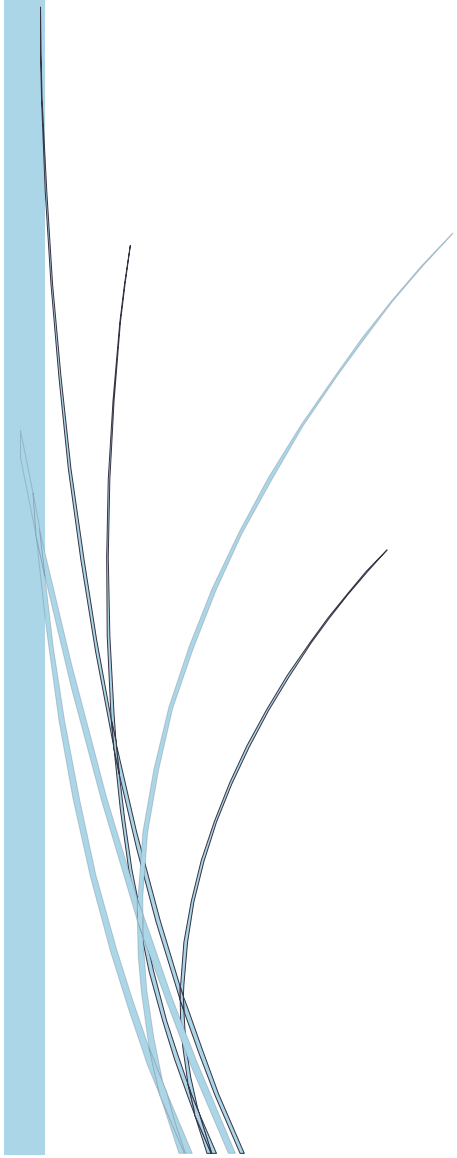


2023

AUDIT REPORT



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ABBREVIATIONS

ATIA	Access to Information Act
ATI	Access to Information
HOIH	Head of Information Holder
IO	Information Officer
Info Com	Information Commission
MDA's	Ministries, Department, and Agencies

BACKGROUND

Introduction

The Information Commission (InfoCom) is a neutral and independent body responsible for enforcing and promoting compliance of the Access to Information Act, 2018 (ATIA). Section 56 of the ATIA bestows auditing powers to the InfoCom to assess compliance with this Act. These powers under subsection (1) includes the power to:

- Conduct inspections;
- Undertake any investigation it deems appropriate in the furtherance of the audit;
- Engage with the staff of the body;
- Request copies of any information; and
- Access any information it deems necessary to undertake the audit.

This report is a summarized compilation of ATIA compliance audits performed in 2023 on a selected number of public bodies broadly classified as Ministries, Departments, and agencies (MDA's) as well as civil society organizations financed directly or indirectly by the Government of Seychelles. The Information Commission conducted these compliance audits for the second time and they were performed during an audit cycle from April 2023 to September 2023. The terminology 'compliance audit' in this context is defined as an independent external evaluation by the InfoCom on these aforementioned organizations vis-a-vis the law, rules, regulations and guidelines pertaining to this Act. The report highlights our main findings and recommendations.

Purpose

- 1) Assess and understand how the ATIA is being implemented across public bodies and guide effective practices and policies;
- 2) Ensure systematic independent monitoring of the ATIA across public bodies;
- 3) Produce an evidenced based and objective assurance of findings and recommendations;
- 4) Support ongoing ATIA regulation compliance, awareness and capacity building efforts.

Target Audience

This report is intended for both an outward and inward facing audience at two distinct levels.



Audit Team

The team responsible for the strategic development and execution of the compliance audits comprised of the following individuals:

- ★ Ms. Mina Accouche, Information Analyst/Auditor, as the primary lead investigator.
- ★ Ms. Thereza Dogley, Chief Executive Officer, as the reviewer.
- ★ Ms. Mumtaz Hasan, Mr. Antonio Lucas and Mr. Desire Payet, Chief Information Commissioner and Commissioners, as the steering committee.

