

Transparency and Accountability
For the People of Solomon Islands Project
2019-2023
(“TAP Project”)
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Message from the Project Team

2023 was a good year for the “Transparency and Accountability for People of Solomon Islands” project (hereafter referred to as the TAP Project or Project), despite some notable challenges. At the end of 2023, SIICAC has completed the interview for its two Directors – Prevention and Investigation, with possible start date for these positions in early 2024. A study tour to the Fiji Independent Commission Against Corruption was facilitated, resulting in SIICAC finalising its organisational structures, with 47 job descriptions developed and 24 position approved for recruitment in 2024. A draft interim Complaints Intake and Preliminary Assessment Procedure and a draft interim Investigation planning and conduct procedure has also been developed for SIICAC.

The success of SIICAC strongly relies on the effectiveness and cooperation with other integrity institutions. SIICAC is designed to be a collaborative model. With the Project’s support, MOUs drafted in 2022 were signed in August 2023, between SIICAC with five integrity agencies and between Auditor General and Royal Solomon Islands Police Force (RSIPF). The MOUs provide a framework for collaboration and cooperation in the fight against corruption.

In supporting Solomon Islands meet its obligation under the United Nation Convention Against Corruption (UNCAC), the Anti-corruption Act and in responding to the recommendations of the Truth and Reconciliation Commission Report, the project supported the development of draft Freedom of Information legislation, drafted a new Leadership Code Act, supported the introduction of governance and transparency mechanism to reduce corruption risks associated with the Constituency Development Funds and updated the CDF Act and developed the new National Anti-Corruption strategy 2024 – 2027.

There are now numerous integrity institutions with mandates to address corruption and promote public accountability and good administration. As such, it has become even more critical to ensure strong coordination across the integrity institutions. To foster effective cross-agency cooperation, provide institutional clarity, rational use of resources and capacities, the project supported 10 joint trainings, facilitated 8 dialogues amongst integrity institutions for systematic information sharing between agencies to help build trust relationships and foster longer term cooperation. 3 trainings and awareness raising sessions jointly held by integrity agencies for government ministries and CSO representatives, and for 150 citizens in selected provinces to clarify roles and responsibilities of various integrity agencies and encourage corruption reporting was supported by the project as well.

Solomon Islands integrity institutions also benefited from Pacific-to-Pacific knowledge exchanges, peer-to-peer learning from similar agencies across the pacific to improve investigative, prosecutorial and prevention mechanism. Increasing and strengthening youth engagement in the anti-corruption efforts have also been a main feature of the project’s work in 2023.



Looking ahead, all of these activities leave the Project well-positioned to hit its stride in 2024 and drive forward with a strong programme of work with the Government and with civil society. Relationships with key counterparts are also strong and ready to be activated in 2024 to complete the SIICAC 's full establishment and to finally progress the review and revision of the National Anti-Corruption Strategy.

The Project extends its sincere gratitude to the Solomon Islands Independent Commission Against Corruption (SIICAC) Director General Mr. John Kouni, and the Commissioners, led by Chairman of SIICAC, Sir Frank Kabui, SIICAC staff willingness to continue to partner and engage with the project and its activities. This support has contributed significantly to the impact and sustainability of the activities implemented by the project throughout the year.

The project also extends its gratitude to the Anti-Corruption Secretariat, Policy & Programs, under the Office of the Prime Minister & Cabinet, through Mr. Tony Kabasi, Deputy Secretary Prime Minister Office and Mr. Philp Manakako, Assistant Secretary for their continued support and guidance to the project and its activities.

TAP gratefully acknowledges the partnerships with integrity institutions namely the Office of the Auditor General, the Office of the Ombudsman, the Director of Public Prosecutions, the Leadership Code Commission, the Police Force, the Office of the Commissioner of Inlands Revenue, the Financial Intelligence Unit of the Central Bank of Solomon Islands, the Customs and Excise Division of the Ministry of Finance and Treasury and the Internal Audit Office. These partnerships are crucial for coordination and coherence of work for improved anti-corruption results.

TAP gratefully acknowledges the generous support of our funding partners, the Government of Japan, United Kingdom and Solomon Islands for their support for the project.

Finally, the project has continued to significantly benefit from the continuous cooperation, expertise and support of regional anti-corruption projects based in Suva, Fiji, namely the Strengthening Anticorruption, Transparency and Accountability in Pacific Island Countries ("Pacific Anti-Corruption Project", Fiji) project and UN Regional Anti-Corruption Project (UN-PRAC) implemented with financial support from Governments of the United Kingdom and New Zealand.

The project also acknowledges the support ICACs in Fiji, New South Wales and South Australia, for their ability to mobilize experts and resource people at short notice to assist with activity implementation.



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Project Overview

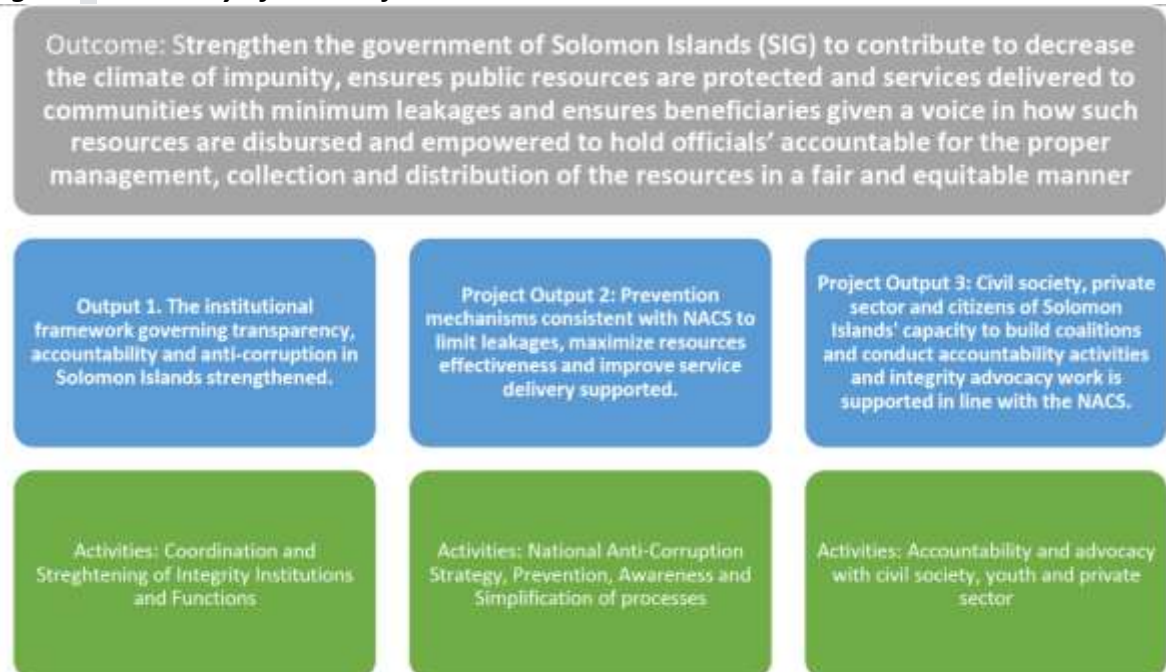
The TAP Project was designed as a follow up to the support provided to Solomon Islands over the previous decade, through the joint UNDP-UNODC Pacific Regional Anti-Corruption Project (UN-PRAC), a regional anti-corruption project funded by the Australian Department for Foreign Affairs and Trade (DFAT).

UN-PRAC supported the development of the Solomon Islands National Anti-Corruption Strategy (NACS) in 2015. The NACS was eventually endorsed by the Parliament and the Cabinet in 2017 which *“recognizes that corruption undermines development and sustains poverty, inhibits economic growth, drives political instability, enables the unsustainable use of natural resources, impacts the delivery of services and undermines good governance and the rule of law”*. Subsequently, in order to progress with the NACS’ implementation, UN-PRAC provided technical advice and support to develop the Anti-Corruption Act, which was passed by Parliament in 2018. That Act clarified the key criminal provisions dealing with corruption and established the legal framework for a new Solomon Islands Independent Commission Against Corruption.

UNDP subsequently developed the Project for Strengthening the Capacities to Combat Corruption (SCCC), which was used to support 12 months of project initiation activities in 2018. The TAP Project took over that work from 2019 and has a four-year implementation timeframe.



Figure 1: Summary of TAP Project Results Framework



The TAP Project has an overarching outcome which aims to support the Solomon Islands Government to address corruption, through the establishment of strengthening of key government institutions and independent bodies, and complementary partnerships with civil society, the media and the private sector. The Project has three core outputs, which are designed around existing national laws, strategies and priorities, in particular, the NACS and the 2018 Anti-Corruption Act. UNDP Solomon Islands is leading the implementation of the TAP Project but continues to access high-level technical experts working on Regional Anti-Corruption Projects and the UNDP Global Anti-Corruption Initiative (GAIN) for the benefit of Solomon Islands.

Anti-corruption in Solomon Islands at a glance

Solomon Islands acceded to the UN Convention Against Corruption in 2012. In line with its international obligations, it initiated the drafting of a National Anti-Corruption Strategy (NACS) in 2015 which was endorsed in 2017. The NACS provides a framework which is intended to guide all sectors of the community – government, the private sector, civil society and the public – on the key activities that need to be implemented to implement UNCAC and address corruption. The NACS Steering Committee was established to oversee the implementation of the Strategy, which was intended to complement the existing Integrity Forum Group (made of up key integrity institutions) and the Civil Society Anti-Corruption Committee.



The NACS was drafted concurrently with other supporting legislation, in particular, a new *Whistleblower Protection Act* and a new *Anti-Corruption Act* both of which were passed by Parliament in 2018. The new *Anti-Corruption Act* is the foundation for establishing a new Solomon Islands Independent Commission Against Corruption, which was charged with leading the fight against corruption. The SIICAC was explicitly required by the Act to work in close cooperation with existing integrity institutions, including the Royal Solomon Islands Police Force (RSIPF), Office of the Director of Public Prosecutions (ODPP), Leadership Code Commission (LCC), Office of the Ombudsman, the Public Service Commission, the Office of the Registrar of Political Parties and the Office of the Auditor General.

In 2023, there remained challenges with fully operationalising the SIICAC, with delays in the recruitment of key personnel, namely the Directors of Prevention, Investigations and Prosecutions amongst others. In practice, this meant that the SIICAC has not been able to fully discharge its mandate according to the 2018 Anti-Corruption Act. Accordingly, the RSIPF continued to take the lead on investigating corruption cases, and ODPP on prosecuting corruption offences under the Penal Code. No corruption cases have been prosecuted under the 2018 Anti-corruption Act.

Output Progress

Output 1: Strengthen the institutional framework governing transparency, accountability and anti-corruption in Solomon Islands

The project through this output focuses on reviewing and improving the existing institutional framework and arrangements related to the work of integrity institutions, including the SIICAC. Under this outputs three sets of activities are envisaged: (i) establishment and enhancement of a new or existing coordination and communication mechanism linked to the implementation of the National Anti-Corruption Strategy and the Integrity Framework, (ii) enhancement of the capacities of integrity institutions through training, technical support and enabling legislation, policies and regulations, (iii) strengthening the corruption investigation, case management and prosecution capacities of the selected integrity institutions.

Find below a summary of activities conducted under this Output.

Tackling the practical challenges of coordination, capacity, and rationalization of use of resources

The success of SIICAC strongly relies on the effectiveness and cooperation of many other complementary institutions such as with ODPP, the ombudsman, the auditor general, leadership code commission, RSIPF whose contribution and interaction play a crucial role. Yet, experience worldwide indicates that in most countries, cross-agency coordination remains weak or inexistent.



In Solomon Islands, the integrity space is fairly crowded with a high number of institutions working in the space. Therefore, the project has supported several interventions that are aimed at addressing practical challenges that have a direct impact on the efficiency and effectiveness of integrity institutions such as coordination, capacity, and rationalization of use of resources.

