

**7th MEETING OF THE
COMMISSION FOR STANDARDS IN PUBLIC LIFE FOR 2025
25 NOVEMBER 2025 @ 1:00 PM
MINUTES
VIA ZOOM**

PRESENT: Woody Foster Chairman
Keith Blake Member (via Zoom)
Diana Deopersad Member
Tonica Williams Member (via Zoom)

APOLOGIES: Jay Ehrhart Member

GUEST: Sue Winspear Consultant (via Zoom)

COMMISSIONS SECRETARIAT MEMBERS PRESENT:
Melanie McField Manager
Lise Hurlstone Research Analyst

1. Meeting called to order

The meeting was called to order at 1:02 pm. The Chairman welcomed all members and guest, Ms Sue Winspear, who continues to act as a consultant to the Commission.

2. Minutes from Previous Meeting

a. Meeting held on 16 October 2025

Members reviewed the minutes of the meeting held on 16 October 2025 and they were approved with no changes. The Secretariat will upload to the CSPL website.

3. New Business

a. CSPL ENQ 001/2025

The Secretariat provided a brief summary of this enquiry, which was received in early October 2025, along with submissions from relevant persons in early November 2025. As the enquiry was only cc'd to the CSPL (along with several other public authorities), and the issue was progressing through the normal internal complaint procedure for the entity concerned, members agreed that no further action was necessary at this time.

Relating to the administrative processing of complaints and enquiries, the Chairman requested that the Secretariat begin tracking the number of complaints and enquiries submitted, handled and disposed of, so that these statistics may be included in the

Commission's biannual reports.

4. Matters Arising from Previous Minutes

a. Legislative Amendments – SPLA

The CSPL Consultant, Ms Winspear, delivered a presentation on proposed legislative amendments based on her research and discussions with stakeholders over the last several weeks. This was discussed amongst members and it was agreed that Ms Winspear will amalgamate all feedback into a formal report for members review at the next meeting, prior to consultation and the Commission then agreeing on the final instructions to be sent to the Legal Drafting Department.

During this discussion the matter of establishing a Memorandum of Understanding (MOU) with the Ombudsman was raised. The Commission subsequently asked Ms Winspear to develop a draft MOU between the CSPL and the Ombudsman for their consideration.

b. Update: Parliamentary Code of Conduct

Ms Winspear reported that in her conversations with the Speaker he conveyed satisfaction with the overall status of the Parliamentary Code. He did request assistance with developing sanctions and penalties for inclusion, and indicated he is willing for these to be adopted from the Standards in Public Life Act (SPLA) and inserted into the Parliamentary Code.

He further noted that he does not consider it appropriate for investigations to be conducted from within Parliament; he supports CSPL being designated the role of appointing investigators. Progress on the Parliamentary Code is therefore contingent on CSPL amending its legislation to include the role of appointing investigators to examine breaches of the Code, and finalising proposed sanctions. Ms Winspear will research and propose sanctions for Members' review at the next meeting. Members agreed that these should also be included as a part of the anticipated consultation exercise for the legislative amendments.

c. Election Reform

The Commission was updated that the Chairman, along with Members Tonicia Williams and Diana Deopersad, and Secretariat staff, met with the Supervisor of Elections, Mr Wes Howell, on 20 October 2025. Mr Howell advised that a draft cabinet paper had been submitted with proposals for legislative amendments for comprehensive election reform, based on the results of the Election Observer Reports as well as feedback from stakeholders such as the CSPL, the Human Rights Commission, the Ombudsman, and the Attorney General's Chambers.

After the meeting Mr Howell provided a copy of the cabinet paper and appendices, which

were reviewed and analysed by Members Williams and Deopersad. Based on this analysis the Secretariat provided a draft response to Mr Howell. Members considered changes to the letter, including suggestions submitted via email by Member Jay Ehrhart. The Secretariat was asked to incorporate the requested changes and send to Mr Howell.

d. Draft MOU with Office of the Auditor General

Ms Winspear updated the Commission on her discussions with the Office of the Auditor General (OAG) on the proposed MOU. It was noted that discussions resolved that an information-sharing protocol between the OAG and CSPL may be more appropriate in this situation, and that the conversation is ongoing.

