Government of the Republic of Trinidad and Tobago

Ministry of Housing and Urban Development

HUD: 3/7/17

April 18, 2018

Ms Jacqui Sampson-Meiguel
Clerk of the House
Parliament of the Republic of Trinidad and Tobago
Level G-9, Tower D
The Port of Spain International Waterfront Centre
1A Wrightson Road
Port of Spain

Dear Ms Sampson-Meiguel

Re: Eleventh Report of the Public Accounts Committee on the Examination of the Audited Financial Statements of the Land Settlement Agency for the Financial years 2008 and 2009

I make reference to your letter Ref: Parl.: 5/1/22, dated January 25, 2018, on the subject as stated above.

The Report at caption has been reviewed and a response prepared as required. The Ministry of Housing and Urban Development is hereby submitting this response, which is attached to this correspondence.

The Ministry recognises the lateness of its submission and apologises for this.

Yours Sincerely

Ms Simone Thorne Mora-Quinones
Permanent Secretary (Ag)

Eleventh Report of the Public Accounts Committee on the Examination of the Audited Financial Statements of the Land Settlement Agency for the Financial Years 2008 and 2009 – Response of the Land Settlement Agency

Issues and Recommendations	Recommendations of the Public Accounts Committee	Actions
1. Submission of Audited Financial statements a. Board Oversight and Monitoring b. Building of institutional capacity in the finance Department	• The MHUD should take the lead, as a matter of urgency, and ensure that LSA submits a report on what actions will be taken to have all outstanding financial statements completed and submitted to the Parliament by February 28, 2018; and • The Permanent Secretary should assign an existing member of staff oversight responsibilities over LSA's systems of accountability.	**The recommendations of the Committee are noted.** The last audit conducted by the Auditor General for the LSA was for Financial Year 2011. A letter was sent to Auditor General in December 2017 reminding and requesting that all outstanding years be audited as soon as possible. Efforts are currently being made to employ a Monitoring and Evaluation (M&E) Officer in the Ministry (this is before the Public Management Consulting Division). In the interim, the Ministry's Economic Research and Planning Unit performs some M&E function, overseeing all agencies, including LSA.
2. The Regularisation of squatters on State land	• The MHUD, the Ministry of Agriculture, Lands and Fisheries and Ministry of Rural Development and Local Government should initiate inter agency collaborations between the Central Statistical Office (CSO), town and Country, Municipal Corporations, and the commissioner of State lands and LSA to properly manage state lands and review and implement the existing laws and standards to regularise persons;	**The recommendations of the Committee are noted.** The Containment Unit of the LSA continues to strengthen its Containment Networking by working closely with other State Agencies such as the Commissioner of State Lands (COSL), Forestry Division, Water and Sewerage Authority (WASA), Estate Management and Business Development Company (EMBD), Palo Seco Agricultural Enterprises Limited (PSAEL), and Regional Corporations, to monitor and protect state lands. Public Awareness is an important component of the Agency's efforts to contain squatting. This involves educating the public

Issues and Recommendations	Recommendations of the Public Accounts Committee	Actions
	• LSA when conducting its patrol of sites should report its findings to the Commissioner of State lands and Regional /Municipal Corporations effective immediately; • The Commissioner of State Lands and Ministry of Rural Development and Local Government should identify liaison officers to receive and process this information in a timely manner. MHUD should ensure that reports are indeed submitted to the Commissioner of State	about the negative socio-economic and environmental impacts of squatting. However, the containment legislation must be reviewed and strengthened in order to curb new squatting. Several key areas, external but related to the containment legislation have been critically examined and researched: a) Adverse possession b) Alternative tribunal to resolve challenges and disputes c) Processes to effect service d) Definitions of State Land e) Self-help by the State and/or its agents The LSA continues to actively patrol and monitor sites, and reports all new incidences of squatting / illegal structures to the COSL and Municipal Corporations on a weekly basis. Field Officers of the LSA also work closely with the Regional / Municipal Corporations by attending monthly Regional Corporation Committee Meetings to report findings and deal with squatter regularisation matters. By Cabinet Minute No. 836 of March 20, 2014, the previous Cabinet agreed inter alia: "To approve the Squatter Containment Policy (Appendix 1 of that Cabinet Minute) and that the said Squatter Containment Policy be used to guide the drafting of the proposed amendments to the

