

# SQM Assessments during Covid-19 - Webinar



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# Presenter

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# Agenda

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- Options
- Remote Audits – is it a possibility?
- Remote Audits – the process
- Tips to help you prepare
- Corrective Action
- Confidentiality
- Questions & Useful Resources

# Options

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- ❁ Decisions on the overall process must be approved by LAA - no formal decision as yet for audits booked/due after 30<sup>th</sup> June.
- ❁ Firms may opt for remote audit or delay.
- ❁ On-site audits are currently being considered, subject to a health and safety assessment and all parties being agreeable.
- ❁ Position for audits 1<sup>st</sup> July and beyond is expected to be announced in the next few days.
- ❁ If you are due an audit post 1<sup>st</sup> July you must still make the application within the usual time periods (6 weeks prior to deadline).

# Remote Audits – is it a possibility?

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- You must have access to key staff (Quality Representative; E&D, Finance and Complaints Managers and supervisors) for interview.
- If any key staff are furloughed, someone must be nominated (and for this to be documented) as temporarily looking after each of these key roles.
- Furloughed staff count when looking at numbers of fee earners and scoping out the number of interviews / files to be reviewed.
- Furloughed staff can be made available, but the auditor should not insist on this.
- You must be able to provide access to staff, case files and central records, remotely.

# Remote Audits – The Process

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- The audit will be conducted through the usage of digital technology, such as Skype, Zoom, Microsoft Teams, WhatsApp and FaceTime.
- The overwhelming preference is for video interviews.
- You are responsible for choosing the interface and inviting the auditor to meetings (in case of any data breach).
- It is recommend that all those involved in the audit be given training on using relevant video conferencing software in advance (including sharing files if that is what you will require them to do).
- Having a chat function to contact the auditor throughout the assessment will be helpful.

# Remote Audits – Choosing the Technology

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- Should be no additional cost, apps such as Skype, Zoom and WhatsApp are free or have free versions.
- A lot of Organisations are utilising Microsoft Teams currently.
- Can be completed through Smart Phone or Tablet with good internet connection. Should not be a barrier to remote assessment.
- Ability to share file data through CMS, shared drives, data rooms.
- Refer to ICO guidance on Home Working at <https://ico.org.uk/for-organisations/working-from-home/how-do-i-work-from-home-securely/>

# Remote Audits – Case Files

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Files can be looked at electronically:

- Grant the auditor remote access to your case management system.
- Sharing across video conferencing such as by using the sharing file function in Microsoft Teams.
- Scanning copies of files to a shared dropbox.
- Scanning copies or screenshots of documents sent via e-mail.
- The auditor may agree to the firm providing limited documents from the file (rather than you needing to scan copies of the whole file).



# Remote Audits – Central Records

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Central records will have to be provided as usual:

- ❖ Copies will need to be scanned and shared with the auditor; or if available via the Compliance Caddy or some other digital format, then the firm can give access to the auditor remotely.
- ❖ Important to be clear with auditor exactly what is required e.g. copies of all client feedback questionnaires, a sample, or a summary of responses.
- ❖ This might be a 2-stage approach e.g. provide complaints register, then auditor may request correspondence relating to specific complaints.
- ❖ Think about how to access more sensitive documents (e.g. personnel records, financial information) and whether you will send them in advance or share via video-conference during the audit.

# Tips to help you prepare

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- Key is in early planning and regular communication - expect the planning process to take longer than usual.
- It make take significant time to scan and send copies of documents – discuss what is required before copying everything. Auditors are likely to want documents several days in advance of the audit date.
- There is flexibility, if needed, so that assessments can be spread over a longer period of time to help the process work smoothly.
- Auditors will accommodate where they can, but ultimately the onus on providing evidence that you comply with the SQM lies with the firm.
- Train staff and test ability to share documents in advance of the day.

# Corrective Action

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- There is some flexibility around corrective action where COVID-19 has had an impact on being able to complete this within 28 days.
- For example, where it is deemed that training has not been met, staff may not be able to access relevant training until later this year.
- This may be followed up at a later date by either Recognising Excellence or your LAA Contract Manager.
- It is possible that if the auditor is not satisfied at the end of the process, the outcome might include the right to complete an onsite visit at some later date.
- The option for a further visit would only be where the auditor did not feel they were able to maintain the integrity of the standard via remote auditing and not an opportunity to be re-audited where something was clearly not compliant at the time of the audit.

# Confidentiality

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- Already an agreement in place with Assessment Body and Auditor.
- Recognising Excellence is registered with the ICO.
- Data kept only for as long as necessary, deleted post-review outcome.
- Quality Standard is a contractual requirement for the LAA.
- Auditor is used to working remotely / at home.
- Practice should control logins, passwords and invitations.
- Sensitive Personnel Data is not required & should not be sent. E.g. Medical / Financial / Criminal Record.

# SQM Assessments during Covid-19

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- Any Questions?
- Useful resources:
- LAA: <https://www.gov.uk/guidance/coronavirus-covid-19-contract-management-and-assurance>
- Rec Ex: <https://www.recognisingexcellence.co.uk/>
- Your SQM Auditor.
- DG Legal consultants can help you prepare - [retainer@dglegal.co.uk](mailto:retainer@dglegal.co.uk)  
(or [info@dglegal.co.uk](mailto:info@dglegal.co.uk) for non-retainer clients).