

UK STANDARD IDENTITY AND FINANCIAL STATUS (OVERVIEW)

This provides essential information applicable to just about any role. It's also especially fast as it draws on publicly available information, and like all our checks meets the requirements of the BS7858 standard for security screening services.

The check confirms identity by comparing the public electoral register against a six year address history provided. It also establishes whether there were any county court judgments, bankruptcies or voluntary arrangements in the past six years.

Finally, there is use of the CAPS (Credit Application Previous Searches) database to investigate any discrepancies in name, addresses, date of birth and marital status between the data supplied and other applications they may have made in the past year.

WHAT TYPES OF PUBLIC INFORMATION ARE AVAILABLE?

The Public Information File contains information about an individual that is available from public records. This is compiled by a Credit Bureau using the information from the Registry Trust Limited, official gazettes and the insolvency service.

The different types of Public Information searched are:

Judgement. This refers to County Court Judgment (CCJ). The individual has been taken to court for non-payment of outstanding debts and successfully sued. In England and Wales, money judgements are issued in the County Courts. These are referred to as County Court Judgements (CCJ's).

Judgements issued in Scotland are referred to as decrees and are issued through the Sheriff's Courts. Northern Ireland judgements are issued by the Northern Ireland Court Service. They were formerly issued by the Enforcement of Judgements Office.

Notices of Bankruptcy/Bankruptcy Orders. The debtor has been made bankrupt/ The debtor has been made bankrupt after they or their creditors have asked for this to be done.

An individual is made bankrupt as they are unable to meet their financial responsibilities the Credit Bureau are informed of this, with an undetermined amount, by the Insolvency Service.

Bankruptcies are generally automatically discharged 12 months from the

anniversary of the bankruptcy order

The court would immediately annul (cancel) a bankruptcy order when the debts, fees and expenses of the bankruptcy proceedings have been paid in full or the bankruptcy order should not have been made.

Unless the bankruptcy is annulled this information will stay on the system for up to 6 years

Orders of Discharge. The bankruptcy has been ended.

Adjudication Annulled. The debtor has made an offer to discharge their liabilities that has been accepted by the creditors and the court, so they are in effect no longer bankrupt.

Petitions for Bankruptcy. Either the debtor or their creditors have asked the court to start bankruptcy proceedings.

Voluntary Arrangements. The creditors have accepted an arrangement for the debtor to pay off their debts An IVA is a legally binding agreement between an individual and their creditors, supervised by a licensed insolvency practitioner. It means that the individual makes an agreed number of monthly payments. Providing the payments are made, the remaining debt is written off at the end of the period. IVAs are retained for six years from the date of registration. If you would like IVA advice or simply to discuss the IVA process in greater detail, contact ClearStart, Consumer Debt Service on freephone: 0800 138 5445.

Administration Order. An agreement between an individual and a county court, in which the court helps the individual make arrangements to pay outstanding debts to creditors. The debts must not total more than £5000.

HOW LONG DO CCJ'S STAY ON A CREDIT FILE?

Any judgment, satisfied or not, will for six years from the date it was logged at Registry Trust. If a CCJ has been paid within 28 days it can be set aside or cancelled and can be removed from the Credit Bureau report if they are provided with a copy of the set aside certificate from the defendant.

WHAT IS A NON-CREDIT APPLICATION AND IS IT RECORDED?

Non-credit applications are made by organisations that are not granting credit, but need to access public information (eg. County Court Judgments or Registered Judgments (Ireland)) held by the credit bureau. Examples of non-credit applications include enquiry agents, **employment vetting**, property and car rental vetting, gaming, and leisure. Non-credit applications may also be made by credit-granting organisations that are accessing the credit bureau for non-credit purposes, eg. money-laundering checks. Non-credit applications record a 'footprint', which can only be viewed by the consumer, not by other lenders.

If a search is made for any reason other than lending purposes, an unrecorded enquiry is placed on a person's file. Unrecorded enquiries are not displayed to lenders, so the search footprint cannot influence future lending decisions. It is recorded on the applicant's credit file so they know who has made a search.

