

# Safeguard Guide for Religious Organisations

November 2021

# What is HSBC Safeguard?

As part of our commitment to fight fraud and financial crime, we need to make sure we hold the right information about you and your organisation. Having accurate information about all our customers is a key part of our ability to detect and deter fraudulent transactions, money laundering and tax evasion. This is what we call **Safeguard**.

During the review, we'll ask you to confirm, update or give us new information.

Your review needs to be completed within the advised timescale to maintain the operation of your account(s) with us.

We understand this may be the first time you've had to complete a Safeguard review and that you may volunteer to help your organisation in your spare time. This guide should help to highlight the key steps in the process, the support available to you and the information we'll be asking you to confirm.

Thank you for your assistance.

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# Recommended actions to take before your Safeguard review

## HSBC Mandate

Our Safeguard Team can only discuss the review with parties listed on the mandate. If you're unsure of who may be listed on the mandate, any member of the organisation can call Business Telephone Banking on **0800 032 1770** (UK) or **+44 144 242 2929** (outside UK) to receive guidance on the process for requesting and/or updating mandates.

## Information available via public sources

If your organisation is registered with the Charity Commission, please make sure the details held there are correct. Where possible, sections of the online form will be pre-populated with information available from public sources and our own Bank records. We understand that not all organisations are required to register with the Charity Commission so this may not be applicable.

## Correspondence address

We'll write to you in advance of your scheduled review, so please make sure your correspondence address on our records is up to date. You can check your correspondence address using the following methods:

1. Business Internet Banking (if registered).
2. Business Telephone Banking (if registered) on **0800 032 1770** (UK) or **+44 144 242 2929** (outside UK).
3. by visiting your nearest HSBC branch. You'll need to be a signatory on the mandate, so please bring identification with you.

# How will you be notified of your Safeguard review?

You'll receive one of two notification letters as your review approaches. These will contain one of the two references below:

- ◆ **BIBL1** – this letter confirms you'll need to complete your online Safeguard review using Business Internet Banking (BIB). The review will be available to the BIB Primary User only. No action is required until the online form becomes available within BIB.

or

- ◆ **OTPL1** – this letter confirms you'll need to complete your online Safeguard review using the HSBC website. This process is also known as One-Time Password (OTP). To do this, we need you to provide us with the name of the individual who'll be completing the Safeguard review and their mobile number and email address. You can provide this information by phone or in writing (details will be included within the letter).

# Timelines for completing your Safeguard review

Once your review is live, you'll be provided with a deadline for completion. This is known as the 'Due' or 'Completion' Date and the online form must be fully completed and submitted ahead of this date.

If the review is incomplete on the 'Due' or 'Completion' date, a written notice of intention to close the account(s) will be issued in writing. This notice period lasts for 70 days – if the review is still incomplete at the end of this period, all account(s) will be closed.

# How to access your Safeguard review

## Using Business Internet Banking

The online form will automatically load when the Primary User logs in to Business Internet Banking.

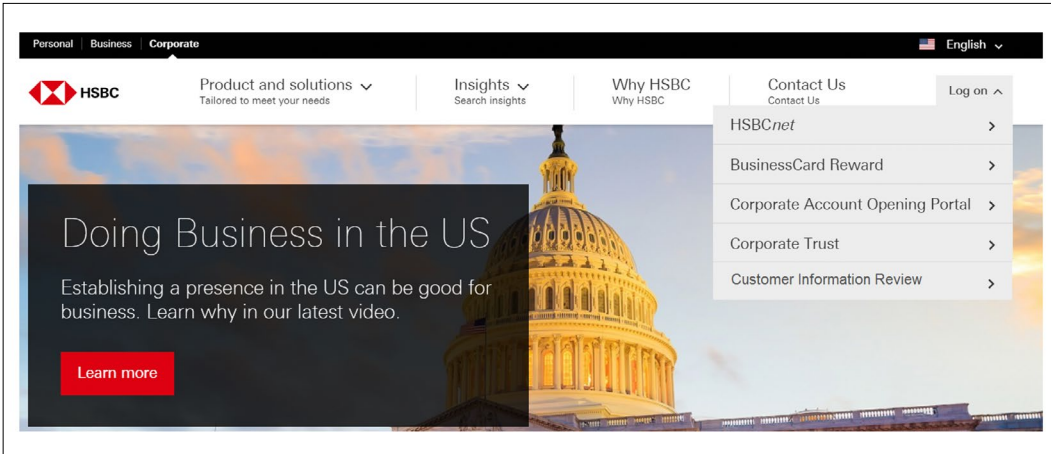
If the Primary User is unable to access the online form, please contact the Safeguard Team for help.

