

Anti-Bribery and Corruption Strategy 2022 – 2027



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Anti-Bribery and Corruption Strategy Consultation

4 March – 19 April 2022

Summary of Responses Received and Action Taken

We Asked

The Cabinet Office sought input and feedback in relation to the Draft Isle of Man Anti-Bribery and Corruption Strategy via the Consultation Hub platform between 4 March and 19 April.

The Anti-Bribery and Corruption Strategy sets out a framework for the Isle of Man's response to the threats posed by bribery and corruption.

The Strategy sets out a Vision for the Island as a jurisdiction that protects people from bribery and corruption and where everyone understands their role in recognising and preventing the threats and harms arising from these offences. The Vision is expressed through three statements.

In the Isle of Man:

1. We all recognise and identify bribery and corruption when we see it;
2. We have clear, confidential and accessible reporting channels for suspicions of bribery and corruption;
3. We utilise a robust response to bribery and corruption that is coordinated and underpinned by best practice.

The purpose of this consultation was to gather views and feedback to ensure that the Strategy delivers a robust, coordinated and Island-wide response.

This document details the feedback received from the Consultation Hub¹. Both quantitative and qualitative input were sought. Quantitative data received has been expressed as graphs. Qualitative feedback has been reproduced anonymously², where respondents have provided consent for this to be done, alongside a response outlining how and if it has been incorporated into the Strategy document.

You Said and We Did

We received 48 responses through the Consultation Hub and 4 from other sources.

¹ The Consultation Hub specifically asked respondents for permission to publish their responses anonymously. Respondents who sent in comments through other routes were not explicitly asked for permission for their responses to be published. While they have all been considered, therefore, they have not been included in this summary document.

² Where respondents have referred to other third parties by name, names have been redacted.

Most respondents submitted responses as individuals. The graph on Page 2 relates to the 48 responses received through the Consultation Hub and illustrate the percentage of respondents from the private and public sector, and those not working at the moment.

Section One – Statement and Vision

On the whole, respondents found this section clear and easy to understand. Some feedback suggested ways to provide further clarity, both in terms of language and layout and where possible these have been taken on board. A graphic was added to further illustrate the relationship between the Mission Statement, Vision Statements and Strategic Outcomes.

Section Two – Defining the Issue

Again, the majority of respondents who participated via the Consultation Hub found the definitions of bribery and corruption, and how they are linked, clear and easy to understand. Respondents made further suggestions in this Section as to how definitions could be clarified and layout improved. These suggestions have also been considered and incorporated where possible.

Section Three – Addressing Bribery and Corruption

Respondents were more divided on the question of whether the Strategy made it clear how to recognise and respond to bribery and corruption, with an almost equal split in response numbers between 'Yes' (23) and 'Somewhat' (22). Qualitative feedback called for greater specificity in relation to how bribery and corruption should be reported and how it will be addressed. This feedback was taken on board and the Section renamed to 'The Isle of Man Context' and further advice and guidance on reporting pathways added. The graphic illustrating how the Agencies work together has been redesigned and enlarged to improve legibility.

Section Four – Strategic Objectives and Actions

This part of the Consultation asked respondents to rank on a scale of 1 – 5 (with 1 being the least and 5 being the most) how each of the Strategic Objectives will help the Island to achieve its aims of 'Protecting People from Bribery and Corruption'.

The majority of respondents scored 4 for all Strategic Objectives.

Throughout this section, a number of responses questioned whether and how the Strategic Objectives and Actions would be delivered. Where these responses noted specific Actions, these have been considered for inclusion in an Implementation Plan, to be published once the Strategy has been improved.

Strategic Objective One - 'Address the risks to the Isle of Man, identified in the National Risk Assessment 2020, in respect of Bribery and Corruption'

Some feedback was received suggesting that the relationship between bribery, corruption and other policies, processes and offences could be better articulated. These suggestions have been considered and, where processes involve other areas, sent on for information.

Strategic Objective Two – 'Reduce vulnerabilities to bribery and corruption in the public sector'

Qualitative responses focussed on the need for increased training and information for the public sector, as well as suggested policy and process changes. These suggestions have been considered and, where processes involve other areas, sent on for information.

Strategic Objective Three - 'Demonstrate that the Isle of Man has a coherent approach to combatting both domestic and international bribery and corruption'

Qualitative responses were generally suggestions for amendments and additions to clarify meaning. Some responses also touched on a greater need for training and awareness. These have been considered and the Strategy amended to include them where possible.

The description of the Strategic Objective has been amended to 'Deliver a coherent approach to combatting both domestic and international bribery and corruption'.

Strategic Objective Four – 'Improve detection, reporting and enforcement in respect of both domestic and international bribery and corruption'

Qualitative responses were generally suggestions regarding introduction of legislation, policy and the how certain processes can be strengthened. These have been considered and the Strategy amended to include them where possible.

Strategic Objective Five – 'Deliver a long-term and sustainable model for addressing the ongoing risk to the Island from international and domestic bribery and corruption'

Qualitative responses were primarily focused on a need for further clarity as to how the Strategy and its Actions would be implemented and monitored and how different Agencies will work together. These comments have been taken on board and the Strategy updated to clarify.

Section Five – Beyond the Strategy

This Section was felt by respondents to be less clear, with an equal split of quantitative responses between 'Yes' and 'Somewhat'.

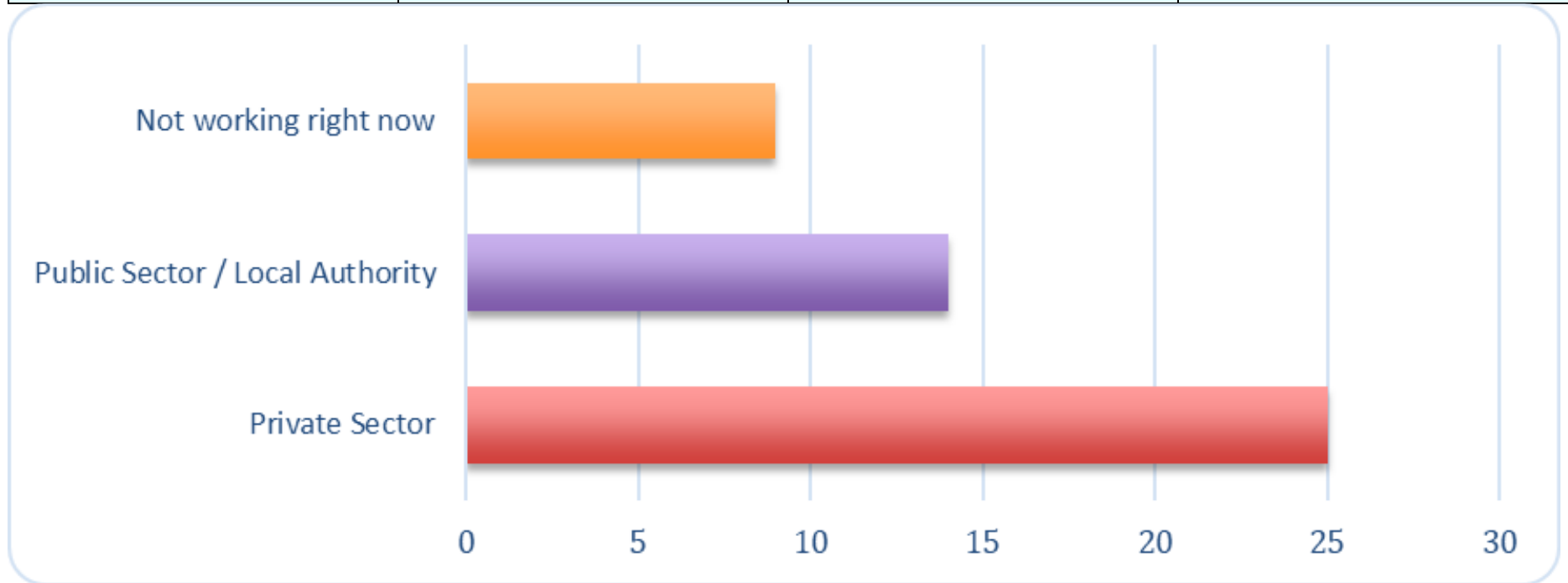
Qualitative responses expressed a similar lack of clarity. These comments have been taken on board and an Implementation Plan will be published once the Strategy has been approved, with measurable actions and outcomes.

Overall Comments

Respondents were split between those who are generally supportive of the Strategy and its aims and those perhaps more sceptical about its success. Reflected in both sets of comments is the need for clear and measurable actions and for training and guidance for all sectors. These responses have been taken into account and will be reflected in an Implementation Plan which will be published after the Strategy has been approved.