Issues and Recommendations	Recommendations of the Public Accounts Committee	Actions
	Lands and Regional /Municipal Corporations; and • As a matter of urgency, LSA, the Municipal corporation and the Commissioner of State lands , should set out how they intend to improve the regularization of state lands for which they are responsible and submit a report to the Committee by February 28, 2018	State Lands Act Chapter 57:01 and the State Land (Regularisation of Tenure) Act, Chapter 57:05." The existing Draft Bill containing amendments to the captioned legislation in accordance with a 2014 Cabinet Minute, has not been revoked. A team of critical stakeholders has been identified, led by the representative from the Office of the Attorney General, to review the existing legislation. The team comprises representatives from the following Ministries/Agencies: i. Land Settlement Agency; ii. Registrar General: Land Registry Department; iii. Ministry of National Security: TT Defence Force & TT Police Service; iv. Ministry of Housing and Urban Development (MHUD); v. Ministry of Agriculture, Land and Fisheries: Legal, COSL, Conservator of Forests; vi. Ministry of the Attorney General and Legal Affairs: P.S. Secretariat & Chief Parliamentary Council (CPC); vii. Ministry of Works and Transport: Director of Maritime Services; viii. Ministry of Public Utilities. Some of the items identified for review and action in relation to the legislation and policy framework governing state lands regularization:-

Issues and Recommendations	Recommendations of the Public Accounts Committee	Actions
		1. Each represented agency would submit comments and suggestions (relative to the policy document and related to their respective agency), as soon as possible for collation. The LSA submitted same on May 18, 2017; 2. Issues identified as necessary for inclusion in the policy document: a) Recognition that State Lands includes the foreshore and sea-bed; b) Cross Reference to be made to Territorial Sea Act; c) Clearly defined process for the TTPS,TTDS and the COSL to work in tandem; d) A Task Force be established which comprises of different protective Services/ad hoc Task Force to undertake continuous patrols; e) Relevant provisions of the Archipelagic Act (No. 24 of 1986) to be utilised with regard to enforcement; f) Memorandum of Understanding – Assignment of Liaisons assigned to COSL; g) SRPs- Assigned to form specialist Task Force which would provide specialist assistance to COSL/ Praedial Larceny Squad – Task Force assigned comprising of SRPS ; h) Complete removal of adverse possession –complete debarment. Reserves are not limited to forests but also include, rivers, oil, road, et al; i) Ministry of Public Utilities-Cabinet Minutes 2000 & 2014 – squatters on State Lands to be provided with Social Amenities.

Issues and Recommendations	Recommendations of the Public Accounts Committee	Actions
		This should be cross referenced in the Revised Policy document and clarity should be provided in relation to the fact that an amenity would only be provided to persons who have a valid right to occupation; j) Approach with respect to removal of structures on land as well as sea; k) Regulations to be made for enforcement; l) Enforcement professionals and COSL to outline roles and responsibilities; and m) PRESD- what is necessary in terms of State Management with particular regard to state quarters and buildings; and 3. A meeting is pending with the Office of the Attorney General.
3. Outsourcing of In-House capabilities	• To reduce the cost of hiring consultants, LSA must fill the vacant positions and improve the technical capabilities by February 28, 2018; and • The Ministry should designate a named official with responsibilities for ensuring that value for money is being achieved	**The recommendations of the Committee are noted.** However, the LSA has only been receiving funds to meet cost of salaries for current employees. As such, we are unable to fill any new positions at this time. Furthermore, we have sought approval for filling of contract positions within the Agency's organisational structure and we now await same. Efforts are currently being made to employ a Monitoring and Evaluation (M&E) Officer in the Ministry (this is before the Public Management Consulting Division). In the interim, the Ministry's

