



# Anti-Money Laundering SORTED Programme

Our SORTED programme for law firms offers a fully functional solution to your compliance needs.

**Teal**  
Compliance

**Compliance specialist and CEO of Teal Compliance, Amy Bell, leads a team of expert consultants with over 100 years' combined experience, providing support to law firms and compliance officers on the rules and regulations they need to know.**

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I've been building effective compliance programmes to prevent money laundering through law firms for over 15 years, and as a member of, and current Chair of, the Law Society's Money Laundering Task Force, I fully understand the problems that can be faced.

At Teal, we believe in:

- [Being honest with our clients](#) - we'll never recommend a solution which doesn't fit with a firm's risk profile.
- [Giving our clients practical help](#) - we'll implement our solutions quickly and apply our guidance immediately.
- [Sharing what we have](#) - we share our knowledge and experience and provide valuable support to our clients when they need it.

We care passionately about preventing criminals from using law firms to launder their dirty money earned from drug dealing, tax evasion and human trafficking.

We know how hard lawyers work to serve their clients, but they can often be targeted by these criminals, and this puts them at significant risk of suffering severe consequences.

It's through my knowledge and understanding of the issues faced that I've created Teal Compliance's SORTED programme, offering law firms and compliance officers a solution to those issues.

This guide helps you understand a little more about the SORTED programme we offer. But, if you'd like to know more, simply get in touch.

A handwritten signature in black ink that reads "Amy".

**Amy Bell, CEO of Teal Compliance**



## The Issues

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We often talk to the lawyers we work with about the issues they face and find there's a common theme. They find compliance frustrating and often tell us the hardest thing about compliance is that even though they spend a significant amount of time and effort on it, the processes don't always seem to work.

Our clients also say that it's often difficult to find out what a "risk based approach" means in practice, and it's also difficult to engage staff. Even when everything's in place, staff don't always follow the routines.

We hear about these issues regularly and find that there are common causes.

## The Causes

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We understand that compliance can be frustrating, but we can see that it's often caused by:

- 1** Compliance officers trying to make an 'off the shelf' policy and toolkit fit their business, without being clear on what they want to achieve.
- 2** Law firms often don't have enough resources to enable them to fully implement and monitor a programme.
- 3** Staff are often not engaged with compliance. Training can be formulaic and technical, and often isn't relevant to their role.
- 4** Staff can also feel uncomfortable talking to their clients about AML because they're not given the context of why it's important.



## The Solution

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Our SORTED programme is based on our '6Cs of Compliance', which is a 6-step method that guides you through making a practical compliance framework. These 6 steps consist of:

### 1. Clarity

We explain what the law means and how to apply it to your firm.

### 2. Capacity

We take the firm through the options for resourcing an effective compliance function.

### 3. Communication

No-one likes reading policies or coming to compliance training. We change that. With readable, practical policies and procedures, staff know what the requirements are and, through our interactive live training sessions, they find out why it's relevant and important.

### 4. Commitment

Buy-in from staff is so important and without it, compliance is very difficult. We make it real and change the mindset of staff, so it isn't just a 'tick box' process, but a meaningful and necessary endeavor.

### 5. Consistency

Firms need to know their compliance works, and by introducing a control framework, compliance officers will know where processes are being followed and, more importantly, where they're not.

### 6. Culture

Underpinning all of these is a compliance culture, with clear leadership, as well as an incentivisation programme to maintain momentum and protect the firm.



## What you can expect from us

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There are 4 stages to our SORTED programme.



### Stage 1: Groundwork

#### Diagnostic Gap Analysis

We'll review all of the policies and procedures which your firm has to manage your compliance. We'll then arrange a call with your MLRO to discuss how compliance works within the firm. Following the call, we'll prepare a report of recommendations to improve your compliance and how to resource the compliance function.

#### Masterclass

We'll run a half-day masterclass with your Compliance Team and take them through the legal requirements. After this session, everyone will be much clearer on the task ahead.

#### Briefing for Management Team

We'll arrange a meeting with the Management Team to present our findings and the agreed plan of work. In this session we'll explore how the management of the firm can support the compliance function.



