securing their engagement in the fight against the scourge'. Our guest speaker, Dr Om Nath Varma, Director of the Mauritius Institute of Education, shared his vision of 'integrity' with a view to inspire young persons present to better internalise anti-corruption values and principles. Finally, the representative of the Ministry of Education, Mr Dabee, highlighted the need for Integrity Clubs to be monitored and kept alive by the school and the ICAC for a sustainable change in mindset. The event was

organised in collaboration with the Integrity Clubs of Dunputh Lallah SSS, Hindu Girls College, Curepipe College and Ebène SSS Boys.

According to feedback received, students, educators and rectors were appreciative of the initiative of the ICAC which was of high relevance since it helped students better understand importance of integrity and provided supplementary information as corruption is listed as a theme for the University of Cambridge HSC General Paper (GP) examinations. The campaign has also proved to be successful not only in terms of the number of students reached through face-to-face interactions but also by the momentum generated at the level of all secondary education institutions. ICAC's visits to most of the secondary schools at the same time during a specific period creates greater impact and generates a bigger momentum at the level of the secondary education sector. Similar activity will be organised next year.

Comments from participants

"Sensitising youth in the fight against corruption is key for a better tomorrow. At the very start, they need to understand that better take the toughest road than the straightest one", **Mr Nagessur Gukhool**, Rector, John Kennedy College.

"I found the session to be interactive, convincing, factual and very interesting. I felt that the information provided would be useful in subjects like General Paper and Travel and Tourism. I could view things differently in real life situations", **Mr Guness Balwant Rai**, Lower six student, Universal College.

"Very enriching session for our students of Lower six. Also they have had more information about corruption, anti-corruption measures and ways/means to combat the social evil", **Mrs Ashna Luximon**, Educator/Head of Department and Integrity Club Facilitator, Curepipe College.



Fostering community engagement

The Story behind the Mt Ory Fresco

Driving past every day, one would be forgiven for not taking one's eye off the road to read and reflect on the messages. However, in time and when stuck in traffic, many people have realised that the wall lining the Mt Ory is now adorned with a fresco bearing anti-corruption messages. More than just the rehabilitation of a spot formerly often mistaken for a dumping area, the realisation of the fresco involved a number of people and institutions, namely:

- Mr Gaspard Pascal Jean François and students of Ebene SSS;
- Mrs Sunita Luchmun-Beekharee and students of B.Ramlallah SSS;
- Mrs Samanta Shiw Pursad, Mrs Venita Seechurn and students of Palma SSS;
- Mr Sonal Choytoo and members of Moka Regional Youth Council;
- Miss Raksha Ramloll President, National Youth Council;
- Mr A. Ramloll, Secretary National Youth Council
- Ministry of Youth & Sports;
- Ministry of Environment, Sustainable Development, Disaster & Beach Management;
- Mr S. Bappoo, Principal Youth Officer, Helvetia Youth Centre;
- Ministry of Public Infrastructure, Helvetia;
- The Superintendent of Works and Mr S.Deira of MPI, Helvetia, St Pierre;
- The Officer-in-Charge and Mr A.Autar of the Road Development Authority
- Transparency Mauritius

This fresco stands as a reminder that an anti-corruption initiative mobilises and requires the input of whole groups of people, who when involved in the realisation, become themselves vessels of the messages. Indeed, the images



on the ICAC Facebook page were shared and circulated as the students and other participants tagged themselves and their friends. To date, more than 5 000 persons have engaged with the post. It is a visible example of citizen engagement, among so many others, realised by ICAC so far and a reminder that there every action matters in the fight against corruption.