Issues and Recommendations	**Recommendations of the Public Accounts Committee**	**Actions**
	with projects being undertaken by the LSA.	Economic Research and Planning Unit performs some M&E function, overseeing all agencies, including LSA.
4. Challenges experienced by the LSA	• Given the prevailing financial and operational challenges being faced by the LSA on a regular basis, the Committee recommends that the LSA in collaboration with its line ministry undertake/facilitate a review of the operations of the agency with a view to: a. Looking at cost containment strategies to reduce the development cost of individual lots; b. Collaborating with the Central Statistical office must design and implement a data validation process of persons on State lands; • LSA should set out its plans for a revised approach for early intervention to reduce the challenges encountered. These should cover: how it will put in place effective prioritisation; planning innovative projects in phases; and planning for public engagement on	**The recommendations of the Committee are noted.** Over the years the Agency has engaged in a number of mechanisms geared towards reducing the development costs of developments Measures taken to reduce costs includes: • Proper land use and environmental planning & surveying works before the start of any construction works. This ensures firstly the feasibility of the development and highlights any issues that will not achieve value for money; the Agency will work best to mitigate against such. Designs are also done to ensure that the sites can reach full developmental standards. • The Agency practices 'Value Engineering' which is defined as the systematic method to improve upon the value of the product by using an examination of the function. Value is therefore the ratio of function to cost. Value can be increased then, by either improving function (more lots per development) or reducing the cost. The Agency ensures that works are accelerated as much as reasonably possible, reduces cost in certain areas and works with the Contractors to improve efficiency. • All works are done with the intent of meeting all regulatory standards. Therefore, the Agency works closely with the

<table>
<tr><th>Issues and Recommendations</th><th>Recommendations of the Public Accounts Committee</th><th>Actions</th></tr>
<tr><td></td><td>projects which aim to change behaviour; and

• LSA should submit a report to the Parliament on the status of the initiatives being undertaken to reduce the challenges encountered by February 28, 2018</td><td>various Agencies with the goal of not only ensuring safety, but minimising cost where necessary.
• In the past, the Agency applied an incremental development model, where only particular works were done on a site (eg. drainage works or road works alone). The Agency would have prioritised works according to necessity. Areas may have then received assistance to do further works through ‘Self Help’ initiatives or from other State Agencies (Eg Regional Corporations). While this model does in fact keep cost down as opposed to applying full development standards, issues arise when trying to seek approvals.
• The Agency practices stringent tendering practices, competitive bidding and full transparency.
• As far as reasonably possible, the LSA minimises hard engineering solutions and utilises the natural conditions. This means that works such as paving of water courses and cutting of slopes are minimised.
• Modern construction techniques and materials are also used which are more durable and would require less maintenance over time.

A breakdown of development costs is attached in Appendix I.

• The LSA has continued to be a data-driven Agency, conducting Social Surveys to obtain data on occupants of sites</td></tr>
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Issues and Recommendations	Recommendations of the Public Accounts Committee	Actions
		in order to understand development needs. Data collected includes: ✓ Identification of Head of Household and Spouse ✓ No. of Occupants ✓ Disability Information ✓ Education ✓ Employment ✓ Income and Expenditure ✓ Housing and Living Conditions ✓ Micro-Enterprise Activities ✓ Health Issues and the environment The data collected is thereafter analysed in order to determine how to effectively approach early intervention to reduce challenges encountered and to address the needs of the community as a whole. Additionally, the Agency also engages in Title Searches where necessary to facilitate its work. However, this can be a lengthy exercise often taking approximately two (2) months. It should be noted that while the Agency has collaborated with the CSO, the CSO has indicated that they cannot divulge data in respect of individual occupants and lots. To reiterate, the mandate and powers of the LSA is derived from and outlined in the State Land (Regularisation of Tenure) Act Chapter 57:05, Act No. 25 of 1998. The Act does not provide the LSA with powers of eviction to remove squatters. However, the LSA continues to actively patrol and monitor sites and illegal

Issues and Recommendations	Recommendations of the Public Accounts Committee	Actions
		structures identified are referred to the COSL and Municipal Corporations on a weekly basis.
5. Infrastructure Development Constraints	• Request support from the Trinidad and Tobago Police Service for instances where disputes arising from squatters refusing to relocate fences and other property effective immediately; and • The MHUD should show zero tolerance for squatting in remote areas of State forest lands, forest reserves and other protected areas designated under the	**The recommendations of the Committee are noted.** There is a level of collaboration between the Trinidad and Tobago Police Service (TTPS) and LSA, however, the LSA must liaise through the COSL before seeking assistance directly through the TTPS. The LSA has no authority to remove fences / structures that are in the way of Infrastructure Development. This authority lies with the COSL in accordance with the State Land (Regularisation of Tenure) Act No. 25 of 1998. In the past the LSA had sought the assistance of the TTPS and the Trinidad and Tobago Defence Force to supply containment activities. However, at this time all support is sought through the Office of the COSL. This creates an administrative hurdle and delays the process for removing illegal structures and fences which contributes to new squatting and to the cost of development. **Zero tolerance for Squatting in remote areas of State Forest lands, Forest Reserves and other Protected Areas**

