



# Financial Crime Supervisor

## IOM Constabulary Pro Active International Money Laundering Investigation Team

HEO, Pay Band 19

### About the IOMC Financial Crime Team

The Isle of Man Constabulary has two teams with responsibility for the investigation of financial crime at a domestic level and cases of international money laundering.

The Proactive International Money Laundering Investigation Team (PIMLIT) deal with complex international money laundering cases which include money laundering, terrorism financing and proliferation financing. The Economic Crime Team are responsible for domestic related complex financial crime which includes money laundering but on a domestic level. Both teams sit under the direction of the PIMLIT Director reporting to the Chief Constable.

Working in partnership with other agencies the Financial Crime Teams are expected to proactively identify and investigate criminality including working in partnership to restrain and forfeit the criminal proceeds of crime. In addition this will include prevention work such as highlighting ML typologies to prevent and detect financial crime involving an Isle of Man nexus including the flow of funds through the jurisdiction and the illicit use of structures within and beyond the jurisdiction.

As an international finance centre the island is subject to external scrutiny and inspection of its law enforcement regime and performance against the FATF Standards. The focus of the Constabulary is showing effectiveness against its proactive use of intelligence to generate investigations relating to international money laundering and asset recovery.

The team collate, examine and analyse evidence leading to the successful apprehension and prosecution of offenders.

Some of the key responsibilities of the team are:

- Investigating international money laundering and associated offences
- Working in partnership with AML/CFT partners and other Law Enforcement Agencies
- Analysing the current and future threats to the IOM as an International Finance Centre
- Contributing to the National Risk Assessment
- Developing and implementing new and innovative investigative techniques in line with the National Risk Profile for the Isle of Man

### What will you do?

In a rapidly changing financial crime environment, it is critical that the Isle of Man Constabulary, through PIMLIT, remains agile and adjusts its focus and priorities to deliver an effective response to international money laundering crimes where an island nexus exists. This will be achieved through its short, medium and long-term planning and leadership from the first line supervision team at an operational level which is central to this process, supporting the Constabulary's key strategic policing priority.

### Working Together for the Isle of Man

As a supervisor you will:

- Provide first line supervision leading and co-ordinating a team of civilian and police investigators, specialists and support staff working on proactive and reactive international money laundering and terrorist financing investigations.
- Be responsible for efficient and effective tasking, adoption of casework and allocation of resources on a risk based approach in line with the Isle of Man's National Risk Assessment.
- Set and monitor performance management objectives within PIMLIT across its investigative casework and development of the team in line with the terms of reference of the PIMLIT, meeting the strategic aims of the Isle of Man Government Financial Crime Strategy relevant to law enforcement.
- Work with other Isle of Man Law Enforcement agencies to develop or undertake investigations, in particular with the Isle of Man Financial Intelligence Unit (IOMFIU) and International Cooperation and Asset Recovery Team (ICART), Customs and Excise and Isle of Man Financial Services Authority (IOMFSA) playing a key role within the agreed tasking structures.
- Be accountable to the PIMLIT Operations Manager for the timely delivery of investigation casework within the PIMLIT and overall day to day management of the investigation team.
- Lead and manage pro-active international money laundering and terrorist finance investigations and the supervision of high quality files for submission to the Attorney General's Chambers in accordance with the evidential threshold test.
- Ensure that investigations are carried out thoroughly, expeditiously and ethically in accordance with relevant legal requirements including best practice and where appropriate ensuring international standards of criminal investigations are incorporated.
- Maintain a high level of investigative standards, diversity, inclusion and partnership policies and undertaking a lead role in setting investigative strategies.
- Maintain robust supervision and management of all incoming and outgoing intelligence to support investigation casework, while ensuring that such intelligence is used ethically and in accordance with relevant legislation, policy, protocols, codes and practices.
- Use relevant powers under the POCA 2008, including but not limited to the development of warrants, production orders and international letters of request.
- Represent the PIMLIT as a key partner within a collaborative tasking process, adopt investigations and allocate resources on a risk based approach in line with the Islands National Risk Assessment and where necessary negotiate additional resources from partner agencies to ensure that international money laundering cases and terrorist financing crimes are investigated effectively.

- Responsible for the wellbeing of the PIMLIT team, delivering and managing change effectively to enhance improvements and contribute to the organisational development and succession planning of the department.
- Day to day performance and office management, driving continuous improvement and professional standards, maintaining a detailed awareness of economic crime investigations to ensure efficiency, consistency and effective use of resources and financial governance.
- Act as a role model, providing leadership and direction to staff, including mentoring / coaching, empowering people within your supervision to maximise their potential, skills and expertise.
- Maintaining training and competence records of the PIMLIT team for financial accreditation and specialisms including maintaining your own professional competence and continuous development of the team.
- Apply the Fraud Investigation Model (FIM) to ensure that all elements of Prevention, Disruption, Partnership working and Victim management are at the forefront of any international economic crime investigation.
- Develop, build and work in partnerships across other agencies to improve investigative opportunities and the application of legislation and regulatory sanctions at relevant proceedings.
- Encourage the use of technology and support the use of digital investigative tools.
- Attend Court at both civil and criminal hearings to give evidence when required.
- Any other duties as directed by the line manager and commensurate with the grade.

