



BRIEFING PAPER

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Bank accounts: problems of identification

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Summary

This note gives practical guidance which Members may like to convey to constituents who find that their application for a bank account is refused. More detail on the general legislative background and policy comment should also see standard note *Money Laundering Regulations SN/BT/2592* available on the intranet.

Opening a bank account has become harder rather than easier over the past few years as the banks have responded to fines in the \$billions for money laundering failures from regulators (mainly in the United States). This has come to be known as 'de-risking'.

The main guidance comes from an international body – the Joint Money Laundering Service which is regularly updated. This note reflects the 2014 guidance.

If individuals find that they are initially refused a bank account they should either try other banks or ask to speak to the branch (or higher) money laundering officer.

The Appendix to the paper includes two lists of acceptable identification for 'special cases'.

1. Introduction

Ever since legislation was introduced in this country to counter money laundering some individuals have encountered problems when they apply for a bank account. For some their lack of key identification documents has resulted in their applications being refused. The groups affected cover a broad spectrum of the public but mainly concentrate on the elderly, those from abroad, or the homeless and transient (for whatever reason).

The current backdrop to this is now, frankly, difficult for individuals. Opening a bank account has become harder rather than easier over the past few years as the banks have responded to fines in the \$billions for money laundering failures from regulators (mainly in the United States). This has come to be known as 'de-risking'.

This was touched on in a session of the Treasury Select Committee when the Financial Conduct Authority (FCA) Chairman was asked a number of questions about AML and people's access to bank accounts. This can be found [here](#).¹

There is in effect something of a stand-off between regulators and the regulated both here and in the US. In the UK the FCA position is shown below. It seems to indicate that at some stage it will seek to make the sort of wholesale de-risking which banks have carried out a regulatory issue, i.e. it might force them to provide services, but it is a complex matter. It says:

We require banks to put in place and maintain policies and procedures to identify, assess and manage money-laundering risk. These policies and procedures must be comprehensive and proportionate to the nature, scale and complexity of the bank's activities.[...]. This requires banks to use judgement and common sense and is what we would regard as an effective risk-based approach.

Where a bank does not believe that it can manage the money-laundering risk associated with a business relationship effectively, it should not enter into, or maintain, that business relationship. But the risk-based approach does not require banks to deal generically with whole categories of customers or potential customers: instead, we expect banks to recognise that the risk associated with different individual business relationships within a single broad category varies, and to manage that risk appropriately.

While the decision to accept or maintain a business relationship is ultimately a commercial one for the bank, we think that there should be relatively few cases where it is necessary to decline business relationships solely because of anti-money laundering requirements. As a result, we now consider during our AML work whether firms' derisking strategies give rise to consumer protection and/or competition issues.²

¹ Treasury Select Committee 9 September 2014, Q21 on

² [FCA Statement 27 April 2015](#)

2. Legal AML requirements.

The current regulations were made under the [Proceeds of Crime Act 2002](#), which consolidated various money laundering offences. They have been amended at various stages due to European directives and the guiding legislation is now [The Money Laundering Regulations 2007 \(SI 2007/2157\)](#). These regulations were themselves amended by Regulations in 2012 – the [Money Laundering \(Amendment\) Regulations 2012 \(SI 2012/2298\)](#).

Under the Regulations it is an offence to form a business relationship (in this case to open a bank³ account) in the course of 'relevant financial business' unless identification procedures have been carried out. Those procedures must ensure that new business applicants produce satisfactory evidence of their identity.

On the question of what evidence of identity is satisfactory, Regulation 5 states:

5. "Customer due diligence measures" means—

(a) identifying the customer and verifying the customer's identity on the basis of documents, data or information obtained from a reliable and independent source;

(b) identifying, where there is a beneficial owner who is not the customer, the beneficial owner and taking adequate measures, on a risk-sensitive basis, to verify his identity so that the relevant person is satisfied that he knows who the beneficial owner is, including, in the case of a legal person, trust or similar legal arrangement, measures to understand the ownership and control structure of the person, trust or arrangement; and

(c) obtaining information on the purpose and intended nature of the business relationship.