Issues and Recommendations	Recommendations of the Public Accounts Committee	Actions
	National Forest and Protected Areas Policy for Trinidad and Tobago 2011.	The cooperation of the relevant Agencies who have the power in law to protect these areas is sought and required. These include the COSL, Forestry Division, Town and Country Planning Division, the Environmental Management Division and the Regional Corporations.
6. Absence of Procurement Unit and Strategies	• LSA should take the requisite steps to establish a functional Procurement Unit by February 28, 2018 in accordance with the guidelines provided by the Ministry of Finance, consistent with the new Procurement Legislation. • LSA should submit a Report to the Parliament on the status of the initiatives being undertaken to acquire the requisite procurement staff and establishment of the procurement unit by February 28, 2018.	**The recommendations of the Committee are noted.** The LSA is committed to upholding the provisions of the Public Procurement and Disposal of Public Property Act 1 of 2015. Please note that the organisational structure of the LSA has provision for one (1) Procurement Specialist position. However, Cabinet approval is required to fill this position on contract. We have written to our Permanent Secretary requesting the Renewal of Employment Contracts for persons in the LSA, the Procurement Specialist being one of these, and now await Cabinet's decision on this matter. Other supplemental staff would be hired as the need arises. It is to be noted that it is difficult to attract a suitable candidate on a temporary arrangement as opposed to a fixed term employment contract.
7. Absence of Internal Audit Unit	• LSA should establish proper Internal Audit Unit by February 28, 2018;	**The recommendations of the Committee are noted.** The Audit Staff/ Personnel from the MHUD continues to perform Internal Audit services for the LSA. Please note that the organisational structure of the LSA has provision for two (2) audit positions i.e. (1) position of Internal

Issues and Recommendations	Recommendations of the Public Accounts Committee	Actions
	• LSA should take urgent steps to implement an effective Internal Audit function by February 28, 2018, • LSA should submit a report to the Parliament on the status of the initiatives being undertaken to acquire the requisite internal audit staff and establishment of the internal audit unit and function by February 28, 2018.	Auditor and one (1) Audit Assistant. These positions were advertised on March 9th and 12th 2017 in the Daily Newspapers and subsequently interviews were held on June 29, 2017, however the LSA did not find suitable candidates. Furthermore the LSA received a reduced budget for financial year 2017/2018 and we are presently short of funds for recruitment of new contract staff. The LSA has requested the continuation of these audit services by our Ministry's Audit Staff to assist in defraying expenses.
8. Absence of an effective system for Debt Collection	• The MHUD in collaboration with the LSA should take the requisite step to ensure the Pricing Policy is approved and implemented and submit a status report to Parliament on the progress made in the implementation of this Policy by February 28, 2018	**The recommendations of the Committee are noted.** By Minute # 1487 of August 17, 2017, Cabinet agreed: a) to a revised Pricing Policy to facilitate the provision by the LSA of land tenure for Certificate of Comfort recipients as summarised hereunder: i. The price of lots developed by the LSA, which are to be sold as 199-year leasehold titles to COC recipients, be based on 25% of the market value, that market value to be determined by the Commissioner of Valuations (COV); ii. The leasehold price, referred to at b(i) above, to conform to the defined cost components of the lease consideration as provided in the State Land (Regularisation of Tenure) Act, Chap. 57:05;

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		iii. The infrastructure development cost be absorbed by the Government of Trinidad and Tobago and the Leasehold Price will represent the premium (raw land cost) only; iv. The premium (raw land cost) will be equal to 25% of the market value as determined by the COV; v. The recipient to pay an Annual Rent Reserve which is usually a nominal payment set at $10.00 per year; vi. Other costs payable by the recipient will include Cadastral Survey costs and all other fees and stamp duty in respect of preparation and registration of the Deed of Lease. b) that in accordance with Section 15 (2) of the State Land (Regularisation of Tenure) Act, Chap. 57:05, the Minister of Housing and Urban Development will prescribe, by Order, the premium (raw land cost) to be paid by the recipient for the land, in consideration of the grant of a Deed of Lease; and c) that the Attorney General cause to be prepared the Order referred at (c) above. The above paves the way for the LSA to begin collection of money for lands developed under the Squatter Regularisation Programme.
9. Absence of a Whistleblowing Policy	• LSA should develop a policy document on whistle blowing within the shortest possible time frame to ensure that staff appreciates the ethical environment of honesty, integrity, ethics and fair play; and	**The recommendations of the Committee are noted.** The LSA seeks to conduct itself honestly and maintains compliance with the procedures and Law at all times. The LSA believes that good communication amongst the Land Settlement Committee (the Board), members of staff and clients (serviced by

