Integrated Financial Arrangements Ltd
A firm authorised and regulated by the Financial Conduct Authority

For adviser use only

Transact document certification guidance including Anti-Money Laundering requirements

User guide

This guide sets out the certification requirements and the type of evidence that we need to meet Anti-Money Laundering (AML) requirements and maintain a client's Transact portfolio.

Please familiarise yourself with this information to help us ensure that we work together as effectively as possible to help clients get started with, and to carry on using Transact.

The UK Anti-Money Laundering Regulations specify several requirements that must be met, including the obligation to verify the identity and address of everyone connected to a Transact portfolio, e.g. individual clients, companies, trusts, beneficiaries, trustees and those appointed under a power of attorney.

When Transact establishes a relationship with any of these individuals or entities, an electronic identity verification check must be carried out. There are several reasons why these checks can occasionally fail, in which case we will ask you, as the client's adviser, to supply evidence of the client's identity and address.

The section below deals with what's required if the electronic identity verification check fails. It covers the documents and certification required to verify a client's identity and their address, and is split into the following topics:

1. Acceptable AML documents – opening a portfolio
2. Certification wording – sending documents in the post
3. Certification wording – submitting documents online using Upload Documents.
4. Acceptable certification requirements
5. Maintaining a client's portfolio – certification requirements

1. Acceptable AML documents

If our electronic identity verification check cannot verify the individual client's identity and address, evidential documentation, in the form of a JMLSG Compliant third-party validation certificate that you have used to validate the client through your own due diligence can be used. An example of such a provider is **SmartSearch**.

Please refer to our **(M354) Third-Party Anti-Money Laundering (AML) Verification – SmartSearch User Guide**.

Other providers carry out searches in a similar way to SmartSearch. If one such provider was used in your own due diligence, please send the certificate and we will decide if it meets our requirements and that we consider it to be JMLSG Compliant.

In the absence of such a certificate, a certified copy of two or more of the documents listed in the Acceptable AML Requirements table below will be required; one from the Proof of Identity column, one from the Proof of Address column.

1.1 Acceptable AML requirements

Proof of identity	Proof of address
Current government issued document (with photograph) e.g.: • Valid Passport (Both page 1 and Page 2, showing photo, full name, date of birth, passport number, and signature) • Valid UK or EEA photocard driving licence • Northern Ireland Electoral Card • EEA member state ID card (non-UK nationals) • Shotgun or firearms certificate	Bank statement or credit/debit card statement issued by a UK or EU regulated bank (not older than three months or printed from the internet)
	Utility bill or statement (not older than three months or printed from the internet)
	Valid and current UK or EEA photocard driving licence (the photograph must also be in date)
	Local rent card or tenancy agreement
	Local authority tax bill for the current year
	HMRC tax notification for the current year
	Mortgage statement for the current year
	Original solicitor's letter confirming recent house purchase or land registry confirmation

If a document is used to verify the identity of the client, the same document cannot be used to verify their residential address. Identity and address verification must be established by submitting two separate documents. E.g. a driving licence cannot be used for both identity and address verification.

If your client is not able to provide an identity document with a photograph, we will need clarification as to why. We may be able to accept the following non photographic evidence:

Proof of identity
Valid full UK Driving Licence (old style)
Instruction of court appointment (e.g. Probate)
Benefit book or notification letter from Department of Work and Pensions confirming rights to benefit or state pension.

We will still require address verification documentation.

Note: if a client is applying for an offshore bond, additional documents will be required. These are set out in the Transact Offshore Bond Document Certification and Anti-Money Laundering Guide which is available on Transact Online (via *Information > Documents*).

1.2 Turning 18 additional ID and address verification documents

When a client turns 18 and takes control of their own portfolio we need to ensure we have up to date AML documentation for them. Due to their age, it may be that an 18 year old does not hold the documentation listed in our Acceptable AML Requirements table. If this is the case, please refer to the below table for alternative documents that we would accept.