To foster effective cross-agency cooperation, provide institutional clarity, rational use of resources and capacities, the project supported 10 joint trainings, facilitated 8 dialogues amongst integrity institutions on topics such as the development of the new NACS, the scope and functions of the Integrity Group Forum (IGF) as a mechanism for coordination and using the dialogue platform for systematic information sharing between agencies to help build trust relationships and foster longer term cooperation. The project supported the development of 5 MOUs, recently signed between SIICAC and integrity agencies to guide their collaborations and cooperation on corruption preventions and investigating and prosecuting corruptions in Solomon Islands. The project also supported integrity institutions to hold 10 joint trainings and awareness raising sessions for government ministries and CSO representatives, and for 150 citizens in selected provinces to clarify roles and responsibilities of various integrity agencies and encourage corruption reporting. More details on the project support under this activity are available in later parts of the report.

Signing of MOUs between SIICAC and integrity institutions, 23rd August 2023.



Figure 1 MOU Signing between SIICAC, LCC, AoG, Ombudsman



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UNCAC Article 38 encourages cooperation between public authorities and bodies responsible for investigating and prosecuting criminal offences. This same vision is reflected in the Solomon Islands 2018 Anti-Corruption Act which recognises the need to coordinate and collaborate on corruption preventions - Part 3 of the Act and investigating and prosecuting corruptions – Part 4 of the Act.

The success of SIICAC strongly relies on the effectiveness and cooperation with other integrity institutions. SIICAC is designed to be a collaborative model. With the Project's support, MOUs drafted in 2022 were signed in August 2023, between SIICAC with Office of the Director of Public Prosecutions, Leadership Code Commission, Office of the Ombudsman and Internal Audit Office in the Ministry of Finance. The MOUs provide a framework for collaboration and cooperation in the areas of (i) exchange and use of information (ii) corruption prevention (iii) secondment of officers (iv) referrals (iv) Sharing of resources (knowledge, skills, expertise and experience) (vi) managing shared information among others.

Study Tour: Exchange between Fiji Independent Commission Against Corruption and SIICAC, 31 July – 04 August 2023.



Figure 2 Study Tour with FICAC-SIICAC, Suva, Fiji

In supporting SIICAC to establish its office, UNDP in collaborating SIICAC and with Anti-Corruption Secretariat under the Office of the Prime Minister (OPMC), supported a study tour



with Fiji Independent Commission Against Corruption, based in Suva, Fiji with the overall objective of understanding the essential components necessary for the setup of an ICAC organisation, the required staffing structures, capacities, manual, procedures and processes that need to be in place. As a result of study tour, the project supported SIICAC and OPMC to finalize of the organisational structure for SIICAC with skills, competency areas identified, draft budget projections developed, and list of standard operating procedures, workflow processes, manuals required to establish and operationalise each division/unit under SIICAC identified. These activities are reported separately in the sections below.

Finalizing the organisation structure for SIICAC, September – October 2023

Following a study visit by SIICAC to the Fiji Independent Commission Against Corruption (FICAC) in July 2023, in partnership with the OPMC, SIICAC revised its organizational structure introducing 47 new position to ensure that SIICAC can effectively fulfil its roles as envisaged in the 2018 Anti-Corruption Act of 2018. To support SIICAC and OPMC build SIICAC's human resource capacity, project supported the development of 47 terms of reference for positions to be established under the new structure of SIICAC.

Support to the SIICAC Recruitment Process, March – April 2023

The project enabled SIICAC to benefit from the experiences of the FICAC and South Australia ICAC, who assisted with the recruitment process of three directors (prosecution, investigation, prevention) through the provision of interview questions for these positions.

Strategic Plan development for SIICAC

With the National Anti-Corruption Strategy 2024 – 2027 due to be adopted by the Parliament at the end of December 2023, the project is supporting SIICAC to develop its *Strategic Plan 2024-2027* to set out the SIICAC's directions in terms of the goals to be achieved, how to achieve those goals, and the desired outcomes that will measure success. The work on the Strategic Plan is expected to be completed in early 2024.

A case of Solomon Islands Independent Commission against Corruption (SIICAC)

Although established in 2020, SIICAC is still in the process of establishing the office which is a major impediment for it to be able to fully discharge its functions as mandated and implement its initial National Anti-Corruption Strategy. SIICAC has not yet started any investigation work due to shortages of human resources and overall resources.

UNDP has been working closely with SIICAC to facilitate access to global and regional experiences on inter-institutional cooperation to combating corruption and facilitating dialogue amongst oversight and integrity

The project convened integrity institutions in Solomon Islands, including SIICAC, the Police, the Leadership Code Commission, the Ombudsman Office, ODPP and facilitated cooperation among them. For example, when SIICAC was unable to appoint a director of prosecution, the ODPP stepped in and seconded a senior prosecutor to deal with a case. Inter-institutional coordination was one of the challenge the institution faced and was valued significant importance for the institution.

“SIICAC plays a part in collaborative work with other agencies. A collaborative model is very important. It has been always a challenge to come to an agreement with all the agencies. Thanks to the support provided by the project, better coordination among the institutions has



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institutions on the value-added of cooperation and ensuring coherence across four vital functions (investigation, prosecution, education, and prevention) to combating corruption.

At the national level, inter-institutional coordination facilitated by the project has contributed to breaking the practice of working in silo and encouraged a more cooperative working environment among the institutions. Towards this end, UNDP is also facilitating preparation of MOUs between SIICAC and integrity institutions to be signed in 2023.



created shared understanding and awareness on each role and the importance of working together among the agencies which did not exist before.” - John Kouni, SIICAC Director General

[Video link: <https://youtu.be/hGEvmkTITE0>]

In addition, to offer practical opportunities, knowledge-exchange between SIICAC and FICAC has been facilitated by UNDP. Most recently, a delegation from SIICAC was hosted by FICAC for a study tour and practical exchange of knowledge.

Under the project, UNDP has also been supporting SIICAC on the update/preparation of a new NACS expected to be adopted by end of 2023.

Figure 2: John Kouni, Director General (left) and Roy Patovaki, Office Manager(right).

Secondment of Senior Investigator, New South Wales Independent Commission Against Corruption to SIICAC, November 19 – 4 December 2023.

As part of the project’s support to stand up SIICAC, UNDP facilitated a two-week secondment of a senior Investigator from a well-established ICAC to work alongside the Director General, to assist with the investigative function of SIICAC. Following the review of the relevant legislative framework and broader anti-corruption environment, existing SIICAC complaint intake system, existing draft complaint intake and preliminary assessment procedure, the secondment has resulted in the (i) compilation of a draft interim Complaints Intake and Preliminary Assessment Procedure and (ii) the compilation of a draft interim Investigation planning and conduct procedure. The project will be supporting SIICAC to implement these procedures in 2024.

Groundwork laid for development of SIICAC website, 30 November 2023

A website designer will be recruited to develop the design and content of the SIICAC website. However, initial work on the content had been completed. The design and the content would be peculiar to SIICAC’s collaborative model. The website will be linked to the SIG portal landing page and is anticipated to be launched in the first quarter of 2024. The website will also be complemented by social media pages (Facebook and Twitter).



A case of the ODPP Solomon Islands

ODPP has 26 lawyers in three offices (two each in Gizo and Auki and 22 in Honiara) and a technical advisor and three volunteers. None of them had an anti-corruption background. In the financial crime unit, all lawyers were new to the ODPP, working with the ODPP for less than three years with limited experience in corruption cases.

Mentorship and advisory support including virtual mentoring provided through the project helped the Office handle complex cases and made an immediate positive progress in the performance of the Office.

For example, the ODPP was able to seek support from the UNDP experts and colleagues and peers whom the ODPP has established communication through the regional exchange opportunities provided by the project. Through consultation, sharing documents, and bouncing ideas with them, the ODPP was able to deal with the case.

"Before, we just closed the file when we could not find a charge, but now looking at other offences which may not be as big as the main, there is always something to hold people accountable."



In the area of asset recovery, the ODPP made immediate and unprecedented improvement after the training provided through the project.

"The ODPP did not used to do enough about asset recovery because it did not have expertise. The training provided by UNDP encouraged the ODPP. We just signed two sets of applications to High Court to confiscate properties in commission of crimes. We were able to make three applications this year, preparing all documents and put them before the court. This is significant for us."

[Video link: <https://youtu.be/9VEw7Glmrs>]

Mentoring Assistance provided to the Office of the Director of Public Prosecutions

The project has been providing on-going direct advisory support including virtual mentoring to staff at the ODPP Solomon Islands regarding a current investigation. This has included a legal expert reviewing case materials and providing advice for prosecutors and suggestions for lines of financial investigations to be pursued. Some needs identified by the ODPP Solomon Islands include continued mentoring for four Prosecutors in the Financial Crimes Unit at the ODPP on specific areas such as corruption and fraud training, money laundering and proceeds of crime and mutual legal assistance.

Proceeds of Crime Manual for Solomon Islands developed at the request of the Office of the Director of Public Prosecutions, Solomon Islands

In partnership with the regional anti-corruption project, the Solomon Islands Proceeds of Crime Manual was developed and handover in August 2023. The manual was designed with the intention to address the effective and efficient restraint, confiscation, management, and disposal of restrained and forfeited property pursuant to the Money Laundering and Proceeds of Crime Act (MLPCA) 2002. The manual is designed for use by relevant law enforcement professionals, prosecutors, and asset managers.



A case of The Solomon Islands Financial Intelligence Unit (SIFIU)

SIFIU was established in 2006 as part of the Central Bank of Solomon Islands with the mandate to protect the country from money laundering and terrorism financing activities.

Most of the current staff were new to AML/CFT, most of them started in SIFIU in 2019-2020, when due to the COVID-19 pandemic the office could not send them for training opportunities, and so they are learning by conducting their everyday tasks.

While capacity development for staff has been set as one of the priority areas of the institution, the Unit faces a constraint in budgetary support to provide staff with opportunities for their capacity development since capacity development is not included in the government / central bank budget.

The direct in-house mentoring support and attachment programme to other FIUs in the region provided by the project assisted the SIFIU to overcome the constraints and upgraded the skills of individual staff.

Florence Dafanisi, Senior Analyst, Policy Development and Coordination, among four colleagues, participated in the attachment programme to the FIU of Papua New Guinea (FASU). She was assigned to the policy and legal development coordination team. She has identified that relevant laws and policies are in place which enabled the FASU to exercise authority to carry out its work and meet institutional obligation effectively. She has also identified that MOUs enable inter-institutional coordination effectively.

Returning to SIFIU, she has been working on the review of the Anti-Corruption Act with the Ministry of Justice and IMF. Learning from FASU, she is able to identify some inconsistencies in the Act.

Mary P. Katoboe, Analyst, Intelligence Management was one of the three colleagues in SIFIU who participated in the attachment programme to CIFIU. The programme enabled her to gain technical and legal knowledge required for the Analysis and Investigation Unit (AIU) such as preparing intelligence reports. She gained crucial skills to conduct her work as with previous career in the



Figure 3: (From left) Hilton Koti Gideon, Senior Analyst, Supervision and Compliance and Florence Dafanisi, Senior Analyst, Policy Development and Coordination who participated in the attachment to FASU; and Mary P Katoboe, Analyst, Intelligence Management and Catherine Tozaka, Analyst, Supervision and Compliance who participated in the attachment to CIFIU).

They are expected to work with other experts from FASU and other institutions in Solomon Islands, using the knowledge, skills and confidence gained from the attachment programmes. This will be the first joint on-site examination conducted by the SIFIU.

"Officers who attended training and attachment with other FIUs, have gained knowledge and skills on onsite investigation. I noticed they are more confident to conduct on-site investigations with other institutions including the private sector." - Jimmy Sendersley, Director.

[Video links: <https://youtu.be/4WafuZlgk0>; <https://youtu.be/L84uv7px4po>]

It is expected that improved knowledge, skills and experience of individual staff will directly contribute to the performance of the institution as they conduct the key tasks of the SIFIU playing an important role in the team including communicating with stakeholders, conducting analysis, preparing reports.

