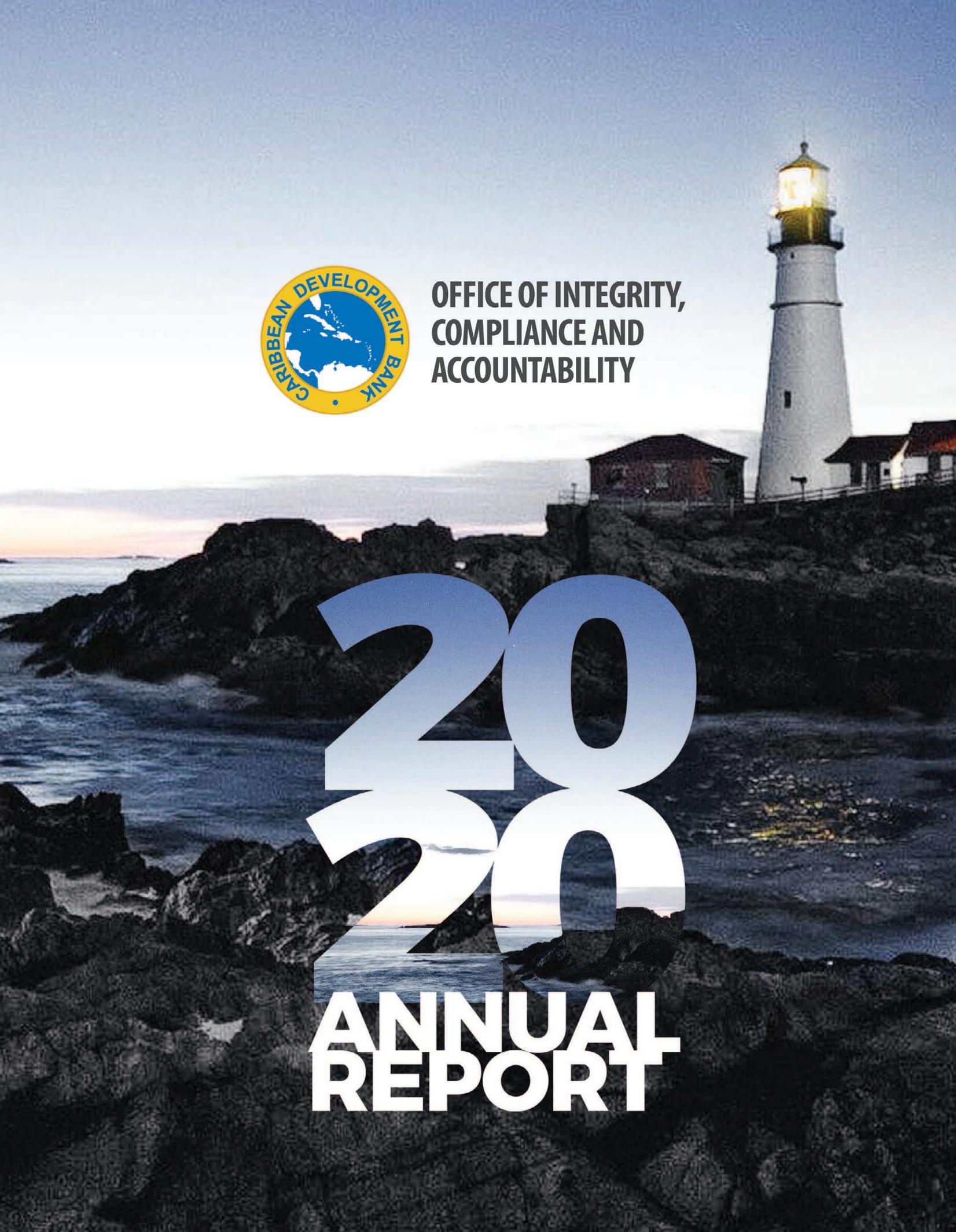




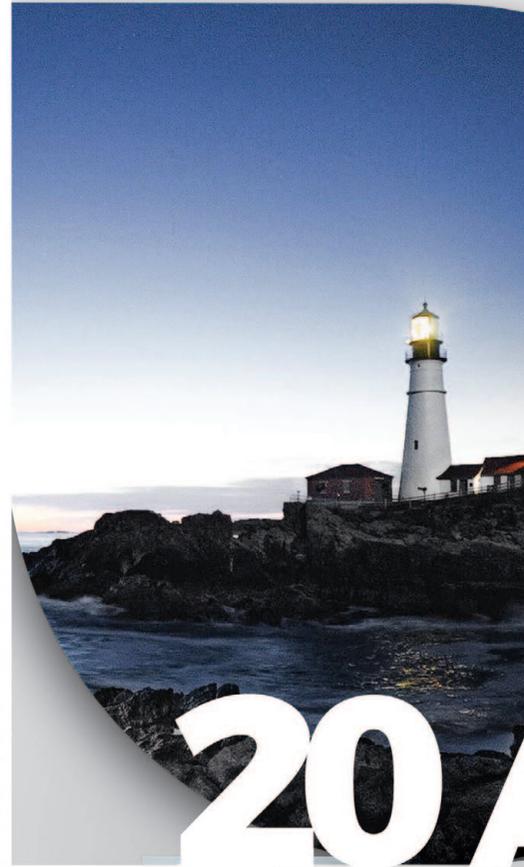
**OFFICE OF INTEGRITY,
COMPLIANCE AND
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WHY THE
ACCOUNTABILITY
COLLABORATION
COMPLIANCE



ANNUAL REPORT



STILEBLOWING
COUNTDOWN
COLLABORATION
COMPLIANCE



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WHISTLEBLOWING
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TOUSSANT BOYCE, PH.D.
Head, Office of Integrity,
Compliance and Accountability

STATEMENT FROM HEAD OF THE OFFICE OF INTEGRITY, COMPLIANCE AND ACCOUNTABILITY

MILESTONES

The year 2020 was CDB's 50th anniversary and ICA's 5th anniversary. This Annual Report, like ICA's first Annual Report in 2016, marks a major milestone in the evolution of the internal governance architecture at the Caribbean Development Bank (CDB) over the last 50 years. This statement provides a perfect opportunity to reflect on the evolution of ICA within the context of CDB's evolution over half a century; an opportunity to reflect on the creation and emergence of ICA as a key part of the Bank's internal governance framework.