THE INDIVIDUAL STATES THEY ARE REGISTERED ON THE VOTERS ROLL BUT THE REPORT SAYS THEY ARE NOT. WHY IS THIS?

Recent legislation has resulted in there being two versions of the Voters Roll. Electors have the option to 'opt out' of appearing on the 'edited register' and to 'opt in' and only appear on the full register.

Opt In - The full register lists everyone who is entitled to vote and can only be used for specific purposes (permitted purposes) including the prevention and detection of crime, and identity checking within credit application.

Opt Out - The edited register leaves out the names and addresses of people who have asked for their names to be excluded from that version of the register. The edited register can be used for any purpose. Candidate Verifier and Tenant Verifier are not 'permitted purposes' and can therefore only use the edited register.

In 2009 approximately 46% of voters chose not to have their names on the edited register. This means that sometimes the report will state that we cannot confirm the applicant is a resident at an address using the Voters Roll, even though the applicant may state that they are on the Voters Roll.

THE INDIVIDUAL CLAIMS THE FINANCIAL INFORMATION HELD ON THEM BY THE CREDIT REFERENCE AGENCIES IS NOT CORRECT - WHAT CAN THEY DO TO CHANGE IT?

They can contact the 3 Credit Reference Agencies that operate in the UK by writing to them:

Call Credit: Customer Care, Call Credit Check, PO Box 734, Leeds, LS1 9GX
www.callcredit.co.uk

Equifax: Equifax Credit File Advice Centre, PO Box 1140, Bradford, BD1 5US
www.equifax.co.uk

Experian: Consumer Help Service, Experian Ltd, PO Box 8000, Nottingham, NG80 7WF www.experian.co.uk

THE CANDIDATE CLAIMS THEY HAVE PAID THE CCJ. WHY IS IT NOT SHOWING AS SATISFIED?

They need to apply for a Certificate of Satisfaction from the Court and include the official fee of £10 (payable to HM Paymaster General). Once a Certificate is issued an amendment will be made to the public record and all Credit Reference Agencies will be notified of any amendments required (Equifax, Call Credit and Experian). This is usually within four weeks.

If they have paid a Scottish Decree, please send proof of payment from the pursuer (the individual or organisation that took the case to court) to Registry Trust Limited. This proof of payment should include your address at the time of the Decree and the case number, if known. They should also include the search fee of £4.50. Registry Trust will then notify all Credit Reference Agencies (Equifax, Call Credit and Experian) who will make the required amendments.

If they have paid a Northern Ireland judgment, please send written confirmation from the plaintiff, including their address at the time the judgment was entered, the amount and the case number if known to all the Credit Reference Agencies and they will make the necessary amendments (Equifax, Call Credit and Experian).

To access Registry Trust's Web site, click <http://www.registry-trust.org.uk/>

Satisfied judgments are retained on the file for a period of six years from the date of the original registration. They are not removed from the database unless the court issues a certificate of cancellation or set the judgment aside. In general, this will only occur if the judgment has been paid within 28 days of registration (cancellation) or should have never been registered (set aside).

HOW ARE ADDRESS LINKS CREATED?

Address links are created through movement of credit account information (CAIS) or applications for credit made by lenders. The date shown on the address links is the date an application has been made or the CAIS account has been moved.

WHAT STAGE DOES A DIRECTOR BECOME DISQUALIFIED?

Result of an investigation by following authorities a director may be disqualified because:

- 1) Police - Fraud is suspected
- 2) DTI investigations - General misconduct whilst running a company
- 3) Insolvency Service - usually as a result of an investigation of failed companies where a director knowingly continues to trade while insolvent.
- 4) Companies House - For breaches of the filing requirements as specified in the companies act.

If a case is proven, an individual is then disqualified by the court for a period of time specified in the order he cannot be a director of a company, the maximum period of disqualification is 15 yrs.

