

Job Title:	Manager, Investigations & Fraud	Reports to:	Head Enterprise Risk Management
Unit:	Enterprise Risk Management	Department :	Enterprise Risk Management
Grade:		Date:	
Job holder:		Supervisor:	
Signature:		Signature:	

Job Purpose Statement
<p>To manage day to day investigations and Fraud roles</p> <p>a) <u>Investigations</u></p> <ul style="list-style-type: none"> • To undertake professional and timely investigations into suspicions of fraudulent and criminal activities, and any activities as reported by stakeholders, providing an independent report for management to assist the disciplinary process, control enhancement and represent the bank in any related police and court proceedings. • Liaising and working with law enforcement agencies, professional and commercial organisations in this field of expertise. • Developing training & fraud awareness programmes, workshops, brochures and material for fraud sensitization to customers and employees on Bank's policy on fraud. • Develop initiatives to prevent, detect, investigate and respond to fraud related incidences within the Bank. <p>b) <u>Fraud Risk Management:</u></p> <ul style="list-style-type: none"> • Handling of internal investigations in respect to all reported error, fraud or suspected fraud incidences and timely issuance of reports for management use either for internal or external actions in addressing root causes, introduction of preventive controls and likely prosecutorial/litigation actions. • Fraud Risk Management: Responsible for fraud detection and prevention in line with the NCBA Enterprise wide Risk Management Framework. These programs include Fraud Risk Assessment, exception reports reviews, Industry fraud trends & general intelligence reviews, conducting fraud awareness campaigns and training. • Investigation: Handling internal investigations of all reported error, fraud or suspected fraud incidences and timely issuance of reports for management use either for internal or external actions in addressing root courses, introduction of preventive controls and likely prosecutorial/litigation actions.

Key Accountabilities (Duties and Responsibilities)		
Perspective	% Weighting	Output

	<i>(to add up to 100%)</i>	
Conducting Investigations	20%	<ul style="list-style-type: none"> • Carry out end to end investigations by ensuring that all prescribed investigative / operating methodologies for the various types of investigations are adhered to and by conducting proper planning on high level investigations. • Obtain all relevant evidence related to an investigation. Scrutinise / analyse this evidence and make meaningful observations / conclusions regarding the findings and make appropriate recommendations. • Ensure that witnesses / suspects and victims are interviewed and where necessary obtain written statements. • Compile investigation reports as per the prescribed operating methodology, containing the findings of investigations. • Ensure that each investigation has an accurate, value adding conclusion for the type of investigation conducted. • Make meaningful recommendations as per the type of investigation. This will include, but not limited to, system / people / process failures or internal and external threats. • Make meaningful recommendations to the mandated officials regarding the raising of loss provisions, refunds to clients, repudiations, recovery actions and write-offs. • Assist line management / HR with relevant findings / documentation for use in disciplinary processes. • Ensure that each investigation is concluded within the prescribed and acceptable time limit for the particular type of investigation. • Inform management of any suggestions or proposals to enhance investigative methodology / operating procedure. • Represent the bank in all court matters which includes support police investigation and prosecution pre- trial process, being prosecution witness, holding brief during court sessions in liaison with the bank's lawyers. • Collect timely intelligence to avert fraud incidences. • Carrying out & submission of investigations reports within SLA. This includes compiling case files in line with investigation standards, retrieve and secure all

		<p>appropriate evidence, upload investigation report on the shared folder and signed off hard copy filed in respective case files.</p> <ul style="list-style-type: none"> • Make follow-ups of all cases affecting the bank in one way or another to ensure that the bank's interest is always considered e.g. • On-going investigations • Cases reported to the police • Cases before the courts and • General other Security cases/issues etc. • Monthly update of trackers/data/statistics - (100% completeness with no overdue) • Attend all Uganda Bankers Association Forums • Build network with law enforcement agencies through active engagement with enforcement officers, attending courts, bonding court witnesses, attend to functions/seminars and other social events.
Case Management	20%	<ul style="list-style-type: none"> • To maintain case files and central investigations database to operational standards. • To attend progress meetings with investigation teams/management • Develop own skills from training and work experience. • Participate in production of weekly, Monthly and ad hoc MIs as appropriate. • Ensure credible information is provided for MIs produced by Forensic Investigations and Recoveries. • Prepare and submit whistle-blowing reports to the relevant stakeholders. • Fraud Awareness, training and sensitization Campaigns for both staff and customers.
Fraud Risk Management	20%	<ul style="list-style-type: none"> • Conform to enterprise wide risk framework, regulatory requirements, and industry wide fraud management best practices. • Continuous processes assessments and timely closure of controls gaps identified through RCSA and independent reviews • Maintain Fraud Exposure within appetite • Pro-actively scrutinize identified system transactions for likely fraud indicators and/ or pointers to computer-based frauds. • Analysing fraud trends review (Industry & NCBA) and circulation to the business on monthly basis. • Daily core banking systems monitoring reviews e.g. Netguardian to be summarized into weekly Risk Reporting.