Although 2020 started as a year of great optimism, it fell quickly and disappointingly into pessimism and despair as the world battled the deadly Covid-19 pandemic. However, this year of despair ended for ICA with a big and positive bang, with a significant contribution to regional thought leadership.

A YEAR OF CRISIS; A YEAR OF OPPORTUNITY

From its inception in December 2015 through to December 2020, ICA contributed significantly to the Bank's internal governance through its strategy, policies, procedures, and key activities. During 2020, ICA was able to continue to achieve remarkable success because, despite the challenges, 2020 was a year of opportunity to test ICA's resilience and to deliver value to CDB and its stakeholders. ICA had the opportunity to re-focus its work plan which challenged the resilience of its team throughout the crisis. ICA worked throughout the pandemic without pause and with great flexibility to support the Bank's operations and thereby helped CDB to remain firmly on its mission.

During 2020, ICA's strategy also helped CDB to identify and mitigate risks and to deliver value to all of its stakeholders. Consistent with this approach, ICA concluded 2020 with a bang through its conceptualisation and co-hosting with the World Bank, of the inaugural Conference on Corruption, Compliance and Cybercrime in observance of International Anti-Corruption Day 2020, CDB's International Anti-Corruption Week 2020 and in honour of CDB's 50th anniversary. This opportunity to deliver thought-leadership to the region, was well received.

A STRATEGY THAT WORKS

Over the last five years, ICA's strategy to operationalise the Strategic Framework has been carefully conceptualised, clearly articulated, and consistently executed. It has worked very well and although it requires incremental enhancements, resources and support, it does not, at this stage, require fundamental change.

Each of ICA's Annual Reports for the last five years has clear, consistent messages and at times prescient insights about ICA's work in good times and through current and future crises. They highlight one golden thread, that ICA is growing strategically and evolving, while contributing significantly to CDB's internal governance and the ongoing delivery of CDB's mission to reduce inequality, halve extreme poverty by the end of 2025, through supporting inclusive and sustainable growth and promoting good governance.

OVERVIEW

BACKGROUND

The Office of Integrity, Compliance and Accountability (ICA) is an independent office that was established by the Board of Directors (BOD) on December 1, 2015. ICA is mandated to operationalise, manage, and refine the Strategic Framework for Integrity, Compliance and Accountability (Strategic Framework). BOD oversees ICA through its Oversight and Assurance Committee (OAC).

ICA commenced work on the first day of its establishment and full accelerated operationalisation of the Strategic Framework in January 2016.

ORGANISATIONAL STRUCTURE

ICA manages five internal governance functions. These functions are: institutional integrity (fraud and corruption); ethics (staff misconduct); whistleblowing; compliance (money laundering, terrorist financing and financial sanctions) and accountability for environmental and social harm allegedly caused by CDB-financed projects through a Projects Complaints Mechanism (PCM).

The key activities for each ICA function are outlined in Table 1 below.

OFFICE OF INTEGRITY COMPLIANCE AND ACCOUNTABILITY (ICA)

KEY ACTIVITIES FOR ALL FIVE FUNCTIONS

1 

WHISTLEBLOWING

2 

INTEGRITY
FRAUD AND CORRUPTION

3 

ETHICS
CODE OF CONDUCT

4 

COMPLIANCE
AML/CFT

5 

ACCOUNTABILITY
ENVIRONMENTAL AND SOCIAL HARM

	WHISTLEBLOWING	INTEGRITY FRAUD AND CORRUPTION	ETHICS CODE OF CONDUCT	COMPLIANCE AML/CFT	ACCOUNTABILITY ENVIRONMENTAL AND SOCIAL HARM
A	INTAKE AND SCREENING	RISK ASSESSMENTS			
B	PRELIMINARY ASSESSMENTS AND RECOMMENDATIONS				
C	CONFIDENTIAL COMPLAINTS PROCESSING	PREVENTION E.G. INTEGRITY DUE DILIGENCE (IDD), TRAINING	PREVENTION E.G., EMPLOYEE DUE DILIGENCE (IDD), TRAINING	PREVENTION E.G., CDD, FINANCIAL SANCTIONS MONITORING, TRAINING	ELIGIBILITY ASSESSMENTS AND REGISTRATION
D	PROTECTION FROM RETALIATION	INTEGRITY INVESTIGATIONS	ETHICS INVESTIGATIONS	COMPLIANCE INVESTIGATIONS	PCM INVESTIGATIONS
E	ESCALATION AND REFERRALS (INTERNAL AND EXTERNAL)	NOTIFICATIONS AND REFERRALS (INTERNAL AND EXTERNAL)	ESCALATION AND INTERNAL REFERRALS	EXTERNAL REFERRALS AND REMEDIATION	DISPUTE RESOLUTION
F	RESOLUTION	SANCTIONS AND SANCTIONS APPEALS	RECOMMENDATIONS TO HRD FOR DISCIPLINARY ACTION	RECOMMENDATIONS FOR REMEDIAL ACTION	COMPLIANCE REVIEW
G		ISSUANCE OF PROCEDURES, GUIDELINES AND ADVISORIES			
H		ENFORCEMENT			
I	MONITORING COMPLIANCE				
J	IN-REACH AND OUT-REACH BY ICA OR IN COLLABORATION WITH OTHER IFIs				

KEY

PREVENTION	INVESTIGATION AND SANCTIONS	ADVISORY	MISC.
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Table 1: ICA's Key Activities January to June 2020

These five functions which are typically managed by multiple independent offices in multilateral development banks (MDBs) and IFIs. However, for CDB and pursuant to the Strategic Framework, all five of these functions are converged into ICA, a single office. Organisationally, ICA is a convergence of an independent integrity office, an investigative office, an ethics office, a compliance office, a whistleblower intake office, and an independent accountability mechanism.

ICA'S OPERATIONALISATION STRATEGY

ICA's operationalisation strategy is to use an approach that is: (a) risk-based; (b) proportional; (c) strategic, to prioritise the prevention of violations and whenever warranted, the conduct robust independent investigations; (d) incremental; and (e) phased. This strategy enables the office to evolve in a manner that is tailored to the risks faced by the Bank and the Bank's operating environment, needs, size and resources.

"Someone's sitting in the shade today because someone planted a tree a long time ago."

- Warren Buffett

The unique convergence of ICA's functions and this strategy enables ICA to take a holistic, innovative, balanced, synergistic, and agile approach to delivering its broad mandate while learning from other offices and best practices. In summary, ICA's model and strategy adds efficiency, breadth, and resilience to CDB's internal governance framework. This operationalisation strategy which was developed in 2015-16 has worked successfully and was used during 2020.