Issues and Recommendations	Recommendations of the Public Accounts Committee	Actions
	• LSA should submit a report to the Parliament on the status of the initiatives being undertaken to develop and implement a whistleblowing policy by February 28, 2018	the LSA) creates a better working environment and that it is in the best interest of all for the LSA to adopt and enforce a Whistleblowing Policy. This Policy will take effect on January 2nd 2018 and will be amended and updated from time to time as determined by the Board of the LSA in accordance with the Trinidad and Tobago Whistle-blower Protection Bill No. 15 of 2015 which is before the Parliament. Please see copy of the LSA's Whistleblowing Policy attached as ***Appendix 2.***

APPENDIX 2

LAND SETTLEMENT AGENCY

Ministry of Housing and Urban Development

Land Settlement Agency

Whistle-blower Policy

January 2, 2018

Orange Grove Road South
Orange Grove Estate
Tacarigua
Email: info@lsa.gov.tt
Website: http://www.housing.gov.tt/lsa.html
Phone: 299-0795
Fax: 640-9574

Contents

The Land Settlement Agency (LSA)

The Land Settlement Agency (LSA) was established under section 5 of the State Land (Regularisation of Tenure) Act No. 25 of 1998 and began operations around the month of June 1999. Under the Act the LSA was charged with *inter alia* the following responsibilities:

- Processing applications for Certificates of Comfort (hereinafter referred to as "COCs") made by squatters as the first step toward legally regularizing their status and acquiring a lease for State land being the third step to legal regularization.
- Conducting development work on squatter sites such as the construction of roads and laying of sewer lines.
- Processing applications for leases by tenants of State land.

The LSA is dedicated to and believes that good communication amongst its Land Settlement Committee (the Board), members of staff and clients (i.e. serviced by the LSA and who provides service to the LSA) promotes better work practice and that it is in the interest of all for the LSA to adopt and enforce a Whistleblowing Policy. This Policy will take effect on January 2, 2018 and will be amended and updated from time to time as determined by the Board of the LSA in accordance with the Trinidad and Tobago Whistle-blower Protection Bill No. 15 of 2015 which is before the Parliament.

Introduction to the LSA Whistleblowing Policy

The LSA is Government Agency and is required to serve the Public. We are also responsible for servicing 20% of the Trinidad & Tobago's population by providing legal framework for land ownership and infrastructure upgrade on its Sites as outlined in our governing legislation the State Land (Regularisation of Tenure) Act No. 25 of 1998. The LSA's entire clientele is approximately 23,000 files or more.

The LSA seeks to conduct itself honestly and with integrity at all times. However, we acknowledge that all organisations face the risk of their activities going wrong from time to time, or of unknowingly harbouring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them. On this basis, all employees and clients (being who the Agency services and services outsourced by the Agency) are encouraged to raise genuine concerns about malpractice in the workplace and Agency sites without fear of reprisals and LSA will take all reasonable steps in order to protect such members, staff and volunteers from victimization and/or dismissal if they raise concerns in good faith.

1. Authority for Whistleblowing Policy

Overall authority for this policy sits with the Land Settlement Committee and the Chief Executive Officer (CEO) who is the sole Accounting Officer for the Agency. The LSA is dedicated to facilitate the operation of this policy and to ensure that stakeholders feel able to raise concerns, without fear of reprisals, in accordance with the procedure outlined below. All members of staff of the Agency's and its clients are responsible for the success of this policy and should ensure that they take steps to disclose any wrongdoing or malpractice of which they become aware.

2. Scope

This policy applies to all LSA Land Settlement Committee members and employees and clients. The Agency has introduced these procedures to enable members, employees and volunteers to raise or disclose concerns about malpractice affecting the LSA's activities at an early stage and in the right way, and they apply in all cases where there are genuine concerns, regardless of where this may be and whether the information involved is confidential or not.

The term 'malpractice' includes but is not exhaustive of:

1. Criminal Offences
2. Breaches of legal obligations (including negligence, breach of contract, breach of administrative law and/or regulations);
3. Breakdowns of justice;
4. Health and safety violations;
5. Damage to the environment;
6. Any fraudulent activity, acceptance of gifts and misuse of Agency information
7. The concealment of any of the above.

