



Vacancy - Compliance Administration Assistant, Dundee

Company – Thorntons Investment Holdings Limited supporting both Thorntons Investments and Thorntons Wealth

Job Purpose: Responsible for carrying out day-to-day compliance risk monitoring and supporting the Compliance team on regulatory matters support to the business in line with regulatory requirements.

Principal Responsibilities

- Comply with the Financial Services and Markets Act 2000, the FCA Statements of Principle & Code of Practice and the relevant FCA rules at all times, including conflicts of interest.
- Monitor adherence of Compliance regarding TCF, T&C and Financial Crime procedures of the firm at all times.
- Ensure that compliance records and supporting documentation are maintained, accurate and kept up to date at all times across all areas of the business and in accordance with firm procedures (e.g. complaints record, new business register, financial promotion records).
- Assist Compliance Risk Adviser in responding to requests from the FCA and ensure the relevant notifications to the FCA.
- Maintain records evidencing firm's adherence to TCF outcomes. (Dealings with customers are carried out in a professional and courteous manner and appropriate ethical standards exist within the firm).
- Maintain records evidencing approved persons are made aware of their responsibilities under the FCA's Code of Conduct, Conflicts of Interest and Personal Account Dealing rules (Distribute staff declaration forms for completion annually)
- Ensure knowledge of the necessary regulatory requirements are kept up to date. (Threesixty Compliance Round-up, Regulator up-dates etc).
- Assist Compliance Risk Adviser in ensuring the firm continues to meet its threshold conditions (COND).
- Report to Compliance Risk Adviser on a regular basis on all relevant compliance issues.

Main Duties:

To maintain and support compliance governance activities across the following areas:

Compliance Monitoring

1. Assist with implementing / reviewing / updating risk-based compliance policies, procedures / financial crime procedures.
2. Assist with the preparation of the annual Compliance report for the firm's senior management.

3. Assist with preparing evidence/data for external audits as required.
4. Carry out the due diligence process for professional introducers/new suppliers/third parties as required – creating and maintaining appropriate records and up-dating due diligence checks (at least annually) to ensure compliance with required standards.
5. Carry out recorded telephone call monitoring. Review discussions between fee earner and client and report on any issues identified to the Compliance Risk Adviser.
6. Assist with the preparation of compliance reports /papers for the monthly Compliance Committee. Review content for accuracy and ensuring content covers key reporting issues
7. Monitor and report on regulatory developments. Check for up-dates and notifications from regulatory bodies (FCA, FOS etc) as well as Compliance Consultants Threesixty; analyse these and provide feedback to Compliance Department on actions arising.

Management Information

8. Assist with collation of appropriate MI for submission and review at monthly Compliance Committee (e.g. file audit trends)
9. Maintain up to date Compliance Monitoring Programme monitoring records (e.g. Financial Crime, incidents, breaches, complaints etc) and report any significant movements in risk exposure to Compliance Risk Adviser.
10. Run ad hoc reports as required by the Compliance Department.

Record Keeping / Regulatory Reporting

11. Maintain accurate and up to date Incident & Breach records. Assist with monitoring and reporting on progress of remedial actions through to completion. Escalate material breaches or significant risks identified to the Compliance Risk Adviser immediately.
12. Manage and monitor Personal Account Dealing requests ensure formal approval is sought and given; maintain and keep up to date the Personal Account Dealing Register, reporting any material breaches to the Compliance Risk Adviser.
13. Assist with accurate and timely reporting of FCA periodic reports (including Fees & Levies, REGDATA and Non-REGDATA) ensuring adequate supporting records are held so as to maintain a clear audit trail.
14. Up-date Client Agreement(s)/Disclosure documents as and when changes are necessary and ensure the correct and current versions are in use at all times.
15. Maintain and update the Gift Register twice a year – collating information from fee earners, to ensure compliance with Anti-Bribery Policy.