IMPACT OF COVID-19 ON ICA'S OPERATIONALISATION STRATEGY

ICA's work continued successfully during 2020 with some challenges because some significant aspects of ICA's work plan were impacted adversely by Covid-19. For instance, ICA's plan to conduct in-person investigative interviews and undertake joint outreach with other MDBs in five BMCs as planned were cancelled or all postponed indefinitely.

ICA experienced a decrease in integrity complaints and investigative traffic. However, requests for ICA's assistance continued uninterrupted with an unexpectedly higher number of requests to aid with enhanced integrity due diligence (IDD) activities. ICA also paid special attention to relevant risks likely to arise from Covid-19, for example, increased fraud and corruption, adjusted its risk radar and advised the Bank's management and staff accordingly. Covid-19 also created opportunities for ICA to continue to leverage more technology in its risk surveillance, risk assessment, development of due diligence tools, investigations, and outreach.

ICA'S RISK RADAR FOR Q1 AND Q2 | 2020

For internal risk assessment related to its functions, ICA routinely identifies and seeks to mitigate proactively and reactively, any vulnerabilities relevant to ICA's mandate in the Bank's internal systems and external operations. ICA also reviews and integrates information and learning from the work of other offices in the Bank. Figure 1 below illustrates the key vulnerabilities on ICA's Risk Radar for 2020.



Figure 1: ICA's Risk Radar as of June 2020

RISK SURVEILLANCE AND ISSUES TRACKER

ICA shares weekly risk insights and learning outcomes with management and staff that sometimes covers specific areas of the Bank's operations. Depending on the risks identified, ICA notifies the President's Office, or Vice-Presidents' Offices and Corporate Communications Unit and monitors proactively the issues identified.



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PILLAR I: WHISTLEBLOWING, ETHICS, AND INTEGRITY

Whistleblowing: Intake Statistics
Prevention: Integrity Due Diligence (IDD) Toolkit
Prevention: IDD SearchBot
Prevention: Internal Advisories for Institutional Integrity and Ethics

INVESTIGATIONS

Investigations: Resolution Statistics

PILLAR II: COMPLIANCE

Counterparty Due Diligence
Advice on Financial Institutions holding Designated Accounts
Compliance Advice and Guidance
Compliance-related training

PILLAR III: ACCOUNTABILITY

PILLAR IV: EXTERNAL COLLABORATION

External Collaboration – Cooperation and Information Sharing





PILLAR I: WHISTLEBLOWING, ETHICS, AND INTEGRITY

WHISTLEBLOWING: INTAKE STATISTICS

ICA manages the Bank's Whistleblower System which has six reporting channels: a globally accessible hotline which facilitates collect calls; a globally accessible online webform which together with the hotline is linked directly to ICA's case management system; emails; telephone; mail; and office visits.



Table 2: Whistleblower System intake including Conflict of Interest Submissions during 2020

During 2020, ICA received 169 screened contacts through the Whistleblower System as illustrated on Table 2 below which included conflicts of interest submissions and attestations from members of staff.

PREVENTION

Prevention: Integrity Due Diligence (IDD) Toolkit

Consistent with its operationalisation strategy to prioritise prevention, ICA launched the IDD Toolkit in 2018 and worked to promote the use of the IDD Toolkit and to conduct IDD. As of June 2020, the IDD Toolkit is being used by frontline staff in both the Operations and Corporate Services Areas of the Bank.

During 2020, ICA conducted at least 20 due diligence investigative activities, in particular enhanced due diligence or EDD exercises.

PREVENTION: IDD SEARCHBOT

During 2020, ICA contributed to the creation by the Information and Technology Solutions Division of an IDD SearchBot Tool to enable members of staff across the organisation to conduct IDD. The tool is a search engine which enables CDB staff members to conduct automated web searches by simultaneously searching multiple international and regional sanctions lists, ICA's internal advisories list of temporarily suspended individuals and entities, and open web sources. Its automated search integrates a list of

commonly used integrity risk-related key words. Finally, the tool facilitates the secure warehousing of information and creates an auditable trail, which enables reporting and risk mitigation.

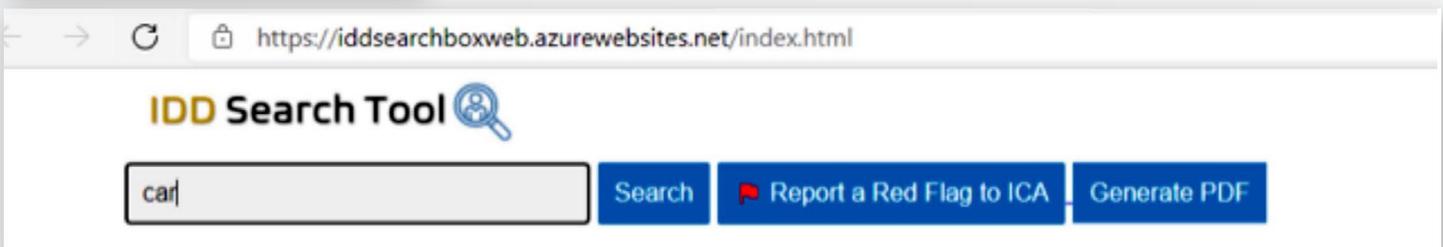
This tool will be enhanced and extended in 2021 to all other areas of the Bank, as part of ICA's IDD Toolkit.

The creation of this tool is key to ICA's continued use of information technology solutions and the Bank's current transformation process to deliver value to the Bank's internal and external stakeholders.

It exemplifies ICA's thrust during 2020 to use more technology to continue to promote and embed good practices for prevention of financial loss and reputational damage and to ensure that all frontline staff are equipped to protect the Bank by using the tools in the IDD Toolkit and their own good judgment.

PREVENTION: INTERNAL ADVISORIES FOR INSTITUTIONAL INTEGRITY AND ETHICS

ICA issues internal advisories to all staff as part of its work to proactively prevent the occurrence or recurrence of integrity and ethics violations. During 2020, ICA issued three advisories related to institutional integrity issues. On April 15, 2020, ICA also issued a Special Advisory titled 'Heightened Fraud Risks During Covid-19' which was updated on August 13, 2020.





