



CREST. Building trust in the digital world, together

Complaints Handling Process

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1. Executive Summary

The professional and efficient handling of complaints is a critical factor for all organisations in any industry.

The procedure should be based on the principles of natural justice which means that:

- The process is fair, timely and confidential
- The outcomes are justified and based on evidence.

An effective complaints handling procedure will:

- Use language that is easy to understand
- Describe the types of issues and complaints to which the procedure applies
- Outline the options available to resolve complaints
- Explain how formal complaints will be handled and give examples of possible outcomes
- Include assurance around confidentiality and record keeping
- Provide an option to review a decision or recommendation
- State that there will be no victimisation or disadvantage conferred on the complainant
- Be reviewed regularly for effectiveness.

As part of the application process, CREST requires all Applicant Companies to sign a mandatory Code of Conduct. The Code of Conduct contains the basic principles that underpin good business practice and ethics. It describes the standards of practice and behaviour that are expected and is enforceable by CREST if necessary.

CREST also requires that Applicant Companies provide a copy of their client complaint handling process. On approval as a Accredited Member Company, they are also required to update their process for CREST Assignments to reflect the requirements of the CREST Complaints Handling Process. CREST Member Companies also attest to providing CREST with the information it requires to conduct an investigation on behalf of a Client. CREST also requires that an Accredited Member Company's complaint handling process is provided to each Client and that they also provide CREST with relevant points of contact in the event of a complaint being made against them.

The following CREST Complaints Handling Process outlines the principles that CREST will follow and the measures that will be taken to investigate a complaint and reach a conclusion that is both fair and accepted by both parties.

2. Definitions

- 2.1. “**Accredited**” in the context of this Code of Conduct means a Member Company that has successfully completed a CREST audit of its quality processes, data handling procedures, technical methodologies and any other assessment criteria required by CREST for delivery of a Service accredited by CREST. “**Accreditation**” shall be similarly construed.
- 2.2. “**Applicant Company**” in the context of this Appeals Procedure, means an organisation applying to CREST for:
- (i) Pathway; and/or
 - (ii) Pathway+; and/or
 - (iii) Accredited Member Company
- 2.3. “**Certificant**” in the context of this Complaints Handling Process, means an individual sitting a CREST examination or holding a CREST certification. For the avoidance of doubt, this includes individuals that:
- (i) are booked on to a CREST examination. and/or
 - (ii) are in the process of taking a CREST examination. and/or
 - (iii) have taken a CREST examination. and/or
 - (iv) hold a CREST certification, including any granted via equivalency recognition scheme.
- 2.4. A “**Client**” means an organisation employing a Member Company utilising Consultants where CREST has been referenced in tender or contractual documentation.
- 2.5. “**Complainant**” means the person or entity making the complaint, which may include CREST.
- 2.6. “**Consultant**”, in the context of this Complaints Handling Process, means a skilled person who meets the following criteria:
- (i) the Member Company deems them to be appropriately qualified for the Assignment they are involved with, which may or may not mean that they are a Certificant; and
 - (ii) is providing specialist or expert advice and/or information and/or a Service to a Client of that Member Company; and
 - (iii) where that advice or information relates to the delivery of a Service for which the Member Company has been accredited by CREST.
- 2.7. “**CREST**” means CREST International and any or all of its group of companies and Regional Councils.
- 2.8. “**CREST Assessor**” means a person engaged by CREST to deliver and support the management of CREST certifications.
- 2.9. “**CREST Assignment**” means an assignment carried out by a CREST Member Company, utilising appropriately skilled persons. Note that if CREST is referenced in tender documentation but not in contractual documents, the contractual documents must identify this change and clarify the position.
- 2.10. “**CREST Internal Staff**” means any permanent, employed person within CREST.
- 2.11. “**Discipline**” includes, but is not limited to, Penetration Testing (including Web/Mobile App testing); and/or Intelligence-Led Testing/Red-Teaming; and/or Incident Response; and/or Threat Intelligence; and/or Security Operations Centres; and/or Vulnerability Assessment; and/or any other Disciplines as determined by CREST from time to time.
- 2.12. “**Employer**” means the company employing or engaging the Consultant.
- 2.13. “**Member Company**” means a company who has passed the relevant CREST requirements for membership and has achieved Accreditation to one or more Disciplines, agreed to the CREST Code of Conduct and has paid any fees associated with membership.