### **Contacts and Communication**

You are the first line supervisor within the PIMLIT for all matters relating to intelligence gathering, investigation and executive action.

You have:

- The ability to communicate, influence and negotiate effectively with your teams and a wide range of stakeholders, including non-technical stakeholders.
- Experience of building and enhancing partnerships and professional working relationships with a wide range of individuals both internally, externally and internationally in order to achieve the organisation and island objectives as an international finance centre.
- Excellent influencing, negotiation and facilitating skills that you are able to use across a wide range of partners within the AML/CFT and law enforcement agencies.
- Experience of chairing meetings and operational briefings both in person and on line.

### **Working Together for the Isle of Man**

You will:

- Participate and actively contribute to operational meetings in a clear, concise and relevant manner, with your teams, senior managers and Senior Investigating Officers and engage with key partners within the AML/CFT arena.
- Produce written and/or verbal briefings and presentations to a range of stakeholders to provide a clear and concise evidence based understanding of the subject matter, including providing advice, recommendations and guidance. Lead and Chair multi agency partnerships meetings within the Anti Money Laundering Group.
- In collaboration with partner's agencies such as the IOM FIU, identify trends and typologies in line with Anti-Money Laundering (AML) offending methodology and Financial Action Task Force (FATF) 40 Standards to support AML prevention and the Constabulary's overall intelligence database.
- Provide expertise in operational planning and preparation for executive action phase of an investigation.
- You will be expected to communicate in a variety of different ways including face to face, Teams meetings, written correspondence and proving evidence at Court.
- Manage a specialist team comprising of civilian and police financial investigators (Grade D400 and Detective Constables) and work collaboratively with specialist roles, analysts, forensic accountants and digital investigators to ensure timely operational delivery is achieved to support the strategic plan.
- Correspond and communicate with law enforcement partners and colleagues in other jurisdictions and further afield to seek and share information and experience.

### **Problem Solving and Decision Making**

The post holder will be expected to have good problem solving skills and the ability to think both rationally and quickly on their feet in order to deal with matters concerning an ever decreasing time frame.

The post holder will be expected to escalate any matters to the Operations Manager.

Any decisions made must be able to withstand scrutiny and may be questioned by a Senior Investigating Officer, the Director or Operations Manager. Decisions must be accurately recorded in line with investigative protocols.

You will be required to liaise with the Attorney Generals Department and on occasions independent legal advisors in order to brief and further investigative lines of enquiry and help bring investigations to a successful conclusion whilst being cognisant of issues that you will have to overcome whilst due process occurs remaining positive and driven to see a case to conclusion.

Develop policy and procedure to ensure effective operational activity occurs within the team whilst maintaining the highest standards of investigation and introducing new innovative investigative techniques.

### **Working Together for the Isle of Man**

## Autonomy

The post holder will be expected to manage staff, overtime expenditure and verify expenditure such as expense claims and training fees in line with Government guidelines and procurement procedures.

On a day to day basis the post holder will be expected to review competing demands, set and agree deadlines and hold staff to account. In turn the post holder will be accountable to the Operations Manager.

The position is responsible for setting the culture and standards within the department for both police and civilian investigators employed within the team.

This position will be responsible for agreeing and implementing executive action (arrest and search phases) to facilitate and finalise the investigative process in line with any overarching objectives set by the SIO.

The post holder is responsible for identifying both individually and collectively areas of personal and team development by way of formalised training and CPD (Continuous Professional Development) in line with the NRA (National Risk assessment).

## Management of Resources

You have line management of up to 20 staff members, (Grade AO, D400) and will be expected to work in conjunction with analysts, forensic accountants and digital forensic examiners and an administrative officer. In addition you will be expected to be the point of contact for external law enforcement agencies seeking assistance from the Isle of Man jurisdiction.

To effectively manage your staff and the delivery of your organisational objectives you will:

- Identify and plan training needs, skills gaps and continuous professional development for self and specialist staff.
- Provide guidance and advice to investigators undertaking financial crime investigations. Provide tactical advice in relation to the review large volumes of data sets from a variety of different sources.
- Provide effective management and support to your team undertaking operational activity and provide weekly investigative updates to the Operations Manager.
- Regularly update your knowledge and attend training events in respect of current developments and innovations for money laundering investigation techniques and relevant legislation applicable to both your team and where appropriate partner agencies.
- Maintain, review and scrutinise accurate records of analytical work undertaken for quality assurance, integrity and disclosure purposes under the Criminal Procedures and Investigation Act 2016 as both an individual and for your team and provide appropriate advice and guidance as necessary.
- Provide localised training and CPD where necessary to enhance and develop your team's skillset.