Ms Winspear added that it was proposed to the OAG that they begin including a statement in the annual audit engagement letters advising entities that any information provided during the audit may be shared by the OAG with the CSPL or the Anti-Corruption Commission as necessary, in order to address any data protection concerns OAG have with sharing information. Ms Winspear will continue to update the Commission once a formal response is received from the Auditor General.

e. Register of Interests Update

i. Update on compliance follow-ups

The Secretariat noted that the updated list of remaining outstanding high-priority declarants was shared with the Chairman, and he will continue progressing follow-ups with these persons, as agreed previously.

Ms Winspear updated Members that she continues cross-checking the content of declarations submitted in the 2024-2025 declaration period using other public-sector data sources, such as General Registry databases. She will report back on her findings to the Commission in due course.

ii. Declaration Guidance Notes

Ms Winspear noted that her review of the guidance notes will take place after there was agreement on the changes to the SPL legislation and regulations, as changes to the forms will impact the guidance notes.

iii. Civil Debt Recovery Procedure

Members reviewed the draft escalation procedure for non-compliant ROI declarants provided by the Secretariat. Members gave feedback and the Secretariat was asked to make the amendments accordingly and recirculate for approval.

f. Complaints/Enquiries

i. CSPL COMP 001/2023

Members were updated that a response from the Commission had been sent to the relevant third-party public authority, with a response requested by 5 December 2025. The Secretariat will continue to follow up as scheduled in the correspondence escalation procedure, as needed.

ii. CSPL COMP 001/2025

Members reviewed the reply from the public authority involved and noted that it does appear that an internal investigation is being conducted on the matter complained about. Members discussed and agreed to ask for a copy of the internal audit service report and any recommendations. Additionally, they agreed to ask to see a proposed implementation plan for the recommendations, once this is available. The Secretariat will prepare correspondence accordingly.

g. Draft 28th Report

The Secretariat noted that this draft report is in progress and continues to be worked on, with an aim to have a full draft available for members to review at the next meeting.

h. Post-Election Seminar Presentation

The Chairman provided an update following the Post-Election Seminar Presentation to Parliament and the visiting Commonwealth Parliamentary Association delegates held on 22 October 2025. Member Keith Blake was able to attend in-person to observe the presentation, along with the Secretariat. Overall the presentation was deemed to be successful, and a good discussion followed, the notes of which were provided by the Secretariat to all members. The Chairman also reported constructive discussions, including with a Member of Parliament from Guernsey and with Victoria Bower of CPA, who offered to share information on software for managing the Register of Interests. The Secretariat will follow up on this.

i. Policies & Procedures Update

i. Complaints Procedure

The Chairman noted he had a chance to review the amended Complaints Procedure wording to include anonymous complaints, and discussed the logistics of how anonymous complaints would be handled. It was agreed that it may be helpful to have feedback from the public on this issue, and so the topic of accepting anonymous complaints would be included as a discussion item in the Governance Campaign planned for 2026. In the meantime, the updated wording on the Complaint form wording was been approved.

j. Plan Cayman Tribunal

The Secretariat updated members on the letter written to the Chairperson of the PlanCayman Tribunal (PCT) requesting all members submit declarations to the Register of Interests, and her response. The Commission agreed that the Secretariat should follow

up with Chairman of PCT to see whether any assistance is needed for the remaining members to submit their declarations.

k. Regulation of Board Appointment Procedures

Members reviewed and discussed correspondence received from the Deputy Governor on the current board appointment procedures. It was agreed that Ms Winspear will propose possible amendments to the Public Authorities Act to standardise the process. Members agreed new public-sector board appointees should receive general, standardised governance training. The Research Analyst will confirm whether training is available via Zoom and revert to the Commission.

l. PR & Education Initiatives

The Secretariat Manager provided a proposal and timeline for a Governance Campaign to Members. The purpose of the Campaign is to engage the public and solicit feedback on a variety of Commission initiatives. Feedback was provided and the Manager agreed to incorporate comments into the plan. It was agreed that the Secretariat could progress the plan to the next steps.

