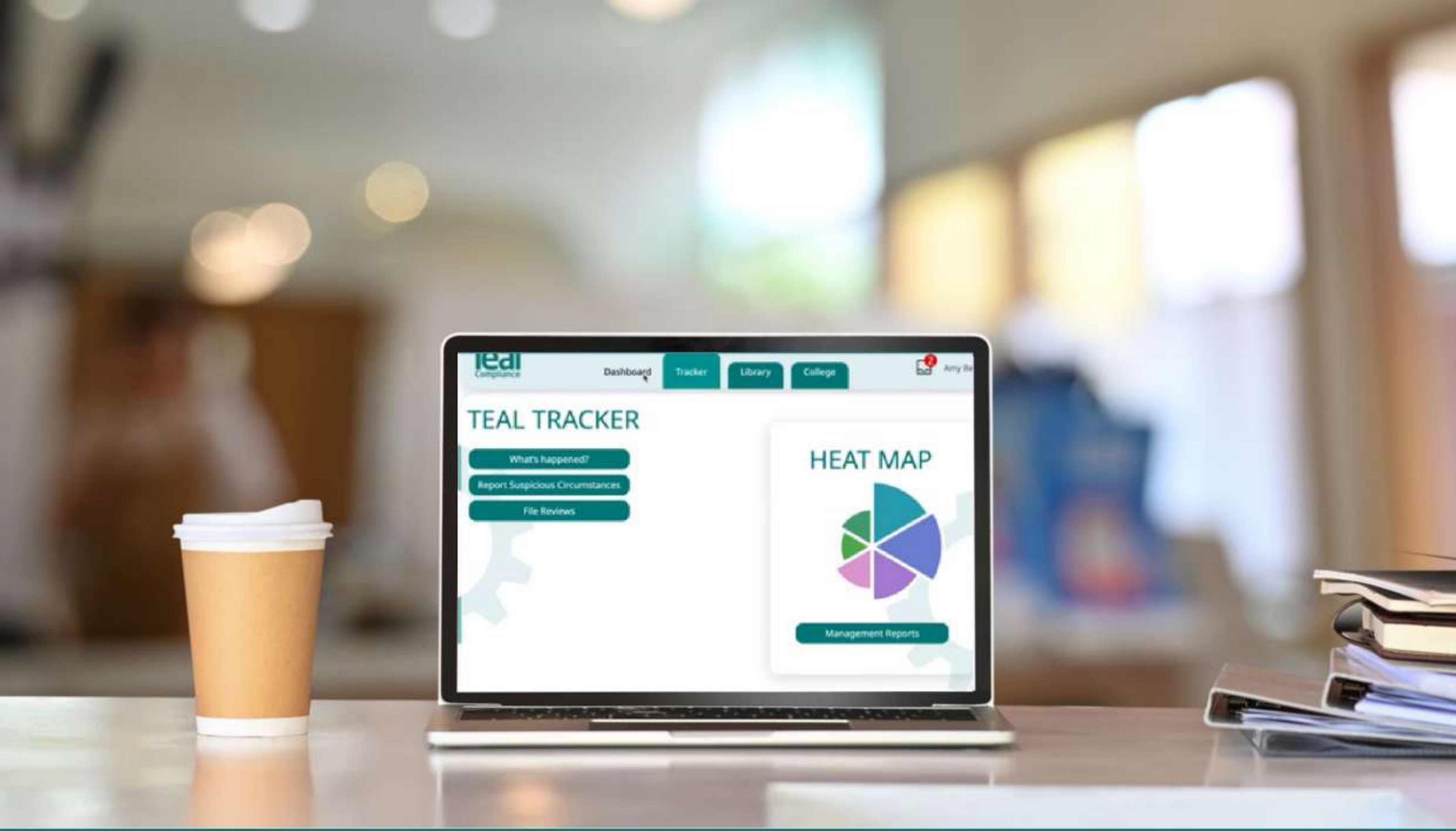


Introduction to Teal Tracker

Teal Compliance's brand new technology platform, Teal Tracker, provides law firms and compliance officers with a programme that works, saves time, builds confidence, and provides valuable data to keep making improvements.