## Working Together for the Isle of Man

- Be a role model to promote equality, diversity and Human Rights in working practices by developing and maintaining positive working relationships, ensuring that colleagues are treated fairly and contributing to a values-led organisation.
- Any other duties as directed by the line manager and commensurate with the grade.

## **Competencies**

All staff of the Department of Home affairs working within the Isle of Man Constabulary are expected to recognise that the everyday business of the Department requires the highest level of personal integrity. Each role holder has a personal responsibility to maintain the confidentiality of all business and to uphold such confidences both in administering the business within and outside of work.

As a member of Department of the Department of Home Affairs working within the Isle of Man Constabulary, the role holder represents the Department in a wide range of settings. It is expected that they will be a committed ambassador of the Division and the work that it seeks to achieve.

The job holder reports to the Operations Manager, Detective Inspector of the PIMLIT.

The Operations Manager, Detective Inspector, as Line Manager is responsible as 'Reporting Officer' for the implementation of, and compliance with, any departmental provisions for Performance & Development.

## **Performance management and improvement**

The role holder has a personal responsibility for participating in any departmental performance and development scheme management.

The role holder is responsible for his/her own health and safety and the impact of his/her actions on others.

The role holder will be responsible for identifying any possible risks or near misses to a responsible manager and or the Health & Safety Review Group.

The job description is intended to be a guide to the general scope of duties and is not exhaustive. It should be reviewed and amended accordingly.

## Person Specification

Attributes	Essential (E) or Desirable (D)	Method of Assessment
<b>Credibility</b>		
Accreditation as a Specialist Fraud Investigator (Financial Investigator) as set out under the National Crime Agency or City of London Police Financial Investigation Training Programs or equivalent accreditation.	D	CV
Experience as an Investigative Manager with significant experience conducting economic crime investigations related to international money laundering.	D	Interview
Experience of making challenging decisions using the National Decision Model (NDM) or similar decision making model/tool.	E	CV
Experience of developing and maintaining partnership working.	E	CV
Hold or willing to study for ICA certificate in Money Laundering and Diploma in Anti Money laundering	E	CV
Significant and demonstrable recent, relevant experience in an investigative role or law enforcement role	E	CV
5 GCSE or O level equivalent including English Language	E	CV
<b>Capability</b>		
Self-starter with the ability to motivate and drive teams performance.	E	CV
Manage short medium and long term objectives whilst managing competing demands.	E	Interview
Skilled in the use of IT systems and able to transfer skills to utilising police based systems including a knowledge of e-discovery platforms.	E	CV

<p><b>Character</b></p> <p>Comply with the Isle of Man Constabulary &amp; Government competency framework &amp; Code of Ethics.</p> <p>Able to meet strict deadlines and allocate resources accordingly.</p> <p>Able to continually maintain and enhance the knowledge and skills of both the team and yourself.</p> <p>Well organised and highly motivated and driven individual to meet the requirements of the role.</p> <p>Confident and energetic with a can do attitude whilst remaining un-phased by obstacles and problems to overcome during the lifecycle of an investigation.</p> <p>Quickly and accurately assimilates and explains information in a clear manner.</p> <p>Provides a consistent message and is a role model to the team.</p> <p>Ability to set/reassess priorities, under pressure and maintaining resilience.</p> <p>Able to be assertive when necessary.</p> <p>Ability to keep up with changing investigative techniques and tools required to expedite investigations.</p>	<p>E</p> <p>E</p> <p>E</p> <p>E</p> <p>E</p> <p>E</p> <p>E</p> <p>E</p> <p>E</p> <p>D</p>	<p>CV / Interview</p> <p>Interview</p> <p>Interview</p> <p>Interview</p> <p>Interview</p> <p>CV / Interview</p> <p>Interview</p> <p>CV / Interview</p> <p>Interview</p> <p>CV / Interview</p>
<p><b>Circumstances and Interests</b></p> <ul style="list-style-type: none"> <li>• Isle of Man Worker</li> <li>• Flexible approach to work and the ability to travel off island and internationally when required</li> <li>• Satisfactory Security Clearance Check</li> <li>• Full valid driving licence with access to own vehicle</li> </ul>	<p>D</p> <p>E</p> <p>E</p> <p>D</p>	<p>Application Interview</p> <p>Pre-employment checks</p> <p>Pre-employment checks</p>