The regulation does not stipulate specific documents. Each financial institution therefore, may decide what evidence it requires before it considers that satisfactory proof of identity has been given in order for it to discharge its legal obligation. Failure to meet these requirements can lead to a two year prison term or a fine or both. This may partly explain the inflexible attitude of bank staff which is common in these problem cases.

³ All references to 'bank' include building societies and other deposit taking institutions.

3. Evidential requirements

Financial institutions need to have evidence to show that they have met the legal requirements set out in the previous section.

Normally, separate items of identity (i.e. that the individual is who he or she claims to be) and address are sought. Where there is no face to face contact, identity requirements are likely to be stricter, and more documentation may be asked for.

Various bodies publish lists of what is required before accounts can be opened. Most of these lists combine to a degree legal requirements and practical assessments of risk. Most of them provide minimum standards and examples of what would typically meet that standard.

Many of the problems encountered in branches result from where the standard information is not available and where the latitude given in certain standards is not then used by branch staff.

3.1 Joint Money Laundering Steering Group Guidance

At the top of the guidance 'family' is that from the Joint Money Laundering Steering Group (JMLSG). The sector wide guidance was last published in November 2014. The overall framework is that verification standards should reflect the risk of money laundering. This might reflect either the type of transaction or the person doing it. JMLSG includes the following examples of higher risk activity:

When the applicant is a PEP [Politically Exposed Person].

When there is no face-to-face contact with the applicant. An additional check is needed to offset the increased risk, notably that of impersonation fraud (see Part I, paragraph 5.3.71).

When the business, or other aspect, of the customer relationship is considered to present a higher risk of money laundering or terrorist financing. Examples should be set out in the firm's risk-based approach and should reflect the firm's own experience and information produced by the authorities. See Part I, paragraphs 3.25 – 3.27 and section 5.5 for general guidance.

When establishing a correspondent banking relationship with an institution in a non-EEA state, (although in practice most firms would not regard such relationships as forming part of their 'retail' business).⁴

And examples of higher risk activity or sectors:

High cash turnover businesses: casinos, bars, clubs, taxi firms, laundrettes, takeaway restaurants

⁴ JMLSG [Guidance \(PtII\)](#) page 10, November 2014

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Money service businesses: cheque encashment agencies, bureaux de change, money transmitters

Gaming and gambling businesses

Computer/high technology/telecom/mobile phone sales and distribution, noting especially the high propensity of this sector to VAT 'Carousel' fraud

Companies registered in one offshore jurisdiction as a non-resident company with no local operations but managed out of another, or where a company is registered in a high risk jurisdiction, or where beneficial owners with significant interests in the company are resident in a high risk jurisdiction

Unregistered charities based or headquartered outside the UK, 'foundations', cultural associations and the like, particularly if centred on certain target groups, including specific ethnic communities, whether based in or outside the UK (see FATF Typologies Report 2003/4 under 'Non-profit organisations' – at www.fatf-gafi.org)⁵

Activity in either, or in combination of the above requires *enhanced* due diligence. JMLSG gives the management of banks latitude in how they make their risk assessments:

Senior management should decide on the appropriate approach in the light of the firm's structure. The firm may adopt an approach that starts at the business area level, or one that starts from business streams. Taking account of any geographical considerations relating to the customer, or the transaction, the firm may start with its customer assessments, and overlay these assessments with the product and delivery channel risks; or it may choose an approach that starts with the product risk, with the overlay being the customer and delivery channel risks.⁶

The Basel Committee on Banking Supervision published a consultation document in July 2015 – [General guide to account opening](#). It covers most of the ground in the JMLSG guidance.

The rest of this note deals with standard cases.

Standard evidence

Key sections of its guidance (concentrating on individuals rather than businesses) are shown below:

5.3.61 If documentary evidence of an individual's identity is to provide a high level of confidence, it will typically have been issued by a government department or agency, or by a court, because there is a greater likelihood that the authorities will have checked the existence and characteristics of the persons concerned. In cases where such documentary evidence of identity may not be available to an individual, other evidence of identity may give the firm reasonable confidence in the customer's identity, although the firm should weigh these against the risks involved.

5.3.62 Non-government-issued documentary evidence complementing identity should normally only be accepted if it

⁵ JMLSG [Guidance \(PtII\)](#) page 10, November 2014

⁶ [JMLSG Guidance](#) page 42; November 2014

originates from a public sector body or another regulated financial services firm, or is supplemented by knowledge that the firm has of the person or entity, which it has documented.

