

JOB PROFILE

August 2019

Job Title: **Compliance & Financial Crime Officer**
Contract: **Permanent – Part time (0.5 FTE) ***
Location: **Tonbridge**
Responsible to: **Compliance & Financial Crime Manager (Deputy Money Laundering Reporting Officer)**

Overall Purpose of the Role:

To provide support to the Compliance & Financial Crime Manager (CFCM)/ Deputy Money Laundering Reporting Officer (DMLRO) and work with other members of the Compliance Team in the development and delivery of a comprehensive risk and compliance framework that enables the Bank to meet regulatory requirements on an ongoing basis.

The role will assist in the oversight and maintenance of effective compliance arrangements (including monitoring reviews, financial promotions, regulatory change & management information (MI)), oversight of financial crime systems and controls including anti-money laundering (AML), and ensuring the appropriateness of Data Protection (DP) requirements.

Dimensions of the Role:

- No direct reports.

Key Contacts:

- Internal
 - The Board of Directors; Audit Committee (AuditCo); Risk Committee (RiskCo); Executive Committee (ExCo); Deputy Chief Executive; Compliance & Financial Crime Manager; Compliance & Financial Crime Officer (CFCO);
 - All staff.
- External
 - PRA; FCA; FSCS; FOS; BEIS; HMRC; ICO;
 - Bank of England; Companies House;
 - UK Finance and other industry bodies;
 - Auditors and legal advisors;
 - Law enforcement agencies.

Other Requirements:

- Occasional long hours

** This role is part time (0.5 FTE, 17.5 hours per week) and Charity Bank can offer a flexible working pattern with the weekly hours worked over a minimum of three days (our preference being Monday, Wednesday, Friday). We are also open to the candidate having extra flexibility during the school holidays. Please advise us of your preferred work pattern in your covering letter.*

Key Accountabilities:

Compliance

1. **Financial Crime:**
 - a. Provide support to/cover for CFCM (DMLRO) to ensure: that appropriate AML arrangements are in place and that the relevant legislation is complied with; Suspicious Activity Reports (SARs) are reviewed and investigated and, where relevant, submitted to the relevant law enforcement agency;
 - b. Undertake regular reviews to monitor the effectiveness of AML policies and procedures;
 - c. Keep up to date with sanctions, prohibitions or advisory notices.
2. **Data Protection (DP)/General Data Protection Regulation (GDPR):**
 - a. Provide support to/cover for CFCM (DMLRO) to ensure: that appropriate DP/GDPR arrangements are in place and that the relevant legislation is complied with; investigate potential DPA/GDPR breaches and liaise with ICO/report where relevant;
 - b. Undertake ad hoc reviews to monitor the effectiveness of DP/GDPR policies and procedures;
 - c. Keep up to date with sanctions, prohibitions or advisory notices.
3. **External:** Provide support to/cover for CFCM (DMLRO) by liaising with external agencies e.g. regulators or law enforcement agencies, and any other third-party enquiries in relation to money laundering/DP prevention, investigation or compliance. Promptly respond to any reasonable request for information from the regulator and/or law enforcement agencies.
4. **Minute taking:** Take concise, effective minutes of internal committee meetings.
5. **Financial Promotions/communications:** Review financial promotions/communications to ensure they meet regulatory standards; make recommendations on approvals/changes to promotions; undertake regular reviews of Self Sign-Off (SSO) financial promotions.
6. **Compliance monitoring/Conduct:** Assist in all aspects of compliance monitoring, undertaking reviews as required within the agreed framework for Treating Customers Fairly (TCF)/Conduct Risk and ensure that relevant registers are kept up to date. Provide cover for CFCO in monitoring sanction lists (HMT and OFAC) and screen against customer accounts.
7. **Compliance, Financial Crime and Data Protection reporting:** Assist with the preparation of reports and management information for Board and Committee meetings; provide reports to the CFCM (DMLRO) and senior management team on the findings of compliance, financial crime (including AML) and DP/GDPR reviews and where non-compliance with policies or regulations has been identified.
8. **Policies, Procedures and Records:** Maintain up to date and comprehensive compliance, financial crime and DP records (electronic and manual). Support the CFCM (DMLRO) in ensuring that compliance policies (including financial crime, AML, DP/GDPR, conflicts of interest etc.) and the Compliance Manual are reviewed and kept up to date and meet prevailing legal and regulatory standards.
9. **Complaints:** Provide advice, guidance and support to business areas dealing with complaints and provide support to the CFCO with maintaining the register and ensuring that timely and appropriate responses are made to complainants on behalf of Charity Bank.