ID document (has to be issued and certified within 12 months)	Address verification (has to be issued and certified within 12 months)
Provisional driving licence	Provisional driving licence
HMRC child benefit entitlement letter	HMRC child benefit entitlement letter
Department for Work and Pensions* National Insurance Number confirmation letter	Department for Work and Pensions* National Insurance Number confirmation letter
Electoral roll confirmation letter	Electoral roll confirmation letter
Letter provided by a College/University confirming client is a student at the institution	Letter provided by a College/University confirming client's address (must match address of client's portfolio).
NHS medical card/GP registration	NHS medical card/GP registration
	Employer salary slip if confirms client address (not older than three months)

*Department for Social Development in Northern Ireland

The same document cannot be used for both ID and address verification

1.3 Requirements for minors (children under the age of 18)

AML (Anti Money Laundering) checks are not required for children. AML checks will be carried out on the parent or legal guardian. The minor's identity will be verified as soon as they are able to take control over their own portfolio at age 18.

Please supply a birth certificate or certified passport if the child wishes to send a deposit from their own bank account.

The certification of these documents must have been completed within 12 months prior to the receipt of the document.

1.4 Documents required for corporates, partnerships or sole traders

The individual identity of all directors, partners, sole traders and any beneficial owners with at least a 25% stake or shareholding must be verified. If electronic identity verification checks cannot achieve this, certified documents as shown in the table on the previous page will be required.

The business or company must also be verified. The documents required depend on the type of business or company. Please contact your client service team for further details. Where applicable, a certified copy of the authorised signatory list will also be required. Details on Family Investment Companies are included in the M391 document.

Note: the certification of these documents must have been completed within 12 months prior to the receipt of the document by Transact.

1.5 Documents required for trusts

The individual identity of the settlors, trustees, and named beneficiaries must be verified. Named beneficiaries of a discretionary trust can be verified upon onboarding or when they receive a payment from the trust.

If electronic identity verification checks cannot achieve this, certified documents as shown in the table on the previous page will be required.

The Trust itself must also be verified.

All of the following documents are required:

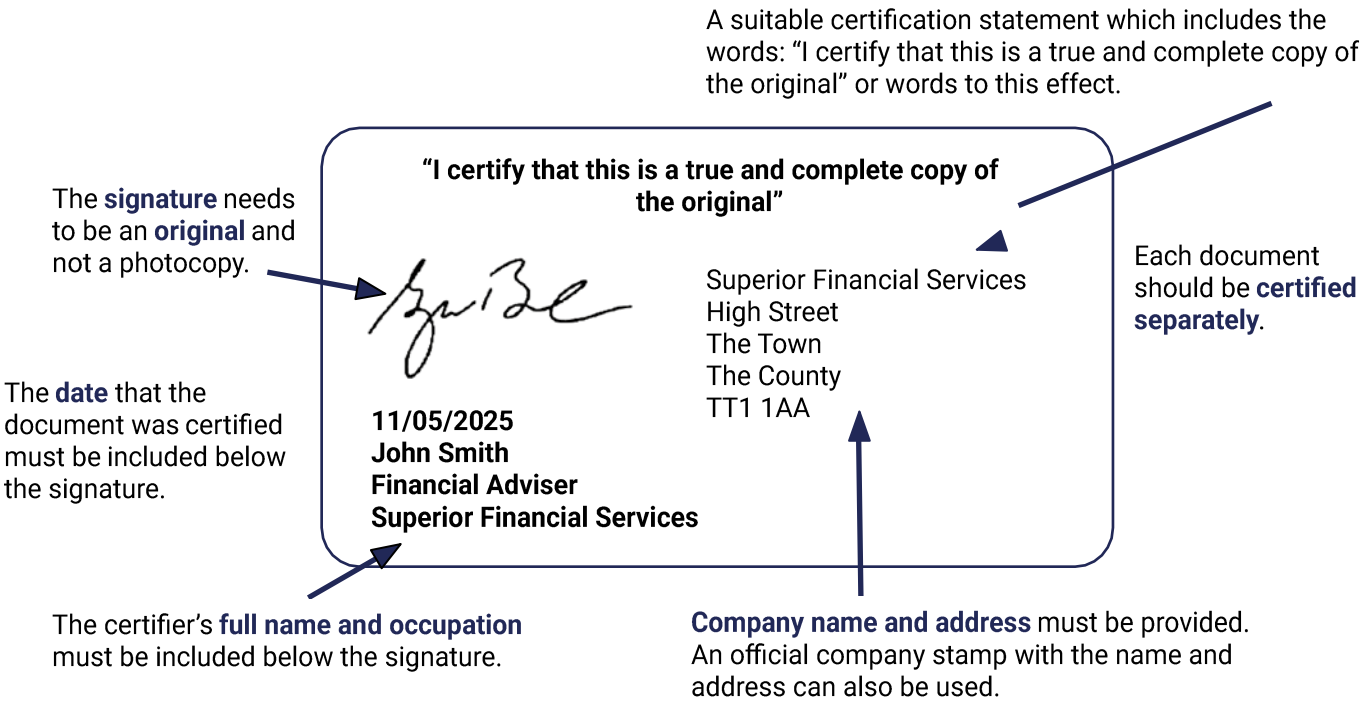
- Certified copies of the trust deed and any other documents relating to the trust (e.g. deed of appointments, deeds of variation)*.
- Where the settlor is deceased, either an original Death Certificate or an original Grant of Probate. Certified copies of these documents cannot be accepted.
- For corporate trustees (e.g. a solicitors firm), a certified copy of the authorised signature list.
- Unless specifically exempt, trusts must provide the proof of registration document from the Trust Registration Service. Please see the Trust Registration Service Guidance Notes document for further details on this.