AUDIT SCOPE

The timeframe that the compliance audits encompassed was for the period 2018–2022, from the start of the Act to the most recent completed calendar year over a period of 6 months of fieldwork in 2023.

The areas of regulations covered were the broad length of the ATIA ranging from:

- Determining compliance and monitoring of Section 4, 5, 7, 9, 11, 12, 13, 14, 33, 34 and others.
- Testing and assessing the integrity of prior Section 54 Annual Reports submitted.

The design and depth of the compliance audits extended to site evaluations and desk reviews of policies, processes, procedures, files and documentation. The main participants were the designated IO's and HOIH's of selected organizations.

Special Note:

1. *This report does not include investigative audits conducted separately as a result of appeal cases filed with the Commission.*

METHODOLOGY

Processes

The procedures for performing the compliance audits comprised the following key stages:

Stage 1 Internal Planning

- Identifying MDA's, setting audit procedures and timeframe.

Stage 2 External Notice and Preparation

- Approximately two weeks official written notice to MDA's and entry meetings.

Stage 3 Assessment

- Site and desktop reviews, testing, 1 to 1 meetings and follow ups.

Stage 4 Exit and Conclusion

- Final feedback, compilation and publication of report.

The investigator and reviewer undertook short visits to the various organizations and conducted interviews with the IOs as well as key staff to observe current practices and procedures currently in place. A desk-based review approach was adopted, and different monitoring practices were used, such as testing the system when requesting information about a third party. Audits involved the use of questionnaires, person-to-person interviews with IOs and HIOHs, various sampling methods, and the review of files.

Evidence was obtained to support compliance with the Access to Information Act, and where non-compliance with the Act was observed and any weaknesses identified, the auditor provided the relevant recommendations. At the end of the audit, each organization was given an overall assurance rating, ranging from high assurance to very limited assurance. The audit, however, does not guarantee absolute accuracy in the detection of every non-compliance with the Act.

Organizations Audited

The following 21 organizations were selected to be audited out of which only 19 could be audited. This was due to two organizations being unresponsive for the performance of the audit. These were the Department of Police and the Department of Immigration & Civil Status. The Commission will take this up in future year's audit.

- 1) *National Sports Council*
- 2) *Seychelles Licensing Authority*
- 3) *Seychelles National Youth Council*
- 4) *Agency for Social Protection*
- 5) *Central Bank of Seychelles*
- 6) *Development Bank of Seychelles*
- 7) *Fair Trading Commission*
- 8) *National Assembly*
- 9) *Agriculture Department*
- 10) *Seychelles Commercial Bank*
- 11) *Department of Police*
- 12) *Department of Immigration & Civil Status*
- 13) *Seychelles Fishing Authority*
- 14) *Seychelles Revenue Commission*
- 15) *National Tender Board*
- 16) *Housing Finance Company*
- 17) *Judiciary of Seychelles*
- 18) *Industrial Estate Authority*
- 19) *Canoe Association*
- 20) *Department of Environment & Climate Change*
- 21) *Property Management Corporation*

Selection Criteria

Organizations were chosen based on the following criteria:

- Discrepancies observed in the figures being reported in the Section 54 Annual Report.
- Volume and nature of complaints.
- Tip-offs received from members of the public about the inaccuracy of records being received and difficulties accessing their records.
- Statistical random selection in categories related to budget amounts received.
- Diverse cross section of type of organization with a minimum of one or two association/federations.

RATINGS, FINDINGS AND RECOMMENDATIONS

This area of the report summarizes and pinpoints significant deficiencies in internal controls, material weaknesses, risks and recommendations to support effective targeted preventative and corrective measures.

The table below illustrates the assurance ratings awarded to the organizations at the end of our audit processes.

