



**THE TWENTY-SECOND  
REPORT OF THE  
COMMISSION FOR  
STANDARDS IN PUBLIC  
LIFE**



FOR THE PERIOD OF

**1 AUGUST 2021 - 31 JANUARY 2022**

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## Section One

# INTRODUCTION

1. The Commission for Standards in Public Life (the “Commission”) was established as an institution supporting democracy under the Cayman Islands Constitution Order 2009 (the “Constitution”). Its introduction reinforced the need to have regard to ethics and transparency as important elements of a democratic society and the necessary protection of the rights and freedoms of the people in the Cayman Islands.
  2. With its mandate as set out in section 117(9) Cayman Islands Constitution Order 2009, the first Commission was appointed in January 2010. The first Commission was very ably chaired by Mrs. Karin Thompson, MBE, whose accomplishments, among other things, included the introduction of The Standards in Public Life Act, 2014 (the “SPL Act”).
  3. The first Commission’s 4-year term ended in January 2014. The outgoing Commission, however, kindly agreed to remain in the post until February 2014.
  4. The Commission is mandated under section 117(9)(g) of the Constitution to report to Parliament at regular intervals and at least every six months.
  5. The Reports of the first Commission, i.e. report numbers 1 through 8, detail the various tasks undertaken by the first Commission and its accomplishments in each respect. The Reports are available on the Commission’s website.
  6. Previous Chairman Rosie Whittaker-Myles and Former Member Sheenah Hislop were appointed to the Commission on 1 February 2015 for a period of four years. At the request of His Excellency the Governor both agreed repeatedly to extend their tenures until 28 February 2021. Member Isatou Smith was appointed, following the resignation of Pastor Shian O’Connor (to pursue educational advancements) on 1 November 2018 for a period of four years.
  7. On 1 May 2021, four new Commission Members were appointed to join previously appointed Member Isatou Smith. The new appointees were Chairman Dr. Sonia Bush and Members J.Rosalie Twohey, Richard Addlestone and Keith Blake.
  8. The Reports of the Commission headed by the previous Chairman, Rosie Whittaker-Myles i.e. report numbers 9 through 20, detail the various tasks undertaken by this Commission and its accomplishments in each respect. These Reports are also available on the Commission's website.
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9. In this Report, the Commission will outline the progress made and the key issues arising from the work completed by the Commission over the period 1 August 2021 - 31 January 2022.

10. During this reporting period the Members have:
- a. discussed proposed amendments to the SPL Act and Regulations; and
  - b. discussed proposed changes to the Commission's Code of Conduct;
  - c. spent time considering and handling matters related to the submissions of declarations by persons in public life.

## Section Two

# MEETINGS AND ADMINISTRATIVE MATTERS OF THE COMMISSION

11. The reporting period for this Report commenced on 1 August 2021 and the Commission held an extraordinary meeting on 16 August 2021 and a general meeting on 26 January 2022.

12. The Minutes of the Meetings of the Commission reflect the matters discussed and undertaken by the Commission. Once approved, copies of the Commission Meeting Minutes are available on the Commission's website.

13. The Commission's Twenty-first Report was under review during this period.

14. The Chairman and Secretariat met with H.E. the Governor Martyn Roper, OBE on 18 October 2021 to provide an update on the activities of the Commission.

## Section Three

# STANDARDS IN PUBLIC LIFE LEGISLATION (SPL)

### 15. Meeting with the Hon. Attorney General and Portfolio of Legal Affairs Representatives

The Chairman and a Member, met with the Hon. Attorney General, the Solicitor General, the Senior Legislative Counsel, the Secretariat Manager and the Secretariat Research Analyst on 26 October 2021 to discuss proposed amendments and queries concerning the SPL Act.

### 16. Amendments to the SPL Act and SPL Regs

On 12 November 2021, the Senior Legislative Counsel sent a written update to the proposed amendments, along with some queries and comments. The Commission discussed this latest document and agreed to draft a response to the Senior Legislative Counsel. It was also agreed that the

Commission would update the internal administrative procedures for the handling of the Register for review and further discussion by the Members.

## Section Four PROCUREMENT

17. The Commission did not consider any matters concerning procurement during this reporting session.

## Section Five REGISTER OF INTERESTS

18. The Commission continued to monitor declaration submissions and addressed queries as they arose during this reporting session.

## Section Six CODE OF CONDUCT AND RELATED MATTERS

**19. Ministerial Code of Conduct**  
The Commission did not consider any matters concerning the ministerial code of conduct during this reporting session.

## 20. CSPL Code of Conduct

Commission Members discussed the changes made to the Code of Conduct document at the meeting on 15 July 2021. It was agreed that Section j. on Remedies could be rephrased slightly. The Secretariat was asked to prepare a draft for review and approval.

