

Audit Committee

10 September 2026

Speak Up, Anti-Bribery and Anti-Money Laundering and RIPA Policies: Report on Instances September 2025 – August 2026

Report from/Author: Bhupinder Gill, Assistant Director Legal and Governance

Summary

This report informs Members about the number and nature of concerns raised, between September 2025 and August 2026, under the Council's Speak up (whistleblowing), Anti- Bribery, Anti-Money Laundering and use of Regulation of Investigatory Powers policies.

1. Recommendation

- 1.1. Members are 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 Audit Committee. This report is also submitted to the Employment Matters 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 September 2025 the committee received its annual update. Zero concerns had been raised during the period Sept 2024 to Sept 2025 and any ongoing investigations from the previous year had all been concluded.
- 4.2. There has been one concern 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
2023/2024	0
2024/2025	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.	C2
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	C2
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	C2

8. Financial and legal implications

- 8.1. 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.
- 8.2. Local authorities are required to have 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 councils approach, a revised policy was approved by Cabinet on 30 April 2024.
- 8.3. There are no direct financial implications arising from this report.

9. Local Government Organisation.

- 9.1. Each of the constituent councils that will form the new unitary council will have their bespoke policies on whistleblowing, money laundering and anti bribery, in addition to reporting requirements.
- 9.2. Following the election of the shadow authority in May 2027, the shadow authority will need to consider developing its own policies and reporting framework. Further the shadow authority will also need to consider if it wishes to receive reports from the constituent councils in relation to the final year/ part thereof of their tenure.

Lead officer contact

Bhupinder Gill,
Assistant Director Legal and Governance
Gun Wharf,
Tel: 01634 33 21 33,
Email: bhupinder.gill@medway.gov.uk

Appendices

None

Background papers

None