"For supervision, individual knowledge and experience is very important. On-site scoping, question development and analysis are very important parts. The training was hands-on, beneficial for the new staff to gain relevant knowledge and skills. Mentoring enabled the staff to gain knowledge of on-site examination, which is very



banking sector she only started learning those technical matters when she joined SIFIU. She saw the higher level of coordination with other institutions which made information exchange across institutions more efficient.

"The attachment programme helped me improve my analytical skills and communication skills. I feel more confident in my report writing and communication with other institutions." - Mary P Katoboe, Analyst, Intelligence Management.

The officers who were trained in the attachment programmes will be part of the team to conduct a joint two-week on-site examination at the Bank South Pacific with FASU planned to take place in August 2023.

[Video link: <https://youtu.be/nAyQV1BDfM0>]

important for the institution. They understood and are now fully aware of what areas to focus on." - Tom Ha'aute, Manager, Policy Development & Coordination Supervision.



Figure 4: Tom Ha'aute, Manager, Policy Development & Coordination Supervision (left), Jimmy Sendersley, Director (center) and Jimmy Vajah, Manager, Intelligence Management (right).

Continued Institutional strengthening of FIU of Solomon Islands (SIFIU) for Anti-Corruption

Throughout 2023, the project in partnership with the regional anti-corruption project, supported the implementation of structured targeted risk-based supervision mentoring for SIFIU. The objective of the mentoring support was to provide Anti-Money Laundering / Countering the Financing of Terrorism (AML/CFT) targeted risk-based supervision mentoring to strengthen the capacity of SIFIU. Key topics covered included: AML/CFT risk-based Supervision: the stance of the Financial Action Task Force (FATF), overview of AML/CFT Risk-Based Guidance, key considerations for designing an AML/CFT risk based supervision manual for SIFIU, planning onsite examination and Conducting offsite surveillance amongst others. A key outcome of the mentoring session for SIFIU was to consider the scope of their targeted AML/CFT supervision of a commercial bank in Quarter 1 2024 in examining the accounts of politically exposed persons (PEPs) and further profiling aimed at investigation of these PEPs for corruption related activities via account logging.

Peer to Peer Exchanges, South-south cooperation with Financial Analysis & Supervision Unit (FASU), Papua New Guinea, 13-24 February 2023; Cook Islands Financial Intelligence Unit (CI FIU), 27 – 30 March 2023.

As a follow-up to these direct mentoring, the project in partnership with regional anti-corruption project supported the peer-to-peer attachment of four SIFIU officers (1 female and 3 males) to FASU (PNG) and three SIFIU offices (2 females and 1 males) to CIFIU which further strengthened South-South regional cooperation. This support included knowledge-enhancing activities aimed at reinforcing SIFIU's institutional capability with a focus on issues of financial analysis, supervision and fostering regional cooperation for countering corruption and money laundering.



The outcomes of the peer-to-peer attachments, especially on sharing the benefits of the intelligence-led supervision model, has led to SIFIU requesting more targeted mentoring on how they can use intelligence to target AML/CFT risk-based supervision of reporting entities. This model has also been highlighted in the handbook on '*Intelligence Led Financial Disruption of Corruption*', a knowledge product developed by the regional anti-corruption project which had been shared with SIFIU and discussed via webinars and in-country mentoring.

The officers who were trained in the attachment programmes will be part of the team to conduct a joint two-week on-site examination at the Bank South Pacific with FASU planned to take place in Q1 2024. They are expected to work with other experts from FASU and other institutions in Solomon Islands, using the knowledge, skills and confidence gained from the attachment programmes. This will be the first joint on-site examination conducted by the SIFIU.

Pacific AML/CFT Supervisions' Forum, May 30 – June 1, 2023, Auckland, New Zealand.

Supervisors play a critical role in combating money laundering and terrorism financing by helping businesses comply with the AML Act and regulations, monitoring and assessing money laundering and terrorism financing risks in their sectors and helping businesses understand these risks. Proceeds of corrupt activities are usually laundered through the financial system to disguise their origin. Supervisors are required to be adequately resourced and equipped with the right kinds of knowledge and skills to provide high level controls and guidance to the operators in the financial system like banks, insurance business and credit institutions.

Since SIFIU is a developing FIU, the project supported two officers (male) to attend the Forum which was beneficial in strengthening/improving the institutional capacity of SIFIU in supervisory work. Officers, in the long term apply the knowledge and skills acquired during the Forum to carry out its obligation to work with the reporting entities to comply to the International Standards on AML/CFT.

Asia Pacific Group on Money Laundering (APG) Annual Meeting and Technical Assistance (TA) & Training Forum (TF), 9 July 2023 – 14 July 2023, Vancouver, Canada.

To ensure that Solomon Islands through SIFIU, continues to strengthen its capacities to address illicit financial flows and improve implementation of AML/CFT standards, the project supported SIFIU's participation at the APG annual meeting and TA/TF held in Canada. At the meeting, SIFIU was able to get updates from the plenary on the outcomes of the Mutual Evaluation Report (MER) for Solomon Islands and discuss the follow-up reports as well.



*Leadership Code Commission (LCC), an anti-corruption institution within the government that governs the conduct of Leaders (Elected and all public officers) would like to firstly thank UNDP for the support rendered towards the (LCC) through the TAP project. Overall, the support was timely and excellent, it supports LCC to advance its mandatory duties and further supports LCC on how to better improve on its duty. LCC would like to thank and commend Ms Nanise and her team for the outstanding work towards LCC which resulted in what LCC was supported in this year. Moving forward, as an anti-corruption institution that is already on the field, LCC would like to more support on its operational mechanism. There is more to be done to fight corruption and we can only do that if we are properly equipped. In short, overall, the support is excellent. At the same time, there is more to be done. Thank you, UNDP.” **Stevenson Belakame, Chair of the Leadership Code Commission***

Strengthening the legislative regime of the LCC, June – December 2023

The LCC is a constitutionally mandated body and has a key role to play in ensuring that leaders act in accordance with the law and demonstrate values of integrity and proper conduct. The draft NACS 2024 - 2027 calls for several legislative and operational reforms aimed at strengthening the LCC to work with leaders to improve their adherence to the law, as well as using the powers of the LCC to impose sanctions where leaders do not meet minimum standards of good behaviour. This includes changes to its legislative regime.

In this regard, the project supported work to review and re-draft the Leadership Code Commission legislative framework to make it an effective anti-corruption tool either directly or indirectly. The LCC is mandated to maintain a register of leaders' pecuniary and non-pecuniary interests. The Anti-Corruption Act 2018 provides for cooperation between integrity institutions and the SIICAC. The alignment and harmonization of relevant provisions of legislation regulating the work of national integrity institutions is required to achieve any practical collaboration.

Since 1999, when the current Leadership Code was adopted in Solomon Islands, many changes have occurred in the anti-corruption international legal instruments, including in the areas, covered by the Leadership Code. The UN Convention against Corruption¹ introduced mandatory standards for all of its Member States, including Solomon Islands. In revising the LCC Act, changes in the following legal instruments, were also taken into consideration order to make the Leadership Code an up-to-date law: OECD Convention against Bribery of Foreign Public Officials in International Business Transactions², Recommendation of the OECD Council for Further Combating Bribery of Foreign Public Officials in International Business Transactions³.

The draft LCC Act, will be handed over to LCC at the end of 2023.

¹[Convention against Corruption \(unodc.org\).](https://www.unodc.org/convention-against-corruption/)

²[The OECD Anti Bribery Convention | OECD Anti-corruption & Integrity.](#)

³[2021 OECD Anti-Bribery Recommendation - OECD.](#)



Acquiring court regalia for Leadership Code Commission.

Under Part V of the Leadership Code (Further Provisions) Act 1999, LCC is empowered to prosecute leaders in the High Court for breaches of the Leadership Code. However, since the LCC Act came into force more than twenty years ago, the LCC has not yet prosecuted any leaders in the High Court for allegations of misconduct in office simply because the office had no legal officers. Now that LCC has a team of lawyers on board, prosecutions may be imminent. The project had supported the LCC by acquiring court regalia for its legal team.

Investigation Compliance & Enforcement Training System (ICETS), 31st July – 11 August 2023.

The project supported 2 LCC officers (1 male, 1 female) to undertake a Certificate IV in Government Investigation (PSP40416) trainings aimed at equipping LCC investigators with skills and knowledge to undertake regulatory and administrative inspections and investigations. The course program covered an understanding and application of regulatory powers, planning and conducting investigations, gathering and managing evidence, interviewing skills and reporting on investigation outcomes. The 2 Officers also had the opportunity to visit the Brisbane Magistrate Court to witness a court proceeding as part of the course.

"Generally, the new ideas learnt from the training had inspired me to advance my work to newer heights which contribute to the overall outcome of our office as an institute. As an assessor, my work is mostly desk-based investigation and assessment of asset declarations received from leaders. I have work on thousands of asset declaration received from leaders (both elected & permanent). Such training is quite beneficial for me and our office since its mainly focus on investigation and compliance...I have learnt compliance and investigation techniques from the training which is also beneficial to me and I am applying them to meet our context" John Fagasi, Principal Assessor, LCC.

"The training has benefit me effectively, it helps me to develop my skills both professionally and personally. I have learned so much within the two weeks and as a Junior investigator for LCC it gives me the chance to grow and develop skills for the investigation roles. It gives me the knowledge to have right investigation skills Example how to gather and analyze evidence, conduct interviews and write proper reports etc. It also helps me to have good understanding of various laws and regulations governing investigations and can able to produce reports that are admissible in court if needed in the future" Tarissa Bula, Investigator, LCC.

Fighting corruption through access to information: a new legislative framework for Solomon Islands, April – September 2023.

Access to information is an essential tool in the fight against corruption. It increases accountability and transparency and allows the identification and uncovering of corrupt practices. RTI reflects the principle that all information held by governments and other public institutions is public information and should only be withheld from the public for legitimate reasons that are within the public interest. As a core element of fighting corruption, UNCAC requires states to make information available about their activities and to engage with civil



society: Article 10⁴, Article 13⁵. The Convention contains a range of other obligations on access to information: Article 7⁶, Article 8⁷ and Article 9⁸. The access to information provisions in UNCAC commit states, including Solomon Islands, to implement changes at the national level. This requires, amongst others⁹ the development of access to information law that allows citizens, civil society, and others to demand information about the decisions of public bodies.

In this regard, the project supported the Office of the Ombudsman to review and update the draft Right to Information (RTI) Bill. The final draft Bill was submitted to the Office of the Ombudsman in June 2023.

In 2024, the next steps are to be support the office seek Cabinet approval for the legislative changes, develop the drafting instructions of Attorney General Chambers and undertake public consultations on the draft with key stakeholders. The need to put in place RTI legislation was also a key recommendation made by the Truth and Reconciliation Commission Report abled and debated in the August parliament sitting.

Developing the new National Anti-Corruption Strategy in Solomon Islands: 2019 NACS Review Process and 2023 Validation Process

⁴ Requires states to take measures to enhance the transparency of their public administration including adopting procedures facilitating public to access information “on the organization, functioning and decision-making processes of its public administration.” States also have to publish information on corruption in the public administration.

⁵ Commits states to guarantee public participation by “Respecting, promoting and protecting the freedom to seek, receive, publish and disseminate information concerning corruption” and “ensuring that the public has effective access to information.”

⁶ Article 7: Publish information on the funding of candidates for elected public office and political parties.

⁷ Article 8: Require public officials declare their outside activities, employment, investments, assets and substantial gifts or benefits from which a conflict of interest may result.

⁸ Article 9: Ensure the public distribution of information relating to procurement procedures and contracts, invitations to tender and the award of contracts, promote transparency and accountability in the management of public finances including “timely reporting on revenue and expenditure”.

⁹ Other requirements include: (i) beneficial ownership register; (ii) Open data, which can be freely used, re-used and redistributed by anyone, facilitates easier analysis of large sets of data on government spending and is crucial to identifying corruption and (iii) Financial & asset disclosure law, that require public officials to disclose their assets, liability and interests.