## Section Seven CONFLICTS OF INTEREST

21. The Commission did not consider any matters concerning conflicts of interest during this reporting session.

## Section Eight EDUCATION AND PUBLIC RELATIONS

22. The Commission did not undertake any education or public relation endeavours during this reporting session.

## Section Nine COMPLAINTS

23. During this reporting period one complaints was submitted to the Commission, members agreed for it to be raised at the next meeting.

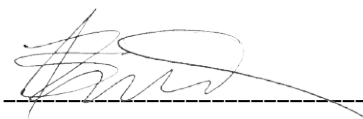
## Section Ten

# MOVING FORWARD

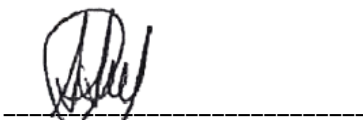
28. Over the next reporting period the Commission will continue to:
- a. finalise the draft SPL (Amendment) Bill, and Regulations;
  - b. facilitate any requests for viewing the Register of Interests;
  - c. monitor and handle matters related to the submission of declarations by persons in public life;
  - d. consider feedback on the new RoI online portal;
  - e. address any complaints received;
  - f. support the finalization of the Ministerial Code of Conduct and the development of a Parliamentary Code of Conduct; and
  - g. participate in any educational or public relations opportunities, as well as in local and regional cooperation efforts where possible.

For more information on the Commission for Standards in Public Life please visit [www.standardsinpubliclifecommission.ky](http://www.standardsinpubliclifecommission.ky), e-mail [info@standardsinpubliclifecommission.ky](mailto:info@standardsinpubliclifecommission.ky), connect with us <https://www.linkedin.com/company/commission-for-standards-in-public-life> or call 244-3685.

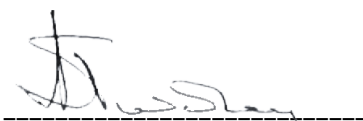
Dated this day 24 of October 2022.



Dr. Sonia Bush



Isatou Smith



J. Rosalie Twohey



Richard Addlestone



Keith Blake

Section Eleven

# APPENDIX

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# MEMBER BIOGRAPHIES

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## Dr. Sonia Bush (Chairman)

**Dr. Sonia Bush** is an Attorney at Law in the Cayman Islands as the owner and sole practitioner of Sonia Bush and Associates Law. Sonia obtained a LLB (Hons) degree from the University of Liverpool, and she was trained by one of Cayman's top law firms. Additionally, **Dr. Bush** obtained a Bachelor's of Science Degree in International Finance, (BSc.), a Master of Business Administration Degree (MBA), a Master of Science Degree (MSc.), and a PhD in Management with a minor in Leadership. She also is a registered member of the Society of Trust and Estate Practitioners, and a designated Trust and Estate Practitioner ("TEP") since 2001.

**Dr. Bush** was called to the Cayman Islands Bar in July 2009, and broadened her exposure to offshore trusts, while working as an attorney at law in Jersey, Channel Islands. Her areas of practice include Trust and Estate Planning, Business Formation, Company Incorporation, Intellectual Property including registration of Trademarks, Work Permits, Family Law, Residency, Guardianship, Wills, Probate and Administration and Real Estate. **Dr. Bush** is also a Notary Public and provides this service from the Firm's office. In addition to practicing law, **Dr. Bush** has worked over ten years in the financial industry in the Cayman Islands, in particular at offshore trust and banks as a Trust Account Manager.

**Dr. Bush** was appointed as Chairman effective 1 May 2021 for a four year term.



## Ms. Isatou Smith (Member)

As Managing Director, **Ms Smith** oversees the operations of EisnerAmper Governance Services Ltd. Additionally, **Ms. Smith** acts as director for investment funds including several sponsored by large global asset managers and performs certain compliance functions for investment entities. She has been active in the investment funds industry for over nineteen years and has significant regulatory and corporate governance experience with investment funds and their operations.



Prior to joining EisnerAmper Governance Services Ltd., **Ms. Smith** acted as an independent director through Lainston International Management (Cayman) Ltd. ("Lainston"). At Lainston **Ms. Smith** was responsible for business development, thought leadership publications and management of a portfolio of director and compliance clients. She was previously a Director at Intertrust Fund Services (Cayman) Limited (formerly Walkers Fund Services (Cayman) Limited ("Intertrust")) where she also provided director services to a wide range of investment fund structures with varying investment strategies across multiple jurisdictions.

Prior to joining Intertrust, **Ms. Smith** was employed by CIMA as a Senior Analyst with focus in the Investments and Securities Division. At CIMA she was instrumental in key regulatory developments and led a large team of Investments and Securities Analysts that were responsible for the on-going monitoring and regulation of investment funds, mutual fund administrators and securities investment business licensees.