About You

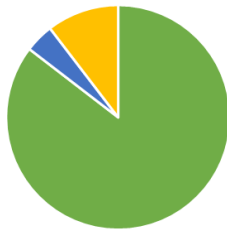
Private Sector Responses	Public Sector Responses	Full Time Education Responses	Not working Responses
25	14	0	9



Statement and Vision

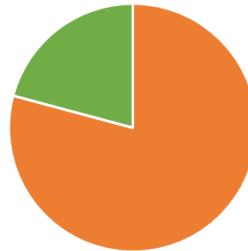
Does the Strategy clearly explain the need to act against bribery and corruption?		Are the Vision and Mission Statement clear and easy to understand?		Does the Strategy explain clearly how the different agencies work together to respond to bribery and corruption?	
Yes	41	Yes	38	Yes	33
No	2	No	0	No	4
Somewhat	5	Somewhat	10	Somewhat	11

Does the Strategy clearly explain the need to act against bribery and corruption?



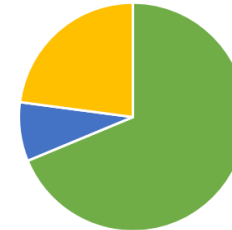
■ Yes ■ No ■ Somewhat

Are the Vision and Mission Statement clear and easy to understand?



■ Yes ■ No ■ Somewhat

Does the Strategy explain clearly how the different agencies work together to respond to bribery and corruption?



■ Yes ■ No ■ Somewhat

Do you have any comments in relation to the Statement & Vision?	You Said We Did
Government need to look closer to home. Bribery and corruption on the island is rife - - planning is a prime example. The Eastern Area plan in particular	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
I found it slightly opaque as usual.	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
The Strategy and Vision states agencies will work together but not how	Your comment is noted and the Strategy updated to more clearly explain how the Agencies work together.
<p>I have qualifications in the law, I have found the courts do not use the "'law', more so it is the administrators of the law is where the corruptions are in my 48 years of being abused by the Establishment closing ranks from the CM to the Solicitor General to the AG's acting or otherwise. The police are there to protect above compounding the crimes against the nation and God's children.</p> <p>The evil in our corrupt system of government is beyond blatant, it is open, high handed and outrageous, the law society is full of decaying rotten apples and child abusers, the MHK's are failing in their duty to check and balance the corrupt child abusing executive and judiciary that protects it, the civil service is not fit for service only fit for Jurby as it has turned 'Gangster' on we the people. The Government is run by impropriety and is unconstitutional by its own corruptions. So start at the top and in the public sector before expanding outwards to the private sector but clean 'in-house' first its stench from the evil it generates on a daily basis has turned it Luciferian!!</p>	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
The Statement and Vision could be formatted in bullet points to make it more "readable" and have greater impact with the public	This suggestion has been noted and a graphic added to illustrate the Statement and Vision more clearly.

No	Noted. No action required.
<p>Our Vision "The Vision for the Isle of Man as a jurisdiction that protects people from bribery and corruption." Are we a jurisdiction that 'protects people'?</p> <p>More consistent with the preamble would surely be "A jurisdiction that protects our people, our government and our businesses from the impact of bribery and corruption at home and abroad".</p>	This comment is noted and the Strategy updated as suggested.
None	Noted. No action required.
Not clear how the IOM will protect people who are 'further afield'. This is an ambitious mission - what checks and procedures will really be in place beyond the IOM?	This comment is noted and the Strategy updated to clarify that protecting people further afield will be through ensuring that our financial system and international businesses operate lawfully and ethically.
Key to delivery of the strategy will be ensuring that the different agencies do work together as envisaged	Noted. Consideration will need to be given as to how to support Agencies to work together as envisaged.
No.	Noted. No action required.
Recognition that the risk of bribery and corruption faced by the Island, and the need for concerted action is very much welcomed. Excellent initiative in my view. It is questioned, however, why fraud is not referred to by the same token?	Noted. While no specific action for the Anti-Bribery and Corruption Strategy is suggested, the point regarding Fraud is acknowledged. A table has been added in Section Two that identifies Fraud as a type of corruption.
A useful section that outlines the vulnerabilities of the Isle of Man as an international and business centre and the need to act against bribery and corruption.	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
For consistency, you might want to consider changing the wording of objective 5 to refer to "domestic and international Bribery and Corruption" to align with objectives 3 and 4. The word 'investigation' in the final paragraph on page 8 should read as 'investigate'.	This suggestion is noted and the Strategy has been updated accordingly.

<p>It is concise and clear</p>	<p>Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.</p>
<p>The whole document is very verbose and repetitive. There is a mish-mash between statement / vision / strategy.</p> <p>Better to State the problem - including implications</p> <p>State where we want to be</p> <p>State how to get there - what is being done now - what more needs to be done</p> <p>In about three pages.</p> <p>The most important point is lost in a bullet on page 17 - providing an independent reporting line for corruption to be reported.</p> <p>This should be done at an island level - and at individual organisations. This is what "tone at the top" means. Everyone needs to know that management and government will walk away from an otherwise attractive proposition if it is unethical.</p>	<p>Feedback is acknowledged.</p> <p>A graphic has been added to illustrate the relationship between the Mission Statement, Vision and Strategic Objectives.</p> <p>An Executive Summary provides a precis overview of the need to act and how the Isle of Man will respond.</p> <p>The feedback regarding a confidential reporting line is acknowledged. Confidential reporting is one element of a coherent response and the Strategy makes the commitment to ensure this can be done safely and conveniently for anyone in the Isle of Man.</p> <p>The comment regarding 'tone at the top' is noted and the Strategy commits to providing guidance to both the private and public sector on how to effectively address bribery and corruption in their respective organisations.</p>
<p>The strategy renders itself oblivious to the most prevalent form of bribery and corruption on the Isle of Man by focussing on bribery toward individuals to the exclusion of examining institutional bribery and corruption.</p> <p>Bribery occurs en masse in the Isle of Man and other offshore jurisdictions, which most individuals concerned don't even realise. It isn't one public servant receiving £50,000 to turn a blind eye to criminality but more like 5,000 individuals benefitting directly from an</p>	<p>This feedback and information is acknowledged. The Strategy has been updated to include reference to the misuse of lawful means to achieve corrupt ends and strengthen language on the laundering of the proceeds of corruption and kleptocracy.</p>

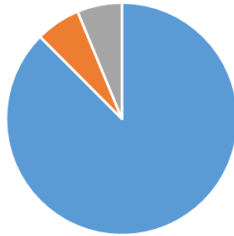
<p>inherently criminal billion-pound industry, and the rest of the Isle of Man benefiting indirectly. These individuals receive a generous salary for their ability and effort; they receive a prestigious role, belonging, purpose, and safety in numbers. They don't even need to be aware of the nefarious business they facilitate as long as they can avoid looking at the bigger picture and joining the dots; when one is within this obfuscated system, one doesn't see the wood for the trees and were individuals to realise it and their role within it they'd struggle live with the horrible truth of it.</p> <p>Catherine Belton's critically acclaimed book Putin's people sets out Russian's strategy for corrupting Western democracies, through the wealth the state has passed to Russian oligarchs who in turn act as KGB pawns.</p> <p>If the IoM strategy doesn't address how Russia (which passes a lot of money through the IoM) might be corrupted by Russian money, then the IoM's Bribery and Corruption strategy is nothing more than an empty PR exercise. Consider the fact that the top regulatory, and judicial roles are populated by individuals who have benefitted from laundering Russian money. Consider the fact that Bridgewater's was allowed to operate so long under the effective control of [redacted] whose fraud during the Scottish Power scandal should have ruled him out of his key officer role. Consider the lack of independence within and between the Manx Justice system and the financial sector, which effectively demotes the rule of law below the rule of patronage, and in doing so makes the island extremely susceptible to the corruption of a self-serving cabal. Consider Corruption and Bribery on a cultural and institutional level. I am party to a case in which it appears that Manx authorities deliberately allow the IoM's largest financial service provider to maintain a read and write backdoor to their systems, which is readily exploitable to tech-savvy regimes like Russia.</p>	
<p>Government employees need to be first to understand it! Most corporations have robust policy and processes in place to ensure their staff understand</p>	<p>This feedback is noted. Training for public sector employees is included as an action under the Strategic Objectives.</p>

No additional comments	Noted. No action required.
Page 9 - (figure 1) - too small to read	Thank you for your feedback. The graphic has been re-designed to improve legibility.