Note: the certification of these documents must have been completed within 12 months prior to the receipt of the document by Transact.

* For a Will Trust only a certified copy of the will is needed, rather than the Trust Deed. If applicable, certified copies of the Deed of Appointment/Removal/Variation will be required.

2. AML certification requirements – documents via the post

To certify a document as a true copy, the certifier must be in possession of both the original hard copy document and a hard copy duplicate which is being certified.



Acceptable eligible certifiers external to the firm are UK and EU “professional persons”, such as:

- A solicitor, barrister or chartered legal executive (lawyer);
- A notary public;
- A chartered or certified accountant;
- An FCA approved person*;
- **For passports only** - an authorised representative of the embassy or consulate of the country that issued the passport.

*Adviser firms can authorise any individual to act as a certifier on behalf of the firm, including paraplanners.

If the certification requirements are incomplete, we will be unable to accept the certification. The documents will be returned to you to make the necessary adjustments before resubmission.

3. AML certification requirements – via Upload Documents

Upload Documents is a tool on Transact Online that allows you to submit documents electronically to Transact and eliminates the need for you to send us paper copies.

In order to upload a document as a certified true copy, the certifier must be in possession of the original hard copy document.

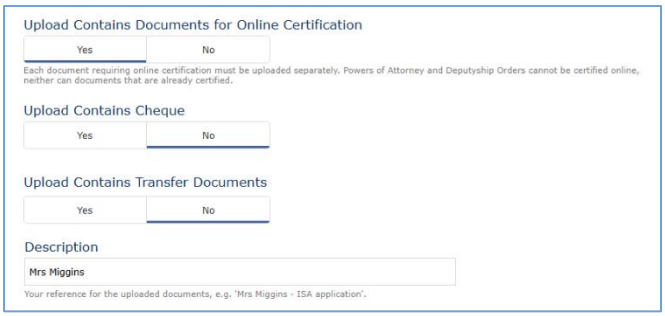
There are two ways that you can certify a document that is being uploaded.

(1) You can just upload the document. By doing this you can attest to being in possession of the original hard copy document; or

(2) Before uploading the copy document, you as the adviser can add a full suitable certification statement as shown in AML certification requirements – documents via the post in section 2 above and then upload the document.