5.3.63 If identity is to be verified from documents, this should be based on:

- Either a government-issued document which incorporates:
- the customer's full name and photograph, and
- either his residential address
- or his date of birth.⁷

The guidance then lists the standard sorts of documents which will suffice.

Government-issued documents with a photograph include:

- Valid passport
- Valid photocard driving licence (full or provisional)
- National Identity card
- Firearms certificate or shotgun licence
- Identity card issued by the Electoral Office for Northern Ireland⁸

And

Government-issued documents without a photograph include:

Valid (old style) full UK driving licence

Recent evidence of entitlement to a state or local authority-funded benefit (including housing benefit and council tax benefit), tax credit, pension, educational or other grant

And

Other documents include:

Instrument of a court appointment (such as liquidator, or grant of probate)

Current council tax demand letter, or statement

Current bank statements, or credit/debit card statements, issued by a regulated financial sector firm in the UK, EU or an equivalent jurisdiction (but not ones printed off the internet)

Utility bills (but not ones printed off the internet)

The list of documents suggested as being acceptable for 'special cases' can be found in Annex 1-I (Part II, p13) of the new JMSL sectoral guidance for retail banks. It can be found in Appendix 2 of this Paper

Note the guidance is under review. A consultation ended in April 2017 and the new guidance has not yet been published. More detail on this can be found [here](#)

⁷ [JMLSG Guidance](#) November 2014

⁸ [JMLSG Guidance](#) November 2014

Non-standard evidence

The key section of guidance in respect to many constituency problems is the section on where standard evidence is not available. This is shown below. What is noticeable is the degree of latitude given in many non-standard cases – a latitude often not exploited in-branch:

Customers who cannot provide the standard evidence

5.3.88 Some customers may not be able to produce identification information equivalent to the standard. Such cases may include, for example, some low-income customers in rented accommodation, customers with a legal, mental or physical inability to manage their affairs, individuals dependent on the care of others, dependant spouses/partners or minors, students, refugees and asylum seekers, migrant workers and prisoners. The firm will therefore need an approach that compensates for the difficulties that such customers may face in providing the standard evidence of identity.

Promoting Financial Inclusion, December 2004

5.3.89 The FCA Rules (SYSC 6.3.7 (5)) adopt a broad view of financial exclusion, in terms of ensuring that, where people cannot reasonably be expected to produce standard evidence of identity, they are not unreasonably denied access to financial services. The term is sometimes used in a narrower sense, for example, HM Treasury refers to those who, for specific reasons, do not have access to mainstream banking or financial services - that is, those at the lower end of income distribution who are socially/financially disadvantaged and in receipt of benefits, or those who chose not to seek access to financial products because they believed that they will be refused.

5.3.90 Firms offering financial services directed at the financially aware may wish to consider whether any apparent inability to produce standard levels of identification evidence is consistent with the targeted market for these products.

5.3.91 As a first step, before concluding that a customer cannot produce evidence of identity, firms will have established that the guidance on initial identity checks for private individuals set out in paragraphs 5.3.59 to 5.3.87 cannot reasonably be applied.

5.3.92 The guidance at paragraph 5.3.63 does not require that in all cases a customer's address should be verified – the standard verification is verification of name and a choice between verifying address or date of birth. Providing the standard evidence of address can be a particular difficulty for many new arrivals to the UK, and firms should have regard to this fact in deciding whether, in particular cases, to insist on address verification, and if so, how this might be satisfied.

5.3.93 Guidance on verifying the identity of most categories of customers who cannot provide the standard evidence is given in Part II, sector 1: Retail banking. Guidance on cases with more general application is given in paragraphs 5.3.95 to 5.3.105.

5.3.94 Where a firm concludes that an individual customer cannot reasonably meet the standard identification requirement, and that the provisions in Part II, sector 1: Retail banking, Annex 1-I, cannot be met, it may accept as identification evidence a letter or

statement from an appropriate person who knows the individual, that indicates that the person is who he says he is.⁹

The Guidance continues with commentary on specific groups. (Readers can click on the headings to go to the relevant section in the Appendix of this Paper for details).