Defining the Issue

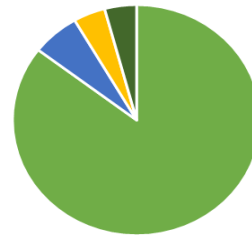
Is the definition of bribery provided in the Strategy clear and easy to understand?		Is the definition of corruption provided in the Strategy clear and easy to understand?		Does the Strategy make it clear how bribery and corruption are linked?	
Yes	42	Yes	41	Yes	40
No	3	No	3	No	2
Somewhat	3	Somewhat	2	Somewhat	6
		Not Answered	2		

Is the definition of bribery provided in the Strategy clear and easy to understand?



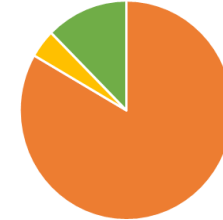
■ Yes ■ No ■ Somewhat

Is the definition of corruption provided in the Strategy clear and easy to understand?



■ Yes ■ No ■ Somewhat ■ Not Answered

Does the Strategy make it clear how bribery and corruption are linked?



■ Yes ■ No ■ Somewhat

Do you have any comments in relation to 'Defining the Issue'?	You Said We Did
Corruption seem to make people think of financial gain, the issue on the Isle of Man isn't really financial corruption but turning a blind eye or pushing a friends/family's agenda. Obviously bribery is financial	The comment is noted and the Strategy amended as suggested.
As is normal with any IOM Gov Strategy docs this "defining the issue" needs a clearer rethink.	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
Does this also include bullying in Charities?	The Strategy will not specifically address bullying in charities. However, your query has been acknowledged and will be raised with the agencies who have overall responsibilities for Isle of Man Charities, for their awareness.
Where is the definition ? do you mean the 3 'vision' statements?!!! It does not explain anything to do with B&C!	A sub-heading 'What are bribery and corruption' has been added to the Section to provide more clarity. Examples of corruption have also been added.
No	Noted. No action required.
<p>Where one of the purposes of this document is to be 'accessible' to all, you might; further simplify the definition of bribery (based on the Uk definition). "giving or promising someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so"</p> <p>Definition of Corruption is clear and contains all key terms consistent with internationally accepted definitions.</p> <p>Link between bribery and corruption is not particularly clear. Further confused by this statement "Corruption includes bribery and is linked</p>	The comment is noted and the Strategy has been updated with the suggested definition.

<p>to other offences such as tax evasion, fraud, embezzlement and extortion or intimidation and can facilitate crimes such as money laundering, the financing of terrorism, environmental crimes and drugs or people trafficking". Review of OECD paper referenced did not add further clarity.</p> <p>Definitions of bribery and corruption often fall foul of balancing accessibility and understanding of the problem in documents such as this, with the other important part of the gov strategy, criminal / civil enforcement action. Whats the purpose of these definitions; education and awareness or will we see the key terms reflected in legislative change?</p>	<p>Further to this feedback, the link between bribery, corruption and other financial crimes has been clarified through the addition of a table and further explanation.</p>
<p>none</p>	<p>Noted. No Action Required.</p>
<p>Perhaps this section could come first to define the issue before the statement/vision on how to tackle it?</p>	<p>The feedback is noted and the layout of the Strategy rearranged as suggested.</p>
<p>No.</p>	<p>Noted. No Action Required.</p>
<p>Again, why is the risk of fraud not within the scope of this strategy?</p>	<p>The comment regarding Fraud is noted. A table has been added that identifies Fraud as a type of corruption.</p>
<p>The section rightly identifies the threat from those seeking to launder the proceeds of bribery and corruption through the Isle of Man as well as the high risks associated with some other jurisdictions and activities. Reputational risk is not mentioned but is hugely important.</p>	<p>This feedback is noted and Reputational Risk has been added to Section Three, as suggested.</p>
<p>None.</p>	<p>Noted. No Action Required.</p>
<p>The fact that one has to plough through to page 11 to find it!</p>	<p>The feedback is acknowledged and the layout of the Strategy rearranged to make this appear earlier in the document.</p>
<p>The strategy renders itself oblivious to the most prevalent form of bribery and corruption on the Isle of Man by focussing on bribery toward individuals to the exclusion of examining institutional bribery and corruption.</p> <p>Bribery occurs en masse in the Isle of Man and other offshore jurisdictions, which most individuals concerned don't even realise. It isn't one public servant receiving £50,000 to turn a blind eye to</p>	<p>This comment is a duplicate of one already received.</p>

criminality but more like 5,000 individuals benefitting directly from an inherently criminal billion-pound industry, and the rest of the Isle of Man benefitting indirectly. These individuals receive a generous salary for their ability and effort; they receive a prestigious role, belonging, purpose, and safety in numbers. They don't even need to be aware of the nefarious business they facilitate as long as they can avoid looking at the bigger picture and joining the dots; when one is within this obfuscated system, one doesn't see the wood for the trees and were individuals to realise it and their role within it they'd struggle live with the horrible truth of it.

Catherine Belton's critically acclaimed book Putin's people sets out Russian's strategy for corrupting Western democracies, through the wealth the state has passed to Russian oligarchs who in turn act as KGB pawns.

If the IoM strategy doesn't address how Russia (which passes a lot of money through the IoM) might be corrupted by Russian money, then the IoM's Bribery and Corruption strategy is nothing more than an empty PR exercise. Consider the fact that the top regulatory, and judicial roles are populated by individuals who have benefitted from laundering Russian money. Consider the fact that Bridgewater's was allowed to operate so long under the effective control of [redacted] whose fraud during the Scottish Power scandal should have ruled him out of his key officer role. Consider the lack of independence within and between the Manx Justice system and the financial sector, which effectively demotes the rule of law below the rule of patronage, and in doing so makes the island extremely susceptible to the corruption of a self-serving cabal. Consider Corruption and Bribery on a cultural and institutional level. I am party to a case in which it appears that Manx authorities deliberately allow the IoM's largest financial service provider to maintain a read and write backdoor to their systems, which is readily exploitable to tech-savvy regimes like Russia.

Defining the issue again needs made clear to civil servants. Comments like ` I am getting free legal advice' from a senior civil servant is questionable. Nothing is free.	The concern raised is anticipated to be addressed through training, which is already a commitment under the Strategic Objectives.
No additional comments	Noted. No Action Required.

Addressing Bribery and Corruption

Does the Strategy make it clear what people in the Isle of Man can do to recognise and respond to the threats of bribery and corruption?

Yes	23
No	3
Somewhat	22

Does the Strategy make it clear what people in the Isle of Man can do to recognise and respond to the threats of bribery and corruption?



■ Yes ■ No ■ Somewhat

Do you have any comments in relation to Addressing Bribery and Corruption?	You Said We Did
Government need to be held accountable	The comment is noted and a section on Government accountability has been added to the Strategy.
This brings the risk of further persecution. The cost of reporting some issues is too great	The comment is noted and a section on the need to encourage and safeguard whistleblowing has been added to the Strategy.
As the victim corrupt government officers my complaints and evidence were "lost" minutes of meetings were destroyed. Explanations were refused and actual targeting of my business due to whistleblowing have impacted my life.	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
It doesn't make clear what you can do when no-one takes any notice of you.	The comment is noted and the Strategy updated to provide further details of how concerns can be raised and escalated.
Risk assessments, case studies and sector specific guidance are promised as part of the the strategy. They should help to explain how practically to identify and tackle instances of B&C.	Thank you for your input. The Strategy commits to providing guidance which will form part of its ongoing implementation.
Have I missed a whole chunk of the definition of B&C or are you referring to the 3 vision statements that are so general they mean nothing ?	There is no suggested amendment to the Strategy, although it has been updated to provide greater clarity.
It should be emphasised that we all live on a world stage now and that bribery/corruption can come from any part of the world at any time	This comment is noted and the Strategy has been updated to reflect this.
It was not very clear what channels people can use to report bribery and corruption.	This comment is noted and the Strategy has been updated to include
There is an argument, in my opinion, for soft influencing. For example where Government ministers are lobbied. They should then be excluded from the decision making process.	This suggestion is noted and will be considered under Strategic Objective 2 – Reduce vulnerabilities to bribery and corruption in the public sector
I am writing from a charity. The strategy states: "Charities, too, should ensure that they have adequate procedures in place to mitigate potential risks of charitable donations being used for the purposes of	Thank you for your feedback and question. Your comments will be passed on to agencies with oversight for Charities on the Isle of Man Charities Register.

