**[SAMPLE] COMPLIANCE MANAGER SCOPE OF WORK**

[**Note:** If a compliance function is to be set up rather than an individual compliance manager appointed, then the following sample scope of work needs appropriate amendment.]

* + - 1. [Name] is appointed as compliance manager of [Organisation] with effect from [date].
      2. This role is [full time] [part time] [part time and will be combined with the manager’s other role as [ ]].
      3. The responsibilities of the compliance manager include:

a) overseeing the design and development of the anti-corruption programme;

b) developing or approving the core procedure documents which form part of the anti-corruption programme;

c) overseeing implementation of the anti-corruption programme by [Organisation];

d) overseeing compliance by personnel with the anti-corruption policy and anti-corruption programme;

e) ensuring that the anti-corruption policy and anti-corruption programme are consistent with good practice, and aid compliance with all relevant laws;

f) providing advice and guidance to personnel on the anti-corruption policy and anti-corruption programme and issues relating to corruption;

g) monitoring the effectiveness of the anti-corruption programme;

h) recommending necessary improvements to the anti-corruption programme, and ensuring that these improvements are implemented;

i) communicating as appropriate with the [board] and relevant senior management on compliance risks and issues;

j) leading or co-ordinating compliance investigations.

* + - 1. In carrying out the compliance role, the compliance manager is not assuming any functional management responsibility. The ultimate responsibility for ensuring compliance within their departments, business units or projects remains with the [Organisation’s] relevant functional managers. The compliance manager’s role in this regard is to provide a reasonable level of assurance that these departments, business units and projects are complying with the anti-corruption policy and programme.
      2. The steps to be taken by the compliance manager in carrying out the compliance role are within the discretion of the compliance manager, who should always apply an open and enquiring mind, common sense and a reasonable and proportionate approach.
      3. So as to ensure that compliance issues are taken into account in relation to major business decisions, the compliance manager shall:
  1. attend [board] or senior management meetings at which business decisions of the [Organisation] which could have compliance risks are taken; or
  2. be promptly informed about and consulted on such business decisions of the [Organisation].
     + 1. The compliance manager shall, in relation to the fulfilment of the compliance function, report to the [Organisation’s] [board].
       2. The compliance manager shall submit a formal written report to the [Organisation’s] [board] at least once per annum.