IS IT POSSIBLE TO CARRY OUT A SIMILAR CHECK INTERNATIONALLY?

Yes, we are capable of conducting checks in most countries depending on the local legislation and availability of data.

WHAT IS CIFAS?

CIFAS, the UK's Fraud Prevention Service, is a not-for-profit organisation whose Members exchange information on fraud and attempted fraud. The aim is to protect the interests of CIFAS Members from the actions of criminals and to ensure that innocent members of the public are not prejudiced by fraudsters' misuse of their identities and documentation.

For more information about CIFAS, visit their web site by clicking <https://www.cifas.org.uk/>

UK CRIMINAL RECORDS

These are available at three levels:

Basic. This details any convictions considered to be unspent under the Rehabilitation of Offenders Act 1974. Most convictions are considered to be 'spent' after a certain period of time (based on the severity of the penalty) and if no further offence has taken place. This can be carried out on any person with their consent, regardless of the type of job involved. Unless a profession is exempt from the rehabilitation of offenders act the only level of check which you can conduct is a Basic Level disclosure covering a candidate's unspent convictions. For details of professions which are exempt from rehabilitation of offenders act please see http://www.crb.homeoffice.gov.uk/guidance/rb_guidance/eligible_posts.aspx

Standard. This details both unspent and spent convictions. The Standard CRB check is available for all positions covered by the Exceptions Order 1975 to the Rehabilitation of Offenders Act (ROA) for example positions within the Security Industry and Financial Services. Most of the relevant convictions in Scotland and Northern Ireland may also be included

Enhanced. In addition to the information included in Standard checks, Enhanced Disclosures include checks of the new 'Children's' and 'Vulnerable Adults' barred lists and additional checks for relevant and proportionate information held by the local police forces to see if there is any information relevant to the position being applied for. This is only available for those working in a regulated activity with a Regulated Activity Provider as defined in the Safeguarding Vulnerable Groups Act (SVGA) e.g. work involving caring for or supervising children or vulnerable adults. Enhanced checks are also issued for certain statutory purposes such as gaming and lottery licenses and judicial appointments.

WHAT LEVEL OF CRIMINAL RECORD CHECK CAN WE UNDERTAKE ON OUR EMPLOYEES?

Unless a profession is exempt from the rehabilitation of offenders act the only level of check which you can conduct is a Basic Level disclosure covering a candidate's unspent convictions. For details of professions which are exempt from rehabilitation of offenders act please see

http://www.crb.homeoffice.gov.uk/guidance/rb_guidance/eligible_posts.aspx

WHAT ARE “SPENT AND UNSPENT” CONVICTIONS?

Most convictions expire for the purpose of the Rehabilitation of Offenders Act after a period of time. Once a conviction expires it then becomes “spent”. A basic disclosure will not include details of these “spent” convictions. The length of time it takes for a conviction to become spent varies depending on the type and length of the conviction.

Sentence	Expiry
Life imprisonment, imprisonment for more than 30 months, preventative detention, or their equivalent for young offenders. Never	Never
Imprisonment, corrective training or sentence of detention in a young offenders institution for more than six months but not more than 30 months	10 years*
Imprisonment or sentence of detention in a young offenders institution for a term not exceeding six months	7 years*
A fine or other sentence not expressly covered by the Act 5	5 years*
Order for detention in a detention centre	3 years
Absolute discharge	6 months
Conditional discharge	One year
Probation	5 years*

* Expiry may be reduced by half for a person under 18 at the time the sentence was passed.

Should an individual re-offend within the time period determined for the previous offence to be spent (stepped down), then the time clock is re-set from that time and a further clear period begins, this ensures that any recidivist records remain visible for Basic Disclosures.

Where a record contains more than one category of disposal history the guideline relating to the longest retention period will prevail. For example if an adult receives a caution for an offence which would normally step down after a 5 year clear period, but during this period is convicted of an offence with a 20 year clear period, both histories will be held until the end of the 20 year clear period.

