

Money Laundering – Acceptable documentation for identification of new members

Note that we have a legal duty to identify new members and we should not be apologetic or embarrassed in politely but firmly applying the procedures below.

The Money Laundering Regulations make it clear that organisations should adopt a risk-based approach to confirming the identity of individuals. The following is therefore not an exhaustive list but collectors enrolling new members should refer to the office before accepting evidence which does not appear below.

We should obtain the following information in relation to any individual seeking to join:

Full name

Residential address, and

Date of birth

Information should be based on reliable and independent sources.

We should see two documents, one of which has been issued by a government department and, where possible, should include a photograph of the individual. The other should have been issued by a government department, by another FSA regulated organisation or by a regulated utility company. We should see **one document from list A and a second from list B, provided that between them they show all the details set out above (full name, residential address and date of birth)**. Originals should be copied and the copy certified by the collector “Original seen”, initialled and annotated with the name of the collector and the date. **Documents printed off the internet are not acceptable.**

List A	List B
Valid, current passport	A second document from list A
Valid, current photocard driving licence (full or provisional)	Current Council Tax demand letter, or statement
National identity card (for non-UK nationals)	Current bank statement
Firearms certificate or shotgun licence	Current credit card statement
Valid, old-style UK driving licence	Current utility bill
Recent evidence of entitlement to a state or local authority-funded benefit, including: Housing benefit, Council tax benefit, Tax credit, Pension, Educational or other statutory grant	Current tenancy agreement in their name (copy the pages the showing address of the property and the name of the tenant)

Current means issued in the last three months. Note, however, that Council Tax demands may be up to a year old (they are issued annually in March).

The regulations recognise that certain individuals, particularly the financially excluded, may not be able to provide the above documentation in full but that they should not therefore be prevented from joining. In these circumstances, but **only in these circumstances** the procedures set out overleaf may be adopted.

Non-standard cases

Some, but not all, low income individuals, minors, students, refugees, asylum seekers, migrant workers and ex-prisoners may not be able to provide the standard documentation noted overleaf.

Before accepting alternative evidence, the collector should note the reason for the non-availability of standard documentation at the foot of page two on the application form.

In all circumstances it will still be necessary to have documentary evidence of an applicant's full name, residential address and date of birth but, in the exceptional cases where standard documentation is not available, it should be possible to find acceptable alternatives.

The following documentation may be accepted as evidence without referral to the office in cases where the collector is satisfied that the applicant falls into one of the categories above and that they genuinely cannot produce the standard documentation; all other cases should be referred**.

Category of applicant	Acceptable evidence
Low income individual	Standard evidence should be available (e.g. benefit statement and utility bill)
Individual in care home, sheltered accommodation, hostel or refuge	Letter from manager or warden* (see below)
Individual on probation	Letter from probation officer* (see below)
Minor	Letter from school* (see below) with all relevant details. NOTE Where parent/sponsor is not a member they should also be identified in the normal way
College or University student (16+)	At least one standard document likely to be available but can be supplemented by letter from college* (see below) with all relevant details
International student	Valid passport or EEA ID Card AND letter of acceptance from recognised educational institution (if in doubt refer to office)
Refugees	Immigration Status Document, with Residence permit or IND travel document
Asylum seeker	IND Application Registration Card (ARC) NOTE If applicant is working, this must show individual is entitled to work here, and it may need to be supplemented by another document to give all necessary details

*Letters should be on relevant headed paper and have an original signature. The applicant should be told that we may contact the person who has signed it.

If the collector has recently visited the home of the prospective member, for example because they are known to them personally, this will be adequate proof of address provided this is documented.

No-one should be turned away outright without a full discussion with the applicant of what evidence might be available. Take contact details of the applicant and pass to the office with the application form and the office will make contact directly but **do not issue pass book.