WHITEHALL

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Evidence of Identity Guideline

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2. Introduction

Financial crime such as fraud, money laundering, evading financial sanctions and terrorist financing does enormous damage to society. Tackling financial crime involves a collective effort including us as a regulated firm.

The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 require appropriate identity (ID) evidence to be provided when certain transactions take place.

As part of our measures to comply with regulations and make our contribution to combat financial crime, we must obtain evidence of identity for all parties with whom we do business. This includes individuals, companies, other pension schemes and trusts. We also need to know the source of funds paid into and out of pension schemes we operate and may need to ask detailed questions and ask for appropriate evidence.

This guideline summarises the identity documents and information we need to obtain from you.

3. Evidence of Identity for an Individual

We will need at least one item from each of the following two lists. These should either be originals or copies certified as true copies by a solicitor, accountant or financial adviser.

Evidence of Identity for an Adult

Evidence of Identity	**Proof of Address**
Current signed passport	Utility bill (gas, electric, telephone landline, satellite TV) issued within the last three months. Mobile 'phone bills are **not** acceptable
Full UK or EEA photocard driving licence (not provisional)	Mortgage statement from a recognised lender for the last full year
Residence permit issued by the Home Office to EU Nationals on sight of their own country's passport	Council tax bill for the current council tax year
Benefit book or notification letter from the Benefits Agency confirming the right to benefits	Bank or building society statement issued within the last three months
Firearms certificate	A solicitor's letter issued within the last three months, confirming a recent house purchase

We will also carry out an online verification of identity check for individuals using a recognised platform. Our application forms include your consent for us to carry out an online check.

Evidence of Identity for a Minor (e.g. a beneficiary of benefits on death)

Evidence of Identity	**Proof of Address**
Birth Certificate	Official letter from a government agency addressed to the child
Passport	Letter (or paperwork), from an issuing body of student/age cards, which confirms the address of the child; (for example, a letter from the issuing body to the child and in respect of their identity or age; or a specific letter confirming their address)
Student Card	If the legal guardian cannot provide the either of the above documents, we must have the following

Age card (with photograph and signature)	The identity and address of one parent or legal guardian should be verified

Please note, certified documents must not be certified by a close family member or anyone who has any perceived, potential, or apparent conflict of interest with the individual.

Identity Verification Certificates

Where evidence of identity for an individual is being provided by a Financial Adviser, we are happy to accept a completed Identity Verification Certificate. This must be signed by an FCA authorised individual and certified copies of the documents used to identify the individual accompany the certificate.

4. Evidence of Identity for a Company

For UK registered companies and limited liability partnerships (LLPs), we can obtain most of our requirements from Companies House. We will access and save copies of certificates of incorporation, company returns, company accounts, details of trading status, directors and ultimate beneficial owners (individuals who own 25% or more of the shareholding).

For a partnership that is not an LLP we will need a certified copy of the Partnership Agreement.

We will also require certified evidence of identity for the directors and ultimate beneficial owners (if different) of the company.

We carry out online verification of identity checks on the directors and ultimate beneficial owners.

For an overseas company we can carry out online verification checks and may also request additional certified documentation for the company, directors and shareholders.

5. Foreign Nationals

We require evidence of identity and proof of address as detailed above.

Certification of copy documents should read 'Certified as a true copy of the original document (and that the photograph is a true likeness of the individual seen at the same time as the original document)'.

A lawyer, attorney, embassy official, consulate or high commissioner of the country of issue must certify passports, identity cards and documentary evidence of address.

For an overseas company we can carry out an online verification check but will need certified copies of the equivalent of the certificate of incorporation, latest company return and latest company accounts.

We will also need certified evidence of identity for the directors and ultimate beneficial owners.

6. Source of Funds and Source of Wealth

Our application forms ask for details of the source of funds and source of wealth from which payments are made to pension schemes operated by us.

We also ask for evidence of source of funds. The evidence required depends on where the funds are coming-from:

Source of Funds	**Evidence Required**
Company Contributions	Company bank statement

Individual contributions	Personal bank statement
Pension transfers	Valuation or statement from the transferring provider
Contributions that exceed expected amount	Copy of original source of funds e.g. inheritance, surrender of investment account, divorce settlement

We may need to ask for additional information in connection with this.

7. Other Pension Schemes

When paying pension transfers to other pension schemes, we will need evidence that the receiving scheme is a legitimate registered scheme. We ask the receiving scheme for the following:

HMRC screen print of registered scheme details
Copy FCA registration for personal pensions and SIPPs
Copy trust deed for trust-based schemes
Certified evidence of identity for trustees of trust-based schemes
Copy bank statement for the receiving account
For overseas schemes a copy of the HMRC Qualifying Recognised Overseas Pension Scheme certificate

8. Trusts and Powers of Attorney

Where death benefits are paid from a penison scheme we operate to a trust, or an arrorney is appointed to act on behalf of a member or pension scheme trustee, we need the following evidence to identify the trust or Power of Attorney:

A certified copy of the trust deed or Power of Attorney
Certified evidence of identity for the trustees or attorney(ies) (as outlined above for individuals and companies)
A bank statement for the receiving account

Please note that if you are unable or unwilling to provide our requirements as outlined above, we may not be able to act for you, accept payments from or make payments to the entities requested.

We take our responsibiities to combat financial crime very seriously.

If you have any queries regarding these guidelines, please get in touch.

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