Teal
Compliance

Director of Teal Compliance, Amy Bell, has had the Teal Tracker in mind ever since she started in compliance. Here, she explains how and why it was created, and how it will significantly benefit law firms and compliance officers.

Managing records, making sure you know where everything is, and recording everything, takes up a hugely disproportionate amount of time, as I'm sure most compliance officers will agree.

When I started Teal, I began thinking about the position of a compliance officer, or a head of risk and compliance, given that I've sat where they have. I thought about the challenges that were faced and how technology could potentially help.

I decided to speak to compliance officers to see what they had to say about those challenges and I realised there were some common themes. Many consistently felt that their compliance programme wasn't working and was at risk of falling apart. They felt they put so much time and effort into their compliance, yet it never actually gave them peace of mind that was working.

It was this research that led me to create 'the 6Cs of Compliance' and 'the Compliance Continuum', and it was these two things I had in mind when I built Teal Tracker.

1.The 6Cs of Compliance

Providing a framework is key if you want to ensure that you're meeting your clients' needs, providing them with a great client service, have confidence that your investment in compliance is working, and ensure it's safe, without the risk of regulatory disciplinary action. The framework I developed was the 6Cs of Compliance. These consist of:

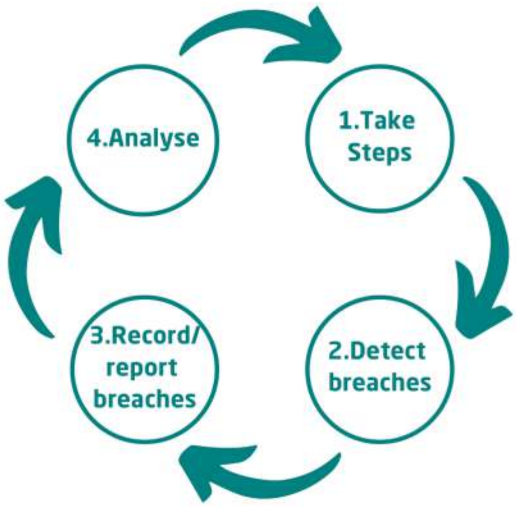
- Clarity: Clarity provides visibility of what's happening in your business as well as what you need to know as a compliance officer.
- Capacity: You need enough resources to ensure you're ticking all the boxes you have to. Where you've not got enough resources, you should look to technology to do some of the heavy lifting.
- Communication: How you communicate with your people is something we spend a lot of time thinking about at Teal. You need to configure your house style to ensure you're communicating effectively.
- Commitment: This may be a small element on the compliance journey, but it's actually a really important one. If you have people willing to commit to being compliant within your business, you'll have much better compliance overall.

- Consistency: It's important that you've got quality controls and procedures in place that you know are being followed. Your process has to be consistent in dealing with issues – keeping track of them to make sure they're followed through until their conclusion, and prove that it's being done.
- Culture: We've identified that culture is actually the biggest part of the 6Cs. This is because, if you don't have a culture that can support compliance, it doesn't matter if you follow the other 5Cs, it will still fall apart. When looking at compliance programmes that don't work, we often find that the reason it's not working comes down to a cultural element.

When considering culture, one of the things we talk about is having difficult conversations when we need to challenge what lawyers are doing. One thing the Teal Tracker provides is data, which assists you when you have to have those difficult conversations as you'll have the evidence to make decisions.

