# How to... RUN A UK INDIVIDUAL SEARCH.



SmartSearch ///

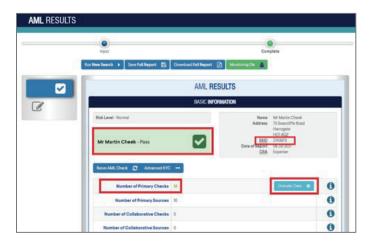
# Interpreting the results

The output information includes;

Optional document check with or without facial recognition

Please contact your Customer Success Executive if you would like to enable this service.

· PASS or REFER Result



The PASS/REFER results are determined by the number of Primary Checks made and the particular level of risk associated with the client. The amount of electronic proof required to verify a person for anti-money laundering purposes differs depending on the perceived risk level.

In line with the regulatory guidance for Electronic Verification, a normal risk client would need one match on an individual's full name and current address, a second match on an individual's full name and EITHER the individual's current address OR date of birth. Three matches are required for a high-risk pass.

SmartSearch's primary data matches come from results returned from Experian. This data is made up of both public data and their credit data base CAIS:

- Public Data includes the Electoral Register, County Court Judgements, bankruptcies, administration orders, etc.
- The Credit Account Information Sharing (CAIS) file holds information on over 440 million shared account records, including bank, mortgage, retail, credit cards and utility accounts. CAIS files are held on the vast majority of the active credit population with an average of six records held per applicant. Information is provided by virtually every major consuming lending organisation in the UK.

A breakdown of the data returned is detailed under different headings on the SmartSearch results page allowing you to see exactly where the primary checks come from and when they are dated:



- Number of Primary Checks (including financial agreements such as mortgages, media contracts and current accounts, credit and retail cards).
- Granular Data: this is a breakdown of what data has been returned which links the individual to their address and where the data has come from. It also provides information on the age of the data.
- Collaborative data: this information, along with current credit data, gives depth and breadth of information.

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Date of Birth Match Primary Data: this shows how many agreements contain a date of birth matching the one entered.

Document Matches: if documents have been added they will show a 'PASS' or 'FAIL'. These matches will also appear in the primary checks Granular Data. If no additional information was input, the match status will be listed as N/A.

Searches that Fail or Refer through Experian will be automatically processed against Equifax (unless otherwise agreed) to give you the highest possible pass rate without reverting to traditional costly verification methods such as documents. This will be charged as an additional AML name & address search at the rate detailed on your contract.

In addition to these results, SmartSearch also offer Negative Checks:



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Deceased Check: this involves checking the clients name and address against Experian's Mortality Files. The mortality alert is a name and address check, so be aware that if there are two people with the same at the same address (for a father and son, for example), the alert may be for one or the other.



Potential Fraud Alert: this is an address match only for the individual's residential address and will fail if the address entered is a Mail Drop, is on the accommodation address file or is the post office redirection list. This can also fail if the address was previously a business address.



Possible Mail Drop Address: this indicates that the address has been found on the Accommodation Address File, which is a database of over 8,000 addresses containing data taken from Experian's Limited Company and Thomsons database. This database is used to identify fraudsters (making credit applications or buying goods using stolen credit cards) using addresses that are not their current residential address, but from where they can collect mail sent to them. These addresses tend to be 'mail-drop' addresses which tend to be non-residential addresses used for forwarding mail.



Post Office Re-direction: the subject's name and current address has been found on the Post Office Re-directions File. Whilst this may be legitimate, when an identity has been stolen it is quite common for a fraudster to simply put a Post Office Re-direct on the victim's current address, so all mail is delivered to the fraudster rather than to the victim. Further checks are required.



PEP and Sanctions: this check is done by name match only with data retrieved from the Dow Jones Factiva Watchlist. SmartSearch host the Dow Jones Factiva Watchlist, giving clients the ability to undertake enhanced Due Diligence, and view detailed information, including photographs of individuals who match international Sanctions lists, or are Politically Exposed Persons. SmartSearch will also monitor all the searches put through the SmartSearch platform in line with your account (Daily, Weekly, Monthly) for new entrants onto Sanctions and PEP lists.

### Sanctions

Fail: indicates an individual with the same name has been found on a Sanctions list. These lists include the HM Treasury and the Office of Foreign Asset Control databases of people who it is prohibited from dealing with. Enhanced Due Diligence will need to take place unless automatically completed by SmartSearch.

# **Politically Exposed Persons**

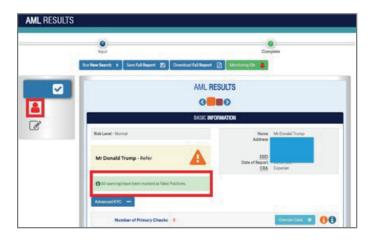
Fail: indicates an individual with the same name has been found on the Politically Exposed Persons database. Enhanced Due Diligence will need to take place unless automatically completed by SmartSearch.

If any of the Warnings return a 'Fail' response, an alert is displayed at the top of the report beneath the result and an email is automatically sent to the designated Compliance Officer so that Enhanced Due Diligence can be carried out. Further to this, any Due Diligence required will also be indicated by a blue and red flashing icon displayed on the left-hand navigation menu.

# Conducting Enhanced Due Diligence

If you download the PDF report before conducting any Enhanced Due Diligence, you will see lots of red error messages. This is to prompt you to conduct the required Due Diligence.

