

By: James Flannery – Counter Fraud Manager  
To: Governance and Audit Committee – 25<sup>th</sup> January 2022  
Subject: **Policy Review:  
Anti-Money Laundering Policy  
Anti-Bribery Policy  
Anti-Fraud and Corruption Strategy  
Whistleblowing Policy – Internal & External**  
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 prior to submission to the Governance and Audit Committee for approval**

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**Introduction**

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

<b>Policy</b>	<b>Key updates</b>
Anti-Money Laundering Policy <b>Appendix 1</b>	<p>No changes in legislation or guidance have been identified as part of this policy review.</p> <p>The assessed risk is still low due to the low amount of cash Kent County Council receives that are from known cash income sources and low volumes and low amounts of refunds being made.</p> <p>Therefore, no changes are required, it is recommended this policy is reviewed every two years or when there is a relevant change in legislation/ guidance whichever is sooner.</p>
Anti-Bribery Policy <b>Appendix 2</b>	<p>No changes in legislation or guidance have been identified as part of this policy review.</p> <p>Therefore, no changes are required, it is recommended this policy is reviewed every two years or when there is a relevant change in legislation/ guidance whichever is sooner.</p>
Anti-Fraud & Corruption Strategy <b>Appendix 3</b>	<p>Updated to refer to the KCC Prosecution and Sanction Policy.</p> <p>Updated to refer to the External Whistleblowing Policy</p> <p>It is recommended the strategy is reviewed every two years or when there is a relevant change in legislation/ guidance whichever is sooner.</p>

Whistleblowing  
Policy - Internal  
and External  
Whistleblowing  
Internal procedure  
**Appendix 4, 5 & 6.**

Internal Policy and Procedure - Updates in named contacts and minor terminology changes

External policy – Introduces a policy to manage concerns being raised by those not directly employed by KCC but may be exposed to wrongdoing.

Front page is in easy read format so members of the public can access the key information easily without reading the whole policy.

Once adopted, will review initially after a year for two years to monitor how the policy is being delivered, thereafter every two years.

## **Recommendations**

- 1.3 To agree the updates to the policies, providing any comments or amendments prior to submission to January 2022 Governance and Audit Committee.

**James Flannery, Counter Fraud Manager**

03000 416092, [james.flannery@kent.gov.uk](mailto:james.flannery@kent.gov.uk)

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