

General Compliance Manager

Role Description (purpose):

To act as a part of the Carnival Ethics and Compliance Department supporting Carnival UK to ensure that its Ethics and Compliance Programme is effective at mitigating and managing risk in the General Compliance area.

To take a proactive role in leading and coordinating cross-functional working between the Carnival Ethics and Compliance Department and Carnival UK departments with responsibility for implementing General Compliance policies and procedures (typically HR, Finance, Port Operations and Supply Chain).

To liaise closely with the Corporate Compliance Manager (CCM), General Compliance at All Brands Group and the General Compliance leaders across other Carnival Operating Companies.

RUI: (if updating existing JD)		Grade: 8	DBS check required	Not Applicable	
Directorate: (Operating Company where Applicable)	Peter Anderson	Reports to:	Chief Ethics and Compliance Officer		
Function:	Ethics and Compliance	Team:	ABG, Ethics & Compliance		
Direct reports :	Job Titles & Level • N/A				

Accountabilities

The role involves providing Ethics and Compliance Department oversight and leadership in respect of Carnival UK's General Compliance requirements.

The following is a non-exhaustive description of the responsibilities and functions which will typically be required:

1. Participating in, and actively contributing to, regular meetings with the CCM, General Compliance at All Brands Group and others in the Ethics and Compliance Department as required.
2. Participating in internal audits and external programme reviews to promote continuous improvements and identifying other opportunities for continuous improvement in the General Compliance area.
3. Documenting and preserving evidence relating to the Ethics and Compliance Programme and its implementation.
4. Reporting to internal stakeholders on the status of Ethics and Compliance management.
5. Tracking external criteria for new General Compliance requirements, expectations and best practices.
6. Responsible for providing advice and guidance to Carnival UK departments in order to ensure Carnival UK's adherence to the Carnival Code of Conduct & Business Ethics and associated General Compliance Policies, including the Anti-Corruption Policy, Anti-Trust Policy, Sanctions Compliance Policy and Reporting of Improprieties Policy. This will typically include the following activities:

Code of Conduct:

Providing advice and support to Carnival UK departments in interpreting and applying the Code of Conduct and Business Ethics.

Overseeing and inputting on the Business Ethics Disclosure Programme at Carnival UK.

OFAC:

Responsible for implementing procedures to ensure that Carnival UK is able to comply with the Economic Sanctions Compliance Policy, including maintenance of a document identifying screening responsibilities.

Review screening alerts adhering to guidance issued by or on behalf of the CCM, General Compliance for managing alerts for Carnival UK's business.

Periodic discussions/training for Carnival UK departments with screening responsibilities.

Compliance Hotline:

Receive reports that relate to Carnival UK and oversee investigation into reported incidents as directed by or on behalf of the CCM, General Compliance.

Compliance Training:

Work with Compliance Training Lead and the Carnival UK Learning and Development team to ensure relevant compliance training courses are allocated and completed in accordance with relevant training curriculums.

Review and report on monthly completion reports for shore and ship – work with Learning and Development team to address issues impacting completion rates.

Due Diligence:

Support ABG Ethics and Compliance Department to apply a risk-based due diligence to third-party relationships.

Oversee and support Carnival UK departments responsible for third-party due diligence.

Anti-Money Laundering:

Responsible for maintaining and renewing Carnival UK's AML registration with HMRC and for ensuring Carnival UK's AML Policy and associated on board procedures are adequate to ensure compliance with the UK Money Laundering Regulations.

Maintain and periodically update Carnival UK's AML Risk Assessment. Liaise with relevant Carnival UK departments and ships in response to reports/queries/identified risks or gaps.

Health, Environment, Safety, Security (HESS) Responsibilities

- Lead by example by taking care of the health and safety of you and others
- Report all accidents, 'near miss' incidents and work related ill health conditions to your manager/supervisor/team leader
- Follow safety rules and procedures
- Use work equipment, personal protective equipment, substances, and safety devices correctly
- Take part in safety training & risk assessments and suggest ways of reducing risks
- Appoint shore side risk assessment Subject Matter Experts as required to review and approve risk assessments
- Actively promote safe working within your team and encourage safe behaviours
- Demonstrate safety leadership in accordance with our safety leadership behaviours

General Responsibilities

Adheres to Corporate Policies and Procedures, including Code of Conduct, Audit Procedures and any control related responsibility for financial data entered, stored, or reported via business systems within employee's control (list not exhaustive).

To undertake ad hoc duties as required.

Scope:

Problem solving:

Problem solver – should be able to think around a task and come up with a working solution. Able to identify where improvements to policies and procedures are required.

Impact (what impact will the role holder have on the team/ department/ function/ stakeholders):

The role will have significant interactions with the overall Carnival Ethics and Compliance Department and in particular the CCM, General Compliance at All Brands Group and the General Compliance leaders across other Carnival Operating Companies.

Leadership (what level of management is required, ie multiple teams, or small teams) :

No direct reports

Demonstrable Behaviours (what needs to be demonstrated in 'how' to be successful in the role) :

- Ability to actively participate as a member of the Carnival Ethics and Compliance Department and build and maintain relationships throughout the organisation.
- Good interpersonal skills.
- Ability to work as part of a cross-functional team, including working with senior business representatives.
- Proactive/forward thinking.
- Calm under pressure.
- Desire to learn on the job and to grow knowledge of different areas of the Carnival UK business.
- Excellent attention to detail.
- Good workload and prioritisation skills.

Knowledge, Experience and Qualifications required:

Qualifications – essential:

- Undergraduate or Postgraduate Degree level education in a subject broadly relevant to ethics/compliance activity (such as Law, Finance, Business Studies) or appropriate supporting training and work experience.

Knowledge/ Experience – essential:

- Practical experience of applying and interpreting policy documents and identifying and adopting best practice.
- Previous experience of directing and assisting business colleagues in interpreting and applying policy documents.
- An understanding of compliance risk and good practice in identifying, recording and communicating risks and ensuring that risks are tracked and followed up with mitigation.

Qualifications – desirable:

- Relevant Professional Certifications.

Knowledge/ Experience – desirable:

- Experience of undertaking ethics and compliance activity within a large organisation.
- Maritime industry awareness or experience.
- Travel industry awareness or experience.

Issue Date:

xx/xx/19

**Issued by
(name):**

Jane Cripps

REWARD ONLY

Grade:

RUI:

Date Approved:

Initials: