

The second meeting of the MLAC ID working party, chaired by Philip Robinson, was held at the offices of the FSA on 13 March 2006.

Attendees at that meeting were as follows:

Philip Robinson	FSA
Elizabeth Richards	Law Society
Dominic Thorncroft	UK Money Transmitters Association
Stewart Bain	HMRC
Robert Goode	Gambling Commission
Pippa Barker	Thomas Cooke
David Oliver	National Association of Estate Agents (NAEA)
Rouma Hye	Royal Institute of Chartered Surveyors (RICS)
Ian Darke	SOCA
Gillian Mackenzie	FSA

The group received, in advance of the meeting:

- JMLSG Guidance Notes chapter relating to identification;
- A paper submitted by law enforcement to the FSA's ID Working Group last year, which discussed law enforcement requirements in relation to the ID process; and
- Submissions made by members of the group on the issues their own sectors face in relation to the ID process.

The group discussed issues on reliance, raised by NAEA, RICS and the Law Society in conveyancing. The group agreed that obtaining ID needs to be done at the part of the process where most value is added and where the greatest risk is presented.

The representative from the Law Society pointed out that, under current procedures, the client can have been asked to provide verification of ID by their solicitor, their bank and the estate agent.

The group agreed that it would be valuable to have an NCIS-type assessment focused on property that would look at property (including lettings) as a vehicle for money laundering. This could also cover where Law Enforcement sees the threat of money laundering in property and how the verification of identification deals with that threat.

Ian Darke (SOCA) confirmed that some work had been done in this area.

Members of the group agreed that further guidance was required for clients to understand why verification of their identification was required.

Philip Robinson agreed to chair a further meeting between Gillian Charlesworth (RICS), Elizabeth Richards (Law Society), Peter Bolton-King (NAEA) and Ian Darke (SOCA) to discuss how best to take this issue forward and to establish whether the work that has already been done in this area could be shared with all interested stakeholders.

The group discussed the possible use of the JMLSG Guidance Notes in their own sectors, given the fact that Law Enforcement have signed up to the content of the Guidance Notes.

Law Society confirmed that they were moving toward the JMLSG approach. RICS and NAEA joint guidance could be adapted and the Money Service Business sector was planning to discuss this issue at their April forum meeting.

The next meeting will be arranged for July.