[Persons without standard documents, in care homes, or in receipt of pension](#)

[Those without the capacity to manage their financial affairs](#)

[Gender reassignment](#)

[Students and young people](#)

[Financially excluded](#)

The British Bankers Authority (BBA) produce a number of leaflets designed to provide accessible advice to consumers generally or to particular groups:¹⁰

[Proving your identity](#)

[Banking for people who lack capacity to make decisions \(Scotland\)](#)

[Opening a bank account if you are new or returning to the UK](#)

As part of the Banking Code, banks are required to state clearly what documentation they accept. A survey, from a sample of banks' websites, of accepted forms of identification shows a wide variation between the banks:¹¹

⁹ [JMLSG Guidance](#) November 2014

¹⁰ [BBA website](#)

¹¹ Note survey compiled 2010

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Accepted identification

	Barclays	HSBC	Nat- West	Nation- wide
Identity				
Full passport	yes	yes	yes	yes
European Union National Identity Card	yes	yes		yes
UK photocard driving licence or UK full paper driving licence	yes	yes	yes	yes
UK Armed Forces ID card.	yes		yes	
Inland Revenue tax notification of benefits, coding or tax due		yes		yes
Police warrant card			yes	
Construction industry CIS4 & 6			yes	
Firearms or shotgun certificate			yes	
Current student identification card			yes	
Benefits agency book or notification of right to benefit			yes	yes
OAP travel pass			yes	
Disabled drivers pass			yes	
NHS medical card	(2)		yes	
Birth/adoption certificate	(2)		yes	yes
Provisional driving licence	(2)		yes	
Bank or building society statement with credit or cheque guarantee card				yes
Address				
UK photocard driving licence or UK full paper driving licence.	yes		yes	
Gas bill (less than three months old) with evidence that the bill has been paid.	(1) yes	yes	yes	yes
Water bill (less than 3 or 12 months old) with evidence that the bill has been paid.	(1) yes	yes	yes	yes
Telephone bill for a fixed line, not a mobile (less than three months old).	(1) yes	yes	yes	yes
Local authority (council) tax bill (less than three months old).	yes	yes	yes	yes
Bank statement (within recent past) from another bank.	yes	yes		
Bank credit card statement			yes	
Mortgage statement (less than 12 months old).	yes		yes	
Inland Revenue notice of tax coding (current tax year), or other notifications	yes	yes	yes	
European Union National Identity Card		yes		
Benefits agency book or notification of right to benefit			yes	
Current home or motor insurance			yes	

Note 1) In case of Barclays the bill must have been paid too.

2) for applicants 20 years old or under only.

Source: Company websites

4. What to do if you don't have the right documents?

If there is an ID deficiency and the application is declined, it is important for the constituent not to simply 'give up'. The Government, through the FCA has as a policy goal the eradication as far as possible, of financial exclusion – where mainly poorer sections of society do not have access to things like bank accounts, loans or overdrafts. This conflict between policing of new accounts and encouragement of more accounts through various ways, including for example, government paying many social benefits through a bank, is at the core of the difficulties being experienced.

The JMLSG guidance includes the following statement:

Where an applicant produces non-standard documentation, staff should be discouraged from citing the ML Regulations as an excuse for not opening an account without giving proper consideration to the evidence available, referring up the line for advice as necessary. It may be that at the conclusion of that process a considered judgement may properly be made that the evidence available does not provide a sufficient level of confidence that the applicant is who he claims to be, in which event a decision not to open the account would be fully justified. Firms should bear in mind that the ML Regulations are not explicit as to what is and is not acceptable evidence of identity.¹²

In a previous (2006) edition of JMLSG the following paragraph appeared:

4.111. It would be very helpful to an applicant when they are refused an account to ask the staff for a meeting with the branch '**money laundering reporting officer**'. It is their job to make decisions in non-standard cases and the guidance notes above quoted to this person could form the basis of a discussion.

This would still seem to be the best advice on a general basis for constituents.

¹² [JMLSG Guidance](#) November 2014

Appendix 1: guidance on special groups

Persons without standard documents, in care homes, or in receipt of pension

5.3.95 An entitlement letter from the DWP, or a letter from the DWP confirming that the person is in receipt of a pension, could provide evidence of identity. If this is not available, or is inappropriate, a letter from an appropriate person, for example, the matron of a care home, may provide the necessary evidence.