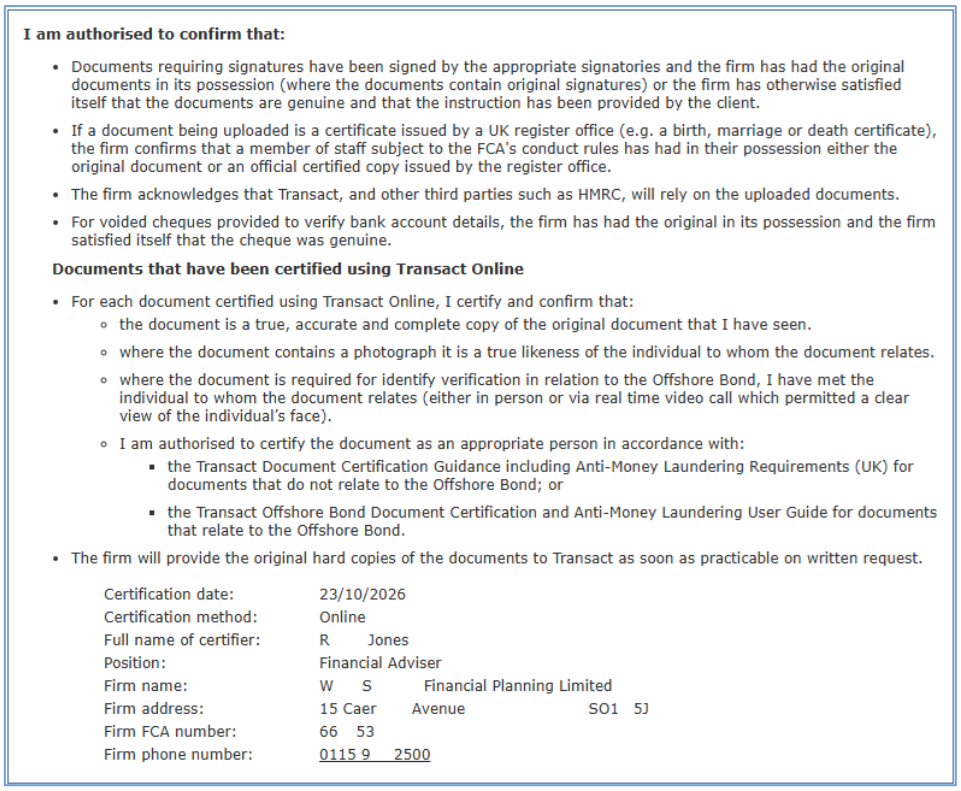
These documents must be uploaded by an FCA-approved* person. If Online Certification is required, select ‘Yes’. Select the document, click ‘Next’, and enter the certifier’s name and position.

*Adviser firms can authorise any individual to act as a certifier on behalf of the firm, including paraplanners.





Before the document is submitted, a summary will be displayed confirming the upload details, including the date of the upload and the certifier’s name and position.



I am authorised to confirm that:

- Documents requiring signatures have been signed by the appropriate signatories and the firm has had the original documents in its possession (where the documents contain original signatures) or the firm has otherwise satisfied itself that the documents are genuine and that the instruction has been provided by the client.
- If a document being uploaded is a certificate issued by a UK register office (e.g. a birth, marriage or death certificate), the firm confirms that a member of staff subject to the FCA's conduct rules has had in their possession either the original document or an official certified copy issued by the register office.
- The firm acknowledges that Transact, and other third parties such as HMRC, will rely on the uploaded documents.
- For voided cheques provided to verify bank account details, the firm has had the original in its possession and the firm satisfied itself that the cheque was genuine.

Documents that have been certified using Transact Online

- For each document certified using Transact Online, I certify and confirm that:
  - the document is a true, accurate and complete copy of the original document that I have seen.
  - where the document contains a photograph it is a true likeness of the individual to whom the document relates.
  - where the document is required for identify verification in relation to the Offshore Bond, I have met the individual to whom the document relates (either in person or via real time video call which permitted a clear view of the individual's face).
  - I am authorised to certify the document as an appropriate person in accordance with:
    - the Transact Document Certification Guidance including Anti-Money Laundering Requirements (UK) for documents that do not relate to the Offshore Bond; or
    - the Transact Offshore Bond Document Certification and Anti-Money Laundering User Guide for documents that relate to the Offshore Bond.
- The firm will provide the original hard copies of the documents to Transact as soon as practicable on written request.

