

Employment Matters Committee

3 December 2025

Speak Up, Anti-Bribery and Anti-Money Laundering and RIPA Policies: Report on Instances September 2024 – August 2025

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Summary

This report informs Members about the number and nature of concerns raised, between September 2024 and August 2025, under the Council's Speak Up (whistleblowing), Anti- Bribery, Anti-Money Laundering and use of Regulation of Investigatory Powers policies.

This report was also considered by the Audit Committee on 11 September 2025, the draft minutes of which are set out at section 8 of the report below.

1. Recommendation

- 1.1. The Committee is asked to note the comments of the Audit Committee set out at section 8 of this report.
- 1.2. The Committee is recommended to note the contents of this report.

2. Budget and policy framework

- 2.1. The Council's Speak Up Policy, Anti-Bribery Policy and Anti- Money Laundering Policy are contained within the Council's Constitution and the Regulation of Investigatory Powers policy on the intranet. These policies require annual reports on the number and nature of instances raised to be provided to the Employment Matters Committee. This report is also submitted to the Audit Committee.

3. Background

- 3.1. The Council has agreed a number of policies to tackle unlawful acts, including fraud, bribery, corruption, unethical conduct and malpractice regardless of who commits them, or where in the Council they are committed. These can be summarised as follows.

- **Speak Up (whistleblowing) policy:** This policy covers the procedure for anyone wishing to raise a concern relating to any illegal, unethical or unprofessional conduct within the Council, including malpractice and or abuse. It is designed to enable concerns to be raised without fear of reprisals or victimisation where disclosure is made in good faith.
- **Anti-bribery policy:** This policy sets out the Council's commitment to the prevention and detection of bribery and the arrangements in place to ensure compliance by Councillors and employees, including contractors, volunteers and consultants.
- **Anti-money laundering policy:** This policy sets out the Council's commitment to ensuring there are appropriate and proportionate anti-money laundering safeguards to prevent, wherever possible, the organisation and its staff being exposed to money-laundering.
- **RIPA policy:** This policy sets out how and when the Council will use covert surveillance to aid its performance of enforcement functions for the prevention and detection of criminal activity.

4. Speak Up

- 4.1. In December 2024 this Committee received its annual update. Zero concerns had been raised during the period Sept 2023 to Sept 2024 and any ongoing investigations from the previous year had all been concluded.
- 4.2. There have been 0 concerns raised under the Speak Up policy during this period.
- 4.3. For comparison purposes, the table below sets out the number of concerns raised under the Speak Up policy for the last three years:

Year	Instances
2021/22	2
2022/23	8
2023/24	0
2024/25	0

5. Anti-Bribery and Anti-Money Laundering

- 5.1. Members are advised that there were zero concerns raised under policies during this period.

6. Regulation of Investigatory Powers

- 6.1. There were zero requests to undertake covert surveillance during this period.

7. Risk management

Risk	Description	Action to avoid or mitigate risk	Risk rating
Staff, members or contractors, or the public with concerns may not know what to do.	Failing to promote the Speak Up policy	Promote awareness of the Speak Up Policy and encourage staff, members, contractors to raise concerns through the confidential process.	CII
Reputational, legal and financial	Money laundering or bribery offences are committed by members of staff or supplier or customer leading to liability for the council	The agreed Anti-Money Laundering Policy and the Bribery Policy, provide information to staff and Councillors via the internet and through training	CII
Failure to comply with the statutory whistleblowing legislation.	Concerns that are raised under the scope of the policy are not managed appropriately and the whistle-blower may not be protected as allowed for under the statutory legislation	Whistleblowing Officers have received training. All documents that refer to Whistleblowing Officers have a link directing the reader to the correct page	CII

Likelihood	Impact:
A Very likely B Likely C Unlikely D Rare	I Catastrophic II Major III Moderate IV Minor

8. Audit Committee – 11 September 2025

- 8.1. The above Committee considered this report on 11 September 2025, and the draft minutes of the discussion are set out below:
- 8.2. Discussion:
- 8.3. The Assistant Director, Legal and Governance introduced the report. He highlighted there had been no instances of concerns raised under the Speak

Up, Anti-Bribery and Anti Money Laundering, or RIPA policies during the reporting period.

- 8.4. He added that a senior leadership group of himself as Monitoring Officer, the Chief Operating Officer, Chief Organisational Culture Officer and Head of Internal Audit and Counter Fraud met on a monthly basis to triage potential concerns in relation to the Speak Up policy and request investigations under the relevant policy.
- 8.5. The following issues were discussed:
- 8.6. Speak Up concerns raised - The Committee discussed the lack of concerns raised under the Speak Up Policy; it was asked whether the policy was accessible enough to staff. The Assistant Director, Legal and Governance stated that it was difficult to answer why concerns had not been raised under the policy however, in 2022/23 there were eight concerns raised, so there was some variation in instances over the recent period.
- 8.7. Any complaint was triaged by the leadership group, and it may be investigated under a number of different policies such as Speak Up or grievance procedures. Officers did not want to exclude complaints or otherwise rule them out, rather they sought to find the right route for the complaint to be investigated.
- 8.8. The Independent Member asked whether staff were aware of the policy, the Assistant Director Legal and Governance stated that 55.5% of staff completed the recent staff survey and the number of respondents that were not aware of the policy was relatively small. He added that he believed the policy was easy enough to find on the Council's intranet even if staff did not know where the policy was, so staff were aware of the policy.
- 8.9. The Chief Operating Officer added that as part of Medway 2.0, consideration was being given to adding a chatbot to the intranet which would provide assistance to staff in finding information quickly and easily.
- 8.10. The Assistant Director, Legal and Governance informed the Committee that the numbers of grievance allegations and employee tribunals were also small which may provide additional reassurance to the Committee. As part of Annual Governance in the future, it was proposed that managers be required to confirm what policies and procedures they have shared with their team which would provide additional reassurance that staff were aware where they could report concerns.
- 8.11. Benchmarking data – it was requested that further information be provided to benchmark data against comparable unitary and other authorities in the region. The Assistant Director, Legal and Governance stated that companies deal with issues differently, so direct comparison was difficult

8.12. Decision:

The Committee noted the contents of the report.

9. Financial and legal implications

- 9.1. The Public Interest Disclosure Act 1998 protects a worker from victimisation or detriment following a disclosure made in accordance with the provisions of this Act. The Speak Up policy has been developed in line with the provisions of the Public Interest Disclosure Act 1998. A written policy is indicative of good corporate governance practice. The policy also gives the Council an opportunity to give prominence to the issues and to express its commitment to the legal protection offered to whistleblowers.
- 9.2. Local authorities are required to have a policy which details how and when covert surveillance may be undertaken and who can authorise such activity. The Council was last inspected by the Investigatory Powers Commissioners Office in January 2024, who were content with the Council's approach, a revised policy was approved by the Cabinet on 30 April 2024.
- 9.3. There are no direct financial implications arising from this report.

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Appendices

None

Background papers

None