INVESTIGATION

Investigations: Resolution Statistics

ICA conducted a wide range of investigative activities during 2020. Figure 3 below displays statistics of matters managed by ICA over the last five years which numbered 22 in 2016, 31 in 2017, 47 in 2018, 43 in 2019 and 55 in 2020, which included 32 investigations and 23 IDD activities.

INVESTIGATIVE MATTERS MANAGED FROM 2016-2020

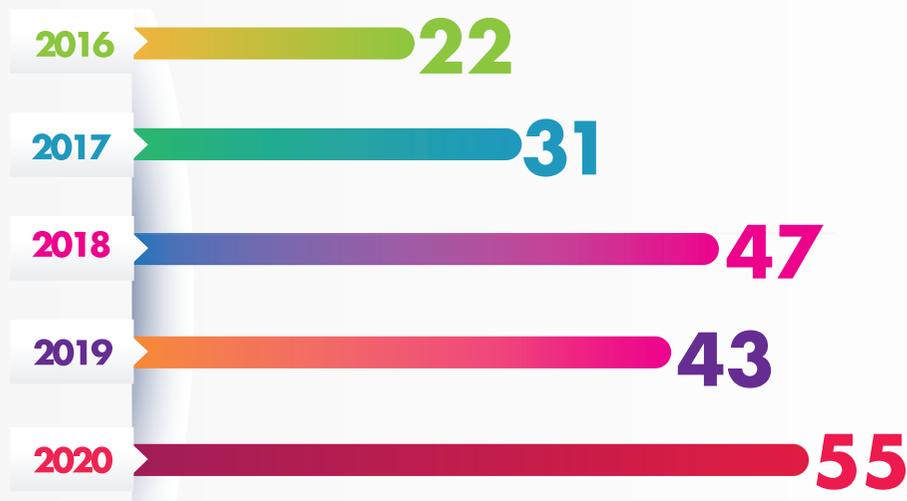


Figure 3: ICA Investigative Matters (January 2016 - December 2020)

During 2020, ICA also commenced receipt and review of conflicts of interest submissions through its online Conflicts of Interest portal ahead of its full launch in 2021, as shown on Table 3 below.

INVESTIGATIVE ACTIVITIES	INT	ETH	COMP	ACCT	TOTAL
CASES CARRIED OVER 2019 FROM	10	1			11
NEW CASES IN 2020	13	6	1	1	21
IDD - INVESTIGATIVE ACTIVITIES	21	1			23
TOTAL					55

Table 3: Investigative matters managed from January – December 2020



PILLAR I: WHISTLEBLOWING, ETHICS, AND INTEGRITY

Table 4 below provides a sample of concerns, complaints and IDD investigative activities conducted during 2020. These examples are not exhaustive of the nature and number of investigative activities undertaken by ICA during this period.

TYPE	SAMPLE COMPLAINT / ALLEGATIONS / ISSUE / CONCERN / SCENARIO	STATUS
CORRUPT PRACTICE	Whether a procurement process was possibly compromised and corrupted by interference from a government official to deny a bidder.	CLOSED UNSUBSTANTIATED PART, REFERRED TO PRC
CORRUPT PRACTICE	Whether systemic corrupt practices evident in procurement practices in a BMC.	ONGOING
CORRUPT PRACTICE	Whether conduct of senior public officials in a BMC where allegations of corruption were made warrant investigations for integrity and reputational risks to CDB.	CLOSED NO FURTHER INVESTIGATION WARRANTED
CORRUPT PRACTICE	Whether public officials in a BMC favoured a bidder and whether there were any integrity and reputational risks to CDB.	CLOSED NO FURTHER INVESTIGATION WARRANTED
FRAUDULENT AND COLLUSIVE PRACTICES	Whether multiple affiliated companies provided false and misleading information about their status and connections and colluded to enable multiple bids on various CDB projects.	ONGOING TEMPORARILY SUSPENDED
FRAUDULENT PRACTICE	Whether a bidder made a false declaration about its suspension or termination on a previous project for violation of environmental and social safeguards.	ONGOING
FRAUDULENT PRACTICE	Whether a bidder submitted a false letter of credit.	ONGOING FURTHER INVESTIGATION WARRANTED
FRAUDULENT PRACTICE	Whether rejection of an unsigned bid bond was unfair and unjustifiable and constituted a fraudulent practice.	COMPLETED NO FURTHER INVESTIGATION WARRANTED
ACCOUNTABILITY FOR E&S HARM	Whether the external security lights on a CDB-funded project created social and environmental harm to a neighbour living adjacent to the project.	COMPLETED

Table 4: Sample Concerns, Complaints and IDD Dealt with by ICA during 2020



Table 5 below contains a summary of some IDD matters reviewed by ICA during 2020.

TYPE	SMALL SAMPLE OF EDD MATTERS	STATUS
INTEGRITY DUE DILIGENCE - OPERATIONS AREA	<ul style="list-style-type: none"> • EDD of a firm being engaged as a likely recipient of CDB’s funds to procure supplies for regional governments under a contract funded by CDB • EDD of a consultant on an Energy Project • EDD of bidders for a port project • EDD of bidders for a hotel project • EDD of sponsors of a shipping project • EDD of sponsors of a geo-thermal energy project • EDD of contractor for a renewable energy project • EDD of a company in which CDB holds equity • EDD of a financial services intermediary • EDD of consultants on multiple projects including consultants providing supervision services for a school • EDD of multiple bidders for a water and sanitation project 	COMPLETED
INTEGRITY DUE DILIGENCE - CORPORATE SERVICES AREA	<ul style="list-style-type: none"> • EDD of multiple financial consultants and service providers to CDB’s Finance Division • EDD of an information technology services provider 	COMPLETED

Table 5: Small sample of Enhanced Integrity Due Diligence matters dealt with by ICA during 2020

INVESTIGATIONS: PROCEDURES

During 2020, ICA with assistance from the Legal Department completed drafts of its Investigations and Sanctions Manuals. The manuals will be submitted to Management for notification and consultation following which they will be finalised and implemented.



PILLAR II: COMPLIANCE

COUNTERPARTY DUE DILIGENCE

During 2020, ICA conducted counterparty due diligence (CDD) for Know Your Customer (KYC) information collection on our financial counterparties and conducted compliance checks on other entities that were engaging with the Bank.

ICA conducted initial CDD on all the top primary financial institutions with which CDB has existing correspondent banking relationships as of January 2020. ICA has also supported the Bank's Finance Division in its establishment and maintenance of correspondent and other banking relationships with new financial counterparties by providing guidance and advice about their requirements.