		<ul style="list-style-type: none"> • Intelligence gathering on frauds and provision of monthly updates. • Thoroughness in carrying out tasks (error free, completeness-end to end, factualness,) and clarity on root causes and recommendations on closure of risk findings with minimal RTS-(at most twice). • SLA adherence, responsiveness on issues resolution with minimal customer complaints • Prepare Management and Board reports to be submitted timely. • Daily escalations of exceptions • Preparation of monthly, quarterly, semi -annual & annual key trends reports for management actions. • Carry out staff fraud awareness training as per the sensitization schedule.
Risk Identification and Awareness	15%	<ul style="list-style-type: none"> • Ensure that all risks and/or emerging risks which are identified during an investigation / interaction with stakeholders are escalated to line management upon discovery. • Identify high risk business units and where requested to do so, participate in awareness initiatives. • Carry out independent Risk assessments to identify risk areas for close monitoring.
Stakeholder Management	15%	<ul style="list-style-type: none"> • Develop and maintain relationships with internal and external stakeholders to build synergies and teamwork. • Actively interact with counterparts in the industry to gain understanding of threats and risks and also to share important information on current frauds and fraudsters involved. • Attend to scheduled meeting with the business under the DRMC framework.
Operational Requirements	10%	<ul style="list-style-type: none"> • Inform management of any system, tool or equipment that is required to boost our performance and enhance the capacity to handle critical tasks. • Ensure that strict access control to Forensic premises and documents is exercised and ensure adherence to the Clean Desk Policy. • Participate in and contribute to required office / stakeholder meetings. • Active support to the business in driving the anti-fraud campaign and strict adherence to policies and Ethics.

Job Dimensions

Reporting Relationships: jobs that report to this position directly and indirectly	
Direct Reports	TBA
Indirect Reports	TBA

Stakeholder Management: key stakeholders that the position holder will need to liaise/work with to be successful in this role.	
Internal All Departments NCBA Group and all its subsidiaries	External Government Investigative Authorities Mobile Network Operators All Banks in Uganda External vendors Law enforcement agencies

Decision Making Authority /Mandates/Constraints: the decisions the position holder is empowered to make (Indicate if it is Operational, Managerial or Strategic). Please also highlight any budgetary control responsibility if applicable for the role.
a) Changes in operational procedures for optimal effectiveness.

Work cycle and impact: time horizon and nature of impact (Planning) (e.g. Less than 1 week, 2 weeks, 2 weeks – 1 month, 1month – 3 months, 3-6 months, 6-12 months, above 1 year)
3-6 months

Ideal Job Specifications
Academic: A University degree standard of education, minimum upper 2nd class honors A person with the following disciplines: Finance/Accounting, Economics, Actuarial Science, Criminal justice, Business Management or Management information system, Law etc Professional certifications: Certified Fraud Examiner(CFE), Certified forensic investigator Professional (CFIP) etc.
Professional:

Ideal Job Specifications

Must have attended fraud investigations courses or related training. A person with the following will have an added advantage: -

- (i) Proven experience on fraud investigations, especially on bank frauds.
- (ii) Having at least Five years working experience in a similar position in a Bank or Financial Institution.
- (iii) Computer literacy and/or experience in cybercrime/forensic investigations
- (i) A creative approach to solving problems, attention to detail, well-organized and has a methodical approach to work
- (ii) A demonstrated analytical and problem-solving skills and the ability to recognize non-obvious systems activity patterns
- (iii) Excellent communication (oral & writing) and presentation skills
- (iv) Ability to work under pressure, **remain objective** and to meet deadlines

NCBA Bank Core Value Behaviours (Performance Drivers)

DRIVEN: - We are passionate, make bold decisions and learn from our failures. We seek new challenges and appreciate different views constantly raising the bar. We explore our full potential.

OPEN: - Our interactions are candid, honest and transparent. We listen to each other and our clients. We are inclusive and always respect each other.

RESPONSIVE: - We are proactive, act quickly and resolutely to deliver results. We put our customer's interests at the heart of all that we do. We keep it simple and seek new ways to improve.

TRUSTED: - as a trusted partner, we do what is morally right always. We keep our word. We are accountable and believe in each other.

Ideal Job competencies

Technical Competencies

- Team player with ability to work with other departments, effectively co-ordinate day to-day fraud and investigation concerns, law enforcement agencies etc.
- Organization skills and experience to be able to responsibly and effectively handle all fraud and investigation incidences including required remedial or corrective actions in a professional manner.
- Knowledge and application of modern fraud and investigation practices in the banking/ financial sector to enable the bank achieve consistent compliance.
- Technical skills to effectively perform investigation tasks in a manner that consistently achieves high quality standards or benchmarks and can be acceptable in Courts of Law.
- Handling of investigations
 - Ability to handle investigations with passion for details, unwavering honesty, a determination to getting the truth, uncompromising approach in attainment of facts and always with bank's interests over possible personal gains.
 - Writing skills. This is important for management reports, statement writing for likely use in court processes.
 - Timeliness, thoroughness and factualness in identifying root causes of incidents as this is vital for immediate management actions and/or reviews in line with required enhancement of internal controls, policies and internal procedures.
 - Provision of investigation reports for management decision making internally or externally on possible threatened litigations and/or reputational risks or any other potential risk
- General Legal knowledge to effectively appreciate the legal aspects of cases investigated and laws applicable with regard to frauds and related crimes.
- General IT knowledge to be able to carry out basic investigations on IT related frauds now prevalent in the banking industry
- Crime intelligence collection considering emerging global threats/challenges and respective impacts on day-to-day operations in liaison with other banking industry players
- Ability to train staff on fraud risk awareness, thereby mitigating against inherent risks and/or financial sector experiences/losses

Behavioural Competencies

- Leadership to nurture and sustain stakeholder satisfaction, and implement tactical and operational changes.
- Interpersonal skills to effectively communicate with and manage customer expectations (internal and external), and other stakeholders who impact performance
- Self-empowerment to enable development of open communication, teamwork and trust that are needed to support true performance and customer-service oriented culture.
- Performance management to optimize productivity of assigned duties and ability to perform the job with unwavering honesty, without compromising facts or the best interests of the bank over possible personal gains.