Public Body or Organization (as defined by the ATIA)	High Assurance	Reasonable Assurance	Limited Assurance	Very limited Assurance
National Sports Council				
Seychelles Licensing Authority				
Seychelles National Youth Council				
Agency for Social Protection				
Central Bank of Seychelles				
Development Bank of Seychelles				
Fair Trading Commission				
National Assembly				
Agriculture Department				
Seychelles Commercial Bank				
Seychelles Fishing Authority				
Seychelles Revenue Commission				
National Tender Board				
Housing Finance Company				
Judiciary of Seychelles				
Industrial Estate Authority				
Seychelles Canoe Association				
Department of Environment & Climate Change				
Property Management Corporation				

Special Notes:

1. The assurance ratings were awarded based on professional judgement and several variables, such as whether the public body followed all due procedures and relevant sections of the Act or how available it was to retrieve information.

1. National Sports Council (NSC)

The mandate of the National Sports Council is to enhance the quality of physical education and school sports in all educational and sports institutions.

a) Findings

An audit of the ATI records and documents of the council was undertaken, and the matters arising were communicated to the management. The National Sports Council has been more responsive to the auditing process this year and even scored a higher rating from last year's audit. The audit observed inadequate records and lack of source documentation to support the figures reported in the annual report submitted to the Commission.

From the issues identified, the management in response decided to identify a new personnel to appoint as Information Officer.

During the audit, good practices has also been observed:

1. *NSC's management are undertaking remediation efforts for non-compliance areas identified during the audit. Despite many challenges being faced, such as lack of records being maintained, the council has digitalized some of its records and has kept soft copies for all of its accounting related documentation.*

b) Recommendations

- *Improvement and better control of the environment for record keeping.*
- *Documents should be filed in a systematic and methodical way to avoid compliance risks.*
- *NSC should have a fully functional website for the proactive disclosure of information.*
- *All missing source documentations should be located and filed accordingly.*

2. Seychelles Licensing Authority (SLA)

The mandate of the Seychelles Licensing Authority is to facilitate business socio-economic development through issuing and enforcement of the Licenses Act and License Regulations to create an enabling environment for sustainable business development in Seychelles.

a) Findings

It was difficult to ascertain whether SLA was compliant to various sections of the Act since the incoming information officer was not able to provide sufficient documentation from the outgoing information officer's records. An audit examination of the records showed that information requests being receive by law enforcement agencies were being treated as an ATI request, in turn this has inflated the figures reported in the annual report and was not an accurate view of requests being received by the

Authority. It was also difficult to confirm whether the requestors received the information being requested due to missing source documentations.

During the audit, good practices has also been observed:

1. *The Information Officer and CEO ensures that the education and process of the ATI law is done appropriately at all times. Sensitization program was organized for both the management and staff, and was conducted frequently with the Infocom.*
2. *The Authority is proactively disseminating information on their website and is working on ways of how to make the website more user friendly.*

b) Recommendations

- *SLA should take the necessary step to have a proper filing system to facilitate access to information.*
- *Documents should be referenced and filed in a systematic manner for ease of reference in the future.*
- *Information Officer should be familiar with Section 63 and Section 67 of the ATIA to understand the importance of compliance.*

3. Seychelles National Youth Council (SNYC)

The mandate of the SNYC is to represent the shared interests of youth organisations and uses its collective expertise to act on issues that impact on young people.

a) Findings

SNYC has been more responsive during this year's audit as opposed to the previous year. The Council however, has not been able to provide source documentation such as ATI requests and notice of extension to the requestor. The missing documentations gives doubt to the accuracy and completeness of the statistics being recorded by SNYC.

Prior year's audit recommended the retrieval of lost information from 2018. The management response is that they are now moving towards digitalising their records.

