

Disputes and Complaints Policy

1. Purpose and scope

Verifile is committed to handling issues fairly, transparently, respectfully and without unnecessary delay. This policy explains how to raise an issue, what happens after it is received, how personal data matters are handled, and the review or escalation routes available.

This policy applies across Verifile Group companies to issues raised by candidates, clients, employees and former employees, workers, contractors, job applicants, suppliers, business partners and other individuals or organisations interacting with Verifile.

You do not need to decide whether your issue is a concern, complaint or dispute before contacting us. Tell us what has happened using one of the routes in this policy. We will assess the matter, explain how it will be handled and apply any relevant process.

2. Our approach to how issues are managed

When you tell us an issue we will:

- listen and consider the information you provide
- treat you fairly, respectfully and without discrimination
- assess the nature of the issue
- direct it to the appropriate person or process
- investigate or make appropriate enquiries where needed
- keep you informed where additional time or information is required
- explain the outcome and
- take appropriate corrective action where an error or service failure is identified

An issue may involve more than one process, and you only need to raise the matter once. Where different legal or operational requirements apply, we will manage each relevant part appropriately and explain the applicable owner and timescale.

3. How to raise an issue

Please contact us as soon as reasonably practicable after identifying an issue. A delay will not prevent us from considering it, although it may affect the information available to support our review. A dispute concerning a Verifile report should normally be raised within three months of the report issue date.

Candidates

Candidates may contact Verifile directly or raise the issue through the client that requested the screening service. If contacting us directly, please provide your full name, candidate reference number where available, and a clear summary of the issue.

Telephone: +44 (0)1234 339330

Email: hello@verifile.co.uk

Clients

Clients should contact the Verifile Client Services Team and provide the relevant details, including any candidate or report reference where applicable.

Telephone: +44 (0)1234 339350

Email: service@verifile.co.uk

Employees, Workers, Contractors and Job applicants

These individuals should normally use the reporting route set out in the relevant internal People policy. If unsure, they may contact the People Team at peopleteam@verifile.co.uk or another appropriate internal contact.

Suppliers, Partners and other Stakeholders

Suppliers, business partners and other stakeholders may raise an issue through their usual Verifile contact or the relevant service team.

Written correspondence

Head of Customer Service

Verifile Group

5 Franklin Court

Priory Business Park

Bedford

MK44 3JZ

4. How we assess your issue

The descriptions below guide our internal assessment. They do not create separate entry routes, and you do not need to select a category before contacting us.

Concern

A concern is an issue, question or observation brought to Verifile's attention that may require clarification, action or referral to another process.

Complaint

A complaint is an expression of dissatisfaction about Verifile's services, communications, actions, processes or handling of a matter where a response or resolution is expected. You do not need to use the word "complaint" for us to recognise it.

Dispute

A dispute is a formal challenge to the accuracy, completeness, ownership or application of information, or to a decision, outcome or process, where review or correction is requested.

An issue may fall into more than one category. For example, a challenge to inaccurate personal data may be both a dispute and a personal data complaint. We will identify and apply each relevant process and keep you informed.

Initial assessment and ownership

When we receive an issue, we assess what happened, who is affected, what type of issue it is, whether it involves personal data, privacy rights or an incident, and which process, owner and timescale apply, and we may contact you to clarify the issue, confirm identity or authority, or check that anyone raising it on behalf of another person is authorised to do so.

5. How do we review and respond

General complaints and disputes

For a general service complaint or dispute, Verifile will:

- Acknowledge receipt within two working days.
- Review the information provided
- Assign an appropriate owner
- Conduct an investigation where appropriate
- Request further information where necessary
- Work with relevant parties to establish the facts
- Correct any errors identified during the investigation
- Aim to provide a response within 5 working days, wherever possible
- Explain the outcome of the review.

If we cannot provide a substantive response within five working days because of complexity, missing information or reliance on a third party, we will explain the reason, identify the next step and provide an update on expected progress.

Corrective action

Where we identify an error or service failure, we will take appropriate corrective action. Where a dispute relates to information contained within a report, we will review the available evidence and take appropriate action based on the outcome of our investigation.

If we determine that the error was made by a Verifile Group company, we will correct the information and, where appropriate, issue updated information or a replacement report at no additional cost.

If the issue arose because incorrect information was supplied by a candidate, client or another third party, additional verification may be required before changes can be made. In some circumstances a new application, order or screening activity may be required, and the applicable fees may apply.

Our response

Where appropriate, our response may explain:

- our understanding of the issue;
- the enquiries made and information considered;

- the findings and outcome;
- any corrective action taken or planned;
- any part being managed under another process; and
- any available review or escalation route.

Confidentiality, legal requirements or the rights of another person may limit the information we can provide. If so, we will explain this as far as reasonably possible.

6. Personal Data Complaints

Depending on the service and circumstances, Verifile may handle personal data for its own purposes or on behalf of a client. Where a client or another organisation determines why and how personal data is processed, that organisation will generally be the controller and Verifile will act as its processor. In other circumstances, Verifile may act as the controller.

