

# Century-old Insurance Company Automates 100% of its Regulatory Change Program



## OVERVIEW

Before Canada was even a nation, its preeminent, property and casualty insurance company was up and running. Though proud of its legacy, in 2022, Gore Mutual Insurance Company knew it had to modernize its regulatory compliance management program for the future—stat. With guidance from Tutela Solutions, this nearly 200-year-old business satisfied OSFI regulatory requirements and established holistic, enterprise compliance in a matter of months by creating unique automations in Onspring.

## PROFILE

**Company:**

Gore Mutual Insurance

**Industry:**

Auto Insurance, Finance, Financial Services, Health Care, Life Insurance

**Personnel:**

500

**Headquarters:**

Cambridge, Ontario, Canada

**Year Established:**

1839

**Products Used:**

- Audit & Assurance
- Contract Management
- Controls & Compliance
- Risk Management
- Third-party / Vendor Risk



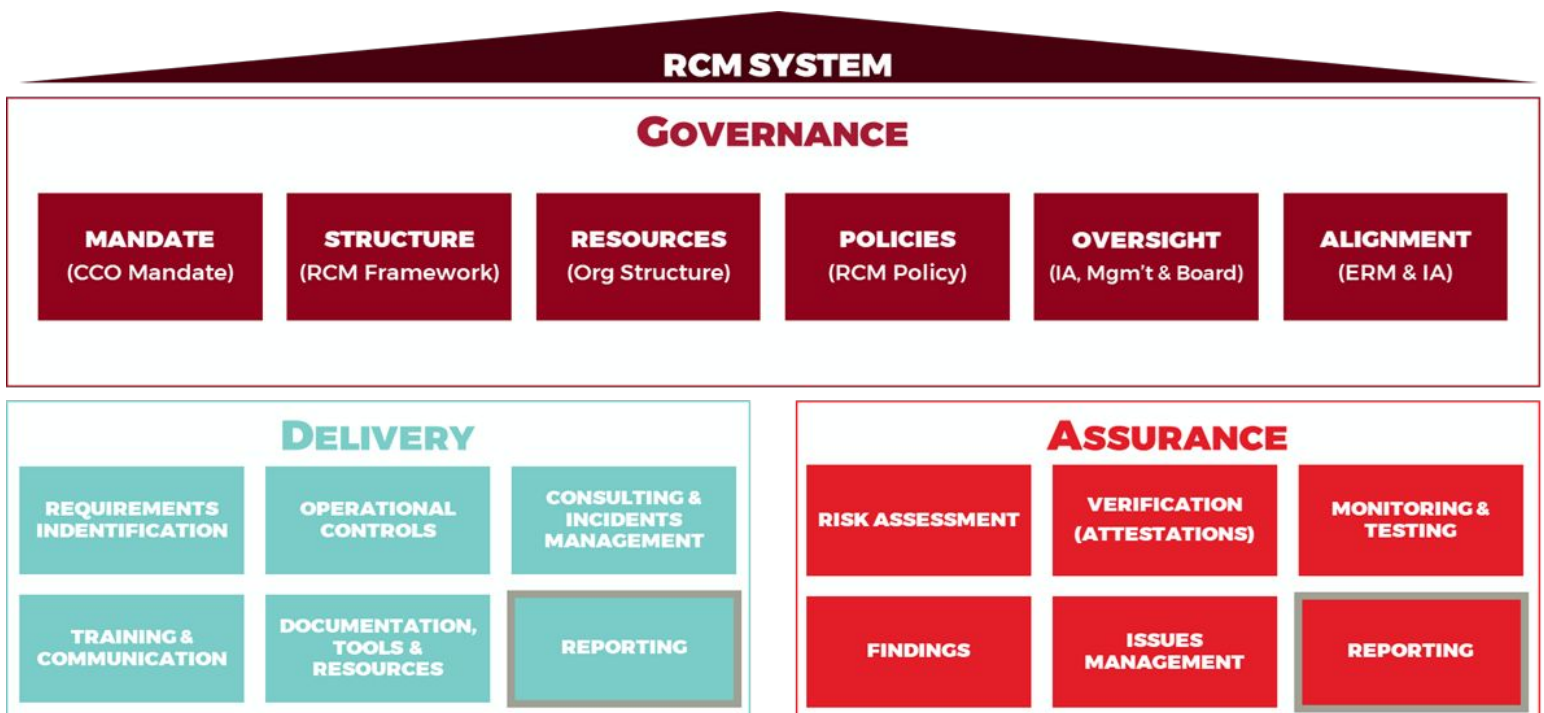
25%

Reduction in admin workload

## CHALLENGE

As a federally regulated financial institution, the Office of the Superintendent of Financial Institutions (OSFI) expects Gore Mutual to maintain a risk-based regulatory compliance management (RCM) program, focused on three core components.

1. **Governance**  
*(program design)*
2. **Program Delivery**  