**Ms. Smith** holds a Bachelor of Law equivalent and Professional Practice Certificate with distinction from the Cayman Islands Law School and a Graduate Diploma in Law from BPP University in London, England. She also has a Master of Business Administration degree with a specialization in Finance from Northeastern University in Boston, Massachusetts. **Ms. Smith** also received a Bachelor of Business Administration degree in International Business from James Madison University in Harrisonburg, Virginia. **Ms. Smith** is a professionally accredited director with the Institute of Chartered Secretaries Canada (ICSA) and is also a member of the Association of Certified Anti-Money Laundering Specialists (ACAMS) and of the Cayman Islands Directors Association (CIDA).

**Ms. Smith** was appointed effective 1 November 2018 for a four year term.



### **Mrs. J. Rosalie Twohey (Member)**

**J. Rosalie Twohey** recently took a hiatus from her post as Deputy Managing Director of Cainvest Bank and Trust Ltd in order to pursue a LLM from the University of Liverpool. **Mrs. Twohey** has also served as Head of Institutional and Accounting – Trust with the Bank of Butterfield, Financial Controller of Walkers Global Holdings Ltd and previously with Bank Austria Cayman Islands Ltd. In addition to her LLM, **Mrs. Twohey** possesses an MBA from the University of Liverpool and a BSc (Cum Laude) in Accounting from Howard University. **Mrs. Twohey** became a CPA in 1986.

**Mrs. Twohey** was appointed as a Member effective 1 May 2021 for a four year term.



### **Mr. Richard Addlestone (Member)**

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**Mr. Richard Addlestone** is Senior Counsel at Dart. He has almost thirty years of professional experience, the last eighteen of those being in Cayman working as a partner with Walkers, Appleby, and Bedell (formerly Solomon Harris). Whilst in private practice **Mr. Addlestone** focused primarily on private equity, investment funds, and transactional work with a secondary focus on banking and finance, as well as captive insurance and reinsurance. Prior to relocating to Cayman **Mr. Addlestone** practiced as an English solicitor at Paisner & Co (now Bryan Cave Leighton Paisner), LeBoeuf Lamb Greene & MacRae (subsequently, Dewey & LeBoeuf) and Denton Wilde Sapte (now Dentons).

**Mr. Addlestone** is a member of the Law Society of England and Wales, a past member of the executive of the Cayman branch of the Alternative Investment Management Association and a former member of the Financial Services Legislative Committee's Sub-Committee for the Companies Law. He was recently appointed to the Cayman Islands Attorneys Regulation Authority. During his professional career **Mr. Addlestone** was heavily involved in training Caymanian attorneys and educating Cayman school children about the legal world as part of a programme sponsored by the law firm he was working with, and with university students visiting from Elon University about how the Cayman Islands operates as an Offshore Financial Centre.

Throughout his time in the Cayman Islands he has participated in community charitable, cultural, and civic affairs ranging from financially supporting various bodies such as Red Cross, CCMI, the National Trust, the Queen Elizabeth II Botanic Park, the Cayman Islands Arts Festival, and others. He has played the violin with the Cayman Islands National Orchestra and other musical ensembles for charitable fundraising events, delivered meals for Meals on Wheels, and volunteered in lionfish culls in Little Cayman, and for the Sister Islands Rock Iguana Preservation Programme.

**Mr. Addlestone** was appointed as a Member effective 1 May 2021 for a four year term.



### **Mr. Keith Blake (Member)**

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**Mr. Keith Blake** is a Senior Director with Alvarez & Marsal, based in the Cayman Islands. He has more than 30 years of insolvency and restructuring experience, including the last 21 years working in the Cayman Islands. After leaving school, **Mr. Blake** spent 10 years at NatWest Bank in the U.K., with the last 18 months of that time working in the bank's Insolvency and Debt Recovery department in London. In 1990 **Mr. Blake** joined KPMG in London, spending nine years working on the liquidations of a number of banks, including several that had previously traded in the secondary market of Latin American sovereign-backed debt.

Drawing upon this experience, **Mr. Blake** moved to KPMG in the Cayman Islands in January 2000 to assist in liquidating the Cayman and British Virgin Islands (BVI) subsidiaries of one of the (at the time) largest Brazilian international banks. Staying in the Cayman Islands, **Mr. Blake** continued to work at KPMG taking many appointments as Joint Voluntary Liquidator of Cayman hedge funds and other entities. In addition, **Mr. Blake** played a significant role as one of the Joint Receivers of the underlying companies of a major Seven Mile Beach hotel and resort that went through a financial restructuring in 2012. More recently, **Mr. Blake** has been appointed by the Grand Court of the Cayman Islands as an Interim Administrator over a deceased person's estate. He has also acted as a Controller appointed by Cayman Islands Monetary Authority (CIMA) under the Cayman Islands Mutual Funds Law. **Mr. Blake** is a Notary Public.

**Mr. Blake** was appointed as a Member effective 1 May 2021 for a four year term.



## Commission for Standards in Public Life (CSPL)

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## CSPL - Register of Interests

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