ADVICE ON FINANCIAL INSTITUTIONS HOLDING DESIGNATED ACCOUNTS

ICA has conducted multiple CDD on financial institutions at which designated accounts are to be held to assist with disbursement of CDB financing for projects.

COMPLIANCE ADVICE AND GUIDANCE

ICA also assisted various departments with guidance and advice on Integrity and Compliance-related terms in agreements. In particular, ICA assisted the Projects Department and the Legal Department with reviewing compliance provisions in draft finance and other agreements and memoranda of understanding being negotiated between CDB and other MDBs and funding agencies.

COMPLIANCE-RELATED TRAINING

ICA also participated in training provided by the Association of Certified Anti-Money Laundering Specialists (ACAMS), in particular the ACAMS 2nd Annual AML and Financial Crime Conference, the Virtual Caribbean Summit and the ACAMS 24+ Summit Global 2020.

In February, the Head, ICA provided training to participants from across the Caribbean as a speaker on Financial Sanctions training to attendees at the ACAMS Anti-Financial Crime Symposium 2020 and also moderated a panel on the ACAMS 2nd Annual AML and Financial Crime Conference.



PILLAR III: ACCOUNTABILITY

ACCOUNTABILITY: PROCEDURES

During 2020, ICA engaged with its MDB counterparts and participated in activities to help inform its work on finalisation of the Accountability Procedures for its Projects Complaints Mechanism.

ACCOUNTABILITY: TRAINING

ICA facilitated the training of six CDB members of staff from the Bank's Social Sector Division and Environmental Sustainability Unit. The training focused on 'Strengthening Grievance Redress Mechanisms.' It was funded by the Green

Climate Fund and delivered by the Consensus Building Institute of Harvard/MIT.

Each member of staff who completed the course received a certificate from CBI Harvard /MIT. The course had nine modules that covered the history, design, operations and role of grievance redress mechanisms like ICA which operate at the organisational level. It also covered grievance redress mechanisms at the projects level which is directly relevant to the work of each of CDB member of staff who attended the training.



PILLAR IV: EXTERNAL COLLABORATION

EXTERNAL COLLABORATION – COOPERATION AND INFORMATION SHARING

During the period under review, ICA collaborated with:

- (a) independent offices in other MDBs, on two separate integrity-related investigative activities;
- (b) the Ethics and Business Conduct office (EBC) of the World Bank and CDB's Human Resources Division (HRD) on revising the Bank's Code of Conduct for staff;
- (c) the EBC for ICA's application to join the Ethics Network of Multilateral Organisations (ENMO). ENMO is an annual forum for senior personnel from ethics office of multilateral organisations to engage and share innovative insights on common challenges arising from their work on institutional ethics; and
- (d) a global financial integrity organisation to engage with ICA through a memorandum to assist with the conduct of risk-based approach workshops, that will seek to engage a wide array of entities, such as governments, banks, financial institutions, and designated non-financial businesses and professions (DNFBPs) in discussions surrounding effective AML/CFT efforts for the Caribbean.





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INREACH:

TRAINING, CONSULTATIONS AND COLLABORATIONS

Mandatory Training 2020 – All Functions and Induction Training
ICA's Engagement with the Staff Association

RESOURCES:

EXTERNAL CONSULTANTS – BUILDING ICA ROSTERS

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OUTLOOK FOR 2021

APPENDIX 1



INREACH: TRAINING, CONSULTATIONS AND COLLABORATIONS

MANDATORY TRAINING 2020 – ALL FUNCTIONS AND INDUCTION TRAINING

ICA is mandated by its Terms of Reference to undertake all steps to ensure prevention and detection of fraud and other integrity and ethics violations. Training is a key pillar of successful prevention. Management of the Bank has the primary responsibility for ensuring that all members of staff are properly trained.

ICA is responsible for delivering effective training on ICA-related issues to staff as part of its strategy to prioritise prevention.

During 2020, ICA conducted mandatory training and awareness for all staff including as outlined in Appendix 1 below. The chart in Figure 4 below illustrates the results of ICA's training effectiveness tests from 2017 to mid-2020 which was done using an e-quiz.

ICA'S ENGAGEMENT WITH THE STAFF ASSOCIATION

ICA met with the new executive of the CDB Staff Association to discuss arrangements for collaboration for the benefit of members of staff. ICA has conducted such meetings since 2016. The 2020 meeting was productive and included agreements that the Staff Association will continue to look for opportunities to support ICA's training and also that ICA will implement the request by the Staff Association to certify staff training. ICA arranged for certification of staff training through the Bank's Learning Management System which will take effect at ICA's next mandatory all staff training in February 2021.

CONTRIBUTIONS TO CDB TRANSFORMATION PROGRAMME

ICA collaborated with representatives from the CDB Transformation Office to contribute to process improvements to the conduct of IDD by Operations staff.

ETHICS-RELATED TRAINING

ICA and Human Resources participated in training provided by NAVEX Global on Conflicts of Interest as part of an initiative to revise the Code of Conduct for CDB staff.

INTEGRITY-RELATED KNOWLEDGE SHARING

ICA participated in a Colloquium bringing together the Sanctions departments of several MDBs hosted by the Office of Suspension and Debarment of the World Bank which contributed to knowledge sharing among MDBs about the latest innovations in the world of investigations and sanctions.