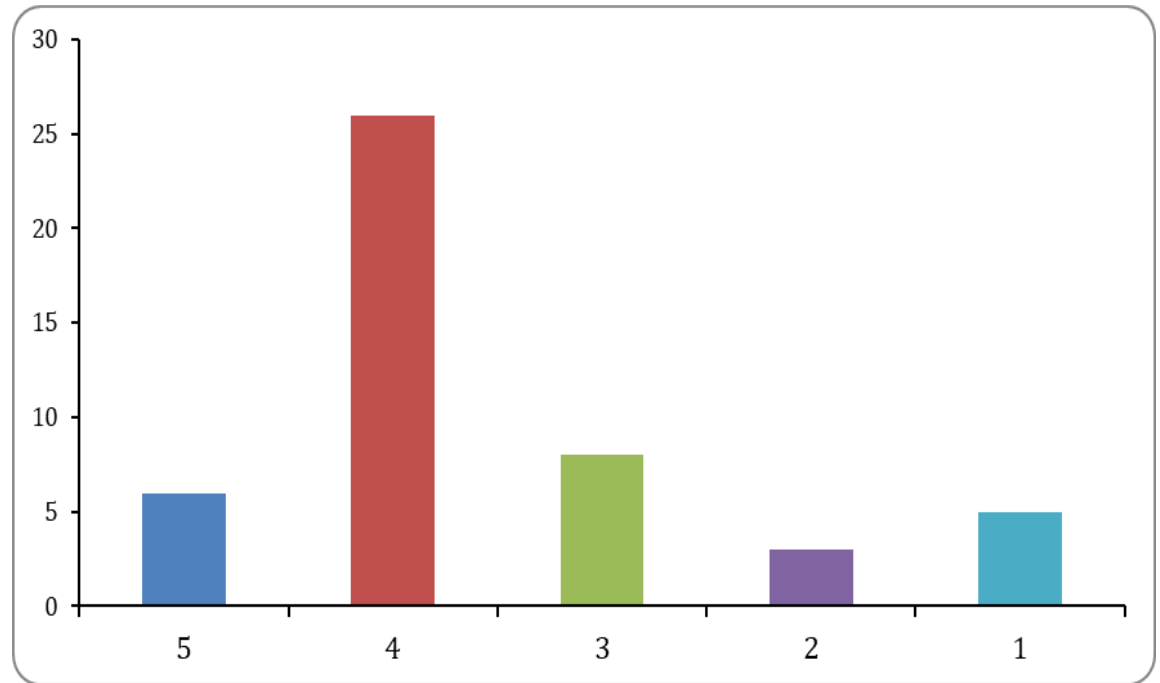
<p>bribery or corruption."</p> <p>We have previously found the IOM to enforce a number of time-consuming and duplicitous checks on our programmes which undermines our own policies and adds workload. Could it be made more clear what the IOM expects to see from charities with the understanding that we are often highly regulated and will have sufficient policies in place?</p>	<p>The Strategy has been updated to provide greater clarity on how all commercial organisations, including Charities, can reduce vulnerability to bribery and corruption. Training for the charitable sector will also be considered as part of Strategic Objective 4 - Improve detection, reporting and enforcement in respect of both domestic and international bribery and corruption.</p>
<p>I think it would be better if the last sentence in the second paragraph finished with "...will deliver actions designed to prevent, detect and respond to bribery and corruption."</p> <p>Detection is an important aspect of Strategic Objective 4 and hence , it is important that it is reflected here.</p>	<p>The suggestion is noted and the Strategy updated accordingly.</p>
<p>We very much welcome the Strategy's recognition of the role that needs to be played by local authorities in the Island's fight against bribery and corruption, and the need for the Cabinet Office to interact with local authority institutions, as part of the wider public sector.</p> <p>One query would be in connection with the suggestion that local authorities issue anti-bribery and corruption guidance to all staff – will a proforma generic set of guidelines for use by all local authorities, in the interests of efficiency, be issued by either the Cabinet Office or the Local Government Unit to assist with this?</p>	<p>Thank you for your feedback.</p> <p>The Strategy commits to the provision of advice and guidance to all commercial organisations who require assistance, including Local Authorities.</p>
<p>Attention needs to be focused on the many 'bad apples' in the legal profession and strong action taken. There is widespread - The abuse of entrusted power by a person or organisation for private gain, financial or otherwise.</p> <p>I see procurement, recruitment and hospitality singled out and feel not adding the legal profession is a serious omission.</p>	<p>The comment is noted. The Strategy has been amended to include reference to gatekeepers and facilitators in higher risk categories.</p>

<p>Secondly the problem would NOT be solved by yet more compliance form filling which is already out of control.</p>	
<p>"Procedures Proportionate to Risk" might be a better heading in this section than simply "Proportionate Procedures"</p>	<p>Thank you for your suggestion. The UK and IOM Bribery Act Guidance refers to 'Proportionate Procedures' and in the interests of maintaining continuity with these documents, their language has been adopted.</p>
<p>Appreciating that this is a Strategy document, the narrative is too holistic to provide any real guidance to the general public in the Isle of Man as to what they can practically do to recognise and respond, and what they should expect to see by way of output from the various agencies involved.</p>	<p>The comment is noted. The Strategy has been amended to include the role of each agency in addressing bribery and corruption. The Strategy also commits to the provision of guidance, including 'red flags' and how to respond.</p>
<p>Page 12 tells people what they should do - not necessarily how to do it.</p>	<p>This comment is noted. The Strategy has been updated to clarify that it is the responsibility of organisations to implement their own operational procedures to meet the Bribery Act's definition of 'adequate procedures'. Further information has been added on how to report concerns.</p>
<p>Again, this definition needs clarification within government depts. External corporations mostly have processes to capture free gifts, conflict of interest processes.</p>	<p>The comment is noted. Strategic Objective 2 has been updated to include enhanced training for higher risk roles. Conflict of Interest policy development is already a commitment in Strategic Objective 2.</p>
<p>I think this will be readily understood by people in the financial services and professional services sector but it is not clear how other sectors such as the construction sector, where the risk of bribery and corruption is possibly higher, will be helped to understand how this applies to their industry sector. There seems to be a reliance in the strategy that people will 'get it' and take responsibility. I appreciate that there has been a programme of outreach to various sectors but it does feel like the regulated sectors will be more under scrutiny as they are the sectors that have oversight. Without oversight, there is likely to be little in the way of action in sectors which are not regulated.</p>	<p>The comment is noted. The Strategy has been updated to include reference to non-regulated in 'Defining the Issue' and 'Addressing Bribery and Corruption'. High risk sectors will be included in the Sector Specific Guidance committed to in Strategic Objective 4 - Improve detection, reporting and enforcement in respect of both domestic and international bribery and corruption. While it is acknowledged that certain sectors are not regulated, the Bribery Act 2013 and accompanying Guidance are clear on the behaviour and action expected of all relevant commercial organisations.</p>

Strategic Objectives and Actions

Do you think that the Strategic Objective to 'Address the risks to the Isle of Man, identified in the National Risk Assessment 2020, in respect of Bribery and Corruption' and its associate actions will help the Island to achieve its aims of 'Protecting people from bribery and corruption'?