2. The Compliance Continuum

The compliance continuum is a consistent rotation that consists of:



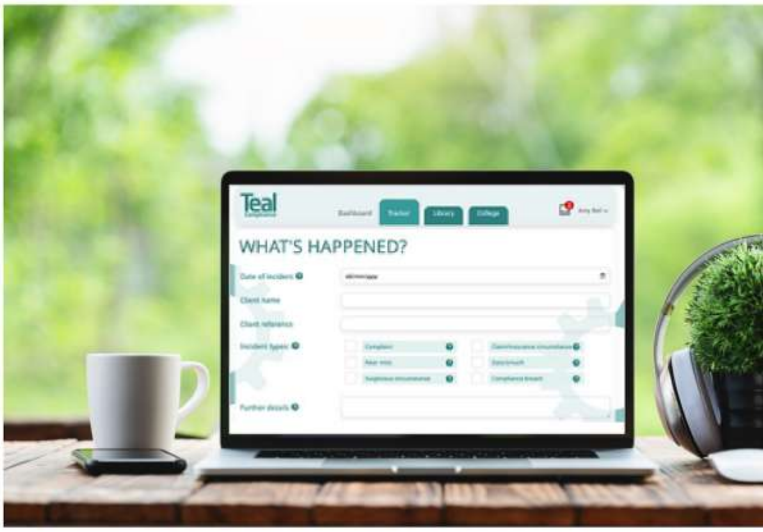
After you analyse, you go back to the beginning and start the process again.

The first three are requirements that need to be done. However, I always add in 'analyse' as although it's an unwritten rule, it's really important. It allows you to reflect when you've had breaches, review the file, and determine what it's actually telling you.

Once you've worked out the issue and analysed it, you can 'take steps' to prevent this from happening again.

So, when I built Teal Tracker, it was the 6Cs of compliance and the compliance continuum that I had in mind, as I wanted to create a programme that works, saves you time, builds your confidence, and provides valuable data which will allow you to keep improving.

What does Teal Tracker do?



Teal Tracker is a living breathing product so it's already evolving and will continue to evolve as people's needs change.

However, now launched, Teal Tracker currently has the following features:

Incident Management

The incident management module is where incidents are reported and tracked. Whether it's a complaint, a breach of the law, or even a near miss, these incidents are reported in the Tracker.

The person reporting the incident will be able to complete a reporting form called 'What Happened?' which can report on:

- Incidents
- Breaches
- Complaints
- Claims
- Circumstances
- Data breaches
- Suspicious circumstances

This isn't so blame can be laid on anyone. It's simply so you can be curious about what's gone wrong and find out which policy or procedure hasn't gone to plan, so positive changes can be made.

The form is intuitive, so when it's completed it will auto-populate the relevant register for each compliance officer. For example, if it relates to a data breach, the person who deals with data breaches at your company will be alerted.

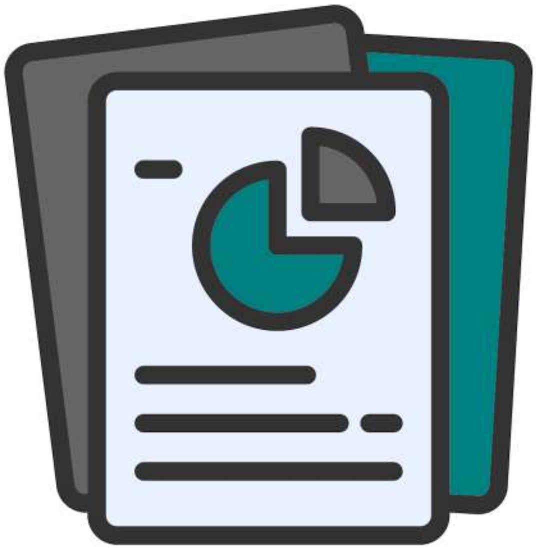
Any actions taken are also input into the incident management module so everything is in one place. There are notification alerts of any issues to review, such as deadlines or actions to be undertaken for all relevant individuals so you can stay on top of everything and nothing will be missed.

Ask Teal Service

Ask Teal is a helpline service that we already run. The service is sold on a subscription basis so you've always got someone at the end of the phone to help you with any issues you face.

We've built the Ask Teal function into the Teal Tracker so that, if you are a subscriber, you can contact us directly through the Tracker. So, for example, if you wanted one of our team to look at an issue that had come up or review a draft response to someone, you'd be able to do this easily and get assistance through the Tracker.

Heat Map



This module pulls data together to provide an analysis of the issues. Reports can be run globally about your business to give you an overall view. You can also use data points that have been created to run reports against them.

