

REVIEW OF THE WHISTLEBLOWING POLICY, THE ANTI-FRAUD POLICY AND THE ANTI-MONEY LAUNDERING POLICY

Responsible Cabinet member: Councillor Middleton (Cabinet member for Resources and Commercialism)

Author and contact: Duncan Wilkinson (Assistant Director - Audit and Risk)
Tel: 01908 252089

Executive Summary:

Governance policies are reviewed annually to ensure they maintain applicability and reflect best practice. Anti-Fraud policies have been reviewed with minimal changes needed as set out in the report below. The proposed Policies have been reviewed by Audit Committee.

1. Recommendation(s)

That the Whistleblowing Policy, the Anti-Fraud Policy and the Anti-money Laundering Policy be agreed.

2. Issues

2.1 The three policies are:

- (a) Anti-Fraud and Corruption Policy (Annex A)
- (b) Anti-Money Laundering Policy (Annex B)
- (c) Whistleblowing Policy (Annex C)

2.2 There are only minor changes needed to the Anti-Fraud and Corruption Policy to reflect:

- A change in the Internal Audit and Corporate Anti-Fraud Team roles narrative since the unification of these services.
- Removal of reference to the Corporate Anti-Fraud Team at paragraph 3.2.

2.3 There are only minor changes needed to the Anti-Money Laundering Policy to reflect:

- A change in the contact details of the Money Laundering Reporting Officer (MLRO) at Paragraph 6.1
- Removal of various references to the "Partnership" and replaced with the "Council" where appropriate.

2.4 There are only minor changes needed to the Whistleblowing policy to reflect:

- A change in the contact details of the Head of Internal Audit on the cover page
- An addition of the word "schools" at paragraph 2.6

- A change to the contact details in paragraph 3.1.2
- The deletion of MK@Work at paragraph 8.2 since the publication has now ceased.

3. **Issues**

3.1 The Audit Committee reviewed the attached policies. Although these are policies requiring a decision by the Cabinet member the minimal changes make them suitable for delegated decision.

4. **Implications**

4.1 Policy

These documents formalise Council policy in the relevant areas and provide adherence to best practice in respect of anti-fraud, good governance and public standards.

4.2 Resources and Risk

The policies provide the framework to effectively manage the risks associated with anti-fraud issues. No direct financial / risk issues arise from the approval of the policies.

N	Capital	N	Revenue	N	Accommodation
N	IT	N	Medium Term Plan	N	Asset Management

4.3 Carbon and Energy Management

None

4.4 Legal

The policies seek to provide compliance with relevant statutory responsibilities including those relevant to Money Laundering and also the Public Interest Disclosures Act

4.5 Other Implications

None – only as included within the relevant policies.

N	Equalities/Diversity	N	Sustainability	Y	Human Rights
N	E-Government	N	Stakeholders	Y	Crime and Disorder

Annexes: Annex A - Anti-Fraud & Corruption (AF&C) Policy
 Annex B - Anti-Money Laundering (AML) Policy
 Annex C - Whistleblowing Policy