9. NON FACE-TO-FACE IDENTIFICATION

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9.1 Introduction
Non-face-to-face identification applies to any private customer who is not providing you with Verification of Identity documentation in person.

9.2 Non Face-to-Face Verification Using Documentation
When you are required to verify a customer's identity this must always be completed via the electronic ID system URU.

The ID verification must be completed following the URU procedures available on the Intrinsic Extranet system and must be completed before an application is submitted to a lender or product provider. Failure to follow this requirement will be considered a serious breach of the Sales Process.

Whenever verification of identity is required you must retain either:
- a copy of the URU results showing a PASS decision
- a copy of the email confirming a concession has been logged by the Financial Crime Team

9.3 Non Face-to-Face Verification Using Documentation
As above you must verify all customer identity through the URU system prior to submitting an application.

In some cases you may also be required to obtain sight of documentation to prove the client's name and address by relying on an appropriate third-party to verify and certify documentation (see Section 7).

9.4 Receiving Documents By Post
It is not acceptable in any circumstance to verify a client’s identity using documentation when you have never met them. Doing so is a criminal offence and would be considered as a serious disciplinary matter that may lead to your contract with Intrinsic being terminated.

Therefore the need to receive original identification documents by post should be very limited. Doing so creates a risk that the documents may be lost in either your possession or in the post, which may lead to the client’s identity being stolen, cloned or impersonated.

Should you feel that a particular case warrants or requires a client’s original identification documents to be sent to you by the post then you must refer this in advance to Intrinsic’s Financial Crime Team. Any approval to follow this process will be on the strict understanding that the client acknowledges the risks associated with such a process.
9.5 Certification of Documentation
For non-face to face business it is required that you follow the procedures outlined in Section 7 - “Reliance on others to complete verification”

Copies of identification evidence should be dated and signed “original seen” by the individual who carried out the certification. If the identification evidence includes a photograph the wording should also state “the photograph provides a good likeness of the applicant” (or similar suitable wording).

The documentation must be accompanied by contact details for the individual who made the certification.

On receipt of the certified documentation you should contact the individual who made the certification to confirm that they have seen the original documents. This contact may be made by telephone but you should record that you have done so.

In all non-face to face business, the additional checks outlined below should also be carried out.

9.6 Additional Requirements to Guard Against Identity Fraud
Where non face-to-face business is being transacted you must make an additional check to guard against identity fraud. One of the following checks would be acceptable for this purpose:

- if the initial cheque is drawn on a personal account in the applicant’s name at a UK bank or building society this in itself will be sufficient to provide the additional check and no further action need be taken (this is likely to be the method most regularly employed); or
- by mailing the application documents to an independently verified address. Independent verification of address can be obtained by carrying out a check of the electoral role. An on-line check of the electoral roll (available at www.192.com) would be acceptable for this purpose.

Should neither of the above routes be applicable then you should ensure that you make a “welcome telephone call” to the applicant prior to transacting business. The call should be made to an independently verified home or business number. You should ensure, as part of this call, that you request the customer to confirm a minimum of two pieces of personal identity (security) information that have been previously provided during the transaction process e.g. by asking them to confirm the date of birth and postcode as provided on the application.

For internet business sign-on using verification procedures, use security codes, tokens and/or other passwords which were provided by hard post, or secure delivery, to the named individual at an independently verified address will suffice to demonstrate that the verified individual is the person with whom you are dealing.
9.7 Extra Guidance for Non-Face-to-Face Transactions with Non-UK residents

Non-face-to-face transactions with non UK residents pose a very significant money laundering risk and it is therefore recommended that you contact the Money Laundering Reporting Officer for guidance should such circumstances arise.