To conduct this through the SmartSearch platform, click on the blue and red flashing icon. If you click on the icon it will bring you to a page with a list of the matches where you will need to determine if it is your client or not.

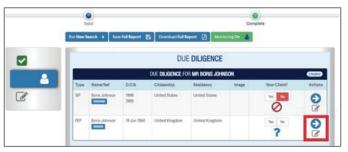


If a DoB has been entered at the outset, the system will automatically supress the matches with different DoB's to your client. Doing the work for you!

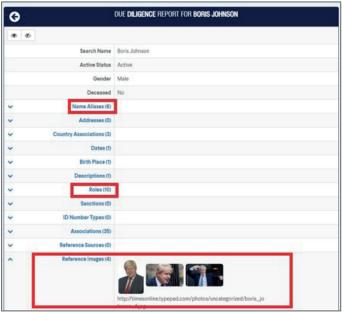
Sometimes there are photographs which may help if you have met your client face-to-face before. There may also be the citizenship and residency which you can use to eliminate it as your client.



If you are still unsure you can click the blue arrow under 'Actions' which will bring you to another page that will give you extra information about this particular PEP or Sanction match. This will contain blue subheadings with numbers next to them. Some of the following are useful sections to look at:



- Roles: there will always be a role if it is a PEP match.
- · Name Aliases: knowing your client's middle name is can often eliminate them as a PEP.



Once you have reviewed all the information the little blue arrow at the top will take you back to the page of the matches.

If this match IS your client, select 'Yes'. This will turn the question mark into a tick and ongoing monitoring will be provided for that record.



If there are any further charges with your client and ongoing monitoring is on, the MRLO will receive any updates and will be able to retrieve the search and conduct relevant Due Diligence. For example if your client's role were to change you would receive a new alert for due diligence.

It is not illegal to deal with a PEP. However, it is illegal to deal with someone on a Sanctions List.

If the match is NOT your client click 'NO' and this will turn the question mark into a 'No Entry' and ongoing monitoring for this specific record will then be disabled which means you will not be getting further notifications on that specific record.



Notes Section – there is also a notes section where you can type in any relevant notes explaining your decision to provide any evidence that you have conducted your due diligence. This will be shown at the bottom of the PDF report.

A time and date-stamped will also be automatically added once EDD has been conducted, providing a further level of detail should you be audited.

Assuming the match is not your client, if you click back onto the download full report option, you will now see that the Red writing has turned to Green.



The PEP and Sanction will still show a fail for auditing purposes as there is a name match. However, above that it will be marked as a 'false positive' to show you have conducted your due diligence.

The full report can be downloaded in PDF format by clicking 'download full report' at the top of the page. It is worth noting the SmartSearch ID number (SSID) in the top right-hand corner of the results page. The number is unique to each search and allows searches to be retrieved quickly and easily. The SSID number can be quoted to SmartSearch should you have any queries.

## **Common Questions**

# Does the search leave a footprint on the individual's Credit File?

The check does leave a footprint on the individuals' credit file. This is because for audit purposes Experian are required to record that the search has taken place.

However, this footprint is not the same as credit check footprint and has no negative impact on their file. It is just shown as an 'identity search' which is effectively a light footprint, simply showing an AML search has taken place. An individual can have many identity footprints and it still will not affect their credit file. Because of this you do not need the client's permission, you just need to inform them that the check will take place.

# Why am I getting an 'Address not found' message?

The Postcode Look Up system is driven by the Post Office Address File (PAF). This is approximately 97% accurate and occasionally returns an address which is not complete. For example, if a house has been converted into flats then the flats may not be listed. Also, with remote properties addresses may be formatted in a slightly different way: for this reason SmartSearch allow you to alter the address manually. In order to return data from Credit Reference Agencies, the address format must match the way it was entered onto any credit agreements etc and subsequently recorded by the Credit Reference Agencies, if you need any assistance please do not hesitate to contact your dedicated Customer Success Executive or another member of the Customer Success Team.

# How can I get a PASS result but still get a Sanctions or PEP alert?

The AML check and the Sanctions/PEP check ae two different things. The AML check is confirming the identity of the person at the address supplied. The Sanctions/PEP check is a 'Name Only' check and is checking lists of know Sanctions and PEPs. As this is a name only check the majority of results are 'false positives' i.e. not the person you are dealing with. As the two checks are independent it is possible to PASS the client for AML purposes and still receive an alert, meaning you need to conduct Enhanced Due Diligence to ascertain if it is your client on the Sanctions/PEP list.

### **Understanding the PASS/REFER results**

Normal Risk Client – PASS: This indicates that two or more of the primary checks have been made on the individual at that address and the client has therefore met the regulatory guidance of Electronic Verification.

**Normal Risk Client – REFER:** This indicates that fewer than two Primary Checks have been made on that individual at that address and further proof of identity should be sought.

**High Risk Client – PASS:** his indicates that three or more of the Primary Checks have been made on the individual at that address, and the client has therefore met the regulatory guidance for Electronic Verification.

**High Risk Client – REFER:** This indicates that less than three Primary Checks have been made on the individual at that address and further proof of identity should be sought.

### **Further Support**

If you have any questions, please do not hesitate to contact your dedicated Customer Success Manager or another member of SmartSearch's Customer Success Team.