THE REHABILITATION OF OFFENDERS ACT 1974

The Rehabilitation of Offenders Act 1974 (ROA) is the specific piece of legislation affecting ex-offenders' employment opportunities. Under certain circumstances, it enables them to 'wipe the slate clean' of their criminal record once a period of time has lapsed from the date of conviction. Provided they have not been re-convicted for another offence, their conviction is said to become *spent* and for the purpose of employment it can be treated as though it never existed. This means that if the exoffender is asked on an application form, or at an interview, if they have a criminal record they are entitled to answer 'no'. It is illegal for an employer to discriminate against the ex-offender on grounds of their spent conviction.

The Act only covers custodial sentences up to two and a half years. Custodial sentences of a longer period must be declared where asked for.

The length of time that is required for an ex-offender to become rehabilitated depends on the sentence received for the conviction. Each sentence carries its

own rehabilitation period. The rehabilitation period may vary depending on the offender's age when sentenced. **Sentences over two and a half years can never be spent.** Suspended sentences are treated as though they were put into effect. For example, a 1 year custodial sentence suspended for 2 years will carry a rehabilitation period of 10 years.

For more information on the Rehabilitation of Offenders act please see:

<http://www.legislation.gov.uk/ukpga/1974/53>

THE CRIMINAL JUSTICE AND PUBLIC ORDER ACT 1994

The above act came into effect on 5th February 1995 and extends the rehabilitation period for those individuals placed on probation.

WHAT PROOF OF IDENTIFICATION AND PROOF OF RESIDENCY DO I NEED TO SUPPLY WHEN REQUESTING A BASIC CRIMINAL RECORD CHECK?

Please provide the following documentation:

- One proof of identification
- One proof of residency at current address

Acceptable proofs are listed below. Once you have obtained these documents, please upload them directly into the candidate's record on the Peoplechecking system.

Acceptable proofs of identification

- passport
- driving license card only
- birth certificate (accompanied with National Insurance number)
- State issued photo identity (EU countries only, both sides must be present and also a national insurance number is required)

Acceptable proofs of residency at current address

- UK Driving License Card (plus a proof of identification document)
- Bank or building society statement*
- Utility bill (electricity, gas, water, landline telephone)*
- Credit Card Statement*
- Store Card Statement*
- Valid insurance certificate*
- Mortgage Statement**
- Financial statement (e.g. pension, endowment, ISA)**
- Mail order catalogue statement*
- Court summons**
- Council tax bill**
- Addressed pay slip*

* Documentation should be less than three months old

** Issued within past 12 months

Please ensure the proof of identity and residency is legible

WHAT PROOF OF IDENTIFICATION AND PROOF OF RESIDENCY DO I NEED TO SUPPLY WHEN REQUESTING A STANDARD OR ENHANCED CRIMINAL RECORD CHECK?

For a full explanation of the documents required by the Disclosure and Barring Service, please visit the following link:

<https://www.gov.uk/disclosure-barring-service-check/documents-the-applicant-must-provide->

The documentation requirements, as listed in the link above, are:

The documents needed will depend on the route the application takes. The applicant must try to provide documents from Route 1 first.

Route 1

The applicant must be able to show:

- one document from Group 1, below
- 2 further documents from either Group 1, or Group 2a or 2b, below

At least one of the documents must show the applicant's current address.

Route 2

If the applicant doesn't have any of the documents in Group 1, then they must be able to show:

- one document from Group 2a
- 2 further documents from either Group 2a or 2b

At least one of the documents must show the applicant's current address. The organisation conducting their ID check must then also use an appropriate external ID validation service to check the application.

Route 3

Route 3 can only be used if it's impossible to process the application through Routes 1 or 2. For Route 3, the applicant must be able to show:

- a birth certificate issued after the time of birth (UK and Channel Islands)
- one document from Group 2a
- 3 further documents from Group 2a or 2b

At least one of the documents must show the applicant's current address. If the applicant can't provide these documents they may need to be fingerprinted.

