

Role Profile

Role Details

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| Role Title | Compliance Advice and Delivery Manager |
| NS&I Pay band | 4 |
| Civil Service equivalent grade | 7 |
| Success Profiles Behaviours level | 4 |
| Business unit | Risk Directorate |
| Reporting to | Head of Compliance Advice and Delivery |
| Date produced or updated | July 2021 |

Purpose of Role

This role is responsible for the management of the Compliance team which comprises of technical roles, providing guidance to the business in respect of general law, the NS&I legislation and FCA regulations, including but not limited to:

- National Savings Regulations
- Trust law and laws relating to Powers of Attorney
- HMRC rules e.g. ISAs
- Freedom of Information Act 2000 (including HM Govt. Transparency guidance)
- Environmental Information Regulations 2004
- FCA regulations
- ASA guidelines in respect of financial promotions
- Unfair Contract Terms
- NS&I GPS client specific legislation (e.g the Childcare Services Act)
- Memorandum of Understanding obligations

The team objective is to ensure that NS&I is compliant with laws and regulations and that risks are identified and managed where policy decisions are made that introduce compliance risk to the business. This includes informing NS&I GPS clients of their compliance with laws and regulations and that risks are identified to the client and managed where the client has made policy decisions that do not adhere to compliance guidance.

Key responsibilities

Team Management

- Management of the Compliance Advice & Delivery team
- Manage the workload of the team to ensure the timely delivery of compliance and legal advice to the business
- Manage the development of the team to ensure an appropriate functional structure exists that supports the NS&I vision, values and competency behaviours towards the delivery of the agreed corporate and B2B strategy
- Advise the team on various aspects as and when required to ensure clear leadership and demonstration of the NS&I values and competency behaviours
- Ensure that the business areas and individuals in both NS&I and business partners understand their responsibilities for compliance matters through guidance
- Ensure GPS clients understand their responsibilities for compliance matters through guidance during the bid process, during implementation and through Change Requests and Impact Assessments.

Compliance Advice

- Work with the business and the Government Legal Department to provide expert input and guidance on policy and requirements to ensure that initiatives are delivered in a way which complies with general law, NS&I legislation and regulations and FCA requirements
- Work with members of the team to provide compliance advice on any changes in regulatory or legal obligations relating to the provision of products or services by NS&I Retail and the GPS offering
- Providing support and guidance for retail business projects as required to enable timely and effective delivery of NS&I strategy and objectives at both project team and project board level
- Assisting GPS service design and delivery by providing compliance guidance to new business bids and projects
- Reviewing and assuring B2B Compliance proposal and business partners' procedures as legislation and Scheme rules evolve
- Keeping abreast of any changes in the law as they impact on the Retail business and our GPS clients and potential bids, analysing their impact and recommending actions to the business for continued compliance
- Working as part of the incident management teams to ensure that solutions and remedial actions comply with laws, regulations, policies, Scheme rules and Memoranda of Understanding

Financial promotions and customer communications

- To formulate, promote, implement and co-ordinate policies, procedures and best practice within NS&I and third party contractors and GPS clients to ensure compliance with the principles of the FCA and ASA in respect of financial promotions
- Ensure that business areas and individuals in NS&I understand their responsibilities for financial promotions through guidance and day to day advice where necessary
- Oversee the procedures for financial promotions ensuring appropriate and timely sign off of artefacts.

