

REPORT OF AUDIT COMMITTEE

(Meeting held on 29 October 2021)

1. REVIEW OF: ANTI-FRAUD, BRIBERY & CORRUPTION STRATEGY, WHISTELBLOWING POLICY AND ANTI-MONEY LAUNDERING POLICY

The Committee have considered and recommend for approval the updated Anti-Fraud Bribery and Corruption Strategy, the Whistleblowing Policy, and the Anti-Money Laundering Policy.

These three documents were approved in 2018, and it is good practice to review them every three years.

The policies have duly been reviewed and are still considered fit for purpose, with only limited updates required in terms of minor amendments, e.g. definitions and simplified wording.

The revised policies are as follows:

Anti-Fraud, Bribery and Corruption Strategy

As it states in the Policy, 'The Council is committed to the fight against fraud, bribery and corruption and will not tolerate these acts in the administration of its responsibilities, whether from inside or outside the Council. It will deal openly and forcefully with anyone who acts dishonestly'

To help local government recognise and address their fraud risks, the Chartered Institute of Public Finance & Accountancy (CIPFA) produced "Fighting Fraud & Corruption Locally -The Local Government Counter Fraud and Corruption Strategy 2016-2019" and a "Code of Practice on Managing the Risk of Fraud and Corruption". This strategy has been constructed utilising this central guidance.

Whistleblowing Policy

The policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Protect. It does not form part of any employee's contract of employment and may be amended at any time.

The aims of this policy are:

- (a) To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- (b) To provide staff with guidance as to how to raise those concerns.
- (c) To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken and they will not be subject to any detriment, e.g. dismissed, denied promotion, ostracised or transferred to another department.

Anti-Money Laundering Policy

This Policy applies to all employees, contractors, suppliers and agency staff of the Council and aims to maintain the high standards of conduct which currently exist within the Council by preventing the Council from being exposed to criminal activity through money laundering. The Policy sets out the procedures which must be followed.

Failure by a member of staff to comply with the procedures set out in this Policy may lead to disciplinary action being taken against them. Any disciplinary action will be dealt with in accordance with the Council's Disciplinary Policy and Procedures

Legislation concerning money laundering, namely the Money Laundering, Terrorist Financing & Transfer of Funds Regulations 2017, the Proceeds of Crime Act 2002, and the Terrorism Act 2000 broadened the definition of money laundering and increased the range of activities caught by the statutory framework. As a result, the obligations impact on areas of local authority business and they require local authorities to establish internal procedures to prevent the use of their services for money laundering or terrorist financing.

RECOMMENDED:

That the updated policies (Appendices 1,2 and 3 of Report 4 of the Audit Committee agenda) be adopted to take effect from 1 April 2022.

**CLLR A O'SULLIVAN
CHAIRMAN**