During the audit, good practices has also been observed:

1. *The SNYC scored a higher rating for this year's audit as opposed to the last year. The Information Officer attended the annual practical refresher training and showed much interest.*
2. *The Council is yet to find preventive ways of how to minimise the impact of loss documentation through its various restructuring done over the past years, but is on the right track of starting to digitalize its records to prevent loss of future data.*

b) Recommendations

- *SNYC should make a review on the records at hand, lost records and work on how to prevent loss of data and time to search for documents.*
- *Documents should be filed in a systematic and methodical way to avoid compliance risks.*
- *The Commission recommended digitalizing records to prevent loss of documentation.*
- *Retrieve and make available the information for the year 2018.*

4. Agency for Social Protection (ASP)

The mandate of the ASP is to ensure the provision of comprehensive social security services and social relief against vulnerability within the constitutional framework of Seychelles.

a) Findings

Out of the 28 documents tested, 15 associated documentations were missing which was needed to ensure the accuracy and completeness of the ATI requests dealt with since 2018. The Agency for Social protection resolved the majority of these findings although not in its entirety, by providing the missing evidential documentations and providing the necessary responses with proof as requested. Transfers made to other public orders were also not in compliance to section 13 of the Act.

The agency however has agreed to have a methodological filing system in place to ensure that its information is maintained in a manner which would facilitate access to information.

During the audit, good practices has also been observed:

1. *The Information Officer and CEO ensure that the education and process of the ATI law is done appropriately at all times. Sensitization program was organize for both the management and staff is conducted frequently with the Infocom.*

The agency faces many weaknesses, one being that requests being received are not being addressed to the information officer directly and in turn delays the response process.

b) Recommendations

- *Transfers of information request should be made within five days from the date of receipt and the requestor should be immediately notified of the transfer in writing.*
- *IO should maintain a log, update records of all requests received related to the ATIA, and be able to provide details accurately.*
- *Documents should be referenced and filed in a systematic manner for ease of reference.*

5. Central Bank of Seychelles

The Central Bank of Seychelles aims to promote domestic price stability and advise the government on banking, monetary and financial matters, including the monetary implications of proposed fiscal, credit policies or operations of the Government.

a) Findings

An audit examination of the records of CBS showed one instance where responses provided to the requestor was not in compliance to S11 of the Act and responses not being made in writing. Overall, the audit observed satisfactory procedures in place to ensure compliance to the Act although there are areas for improvement.

b) Recommendations

- *Familiarisation with relevant sections of the Act to observe compliance in all instances.*

During the audit, good practices has also been observed:

1. *Information Officer received internal support with the legal department.*
2. *The bank has a dedicated space relating to ATIA on their website, which allow members of the public to fully exercise their rights under the Access to Information Act.*

6. Development Bank of Seychelles

DBS was established in 1977 as a development finance institution with a specific mandate to assist in the economic development of the Seychelles. This Decree entrusted DBS the power of local and external borrowings for financing financially and economically viable projects in the sectors of the economy, mainly Agriculture, Fisheries, Industry, Tourism and Service.

a) Findings

The audit performed at the Development Bank of Seychelles identified some scope for improvement to reduce the risk of non-compliance with the Access to Information Act. A few documents could not be located, the management in responses provided the necessary missing documentations and took on the audit's recommendations to finding ways to store records to limit loss of data.

During the audit, good practices has also been observed:

1. *The bank has the necessary procedures in place to ensure that third party requests is being dealt with as per the relevant sections of the Act, and also has a fully functional website which provides details about access to information.*

b) Recommendations

- *Maintaining all requests received with all its associated responses to requestors and third parties.*
- *Maintain hard copies as well as soft copies.*

7. Fair Trading Commission (FTC)

The FTC aims to safeguard the interests of consumers, promote competition and fair trade in Seychelles to benefit consumers, businesses, and the economy.

a) Findings

The audit reviewed all ATI records since 2018 to 2022 for each requests made. Inspection also included direct communication with both the information officer and the head of information holder to ask questions as needed to gather additional information as necessary. Observations consisted of evaluating whether the information officer was compliant to various sections of the Act. From tests performed, several documents could not be located and the audit sighted a discrepancy between the figures reported in the annual report submitted and the records provided to the Commission.

The management in response provided many source documentations that we found to be missing from the IO's file.

