By:	James Flannery – Interim Head of Counter Fraud
To:	Governance and Audit Committee – 23rd July 2026
Subject:	**Policy Review:** **Anti-Money Laundering Policy** **Anti-Bribery Policy** **Anti-Fraud and Corruption Strategy**
Classification:	Unrestricted

Summary:

This report details:

- Updates to key policies following a review against changes in legislation, guidance and best practice.

Recommendation: To note the amendments to the policies following approval at Corporate Management Team.

Introduction

1.1 As part of the Internal Audit and Counter Fraud corporate service, a review has been conducted of key policies as part of their biennial review.

1.2 The following provides a summary of changes to each of the policies, with the amended policies attached as appendices:

Policy	Key updates
Anti-Money Laundering Policy **Appendix 1**	Change of policy owner and Money Laundering Responsible Officer (MLRO) to the new Corporate Director of Finance and Section 151 Officer. Adding the Monitoring Officer to those who need to be informed of suspicious transactions in the absence of the MLRO.
Anti-Bribery Policy **Appendix 2**	Change of policy owner to the new Monitoring Officer. Enhancements to include Monitoring Officer engagement with Kent Police, where appropriate. Enhancements within the top-level commitment to promoting integrity through the promotion and monitoring of declarations of interest and the refusal of gifts and hospitality. Updates to reference the new procurement legislation.
Anti-Fraud & Corruption Strategy **Appendix 3**	Change of policy owner to the Interim Head of Counter Fraud. Additional risk added to the strategy covering contract fraud.