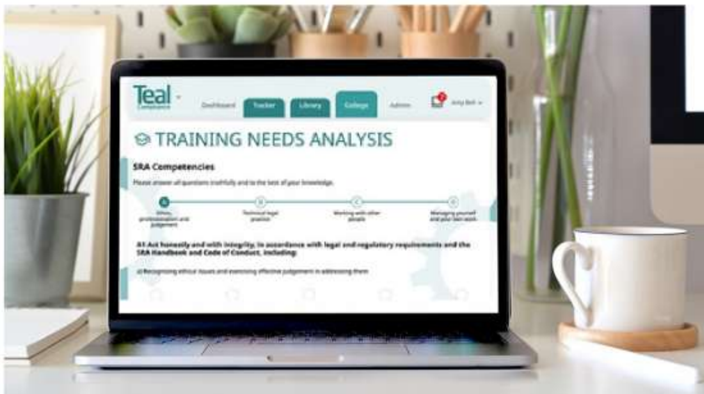
For example, you can run reports by issues, such as if you wanted to see all the claims and circumstances in relation to missed key dates you can create a report. You can also run reports by departments, teams, or fee earners. It really is configurable to whatever you want reporting.

The heat map module is a really important part of Teal Tracker as it enables you to make evidence-based decisions, by running reports and having a full data analysis. Having a data led analysis can be really helpful when demonstrating those issues to partners.

Training Tracker

As someone who used to be responsible for the training of 650 people, I know what a manual and difficult task it is to manage records of the training people have had.

This is further complicated by the need for solicitors to say they're competent annually when you're doing practice certificate renewals.



So, we've built a training tracker module into Teal Tracker. The first part of this tool is the Training Needs Analysis. Fee earners (and any other staff you've requested) will complete an SRA competencies form. At each question, they'll choose between whether they're not confident, fair, adequate, good, or very confident. When populated this will trigger the second part of this tool which is the Training Plan.

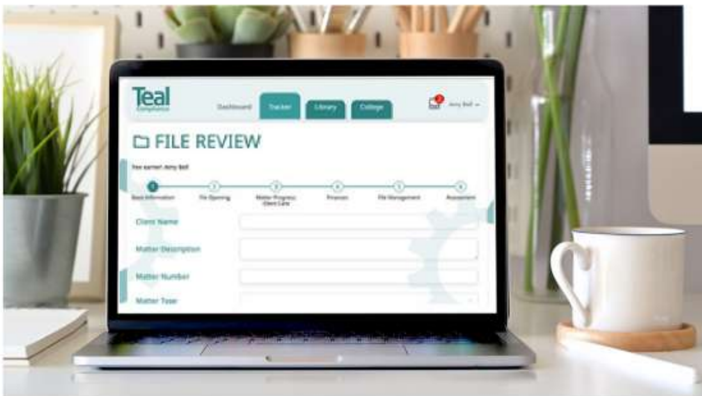
The Training Plan will identify what areas need attention and you can then go through the document and provide feedback with actions to undertake. This is what the SRA expects – for you to reflect on training needs and create a plan.

After the training has taken place, it can be recorded within the system, and lawyers can revisit SRA competencies and confirm that they're now competent. This will build into an annual report for the person who has to do the practice certificate renewals, who will be able to run reports to see those who have and those who haven't done the training.

The reporting element also provides visual data across the firm. When filtering between not confident, fair, adequate, good, and very confident, it will show you which questions there are issues with so you can easily identify areas that need overall attention and training plans which can be put in place.

File Reviews

File reviews is another key module that we've added to Teal Tracker. Firms carry out file reviews to make sure that fee earners are doing what they need them to do, but it can be quite time-consuming as there are a number of elements involved:

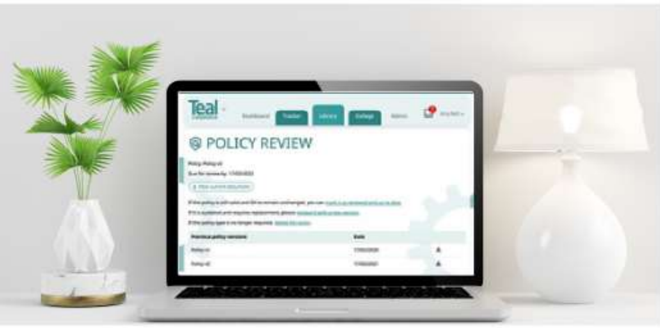


1. Doing the file reviews
2. Recording the file reviews
3. Chasing corrective actions
4. Analysing the results

We've therefore built this into Teal Tracker.