During the audit, good practices has also been observed:

1. *The Information Officer receives support from the management and other staff members, and is proactively disclosing information to members of the public on a daily basis.*

The Commission however faces the challenge of providing up to date statistics and providing accurate information to the Information Commission.

b) Recommendations

- *The FTC should document how they will monitor adherence to the requirements set out in the ATIA and ensure compliance with these requirements through routine and regular physical compliance monitoring checks.*
- *IO should update and make available all missing records identified as soon as reasonably possible.*
- *Documents should be filed in a systematic and methodical way to avoid compliance risks.*

8. National Assembly

The functions of the National Assembly of Seychelles include making and passing laws, taking up a critical oversight role to check on the actions, state finances and policies of the Executive.

a) Findings

The audit used sampling to obtain sufficient appropriate audit evidence in the compliance audit performed at the National Assembly. The key elements of this are a desk-based review of selected policies and procedures, interviews with selected staff, and a review of source documentations.

The audit sighted 28 documents from the samples chosen, were the evidential documents were missing. It was difficult to confirm whether the requestors received the requested information within the specified timeframe specified by the Act.

During the audit, good practices has also been observed:

1. *The National Assembly has an active website, that proactively disseminate majority information which will allow members of the public to fully exercise their rights under the Access to Information Act.*

b) Recommendations

- *Where weaknesses were identified recommendations have been made, primarily around enhancing existing processes to facilitate compliance with the ATI Act.*
- *The Assembly should ensure that there are necessary measures in place for all systems to allow monitoring of documents that were found to be missing in the information officer's records.*

9. Agriculture Department

The department is responsible for the implementation of agricultural programs and strategic projects that support the enhancement of national food and nutrition security, facilitate the increase of the contribution of agriculture in GDP and key socio-economic indicators, and facilitate the development and modernization of the sector.

a) Findings

The Commission attempted to perform an audit at the Agriculture Department for the second time, however, after the entry meeting conducted with the Information Officer and the Principal Secretary, no further communication was received despite the Commission's attempt to obtain the records.

Our work was hindered by the lack of cooperation and challenges in obtaining information from the information officer. The department had no audit trail of requests received since 2018, and no attempt was made to retrieve electronic copies. Since the

auditor was unable to obtain sufficient appropriate audit evidence, it was difficult to ascertain that Agriculture Department was in compliance with the ATIA. Non-compliance could lead to a loss of public trust, fines and penalties, and reputational damage.

During the audit, good practices has also been observed:

1. *The Agriculture department has experienced an increased ATI requests which shows that members of the public are more aware of the ATIA and their right to information.*

Due to the unavailability of the Information Officer, the audit could not confirm whether all information requests were dealt with according to the relevant sections of the Act.

b) Recommendations

- *Improvement and better control of the environment for record keeping.*
- *Documents should be filed in a systematic and methodical way to avoid compliance risks.*
- *The Commission recommended digitalizing records to prevent loss of documentation.*
- *The HOIH in consultation with the minister of the department could designate a suitable information officer.*

10. Seychelles Commercial Bank

The Seychelles Commercial Bank formerly known as Seychelles Savings Bank presently conducts fully fledged Commercial Banking activity under the Financial Institution Act, 2004, as amended and seeks to meet fully and efficiently all the banking needs of all its customers.

a) Findings

An audit of the ATI records and documents of the bank was undertaken with an emphasis on personal information, especially those made by a third party.

The bank was found to be non-compliant in a few instances where either relevant documents were missing or there was missing proof of extension. Although there was no management response given from the findings issued, the bank was found to be in compliance to releasing personal information of third parties and commercial and confidential information.

During the audit, good practices has also been observed:

1. *The bank has a dedicated space relating to ATIA on their website, which will allow members of the public to fully exercise their rights under the Access to Information Act.*
2. *The IO undertakes due diligence for each requests received related to third party requests.*

b) Recommendations

- *Documents should be filed in a systematic and methodical way to avoid compliance risks.*
- *Information should be provided within the appropriate time-frame.*
- *Requestors should be made aware of any delay in reply, and any responses given should be one within the appropriate time scale.*

11. Seychelles Fishing Authority

The Seychelles Fishing Authority (SFA) was incorporated on 31st August 1984 by the Seychelles Fishing Authority (Establishment) Act, it was created to develop the fishing industry to its fullest potential and to safeguard the resource base for sustainable development.

a) Findings

The audit observed a lack of understanding from the information officer on what type of information should be classified as an ATI request, this could result in an overstatement in the figures reported in the annual report. Observations were also made with regards to missing documentations.