Group 1 – Primary Identity documents

Document	Notes
Passport	Any current and valid passport
Biometric residence permit	UK
Current driving licence photocard - (full or provisional)	UK, Isle of Man, Channel Islands and EU

Birth certificate - issued within 12 months of birth	UK, Isle of Man and Channel Islands - including those issued by UK authorities overseas, eg embassies, High Commissions and HM Forces
Adoption certificate	UK and Channel Islands

Group 2a – Government Trusted documents

Document	Notes
Current driving licence photocard - (full or provisional)	All countries outside the EU (excluding Isle of Man and Channel Islands)
Current driving licence (full or provisional) - paper version (if issued before 1998)	UK, Isle of Man, Channel Islands and EU
Birth certificate - issued after time of birth	UK, Isle of Man and Channel Islands
Marriage/civil partnership certificate	UK and Channel Islands
HM Forces ID card	UK
Firearms licence	UK, Channel Islands and Isle of Man

All driving licences must be valid.

Group 2b – Financial and Social History Documents

Document	Notes	Issue date and validity
Mortgage statement	UK or EEA	Issued in last 12 months
Bank or building society statement	UK and Channel Islands or EEA	Issued in last 3 months
Bank or building society account opening confirmation letter	UK	Issued in last 3 months
Credit card statement	UK or EEA	Issued in last 3 months
Financial statement, eg pension or endowment	UK	Issued in last 12 months
P45 or P60 statement	UK and Channel Islands	Issued in last 12 months
Council Tax statement	UK and Channel Islands	Issued in last 12 months
Work permit or visa	UK	Valid up to expiry date
Letter of sponsorship from future employment provider	Non-UK or non-EEA only - valid only for applicants residing outside of the UK at time of application	Must still be valid
Utility bill	UK - not mobile telephone bill	Issued in last 3 months
Benefit statement, eg Child Benefit, Pension	UK	Issued in last 3 months
Central or local government, government agency, or local council document giving entitlement, eg from the Department for Work and Pensions, the Employment Service, HMRC	UK and Channel Islands	Issued in last 3 months
EU National ID card	-	Must still be valid
Cards carrying the PASS accreditation logo	UK, Isle of Man and Channel Islands	Must still be valid

Document	Notes	Issue date and validity
Letter from head teacher or college principal	UK - for 16 to 19 year olds in full time education - only used in exceptional circumstances if other documents cannot be provided	Must still be valid

HOW LONG IS A CRIMINAL RECORD CHECK VALID?

Each Disclosure will show the date on which it was provided. The older the Disclosure the less reliable it becomes. The CRB recommends that disclosures should be renewed every 3 years, or when a person changes their employer however, some organisations have regulators that may require renewals at shorter periods.

IS IT POSSIBLE TO CARRY OUT A SIMILAR CHECK INTERNATIONALLY?

Yes, we are capable of conducting checks in most countries depending on the local legislation and availability of data.

GENERAL

HOW SECURE IS THE INFORMATION I AM SENDING?

Every web page or link to a web page that requires information to be submitted is secure. You will notice that the link or the web page will have **Https** in the URL; the **Https** implies that when the information is submitted over the World Wide Web, the data is encrypted and can only be read by the intended recipient.

Https is widely used on the World Wide Web for security-sensitive communication such as payment transactions and corporate logons.

Every web page that requires information to be submitted will also have a padlock in the bottom right hand corner of the page; this shows that information submitted is sent securely

DO I NEED TO SEND YOU A SIGNED CONSENT FORM

Generally speaking no. There are a select few searches where we require a signed release form in order to complete your request

HOW DO YOU DEAL WITH DATA PROTECTION ISSUES?

NorthgateArinso PeopleChecking is registered under the Data Protection Act 1984 and adheres strictly to the requirements of the 1998 Act. We will not conduct a screen until we have the consent of the candidate.

The Data Protection Act does not prevent you from carrying out any of our checks, but it does require you to make the candidate aware of checks. We do this and obtain consent through the online application process.