Score	Number of Responses
1	5
2	3
3	8
4	26
5	6



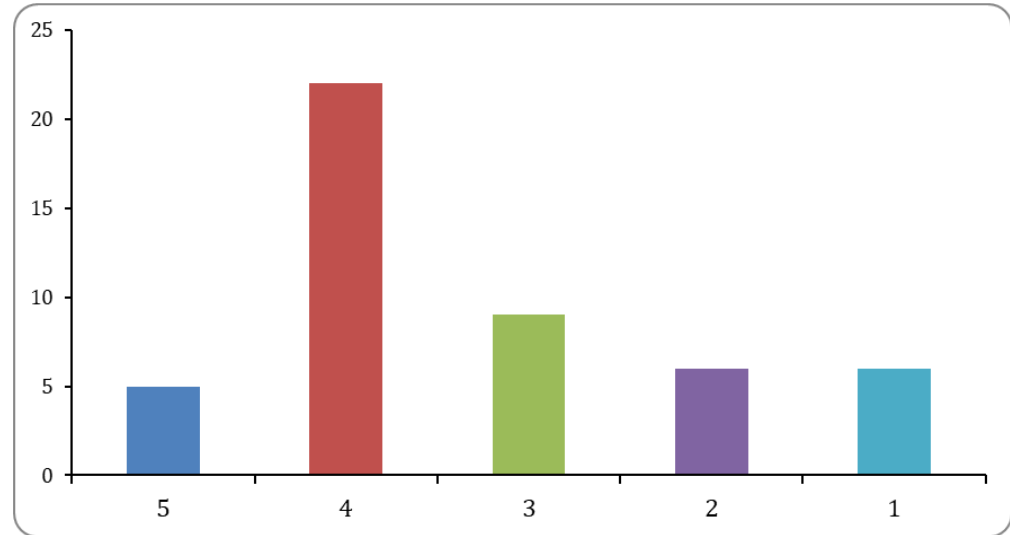
Do you have any comments in relation to this Strategic Objective	You Said We Did
Paper exercise to look good. Too many people have made complaints but no action taken.	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
Objectives are just fine BUT they will not be actioned, only as a tick-box exercise as most IOMGOV docs are. The only people who will suffer from this Strategy are the innocent not the ones who it is supposed to target.	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
<p>1 if we are lucky in my experience its all BS.</p> <p>eg, I called the police to report corruption under the Corruption Act 2007 and was told by the bent Copper answering my attempt to report Corruption by [redacted] when he was AG that, 'The Act does not mean that at all?!!!!'</p> <p>BLATANT CORRUPTION !!!!!</p>	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
Whilst it is recognised that bribery and corruption are predicate offences for ML, phase two actions would seem to conflate the two topics. Corruption and Money laundering are individually significant issues with differing characteristics and will ideally continue to be dealt with separately by the IoM.	Thank you for your input. While the two are separate offences, linking money laundering to bribery and corruption is necessary to understand the risks faced by the IOM as an international finance centre.
Action will speak louder than words.	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
Will everyone in the community understand what the NRA is and what the risks were?	Thank you for your question. A short description of the National Risk Assessment has been added to the Strategy.
No.	Noted. No action required.
It needs to address fraud risk also, particularly since the rise of cyberfraud attacks.	The link between fraud and corruption has been acknowledged.

<p>It's not clear how this document will be published or to who across the island or how the areas in the private sector who this should be aimed at , will take it seriously I.e. shady lone CSPs , immigration advisers & companies setting up non existent businesses to enable foreign nationals to get an IOM visa that them allows them to live in Uk without doing the work their visa was granted for</p>	<p>The Strategy will be published and apply to everyone in the Isle of Man. The examples provided in this feedback are acknowledged and will be taken into account in the implementation of the Strategic Objectives.</p>
<p>This objective and the actions listed provide a good starting point.</p>	<p>Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.</p>
<p>None.</p>	<p>Noted. No action required.</p>
<p>The heart of the document is in the right place, but at present it's all just words - and rather too many of them</p>	<p>Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.</p>
<p>Flawed systems within government allow staff access to data for which they have no business. Data can be accessed for their own personal gain. Access to the AG's office to discriminate against small businesses for own personal gain, in my book, is corruption. So you really need to start internally. Refusal of FOI's with the pretence of menacing behaviour as an excuse is blatantly just a reason to cover up internal use of departments/information for personal gain.</p>	<p>Thank you for the feedback. While specific issues relating to GDPR and FOI fall outside of the remit of the Strategy, these comments will be passed to the relevant bodies.</p>
<p>See previous comment about ensuring that all sectors play their part</p>	<p>This comment is noted and will be taken into account when sector specific guidance is delivered.</p>

Strategic Objective and Actions

Do you think that the Strategic Objective to 'Reduce vulnerabilities to bribery and corruption in the public sector' and its associated actions will help the Island to achieve its aims of 'Protecting people from bribery and corruption'?

Score	Number of Responses
1	6
2	6
3	9
4	22
5	5



Do you have any comments in relation to this Strategic Objective	You Said We Did
<p>Bribery and corruption is, in my opinion, rife within the public sector. Not at the lower levels i.e. the people who actually do the day-to-day work but at higher levels. How else could such disasters as the Prom, Richmond Hill etc. happen without contracts being given out to the wrong people. Not just wrong but totally incapable of doing the job.</p>	<p>Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.</p>
<p>IOM GOV TOO BENT</p>	<p>Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.</p>
<p>Should this objective be solely about reducing vulnerabilities or should it include / address the role of the public sector in promoting transparency, being accountable to the electorate for tax payer spending etc... It just feels that there is much more the public sector should / could be doing here.</p> <p>Phase One actions : "Engage with Local Authorities to deliver recommendations and guidance to reduce vulnerabilities to bribery and corruption [and increase transparency]".</p> <p>Phase two actions; publish details of all grant funding provided is mentioned. Whilst there is already some open 'public procurement' data available, is this an opportunity for the government to re-iterate and enhance its commitment to 'open data' particularly on capital projects, infrastructure contract awards etc.</p> <p>The public officials reporting obligation contained in primary legislation might also be re-iterated here.</p>	<p>Thank you for your comments which are noted.</p> <p>Wording has been amended as suggested.</p> <p>This comment has been noted.</p> <p>This has been added, as suggested.</p>

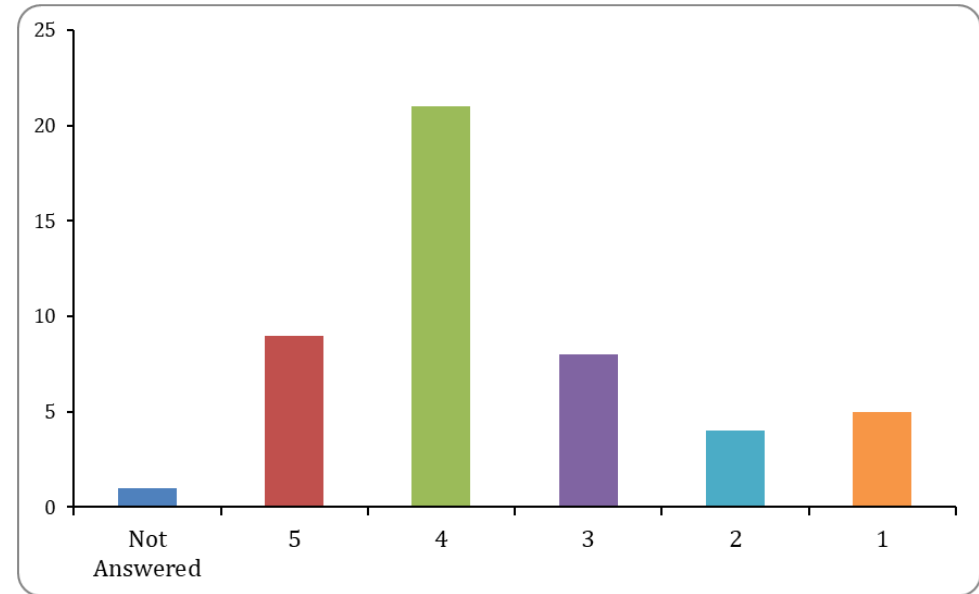
<p>The key will be how this objective is addressed - conflicts exist in every jurisdiction but more so in a small one like the IOM - use of consultations by the public sector needs to be handled carefully - I understand the desire to use on-Island based consultants where possible but potential conflicts should also be considered</p>	<p>Thank you for your input. The reference to consultants has been included as suggested.</p>
<p>The bullet points in this area are too focused on policy areas. From an operational perspective there is not enough focus on:</p> <ul style="list-style-type: none"> - Identifying key individuals (and possibly newly created roles) for the implementation and delivery of the strategy on a consistent basis across the public sector; - The delivery of continuous professional development and refresher training; and - Sharing examples of best practice from across the public sector. <p>Further, if the Isle of Man Government is serious about reducing vulnerabilities across the public sector then the Strategy should be more transparent about:</p> <ul style="list-style-type: none"> - What the current vulnerabilities are? - What specific actions it intends to take? - How it intends to fund these actions? 	<p>The comment is noted.</p> <p>This suggestion has been added to Strategic Objective 5.</p> <p>This suggestion has been added to Strategic Objective 2.</p> <p>This suggestion has been added to Strategic Objective 2.</p> <p>This information has been added in 'Need to Act'. This information is covered in Strategic Objective 2.</p>
<p>Ditto regarding cyberfraud risk to the public sector.</p> <p>Some local authorities may not have sufficient expertise to assist in achieving this goal in any meaningful way. Also some local authorities will not have a robust internal audit function, which should play a part.</p> <p>Public sector bodies need to develop their own anti fraud and corruption risk registers and strategies.</p>	<p>The comment regarding cyberfraud has been noted.</p> <p>Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.</p> <p>This suggestion has been added to Strategic Objective 2.</p>

