



FCC

FINANCIAL CRIMES
COMMISSION
MAURITIUS

EXECUTIVE SUMMARY

FINANCIAL CRIMES PREVENTION REVIEW ON THE SYSTEMS AND PROCEDURES PERTAINING TO FUNDS DISBURSEMENT FOR PROJECTS AT THE MUNICIPAL COUNCIL OF QUATRE BORNES

October 2026

1.0 Introduction

The Financial Crimes Commission (FCC), through its Education and Preventive Division, conducted a Financial Crimes Prevention Review (FCPR) of the systems and procedures pertaining to funds disbursement for projects at the Municipal Council of Quatre Bornes (MCQB), pursuant to Section 6(2)(j) of the FCC Act 2023 (FCCA 2023). This provision empowers the FCC to examine the practices of public bodies with a view to detecting and preventing financial crimes, including corruption, fraud, abuse of office, bribery and the misappropriation of public funds.

Disbursement of public funds for infrastructural and developmental projects is inherently susceptible to financial crime risks, particularly where systems and procedures are not underpinned by adequate controls, transparency and oversight.

2.0 Overview of the Review

The FCPR assessed the legal, regulatory, administrative, and operational framework governing funds disbursement for projects at the MCQB, including the roles of the Ministry of Local Government (MLG) and the Ministry of Finance (MOF). The review focused on governance and oversight structures, operational procedures for certification and payment of works, compliance with the Public Procurement Act 2006 and related Procurement Policy Office (PPO) Directives, and the digital systems supporting project and financial administration. These digital systems comprise the Council Project Management system (CPM), used to plan, coordinate and monitor projects; the EBiz System, the Council's accounting and payment-processing platform; and the E-Local Government Platform, used for project oversight and to manage public complaints.

The review was conducted through an examination of complaints and information received by the FCC, a review of files and operational documents, meetings and interviews with management and operational staff of the MCQB, MLG and MOF, and an assessment of existing systems and practices.

3.0 Key Findings

The review observed the following gaps:

1. **Payment timeliness:** the 28-day rule under PPO Directive No. 48 is routinely missed;
2. **Contractor claims submission:** claims are not consistently submitted in line with PPO Directive No. 63;
3. **Inter-agency accountability:** no contractual hold on the Land Drainage Authority (LDA) for projects it refers to the MCQB;
4. **Organisational structure:** a long-vacant Civil Engineer post concentrating technical sign-off within the Public Infrastructure Department (PID);
5. **Segregation of duties:** the Head of the PID currently absorbs the vacant Civil Engineer's responsibilities;

6. **Conflict-of-interest oversight:** disclosures are recorded but not formally reviewed;
7. **Digital systems:** CPM data hosted abroad, with unrestricted access and manual, error-prone migration to EBiz, absence of a Standard Operating Procedure Manual for CPM; and inadequate protection of confidential procurement information, including Bid Evaluation Reports accessible to staff unconnected to the relevant procurement exercise.

Collectively, these gaps may give rise to risks of abuse of office, bribery, collusion and diversion of public funds. The recommendations set out below seek to address these vulnerabilities.

4.0 Key Recommendations

The FCC has formulated the following recommendations, aimed at strengthening the governance and control framework for funds disbursement at the MCQB.

- **Comply with PPO Directive No. 48** – defined payment procedures, automated 28-day tracking with overdue flags and escalation, dedicated processing resources, and coordination with the MLG and MOF on fund availability.
- **Formalise the LDA relationship** – a written agreement on roles and timelines, a standard framework for managing clearance-driven payment delays, and staged certification linked to verified milestones.
- **Comply with PPO Directive No. 63** – a claims-submission mechanism written into contracts, digital tracking of overdue submissions, and reminders or penalties for non-compliant contractors.
- **Fill the Civil Engineer vacancy** – to restore the technical layer of accountability currently absorbed by the Head of the Public Infrastructure Department.
- **Rebuild segregation of duties** – separate approval, verification and payment functions; rotate officers; require dual approval on high-value transactions; interim independent review pending recruitment.
- **Enhance conflict-of-interest declarations** – a formal review step by senior officers, with mitigation actions documented and tracked, not just recorded in a register.
- **Move CPM hosting onto the Government Online Centre (GOC)** – local data residency, centralised cybersecurity, high-availability hosting, and disaster recovery, replacing the current offshore cloud arrangement.
- **Write the CPM procedure manual** – step-by-step guidance for every phase of digitalisation, clear roles, and defined criteria for testing, validation and change control.
- **Lock down access and confidential data** – only concerned staff reach relevant files, plus real-time logging and alerting to flag suspicious access patterns.
- **Harmonise CPM and EBiz** – secure, real-time data transfer between the two systems, upgraded payment processing in CPM, and a supplier self-service portal for payment status.

Recommendations are intended to address the loopholes identified and reduce opportunities for financial crimes in the systems and procedures governing funds disbursement for projects.

5.0 Conclusion

The FCPR conducted at the MCQB identified several weaknesses within the current system governing funds disbursement for projects, which, if left unaddressed, may facilitate financial crimes and regulatory abuses, including abuse of office, bribery, collusion, misappropriation of public funds and fraud.

The measures proposed in the FCPR Report aim to strengthen the governance framework for funds disbursement, reinforce operational controls through greater transparency, accountability and traceability, and eliminate opportunities for financial crimes by addressing the identified loopholes. The timely implementation of these measures will support national efforts to combat financial crimes, enhance regulatory oversight, and strengthen public trust and confidence in the administration of public funds for municipal infrastructure projects in Mauritius.