Under the Data Protection Act, only information relevant to ongoing employment should be transferred from application forms. Information about criminal convictions should be deleted unless it is clearly relevant to ongoing employment.

WHAT ARE OUR LEGAL OBLIGATIONS UNDER THE DATA PROTECTION ACT FOR OBTAINING AND SUPPLYING REFERENCES?

The common belief that the Act gives individuals the right to gain access to references about them is not true. Under Schedule 7 of the DP Act, individuals are explicitly excluded from access to references about them, unless the reference was not given in confidence. But this exemption is limited to while the confidential reference is in the hands of the organisation which gave it, according to two publications from the Information Commissioner: the Data Protection Act, legal guidance, December 2001, and the Employment Practices Data Protection Code, Part 1, March 2002.

Part 1 of the code says the role of references is to confirm factual details supplied by applicants. It recommends employers:

1. only obtain details directly relevant to a particular vacancy, and which will be used as part of the selection process
2. explain the reference procedure to applicants, including the nature of the information that will be requested, and obtain their consent
give applicants the opportunity to make representations should any checks produce discrepancies.

MY ORGANISATION ISN'T REGISTERED UNDER THE DATA PROTECTION ACT - HOW DO I GO ABOUT DOING THIS?

You can find more information regarding the notification process and register online via the Office of the Information Commissioners website at www.ico.gov.uk - the process typically takes around 10 working days and it costs £35 to register.

DOES AN EMPLOYER HAVE TO HAVE CONSENT TO CARRY OUT CHECKS?

Yes. Employers have to have obtained consent. The candidate gives this consent during the process of entering their information in the PeopleChecking system. If they do not check the consent boxes our system will not allow the check request to be submitted.

SPECIFIC HELP FOR CANDIDATES

DOES AN EMPLOYER HAVE TO HAVE MY CONSENT TO CARRY OUT CHECKS?

Yes. Employers have to have obtained your consent. You give this consent during the process of entering your information in the PeopleChecking system. If you check the consent boxes our system will not allow the check request to be submitted.

WHY IS MY EMPLOYER CONDUCTING THESE EMPLOYMENT SCREENING CHECKS?

Employers conduct checks for a variety of reasons, some of the most common are:

- Your employer is looking to protect their existing business, employees and customers by ensuring that any new employee is who they claim to be and have the necessary skills and background to do their job successfully
- An industry body / regulator has advised or told them to
- One of their customers has requested they do checks to certain levels in order to win or continue working on one of their contracts

WHY IS MY EMPLOYER USING NORTHGATEARINSO TO DO THESE CHECKS?

Implementing and administering a robust employment screening process is time consuming so many organisations outsource the task to us to simply ease the administrative burden. Additionally, many employers like the fact that they can call on the skills and experience of a specialist provider rather than having to maintain multiple relationships with suppliers themselves.

DOES NORTHGATEARINSO ADVISE EMPLOYERS WHETHER OR NOT TO EMPLOY ME?

No, recruitment decisions are the sole responsibility of employers. NorthgateArinso simply conduct the checks requested by our customers and return the results of those checks. We do not make any comments on the suitability of any candidate for any job role.

Where does the information you use to put together your report come from?

NorthgateArinso use a variety of data providers who in turn may also collect their data from multiple sources. You can learn more about our checks and our data sources in the other FAQ's.

INFORMATION ON OTHER CHECKS

EMPLOYMENT HISTORY VERIFICATION

A reference is obtained from previous employers, typically covering the company name, employment status, period of employment, position on leaving and whether the employer would re-employ the person. When a gap in employment is declared, this asks a professional person such as a doctor, solicitor or teacher to verify what the candidate was doing during that time. The check can alternatively be used to obtain a personal reference when the more usual employer's reference is not suitable.

Other information we seek through an employment references generally covers:

- Overall Work Performance
- Attendance & Reliability
- Ability To Work With Others
- Honesty & Integrity
- Attitude & Conduct
- Presentation & Appearance
- Was any disciplinary action Taken?
- Would you re-employ this person?
- Number of days absence in the last 12 months
- Dates of parental leave, if any

ACADEMIC QUALIFICATION CHECK

This provides confirmation of an academic degree or secondary education qualification. We contact the academic establishment to confirm the period of attendance, the type of qualification gained, subjects studied and grades achieved.