If an individual raises a genuine concern and is acting in good faith, even if it is later discovered that they are mistaken, under this policy they will not be at risk (if they are an employee) of losing their job or suffering any form of retribution (if they are a member or volunteer) as a result. This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice.

3. Procedure for Raising a Concern

If you believe that the actions of anyone (or a group of people) working for or volunteering for or on behalf of the LSA do or could constitute malpractice you should raise the matter with either the Chairman or the CEO of the LSA. Where this is not appropriate because either the Chairman or the CEO may be involved in the alleged malpractice in some way, the matter should be raised directly with the Line Minister and Permanent Secretary of the LSA's Line Ministry.

You may raise your concern verbally or in writing and should include full details and, if possible, supporting evidence of the alleged malpractice. You must state that you are acting in accordance with the LSA Whistleblowing Policy and specify whether you wish your identity to be kept confidential.

4. Confidentiality

Every effort will be made to keep a person's identity confidential, at least until any formal investigation is under way. In order not to jeopardise the investigation into the alleged malpractice, you will also be expected to keep the fact that you have raised a concern, the nature of the concern and the identity of those involved confidential.

There may be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity. This may occur in connection with associated disciplinary or legal investigations or proceedings. If in the Agency's view such circumstances exist, we will make efforts to inform you that your identity is likely to be disclosed. If it is necessary for you to participate in an investigation, the fact that you made the original disclosure will, so far as is reasonably practicable, be kept confidential and all reasonable steps will be taken to protect you from any victimisation or detriment as a result of having made a disclosure. It is possible, however, that your role as the whistle-blower could still become apparent to third parties during the course of an investigation.

Equally, should an investigation lead to a criminal prosecution or other, it may become necessary for you to provide evidence or be interviewed by the Police. In these circumstances, again, the implications for confidentiality will be discussed with you.

5. Anonymous Reporting

Anonymous disclosures and reports may be difficult and conflicting to act upon as there may be little or no corroborated evidence to substantiate the allegations. Proper investigation may prove impossible if the investigator cannot obtain further information from you, give you feed back or ascertain whether your disclosure was made in good faith. The LSA does not encourage anonymous reporting as it feels it is more appropriate and genuine for individuals to come forward with their concerns.

6. Support for Whistle-blowers

Once a disclosure is made, senior management will be allocated as your key contact to keep you up to date with the matter and provide any specific support that you may need.

No employee or client who raises genuinely held concerns in good faith under this procedure will be dismissed or subjected to any detriment as a result of such action, even if the concerns turn out to be unfounded. Detriment includes unwarranted disciplinary action and victimisation. If you believe that you are being subjected to a detriment as a result of raising concerns under this procedure, you should inform the Chief Executive Officer immediately. Any employee of the LSA who victimises or retaliates against those who have raised concerns under this policy will be subject to disciplinary action.

7. How a disclosure will be handled

All disclosures will be taken seriously and the following procedure will be used:

(a) If you have any personal interest in the matter you have raised you must disclose this at the outset. [*This procedure is not intended to replace the internal LSA Human Resource Policy Procedure, which continues to be the appropriate way to raise personal issues relating to an LSA employee's specific job or employment*].

(b) Your disclosure under this policy will be acknowledged in writing confirming that the matter will be investigated and that LSA will get back to you in due course.

(c) A suitable person will be identified to manage the disclosure. This will be someone who is in a position to take any necessary action as an outcome.

(d) A suitable individual / Committee (Chairperson) will be instructed to conduct an investigation into the allegation (they will have had no previous involvement in the matter). We aim to start the investigation within two (2) weeks of the disclosure. The length and scope of the investigation will depend on the subject matter of the disclosure. In most instances, there will be an initial assessment of the disclosure to determine whether there are grounds for a more detailed investigation to take place or whether the disclosure is, for example, based on erroneous information.

(e) You may be asked to provide more information during the course of the investigation.

(f) The investigation report will be reviewed by the person / Committee Chairperson managing the disclosure.

(g) Appropriate action will be taken – this could involve initiating a disciplinary process, or informing external authorities if a criminal action has been committed e.g. fraud or theft. We will endeavour to inform you if a referral to an external authority (e.g. fraud squad) is about to or has taken place, although we may need to make such a referral without your knowledge or consent if we consider it appropriate.