Those without the capacity to manage their financial affairs

5.3.96 Guidance on dealing with customers who lack capacity to manage their affairs, such as the mentally incapacitated, or people with learning difficulties, covering Powers of Attorney; Receivership (or short order; and Appointeeship, are set out in a BBA leaflet, "Banking for people who lack capacity to make decisions", which can be obtained from the British Bankers' Association at www.bba.org.uk. (see also paragraphs 5.3.77 – 5.3.81)

Gender reassignment

5.3.97 A firm should satisfy itself (for example, on the basis of documentary medical evidence) that the gender transfer of a customer is genuine (as with a change of name). Such cases usually involve transferring a credit history to a reassigned gender. This involves data protection, not money laundering issues. The consent of the person involved is necessary.

Students and young people

5.3.98 When opening accounts for students or other young people, the standard identification requirement should be followed as far as possible (see paragraphs 5.3.59 – 5.3.87). In practice, it is likely that many students, and other young people, will have a passport, and possibly a driving licence. Where the standard requirement would not be relevant, however, or where the customer cannot satisfactorily meet this, other evidence could be obtained by obtaining appropriate confirmation(s) from the applicant's workplace, school, college, university or care institution (see UK Border Agency website <http://www.bia.homeoffice.gov.uk/employers/points/sponsoringmigrant/registerofsponsors/> and Part II, sector 1: Retail banking, Annex 1-I).

Any confirmatory letter should be on appropriately headed notepaper; in assessing the strength of such confirmation, firms should have regard to the period of existence of the educational or other institution involved, and whether it is subject to some form of regulatory oversight. UCAS also maintain a database of students who have confirmed places at a University/Higher Education establishment, which is accessible on subscription (see www.ucasmedia.co.uk/).

5.3.99 All international students, other than those from EEA countries or Switzerland, undergo rigorous checks by the immigration services at home and abroad in order to be satisfied as to their identity and bona fides before they are given leave to enter or remain in the UK as a student or prospective student. Applicants must meet the requirements of the Student Immigration Rules and must provide documentation which demonstrates that they intend to study, and have been accepted, on a course of study at a bona fide institution. This includes the provision of a course admission letter from the education institution. If they cannot provide the documents they will not be given leave to enter or remain in the UK.

5.3.100 Often, a business relationship in respect of a minor will be established by a family member or guardian. In cases where the adult opening the account or establishing the relationship does not already have an existing relationship with the firm, the identity of that adult should be verified and, in addition, the firm should see one of the following in the name of the child:

birth certificate

passport

NHS Medical Card

Child benefit documentation

Child Tax Credit documentation

National Insurance Card (for those aged 16 and over)

Financially excluded

5.3.101 Further guidance on verifying the identity of financially excluded persons is given in Part II, sector 1: Retail banking, paragraphs 1.38 – 1.41. A proportionate and risk-based approach will be needed to determine whether the evidence available gives reasonable confidence as to the identity of a customer.

5.3.102 Where a firm has concluded that it should treat a customer as financially excluded for the purposes of customer identification, and the customer is identified by means other than standard evidence, the reasons for doing so should be documented.

5.3.103 The “financially excluded” are not a homogeneous category of uniform risk. Some financially excluded persons may represent a higher risk of money laundering regardless of whether they provide standard or non-standard tokens to confirm their identity, e.g., a passport holder who qualifies only for a basic account on credit grounds. Firms may wish to consider whether enhanced due diligence (see section 5.5) or monitoring (see section 5.7) of the size and expected volume of transactions would be useful in respect of some financially excluded categories, based on the firm’s own experience of their operation.

5.3.104 In other cases, where the available evidence of identity is limited, and the firm judges that the individual cannot reasonably be expected to provide more, but that the business relationship should nevertheless go ahead, it should consider instituting enhanced

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monitoring arrangements over the customer's transactions and activity (see section 5.7). In addition, the firm should consider whether restrictions should be placed on the customer's ability to migrate to other, higher risk products or services.

