

JOB DESCRIPTION

Position Title	Head of Compliance & Risk, Gresham House Ireland
Position reports to	CEO, Gresham House Ireland, The Board of Directors The Chairman of the Board of Directors
Salary	TBC
Location	Dublin
Position type	Permanent

Business Overview

Gresham House is a specialist alternative asset manager providing funds, direct investments and tailored investment solutions, including co-investment across a range of highly differentiated alternative investment strategies. Our expertise includes strategic public, private equity (private assets), timber, renewable energy, housing and infrastructure. We aim to deliver sustainable financial returns and we are committed to building long-term partnerships with our clients to help them achieve their financial goals.

From a standing start in December 2014, through a combination of acquisitions and organic growth, the Gresham House business has grown exponentially, with assets under management now at c.£4.7 billion, (30 June 2021), providing a strong and scalable platform from which to continue to grow. The team is delivering on its objectives and now has c.180 employees working in London, Oxford, Dumfries and Perth in Scotland and Dublin.

The business divides into two divisions - Strategic Equity and Real Assets:

Strategic Equity



Public Equity



Private Equity

Real Assets



Forestry



New Energy &
Sustainable Infrastructure



Housing

£1.4bn

£3.3bn

£4.7bn¹

1. As at 30 June 2021

Background

Gresham House Ireland, formerly Appian Asset Management, is a leading Irish based asset manager that was founded in 2003. It manages a range of funds, on behalf of private clients, pension funds, endowments, charities and corporates in Ireland, focused on different areas of investment, from global funds to Irish property. Gresham House acquired Appian Asset Management in July 2021.

Regulated role

This role is deemed as a control function under the Central Bank of Ireland Regulations. Namely, Fitness and Probity Standards 2014 (Code issued under Section 50 of the Central Bank Reform Act 2010). This role holds one Control Function (CF) position and two Pre-Approval Controlled Functions (PCFs) as per the standards:

CF 2	Ensuring, controlling, or monitoring compliance by a regulated financial service provider with its relevant obligations
PCF-15	Head of Compliance with responsibility for AML/CFT
PCF-39F	Designated Person with responsibility for Regulatory Compliance

Key Responsibilities / Accountabilities

To act as Head of Compliance & Risk and Money Laundering Reporting Officer for the Company. The principal responsibilities are as follows:

Regulatory Risk Assessment

- To conduct an annual regulatory risk assessment.
- To report quarterly to the Board in relation to current and regulatory risk.

Upstream (*New relevant regulatory obligations and legislation*)

- To identify and conduct an impact assessment of new regulatory risk on GH Ireland.
- To communicate and to provide an interpretation/guidance in relation to new regulations/upstream events.
- To notify senior management and other relevant stakeholders where changes/amendments to company policy and procedures may be required from a compliance perspective; and
- To ensure effective communication, stakeholder engagement and provision of compliance advice to programs/projects charged with responsibility for the implementation of new regulatory obligations or legislation.

Downstream (*existing regulatory obligations and legislation*):

- To identify and conduct an impact assessment of regulatory risks and for those evolving/maturing regulatory risks, which already exist, with respect to GH Ireland including responsibilities pursuant to inter alia
 - The AIFM Directive/AIFMD Rulebook issued by CBOI
 - MIFID rules applicable to GH Ireland
 - AML regulation including Criminal Justice (Money Laundering and Terrorist Financing) 2010
 - ICAV Act 2015
 - Client Asset Regulations published by CBOI

And all associated regulator issued guidance/guidelines

- To review and/or amend policies and procedures required to comply with evolving/maturing regulations or legislation.
- To provide of compliance advice to the business.
- To maintain and update the Master Obligations Register to Capture Regulatory Obligations in a complete and consistent manner.
- To develop a suite of comprehensive Compliance Policies (GDPR, , Suitability, AML, etc.) for GH Ireland; and
- To support the business in developing and adopting robust, sufficiently detailed procedures for compliance related issues in policy documents. (namely AML/CFT, FS and DPP).

Oversight

- To review all new policies to assess compliance with relevant obligations;
- To review policies, which have been revised as part of the annual review process for compliance with relevant obligations.
- To assist with the Policy Holder annual review of policies and approval by the Board as required.
- To develop and execute the annual risk based compliance monitoring plan.
- To conduct monitoring reviews according to the annual plan and GH Ireland's monitoring methodology.
- To provide subject matter expertise in relation to observations made on potential improvements with regard to business unit processes (through the monitoring process and elsewhere).
- To provide quarterly reporting to the Board in respect to the findings from compliance monitoring reviews.
- To track all issues/findings identified as part of the compliance monitoring reviews to resolution.
- To monitor the error log for compliance related breaches; and
- To manage the issues, breaches and near misses reporting process.

Marketing Approval

- To provide oversight of compliance approval for marketing material including website updates.