(h) If it is found that there is not sufficient evidence of malpractice, or the actions of the individual(s) are not serious enough to warrant disciplinary action, it may be more appropriate for the manager to take a more informal approach to dealing with the matter.

(i) You will receive written notification of the outcome of the investigation, though not all the details or a copy of the report.

(j) Possible outcomes of the investigation could be that:
- the allegation could not be substantiated; or
- action has been taken to ensure that the problem does not arise again.
  You will not, however, be given details about the action taken as this could breach the human rights of the person(s) involved.

(k) If you are not satisfied with the response you have received you should raise the matter with the Permanent Secretary of the Line Ministry outlining your reasons.

(l) If you have asked to remain anonymous, care will be taken to respect this request (see section on confidentiality above).

8. Corrective Action and Compliance

As part of the investigation into disclosures made under this policy, recommendations for change will be invited from the investigator to enable LSA to minimise the risk of the recurrence of any malpractice or impropriety which has been uncovered. The CEO of the LSA will be responsible for reviewing and implementing these recommendations in the future and for reporting on any changes required to the Land Settlement Agency.

9. False Disclosures

The LSA will treat all disclosures of malpractice seriously and protect staff who raise concerns in good faith. However, appropriate disciplinary action will be taken against any member, employee or volunteer who is found to have made a disclosure maliciously that they know to be untrue, or without reasonable grounds for believing that the information supplied was accurate. This may result in dismissal (in the case of employees) and termination of services (in the case of clients who provides a service).

Policy Issued & approved: January 2, 2018

	Project	Consultant	Contractor	Commencement Date	Contract Duration		% Completed by Works	Lots	Cost	Cost/lot	Area (Ha)	Co
					Days	Months						
	LAND FOR THE LANDLESS - RESIDENTIAL LOTS PROGRAMME											
1	Corinth A	Alpha Engineering	Ashana	41827	182	0	95%	63	5718190.5	90,764.93	5.7671	991
2	Corinth B	"	Sawh's	14/07/2014	182	0	97%	81	8251767.563	101,873.67	8.27	997
3	Corinth C	"	Kall Co	14/07/2014	182	0	97%	100	7634628.968	76,346.29	9.157	833
4	Glenroy II	Trintoplan	Sawh's	29/09/2014	0	9	35%	167	17498078.3	104,778.91	12.7016	1377
5	Factory Road DP	APR	D.Mahadeo	14/11/2014	0	3	100%	drainage works only	2711261.025	0.00	0	
6	Beaucarro - Filling & Drains	Alpha Engineering	LRS	19/01/2015	150	0	98%	drainage works only	6142500	0.00	0	
	AVERAGE									**93,440.95**		
	SQUATTER REGULARIZATION PROGRAMME											
1	La Savanne	Trintoplan	Namalco	42157	0	12	97%	111	13325449.68	120,049.10	11.317	1177
2	Gomez Trace	TER	GEML	42158	168	0	97%	133	14168478.65	106,529.91	22.25	636,
3	Kangalee Village	Trintoplan	SIS	42249	0	12	95%	98	13552032.43	138,286.05	12	1129
4	Bangladesh 1	VIKAB	Millennium Holdings	20/2/2015	60	0	100%	drainage works only	3278099.9	0.00	0	
5	Bangladesh 2	"	RJB	14/2/2015	60	0	100%	drainage works only	1587096	0.00	0	
4	Sunrees Road & Ramlal Street	Planviron	KJS	42009	270	0	89%	76	14116960.07	185,749.47	5.1	2768
5	Preau Village	TER	PR Contracting	23/09/2015	168	0	95%	187	19206181.91	102,706.86	20.64	930,
6	Weston	TER	Millennium Holdings	42223	84		95%	34	2101470.84	61,807.97	6.1	344,
7	Arena A	Alpha Engineering			240		*0%*	102	0	0.00	10.4	
7	Arena B	"	Kall Co	13/07/2015	180		95%	91	10201882.24	112,108.60	9.78	1043
8	Arena C	"	R. Mahabir & Sons	15/05/2015	180		97%	92	8043801.143	87,432.62	8.81	913,
9	Nurse Trace	Trintoplan	RJB Contractors Ltd	42130		12	95%	64	10057303.06	157,145.36	6.6	1523
	AVERAGE									**119,090.66**		