10. **Regulatory change:** Monitor and keep up to date with regulatory change, activities and developments; review relevant regulatory statements/papers (to include PRA, FCA, FSCS, FOS, HMT, BEIS, ICO and other trade body activities e.g. UK Finance) and advise CFCM (DMLRO) and other relevant stakeholders of proposed/pending regulatory changes and their likely impact on the business so that Charity Bank can put appropriate processes in place to meet future regulatory requirements.
11. **Regulatory/Internal Audit relationship:** Support preparation for/delivery of regulatory and audit visits and requests for information. Support CFCM (DMLRO) in tracking any resultant action plans.
12. **Business support:** Provide advice to business areas on regulatory obligations and on the creation and implementation of regulatory compliant policies and procedures. Advise on/suggest changes to processes where there may be a changed/new conduct impact. Provide support to colleagues to prepare them when regulatory visits and inspections are due.
13. **Senior Manager and Certification Regime & Code of Conduct:** Support CFCM (DMLRO) in maintaining the responsibilities matrix and map.
14. **Training/training administration:** Support arrangements to provide staff with training (online and classroom) on Compliance, Financial Crime (including AML) and Data Protection (DP); support CFCO in monitoring completion of e-learning and maintenance of up to date training records.

General

15. Undertake general administration duties and project work as requested.
16. Contribute to the effective and efficient running of the Compliance & Financial Crime team and wider Deputy CEO team.
17. Represent the Compliance & Financial Crime team appropriately across the organisation and Charity Bank appropriately to the wider community.
18. Participate, as appropriate, in staff forums and meetings.

PERSON PROFILE

Job Title: **Compliance & Financial Crime Officer**

	Essential	Desirable
Experience	<ul style="list-style-type: none"> • At least 2 years' experience in compliance or risk functions in a retail financial services environment • Working knowledge of AML, DP, GDPR and Financial Promotions policies and procedures • Implementation of Compliance monitoring programmes • Knowledge and good understanding of PRA/FCA rules and guidance • Experience of liaising effectively with the regulator and third parties • An understanding of the key risks and controls that exist in the principal operational areas of a small financial services firm 	<ul style="list-style-type: none"> ▪ Understanding of the needs of & issues facing the third sector ▪ MLRO/Deputy MLRO experience ▪ Experience in a small bank, building society, large credit union or community bank ▪ Minute taking experience
Attainments	<ul style="list-style-type: none"> • Graduate calibre 	<ul style="list-style-type: none"> • Further industry specific qualifications
Special Aptitudes	<ul style="list-style-type: none"> • A self-starter, able to work on own initiative to deliver high quality outcomes within agreed timescales • Meticulous attention to detail; highly organised; systematic in approach • High level of common sense; sound judgement; practical and pragmatic • Able to manage competing priorities & balance stakeholder interests alongside them • Computer-literate: MS Office as a minimum • Excellent presentation and verbal and written communication skills, to be able to inform and persuade both orally and in writing and communicate effectively with a variety of audiences • Numerically competent • Ability to produce comprehensive reports • Ability to interpret legislation & regulatory literature • Negotiating and influencing skills • Persistence, an eye for detail and ability to complete projects and keep to deadlines 	
Disposition	<ul style="list-style-type: none"> • A high degree of personal integrity, trustworthiness and confidentiality • Good interpersonal skills • A strong commitment to Charity Bank's mission and values • Influencing skills – good at getting a message across • Open to challenge and willing to learn 	

Thinking Style	<ul style="list-style-type: none">• Proactive in identifying problems and presenting possible solutions• Flexible and willing to adapt to changing priorities• Process-driven, able to review and improve processes and procedures• Good at evaluating customer needs through effective questioning and quickly assimilating information from a wide range of sources• Punctual and reliable
Motivation	<ul style="list-style-type: none">• Committed to own continuing personal development
Circumstances	<ul style="list-style-type: none">• Willing to be flexible/work long hours on occasions to meet deadlines