- 2.14. **“Member Company Application Form”** means the latest completed Application Form and associated reference material, reviewed and agreed by CREST as applicable. Any reports to a Company of minor compliance issues will also be considered as being part of the application.
- 2.15. **“Pathway Company”** or **“Pathway+ Company”** means an organisation that has successfully achieved either Pathway or Pathway+ status.
- 2.16. A **“Region”** means a group of countries in a relevant geographical area as determined by CREST from time to time.
- 2.17. **“Senior Management Team”** means the employed staff at CREST that comprise the senior leadership team.
- 2.18. **“Service”** in the context of this Code of Conduct includes, but is not limited to:
- (i) Penetration Testing; and/or
 - (ii) Threat-Led Penetration Testing; and/or
 - (iii) Incident Response; and/or
 - (iv) Incident Exercising; and/or
 - (v) Threat Intelligence; and/or
 - (vi) Security Architecture; and/or
 - (vii) Security Operations Centres; and/or
 - (viii) Vulnerability Assessment

3. Scope

3.1. In-Scope

- 3.1.1. The process below will be utilised for complaints received against a Member Company arising from a Client or potential Client or directly from CREST.

3.2. Out of Scope

- 3.2.1. The process below is not applicable to Pathway or Pathway+ companies.
- 3.2.2. Complainants should attempt to resolve issues with a Pathway or Pathway+ company directly with the company.
- 3.2.3. Complainants may provide feedback to CREST on their experience with a Pathway or Pathway+ company by emailing governance@crest-approved.org. Such feedback will be taken into consideration by CREST when reviewing the progress of a Pathway or Pathway+ company.

4. The Principles

- 4.1. Complaints will be investigated competently, diligently and impartially and assessed fairly, consistently and promptly at both the initial and final stages.
- 4.2. CREST aim to resolve complaints at the earliest opportunity and ensure Complainants are kept informed of the progress of their complaint. It is expected that most complaints should have been substantively addressed within eight weeks.

- 4.3 CREST undertake that no information revealed during an investigation conducted under this process will be made available any third parties including International or Regional Council Members. Additionally, the detail of any recommendations will not be made available to any third parties including CREST International Council and Regional Council Members unless to comply with Clauses 4.6 and/or 5.2.2 of this Complaints Handling Process.
- 4.4 Complainants should attempt to resolve their issues directly with the Member Company and should use the CREST Complaints Handling Process as a last resort and provided that reference to CREST has been made in connection with the complaint at any point.
- 4.5 CREST reserves the right to devolve investigation of any aspects of the complaint to the CREST Regional Council to which the Member Company under investigation is attached. Additional Non-Disclosure Agreements will be put in place if necessary.
- 4.6 This process may also be used to investigate incidents relating to CREST examinations in any Region. In these circumstances, only CREST Assessors necessary for the investigation will be involved along with the requisite CREST Internal Staff. CREST reserves the right to engage with the CREST Assessors' Representatives on the CREST International Council and Regional Council Members if it deems such action appropriate and proportionate. The wider Assessors group will not be advised of the detail unless it becomes necessary and/or appropriate based on any resultant recommendations.
- 4.7 Neither the Member Company nor the Complainant will be victimised or disadvantaged during the process and thereafter. All Parties will treat each other with respect throughout the investigation.
- 4.8 Complainants should be aware that where legal proceedings are launched or pending, which may include Tribunals, CREST is unlikely to be able to reach a final decision until such proceedings are concluded for risk of prejudicing either Party. In these circumstances, it may be possible for CREST to provide an interim "without prejudice" view if necessary if all Parties in the dispute are agreeable to such action.

5. The Process

5.1. Procedure

Complainants should, in the first instance, notify CREST of the general nature of their complaint or the incident. Such notification should be made via email to governance@crest-approved.org. On receipt of a potential complaint, CREST will register the relevant details and, based on the nature of the potential complaint or incident, will determine if any other individuals need to be involved in the investigation. The following procedure will then apply:

- 5.1.1. Acknowledgement of the receipt of the complaint will be sent to the Complainant within three working days.
- 5.1.2. The complaint will be investigated by the CREST Head of Governance & Legal and the investigation process will be overseen by the CEO of CREST.
- 5.1.3. CREST will decide if the documented Process to be applied is fit for purpose for the complaint received. Such decision will be based on the information provided by the Complainant. CREST reserves the right to develop an amended or bespoke process if the potential complaint warrants. Agreement from the Member Company and the Complainant to any amended or bespoke process will be secured (see also 5.5 below).
- 5.1.4. CREST will issue the Complainant with details of the complaint handling process and request that a formal complaint is provided in an agreed format. The Complainant will be advised that the Member Company must also agree to the process to be applied. If appropriate or necessary, CREST will issue or sign a non-disclosure agreement with the all the parties in question.