The Anti-Corruption Act 2018 that was passed by Parliament included specific requirements on the process to review the NACS. The AC Act states that within six months from the enactment of the Act the current NACS must be reviewed. It also states that there will be an annual review of the updated NACS, with the results presented to Parliament.

In keeping with the requirements of AC Act, the NACS 2017-2019 and its Action Plan were reviewed. Consultations took place with stakeholders in Honiara and in the province from 16-30 September 2019 and a first NACS draft was produced. The NACS review process was stalled, amongst other things, due to covid-

19 pandemic. However, in 2023, momentum to review the NACS picked up again, where the project, working closely with OPMC and SIICAC, convened a series of validation meetings, conducted firstly, with all national integrity institutions followed by meetings with individual stakeholders from across line Ministries over a one-month period.

Key outcomes from those meetings recommended that the NACS Action Plan be implemented over a period of four years. Officials also called for the revival of the ICF, with the SIICAC to be its permanent secretariat. Each stakeholder was given the opportunity to update review the draft NACS and their respective activities in the Action Plan attached. As a result, the project supported the updating of the NACS Strategy (draft) building on the first draft developed in 2019. The draft NACS Strategy and accompanying Implementation Plan (Annex A) has been submitted to the OPMC for tabling in Cabinet and for approval by Parliament in the December 2023 sitting, to be implemented from 2024 – 2027.

Due to the delays in the development and approval of the new NACS, in 2024, the next steps are to: (i) develop a robust monitoring and evaluation framework for the NACS, (ii) support the coordination mechanism necessary for the implementation of NACS, (iii) develop the accompanying communication strategy, (iv) pilot joint communication and outreach activities for integrity agencies, WOG communication, (v) develop and adoption of workplan for responsible parties identified by NACS and its action plan, to implement and report on obligations created by the strategy.

Stakeholders consulted for the 2023 NACS review: Office of Ombudsman, Leadership Code Commission, Financial Intelligence Unit, Central Bank of Solomon Islands, Ministry of Public Service, Ministry of Education & Human Resource Development, Office of the Director of Public Prosecutions, Internal Audit Office, Ministry of Finance & Treasury – Internal Audit,



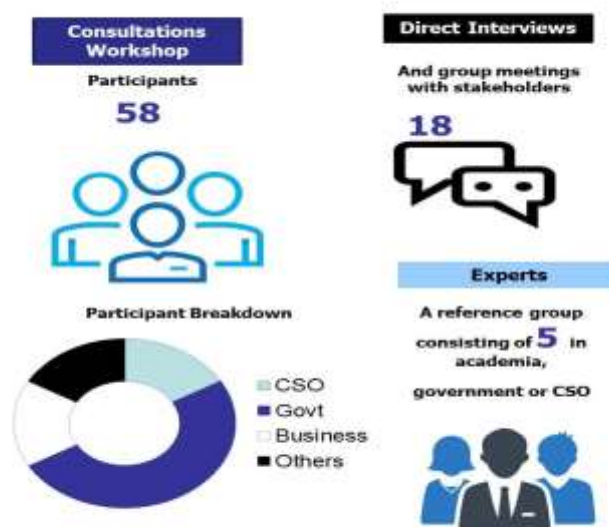
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Accounting General, Ministry of Forestry & Research, Ministry of Justice & Legal Affairs, Royal Solomon Islands Police Force, Ministry of Mines & Energy, Solomon Islands Independent Commission Against Corruption – 67% Male and 33% female, 42 in total.

An overview of the 2019 NACS consultation process to produce the first draft of NACS is outline below:

Fig 1: Summary of Stakeholder Consultations



Signing of the MOU between Auditor general and RSIPF, 23rd May 2023

In partnership with the VakaPasifika Project (regional), the project also supported the development of MOU for the Auditor General, with SICAC and RSIPF. The MOUs were signed on 22nd May with RSIPF and August 2023 with SIICAC.

Investigation Training, 21-25 August 2023

More than twenty senior investigators from integrity institutions particularly the Police Fraud and Corruption Unit, Ombudsman's Office, Financial Intelligence Unit and the Auditor General's Office attended five days investigation training organized by the project. The investigative training strengthened the skills and knowledge of law enforcement officials, anti-corruption agencies in conducting efficient and effective investigations to battle against corruption. The training equipped participants with the necessary knowledges, tools, techniques, and best practices to carry out successful corruption investigations, promote transparency, and enhance accountability.



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In 2024, in building the investitive capacities of various integrity institutions, the project will organised training session focused on the following topics: analysing gathered information, evaluating data, and writing structured reports, in drafting and reviewing investigation plans, analysing, and evaluating the information provided in the reports they receive, scrutinizing financial transactions, preparing interviews, as well as reviewing and evaluating specific evidence such as contracts and invoices, concept and forms of corrupt actions/behaviours money laundering, and the identification and seizure of illegally sourced assets.

Pacific Regional Prosecution Workshop, 6th March 2023, held in Honiara, Solomon Islands.

Acts of corruption, whether private or public sector corruption, can undermine the rule of law and the legitimacy of the state. Holding public officials accountable to the rule of law through prosecution is a vital instrument to give the law meaning in practice. The challenges of prosecuting corruption effectively are well known and widely discussed. Nevertheless, it is the responsibility of Prosecutors, where possible, to endeavor to bring about the successful prosecution of corruption when the evidence allows. This involves close liaison with relevant investigators and other domestic authorities as well as international cooperation, potentially.

In partnership with the pacific regional anti-corruption project, UNDP facilitated a technical level workshop on the prosecution of corruption aimed at ODPP and numerous prosecutors, Leadership Code Commission Solomon Islands (LCC) and Solomon Islands Independent



Figure 5 Participants from across the integrity institution attending prosecution workshop, held on March 6, 2023

Commission against Corruption (SIICAC) & SIFIU. The workshop provided a practical lens into



the prosecution approaches adopted by the relevant integrity institutions. The workshop also reinforced the complementary roles of institutions and built on the MOUs and need for inter-institutional cooperation. Discussions during the workshop also focused on the challenges faced by SIICAC, LCC, RSIPF and ODPP in identification, investigation and successful prosecution of Corruption matters in the context of Solomon Islands.

The Solomon Islands integrity institutions also benefits from the experiences sharing with guest speakers (online participation) - Mr David Morters SC, a barrister from NSW, who shared insights on prosecuting certain frauds, money laundering and other financial crimes. Mr Savumiramira shared the experience on FIICAC's use of non-conviction-based confiscation. Mr Josaia Naigulevu, Vanuatu's Director of Public Prosecutions also participated as a panelist.

Looking ahead, in 2024, the following activities remained to be implemented under this output and its sub-activities: establishing the monitoring and evaluation framework and communication mechanism for NACS; supporting the establishment and trainings for integrity officers, facilitating the movement of the equipment purchased under the project and moving them provinces to support the integrity functions to be established under the provinces. These activities are reflected in a Phase 2 of the project.

Output 2: Strengthening Corruption Prevention mechanisms consistent with NACS to limit leakages, maximize resources effectiveness and improve service delivery.

Under this Output, the focus of the project is to strengthen corruption prevention mechanisms and to work with counterparts to drive a whole-of-government, whole-of-society effort to review and revise National Anti-corruption Strategy. Work to update the NACS, which comes under the responsibilities of the Anti-Corruption Secretariat under the OPMC only started in August 2023.



Figure 6: Heads of Integrity Agency participating in a panel discussion at Ethics and Integrity Framework Workshop

Therefore, in the absence of NACS, project has made efforts to implement activities that contribute to corruption prevention, raises awareness through outreach activities with the media and worked closely with sectors, actors associated with large revenues or expenditures to promote legislative and performance frameworks that

promotes good governance, transparency, reduces opportunities for corruption promotes a more comprehensive development effort for improved service delivery.



Find below a summary of activities conducted under this Output.

Supporting the revision of the Ethics and Integrity Modules of the Institute of Public Administration and Management (IPAM)

With the support of the project, the ***Ethics and Integrity Modules*** of the IPAM, a division with the Ministry of Public Service (MPS), mandated to build the capacity of the Solomon Islands public service workforce, is currently being revised. The project support towards the revision of the IPAM modules is a recognition that integrity training offers a valuable tool to strengthen awareness about corruption prevention in the public sector as part of a broader and comprehensive anti-corruption framework. Supporting IPAM to organise such trainings provides an opportunity to stress shared values among employees of a SIG while also functioning as a corruption prevention mechanism. In modifying the modules, the project will ensure that the anti-corruption framework such as codes of conduct and ethics, conflict of interest rules and procedures, disciplinary measures for public servants and asset disclosure are integrated into the module. The revised module will also include practical examples to help public servants recognise potential integrity issues once they occur in their place of work and understand how to adequately address and manage them.

Workshop on Enhancing the Transparency, Accountability & Representation of Political Parties, 31 January-1 February 2023

Building on recent research, commissioned by UNDP Pacific Office, the Office of the Registrar of Political Parties in Solomon Islands with the support of UNDP organised a workshop on enhancing the transparency, accountability, and representation of political parties in Solomon



Figure 7 Ms. Joyce Grant, General Secretary of PNG National Alliance Party sharing her experience with SI political party representatives.

Islands. The workshop brought together UNDP's electoral support project which includes elements of support for political parties strengthening and the anticorruption project to host dialogues on challenges facing political parties in Solomon Islands; develop a list of regulatory and institutional changes that legislators and other policymakers could consider strengthening the functioning of political parties in country. The workshop participants included political party leaders and officials; guest speakers from PNG Political party regulator, executive

members of political parties from Fiji, PNG and Timor Leste, Members of Parliament; officials from SIEC, ORPP; and representatives of civil society organisations; and technical experts working in the field of political party development. As a concrete output of the workshop, a list of recommendations was developed, covering three thematic areas: representation of political parties and promote women, youth and marginalised groups; transparency in political



party financing; and internal functioning of political parties. The project's support for workshop was in line with Article 7(3) of the UNCAC which requires States parties to enhance transparency in the funding of political parties and public office candidates.

Collaboration with Auditor General to host 3-day dialogue for integrity agencies and civil society to promote public sector transparency and accountability, 29 - 31 August 2023.

Supreme Audit Institutions (SAIs) oversee the management of public finances. Traditionally, the role of SAIs has been seen as promoting public sector transparency and accountability within a wider climate of good governance. However, recent global trends indicate that some SAIs have taken a more active role in combating corruption. Successful approaches include identifying and publicising areas of corruption risk, working closely with other institutions, and publicising the recommendations of audit reports more widely.

Organized by the Auditor General in partnership with the International Monetary Fund (IMF) and the Project, a 2-day workshop (29, 31 August) for integrity agencies was organized to review cooperation, learn from international good practices on how to work collaboratively to address the corruption risk areas highlighted release of the compliance audit^{10 11 12 13} of three key ministries responsible for country's COVID-19 preparedness and response plans during the 2020 State of Public Emergency (SOPE). Overall, 26% of participants at the training were female and 74% male.

On the 30th of August 2023, a one-day workshop was held with integrity institutions and CSOs. This activity is reported under Output 3.

Legislating for the governance of the Constituency Development Fund.

Constituency Development Funds are a mechanism which allow direct engagement and funding of initiatives and projects by elected representatives in their circumscription. First celebrated as an innovative budget mechanism, they have been a constant source of controversy around the world since they were first introduced decades ago. CDF's have also been criticised for being inefficient and vulnerable to corruption and mismanagement. The Global Corruption Barometer – Pacific 2021 records for the first time the perceptions and experiences of corruption among ordinary citizens from 10 Pacific countries and territories. The results reveal high levels of bribery, sextortion, and vote-buying. One of the perceived reasons for a high level of corruption is through the CDF.