<p>Public sector employees are losing faith with the whistleblower policy as it does not give the the anonymity protection it says and senior managers & CEOs go on witchhunts</p>	<p>Thank you for your input. Further information on where those raising concerns can go for support has been added to the Strategy. Strategic Objective 3 makes reference to strengthening Whistleblower Protections. The comment is noted and will be forwarded on to the relevant agencies.</p>
<p>An interesting focus on local authorities. Perhaps one risk to which local authorities are exposed comes through uncontested elections.</p>	<p>Thank you for your input. Your comment has been noted.</p>
<p>Additional emphasis on ongoing training and awareness for public sector workers.</p>	<p>Thank you for your input. Your comment has been noted and the Strategy updated as suggested.</p>
<p>All civically servants should have to declare publicly if the have any conflict of interests when government work/contracts are awarded. All government employees should be made to declare if they own companies and the income generated each year, if it is from any government dept.</p>	<p>Thank you for your input. Reviewing and updating policies on conflict of interest is already an action under Strategic Objective 2. Your comments will be included as part of this work.</p>
<p>My understanding of government is that there is no centralised function to develop policies and procedures so I anticipate that each dept and statutory board will have to respond in its own way. Is there an intention for depts and statutory boards to be accountable for their policies and procedures in the same way that they have to self-assess against corporate governance requirements?</p>	<p>Thank you for your input. Your comment has been noted and included in ongoing discussion.</p>

Strategic Objective and Actions

Do you think that the Strategic Objective to 'Demonstrate that the Isle of Man has a coherent approach to combatting both domestic and international bribery and corruption' and its associated actions will help the Island to achieve its aims of 'Protecting people from bribery and corruption'?

Score	Number of Responses
1	5
2	4
3	8
4	21
5	9
Not Answered	1



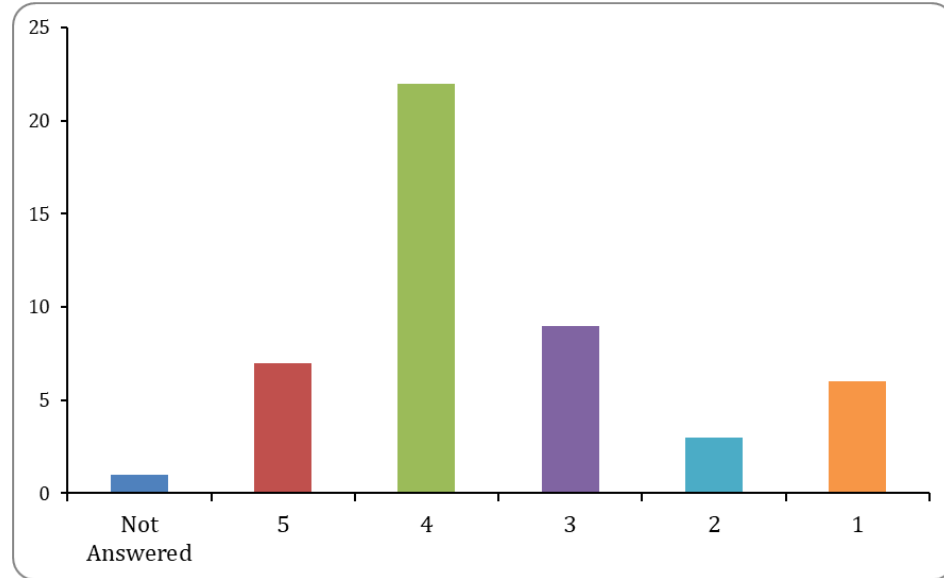
Do you have any comments in relation to this Strategic Objective?	You Said We Did
It will look good on paper BUT it will never really happen. Just yet more paperwork.	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
TO MANY INTERESTED PARTIES TO PROTECT WITHIN GOV	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
<p>Is there any opportunity / appetite for existing supervisors, or a branch within them, to include ABC 'adequate procedures' awareness, implementation and assessment of ABC programmes during their visits to regulated entities.</p> <p>This might be the strategic objective where 'managing the message' as to the Islands approach to ABC is addressed. i.e. will the Cabinet Office act as a co-ordinating authority to demonstrate (be that pro-actively or reactively) this coherent approach, our strategy and its application when critical international authorities, enquiring journalists come calling?</p> <p>Agree with the objective : "Engage with specific sectors to target and address emerging threats." But the "for example cybercrime." seemed a bit of a curveball? Can you either explain earlier on in the document how cybercrime is impacting/ facilitating corruption or that bribery/extortion payments through 'denial of service attacks' etc are an emerging trend.</p> <p>Perhaps the objective could read: "Engage with specific sectors to target and address changing and emerging threats." After all corruption has been around forever, so likely they will be changing threats as a result of geopolitical events.</p>	<p>Thank you for your comment. Your suggestion has been added to 'training' in Strategic Objective 4.</p> <p>The comment in relation to the need to demonstrate outcomes is noted.</p> <p>The comment is noted and the paragraph amended to remove reference to specific emerging threats.</p> <p>The comment is noted and the wording amended as suggested.</p>

Once again action will help as a deterrent.	Thank you for your comment, which is noted.
No.	No action required.
International risks will be more challenging to deal with, given the increased level of sophistication with cyberattacks etc.	The comment is noted and a further action added under Strategic Objective 5 to address this point.
It might do in terms of a piece of paper, but the reality is, those who follow it aren't usually the one who this should be aimed at..	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
Perhaps "Develop a coherent approach to combatting..." would be more appropriate than "Demonstrate that the Isle of Man has a coherent approach to combatting..." There is a lot of work to be done as shown by the list of actions.	The comment is noted and wording amended to 'Deliver a coherent approach to combatting both domestic and international bribery and corruption'.
None.	No action required.
I hope that the government brings in the same calibre of individual to run this, that they got to deal with the Island's international tax position. The current and previous Assessors have done a great job.	The comment is noted and will be forwarded to Income Tax Division. Advice will be sought from ITD regarding their recruitment and staff development processes for these roles.
All I can say is let's hope! I have worked in large corporations since I was 17 and the corruption processes are robust, even going back to 1989 when I was given a gift, it was declared! I appreciate the government is a large beast but it really is not complying with the rules it makes.	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
If momentum is maintained and there is accountability and transparency in relation to the various actions outlined in the document	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.

Strategic Objective and Actions

Do you think that the Strategic Objective to 'Improve detection, reporting and enforcement in respect of both domestic and international bribery and corruption' and its associated actions will help the Island to achieve its aims of 'Protecting people from bribery and corruption'?

Score	Number of Responses
1	6
2	3
3	9
4	22
5	7
Not Answered	1



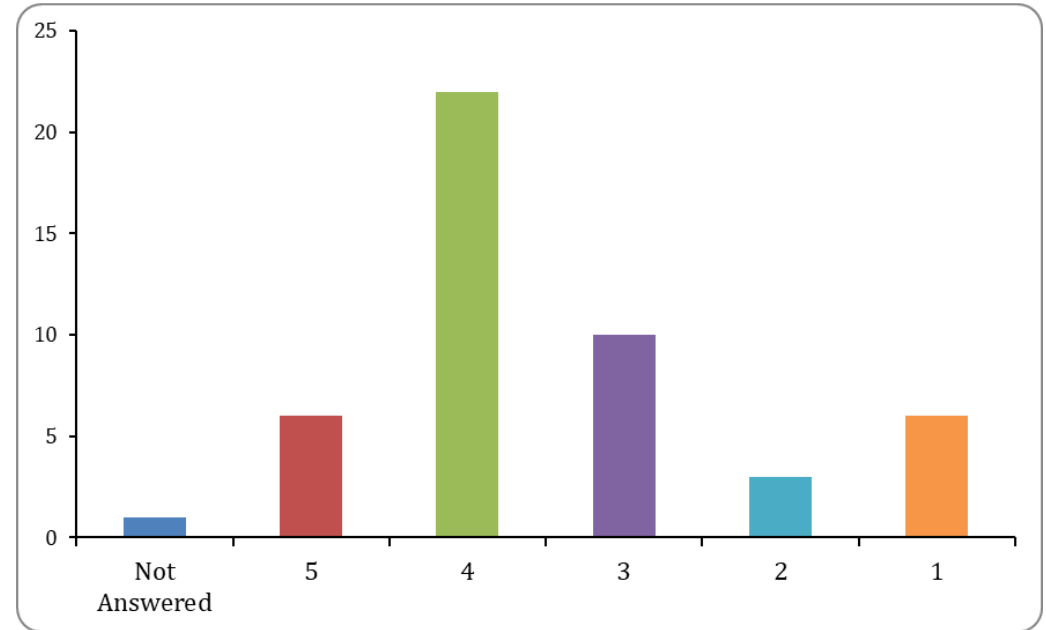
Do you have any comments in relation to this Strategic Objective?	You Said We Did
Same people investigating themselves, not really going to change.	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
Nope - just yet more paperwork.	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
TOO MUCH CLOSING OF RANKS TO PROTECT PERPS THE ARE WITHIN THE ESTABLISHMENT	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
As a UK based charity which has previously secured funding from the IOM, we have found it challenging to comply with all the requirements because our own documents have not been exact equivalents.	Thank you for your comment. This will be noted and shared with relevant agencies.
<p>I am supportive of the introduction of Unexplained Wealth Orders ('UWOs') subject, to separate consultation on this matter and the island implementing a legislative framework that addresses those issues identified from the introduction of UWOs in the United Kingdom.</p> <p>I believe the actions led by operational areas need refinement, especially in the Public Sector to reduce vulnerabilities. Examples follow:</p> <ul style="list-style-type: none"> - Vetting on financial and non-financial assets (including grants etc) by rotation every 3-4 years should be undertaken for individuals that key decision takers and/or influencers across the public sector: Politicians, Ministers, Departmental members, Civil servants, Commissioners, Clerks. Areas covered should include: Procurement and individuals associated with infrastructure projects (e.g. Town and Country Planners). 	<p>Thank you for your comment. Consultation on all legislation is standard as part of the process.</p> <p>The comment is noted. To include in work undertaken within Strategic Objective 2 – Phase 2.</p> <p>The comment is noted. To include in work undertaken within Strategic Objective 2 – Phase 1.</p>