- 5.1.5. In parallel, CREST will issue a complaint notification to the Member Company and seek their agreement to the process to be applied for investigating the complaint.
- 5.1.6. CREST will review the complaint against the Code of Conduct for Companies and, where applicable, also against the Member Company Application Form, the Company Non-Disclosure Agreement (where signed) and if applicable against the Code of Conduct for Consultants Engaged in CREST Accredited Service delivery.
- 5.1.7. CREST reserves the right to require access to (i) the requisite evidence to support the investigation and (ii) where necessary, to the appropriate members of staff from the Member Company. Such access may take the form of a pre-arranged visit or remote interviews with personnel which would be supported by access to requisite documentation to be provided either in hard copy or by electronic means.
- 5.1.8. For Member Companies Accredited for SOC, CREST reserves the right to conduct an on-site audit.
- 5.1.9. CREST will then issue an initial viewpoint report to the Member Company.
- 5.1.10. On receipt of the CREST initial viewpoint report, the Member Company will deliver a formal response to the report and potential allegations together with evidence of procedures and policies.
- 5.1.11. CREST will review the evidence and will, where appropriate, agree a set of actions and dates for the actions to be completed by and a review process to ensure the actions have been completed. CREST will issue a Recommendation Report in confirmation.

5.2. Recommendation Review

- 5.2.1. Where necessary, CREST reserves the right to engage independently selected industry experts to review the recommendations. Industry experts will be selected based on their relevance, qualifications and impartiality and will be agreed by all parties (CREST, the Complainant and the Member Company) in advance of their appointment. Where deemed necessary, a separate and mutually agreed NDA will be signed by all parties involved. In this circumstance, the following additional steps will be taken:
 - (i) Experts will consider the CREST recommendations and either confirm them or agree amendments to them with CREST.
 - (ii) CREST will issue a Recommendation Report to the Member Company in question based on the experts' view of the recommendations.
 - (iii) Where appropriate, CREST may also issue a Recommendation Report, or extracts from it, to any Consultant(s) named in the complaint.
 - (iv) The Member Company will be given the opportunity to respond.
 - (v) CREST will agree the recommendations with the Member Company involved.
 - (vi) CREST will issue a summary of the Recommendation Report to the Complainant outlining the agreed recommendations, any timeframe for their application and the process for ensuring their application.
 - (vii) The recommendations will be enacted and appropriate steps taken to ensure the recommendations are fully complied with.
- 5.2.2. CREST may only provide details to relevant CREST International Council and Regional Council Members where the recommendation is
 - (i) that any Certificant's CREST qualification be revoked, and/or
 - (ii) that a Member Company be removed from membership of CREST, and/or
 - (iii) CREST becomes directly involved in legal action.

In these circumstances, an additional and mutually agreed NDA specific to the complaint will be required to be signed by all members of the Councils.

- 5.2.3. CREST will then give formal notice to the Complainant when the complaint resolution process is concluded and seek their agreement to close the complaint.
- 5.2.4. CREST will advise the Member Company when the complaint has been closed.
- 5.2.5. CREST reserves the right to advise appropriate third parties as necessary if a decision is taken in line with the recommendations at 5.2.2. The Member Company will be advised if this action is to be taken. Third party representatives may be requested to sign a specific NDA relating to the decision if necessary.

5.3. Right of Appeal

If the recommendation to revoke a CREST qualification from a Certificant and/or suspend or remove a Member Company from membership of CREST, the Certificant and/or the Company will have the right of appeal to the CREST International Council. The Senior Management Team involved in the original decision will not participate in such an appeal.

6. Amendment List

This document has been amended in the areas described below:

a. Section reference b. Clause Reference c. Date Issued	Description of Changes	Authorised by	Version No. issued
a. Throughout b. c. 18.12.2023	Definitions (“CREST” & “Region”) clarified. Reference to Chapters replaced with Regional Council	Elaine A Luck	10
a. N/A b. c.	Telephone number removed from back page	Elaine A Luck	11
a. Throughout b. c. 28.08.2024	Definition of and reference to “Individual” removed	Elaine A Luck	12
a. 2 b. c. 28.08.2024	Pathway and Pathway+ companies added to Definitions and.	Elaine A Luck	12
a. 3 b. 3.2(new) c. 28.08.2024	Pathway and Pathway+ companies referenced in new Out of Scope clause	Elaine A Luck	12
a. 5 b. 5.2.5 c. 18.09.2025	Cross reference corrected	Elaine A Luck	13
a. b. c.			



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