

By: James Flannery – Counter Fraud Manager

To: Governance and Audit Committee

Subject: **Policy Review:  
Anti-Money Laundering Policy  
Anti-Bribery Policy  
Anti-Fraud and Corruption Strategy**

Classification: Unrestricted

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### **Summary:**

This report details:

- Updates to key policies following a review against changes in legislation and guidance

**Recommendation: To agree amendments to the policies**

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### **Introduction**

- 1.1 As part of Internal Audit & Counter Fraud corporate service, a review has been conducted against key policies as part of their annual review.
- 1.2 The following provides a summary of changes to each of the policies, with the actual amended policies (with amendments highlighted in yellow) attached as appendixes:

#### **Policy**

#### **Key updates**

Anti-Money  
Laundering Policy

Changes owner from Head of Internal Audit to Corporate Director Finance  
Reduces the financial limits from €15,000 to €10,000 (HMRC are still using euro's)

Separates procedural aspects from the policy into an Annex

An update to the requirement to report linked cash payments below €10,000 when it is suspect this has been done to fall below the high value limit (€10,000)

Allows for electronic ID verification if free from fraud

Now includes a list of types of activity that may be affected – This will help Corporate Directors to understand which of their functions are at a greater risk of money laundering so they can act accordingly

Now includes a risk assessment which has been assessed as low. However, due the inherent risks of money laundering around property transfers this may need to be revised in the event there is a change in responsibility in property transfers.

Anti-Bribery Policy

Changes owner from Head of Internal Audit to General Counsel

Includes an addition to the top-level commitment to ensure relevant resources are available to manage the risk of bribery

No other significant changes to the policy however case law has tested what adequate procedures would be required to defend a case against the corporate offence of failing to prevent bribery, places greater need to ensure bribery risks have been identified and mitigated against.

Anti-Fraud & Corruption Strategy Reviewed against the Fighting Fraud & Corruption Locally – A strategy for the 2020's this has seen the following key additions to this strategy:

Updates on the estimated fraud losses within Local Government

Requirement for those charged with governance to ensure there are robust and holistic measures on anti-fraud, bribery and corruption. This has seen additional requirements placed on the roles and responsibilities for Senior Stakeholders.

The need for management to assess the risk of fraud and consult with Counter Fraud Specialists on new policies, strategies and initiatives.

Add Data Protection Policy and Financial Regulations to linked policies.

## **Recommendations**

1.3 To agree the updates to the policies.

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