We've included Smart Forms for you to complete which are CQS and LEXEL compliant, so if you're doing file reviews for those purposes, all the questions you need are there.

The file reviews module can remind people that file reviews are due and you can see the progress of those reviews. It also has a corrective action log where you can identify how many corrective actions are still outstanding.



Teal Library

We've also built a library into Teal Tracker. The library has two main functions.

Firstly, it's a precedent bank with policy and procedure templates, report templates, guides on how to demonstrate compliance in various areas, and checklists

Secondly, it's a policy manager where you can upload your policies. When uploaded, you can choose to use it as a vault, where you keep your policies and procedures safe, or you can provide staff with access to it and use it as an intranet, where they can access your policies and procedures whenever they need them. There's a function within this tool that enables you to roll out your policies and procedures and monitor when they've been downloaded or read. It even lets you know if someone has only spent a second reading them.

You can also set deadlines for when your policies and procedures need to be reviewed or amended and you receive notifications when these are due.

Something I get asked about a lot when speaking to compliance officers is version control. If there was ever an issue that was being investigated by a regulator, they would want to see what version you had at the time, which is why it's an important feature of the Tracker.

You can set periods when your policies and procedures should be renewed and the policy manager will remind you when they're due. When you start to change a policy or procedure, it will automatically save as a new version, so you'll never have to worry about version control. In addition, the library also includes the Teal Times which is a newsletter written for clients on the latest compliance developments.

Frequently asked questions

I hope the above has given you an idea of the benefits of the Teal Tracker. You can find out further information by visiting TealTracker.com, but in the meantime, here are some of the most frequently asked questions.

Does Teal Tracker also cover Scottish Law Society requirements?

Currently, the Training Needs Analysis is written for SRA firms, but we can definitely look at creating different questions sets for other regulators. That being said, all the guides and templates have a Scottish version and we're currently working on a version for the CLC.

Can we store information within this portal and away from our own systems?

Yes, you can. So, for example, if you're dealing with a complaint, you might want to keep internal discussions out of your own CRM system so you know where they are and that they're safe, with restricted access. This is why we built that functionality in Teal Tracker.

How secure is Teal Tracker?

Teal Tracker has been designed to have an easy login experience so it uses a single sign-in to manage logins. It will therefore use your existing work email account, either Microsoft or Google. This means the portal matches whatever security standards are already required for your company.
So, if a two-factor authentication is enabled on your work account, that will be used when logging into Teal Tracker.

How do you know if you've got tasks that need to be dealt with?

When you log into Teal Tracker, there's a bar along the top that will confirm how many tasks you have outstanding and this number is displayed in red, so it's easy to identify. When you click on this, you'll be provided with a breakdown of all the different tasks you have outstanding, which you can click into individually.

Are you able to upload documents to the incident form?

Yes. Within the form, there's a section that asks if you have any evidence or supporting documents. If you do, you can upload them here.

Can we remove the Teal branding on the Tracker?

One of the subscription options is Enterprise. This option allows you to white-label the product so you can remove the Teal branding and add your own.

What happens if there's more than one incident type when completing the incident report form?

We've designed the incident report form so you can select more than one incident type when reporting an incident. For example, if there has been a complaint that was also a near miss, both of these can be selected. Each incident type you select opens up one or more other questions for you to complete. The idea behind this is to get as much information as possible right at the beginning so that when you're doing any investigations, the register will provide you with a full picture.

Are you able to easily find and go back to incidents that have been reported?