## Using the HSBC website (for One-Time Password)

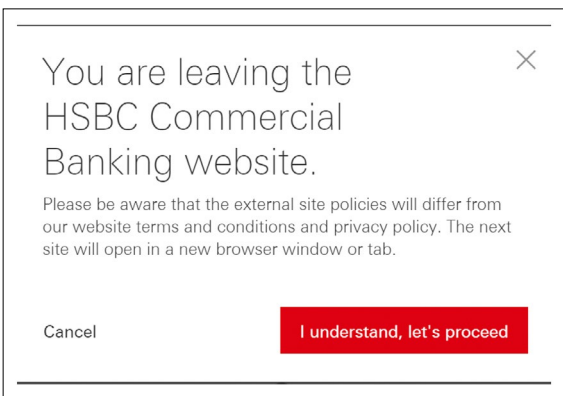
You'll only be able to access the review using the website when you've provided the contact details of the individual from the organisation who'll be completing the review. Please see the 'How will you be notified of your Safeguard review?' section.

Once provided, the point of contact will receive an email with instructions of how to log in (summarised below). This email will also contain the unique reference code that will be needed to access the online form.

1. Visit our website **business.hsbc.uk**.
2. Expand the drop-down menu under the 'Log on' button in the top right-hand corner of the page.
3. Select 'Customer Information Review'.



4. Click on the 'I understand, let's proceed' button to continue to the review portal.



5. Enter the reference code received by email, tick the confirmation statement and press the 'Confirm' button.

Completing your form

Thank you for proceeding to HSBC Safeguard – Protecting you from Fraud and Financial Crime.

To retrieve your current details and complete your form, you will need to enter the reference code we sent you.

We will then send a one-time verification code to your mobile device to start the process.

Enter your reference code

By clicking on the Confirm button below, you agree to the [Cookie Policy](#) and [Privacy Statement](#). You also confirm that you are authorized by the legal entity or party you represent to access this Site and to provide the information and documentation necessary for review on their behalf.

If further information is required, please call us at 08000 304 516 or if you're calling from abroad, +44 1470 697 029 between 9:00am – 5:30pm Monday to Friday, and we will be happy to help.

**Confirm**

6. Select 'Send Code'. A text message will be issued to the point of contact's mobile number, containing the one-time password.

Completing your form

Reference code L8SKWF

The details you have entered match.

Your verification code will be sent to .

Send Code

If further information is required, please call us at 08000 304 516 or if you're calling from abroad, +44 1470 697 029 between 9:00am – 5:30pm Monday to Friday, and we will be happy to help.

7. Enter the one-time password into the pop-up window and select 'Confirm'. The online form will then load. If required, you can select 'Resend code' to receive the one-time password again.

Completing your form

The details you have entered match.

Your verification code has been sent to +3569\*\*\*8817

Enter the one-time password you have received.

Please click Resend if the SMS does not arrive in the next 2 minutes.

Once you receive the SMS the verification code will expire within 240 seconds. The expiration of the verification code is in place to protect your online security.

Resend code

If further information is required, please call us at 08000 304 516 or if you're calling from abroad, +44 1470 697 029 between 9:00am – 5:30pm Monday to Friday, and we will be happy to help.

Confirm

## Available Support

A **Live Chat** facility is available within the form. This can be accessed by clicking the link on the 'Need help?' icon on the right of the screen. Live Chat is available Monday to Friday, 9am to 5.30pm.