PROFESSIONAL MEMBERSHIP

Checks that accurate information has been provided about professional and trade memberships we will provide you with written confirmation, including levels and dates of affiliation.

ONLINE SEARCH

This provides selected results based on a search using an online search engine against a full name. This will reveal any negative information that has been publicly reported on an individual.

FINANCIAL SERVICES AUTHORITY

The FSA database is searched for the person's name, status, FSA reference number, controlled functions, current employer name and start date, as well as any previous employers where the person worked in a controlled function, with start and end dates. The details and dates of any disciplinary action taken through the FSA are also listed in the search results.

UK DIRECTORSHIPS

A directorship report provides the registered company name, number and address for each directorship held by the candidate, and reveals any current or potential conflicts of interest showing active and inactive directorships

PROOF OF ELIGIBILITY TO WORK IN THE UK & DOCUMENTSCAN

ID DocumentScan allows organisations to comply with the Immigration, Asylum and Nationality Act 2006. ID DocumentScan is a fast and user-friendly document verification tool. ID DocumentScan generates a detailed inspection report for each ID document. It also creates an overview of all identity checks carried out to date. The overview specifies the name of the inspecting party as well as the features inspected. Should the need arise, you can furnish UK Borders Agency with these documents.

DRIVING LICENCE CHECK

This check secures confirmation from the DVLA of the person's licence validity and details of any endorsements.

SANCTIONS AND WATCHLISTS SEARCH

This checks for sanctions, enforcements and warnings in the UK and worldwide. The search includes individuals known or suspected to be affiliated with terrorism, money laundering, fraudsters, drug trafficking, arms dealing, war crimes, white collar fraud or other illegal activities, as well as Politically Exposed Persons (PEP's).

The sources we search are:

Sanctions bodies searched

Commission de Surveillance du Secteur Financier, Luxembourg, Commonwealth of Australia Law, De Nederlandsche Bank, Netherlands, Department of Foreign Affairs and Trade – Australia, European Union, Financial Services Agency - Japan, Guernsey Financial Services Commission, HM Treasury (formerly Bank of England), Home Office, Hong Kong Monetary Authority, Isle of Man Financial Supervision Commission, Jersey Financial Services Commission, Ministry of Finance, - Japan, Monetary Authority of Singapore, Office of Foreign Assets Control (OFAC) - United States Office of the Superintendent of Financial Institutions - Canada, Reserve Bank of Australia, United Nations Security Council Committee, US Department of State

Law enforcement bodies searched

Central Bureau of Investigation - India, Central Narcotics Bureau – Singapore, Cheshire Constabulary – UK, City of London Police – UK, Devon & Cornwall Constabulary – UK, Federal Bureau of Investigation (FBI) - United States, General Police Directorate – Slovenia, Hampshire Police – UK, Hong Kong Police Force, Interpol, Lancashire Constabulary – UK, Metropolitan Police Service – UK, National Crime Squad – UK, North Yorkshire Police – UK, Nottinghamshire Police – UK, Philippines National Police, Royal Embassy of Saudi Arabia, Royal Malaysian Police, South African Police Service, Surrey Police – UK, Thames Valley Police – UK, US Air Force Office of Special Investigations, US Bureau of Alcohol, Tobacco, Firearms and Explosives, US Drug Enforcement Administration, US Immigration and Customs Enforcement, US Marshals Service, US Naval Criminal Investigative Service, US Postal Inspection Service, US Rewards for Justice, US Secret Service, Warwickshire Police – UK,