¹⁰ <https://www.oag.gov.sb/documents/audits/performance-audits/340-audit-report-on-procurement-relating-to-covid-19-disaster-relief-fund-by-the-national-disaster-management-office/file.html>

¹¹ <https://www.oag.gov.sb/documents/audits/performance-audits/339-audit-report-on-procurement-relating-to-covid-19-disaster-relief-fund-by-the-ministry-of-infrastructure-development/file.html>

¹² <https://www.oag.gov.sb/audits/performance-audits/338-thematic-audit-report-on-covid-19-related-procurement-in-a-state-of-public-emergency-by-three-ministries/file.html>

¹³ <https://www.oag.gov.sb/audits/performance-audits/337-audit-report-on-procurement-relating-to-covid-19-disaster-relief-fund-by-the-ministry-of-health-and-medical-services/file.html>



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Figure 8 Consultations with Members of Parliament to get Members inputs into the proposed draft CDF Act, 08 June 2023

Since 2022, the project had supported the Ministry of Rural Development to undertake public consultations with government, private sector, CSOs, members of parliament and in the province with the intention to introduce new governance and transparency mechanisms into a revised/updated CDF legislation. At the time of writing this report, the CDF Bill 2023 is currently in parliament for debate. The implementation of the new CDF Act 2023 will strengthen good governance, improve, ensure effective delivery mechanisms of the CDF and promotes equal and inclusive participation of Solomon Islanders in development. Furthermore, as part of corruption prevention measures, the new legislation puts in place mechanisms for holding both custodians and beneficiaries of CDF accountable for misuse of this public fund.

In 2024, the next steps are to: (i) support the MRD to develop a monitoring and evaluation framework for the new CDF Act, (ii) training MRD staff, MPs and relevant officers on the new requirements of the law – proposal writing, acquittals, reporting requirements, (iii) work with community-based organisation on social initiatives to report on the use of CDFs, (iv) community awareness on the new law and roles of communities in the enforcement of the new law (v) establishment of formal collaborations with line ministries through MOUs on the implementation of CDF under the new law.



Workshop hosted for the public service to encouraged to build a culture of integrity and ethics, May 24 – 26, 2023



A two and a half day training in Honiara, on the Integrity and Ethics Agency Improvement Framework targeting key government anti-corruption partners was held. The training was organized by the Ministry of Public Service, the Anti-corruption Secretariat under the Office of the Prime Minister, TAP and regional anti-corruption project. Two dozen permanent secretaries and senior executive officers from the government ministries and integrity agencies participated in the training, representing different public institutions, including, the Ministry of Public Service, Ministry of Finance, Ministry of Health, Ministry of Agriculture and Livestock, Ministry of Commerce, and Ministry of Education, as well the office of the ombudsman, the IPAM, SIICAC.

The idea was that through the training, participants would understand fully the “**Integrity and Ethics Agency Improvement Framework**,” and the process, tools and strategies that are needed to apply and use it as a tool. Also, that participants would understand the opportunities and challenges for public integrity in the country context. When applied, the Framework is expected to support agencies to build baseline integrity and ethics surveys, roll out surveys and analyze results to identify strengths and gaps, and prioritize work to strengthen public integrity and ethics.

In 2024, the next steps are to work closely with Ministry of Public Service, SIICAC and OPMC, to select 1-2 pilot Ministries interested in using the framework to assess the ethics and integrity gaps within their agencies and working together to develop initiatives that strengthen integrity and ethics as part of corruption prevention work.

The Pacific Anti-Corruption Regional Conference (PACRC), 27-28 July 2023, Natadola, Fiji

The project supported eleven participants (9 males, 2 females) from the integrity institutions to join the PACRC held in Natadola, Fiji. The conference attracted around 182 in-person participants from the international arena, regional and local representatives from the government ministries, public and private sectors, statutory bodies, members of the diplomatic core, media personnels including representatives from civil society and academia. The deliberations at the two-day PACRC were anchored on international commitments such as the UNCAC, the 2030 Agenda and the SDGs, regional commitments such as the Teieniwa Vision, the Boe Declaration, and the 2050 Blue Pacific Strategy that brought together anti-corruption agencies and authorities and other stakeholders from the Pacific region to share



knowledge, lessons learned, good practices and success stories in addressing corruption through regional unity and cooperation.

Within an overarching knowledge-sharing and partnership-building framework, the conference was framed around several main topics including International and regional commitments; Pacific Anti-Corruption landscape: taking stock of lessons learnt, challenges and opportunities (case studies from the Pacific); Regional unity, cooperation, and networks: what is working, what are the needs, how to better collaborate regionally; and Building partnerships and collaboration with stakeholders. The whole-of-government and whole-of-society approach across the Pacific.

Feedback from participants indicates that the workshop was useful in affording the opportunity for pacific-to-pacific learning of various integrity framework set up and arrangement across the pacific and globally. The PACRC also enabled the delegation to network with peers from similar institutions, gather insight and ideas of possible corruption prevention interventions to implement locally, including learning about new investigative and prosecutorial technics. Integrity institutions with SIICAC should consider hosting annual dialogues with public and private sector as part of providing policy leadership on the topic of combating corruption.

Good Decision-Making Seminar held for Permanent Secretaries

In launching the “Good Decision-Making Manual” in 2021, the SI Office of the Ombudsman noted that there is evidence of bad decision-making throughout the entire public service, and despite the huge resources spent on good governance and its principles – transparency, accountability, training and advocacy, the evidence to-date shows little improvement in the decision-making of public officials. Bad decisions are made when responsible officials are not following the appropriate law and legal processes when making crucial decision on behalf of the state.

For this reason, the Office of the Ombudsman, in partnership with the Project, hosted a one-day seminar for senior public officials (permanent secretaries, deputies) using the content of the Manual as a guide, to train decision makers to make good decisions based on law, facts and proper use of discretionary powers vested in them and to ensure that decisions made are fair, just and can be defended in any court of law. Therefore, in turn, limiting chances for corruption, helps reduce the cost of bad decision in public offices, and subsequently reduce wastage of valuable taxpayers dollars that can be put to good use to drive development in the country.

Pacific Regional Workshop on Beneficial Ownership, 7-8 March 2023

Transparency of the beneficial ownership of corporate vehicles is increasingly regarded as an essential element in the fight against corruption and as a tool for preventing money laundering and countering the financing of terrorism. As numerous case studies have shown, corporate



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vehicles, including companies, trusts, foundations and fictitious entities, can be misused to conceal the identities of the people involved in large-scale corruption and to hide and transfer the proceeds of corruption. UNCAC calls on States Parties to collect and record beneficial ownership information on corporate entities for anti-money laundering purposes. States are also supposed to require financial institutions to verify such information, particularly for high-value accounts and transactions.



Figure 10 Presenting the results of the group work at the BO workshop.

A two-day Beneficial Ownership workshop was held in Honiara, with participation from FIUs and selected Financial Institutions in six Pacific island countries namely Cook Islands, Fiji, Vanuatu, Nauru, Samoa, Tonga and Solomon Islands. The workshop addressed these objectives:

- Update the attendees on the outcomes of the public consultations on Financial Action Task Force (FATF), R.241 and R.252 on beneficial ownership following the FATF Plenary and what are some practical considerations for implementation of these measures in an adequate, accurate and timely manner.
- Discuss the critical role of the private sector in enhancing the adequacy & accuracy of Beneficial Ownership information.
- Discuss with the participants the key challenges faced by the private sector in conducting effective customer due diligence of Beneficial Ownership (and Ultimate Beneficial Ownership).
- Understand the key role that financial intelligence units play in unmasking proceeds of crime/ corruption.
- Engage in holistic discussions on the experiences, challenges, and lessons-learned in collecting beneficial ownership information.
- Map a way forward for the implementation of these measures by relevant stakeholders in their own jurisdictions.



A total of 31 participants (14 female (45%), 14 male (55%) attended the workshop.

Looking ahead, in 2024, the focus of support are the following: development and adoption of workplan for responsible parties identified in the NACS; developing pilots with selected Ministries to simplify process of access to public service working with SOE on compliance with integrity principles in line with NACS; piloting of initiatives at national and provincial level on corruption reporting mechanism.

Output 3: civil society, private sector and citizens of Solomon Islands confidence to build coalitions and conduct accountability activities and integrity advocacy work in line with the National Anti-Corruption Strategy.

By altering power relationships based on access to information and resources, this outcome aims at supporting demand for accountability and general responsiveness from the government working with private sector and with civil society including youth, women and faith-based groups.

Engaging youth is also key to tackling the challenges that corruption poses to society. In order to meaningfully engage youth, young people not only need to be involved but the capacity and “voice” of youth need to be strengthened. In the spirit of fostering a co-leading and co-creating approach with young people, the project in 2023, implemented several initiatives to promote meaningful youth participation and empowerment.

Find below a summary of activities conducted under this Output.

Collaboration with Auditor General to host 1-day dialogue for integrity agencies and civil society to promote public sector transparency and accountability, 30 August 2023.

Organized by the Auditor General in partnership with the International Monetary Fund (IMF) and the Project, on the 30th of August 2023, a one-day workshop was held with integrity institutions and CSOs, to raise awareness and clarify institutional arrangements of integrity institutions, encourage the partnership with CSOs for corruption prevention including reporting and raise visibility and awareness on the recommendations of the audit reports



Figure 11 The Auditor General making his opening remarks at the workshop hosted by AoG, IMF, UNDP TAP



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including identification of potential areas of partnership as part of social accountability initiatives.

Induction for National Youth Congress and Provincial Youth Councils, 5th May 2023

The project had supported a day induction program for seventeen youth leaders from the National Youth Congress and all nine Provincial Youth Councils (PYCs). Participants have been inducted on the national integrity framework, the obligation of Solomon Islands as a state party to the UNCAC and what it means for both policy makers and citizens. The induction also served to prepare the participants travelling to participate in the regional conference in Auckland, New Zealand.

Pacific Youth Spotlighting Anti-Corruption in Climate Change and Gender Equality, Auckland, New Zealand, 11- 12 May 2023.



The project supported 10 (3 females, 7 males) representatives from the SI National Youth Council and Provincial Youth Councils to attend the first ever youth dialogue focusing on issues of common concern in the Pacific. The Conference built on a series of milestone developments under the unprecedented youth anti-corruption movement led by USPSA with support from the Pacific regional anti-corruption project. It aimed to inform, inspire, empower, and add further momentum to an important emerging youth movement particularly concerned with the connections between corruption and sustainable development by spotlighting two key topics: responding to climate change and promoting gender equality in the Blue Pacific region.

Feedback from 10 participants indicated that the workshop was useful platform for awareness raising on specific challenges, opportunities and solutions to addressing corruption challenges in the Pacific in relation to climate change mitigation and promoting gender equality. The



conference provided a platform for SI youth to engage policy makers, experts, researchers, and practitioners to gain better understanding and share knowledge and best practices on how to achieve progress in the fight against corruption to improve climate change mitigation and gender equality outcomes. The conference highlighted the importance of promoting women's leadership in anti-corruption efforts and decision-making processes and explored ways to address the gender gap in leadership positions in the public and private sectors.

The regional workshop highlighted the “similar the challenges faced by Pacific youth and how we can address them together...connection between inequality and how it instigates corruption.” She looks forward to sharing the reflection on the conference with the provincial team and building a strategy to follow to involve rural youth in fighting corruption. Edith Faylyn Kuali, 28, Vice President Central Island Provincial Youth Council

Anti-Corruption Training for Members of Provincial Youth Councils, 17th November 2023

Four PYCs and their members have been empowered through Anti-Corruption Training held by the project aimed at grounding participants' understanding of corruption offenses as defined by the Anti-Corruption Act 2018 and reporting of corruption incidences in compliance with the Whistleblowers Act 2018. The training was conducted in different locations and dates as shown in the table below.

PYC	Participants	Training venue	Dates
Western	28	Gizo	17 th – 20 th Sept, 2023
Honiara City	25	NYC office, Honiara	3 rd – 6 th Oct, 2023
Renbel	5		
Malaita	30	Auki	13 th – 17 th Nov, 2023

Small grants support to PYCs to conduct corruption prevention activities, Nov - Dec 2023

An outcome of the Anti-Corruption training was for each PYC to design and implement anti-corruption activities within their localities with grant support from the project. All the PYCs have decided to conduct community outreaches in their respective provincial wards and villages. The form of community outreaches varies for each PYC. The table below shows provincial wards that the respective PYCs have reached out to.