The Authority is also experiencing fungus infestation, which could result in loss of data, and searching for information over the coming years will prove to be very tedious and pose health risks.

During the audit, good practices has also been observed:

1. *The Authority has dedicated a space on its website called FIMS for proactively disclosing information and added a further section for the ATIA. Under FIMS one can find various information about how fisheries is being managed.*

The Authority has been unable to recruit an Information Officer for some time now, and all information requests are currently being handled by the HOIH.

b) Recommendations

- *The Authority should ensure that staff get the appropriate training, especially in records management for both physical and electronic copies. This should involve any new information generated as well as any transfer of files and documents.*
- *Although no responses were received from management, the audit presented its recommendations to the Authority where appropriate.*
- *Missing records should be updated immediately.*

12. Seychelles Revenue Commission

The SRC is responsible for the administration of revenue laws in the Seychelles, under the Act, and is mandated to operate as an independent authority with the responsibility of conducting its affairs in a transparent and efficient manner.

a) Findings

The SRC was found to be in compliance with the majority of the documents tested although there was room for improvement in certain areas. Out of the 58 documents tested, 16 was found to be missing relevant associated documentations which would enable the audit to confirm whether the request was dealt with within the appropriate timeframe specified by the Act. The audit observed requests being made under law enforcement agencies being treated as ATI requests. To address this, areas for improvement was recommended to SRC.

During the audit, good practices has also been observed:

1. *The SRC has an active website, that proactive disseminate majority information which will allow members of the public to fully exercise their rights under the Access to Information Act.*
2. *The Information Officer provided information as per relevant sections of the ATIA.*

b) Recommendations

- *Documents should be filed in a systematic and methodical way to avoid compliance risks.*
- *Transfer requests should be completed within 5 days of date of request where the information is not held by SRC.*
- *Requestor should be made aware of any delay in reply, and any responses given should be done within the appropriate time scale.*

13. National Tender Board

To promote the values of integrity, fair competition and good governance in the public procurement system of the country.

a) Findings

The audit sighted 6 instances where records were found to be missing and two transfers not made in conformity with the relevant section of the Act. From the documents tested, it was seen that failure to observe compliance was mostly due to the information officer being unaware of the roles and responsibilities required of an information officer. Issues raised has been shared to the management with accompanying recommendations.

During the audit, good practices has also been observed:

1. *The Information Office attended to information requests within the appropriate timeframes as specified by the Act.*

b) Recommendations

- *Perform a reconciliation between all missing documents and the annual report submitted to the InfoCom and ensure accuracy of information reported.*
- *Information requests should be provided within the appropriate timeframe to avoid any offences.*
- *The management should continue to monitor compliance with the ATIA to ensure the information officer follows the recommendations and retain acceptable documentation to support the figures being reported in the annual report.*

14. Housing Finance Company

The Housing Finance Company is exclusively owned by the government and is mandated to support the lower and middle-income earners in the society to purchase or construct their house.

a) Findings

The HFC was found to be in compliance with the majority of the requests being received, except for a few issues raised to management. The management in response provided proof of missing documentations and explanations to the audit queries raised.

During the audit, good practices has also been observed:

1. *The IO keeps records of proper source documentations and evidential documents.*

b) Recommendations

- *HFC should continue to monitor compliance with the ATIA through its current policies in place, so as to ensure that the information officer continues to follow acceptable guidelines and the relevant source documentation to support the information being held.*
- *Procedures in place to ensure that there's no oversight on documents being requested.*

15. Judiciary of Seychelles

The Judiciary's mission is to effectively and competently administer justice in accordance with the Constitution and laws of Seychelles in a timely, impartial and independent manner.

a) Findings

The auditor observed an unreconciled balance between the annual reports submitted to the Commission and the records provided. The annual report for the year 2022

stood at 56 requests, however, only 6 records in hand could be sighted. The management in response informed the Commission that the outgoing information officer was unaware of the requirement that requests must be made in writing. The audit has provided its recommendations to improve existing arrangements and reduce the risks of non-compliance to the Act.