*(requirements identification, control design & implementation)*
3. **Program Assurance**  
*(control testing at both business unit & compliance levels)*



An effective RCM program requires enterprise-wide engagement, so Gore Mutual needed to foster meaningful relationships across more than 12 business units—*from finance to underwriting, human resources to technology, marketing to claims*—all of which were required to comply with a varying number of legal and regulatory requirements, some of which were in the process of heavy scrutiny by Canadian regulators.

Developing relationships was challenging: compliance functions are often seen as an organizational burden rather than innovation and value-add partner.

All business units were keenly focused on their own ambitious roadmaps with over-stretched resources trying to modernize their function in accordance with company transformation goals.

Gore Mutual needed to embrace the challenge of making their RCM program not only accessible but efficient for our business partners. They looked to the Onspring platform as the key to their success.

**330**

Unique regulatory requirements

**294**

Compliance controls

**12**

Business units

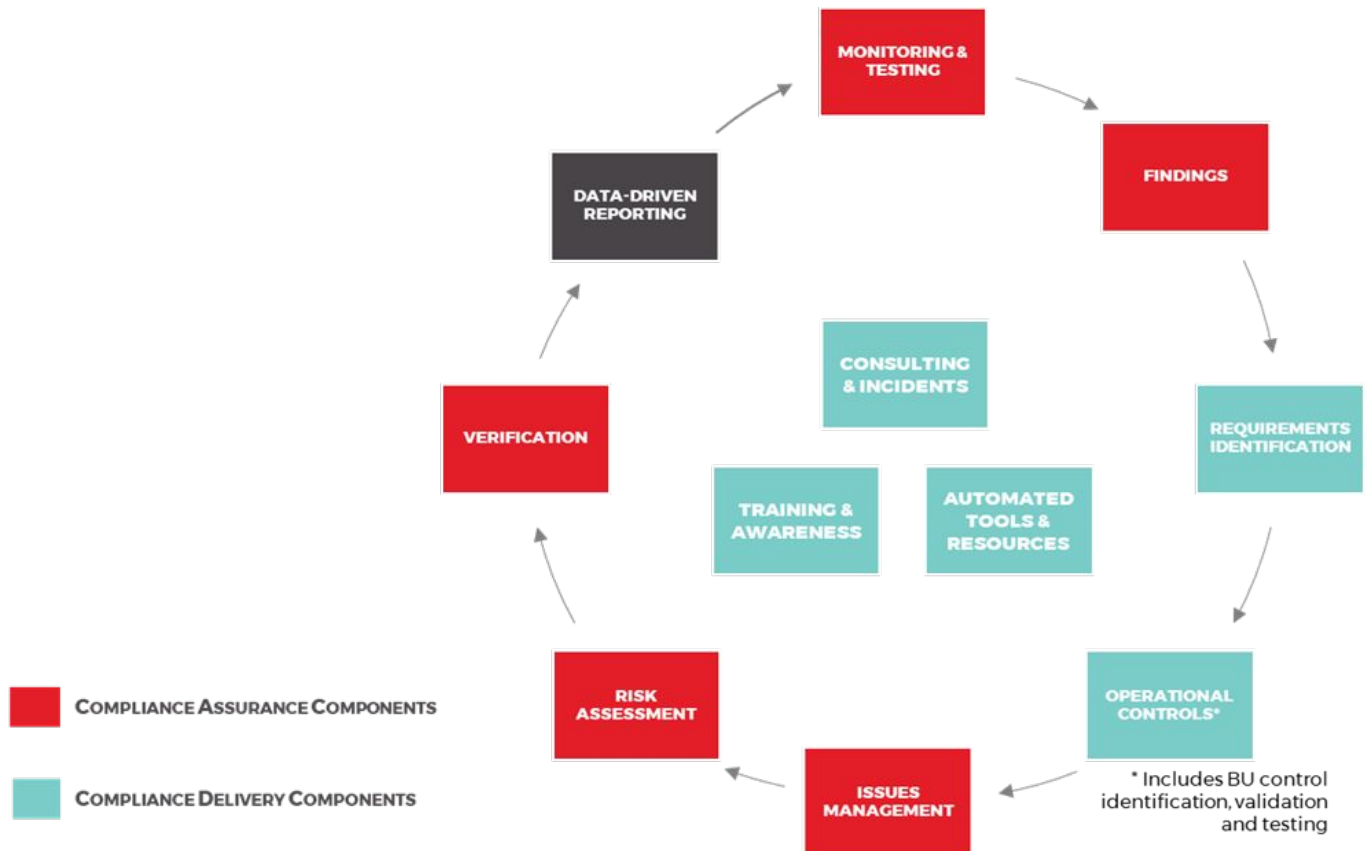
The team also recognized their regulatory compliance management program was cyclical nature.

