Reopened files — 41 closures citing an unattached record

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29 records found, 9 requests drafted, 3 undetermined · fictional document

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> **Fictional document**, produced for the demonstration. Company, funds, unitholders and people are invented. **Nothing is written into any real system**, and **none of the 41 files has been reopened in the client's own tool**: the reopening is worked up here and awaits the head of compliance's decision.

What the sorting produced

Situation	Files	What has been prepared	What is left to decide
Record found and attached	**29**	**Record attached to the file with its deposit date**	Review and closure by the head of compliance
Record to be requested	**9**	**Request drafted on the company's letterhead, ready to go**	Signature and sending by unitholder services

Situation	Files	What has been prepared	What is left to decide
Record cited that does not exist	**3**	**File held as undetermined, with what would settle it**	Judgement of the head of compliance
Total	**41**	—	—

The nine records to be requested, in detail

Missing record	Files	Where it normally sits	Request drafted
Source-of-funds evidence	**7**	Unitholder or financial investment adviser	**Yes — one per file, personalised**
Renewed identity document	2	Unitholder	**Yes**

The three files held as undetermined

For these three, the record cited at closure never existed: it was mentioned from memory. **The file stays open, with the exact item that would settle it** — for two of them, written confirmation from the adviser on the source of funds; for the third, the statement of the destination account. **A file that cannot be assessed is not a file without risk**, and leaving it undetermined makes it visible rather than reassuring.

The rule proposed, and what it would have produced

“Any record cited is attached to the file, or its absence is written down together with what would lift it.” Applied to the 118 vigilance files of the previous year, it would have stopped all 41 **before** they were closed, at the point when the record was still easy to find. It adds no data entry: the check runs on the file as written, the second closure is requested.

Decision awaited: Head of compliance and internal control — reopen, close or hold as undetermined

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External writes: 0 — no file reopened in the client's own tool

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