CDB STAFF ICA TRAINING QUIZ RESULTS 2017-2020

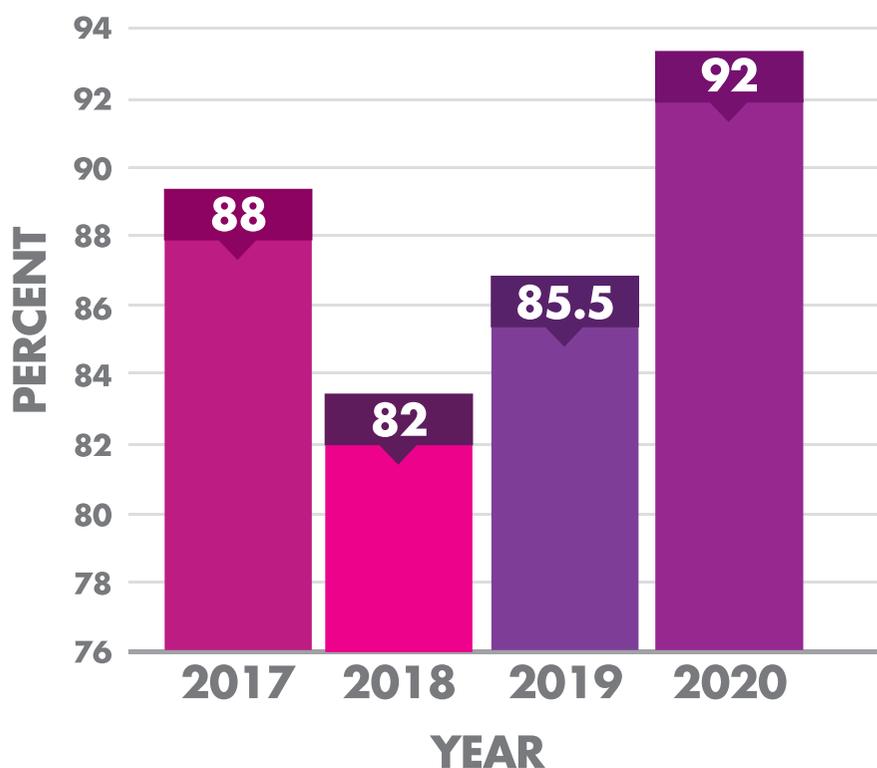


Figure 4: ICA Training Effectiveness Testing (2017-2020)

RESOURCES: EXTERNAL CONSULTANTS – BUILDING ICA ROSTERS

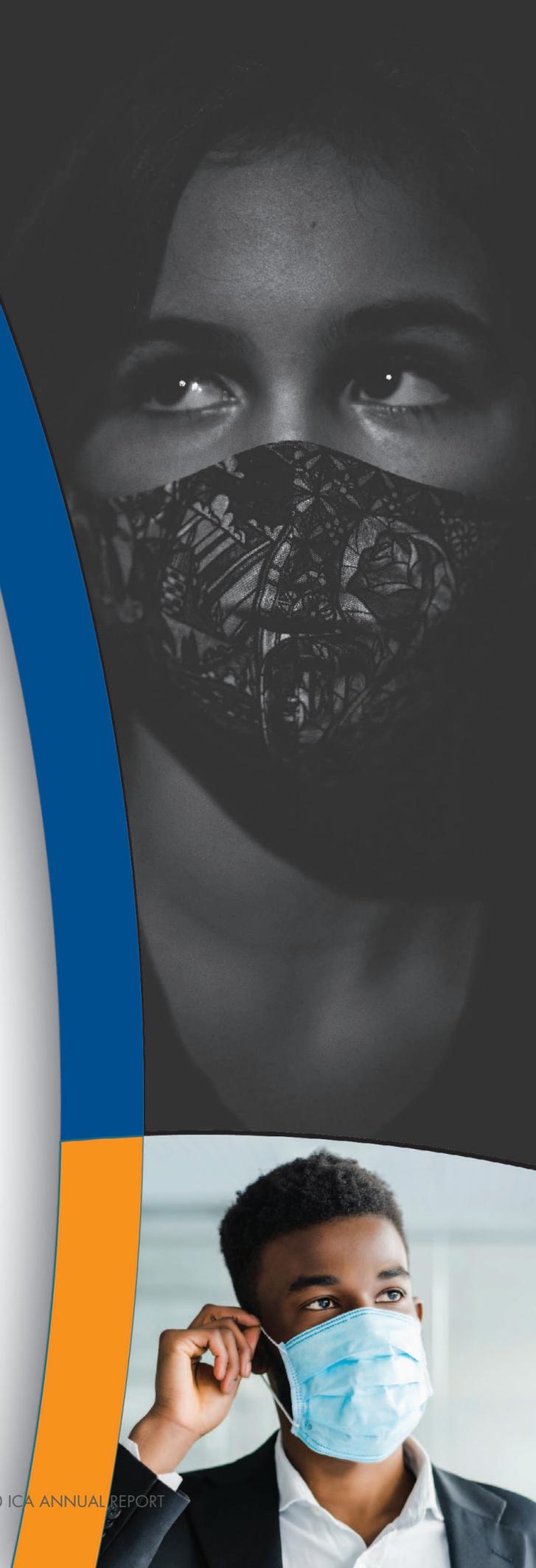
During 2020, ICA advanced substantially its work on the establishment of rosters of ad hoc consultants (ICA Rosters) to supplement ICA’s resource pool with relevant pre-qualified external consultants. Roster pools were filled for the following roles as shown on the Table 6 below and will continue to be filled as necessary:

ROSTER ROLES

- (a) Integrity Due Diligence Specialists
- (b) Integrity Investigators
- (c) Compliance Due Diligence Specialists
- (d) Compliance Investigators
- (e) Sanctions Officers
- (f) Sanctions Appeal Officers
- (g) Accountability – Subject Matter Experts
- (h) Accountability – Dispute Resolution Specialists
- (i) Investigative Administration – general admin, translators, and transcriptionists

Table 6: List of ICA Rosters

The first cohort of consultants available for the Rosters includes a diverse, qualified array of professionals from Italy, Brazil, United Kingdom, Cayman Islands, Jamaica, Trinidad and Tobago, Canada, and Colombia.



ICA'S CONTRIBUTION TO CONFERENCES, MEETINGS AND OUTREACH

Caribbean Anti-Financial Crime Symposium and ACAMs Financial Crime Conference

In early February, the Head, ICA participated as a speaker on a Financial Sanctions Panel the ACAMs Anti-Financial Crime Symposium in Port of Spain, Trinidad and Tobago and moderated a panel on the ACAMs 2nd Annual AML and Financial Crime Conference in December 2020.

OUTREACH

In late February, ICA contributed to the Bank's Projects Department, Technical Cooperation Division's outreach in Antigua and Barbuda during the launch of the EU Standby Facility.

Planned joint integrity outreach exercises with the IDB's Office of Institutional Integrity in three countries were unable to be facilitated in 2020 due to Covid-19.

