

Appendix 2

Know Your Customer (KYC) Policy for Prepaid Card Customers

Direct Payment Know your Customer (KYC)

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1. Introduction and purpose of the policy

A prepaid card is a regulated financial product. Allpay, our prepaid card provider, has a duty to ensure that the prepaid card system that they manage are compliant with the law and regulations.

One of the key responsibilities when issuing a prepaid card is to undertake a Know Your Customer (KYC) check which will be renewed every 3 years.

It is a requirement of the contract between Suffolk County Council (SCC) and Allpay that we undertake a KYC check before a prepaid card can be issued to the card user. This document outlines the process to be followed by SCC to ensure that we have met our obligation in relation to KYC.

All SCC staff who are involved in carrying out KYC checks will need to complete KYC training and record of all staff who have completed the training must be kept.

2. Know your customer (KYC) process

Verifying a prepaid cardholder's identity:

The identity of the customer must be confirmed in all cases, and this is a pre-requisite of issuing a prepaid card. SCC will use two method of completing the KYC identity checks. For children's services a third-party provider has been appointed to do this on behalf of SCC. For adult services the check will be carried out in person by an authorised member of SCC staff.

Process for adult services KYC identify checks:

- a. Check the customer's proof of identity – examples of acceptable documents are:**
 - Birth Certificate
 - Passport (in date)
 - Driving licence (in date)

b. The address of the customer must be verified

Check the customer's proof of address – examples of acceptable documents:

- Council tax bill (current financial year)
- Utility bills (dated within the last 3 months – mobile phone bills not acceptable)
- Bank statement or Credit card statement

c. The National Insurance Number (NINO) of the customer must be confirmed.

Check the customer's NI number – this does not need to be a separate document if any of the documents in A or B confirm this information. Other examples of acceptable documents are:

- National Insurance Card
- Payslip/P60/P45 from a recognised employer
- Letter from HMRC

Process for children services KYC checks:

SCC has appointed a third- party provider (Experian) to carry out the identity checks on behalf of SCC, [see their privacy policy](#). Prior to the check taking place, SCC will gain authority from the customer for this check to take place.

3. Recording the Know Your Customer (KYC) Check

SCC will record the completion of the KYC check. This will be recorded on the individual records.

As a minimum the record must state:

- The date of completion of KYC check
- The name of the person completing the check
- The original documentation seen and returned (for adult services only)
- For checks completed through Experian the outcome will be recorded

Customer details obtained from the KYC check should be noted in the appropriate Field of the SCC case management system (e.g. National Insurance number field – Adult services only) Where appropriate electronic copies of KYC verification can be uploaded onto customer records.

The KYC documents will be kept for the lifetime of the card plus, 3 years.