

## Frequently Asked Questions:

### Why do I have to provide my ID?

All financial institutions have a responsibility to prevent money laundering and as a result, we are obliged to carry out certain checks on clients we deal with. The work that we are instructed to carry out requires ID checks to be completed on yourself before we can act. High level ID checks are required in order for us to carry out property work, pay funds to individuals, release legal documents or accept funds into our client account, and hold Trustee Meetings. We are regulated by HMRC in this area due to the nature of the work we do.

### Why is ID so important?

When we are asked to carry out work on behalf of an individual or pay money to them, it is of the utmost importance that we can be sure that the client instructing us is in fact who they say they are. Please see the following news article which highlights what can happen if adequate ID checks are not carried out:  
<https://www.bbc.co.uk/news/uk-england-essex-59069662>

As this article highlights, there are people out there who are looking to steal the identity of individuals in order to gain access to their property and bank accounts. This is why we require ID before we can carry out your instructions and also why we require this level of ID from you. We take our responsibilities to securing your funds and property very seriously and we want to make sure that we only deal with legitimate clients.

### What is Alpha Legal?

Alpha Legal is a Third Party secure client communication system. We have chosen Alpha Legal as the platform to integrate into our applications and processes, which include requesting ID by sending forms electronically to clients. It is also used for electronically sharing documents and electronically signing documents. For more information on Alpha Legal, please visit the Alpha Legal website:  
<https://www.alphalegal.co.uk/>

### Why do CTTC use Alpha Legal?

CTT take confidential information very seriously. Using Alpha Legal provides us with a secure way to communicate with you. This ensures that we are protecting your data when electronically requesting confidential information, as emails are NOT secure!

### Are Alpha Legal GDPR compliant?

The companies we use to carry out the checks are all GDPR compliant, as are our own systems for retaining data of this kind for the required period in accordance with the Anti-Money Laundering Regulations. For more information on Alpha Legal's security level please see the information on their website:  
<https://www.alphalegal.co.uk/security>

### **Why do I have to provide a bank statement?**

A bank statement is required as part of the ID check is ensuring that your bank account is linked to your current address. Where we are asked to pay funds to you, we are also able to confirm that this account belongs to you in order to ensure that funds are only ever sent to the intended individual. The only details we require to see on the bank statement are the name and address, sort code and account number and also the date of the statement. All other information such as transactions and account balances can be redacted if you wish.

### **Why does the address ID need to be dated within the last 3 months?**

This is to ensure that you are in fact the individual we should be dealing with. Recent address ID confirms that you have ongoing access to the property you have confirmed you live at.

### **Why can't I use my bank statement as address ID?**

We require four different pieces of ID in order to verify your identity sufficiently. This has been decided as part of our ID policy, in light of the HMRC regulations and the inherent risks in the area of work we do.

### **Can I email my ID instead of using Alpha Legal?**

Email is not a secure way of sending confidential information, as can be seen by the following article: <https://www.theguardian.com/money/2018/oct/17/push-payment-fraud-protection>

The most secure way in which we can obtain your ID is through Alpha Legal which is why this is the program we have decided to use.

### **I've sent my ID in before, why can you not just use this ID?**

If your address ID and bank statement are now out of date (dated more than 3 months ago) then we will require further up to date address ID in order to complete the checks, even if we've previously completed ID checks for you. Furthermore if the photo ID you have uploaded is now out of date we will also require up to date copies of this also. As stated above, all ID has to be in date and recent in order to pass the checks and verify that you live at your address.

### **I don't have all of the documents asked for on Alpha Legal, what do I do?**

Please contact your Adviser so that they can advise of alternative options available.

Please see the detailed regulations that we must comply with. Section 4.64 – 4.77 are the most relevant sections in relation to identifying individuals.

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