Federal regulators expect property and casualty insurance companies to undertake a compliance cycle at least annually.

Additionally, the program's core components mandated a significant level of effort from Business Unit Compliance Officers (BUCOs) around **requirements identification** and **operational controls**.

### PAIN POINTS TO ALLEVIATE

1. Mandated OSFI program expectations
2. Evolving regulations & requirements
3. Missing visibility into current status of BU compliance
4. Significant level of effort for requirements identification
5. Time-intensive, cyclical evaluation of 330 unique regulatory requirements, 294 compliance controls spanning more than 12 business units



## SOLUTION

It became clear to the Gore Mutual team that they had two great opportunities to catapult efficiency and streamline a tedious process.

**First**, they wanted users to focus on unmet regulatory requirements assigned to their business unit. The team needed a way to visibly account for individual regulations and automatically notify BUCOs.

**Second**, they needed a way to inform the frequency of compliance control testing by the results of annual compliance risk assessment. For example, a high-risk control must be tested at a minimum of every 6 months, but ideally it would be tested quarterly.

**“We had spreadsheets for spreadsheets. It was very difficult to pull everything together into one picture because we had to look into six different spaces.”**

Sonya Stark  
Chief Compliance Officer  
Gore Mutual Insurance

*Listen to their Story*



## CHALLENGE 1

### Requirements Identification:

Identify regulatory and legal requirements applicable to the specific business unit, which vary across 13 provincial jurisdictions.