IAMnet Meeting

IAMNET MEETING

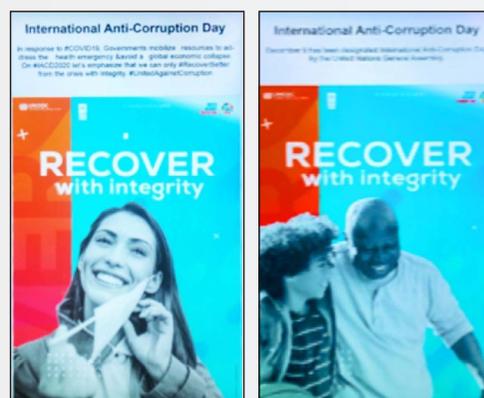
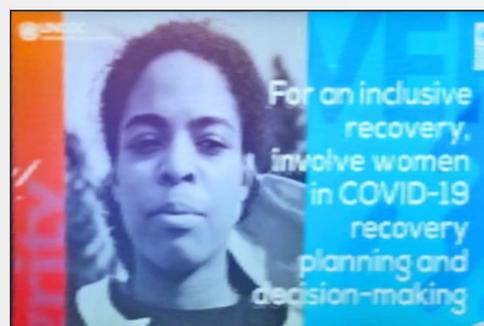
On September 23 and 24, 2020, ICA attended the virtual XVII Annual Meeting of the Independent Accountability Mechanisms (IAMnet).

GUEST LECTURE ON GOVERNANCE TO UWI STUDENTS

In December, the Head, ICA delivered a guest lecture to graduate students of the University of the West Indies, Mona Campus. The subject of the lecture was "Internal Governance: Building a Modern Sustainable Strategic Framework for Integrity, Compliance and Accountability".

CDB'S OBSERVANCE OF ANTI-CORRUPTION WEEK 2020

International Anti-Corruption Day was observed globally on December 9, 2020. ICA led CDB's observance of Anti-Corruption Week 2020, December 7-11.



ICA's work in this regard included a video series displayed on CDB's information kiosks for staff to view as shown in the pictures above. It also included a series of voluntary training sessions on corruption and about the nexus between corruption and money laundering and cybercrime which was delivered through ICA's signature 2020 training event, the inaugural Caribbean Conference on Corruption, Compliance and Cybercrime.

CONFERENCE ON CORRUPTION, COMPLIANCE AND CYBER-FRAUD (3Cs) IN HONOUR OF CDB'S 50th ANNIVERSARY

ICA conceptualised and led delivery of the Caribbean Conference on Corruption, Compliance and Cyber-crime (3Cs) on December 7-8, 2020. 3Cs was co-hosted with the World Bank's Integrity Vice Presidency in honour of CDB's 50th anniversary, and also in observance of International Anti-Corruption Day 2020 and CDB's Anti-Corruption Week 2020.

The conference was designed to convene thought-leaders from the Region and across the world to share and discuss new challenges and solutions to combatting corruption, money laundering, and cyber-crime, particularly cyber-fraud in the Caribbean. It educated global stakeholders, particularly CDB beneficiaries, on cutting-edge approaches to identifying and mitigating relevant risks and drivers. It was a free virtual conference that was globally accessible to everyone in the Region, from policymakers to students. It provided an opportunity for CDB to impact the Region positively on these issues and to reach a wide array of beneficiaries and stakeholders.

Speakers, moderators, and other contributors included experienced global anti-corruption practitioners, anti-money laundering specialists, cyber-crime professionals, development bankers, policy makers, regulators, law enforcement personnel, and private sector players and academics from within and outside of the Region. Notably, the President of CDB delivered the Welcome remarks followed by the Keynote Address by the Minister in the Ministry of Economic Affairs and Investment of Barbados.

Three Attorneys General from The Bahamas, Jamaica, and Guyana were hosted by the Governor of the Eastern Caribbean Central Bank in a virtual Roundtable and the Heads of Integrity Offices at the World Bank, CDB and IDB were hosted in a virtual Fireside Chat. In addition to staff from CDB and the World Bank, ICA collaborated with several international and national organisations and their staff to present on 3Cs panels. Contributors were drawn from the IDB, the Federal Bureau of Investigations, University of the West Indies, Transparency International among others. The Conference was well supported by the attendance of staff and the Office of the Bank Secretariat, Corporate Communications Unit and the Information Technology and Solutions Division.

The valuable insights from a diverse agenda of topics were delivered expertly and the agenda itself was very well received. The Conference agenda was devised to increase understanding of the nexus between corruption, money laundering compliance, and cybercrime. It also increased understanding of the impact of corruption on emerging economies and ways to strengthen institutional and individual responsiveness.





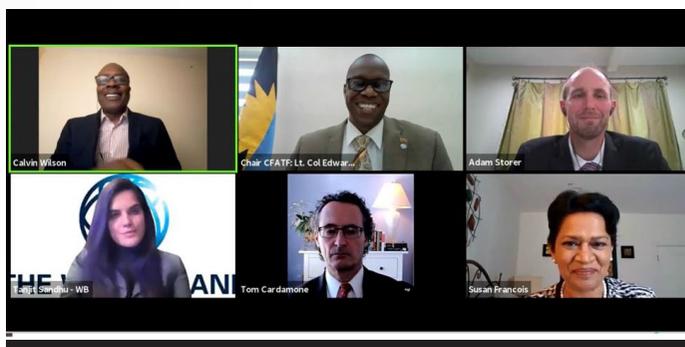
“Education is the most powerful weapon which you can use to change the world.”

- Nelson Mandela

ICA’s novel approach to this kind of virtual thought leadership on corruption was to emphasise inclusivity and diversity, by bringing under-represented groups to the table to discuss mitigating money laundering, corruption and cybercrime. For 3Cs, such groups included youth, women, and the media who are not typically at the forefront of these topics but who can play a critical role in identifying and implementing solutions.

3Cs, with over 800 attendees, 60 speakers, and 2,800 session views was rated by key stakeholders as a highly successful virtual event. It received very positive feedback from contributors and attendees including commendations

for its delivery of valuable thought leadership to the Region. 3Cs has been described by presenters and attendees as “one of the most interactive and thought-provoking regional conferences of 2020” ...“quite informative” and “an excellent initiative” that was used to “educate, raise awareness, and deepen understanding of public policy issues that shape our socioeconomic circumstances in this region.” Some thought that “the organisation was perfect” and that ICA should be commended for “running such a well-organized and professional event.” Others commended “ the organization, the professionalism, and the overall good vibe throughout the process.”



OUTLOOK FOR 2021

“After climbing
a great hill, one
only finds that
there are many
more hills to
climb.”

Nelson Mandela

ICA is looking forward to exploiting the opportunities that will arise during 2021. In 2015, the seeds for ICA’s success were planted and have been nurtured over the first five years of ICA’s existence. ICA’s vision and plans for the next five years will be impacted by the extent to which CDB transforms itself and the risks that will arise in the future.