5.3.105 Where an applicant produces non-standard documentation, staff should be discouraged from citing the ML Regulations as an excuse for not opening an account without giving proper consideration to the evidence available, referring up the line for advice as necessary. It may be that at the conclusion of that process a considered judgement may properly be made that the evidence available does not provide a sufficient level of confidence that the applicant is who he claims to be, in which event a decision not to open the account would be fully justified. Firms should bear in mind that the ML Regulations are not explicit as to what is and is not acceptable evidence of identity.

Appendix 2: identification for special cases

From JMLSG PT II p13

Special Cases

Many customers in the categories below will be able to provide standard documents, and this will normally be a firm's preferred option. This annex is a non-exhaustive and non-mandatory list of documents (see Notes) which are capable of evidencing identity for special cases who either cannot meet the standard verification requirement, or have experienced difficulties in the past when seeking to open accounts, and which will generally be appropriate for opening a Basic Bank Account. These include:

Customer

Benefit claimants

Documents

Entitlement letter issued by DWP, HMRC or local authority, or

Identity Confirmation Letter issued by DWP or local authority

Those in care homes/sheltered accommodation/refuge

Letter from care home manager/warden of sheltered accommodation or refuge

Homeless persons who cannot provide standard identification documentation are likely to be in a particular socially excluded category. A letter from the warden of a homeless shelter, or from an employer if the customer is in work, will normally be sufficient evidence.

Those on probation

It may be possible to apply standard identification procedures. Otherwise, a letter from the customer's probation officer, or a hostel manager, would normally be sufficient.

Prisoners

It may be possible to apply standard identification procedures. Otherwise, a letter from the governor of the prison, or, if the applicant has been released, from a police or probation officer or hostel manager would normally be sufficient.

International students

Passport or EEA National Identity Card AND

Letter of Acceptance or Letter of Introduction from Institution on the DfES list

Guidance on identification for international students is available on the JMLSG website (see International Students: Basic Bank Account Opening Procedures - 12 August 2005).

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Economic migrants [here meaning those working temporarily in the UK, whose lack of banking or credit history precludes their being offered other than a basic bank account]	National Passport, or National Identity Card (nationals of EEA and Switzerland) Details of documents required by migrant workers are available at www.employingmigrants.org.uk and Home Office website www.homeoffice.gov.uk/ . Firms are not required to establish whether an applicant is legally entitled to work in the UK but if, in the course of checking identity, it came to light that the applicant was not entitled to do so, the deposit of earnings from employment could constitute an arrangement under the Proceeds of Crime Act.
Refugees (those who are not on benefit)	Immigration Status Document, with Residence Permit, or IND travel document (ie Blue Convention Travel doc, or Red Stateless Persons doc, or Brown Certificate of Identity doc) Refugees are unlikely to have their national passports and will have been issued by the Home Office with documents confirming their status. A refugee is normally entitled to work, to receive benefits and to remain in the UK.
Asylum seekers	IND Application Registration Card (ARC) NB This document shows the status of the individual, and does not confirm their identity Asylum seekers are issued by the Home Office with documents confirming their status. Unlike refugees, however, information provided by an asylum seeker will not have been checked by the Home Office. The asylum seeker's Applicant Registration Card (ARC) will state whether the asylum seeker is entitled to take employment in the UK. Asylum seekers may apply to open an account if they are entitled to work, but also to deposit money brought from abroad, and in some cases to receive allowances paid by the Home Office. Firms are not required to establish whether an applicant is legally entitled to work in the UK but if, in the course of checking identity, it came to light that the applicant was not entitled to do so, the deposit of earnings from employment could constitute an arrangement under the Proceeds of Crime Act.
Travellers	Travellers may be able to produce standard identification evidence; if not, they may be in a particular special case category. If verification of address is necessary, a check with the local authority, which has to register travellers' sites, may sometimes be helpful.

Notes:

1. Passports, national identity cards and travel documents must be current, i.e. unexpired. Letters should be of recent date, or, in the case of students, the course dates stated in the Letter of Acceptance should reasonably correspond with the date of the account application to the bank. All documents must be originals. In case of need, consideration should be given to verifying the authenticity of the document with its issuer.
2. As with all retail customers, firms should take reasonable care to check that documents offered are genuine (not obviously forged), and where these incorporate photographs, that these correspond to the presenter.

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