## RESOLUTION

### Creation of a control mapping dashboard

| <input type="checkbox"/> | Name              | Regulations without Controls Linked to Organization  |
|--------------------------|-------------------|--|
| <input type="checkbox"/> | Claims            | Consent for Credit Information (Claims) (CG-PI-65), Payments into Court (Minors) (BC-MC-98)  |
| <input type="checkbox"/> | Corp. Compliance  | Employee Snooping (CG-PI-67)   |
| <input type="checkbox"/> | Distribution      | Distributor Oversight (BC-MC-97), Conflicts of Interest (Distributors) (MI-CI-1)   |
| <input type="checkbox"/> | Finance           | Asset Securitization (CG-GO-103), Prudent Person Approach (CG-GO-104), Investment Limits & Concentration (CG-GO-105), Securities Lending (CG-GO-106), Pledging Policies (CG-GO-107), Transfer of Business & Reinsurance (CG-GO-108), Derivatives - Non-Centrally Cleared (CG-GO-109), Stress Testing - Derivatives (CG-GO-110) |
| <input type="checkbox"/> | Marketing         | Commercial Electronic Messages - Third Party Contracts (MI-CP-2)   |
| <input type="checkbox"/> | People Experience | Disconnecting from Work (CG-EP-57), Non-Competition Agreements (CG-EP-58), Employee Electronic Monitoring (CG-EP-60)   |
| <input type="checkbox"/> | Shared Services   | Accessible Washroom (CG-EP-59), Risk Management Plan (Winter   |

9 items

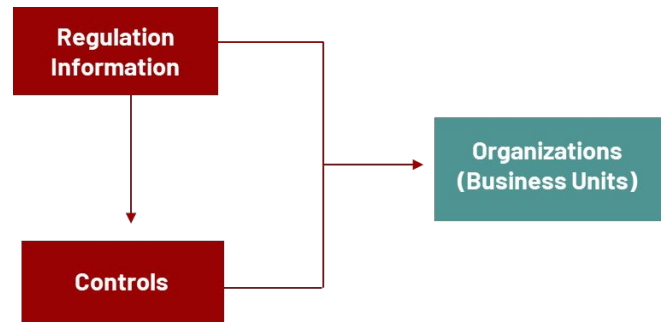
Tackling the regulatory requirement identification process first, Gore Mutual dove into Onspring’s out-of-the-box compliance workflows and reports to relate regulatory requirements to controls.

Next, the team needed to create an alert to notify business units of their new and/or unmet regulatory requirements.

Enlisting the help of Tutela Solutions, Gore Mutual created a report and a corresponding dashboard to alert BUCOs to new and/or unmet regulatory requirements assigned to their business unit, which also seamlessly enabled the identification and documentation of a responsive control.

This automated process connected three applications:

1. **Regulation Information** stores the specific regulations Gore Mutual is striving to satisfy.
2. **Organizations** is where each of the Business Units are documented such as Claims, Marketing, Underwriting, etc.
3. **Controls** houses the specific steps to adhere to the regulation documented per Business Unit.



When gaps are identified, Organizations can update an existing Control or create a new Control to ensure alignment. This convenient visibility ensures Business Units have Controls documented for the Regulations they are required to meet—and Corporate Compliance has transparent status information.

| Regulations   | BU Controls  | Incidents   | Findings   | Mitigation Plans   |
|---|--|---|--|--|
| <b>Regulations - Missing Refere...</b><br>0<br>None                       | <b>Controls - Missing References</b><br>0<br>None  | <b>Incidents - Missing References</b><br>5<br>Review Required | <b>Findings- Missing References</b><br>8<br>Review Required            | <b>Mitigations - Missing Refere...</b><br>2<br>Review Required   |
| <b>Regulations Awaiting Review</b><br>2<br># Awaiting Review              | <b>BU Controls</b><br>0<br># Requiring Review      | <b>Open Compliance Incidents</b><br>4<br># Open               | <b>Compliance Findings</b><br>1<br># Awaiting Mitigation               | <b>Compliance Mitigation Plans ...</b><br>2<br># Plans Past Due  |
| <b>Regulations w/o Organizations</b><br>0<br># w/o Organizations Assigned | <b>BU Control Tests</b><br>2<br># Requiring Review | <b>Open Ombudsman Incidents</b><br>1<br># Open                | <b>Privacy Findings</b><br>0<br># Privacy Findings Awaiting Mitigation | <b>Privacy Mitigation Plans Past...</b><br>0<br># Plans Past Due |
| <b>Open Regulatory Changes</b><br>29<br># Open Regulatory Changes         |  | <b>Open Privacy Incidents</b><br>0<br># Open                  | <b>IA Findings</b><br>1<br># IA Findings Awaiting Mitigation           | <b>IA Mitigation Plans Past Due</b><br>19<br># Plans Past Due    |