PYC	Wards/villages visited		
Western	Gizo	Munda	
Honiara	East Honiara	Central Honiara	West Honiara
Renbel	Rennell	Bellona	
Malaita	Auki	Ambu village	



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Figure 12 Anti-corruption training for youths in 4 provinces

Updating DSE Booklet on Anti-Corruption Offences in Solomon Islands, 30 November 2023.

With the project's support in 2019, the Development Service Exchange (DSE), the umbrella body for CSOs, produced a booklet on corruption related offences in the Solomon Islands. In 2023, the project supported DSE to update the booklet to reflect only the corruption offences as defined by the Anti-Corruption Act 2018. The revised booklet can be used by any person or organization, as a resource book/guide for the conduct of civic education on corruption and anti-corruption.

Engaging State Owned Enterprises (SOE) in corruption prevention

In many countries crucial public services such as energy, water, transportation and health care to communities are provided by enterprises either controlled or partly owned by governments, known as SOEs. It is the most vulnerable in communities that suffer most when public services are poorly delivered or are tainted by corruption. This makes it crucial that these enterprises operate with integrity, transparency and accountability. Compared to other companies, SOEs have specific corruption risks because of their closeness to governments and public officials, and the scale of the assets and services they control.

With the support of the project team, SIICAC have started consultations in the 4th quarter with senior management teams of State-Owned Enterprises. The Director General of SIICAC during the consultations briefed SOE about the functions of SIICAC, highlighted potential areas for cooperation in combating corruption and overall objective of the NACS. Further dialogue



between SIICAC, SOEs and selected government ministries will continue in 2024 after Parliament endorses the revised 2023 NACS.

Development of anti-corruption curriculum with academia.

Under the regional project, the Right to Information (RTI) online course and resources were launched in partnership with University of the South Pacific. The RTI e-course will enable USP students and everyone to register for an easy-to-access course and gain in-depth knowledge of RTI and its importance in the Pacific and beyond. The project, in 2024, will work with USP to ensure that the course is made available to USP student in Solomon Islands. The project has begun discussions with SINU to develop its ethics and integrity courses for 2024.

International Anti-Corruption Day, 8th December 2023

In Quarter 4, the Project in partnership with SIICAC, worked on developing a suite of activities to mark International Day Against Corruption Activities (IACD). The activities implemented are as follows:

Community Outreach – Guadalcanal Province

Co-financed with SIICAC and in partnership with other integrity agencies and Central Islands Provincial Government, a programme of community outreach, for the second time, led by SIICAC, was also organised for Guadalcanal Province from 12 – 15 December 2023.

The outreach program provided an opportunity for communities around Honiara, to hear directly from SIICAC and other integrity agencies on their respective roles in working together to fight corruption, information sessions on what is contained under the 2018 Anti-corruption Act and the Whistle Blowers Act, aimed at encouraging the public to report corruption.

March and Panel Discussion to mark International Day Against Corruption, Honiara, 15 December 2023

Due to bad weather, the Project in collaboration with SIICAC and integrity institutions marked IACD on the 15th of December 2023. This event began a parade, where integrity agencies, university students, CSOs and the private sector, Government Ministries walked together in recognition of this year's IACD theme: UNCAC at 20: Uniting the World Against Corruption.

By walking together, the people of Honiara show that they are, together as a nation, united against corruption. The parade is also in celebration of a milestone for Solomon Islands: while celebrating UNCAC's twentieth anniversary, Solomon Islands is celebrating its eleventh year of UNCAC, having ratified the Convention on 6 January 2012.

Following the march, a panel discussion, featuring SIICA, heads of integrity institutions and PS Ministry of Rural Development discussed how these agencies and organizations are collaborating to stop corruption in its tracks.



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Looking ahead in 2024, the focus of the support are the following: develop pilot projects through partnership with CSOs and integrity institutions on reporting mechanism for corruption complaints, working with SINU to develop their integrity curriculum.



Reporting Against the Results Resource Framework

Expected outcome and output indicators	Indicators	Baselines	Targets	Progress
Outcome: Increased government transparency, Accountability and responsiveness to citizen demands, including proper management, collection, and distribution of the resources in a fair and equitable manner.	Outcome Indicator 1: Number of legislative/policy/administrative changes/reviews taken up by the government and stakeholders, including private sector & CSOs, to increase transparency, accountability, and responsiveness to the	The existing legislative/policy/administrative mechanisms & processes need improvements to ensure transparency and accountability of institutions in Solomon Islands	At- least 5 legislative/policy/administrative changes/reviews undertaken by the government and other stakeholders.	• FOI/RTI legislation reviewed and drafted. • LCC legislation reviewed and drafted. • CDF policy approved by Cabinet. • CDF ACT reviewed and drafted, tabled in parliament. • NACS reviewed, drafted, to be tabled in parliament in dec 2023
	Outcome Indicator 2: Percentage increased in the awareness level of citizens and other stakeholders (CSO, society, media, and private sector) about their rights and roles in accountability and integrity processes for increased government transparency, accountability.	Limited awareness and knowledge of citizens about their rights and roles in accountability and integrity processes.	Increased capacity and knowledge on anti- corruption of at-least 70% of project target groups (public officials, citizens, CSO, society, media, and private sector) reported increased.	50% target beneficiaries report an increase in capacity and knowledge on anti- corruption as verified by BTORs, stories of changes
Output 1: Strengthen the institutional framework governing transparency, Accountability, and anti-corruption in Solomon Islands.	Output Indicator 1.1: Number of the cases reported through the coordination and communication mechanism(s) established for implementation of the National Anti-Corruption Strategy and the Integrity Framework.	No formal coordination and communication established for the implementation of National Anti-Corruption Strategy and the Integrity Framework.	5 cases are reported through the coordination and communication mechanism(s) established	• 6 MOU to facilitate coordination established and signed. • 2 cases referred to SIICAC for further investigation.



Expected outcome and output indicators	Indicators	Baselines	Targets	Progress
	Output Indicator 1.2: Number of evidence-based knowledge products developed to improve oversight and information management.	No M&E framework and communication strategy is in place.	5 evidence-based knowledge products developed to improve the oversight of integrity institutions. • 1 M&E framework • 1 Communications strategy • 3 quarterly M&E reports	• Work to update the NACS 2024 – 2027 only commenced in August – December 2023 and will be tabled in the December 2023 sitting in parliament. • Pending: Therefore, work to development the M&E framework, communication strategy will only commence in 2024.
	Output Indicator 1.3: Number of trained newly employed public servants have the sufficient knowledge to tackle corruption cases	Limited staff with no formal and comprehensive training held resulted in limited capacity of available officials/staff from Anti- corruption commission and integrity staff.	At-least 75% of newly employed public servants have an increased knowledge to handle corruption cases 2 years after the training.	Pending: Due to the delay in staff recruitment, including key position of Director (Investigation) intensive trainings for SIICAC was not held. However, training for other integrity institutions were held with 70% reporting increased in knowledge in better management of corruption cases.
	Output Indicator 1.4: Number of initiatives undertaken to establish and improve case management, corruption investigation and prosecutorial capabilities for enhanced judicial integrity.	Limited resources and processes defined to establish and improve case management, corruption investigation and prosecutorial capabilities for enhanced judicial integrity.	5 initiatives undertaken, • Training of 60 integrity and law enforcement staff. • 2 Exposure visits for 8 government officials • Development of at least 1 code, 2 procedures and 2 manuals on judicial	20 training held to increase investigative, prosecutorial capacities. 10 exposure visits held 5 codes, manuals developed Refurbishment of SIICAC offices



Expected outcome and output indicators	Indicators	Baselines	Targets	Progress
			integrity and prosecution by the expert. • Refurbishment of 10 integrity offices. • Model Public space redesigned / reconstructed to ensure access of 100 citizens, monthly basis, to ensure safe access and better citizen centric public service and business practices	
Output 2: Strengthening Corruption Prevention mechanisms consistent with NACS to limit leakages, maximize resources effectiveness and improve service delivery.	Output Indicator 2.1: Percentage (%) of capacitated representatives from CSOs, reported improve access as a result of simplified institutional procedures and processes to access public services.	Lack of awareness and limited access to public services capacity building opportunities offered to youth groups and CSO to promote the importance of Anti-corruption and understanding on simplified institutional procedures and processes to access public services.	50% of capacitated representatives from CSOs, reported improve access as a result of simplified institutional procedures and processes to access public services.	• IPAM curriculum on ethics and integrity revised. • Trained 30 media on anticorruption reporting with MASI. • Pending: development of simplified institutional procedures and processes to access public services.
	Output Indicator 2.2: Number initiatives / actions undertaken by entities, including private and SoEs, to ensure compliance and integrity principles in line with NACS and global standards as a result of newly /formally established partnership.	No formal partnership established for entities including private and SoEs, to ensure compliance and integrity principles in line with NACS and global standards.	At least 2 actions undertaken. • Conduct 5 comprehensive Corruption Risk Assessment or institutions.	• Business integrity workshops held for SIWIBA, SICCI, YECSI • Supported SIICAC to hold dialogues with selected SOEs. • 3 CRA (Lands, Agriculture) conducted with response plans developed.



Expected outcome and output indicators	Indicators	Baselines	Targets	Progress
			• 5 Joint reviews to institutionalize of integrity code of conducts for entities including private sector and SoEs.	
	Output Indicator 2.3: Number of tech- based pilot initiative undertaken to improve access to services and tracking and reporting mechanisms in response to corruption.	0 (No tech-based tracking and reporting mechanisms established in response to corruption).	1 tech-based pilot application / solution developed to improve the reporting and tracking of corruption cases.	Pending: Due to the delays in recruitment of SIICAC staff, limited support was provided to develop 1 tech-based application. • Non tech-based solution were however, put in place: complaint handling manuals and register developed
	Output Indicator 2.4: % of entities (private & SoE) agreed compliance and integrity principles in line with NACS and global standards	Weak compliance and integrity principles in line with NACS and global standards by entities including private & SoE	50% of entities, engaged in the project, agreed for the compliance and integrity principles in line with NACS and global standards as a result established partnership and capacity building initiatives	• Pending: Work on this will be undertaken in 2024 to pilot the Ethics and Integrity Framework Assessment and develop appropriate response plans.
Output 3: Civil society, private sector, and citizens of Solomon Islands' confidence to build coalitions and conduct accountability activities and integrity advocacy work in line with the National Anti-Corruption Strategy	Output Indicator 3.1: Number of representatives from civil society, media and private sector capacitated to fully play its role in accountability and integrity process.	Lack of awareness and limited capacity building opportunities offered to CSO, media and private sector to play its role in accountability and integrity process.	430 representatives from civil society, media and private sector capacitated to fully play its role in accountability and integrity process.	• 120 youth representatives capacitated. • 40 women members of women provincial councils capacitated. • 3 private sector capacitated.
	Output Indicator 3.2: Number of initiatives / actions undertaken as a result of partnership established with entities at national and regional levels to promote knowledge sharing based on international best practices.	No formal partnership established at national and regional for innovative integration frameworks based on evidence and international best practices.	• 4 initiatives/actions undertaken through established partnership with entities at national & regional levels. • 4 awareness material developed Integration of	• 1 curriculum and e-course launched with USP on RTI • 1 handbook for CSOs on understanding corruption reviewed and updated in partnership with DSE. • 10 regional knowledge sharing facilitated.



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Expected outcome and output indicators	Indicators	Baselines	Targets	Progress
			• 2 integrity curriculums to the teaching programs of the academia • 2 Pilot projects on reporting mechanisms for corruption complaints • 3 curriculum and guidance material developed through national and regional level partnerships	• Pending: Pilot projects on reporting mechanisms for corruption complaints, due to SIICAC delayed recruited, therefore it had no staff to handle complains and investigate complains.