During the audit, good practices has also been observed:

1. *The continuous effort by the management to ensure that they comply with the law.*

b) Recommendations

- *The information officer should maintain all relevant documentations related to ATI requests.*
- *Solutions to be implemented to meet the auditor's recommendations.*

16. Industrial Estate Authority

The Authority was established in 2013 and has the power to rent or lease immovable properties belonging to the Authority and collect fees for the facilities or services.

a) Findings

An audit of the Access to Information records and documentation was undertaken for the years 2018–2022, with an emphasis on record keeping and compliance with responses to requests received. Eight documents tested was missing relevant associated documentation to ascertain compliance to the Act. Due to the information officer's absence, the IEA failed to provide any responses from the audit queries raised, however, recommendations have been provided to ensure that the authority is being in compliance to the Act.

During the audit, good practices has also been observed:

1. *The Information Officer demonstrated the relevant knowledge to perform her work satisfactorily and found to be compliant to directives given by the InfoCom.*

b) Recommendations

- *Procedures in place to ensure that there is a constant flow of information when both the HOIH and the IO is not available.*

17. Seychelles Canoe Association

The Seychelles Canoe Association aims to develop canoeing as a sport for fitness, leisure and competition in Seychelles.

a) Findings

The association encountered many challenges in record keeping over the past years as all of its members are working part time on a voluntary basis.

The auditor observed a lack of procedures in place to ensure that information was being provided within the appropriate timeframe and various members were attending to information requests, hence the information officer failed to capture the requests being received. It was also observed that the association has not been able to provide proper and complete records to support the figures submitted in their yearly annual report. The audit has highlighted several recommendations to ensure compliance to the Act.

During the audit, good practices has also been observed:

1. *The continuous effort the management trying to ensure that they comply with the law.*
2. *Volunteers taking the initiative to obtain additional space for storage of source documents.*

b) Recommendations

- *The information officer should maintain a log of all requests received related to the ATIA, and be able to provide details accurately.*
- *Procedures in place to ensure that there is a constant flow of information when the HOIH and the IO is not available.*

18. Department of Environment & Climate Change

The Climate Change Division has the responsibility to coordinate climate change issues, implement the National Climate Change Strategy, the Seychelles Sustainable Development Strategy and the international climate change cooperation and global Negotiations.

a) Findings

The department has only been able to provide records related for the year 2022 only. The audit will be taking up the rest of the records in future audits to monitor compliance to the Act. Out of the 20 documents tested, several documents were found to be missing; in turn, the audit could not confirm the accuracy and completeness of the documents.

It was also noted that transfers of documents were not being made in compliance to section 13 of the Act.

During the audit, good practices has also been observed:

1. *The Information Officer demonstrated the relevant knowledge to perform her work satisfactorily.*

b) Recommendations

- *Improvement and better control of the environment for record keeping.*
- *Documents should be filed in a systematic and methodical way to avoid any loss of documentations*

19. Property Management Corporation

The mandate of PMC (Property Management Corporation) defined under the 2004 Act is to:

- * **Ensure the equitable provision of living accommodation for the people of Seychelles by sale, lease or rental of flats and houses in accordance with the Policy of the Government**
 - * **To manage and maintain buildings and other properties on behalf of the Government of Seychelles**
 - * **To ensure the provision of utility services for the aforesaid rental flats and houses**
-

a) Findings

The PMC keeps most of its information in hard copies and the majority of information being requested relates to copies of agreements. From the samples of documents tested, a few requests were missing and handled outside of the timeframe specified by the Act.