<p>- Identifying gaps in procurement policies and procedures, such that work on major projects is not split up into lots of little projects and "preferred" business, rather than being subject to a more transparent competitive tendering process.</p> <p>- Having a better focus on operational actions around the use of cryptocurrencies to conceal acts of bribery and corruption.</p>	<p>The comment is noted and a more general action under Strategic Objective 3 has been added.</p>
<p>Ditto above</p>	<p>No action required.</p>
<p>There's no mention as to how this will be monitored, measured or reported on. Does the policy actually have any teeth?</p>	<p>Thank you for your enquiry. This is a Strategy and, should it be approved, Policy, Regulations, Legislation etc will follow.</p>
<p>Inclusion of the word 'both' at the end of the final bullet point under 'Actions led by operational areas' looks to be an error.</p>	<p>Thank you for your comment. This has been corrected.</p>
<p>As noted above - the confidential reporting line is needed for all the objectives. Not just this one.</p>	<p>Thank you for your input. To confirm, Confidential Reporting will be available for public and private sector, and members of the public.</p>
<p>If there is sufficient engagement by all sectors on the Island</p>	<p>Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.</p>

Strategic Objective and Actions

Do you think that the Strategic Objective to 'Deliver a long-term and sustainable model for addressing the ongoing risk to the Island from international and domestic bribery and corruption' and its associated actions will help the Island to achieve its aims of 'Protecting people from bribery and corruption'?

Score	Number of Responses
1	6
2	3
3	10
4	22
5	6
Not Answered	1



Do you have any comments in relation to this Strategic Objective?	You Said We Did
You need to wait for the old guard to retire.	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
TOO MANY CRIMINAL IN GOV TO WORK	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
Primary exclusion from long term model is the lack of actions addressing domestic corruption and the role to be played by and within government going forward.	The comment is noted and further reference made to addressing domestic bribery and corruption.
<p>Overall, the document is quite good however, when I read this section I formed an impression that many of the proposed actions throughout the document were not specific, measurable and timely.</p> <p>Further, I am not clear about:</p> <ul style="list-style-type: none"> - The frequency with which this strategy would be reviewed and updated; - Whether a more comprehensive plan would be issued, by when and for what period, with objectives and actions that are specific, measurable, achievable, realistic and timely; and - Whom would be responsible for independently and objectively accessing the Isle of Man Government's performance against this strategy. It is Moneyval or the Tynwald Auditor General? <p>Consequently, further refinement of this document is required.</p>	<p>The comment and suggestion to be more specific regarding timescales for delivery of actions are noted.</p> <p>Questions are noted and responses provided below:</p> <p>This would be annual – the document now reflects this; An Implementation Plan will follow should the Strategy be approved;</p> <p>The Strategy has been amended to include details on how delivery will be assessed and by whom.</p>
No, it's simply a document, words without actions are meaningless	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
None.	No action required.
You could look to other organisations as well as other jurisdictions for sharing information and best practice.	The suggestion is noted and the Strategy updated accordingly.

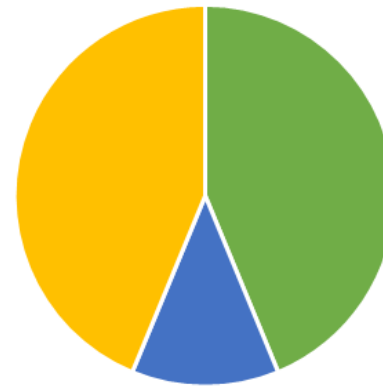
<p>The same techniques for finding and dealing with corruption issues apply to such disparate organisations as accountants or lawyers who have strong, written, ethical guidelines and controls in place to avoid bribery etc, and also manufacturing companies where corrupt practices and failures in safety controls can lead to loss of life.</p>	<p>These comments are noted.</p>
<p>Until FOI's are freely given, it is obvious that cover ups are happening and internal departments are still being used for personal use. You need a lock down of systems and traceability. All FOI's should go to GTS and not the department who you are requesting information from.</p>	<p>Freedom of Information legislation is outwith the terms of the ABC Project but the comment will be passed on to the relevant agency / agencies.</p>
<p>If there is sufficient engagement by all sectors on the Island</p>	<p>Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.</p>

Beyond the Strategy

Do the Key Indicators make it clear how each Strategic Objective will be measured?

Yes	21
No	6
Somewhat	21

Do the Key Indicators make it clear how each Strategic Objective will be measured?



■ Yes ■ No ■ Somewhat

Do you have any comments in relation to Beyond the Strategy	You Said We Did
Just yet more Civil Servants will be needed to measure the Objectives and their results.	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
The key indicators are not defined so cannot make a judgement on this	The comment is noted. It is more difficult to put quantitative or percentage increases on indicators, however they can create a benchmark against which new targets can be identified. The Strategy has been amended to reflect this.
AM I MISSING A WHOLE CHUNK OF INFO SOMEWHERE?	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
In areas rather bland.	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
The majority of indicators are quantitative which does not always truly measure impact.	The comment is noted and qualitative measures will be considered.
There a lot of indicators to measure - what is the purpose of each? Will be better able to comment once it is outlined exactly how indicators will be measured and reported	Thank you for your feedback. It is intended that these measures will bring structure. Each should hopefully demonstrate a different way the Island is addressing bribery and corruption.
At first glance the key indicators look quite good however, without targets and dates it is unclear how those responsible for implementing this Strategy will be held accountability for their actions.	The suggestion is noted and targets and dates will be considered for inclusion in an Implementation Plan.
Yes, though some KPI's are subjective or difficult to measure. NB typo if word International under section 3.	The comment is noted. It is more difficult to put quantitative or percentage increases on indicators, however they can create a benchmark against which new targets can be identified. The Strategy has been amended to reflect this.

	Typo has been corrected.
How are the key indicators going to be monitored & by who? Will progress against the key indicators be measured? What is the benchmark for the key indicators? Will meaningful information showing performance against key indicators including explanations, be published publicly?	This will be addressed in an Implementation Plan.
I recognise that this is a difficult area. Most of these indicators are about having process in place rather than providing: "a measure of how well each of the Strategic Objectives is achieving its aims" - given that these aims are fundamentally about protecting people from bribery and corruption. Even indicators such as "increased reporting of bribery and corruption" are not clear - perhaps the increased reporting simply reflects increased bribery and corruption. Might it be possible to provide an Index of Risk relating to bribery and corruption. Could this be measured?	The suggestion is noted and an Index of Risk added to Key Indicators.
Spelling mistake at the start of the 6 bullet point under the third key indicator.	Noted and corrected.
The "quantitative surveys" mentioned in para 2 on page 18 should include the question "Has your employer every stopped an otherwise profitable activity because it was unethical / unsafe ? " and " if the occasion has not arisen, do you believe they would do so?" That is how you measure "tone from the top"	The suggestion is noted and the question will be considered for the next quantitative survey.
I'm not getting a sense of how engagement will be enhanced through transparency as to how we are getting on with each of the actions set out. How will that message be delivered outside of things like the AML/CFT Advisory Group where the unregulated sectors are not represented?	The comment is noted and will be added to an Implementation Plan as one of the areas requiring addressing to deliver Strategic Objective 3.