Advice & Sales Practices

16. Make full and regular use of regulatory guidance resources to further develop and maintain a comprehensive understanding of compliance and governance, including internal policies and

process documents, Threesixty Services extranet, professional seminars/webinars, regulator up-dates (FCA, FOS) etc.

17. Assist with external Compliance Consultants (Threesixty) periodic file audit visits. Room reservations, selection of appropriate files and other preparatory work in advance of the audit visit.
18. Attend file audit feedback sessions, maintain detailed notes on outcomes ensuring that these are accurately reflected in the written report when received
19. Maintain accurate file audit records, analyse adviser responses and ensure remedial actions are signed off by relevant T&C Supervisor

Complaints

20. Assist with firm's adherence to FCA Complaints handling rules and the maintenance of accurate records, ensuring the firm's complaints register is kept up-to-date.
21. Assist with the investigation of a complaint, collate and prepare an accurate timeline of events, assist Compliance Risk Adviser with the data analysis and supporting evidence.
22. Assist with the periodic regulatory Complaints reports to the FCA, review for accuracy and ensure submission within the specified timescales.
23. Ensure client acknowledgement letters include correct enclosures (copy of firm's Complaint Process) and final response letters should include (information on referring to FOS).

Financial Promotions

24. Maintain accurate records and keep the firm's Financial Promotions registers up to date ensuring all financial promotions are signed off and approved by Compliance Oversight.
25. Review current financial promotions in circulation periodically to ensure they are current and up to date.

Recruitment

26. Assist with the administration relating to the recruitment process ensuring all relevant paperwork is completed and checked for accuracy, and assisting the Compliance Risk Adviser as appropriate.
27. Assist with the detailed record keeping for all approved personnel in accordance with regulatory requirements to demonstrate they are "Fit and Proper" for the role in which they have been recruited.
28. Ensure all new regulated personnel are provided with copies of FCA Code of Practice and the firm's rules in relation to Conflicts of Interest and Personal Account Dealing.

29. Maintain induction progress records, assisting Compliance Risk Adviser to ensure satisfactory completion and sign off.
30. Assist with input and processing of Approved and Directory Persons applications/updates/cancellations where required using the FCA on-line administration systems.
31. Maintain adequate and up-to-date records to demonstrate all approved and Directory persons are assessed as fit and proper annually.
32. Assist Compliance Risk Adviser with any relevant annual certification to confirm on-going competency records.

Training and Competence

33. Ensure accurate and up to date T&C records are maintained for all personnel to whom the T&C policy applies.
34. Assist Compliance Risk Adviser in ensuring T&C Supervisors provide adequate records and development up-dates to evidence on-going competence of all relevant personnel.
35. Assist with individual performance records against set KPI's to ensure each individual is subject to the necessary level of supervision outlined in their Adviser Risk Assessment.
36. Ensure CPD logs are submitted quarterly to Compliance. Assist Compliance Risk Adviser in reviewing content to ensure CPD activities are current, appropriate and sufficient and evidence learning outcomes appropriate to the individual role.
37. Ensure that all relevant certified regime personnel are licensed with a current, in date SPS and renewed annually from their Accredited Body.
38. Assist Compliance Risk Adviser with the annual training on Conduct Rules

Financial Crime

39. Assist with annual updates in relation to relevant regulations such as money laundering etc. as directed by the Compliance Risk Adviser.
40. Ensure all staff complete relevant annual knowledge refresher assessments in relation to Financial Crime (Financial Crime, Anti-Money Laundering, Data Security).
41. Assist the Compliance Risk Adviser with the annual MLRO Report. Assist with preparation and up-dating on current risks.
42. Provide role cover for the Compliance Risk Adviser when on annual leave if required.

Person Specification

- Working Knowledge of Financial Services
- Demonstrable knowledge in an administrative capacity
- IT literate

- Analytical – able to collate, produce and analyse reports and data
- Able to use initiative and willing to learn
- Organised and structured approach to work
- Trustworthy – handling confidential and highly sensitive data
- Flexibility to work from different locations when required – Edinburgh and Aberdeen