New Product/ Service Approval

- To provide sign off as part of the New Product/ Service Approval process, specifically from a compliance perspective.

Communication and Reporting

- To notify the CBI of any of the following matters:
 - Reportable breaches by the Company of relevant Regulations.
 - Breaches of other Irish legislation which may be of prudential concern to the CBoI or which may impact on the reputation or good standing of the Company.
 - The commencement of any significant legal proceedings by or against the Company.
 - Any situations or events which impact, or potentially impact, on the Company to a significant extent.
 - The resignation of a director or approved person and the proposed appointment of a new director or approved person.
 - The imposition on the Company of fines by another supervisory authority, or of a visit to the Company by another supervisory authority.
 - Any proposed change to the external auditor, and of the reasons for the proposed change and of the proposed appointment of a new external auditor.
 - All frauds perpetrated on the Company.
- To respond to correspondence and to any requests for information from the Central Bank of Ireland (CBOI) in a timely and thorough manner and within any period of time that may be specified by the CBOI. As appropriate and where necessary provide information and reports to the CBOI.
- To participate in such meetings as the CBOI considers necessary, including meetings to review its operations and its business developments.
- To immediately escalate and report all material breaches to the board.
- To ensure the maintenance of a Register of Breaches setting out the nature of the breach, its significance and action taken to address same.

Money Laundering ('ML')/Financing Terrorism ('FT') and Financial Sanctions Risk Management ('FS')

- To develop a comprehensive Anti-Money Laundering ("AML") and Counter Financing of Terrorism ("CFT") Policy and a Financial Sanctions ("FS") Policy for GH Ireland.
- To implement and maintain an AML risk assessment methodology and process.
- To monitor controls utilised for the management of ML/FT & FS risks to assess adequacy and determine if executed as designed.
- To provide documentary evidence for approval of PEPs as required.
- To provide subject matter expertise and support to Business in relation to AML/CFT & FS obligations.
- To sign off on the approval of all new client accounts to ensure adequate AML KYI has been performed and risk assessment is appropriate
- To review subscription's and redemption for suspicious activity wrt Money Laundering

Training

- To develop a compliance training plan to include Board training as well as employee training.
- To develop induction training and to manage the delivery of the training plan.
- To ensure that all staff read and familiarise themselves with the Compliance Manual. Note: The Head of Compliance will seek confirmation from each staff member and Directors, that they have read and understand the Compliance Manual and their responsibilities in respect to same;
- To ensure that all staff will be provided with AML training at least annually. The Company will provide all employees and Directors with a training and education session with an overview of the Company's AML Policy and Procedures. All employees will receive the AML training & education session on an annual basis.
- To retain records of all Compliance related and AML training sessions, attendance, material etc.

Compliance Manual

- The Head of Compliance is responsible for ensuring that the Compliance Manual is kept up to date; and
- Where the Compliance Manual is updated, the Head of Compliance will ensure that all employees will be updated on any developments or amendments to the Manual as and when they occur. Staff members will be informed of the changes by the Head of Compliance and shown how it may effect their working practice along with how best to implement the new process;

Management of Complaints

- To develop an adequate policy and procedures to enable effective management of complaints.
- To review complaints received and assess if any further action is required by the Company to ensure a similar issue/incident does not arise in the future.
- To make recommendations for enhancements; and
- To maintain the Client Complaints Register.

Management of Conflicts

- To ensure that GH Ireland effectively identifies and manages any potential conflicts of interest.
- To maintain the Conflict of Interest Register.

Skills & Experience

- A background in Asset / Wealth Management products and Regulation preferred.
- Minimum 4-10 years in financial services - within the second line of defence and / or legal function
- Third level degree preferably in the area of business/ Legal / financial services
- QFA or ACOI or equivalent qualification held
- Strong interpersonal skills
- Strong stakeholder management – including Board level and internal senior management and external stakeholders
- Experience with engagement with the Central Bank of Ireland or other such Regulators required.

Personal Attributes

- Be efficient, reliable and thorough
- Drive and initiative - the desire to add value, proactive approach
- Fast paced - ability to work on a variety of tasks with tight deadlines
- Commitment to the business and the team
- Strong intellect - the ability to analyse and distil information quickly and effectively
- Able to communicate effectively and adapt to anyone within the broader team
- Self-motivated, be able to work on their own but very much a team player.
- A willingness to embrace challenge and work within an evolving / changing environment.
- Task oriented and organised to manage several competing priorities simultaneously.
- A constructive approach with the ability to relate to varying personalities.

Gresham House is an equal opportunities employer and encourages all qualified candidates to apply regardless of their racial, ethnic, religious and cultural background, gender, sexual orientation or disabilities. Gresham House is dedicated to encouraging a supportive and inclusive culture amongst all our employees.

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