Overall	
Do you have any overall comments in relation to the Anti-Bribery and Corruption Strategy?	You Said We Did
Interview actual whistleblowers and assist them rather than close down any complaint and let the person accused investigate it themselves. Surprisingly the accused finds themselves innocent and targets the whistleblower.	Thank you for your comment. Your recommendation will be passed on to the relevant bodies.
Bribery & Corruption is endemic, in my opinion. The Strategy will never be able to control this. If your face doesn't fit or your handshake isn't right or your money isn't enough you won't get past the starting point.	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
People investigating must be highly trained and beyond reproach	The comment is noted and will be considered as part of Strategic Objective Two through the addition of a CPD or training requirement.
The strategy is clear. Practical examples and guidance - risk assessments, case studies and sector specific information - will be welcomed when they are available to upskill staff and look to enhance procedures.	Thank you for your feedback. Practical examples will be provided as part of an Implementation Plan.
ARREST THE CORRUPT PEOPLE IN GOV GETTING AWAY WITH MURDER	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made.
It is easy to think that Bribery and Corruption can only affect large corporations but the strategy shows that even charities could be affected and should take this seriously.	Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.
There is a necessity to ensure clear and effective implementation of the strategy	The comment is noted and an Implementation Plan will be developed.
These areas definitely require addressing	No action required.
Great document (couple of typos requiring review pgs 17 & 20) ! Widely accessible, readily understandable and a very positive reflection of the IoMs position and approach to domestic and international bribery and corruption.	Thank you for your feedback and typos have been corrected.

<p>Laudable, but the effect on local small charities has been disproportionate to the risk involved. The document says that the approach should be risk based, but personal experience suggests otherwise. It is becoming very difficult to seek volunteers to step forward as trustees and in my case as independent examiners of financial statements. I am involved with many charities and find that this is a common problem. It is difficult to identify where my successors will come from.</p>	<p>Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however and will be passed to the relevant bodies responsible for Charity registration and governance.</p>
<p>A very clear and well-thought through document with high ambitions.</p>	<p>Thank you for your feedback. No action required.</p>
<p>This is important as we need a safe secure and well regulated economy.</p>	<p>Thank you for your input. As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.</p>
<p>Support the concept</p>	<p>Thank you for your feedback. No action required.</p>
<p>The development of the Anti-Bribery and Corruption Strategy is a good idea however, I have concerns about its implementation given the number of agencies involved currently (see the 'Creating a Coherent Response' section).</p> <p>It would be preferably if one of these agencies took a lead for implementation the Strategy.</p> <p>Further, when it comes to assessing the public sector's performance against the strategy I'm a strong advocate for that role being performed by MoneyVal or Tynwald, not internal government bodies such as the Cabinet Office or Treasury's Audit Advisory Division.</p> <p>The public needs to be satisfied that those assessing the Government's performance against the Anti Bribery and Corruption Strategy are beyond reproach. This concept is not yet reflected in the Strategy.</p>	<p>Feedback is noted. The Cabinet Office will lead on policy areas and agencies on operational areas.</p>
<p>Highly supportive of this project. I look forward to the support and guidance available from the Cabinet Office. This would also be a</p>	<p>Thank you for your feedback. Guidance will follow as part of the Implementation Plan.</p>

<p>useful place for whistleblowers to anonymously seek support and advice.</p>	
<p>Someone has spent a lot of time putting this together presumably to tick a box.</p> <p>No mention of actually how this document will change the corruption that we see in the private finance and legal sectors as highlighted by investigative journalism such as the paradise papers etc.</p> <p>Nice document though that ticks a box and is good on a coffee table</p>	<p>Thank you for your feedback. The Strategy sets out how the Island aims to address these risks and how our progress will be measured.</p> <p>As this is a general observation, no specific update to the Strategy will be made. Your comment has been noted however.</p>
<p>The Isle of Man, as an international finance and business centre, is potentially vulnerable to the threats posed by bribery and corruption and action is needed to protect the Island's reputation. This strategy is a good attempt to address these risks on a broad range of fronts.</p>	<p>Thank you for your feedback. No action required.</p>
<p>The publication of a strategy document is welcomed and we are supportive of the proposed strategic objectives and associated actions. As a private sector business, which is already subject to a significant amount of regulation in this area, we are satisfied that we operate within a solid, well documented and understood framework. We remain mindful and alert to customer detriment and the associated impacts that this could also have on our business and the wider Island economy and reputation. However, we continue to see examples both domestically and internationally where it is arguable that businesses, under the guise of building relationships, could be inappropriately incentivising business partners. This may be arising from incorrect interpretation or poor implementation, however we see little evidence of proactive engagement and oversight in this area. This said, we are also supportive of an environment where the ethical development of relationships is encouraged. A balance must be sought to ensure that the overriding framework does not hinder</p>	<p>Thank you for your feedback. The points raised in respect of relationship building are acknowledged and this will be added to specific activities under Strategic Objective 3.</p>

<p>legitimate business development and thereby encourage business partners to look outside of the Isle of Man.</p>	
<p>Only that it is an important piece of work in ensuring IOM remains at forefront of Best Practice</p>	<p>Thank you for your feedback. No action required.</p>
<p>As my first comment above. Too long, and too repetitive and a mish mash of headings. Even in the Executive summary you start with "Statement and vision" then the next heading but one is "Our Vision.... " It is very hard to follow, though the document is full of good stuff. It just needs some harsh editing.</p>	<p>Thank you for your feedback. The comments regarding running order have been noted and the Strategy amended to improve flow of information.</p>
<p>The strategy renders itself oblivious to the most prevalent form of bribery and corruption on the Isle of Man by focussing on bribery toward individuals to the exclusion of examining institutional bribery and corruption.</p> <p>Bribery occurs en masse in the Isle of Man and other offshore jurisdictions, which most individuals concerned don't even realise. It isn't one public servant receiving £50,000 to turn a blind eye to criminality but more like 5,000 individuals benefitting directly from an inherently criminal billion-pound industry, and the rest of the Isle of Man benefitting indirectly. These individuals receive a generous salary for their ability and effort; they receive a prestigious role, belonging, purpose, and safety in numbers. They don't even need to be aware of the nefarious business they facilitate as long as they can avoid looking at the bigger picture and joining the dots; when one is within this obfuscated system, one doesn't see the wood for the trees and were individuals to realise it and their role within it they'd struggle live with the horrible truth of it.</p> <p>Catherine Belton's critically acclaimed book Putin's people sets out Russian's strategy for corrupting Western democracies, through the wealth the state has passed to Russian oligarchs who in turn act as KGB pawns.</p> <p>If the IoM strategy doesn't address how Russia (which passes a lot of money through the IoM) might be corrupted by Russian money,</p>	<p>This comment has been acknowledged and addressed.</p>

<p>then the IoM's Bribery and Corruption strategy is nothing more than an empty PR exercise. Consider the fact that the top regulatory, and judicial roles are populated by individuals who have benefitted from laundering Russian money. Consider the fact that Bridgewater's was allowed to operate so long under the effective control of [redacted] whose fraud during the Scottish Power scandal should have ruled him out of his key officer role. Consider the lack of independence within and between the Manx Justice system and the financial sector, which effectively demotes the rule of law below the rule of patronage, and in doing so makes the island extremely susceptible to the corruption of a self-serving cabal. Consider Corruption and Bribery on a cultural and institutional level. I am party to a case in which it appears that Manx authorities deliberately allow the IoM's largest financial service provider to maintain a read and write backdoor to their systems, which is readily exploitable to tech-savvy regimes like Russia.</p>	
<p>The Isle of Man is a small place and lots of people know what goes on. The finance and e-gaming sector has made the island a place to be proud of and given individuals great opportunities. The government now needs to amend their ways and stick to the rules that they write. More transparency in the public sector is required.</p>	<p>The comment is noted. Reducing vulnerability to bribery and corruption in the public sector is identified as a Strategic Objective and actions suggested to deliver this.</p>
<p>Nothing additional other than to say thanks for all of the work that has gone into this to date and we look forward to supporting the delivery of the strategy.</p>	<p>Thank you for your feedback. No action required.</p>