Freedom of Information Act

- Ensure that business areas and individuals in NS&I and business partners understand their obligations under the FOIA through guidance and day-to-day advice where necessary.
- Co-ordinating responses to FOI requests received, providing specialist guidance on exemptions and issuing responses in line with legislative timescales and ensuring consistent external messages are issued in line with NS&I's reputational risk appetite. This includes contributing to the provision of responses to Parliamentary Questions within parliamentary timescales for debates in the Houses of Parliament
- Advising NS&I and third party suppliers on complex issues of law in the context of each party's obligations under the legislation
- Conducting independent Internal Reviews on escalated FOI/EIR requests
- Maintain full and auditable records of all requests received and processed
- Delegated responsibility for the management and preparation for Information Tribunal cases with Treasury Solicitors and legal counsel
- Acting as a subject matter expert in escalated complaints cases in respect of public authority duty under FOI

Risk management and reporting

- Assessing key risks using management information and the completion of monthly Compliance risk register
- Contributing to the waivers and dispensations process for reporting to the Risk Management Committee
- Completing quarterly risk reports for the Risk Director to include in their key risk area report to Risk Management Committee
- Contribution to the Head of Compliance's annual Compliance report and half-yearly update for NS&I Governance Committees
- Responsible for the completion of statutory quarterly and annual FOI statistical returns to the Cabinet Office

Bid management and client on-boarding support

- Represent Compliance during the bid process and implementation
- Provide guidance to prospective clients on the application of relevant legislation and regulation,

Official - Sensitive

communicating NS&I's approach to compliance and the options available to fit with their existing operation or to a new Government policy initiative

- Review and approve bid documentation such as Rough Orders of Magnitude (ROM) and Operational models
- Provide detailed resourcing and cost models for inclusion in bids
- Review, amend and create Memorandum of Understanding clauses for new accounts, reflecting agreed requirements throughout the bid process
- Create process maps and procedures for NS&I compliance deliverables

Relationships

| Internal | External |
|--|--|
| <ul style="list-style-type: none">• Reports to the Head of Compliance Advice and Delivery• NS&I Risk Management Committee• NS&I Executive Committee• Customer Service and Complaints teams• Internal Audit/GIAA• B2B Account Management team• NS&I Retail directorate• NS&I Business Delivery and Transformation directorate• NS&I Operational Assurance• NS&I Incident Management team• NS&I Media team | <ul style="list-style-type: none">• Outsourced business partner(s) Risk directorate• Government Legal Department• HM Treasury• HM Revenue and Customs• Office of the Accountant General• Office of the Public Guardian• Commercial Lawyers• Advertising Standards Authority• Financial Ombudsman Service• Information Commissioner's Office (for FOI)• Cabinet Office (for FOI statistics) |

Person specification

Essential experience

Significant experience within a financial services firm which has included the following aspects:

- In-depth knowledge and understanding of all rules, regulations, codes of practice, guidance and industry best practice relating to advertising and customer communications applicable in the retail financial services industry and the ability to interpret and translate them into policies and procedures
- Good communication (both written and verbal) skills. Experience of writing policies and procedures.
- Working knowledge of the FCA's Conduct of Business and Treating Customers Fairly rules, The OFT guidance on unfair contract terms and the ASA codes of conduct for advertising.
- Reviewing policies and procedures to ensure they are reflected correctly in customer communications and vice versa.
- Knowledge of operational processes
- Experience in providing requirements for projects in respect of compliance and regulatory matters
- Writing and presenting management reports
- Good understanding of the complaints handling procedures including the requirements of the Financial Ombudsman Service
- Good understanding of general law

Essential technical knowledge and skills

- In depth knowledge of Financial Conduct Authority rules that apply to the retail financial services industry
- The ability to undertake detailed analysis of complex data, industry consultation papers and new and pending legislation and provide summaries and gap analyses of such information.

Desirable knowledge, experience and skills

- Financial service industry qualifications
- Knowledge of the legislative environment within which government departments operate
- Understanding public authority duties in respect of transparency rules and public sector equality duty

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- Broad knowledge of Legal and regulatory matters in respect of the General Data Protection Regulations and the UK Data Protection Act, Freedom of Information Act and the Money Laundering regulations.

Civil Service Success Profiles Behaviours Level 4

We will use the following behaviours to select against:

- Delivering at pace
- Working together
- Communicating and influencing
- Making effective decisions
- Managing a quality service