

Early Detection and Exclusion System

Objective

To identify, evaluate and host information on restrictive parties (service, tangibles suppliers, consultants) with the sole interest of protecting the financial and legal interest of the Agency.

Scope

The system details the process of restriction, provides tools used to analyse clients, identifies the parameters surrounding exclusion of funding, the duration of prohibition, review and update cycles, and remedial measures which can be taken.

Responsibility

All staff.

General

The Early Detection and Exclusion System utilises the following tools:

- The Blacklist Report
- International Credit Review Agency (Refinitiv via Thomson Reuters)
- Checklist

Tools in the Early Detection and Exclusion System

1. The Blacklist Report

The blacklist report ensures that persons conducting business with the Agency is not in violation of the conditions under which grounds for exclusion can be determined based on the Agency's exclusion criteria.

Framework of Blacklist Report

This criterion is considered when determining whether a firm/company/individual is identified and placed on the blacklist. The blacklist must be consulted by all staff to ensure that any contractor/company under evaluation is not in violation with the Agency's exclusion criteria listed as mentioned in "General Rules Relating to the Procurement of Services and Tangibles"

2. International Credit Review Agency (Refinitiv via Thomson Reuters)

Refinitiv is one of the largest providers of financial market data, analytics and tools which assist businesses in making decisions. Supported by information from Thomson Reuters, this online tool allows the Agency to conduct due diligence checks on clients, third-party contractors, and grant beneficiaries based upon areas defined in the Agency's exclusion criteria.

3. Checklist

A guidelist of points and questions to guide staff when using the Early Detection and Exclusion System. The checklist also acts as a record of investigation of companies/individuals who wish to provide services or tangibles to Caribbean Export. This checklist is reviewed and approved by department managers. See section on Forms.

Procedures on the use of the Early Detection and Exclusion System

Companies undergoing the Agency's procurement process, must be assessed via the Early Detection and Exclusion System.

Tenders Bids are evaluated using the Open Tender Procedures.

When engaging in the procurement of goods, services or issuing a call for proposals of grant funding, all staff of the Agency must consult the system, initiate a credit check report on shortlisted applicants and utilize the checklist to determine appropriate action to be taken. This must be done prior to contracting.

Assessment Steps	Action
<p>Review Blacklist Report to identify any prohibition.</p>	<p>Identify whether the company is listed on the Agency's Blacklist.</p> <p>If the company is identified on the Blacklist, then the applicant will be excluded from funding.</p>
<p>Conduct due diligence checks via international credit review agency (Refinitiv via Thomson Reuters) on shortlisted applicants.</p>	<p>Initiate an international due diligence check through the Refinitiv via Thomson Reuters international credit review online portal.</p> <p>If the result of this international assessment is negative or indicates grounds for exclusion exist within the context of the Agency's exclusion criteria, then the applicant will be excluded from funding.</p>
<p>Review company's website profile and identify correlations with official documents submitted. E.g. company name, address, contact details, registration, nature of business.</p>	<p>Conduct further business research to identify whether they are inconsistencies with information submitted, compared to that listed on the company's official website or the due diligence check report.</p> <p>If the result of further business research is negative or indicates grounds for exclusion exist within the context of the Agency's exclusion criteria, then the applicant will be excluded from funding.</p>

Review and Update Cycle

All staff are required to report, via the Early Detection and Exclusion Checklist, to the Advisor - Records and Information Management, any person or company which has been assessed through the system and identified to be excluded from funding. Additionally, all unfavourable final consultant evaluation forms indicating the Agency's recommendation not to rehire a consultant, must be sent to the Advisor - Records and Information Management to update the Blacklist Report.

The Blacklist Report is reviewed and updated on a quarterly basis. The report generated from the credit check, for any specific beneficiary/vendor/individual/consultant, shall be valid for a period of six (6) months. At the end of this six-month validity period, the credit report must be initiated again for any new engagements. Companies/individuals on the blacklist can lodge a request for review of their status on the report. All requests must be made in writing, supported by evidence, to the Executive Director of the Agency. All information provided and gathered by the Agency, its partners (BSO's, Chamber of commerce and CSI's) and international third-party due diligence agencies will inform the review and update of the status of the companies identified on the blacklist.

Corrective Action

Companies/contractors appearing on the Blacklist must provide legitimate proof of corrective action for assessment and consideration for removal from the list. The Agency's leadership team, in conjunction with its lawyers, will conduct an assessment of evidence provided and report the results of the decision within five (5) days of the request for review.