Communications, visibility, and partnerships

Activity Topic	Date	Project	Link	Type	Impact				Shares
					Views	Quote s	Likes	Comme nts	
January to December 2023									
Political parties workshop Press Release	Feb 1	TAP SECSIP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid02RXLTCaUVkyQCFb7FGssbMe8A56np3F2WegcLc2CdSWJkGG4dTbaLBrmsTUKaRVsI	Facebook post	8,176		48	1	7
	1 Feb		https://twitter.com/UNDP_Solomons/status/1620586567135031296	Twitter post	4077	2	31		11
	1 Feb		https://www.undp.org/pacific/press-releases/advancing-openness-inclusiveness-and-transparency-political-parties	UNDP website blog post					
			Solomon Islands Gov: https://solomons.gov.sb/advancing-openness-inclusiveness-and-transparency-of-political-parties/ Solomon Online: https://www.solomontimes.com/news/advancing-openness-inclusiveness-and-transparency-of-political-parties/12400 Solomon Business Magazine: https://sbm.sb/advancing-openness-inclusiveness-and-transparency-of-political-parties/ The Islands Sun: Attached copy;	Media					



			Solomon Star: Attached copy;						
			Solomon Islands Broadcasting Company: https://www.sibconline.com.sb/advancing-openness-inclusiveness-and-transparency-of-political-parties/						
[VIDEO STORY]	Feb 7	TAP	https://www.facebook.com/UNDPsolomonislands/videos/895683821753725	Facebook Post	258		11		
Investigating corruption with RSIPF									
RSIPF video			https://twitter.com/UNDP_Solomons/status/1622741062682054659	Twitter	206		1		1
RSIPF video			https://www.youtube.com/watch?	Youtube Video					
[PRESS RELEASE] Peer-to-peer learning to strengthen regional anti-corruption and anti-money laundering efforts	Feb 21	TAP	UNDP: https://www.undp.org/pacific/press-releases/peer-peer-learning-strengthen-regional-anti-corruption-and-anti-money-laundering-efforts	UNDP Website Update					
Programme to Foster Cooperation Between Financial Intelligence Units	Feb 21		Solomon Online: https://www.solomontimes.com/news/attachment-programme-to-foster-cooperation-between-financial-intelligence-units/12432 SBM:	Media News					



			https://sbm.sb/peer-to-peer-learning-to-strengthen-regional-anti-corruption-and-anti-money-laundering-efforts/ Solomon Star: Copy attached; Solomon Islands Government: https://solomons.gov.sb/peer-to-peer-learning-to-strengthen-regional-anti-corruption-and-anti-money-laundering-efforts/ The Islands Sun: Copy attached;						
	Feb 23	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid0ej2AGNx3rsc5jaTZ7D5ofD8Jvca6PgZ6cea1KYhceyBLMewoudfvF4MMVH3sW9CjI				66	2	1
Successful prosecution of corruption	March 7	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid02HhJBKS9941oWHjoBHgGWwVmRegaMuHX5vgFxBhznmphtdYDfSVKQ3J1CeAfM5Xsl	Facebook Post			109	2	8
Workshop on the improvement of a transparent financial system	March 8	TAP	https://www.undp.org/pacific/press-releases/beneficial-ownership-transparency-dialogue-counter-corruption-pacific	Website Update					
Beneficial ownership transparency dialogue to counter corruption in the Pacific	March 8	TAP	https://www.undp.org/pacific/press-releases/beneficial-ownership-transparency-dialogue-counter-corruption-pacific	Website Update					
Collaboration among enforcement agencies	March 10	TAP	https://cutt.ly/P8CDwkN	Radio Programme					
			https://www.facebook.com/UNDPSolomonIslands/posts/pfbid0kX4T9zGaTLgacjt51WAb6XJRdmZJidu3r1NSKeH6YbKfxJnHHIRGSLJ3EHTCVw4gI	Facebook Post			20	1	
			https://twitter.com/UNDP_Solomons/status/1634032982947418112	Tweet	506		7		5



			https://soundcloud.com/undp-solomon-islands/undp-odpp-anti-corruption-010323-edited?si=053ffea7f1494ecb8356355759656da3&utm_source=clipboard&utm_medium=text&utm_campaign=social_sharing	SoundCloud Podcast Update	32		1		
Workshop on the improvement of a transparent financial system	March 13	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid02fjf1GLsNXTPbcsuEJj3Zk1jfmhTsvvW3uQELyk8ajHgMajV4Mxngrsee3MqeEaMI	Facebook Post			122	7	6
			https://twitter.com/UNDP_Solomons/status/1635075473196851200	Tweet	1582		28		9
			Solomon Online: https://www.solomontimes.com/news/transparency-dialogue-to-counter-corruption-in-the-pacific/12471 Solomon Government: https://solomons.gov.sb/beneficial-ownership-transparency-dialogue-to-counter-corruption-in-the-pacific/ Solomon Star News: copy attached;	Media News					
Prosecuting corruption with the Office of the Director of Public Prosecutions	14 March	TAP	https://www.undp.org/pacific/news/prosecuting-corruption-office-director-public-prosecutions	Podcast UNDP Website Update					
			https://soundcloud.com/undp-solomon-islands/undp-odpp-anti-corruption-010323-edited?si=053ffea7f1494ecb8356355759656da3&utm_source=clipboard&utm_medium=text&utm_campaign=social_sharing	SoundCloud update					
CDF REFORM ATTRACTS DONOR INTEREST AS UNDP OFFERS USD\$80,000 SUPPORT	March 17	TAP	https://solomons.gov.sb/cdf-reform-attracts-donor-interest-as-undp-offers-usd80000-support/	News Media					
	18 March	TAP	https://www.facebook.com/zfm100/posts/pfbid02vH7bLmwqYQqbAqjAaBVZi9y6deaBEfGMEc78mA5doP2euiTjvayTWZj2ha4L8WicI	Facebook Post			11	1	



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Financial Intelligence Units visit to Cook islands	20 March	TAP	https://twitter.com/UNDP_Solomons/status/1637686653304344577	Tweet	1443		26		8
SIICAC video	March 29	TAP	https://www.facebook.com/UNDPSolomonIslands/videos/542663781384369/	Facebook Video	326		7		
			https://twitter.com/UNDP_Solomons/status/1640862621149609985	Twitter Video	743		7		3
FIU	April 12	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid02FrZ3pKQAcXUjkBD5UmDepY1mQSpNui9HMrzcEnYxZozkxZ6fd7ovaLMm95X7aBahl	Facebook Post			2700	67	7
			https://twitter.com/UNDP_Solomons/status/1646003460867870721		150		2		1
Media Association	May 3	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid0fjzbYasFLmD32TSe7QGiBvdnJvbrSWJaZRNZ3aBShNK8EGWGUpzrbGabpdVmKMCI	Facebook Video	272		12		
			https://twitter.com/UNDP_Solomons/status/165348243528638759	Tweet Video	324		6		2
Provincial Youth Councils and National Youth Congress	May 11	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid0HTbrsSyQrbQFbzaPEoqkvGLDFroJzXPY3JLxqsadTcyUvc9wEQ7JA FwCeXRUV5A3I	Facebook Post			62		
Pacific Conference on Governance"	May 11	TAP	https://twitter.com/SonjaStTr/status/1656412839027015680	Retweet	25	1	25		7
Press Release	May 23	TAP	https://solomons.gov.sb/mou-signed-between-rsipf-and-oag/?fbclid=IwAR1MnYYJeDC4IlbeA41N9yrMhDio5QP079FKR5CzBeJ6MatM89LFTT5ZZKs						
RSIPF and the Solomon Island Office of the Auditor General MOU	May 24	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid0dDenb1XFKtmZjycVygVgxZz4bqbDTusyj8ZsfnEwDDW6ysvJ8zwi mQKpdUeyUKvTI	Facebook Post			6		1
Permanent Secretaries and Senior Executive Officers in Government	May 26	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid07n3T46VBLgPttnvTqsFXHpySnKfn8uaj19tDxVzeMnjShcA7AnUCF jCNwAht4sZlI	Facebook Post			34	1	2



Ministries and Integrity Agencies training			https://twitter.com/UNDP_Solomons/status/1661845042686820353		864	1	14		4
Provincial Youth Councils and National Youth Congress to attend the Pacific Governance Conference 'Pacific Youth Spotlighting Anti-Corruption in Climate Change and Gender Equality' in Auckland, New Zealand	May 26	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid07vnBgJs9cDV9P2xAZ526E7N2xzLoL3zFJ4bLCaMaizwpS7BMSD9EGG8a7yz3NzHJI	Facebook Post			66	21	5
Provincial Youth Councils and National Youth Congress to attend the Pacific Governance Conference 'Pacific Youth Spotlighting Anti-Corruption in Climate Change and Gender Equality' in Auckland, New Zealand	June 8	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid02nhrP84ckrs34MKgLAYHfqQB7Kb4sWLspGTSVLs9M3SVhsStc5MUu9THD2GcSfr7DI	Facebook Post			93	5	15
Anticorruption institutions	June 9	TAP	https://twitter.com/UNDP_Pacific/status/1667043180762759168	Tweet	979		9		5
FIU	June 13	TAP	https://twitter.com/UNDP_Pacific/status/1668453938709008385	Retweet	1223	2	6		7
			https://twitter.com/SonjaStTr/status/1668486754653880320	Retweet	526		9		3
Pacific Anticorruption Regional Conference	July 25	TAP	https://twitter.com/UNDP_Pacific/status/1683654549989638144	Retweet	566		14		6
Pacific Anti-Corruption Regional Conference	26 July	TAP	https://twitter.com/FICAC_Official/status/1684140747573039105	Retweet	422		12		6
Pacific Anti Corruption Regional Conference		TAP	https://twitter.com/UNDP_Solomons/status/1684349586897530883	Tweet Quote	242		4		1



Pacific Anti Corruption Regional Conference	July 30	TAP	https://twitter.com/UNDP_Pacific/status/1685397672260427777	Retweet	2518	2	45		11
Study Tour	Aug 7	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid0rhpFfkaE9cwLN9723t1AtveQDWTYjEKF9T5DUprPkCZHqWc7X21YBMti8GkmEGbCI	Facebook Reshare			27		1
Investigative Training	Aug 21	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid0fEcj1JUySxJnCGVKz9sEC9nQCg2dza8c8VHt1f73tdTf2ijC4Yn9LFaniEx2azVPI	Facebook Post			27		1
			https://twitter.com/UNDP_Solomons/status/1693504753656090798	Tweet	164				
			https://twitter.com/UNDP_Solomons/status/1693505684724412771	Tweet	45				
			https://www.undp.org/pacific/press-releases/solomon-islands-better-face-corruption-related-challenges	UNDP Website Update					
	Aug 25	TAP	https://twitter.com/UNDP_Solomons/status/169486965417772538	Tweet	127		1		
Third meeting of the Pacific Islands Parliaments Group	Aug 22	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid02ZqBYtRVdbaQroNyktfSegLRf2gZvVY88Wa2ijeShBkkoDDqvGNVaSVozeVzmqsgMI	Facebook Post					
	Aug 23	TAP	https://twitter.com/UNDP_Pacific/status/1694148734849020028	Retweet	1041	2	13		9
SIICAC MoUs Signing	Aug 25	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid026E43b7KpmY52L6qbjMHYyVudeKHbY8f4JuwkNS3Y63CDoo8FSxdP6nvKU8wxZ7Pml	Facebook Post			54		7
			https://twitter.com/UNDP_Solomons/status/1694846789227323599	Tweet	1224	2	9		4
UN Volunteers Opportunity	Aug 25		https://www.facebook.com/UNDPSolomonIslands/posts/pfbid02aZEBqDRmBKAIryhf1Mhmvm63VVTAD7CxxCpoJLnQjnbpSL8aFZqSZdsJ82WXftAI	Facebook Reshare			34		2
Investigative Training	Aug 25		https://www.facebook.com/UNDPSolomonIslands/posts/pfbid09NeqfxW4bvVWBdY673t3N44h8N3LxcUD8uzMUuU4Geop7HWC	Facebook Post			47	2	3