5. Any Other Business

a. Media/Press Trawl

The Research Analyst noted that a Google Alert had successfully been set up to identify news stories relevant to the CSPL's remit, and that this feed will continue to be monitored.

6. Action Items

The Chairman will:

- a. continue progressing follow-ups with non-compliant, high-priority Persons in Public Life, as outlined in item 4.e.i. above.

The Consultant will:

- a. amalgamate all feedback on the legislative amendments into a formal report, as outlined in item 4.a. above;
- b. develop an MOU with the Ombudsman for the Commission's consideration, as outlined in item 4.a. above;
- c. research and propose sanctions for the Parliamentary Code, as outlined in item 4.b. above;
- d. continue to update the Commission once a formal response is received from the Auditor General; and
- e. report back on her findings from the declaration checks, as outlined in item 4.e.i. above.

The Secretariat will:

- a. upload to the CSPL website, as outlined in item 2.a. above;
- b. begin tracking the number of complaints and enquiries for biannual reports, as outlined

- in item 3.a. above;
- c. include review of Parliamentary Code of Conduct sanctions as a part of the anticipated consultation exercise for the legislative amendments, as outlined in item 4.b. above;
 - d. incorporate the requested amendments to the letter to the Supervisor of Elections and issue it accordingly, as outlined in item 4.c. above;
 - e. make the amendments to the escalation procedure for non-compliant ROI declarants and recirculate for approval, as outlined in item 4.e.iii;
 - f. continue to follow up as scheduled in the correspondence escalation procedure for CSPL COMP 001/2023, as outlined in item 4.f.i. above;
 - g. ask for a copy of the internal audit service report, recommendations and any proposed implementation plan for the recommendations, once available, as outlined in item 4.f.ii. above;
 - h. continue drafting the 28th Report for review at the next meeting, as outlined in item 4.g. above;
 - i. contact CPA representatives regarding software for managing the Register of Interests, as outlined in item 4.h. above;
 - j. include the topic of accepting anonymous complaints in the Governance Campaign planned for 2026, as outlined in item 4.i.i. above;
 - k. finalise the approved wording on the Complaint form wording regarding anonymous complaints, as outlined in item 4.i.i. above;
 - l. follow up with Chairman of PlanCayman Tribunal to see whether any assistance in submitting declarations is needed, as outlined in item 4.j. above;
 - m. confirm whether the Deputy Governor's governance training is available via Zoom and revert to the Commission, as outlined in item 4.k. above;
 - n. incorporate feedback on the Governance Campaign into the plan and proceed to the next steps, as outlined in item 4.l. above;
 - o. continue to monitor relevant news stories via Google Alert, as outlined in item 5.a. above; and
 - p. circulate proposed meeting dates for 2026 every 6 weeks starting from 20 January 2026, as outlined in item 8 below.

7. Items to be Discussed at the Next Meetings

- a. Legislative Amendments – SPLA
- b. PR & Education Initiatives
- c. Parliamentary Code of Conduct
- d. Election Reform
- e. Draft Information Sharing Protocol with Auditor General
- f. Register of Interests Update
- g. Complaints / Enquiries
- h. Draft 28th Report
- i. Policies & Procedures Update
- j. PlanCayman Tribunal

- k. Regulation of Board Appointment Procedures
- l. MOU with the Ombudsman

8. Next Meeting

The next meeting is scheduled for 20 January 2026 at 2:00 pm. The Secretariat was also asked to send out all meeting invites for 2026, every 6 weeks, adjusting for holidays as necessary.

9. Adjournment

The meeting adjourned at 4:10 pm.



Woodrow Foster
CHAIRPERSON
COMMISSION FOR STANDARDS IN PUBLIC LIFE