

DECISION-MAKER:		GOVERNANCE COMMITTEE	
SUBJECT:		ANTI-FRAUD, BRIBERY & CORRUPTION, MONEY LAUNDERING, WHISTLEBLOWING POLICIES 2018-19	
DATE OF DECISION:		23rd APRIL 2018	
REPORT OF:		CHIEF INTERNAL AUDITOR	
<u>CONTACT DETAILS</u>			
AUTHOR:	Name:	Elizabeth Goodwin	Tel: 023 8083 4616
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Director	Name:	Mel Creighton	Tel: 023 8083 4897
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STATEMENT OF CONFIDENTIALITY			
N/A			
BRIEF SUMMARY			
<p>The following policies;</p> <ul style="list-style-type: none"> • Anti-Fraud & Corruption • Bribery Act • Anti-Money Laundering • Duty To Act Whistleblowing <p>have all been reviewed to enable any changes in relevant legislation to be considered for incorporation along with any amended recommended areas of best practice.</p> <p>For information the Money Laundering Regulations 2007 have been replaced with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulation 2017. This legislation places greater emphasis on risk assessments in relation to understanding areas of potential exposure and enhanced internal controls.</p> <p>The previous Bribery Act policy and Anti-Fraud & Corruption policy have been amalgamated as the offences are interlinked and sit better considered together.</p>			
RECOMMENDATIONS:			
	(i)	That the Governance Committee approves the reviewed Anti-Fraud, Bribery & Corruption Policy, the Anti-Money Laundering Policy and the Whistleblowing (Duty to Act) Policy as attached appendix 1, 2 & 3.	
REASONS FOR REPORT RECOMMENDATIONS			
1.	<p>To maintain compliance with the relevant legislative requirements including:</p> <ul style="list-style-type: none"> • Fraud Act 2006 • Bribery Act 2010 • Money Laundering, Terrorist Financing and Transfer of Funds Regulation 2017 • Public Interest Disclosure Act 1998 		
ALTERNATIVE OPTIONS CONSIDERED AND REJECTED			
2.	None		

DETAIL (Including consultation carried out)	
3.	The revised policies have all been reviewed by the Service Director for Legal & Governance to ensure that they are compliant with any legislative requirements.
RESOURCE IMPLICATIONS	
<u>Capital/Revenue</u>	
4.	None
<u>Property/Other</u>	
5.	None
LEGAL IMPLICATIONS	
<u>Statutory power to undertake proposals in the report:</u>	
6.	<ul style="list-style-type: none"> • Fraud Act 2006 • Bribery Act 2010 • Money Laundering, Terrorist Financing and Transfer of Funds Regulation 2017 • Public Interest Disclosure Act 1998
<u>Other Legal Implications:</u>	
7.	None
RISK MANAGEMENT IMPLICATIONS	
8.	Non-compliance with legislation.
POLICY FRAMEWORK IMPLICATIONS	
9.	None
KEY DECISION?	No
WARDS/COMMUNITIES AFFECTED:	None
<u>SUPPORTING DOCUMENTATION</u>	
Appendices	
1.	Anti-Fraud, Bribery and Corruption Policy
2.	Anti-Money Laundering Policy
3.	Whistleblowing (Duty to Act) Policy
Documents In Members' Rooms	
1.	None
Equality Impact Assessment	
Do the implications/subject of the report require an Equality and Safety Impact Assessment (ESIA) to be carried out.	No
Data Protection Impact Assessment	
Do the implications/subject of the report require a Data Protection Impact Assessment (DPIA) to be carried out.	No

Other Background Documents

Other Background documents available for inspection at Internal Audit Office, Civic Centre, Municipal, 1st floor, Rm 219.

Title of Background Paper(s):

None

Relevant Paragraph of the Access to Information Procedure Rules / Schedule 12A allowing document to be Exempt/Confidential (if applicable)