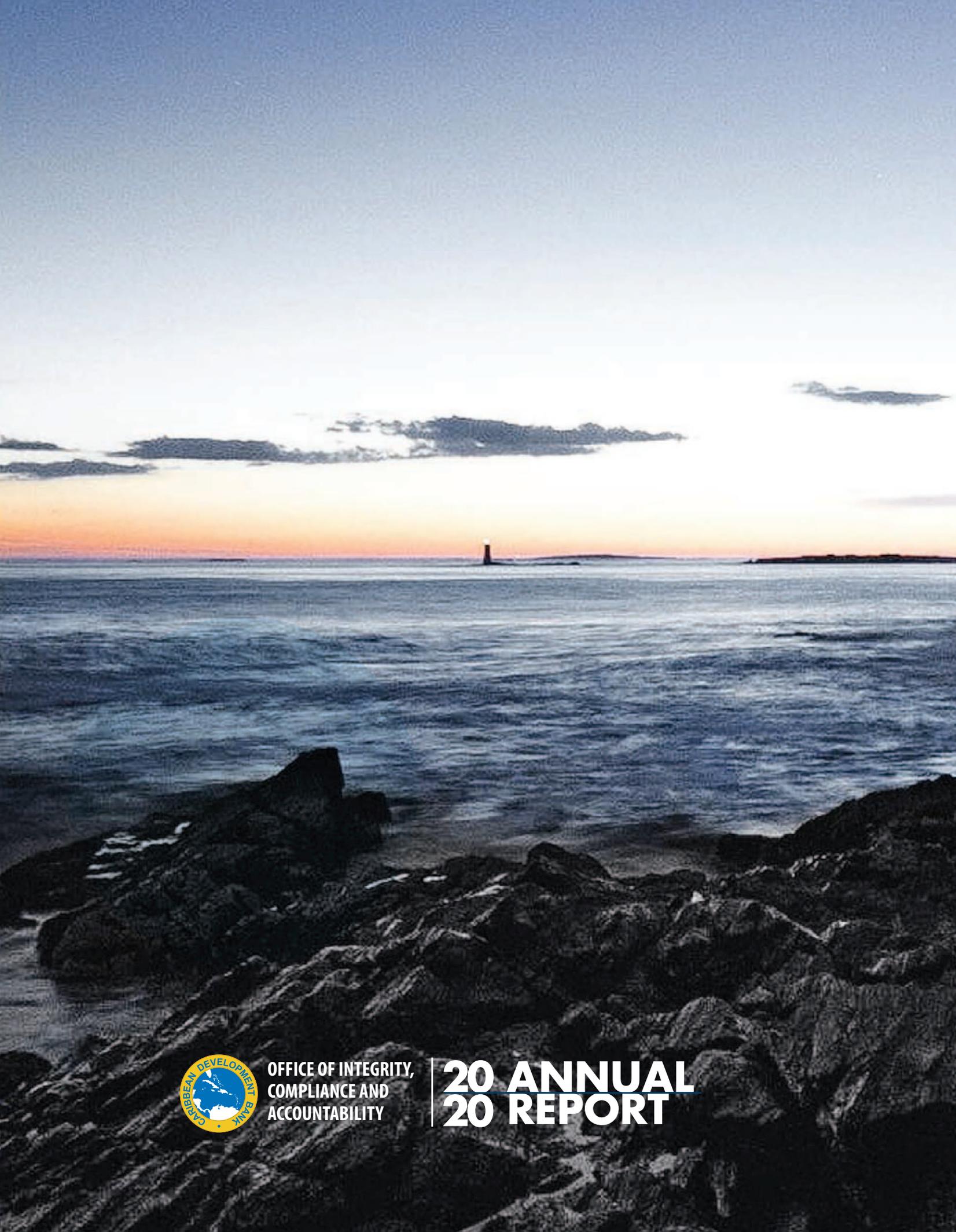
Going forward, ICA will continue to defy the odds when necessary and craft a vision for its mandate as appropriate for a modern digital age. In doing so, ICA will continue to build on a solid foundation; refine its strategy and nurture an evolving governance model that will help to grow and protect the CDB of the future.

APPENDIX 1

ICA'S DELIVERY OF MANDATORY AND VOLUNTARY TRAINING TO STAFF (2016-2020)

This table illustrates the topics covered in general mandatory, voluntary and targeted training sessions between 2016 to 2020 including training delivered to all staff through the 3Cs Conference.

NO.	SESSIONS TOPICS COVERED	YEAR				
		2016	2017	2018	2019	2020
1	Strategic Framework	•	•	•	•	•
2	Combatting Corruption	•	•	•	•	•
3	Fraud Prevention			•	•	•
4	Integrity Due Diligence	•	•	•	•	
5	The ICA investigative process	•	•	•	•	•
6	AML/CFT and Sanctions Compliance	•	•	•	•	•
7	Accountability	•	•	•	•	•
8	Special Session: Cybercrime in Collaboration with the Federal Bureau of Investigations		•			
9	Special Session: Sexual Exploitation and Abuse in Collaboration with the World Bank			•		
10	Harassment, Sexual Harassment and Intimidation			•	•	•
11	The Whistleblower System	•	•	•	•	•
12	Induction Training for New staff	•	•	•	•	•
13	Learning Outcomes for Management			•	•	•
14	Drivers of Corruption in the Caribbean: Perception, Drivers and Trends					•
15	Corruption Prevention: New tools and techniques					•
16	Corruption: Investigations, Sanctions and Sanctions Compliance					•
17	Women and Corruption					•
18	Youth and Corruption					•
19	Town Hall: Role of the Media in Combating Corruption, Money Laundering and Cybercrime in the Caribbean					•
20	Anti-Corruption Frameworks and Offices in MDBs					•
21	AML/CFT and Sanctions Compliance Risks in the Caribbean: Current Landscape					•
22	Money Laundering in the Caribbean: Current Landscape; Risks and Trends					•
23	Money Laundering in the Caribbean: Investigations, Prosecutions and Sentencing: Lessons from Global Investigations and other non-regional cases.					•
24	Cybercrime in the Caribbean: Risks, Trends and Prevention Regional landscape; Risks, Trends Practical insights for the region.					•
25	Connecting Corruption, Compliance and Cybercrime in the Caribbean					•



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