### Stage 2: Design

#### Policies, Controls and Procedures

The law requires firms to have PCPs which address the risks identified in the Risk Assessment. Each firm will have different client and service risks and will therefore need solutions which are tailored to their needs. We'll work with you to produce all the documentation required by the Regulator, ensuring that it's easy to understand and relevant to the needs of the business.

#### Finalise the Design of the Compliance Framework

Once we have all the information we need, we'll produce the final Compliance Framework, together with a brochure for your staff to launch the service.



## Stage 3: Delivery

### **In-House or Remote Staff Training**

We'll deliver training on the policies and the regulations to ensure that everyone's aware of the expectations and how they're embedded within the firm.

### **Induction Training**

We'll provide a recording of the training which you'll be able to use as part of your staff induction training programme.

### **Quarterly Review**

We'll visit you, in person or remotely, each quarter to discuss any forthcoming changes to the rules and regulations. We'll also check processes are being followed and deal with any issues which we've identified.

### **Quarterly Report to the Management Team**

Following the quarterly visit, we'll prepare a report for the Management Team of the activity in the last quarter, our findings and the plan for the next quarter.

### **Quarterly Newsletter for Staff on Compliance**

To support and reinforce the staff training, we'll provide a quarterly newsletter for staff, to keep them up to date on compliance.



## Stage 4: Monitor and Review

### **Annual Audit**

At the 12-month anniversary of the implementation of the policies and training, we'll conduct an audit to test the policies and training. This will be similar to the initial diagnostic.

### **Quarterly Review**

We'll continue our quarterly monitoring activities which include reviewing, reporting and updating staff with our newsletter

### **Annual Presentation to the Management Team**

Following our audit, we'll present our findings to the Management Team, along with any recommendations for further improvements or remedial activity.

### **Ask Teal Service for your Compliance Officer**

Your compliance officer will have access to our 'Ask Teal' service helpline for any compliance issues which may arise.

## What our clients say

Our SORTED programme comes highly recommended by our clients. Don't just take our word for it. Here's what they have to say...



We have been using Teal to support our compliance frameworks, and every aspect of our experience with them has been fantastic. From the training to the audits, and especially the 'Ask Teal' helpline, nothing is too much trouble, and you get quick support from some of the industry's best compliance experts. Just having them there to support our continued growth takes a huge weight off my mind. Highly recommend to firms of all size and structure!

Carrie Caladine - Right Legal

As COLP and MLCO of a large regional full service law firm, with day-to-day responsibility for leading and managing a business unit of 10 fee earners, I have found the guidance and support from Teal an invaluable adjunct to our employed Risk & Compliance team. Their depth of knowledge, response times and commercial pragmatism are invaluable. We had an existing relationship through our primary insurers and, when our full time Risk & Compliance Manager and Internal Auditor both exited the business, we took the decision to outsource the key elements of those roles to Teal. Overall, this has been a hugely beneficial change and gives us access to a breadth of know-how and whole market insight that we did not enjoy previously, this really helps drive compliance in a readily accessible way.

Ross Strowger - Partner, Ashtons

Having heard Amy Bell speak at Law Society events in the past few years, and listened to her practical and pragmatic approach to compliance, I decided that I needed to speak with her after we received notice from the SRA that we had been selected for an AML audit. Amy was extremely helpful when I spoke to her, and gave me some guidance on what to expect with the SRA audit, and how we might improve our processes where necessary. All in all, our audit went well, so when it came to our annual independent AML audit in 2021, we decided to use Teal Compliance.

Simon Harbord was our auditor and his approach to our audit was organised, reassuring and very helpful. Having reassured staff that Simon was approachable and just wanted to listen to how they approached compliance, staff were more than happy to speak with him. We have now received our report from Simon, exactly when he said we would receive it, and we will now work on any points that Simon has highlighted for improvement in our AML processes.

Teal Compliance know their stuff! They are approachable, helpful and knowledgeable, and I would not hesitate in recommending them.

Claire Vincent - Baker Gotelee

## Get in touch

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If you'd like to talk to us about our AML SORTED programme, please get in touch.

**0333 987 4320**

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