You do not need to determine whether Verifile is acting as a controller or processor before contacting us. We will assess the relevant role and direct the matter appropriately.

Regardless of these roles, individuals may raise an issue with Verifile about:

- Accuracy of personal data
- Use or sharing of personal data
- Retention of personal data
- Security of personal data
- Handling of privacy rights requests

We will assess whether the matter should be managed under the personal data complaints process, privacy rights request process, data incident management process or another relevant procedure.

How we handle personal data complaints

When we identify a personal data complaint, we will

- record and assess the complaint
- acknowledge it without unnecessary delay normally within 15 working days and no later than 30 calendar days after receipt
- make appropriate enquiries
- take appropriate steps to respond;
- keep the person informed about progress where appropriate and
- communicate the outcome without undue delay

The 30 calendar day period is the statutory maximum for acknowledging a data protection complaint, not our target response time.

When another client or another organisation is involved

Where a client or another organisation determines how and why personal data is used, we may need to work with that organisation to investigate the matter and agree the appropriate response.

Depending on the circumstances:

- Verifile may respond directly;
- the client or another organisation may respond;
- Verifile may provide information to support that organisation's investigation; or
- the organisations may work together to consider different parts of the issue.

We will explain where another organisation needs to be involved. We will handle and share personal data only as appropriate for considering and responding to the matter.

7. If you remain dissatisfied

Disputes and complaints

If you remain dissatisfied after receiving our response, you may request a further review by a senior manager. Please provide your complaint reference, details of your original concern and why you remain dissatisfied.

Personal data complaints

If you remain dissatisfied with how we have handled a personal data complaint you may also request a further review by a senior manager using the same route.

You also retain the right to complain to the Information Commissioner's Office at any time, as set out in our privacy notice at www.verifile.co.uk/privacy. Requesting an internal review does not affect or delay your right to complain to the ICO (Information Commissioner's Office).

People matters

Where an employee, former employee, worker, contractor or job applicant has raised a matter under an internal People policy, any review or appeal will normally follow the route set out in that policy.

Where the matter also includes a personal data complaint, the relevant data protection rights will continue to apply.

8. Learning and continuous improvement

Verifile reviews complaints, disputes and privacy-related concerns to identify improvements to its services, processes, privacy practices, employee experience and customer experience. Relevant themes, root causes, corrective actions and overdue actions will be reported through the approved governance arrangements.

9. Policy maintenance

The document owner is responsible for maintaining this policy, ensuring that it reflects the approved operating model and presenting it for review and approval. Senior management is responsible for monitoring the policy's effectiveness and ensuring that material issues and trends are reported through the appropriate governance route.

This policy will be reviewed at least annually and earlier where there is a material legal, regulatory, operational or organisational change, a significant complaint or incident, or evidence that the policy is not operating effectively. Each review and approval will be recorded in the document change log.

10. Deviations from this policy

Deviations from this policy are not permitted unless approved in advance by the appropriate Senior Leadership Team member responsible for the affected business area, in consultation with any relevant supporting functions where necessary.

All approved deviations must be documented, including the rationale, associated risks, mitigating actions and approval details. Records of approved deviations must be retained in accordance with Verifile's governance and record retention requirements.



ISO 9001
ISO 14001
ISO 22301
ISO 27001



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5 Franklin Court, Stannard Way
Priority Business Park, Bedford MK44 3JZ
+44 (0)1234 339 339 www.verifile.co.uk

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Change Log :

Version	Date	Reviewer	Change Log
1.0	12/08/2012	Lindsay Winch	Document created and approved
2.0	18/12/2013	Andrew Daniel	Amended address and contact details. Small text changes.
2.1	16/01/2014	Lindsay Winch	Reviewed. No changes.
3.0	27/02/2015	Lindsay Winch	Reviewed and removed complaint reference number from section 'Who do I contact?' on page 4.
4.0	14/04/2016	Lindsay Winch	Updated Service Manager to Service & Operations Director. Policy Format updated.
4.1	01/02/2017	Jennifer Rulton	Document reviewed – no updates required
5.1	20/06/2018	Lindsay Winch	Document updated with new formatting
6.0	23/04/2020	Peter Quarry	Updated with branding and owner changed to Craig Bryce
6.1	15/03/2021	Leanne Carmedy	Document reviewed. No changes made.
7.0	04/05/2022	Leanne Evans	Document owner updated from CB to FS. Updated with new branding. Added introduction and amended to include all VF subsidiaries.
7.1	18/01/2024	Sharon Ford	Update date
7.2	24/01/2025	Louise Davies	No changes required
7.3	25/03/2026	Louise Davies	Removed CEO electronic signature
8.0	9/09/2026	Louise Pitt	Full policy review. Introduced a single route for raising concerns, complaints and disputes; clarified definitions. Expanded scope to include workforce and other stakeholders. Added data protection complaint requirements, controller/processor context, and consolidated internal review and ICO escalation wording, updated service timescales