Certification date:	23/10/2026
Certification method:	Online
Full name of certifier:	R Jones
Position:	Financial Adviser
Firm name:	W S Financial Planning Limited
Firm address:	15 Caer Avenue SO1 5J
Firm FCA number:	66 53
Firm phone number:	0115 9 2500

Further information regarding Upload Documents and DocuSign can be found on Transact Online (via *Information > User Guides*). Alternatively, you can speak to your Adviser Support Manager.

If the certification requirements are incomplete, we will be unable to accept the certification. Further documents covering the above requirements will then need to be re-submitted via Upload Documents.

4. Acceptable certification requirements

4.1 Overseas certifier

It is possible for us to accept certification by an eligible certifier who is located overseas (e.g. a Spanish lawyer) as long as they are an accepted professional as per our approved certifier list (as shown in in AML certification requirements – documents via the post) and can be found on an equivalent register.

The same certification approach including the certification statement needs to be used as per the AML certification requirements – documents via the post in section 2 and AML certification requirements – via Upload Documents in section 3.

The certification of these documents must have been completed within 12 months prior to the receipt of the document.

4.2 Copies of copies

Generally, we cannot accept copies of copies, the only exceptions being trust deeds or Power of Attorney documentation (where the portfolio is to remain with Transact). Note there are different certification requirements for Power of Attorney documents, please see the Power of Attorney and Deputyship user guide for further information.

Note: our definition of a "copy of a copy" is a certified copy of a previously certified copy. In other words, in the very limited situations where we will accept it, the document must contain two certification statements and the latest should be by an eligible certifier as shown in AML certification requirements – documents via the post in section 2.

The same certification approach including the certification statement needs to be used as per the AML certification requirements – documents via the post and AML certification requirements – via Upload Documents (above).

The latest certification of these documents must have been completed within 12 months prior to the receipt of the document by Transact.

5. Maintaining a client's portfolio – certification requirements

At various points after the initial AML checks carried out to open a client's portfolio, additional certified documents may be required to verify details such as name change, change of marital status or adding a trust.

This section covers the different requirements for:

- Acceptable documents for marriage, birth, death certificates and grant of probate;
- Acceptable certification for powers of attorney.

If the requirements in this section are not met, we may have to reject the certificated documents. They will then need to be resubmitted with the necessary adjustments (depending on how they were originally sent to us, i.e. postal hard copies or via Upload Documents).

We may not have covered all scenarios in this guide. Our Name Change User Guide may be of use, should you have any further queries please refer these to your client service team.

5.1 Marriage, birth, death certificates and grants of probate

We are not allowed to accept certified photocopies – in paper form – of marriage, death, birth certificates and grants of probate. Instead, you can either post us a duplicate original, which the relevant registry will provide, or you can upload a scanned image of the original marriage, birth, death certificates and grant of probate documents via Upload Documents.

When you upload the document you will be presented with a number of statements and attestations that you need to confirm are true, such as:

"If a document being uploaded is a certificate issued by a UK register office (e.g. a birth, marriage or death certificate), the firm confirmed that a member of staff subject to the FCA's conduct rules has had in their possession either the original document or an official duplicate issued by the register office".

By confirming this you have attested that you have seen the original document.

5.2. Powers of attorney

Please refer to our specific Power of Attorney and Deputyship user guide.

"Transact" is operated by Integrated Financial Arrangements Ltd, 4th Floor, 2 Gresham Street, London EC2V 7AD | Tel: (020) 7608 4900 | Email: info@transact-online.co.uk | Web: www.transact-online.co.uk | (Registered office: as above; Registered in England and Wales under number: 03727592) | Authorised and regulated by the Financial Conduct Authority (entered on the Financial Services Register under number: 190856)