During the audit, good practices has also been observed:

1. *The Information Officer receives support from the management and other staff members, and is proactively disclosing information to members of the public on a daily basis.*

b) Recommendations

- *Digitalising all records to prevent loss of information and fungus infestation.*
- *Missing records should be updated as soon as reasonably possible.*

Special Notes:

1. *The Agriculture Department failed to provide the Commission with any records after various attempts to obtain the documents.*
2. *The majority of issues raised in the audit findings and notified to the responsible personnel throughout the audit cycle to the best of our knowledge were not dealt with fully during the course of the audit.*

CONCLUSION

The compliance audit report for the year 2023 highlighted many challenges that Information Officers need to overcome in order to provide better service delivery in the public sector.

After each audit was completed, a summarized report of findings and recommendations was provided to each audited organization. It is to be noted that the same overall weaknesses were consistently observed throughout whereby public bodies lacked robust records management systems and practices in place for both electronic and physical copies, from source up to disposal. Fungus infestation seems to be a challenge that many organisations are facing.

The audit also observed a misunderstanding in recognizing what requests should be captured; either verbal requests received or a request coming from a law enforcement agency. Increased effort is needed to overcome this challenge, which could take the form of sensitization of staff by the IO's themselves or the HOIH's.

Information requests not being attended to is a recurring practice across various MDA's which could have been a clear oversight or a plain deemed refusal. Public bodies should ensure that there are sufficient processes and procedures in place to ensure that information requests being received is dealt with in an effective and timely manner and that all accompanying source documentations are maintained. These should also be communicated to all staff to ensure they are equally equipped and informed on the necessity of complying and the risks of non-compliance.

The Information Commission hopes that the audit process, interactions, and insights of the report has offered the organizations with added awareness of their critical weaknesses and compliance responsibilities to the ATIA, lowered their risks to fines or penalties, and strengthened an enabling environment to facilitate broader public service delivery.

We would like to express our sincere thanks for the assistance rendered by all to the Information Commission during the course of the audit.

Annex

Summary Of Audit Performed For The Year 2023

	Audit started	Entry Meeting	Findings	Information provided/ outstanding	Assurance Rating provided
National Sports Council	26.04.23	29.05.23	24.08.23	Outstanding	11.09.23
Seychelles Licensing Authority	25.04.23	09.05.23	28.08.23	Outstanding	14.09.23
Seychelles National Youth Council	17.04.23	10.05.23	11.08.23	Outstanding	06.09.23
Agency for Social Protection	11.04.23	24.04.23	11.08.23	Provided	21.09.23
Central Bank of Seychelles	17.04.23	03.05.23	25.08.23	Provided	11.09.23
Development Bank of Seychelles	17.04.23	10.05.23	11.08.23	Provided	15.09.23
Fair Trading Commission	14.04.23	23.05.23	24.08.23	Provided	13.09.23
National Assembly	11.04.23	17.04.23	17.08.23	Outstanding	06.09.23
Agriculture Department	17.04.23	16.05.23	04.09.23	Outstanding	11.09.23
Seychelles Commercial Bank	26.04.23	10.05.23	11.08.23	Outstanding	08.09.23
Seychelles Fishing Authority	26.04.23	23.05.23	23.08.23	Outstanding	07.09.23
Seychelles Revenue Commission	18.04.23	03.05.23	11.08.23	Provided	06.09.23
National Tender Board	27.04.23	08.05.23	17.08.23	Provided	06.09.23
Housing Finance Company	26.04.23	10.05.23	13.09.23	Provided	15.09.23
Judiciary of Seychelles	11.04.23	20.04.23	04.09.23	Provided	11.09.23
Industrial Estate Authority	05.05.23	18.05.23	11.08.23	Outstanding	06.09.23
Seychelles Canoe Association	18.04.23	27.04.23	04.09.23	Outstanding	11.09.23
Department of Environment & Climate Change	17.04.23	22.05.23	29.08.23	Outstanding	14.09.23
Property Management Corporation	17.04.23	25.04.23	23.08.23	Provided	07.09.23