## CHALLENGE 2

### Operational Controls:

- Identify, design and implement operational controls within the specific business unit that are responsive to the relevant regulatory requirements, plus evaluate their design.
- Testing the operational effectiveness of their identified and implemented operational controls.

## RESOLUTION

### Integration of Controls & Risk Register App

Gore Mutual knew that in order to meet regulatory expectations, all control testing needed to be risk-based and provide critical insights into the effectiveness of their RCM Program without overburdening business Partners.

**Testing Frequency Warning**

**WARNING!**

The **Test Frequency** is greater than the **Minimum Required Testing Frequency** based on the Inherent Risk of this Control.

**Action Required:** Please update the **Test Frequency** to at least the **Minimum Required Testing Frequency** or more frequently.

**Test Frequency**

**Test Frequency**

1 Year(s)

**Testing Frequency Compliance Check**

**X** Non-Compliant



Once again, it began with Onspring’s out-of-the-box workflows to operationalize the risk assessment process by mapping to the Risk Register app easily enough.

Then they customized the solution even further. The entire process was built to inform the business unit control operation testing based on a frequency guided by the inherent risk assessment from the control’s underlying business process.

Now, their automated RCM program contemplates an Annual Compliance Risk Assessment, wherein each business unit considers the level of inherent and residual risk of non-compliance within their core business unit processes.



| Underlying Business Process<br>Inherent Risk Rating |        | Min Testing<br>Frequency | Target Testing<br>Frequency |
|---|--------|--------------------------|-----------------------------|
| 1 - 3   | Risk   | Bi-Annually              | Annually                    |
| 4 - 5   | Low    |                          |                             |
| 6   | Medium | Annually                 | Semi-Annually               |
| 7   | Medium |                          |                             |
| 8   | High   | Semi-Annually            | Quarterly                   |
| 9 - 10  | High   |                          |                             |

## RESULTS

### Massive Efficiencies

The most critical need for Gore Mutual was a platform that could automate their entire RCM program their way and fast.

In just a matter of months with Onspring, they automated **80% of the RCM program's components**, with the remaining 20% slated for later in the year. This eliminated manual, burdensome processes for BUCOs, such as navigating endless spreadsheets, and has **reduced their administrative workload by an estimated 25%**.

### Flexibility that Integrates the Enterprise

Since implementation, they've greatly enhanced the visibility of their RCM program monitoring and reporting, **with real-time insights and trending dashboards**. Compliance is seen in a new light, one that enables timely and value-add organizational contributions.

"Now we have our enterprise risk management team, our procurement team, internal audit, third-party vendor management and more coming into Onspring," reiterates Sandra Malcolm, Director of Compliance. "Together, we leverage internal reporting and data sharing among all of us without the previous lag time and email chaos. It's an amazing improvement."

**80%**

RCM processes transformed with automation

**0 min**

Wait to review program monitoring & value-add contributions

**25%**

Admin workload reduced & burdensome processes eliminated

“When we started our journey to modernize Gore Mutual’s compliance function, we recognized and revelled in the opportunity to transform within a broader organizational transformation.”

Sonya Stark  
Chief Compliance Officer  
Gore Mutual Insurance

## ABOUT ONSPRING

Onspring is a cloud-based, no-code GRC platform for reporting, analysis, process management, and coordination. We create efficiencies for your teams and put key metrics at your fingertips—anytime and everywhere.

Get started with our solutions in days, not months, and easily tailor them to your requirements.

With Onspring, you’re in control.  
Learn more at [onspring.com](https://onspring.com)

