



THE TRUSTED HUB OF THE
GLOBAL INVESTMENT COMMUNITY

Regulated by
The Guernsey
Financial Services
Commission

THE ID REGISTER

COMPLAINT HANDLING PROCEDURE

Last Updated: April 2021



INTRODUCTION

As a licensed financial services business, The ID Register is required to have in place a procedure for the effective consideration and fair and proper handling of any complaints relating to our regulated business activities. The following procedure is designed to ensure we observe high standards of integrity and fair dealing in the conduct of our business and act with due skill, care and diligence towards our clients and counterparties in relation to the handling of complaints.

Complaints can be made via the Helpdesk links on the website:

<https://www.theidregister.com/complaints-policy/>

WHAT IS A COMPLAINT?

A complaint is any oral or written expression of dissatisfaction:

- whether or not it is considered justified;
- about providing, or failing to provide, a financial service in or from the Bailiwick of Guernsey; and
- alleging actual or prospective financial loss, material distress or material inconvenience.

A significant complaint will be considered one where a complaint alleging a breach of the Law, mala fides, malpractice or impropriety, or repetition or recurrence of a matter previously complained of (whether significant or otherwise).

PROCESS FOR HANDLING COMPLAINTS

Any person who is dissatisfied with the actions or inactions of The ID Register, or our employees, may lodge a complaint. Complaints may be lodged by a complainant to a member of staff in several different ways i.e. verbally in person, by telephone, by email or by letter.

If you receive a complaint (whether verbally or in writing) please forward either the written communication, or details of your conversation with the complainant, to a member of the management team as soon as possible, who will update the Complaints Register. All complaints must be acknowledged in writing within 3 days of receipt.

Complaints will be investigated by a member of the management team or an appropriate person appointed by a member of the management team. The person carrying out the investigation must be independent of the circumstances of the complaint to ensure it is assessed fairly and impartially.

A complaint must be investigated promptly with competence and diligence – additional information should be obtained where necessary. The ID Register aims to complete investigations within 8 weeks of receipt. If an investigation is not completed within a period of 4 weeks, the complainant should be advised on the progress of the investigation and provided with a likely completion date.

The investigation should assess whether the complaint should be upheld and what redress and/or remedy may be appropriate.

Once an investigation is complete, a full written response must be sent to the complainant. The response should either:

- accept the complaint and offer any appropriate redress and/or remedy;
- offer redress and/or remedy without accepting the complaint; or
- reject the complaint and give clear reasons for doing so.

The ID Register should comply promptly if the complainant accepts the redress and/or remedy offered.

Upon completing the investigation of a complaint, we should also consider whether to redress similarly affected clients who have not complained.

COMPLAINTS REGISTER

Each complaint received must be recorded in the Complaints Register. The staff member with whom the complaint was initially lodged should create a new entry with the information known at that point in time. Further information should be added as the investigation progresses. It is important for sufficient details to be recorded to allow us to demonstrate that the complaint has been dealt with (or is being dealt with).

Information about complaints recorded in the Complaints Register is used to inform senior management and the board of directors of recurring or systemic problems within the business so that corrective or preventative measures can be identified and implemented. It is important therefore for the information recorded in the Complaints Register to be comprehensive and up to date.

SETTLED AND UNRESOLVED COMPLAINTS

We may treat a complaint or significant complaint as settled and resolved if a substantive response has been given to the complainant and (after the expiry of 4 weeks from the date of our response) he/she has not indicated to us that the response is unsatisfactory. The decision to treat a complaint or significant complaint as settled and resolved may only be made by a member of the senior management team.

VERSION CONTROL			
VERSION	AUTHOR	DATE	CHANGES

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