				M4AQBjXktkjg8ptTbI?__cft__[0]=AZX1r_dLYLXnAbqEScxZeofUs7C9OUFmSBM5PdG5JtQXayKCjDNFHIx3TLZ62I3hmoTk1nJ8tyP-QKdHMYd6FgodxHjMK-z9NPubtL63ah-2hl1bb5Jp_jIuvNL7Wjwi5ZPMGthfkbHvaA0rzOTSNW4UcqsJgYFfyWunlwJpwKs0hjW182FCTmnlSgh48zcZ6KE&__tn__=%2CO%2CP-R						
SIICAC MoUs Signing	Aug 28	TAP		https://www.undp.org/pacific/press-releases/mou-signing-pave-way-strengthening-coordination-improved-anti-corruption-results	Website Update					
				https://twitter.com/UNDP_Solomons/status/1696011193629258203	Tweet	1023	1	7		3
NACS Review	Aug 28	TAP		https://www.facebook.com/UNDPsolomonislands/posts/pfbid026zPhaA7DrCZf9cW3RGS39LgswxdizUKSEmLx4QfXJVavzxWGJyK3o7mA6pVqe3AQI	Facebook Post			15	1	1
Building Accountability in SOI	Aug 30	TAP		https://www.facebook.com/UNDPsolomonislands/posts/pfbid033jErX9eWKSpgKn3zLQ6muwCzZmy2zY1ifiuQJd9FEwVc7rZwYL UHCoWUjakhAPAAI	Facebook Post			22		5
				https://www.undp.org/pacific/news/building-accountability-solomon-islands	UNDP Website Update					
	Aug 31	TAP		https://twitter.com/UNDP_Solomons/status/1697000191726113061	Tweet Thread (4)	467		15		3
SIFIU video part I	Sep 20	TAP		https://l.facebook.com/l.php?u=https%3A%2F%2Fwww.youtube.com%2Fwatch%3Fv%3D4MfZAF8d5E&h=AT3USRpUsPZZKWWTUSmQ7RXO4Rp514IU6Hp6A_-7yOFopdShvYhC-51am7NSLy1Y_Q0Y2VfWuKeQJIMNwNiyK7KPBO66Tjh_-IMQfcpcIbJUuPgWq2MocNaqewaklak9QKoGEK4&s=1	Facebook			2		1
				https://www.youtube.com/watch?v=T4MfZAF8d5E	Youtube					
				https://x.com/UNDP_Solomons/status/1704328483953111229?s=20	Twitter	405		2		2



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Anti-corruption for the youth workshop in Gizo	Oct 5	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid02nNU3FBNRSBXQeRXgQXgQhEwEMReHCuhtNGPVv1C5Regt4SYCmYHuW33xbvKMDgC6l	Facebook			20		3
			https://x.com/UNDP_Solomons/status/1709849299373445134?s=20	Twitter 2/2	119		4	1	
SIFIU video part II	Oct 13	TAP	https://l.facebook.com/l.php?u=https%3A%2F%2Fwww.youtube.com%2Fwatch%3Fv%3DmGpiwe9eYco&h=AT2UE99mriThp-2YhCW-IGfOO6kp2TliZCS0FFNqzlaCFBUoGjunyycHgeN8aAfVf0uT3uNICmhjkyn-vZAOnBN_imky9Ehqnni1YzEDCmljsNe-hOBeiVG0G2sicsfzyb92ZNY&s=1	Facebook			14	2	
			https://www.youtube.com/watch?v=mGpiwe9eYco	Youtube					
			https://x.com/UNDP_Solomons/status/1712637388726669615?s=20	Twitter	136		1		1
Anti-corruption for the youth workshop for Honiara City Council and Renbel	Oct 18	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid0oPfECFLS3WBnd9NJqLeDUe7ToHvsP1kybNqjFq7Z4wPjgiJ1k5NPrZjw6PPD1JG1l	Facebook			34	1	4
			https://x.com/UNDP_Solomons/status/1714417933919961213?s=20	Twitter	150		2		1
Anti-Corruption for the Youth Workshop in Auki	Nov 21	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid0y1PvBGmTEEJiUyu8AFgBfzA7evxbHLkMr9AWkUZmehV9N9P4qrh6Q21K4tRZLLD3l	Facebook			4		
			https://x.com/UNDP_Solomons/status/1726854011113070972?s=20	Twitter 2/2	228		4	1	1
Anti-Corruption for the Youth Workshop in Auki Closing	Nov 23	TAP	https://www.facebook.com/UNDPSolomonIslands/posts/pfbid0SmGDa2DPkkY2Zzk1ECB6AVKHWRwXdbC9qbkUjJHAivzTx9ngJVk6RNejgHTEjz4X3l	Facebook			9	1	
			https://x.com/UNDP_Solomons/status/1727559516747977132?s=20	Twitter	98				



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Anti-Corruption for the Youth workshop by Solomon Kalu, training	Dec 6	TAP	https://www.undp.org/pacific/blog/empowering-future-youth-led-battle-against-corruption-solomon-islands?fbclid=IwAR1XStAZ5uWEkJE72NtCrQk_SxSXjr6i6TCV4MgBRBrqJxwWcwH780UQC3Q	UNDP Website					
International Anti-Corruption Day Solomon Kalu experience on training anti-corruption for youth	Dec 9	TAP	https://l.facebook.com/l.php?u=https%3A%2F%2Fwww.undp.org%2Fpacific%2Fblog%2Fempowering-future-youth-led-battle-against-corruption-solomon-islands&h=AT1FTrADfK5FWwhc6hq1QojjBTI-5vHldFbOaaJAgnHPKF_HSR2AeELpiDCXd3PIJLChLjbuzHSFnrMQ3e0zHNubrBPSrGyo321FkfKIPTnAhI9_kQGDmMgFqJ9xuYz2-1vog7A&s=1	Facebook					
			https://x.com/UNDP_Solomons/status/1733644856910860304?s=20	Twitter					



Project Risks and Mitigation Measures

Event	Cause	Impact	Risk Owner	Risk Treatment
scale and scope of institutional and capacity building supported offered under the project for SIICAC limited	Delays in the recruitment of SIICAC	Likelihood: highly likely Impact: immediate Risk Level: high	Programme Manager, UNDP DG, SIICAC Anti-Corruption Secretariat, OPMC	Support SIICAC to finalise its organisation structure, develop its TOR for all vacant position, prepare the induction packages, manual and procedures for the new office
scale and scope of institutional and capacity building supported offered under the project for SIICAC limited	Internal dynamics within SIICAC impacting on the scale and scope of the institutional and capacity development supported offered	Likelihood: moderately likely Impact: immediate Risk Level: high	Programme Manager, UNDP Anti-Corruption Secretariat, OPMC	Hold continuous dialogue with members of the Commission, with OPMC to clarify toles and responsibilities. Host exchange with other established ICACs to study institutional arrangements, clarify roles and responsibility, strategic directions
Complaint handling mechanism for corruption reporting not in place	Delays in the institutional set up of SIICAC to enable it to receive, assess, investigate complaints, including implementing integrity officer functions	Likelihood: moderately likely Impact: immediate Risk Level: moderate	Programme Manager, UNDP DG, SIICAC Anti-Corruption Secretariat, OPMC	While SIICAC finalises its recruitment project, in parallel, project to develop manuals, procedures for complains handling, establish complains register, prepare trainings package for handling, assessing, investigating complaints.
Activities linked to the NACS implementation limited in scope and scale	Delay in the finalising of the updated NACS 2024 – 2027 and accompanying Action Plan	Likelihood: moderately likely Impact: intermediate Risk Level: moderate	Programme Manager, UNDP integrity institution Anti-Corruption Secretariat, OPMC	Strategize with various partners, stakeholders to jointly identify, design, implement activities that contribute to corruption prevention, inline with the intent of the design of prodoc to support NACS implementation, support Government meet its obligation under the UNCAC and 2018 Anti-corruption Act.



integrity space is fairly crowded with a high number of institutions working in the space and lacking coordination.	No formal coordination mechanism established and functioning (IGF)	Likelihood: moderately likely Impact: low Risk Level: moderate	Programme Manager, UNDP integrity institution Anti-Corruption Secretariat, OPMC	Integrate into the implementation of activities opportunities for dialogues amongst integrity agencies to promote information sharing, joint planning, joint activity implementation. Project to organise joint trainings, activities to foster trust building leading to cooperation.
slows legislative and institutional reforms	Reform not high on legislative reform agenda of Government	Likelihood: moderately likely Impact: moderate Risk Level: high	Programme Manager, UNDP integrity institution Anti-Corruption Secretariat, OPMC	Hold policy dialogues in partnership with Integrity institutions for relevant stakeholders from Govt, CSOs to create the buy-in for reforms.
Lack of Corruption Risk assessments in the key sectors of the economy	Little appetite on partner Ministry to identify and pro-actively address these gaps	Likelihood: moderately likely Impact: moderate Risk Level: moderate	Programme Manager, UNDP Anti-Corruption Secretariat, OPMC	Repackage the corruption risk assessment methodology and instead use the ethics and integrity assessment framework, to unpack corruption risk areas in key sector of economy and work jointly with sector to develop appropriate response plans.

Key Lessons Learned

After two years of COVID19 impacting other Pacific Island countries, UNDP and the Project team were better prepared to respond to the impact of COVID-19 lockdown in Solomon Islands, Lessons learned in other countries regarding the use of online technologies to access expertise were much more easily applied, and the Project team and counterparts were already generally well-equipped to harness tools like Zoom and SharePoint to facilitate knowledge sharing.

It remains an important lesson in the context of all anti-corruption programming that it remains important to keep a close watch on political issues both at the high-level strategic level and the operational level. To that end, the Project team has worked to develop close partnerships with key counterparts in the PMO, to try to ensure that the Project can identify



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and understand possible political implications of reform proposals and institutional coordination challenges.

The Project has also learned lessons from the UNDP Regional AC Project, regarding how to more efficiently utilise and access expertise, both through rostered consultants and by more systematically engaging in partnerships with institutional experts, namely the Fiji, South Australian and NSW ICACs. The Project is actively developing MOUs with partners, to make such engagements less ad hoc and to encourage sustainable knowledge partnerships over time.



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Interim Financial Report as of 05 December 2023

Output Description	ACTIVITY ID	2019	2020	2021	2022	2023	Total (2019-2023)
The institutional framework governing transparency, accountability and anti-corruption in Solomon Islands strengthened.	1	\$ 99,538.31	\$69,818.06	\$ 81,093.54	\$ 420,241.45	\$585,421.47	\$1,218,612.83
Prevention mechanisms consistent with NACS to limit leakages, maximize resources effectiveness and improve service delivery supported.	2	\$ 233,381.95	\$204,648.85	\$ 56,491.04	\$ 19,988.25	\$425,545.83	\$940,055.92
Civil society, private sector and citizens of Solomon Islands' capacity to build coalitions and conduct accountability activities and integrity advocacy work is supported in line with the NACS	3	\$0	\$0	\$ 14,739.53	\$ 191,599.26	59,910.73	\$266,249.52
Project Management Costs including GMS, DPC	4	\$ 18,520.74	\$3,980.43	\$ 235,447.25	\$ 280,650.14	136,715.41	\$675,313.97
TOTAL Expenditure in USD		\$ 351,441.00	\$ 278,447.34	\$ 387,771.36	\$ 912,479.10	1,207,593.44	\$ 3,100,232.24



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Overview of Expenditure by donor to the project as of 5 December 2023.

Donor

UNDP	134,899.58
Government of Solomon Islands	207,351.22
Government of Japan	861,792.24
British High Commission	3,194.42
	1,207,227.46

Overview of Financial Resources Provided to the project.

Donor	Local Currency based on signed donor contribution	USD Equivalent of cash received by project	% share of total budget
UNDP	624,626 USD	624,626.00	20%
Government of Solomon Islands	5,322,577 SBD	650,041.14	21%
Government of Japan	189,000,000 Yen	1,763,909.63	58%
British High Commission	44,000 Pounds	52,877.78	2%
		3,091,454.55	100%