Regulatory enforcement bodies searched

Alberta Securities Commission – Canada, Autorite des Marches Financiers – Canada, British Columbia Securities Commission – Canada, Commodity Futures Trading Commission (CFTC), Federal Deposit Insurance Corporation - United States Federal Reserve Board – United States, Federal Trade Commission - United States, Financial Crimes Enforcement Network (FinCEN), FINRA - United States, Investment Dealers Association of Canada, Investment Industry Regulatory Organisation of Canada, Manitoba Securities Commission Canada, Market Regulation Services Inc. – Canada, Mutual Fund Dealers Association of Canada, National Credit Union Administration, United States, National Futures Association - United States, New York Stock Exchange - United States, Nova Scotia Securities Commission, Office of Foreign Assets Control (OFAC) - United States, Office of the Comptroller of the Currency - United States, Office of the Superintendent of Financial Institutions – Canada, Office of Thrift Supervision - United States, Ontario Securities Commission - Canada, Saskatchewan Financial Services Commission - Canada, Securities and Exchange Commission (SEC) - United States, Securities Commission of Newfoundland and Labrador – Canada, US Court of International Trade, US Department of Justice, Australian Prudential Regulation Authority, Australian Securities and Investments Commission, Central Bureau of Investigation India, China

Securities Regulatory Commission, Financial Services Agency – Japan, Financial Services Board - South Africa, Financial Services Commission – Mauritius, Hong Kong Monetary Authority, Hong Kong Securities and Futures Commission, Indonesian Capital Market Executive Agency (Bapepam), InvestED - Hong Kong SFC, Monetary Authority of Macao, Monetary

Authority of Singapore, Reserve Bank of India, Securities and Exchange Board of India, Securities and Exchange Commission of Pakistan, Securities and Exchange Commission – Republic of the Philippines, Securities and Exchange Commission – Thailand, Securities and Exchange Surveillance Commission – Japan, Securities Commission of New Zealand, Securities Commission – Malaysia, Assets Recovery Agency, Financial Services Authority (FSA), Gibraltar Financial Services Commission, Guernsey Financial Services Commission, HM Revenue and Customs, Investment Management Regulatory Organisation, Isle of Man Financial Supervision Commission, Jersey Financial Services Commission, Lloyd's Insurance Market, Personal Investment Authority, Securities and Futures Authority, Autorite des Marches Financiers – France, BaFin – Federal Financial Supervisory Authority (Germany), Banking, Finance and Insurance Commission (CBFA) – Belgium, Banque de France, CECEI – France, Banque de France, Commission Bancaire – France, Capital Market Commission – Greece, Comision Nacional del Mercado de Valores – Spain, Commission de Surveillance du Secteur Financier – Luxembourg, Commissione Nazionale per le Società e la Borsa, - Italy, Cyprus Securities and Exchange Commission, Czech National Bank, Danish Financial Supervisory Authority, Financial and Capital Market Commission – Latvia, Financial Market Authority – Austria, Financial Market Authority – Slovakia, Financial Regulator – Ireland, Financial Supervisory Authority of Norway (Kredittilsynet) Finnish Financial Supervision Authority, Hungarian Financial Supervisory Authority, Insurance Supervisory Commission of the Republic of Lithuania, Malta Financial Services Authority, Netherlands Authority for the Financial Markets, Polish Securities and Exchange Commission, Portuguese Securities Market Commission (CMVM), Securities Commission of the Republic of Lithuania, Securities Market Agency – Slovenia, Swedish Financial Supervisory Authority (Finansinspektionen), Swiss Federal Banking Commission, British Virgin Islands Financial Services Commission, Cayman Islands Monetary Authority, Central Bank of Belize, Central Bank of The Bahamas, Chilean Securities and Insurance Supervisor, Comision Nacional de Valores – Argentina, Comision Nacional Supervisor de Empresas Y Valores (CONASEV) – Peru, International Financial Services Commission – Belize,

Other bodies searched

Central Intelligence Agency (CIA) - Heads of State/Government, Bureau of Industry and Security, Centro Mexicano Para La Filantropia (CEMEFI), Companies House, Financial Action Task Force, Ministry of Economy, Trade and Industry – Japan, World Bank