Yes. There's a section under the Tracker called 'Registers'. This section gives you the option to select the register you're looking for, such as a complaint, a near miss, a data breach, etc. Once chosen, a list of those reported incidents will be populated.

The incidents are listed in date order and have filters to help you find what you're looking for. Once you've found the entry you're looking for, simply click into it and you'll find all the information and uploaded documents that relate to this incident.

What if there are multiple actions required for one incident?

There is an option to add an action log to an incident. You can add as many actions as you wish into the action log and each action logged will have its own deadline. Each deadline will trigger a notification when it's reached.

If you subscribe to Ask Teal, how do you send documents for review easily through Teal Tracker?

When you upload your supporting documents, we've added a button that says 'Ask Teal – Get your documents checked'. Once uploaded, simply click on that button and our team will review the document for you and check everything is correct.

What data does the file review section generate?

The questions are pretty standard and should work for most firms. The reason why we have asked standard questions is because we're we want to ensure you have something which is easy to analyse. If you have lots of different questions for different departments, it will be quite difficult for you to analyse the whole piece.

However, it is possible to add other questions, especially if you choose the Enterprise package.

Can we integrate it with our own case management systems?

We built Teal Tracker with this in mind, so it could be integrated into other systems. However, this would be a bespoke piece of work.

Is there an AML-specific file review questionnaire?

There's currently not a specific AML file review questionnaire. but we're looking at this for a later version of the Tracker.

How are file reviews allocated?

When we set you up on the system, we'll take you through an onboarding process where we collect all the other roles, how many other people are going to have file reviews, and how often. That will automatically alert people to do the file reviews when they need to be done – so it's essentially done on set up.

Are fee earners able to access Ask Teal?

If you subscribe to Ask Teal, I would advise you to switch off the Ask Teal button for fee earners as the value of it is really dependent upon your role.

When setting up your users, you can say whether or not they have access to the button, so people without access won't see it and won't be able to use it.

Some firms, particularly smaller firms might want that functionality where it comes direct from the fee earner. The beauty of doing it this way is we can create a vault of all of these things, so if you were in a smaller firm and didn't have the time for them to go through to your compliance team first, or you don't have a compliance team, you'll be able to view it as the COLP and see all the queries and where it's up to on the system.

Can copies of file reviews be saved outside of Teal Tracker?

Yes. Everything in Teal Tracker is downloadable. For firms purchasing the Enterprise package, it may be possible to integrate your system and directly transfer that information.

What is visible to fee earners?

It's entirely up to you who is able to see what. When setting up the Tracker we can set up restrictive access for certain sections so only you and others with specific needs can access them. So, for example, registers won't be available to everyone who has a login.

Can emails be uploaded as evidence?

Yes, you can upload emails to the system and keep them as evidence in this one central place.

Can all staff members submit incident reports?

It's entirely up to you but we would recommend making the incident form available to everyone in the firm and not just fee-earning staff. What this is trying to do is capture near misses as well as actual issues, and I do sometimes think if you really want to know what's happening in compliance you have to speak to your support staff.

The subscription packages available are based on a per firm basis and not per user, as we don't want to discourage you from adding users due to the price.

Are reminders emailed to users as well as appearing on the notification tracker?

Yes, reminders are emailed to users as well as appearing in the notification tracker. You can set the frequency of the emails, but by default it's weekly unless something arises which needs to be brought to the attention of a compliance officer urgently.

Can we customise reports?

At the moment, we're not able to build something where you can set out your own parameters. However that being said, if you see something you want to report on, let us know. If it's easy to do, we'll look into it. If it's something that's a bit tricky you might have to request a ticket and we'll see what we can do. What we're trying to build are reports which are for most people, so the reporting can be configured in whichever way you want. It's difficult when you get free text boxes to do that but where you're just asking questions that have an answering field that's easy for us to do.

How long are the subscriptions?

The subscriptions are all for 2 years. This can be paid monthly or all in one go, whichever you prefer. Full details of package levels and pricing can be found on TealTracker.com.

Get in touch

If you'd like more information about Teal Tracker or would like to request a demo, simply contact us

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