**Welcome to the HSBC Safeguard**

Our systems rely on having the most up-to-date customer information to do their job of detecting financial crime and allow HSBC to service you better. To do this, we need you to update your personal and company or organisation information with us.

***Please complete your review ahead of the due date indicated at the top of this page.***

Please note that any reference to 'Country' throughout the following forms covers countries and territories.

**Let's get started**  
During the update, we'll require information on the following areas:

- Your core business or organisation details
- How you intend to use your account
- The owners and individuals that make key decisions on behalf of your business or organisation
- The funding of your business or organisation, originally and in the future

To simplify the process for you, each section has been pre-populated with the information we already hold. Please review the information in each section and provide us with any updates where appropriate.

Need help?

Our virtual assistant can also be accessed by this tab.

Additional information including a Frequently Asked Questions section and an Identification and Verification (ID&V) guide can be found on our website, [business.hsbc.uk/safeguard](https://business.hsbc.uk/safeguard).

There's also a dedicated Safeguard telephone line: **0800 030 4516\*** available Monday to Friday, 9am to 5.30pm. If you receive notification of an online review but don't have access to the internet, please call the Team and they'll advise you of the next steps.

\* We're open Monday to Friday, 9am to 5.30pm (excluding Bank Holidays). To help us improve our service, and in the interest of security, we may monitor and record your call. If you're calling from outside the UK, please dial +44 1226 260 878. If you need a Text Relay service, you can download the 'Relay UK' app and call our number from within it. For other accessible ways to contact us, please visit: [business.hsbc.uk/accessibility](https://business.hsbc.uk/accessibility).

## Completing your Safeguard form

The online form is split into a number of sections, all of which are mandatory. Where possible, each section of the form will be pre-populated with information we already hold. Please review the information in each section and provide us with any updates where applicable.

Each question has an 'information icon' which, when hovered over with your mouse or cursor, provides additional detail to help you with your answer.

Once you have completed your form, our Team will review the information provided. If we need more information or clarification, we'll notify you.

Below is guidance which we hope will be useful in assisting you with completing the online form. You're required to provide information relating to the religious organisation the account is held by, not the regional or national body which may govern you.

## Section One – Basic Details

### **Q: Does your organisation operate under a different name?**

Please provide any associated names not already listed underneath 'Full legal name of your organisation'. Please select 'Not Applicable' if there are no additional names.

### **Q: Please provide one of the following: incorporation number, your registration number or an equivalent organisation identification number.**

Please only enter a charity number, if this is unique to the religious organisation being reviewed or you're a branch with the same charity number, address etc. as the main charity.

If you're exempt from registration provisions under Statutory Instrument 2014 No. 242, please enter 0000000 (seven zeros).

### **Q: What was your date of establishment/registration/formation?**

If you're registered, use the date of registration, otherwise this will be the date your organisation was set up or started to operate as a religious organisation (not the formation of the overarching religious organisation).

## Section Two – Organisation Details

### **Q: What is the purpose of your organisation?**

This is a free-format field and may have been pre-populated with information already available to the Bank. Please review and expand on the description provided. Examples include:

- ◆ Spreading the word of God.
- ◆ Offering service.
- ◆ Providing worship.
- ◆ Fellowship.
- ◆ Discipleship.
- ◆ Ministry.

If you're registered with a charity regulator, your description should be the same as shown on their records.

### **Q: Does the organisation perform a business related activity?**

Examples of business related activities include an organisation being funded by operational/commercial activities through the sale of goods, hosting events or performance of services. There's a free-format text box for you to provide further detail if you answer 'yes' to this question.

### **Q: Is your organisation registered or regulated by a government authority (state, federal or international body)?**

If you're listed with The Charity Regulators or are a branch with the same charity number, address etc. as the main charity, answer 'yes'. Please note, this relates to the organisation this review is for and not the regional or national body.

### **Q: Please provide the reason why your organisation isn't registered or regulated.**

In England or Wales, most religious organisations must register with the Charity Commission if they're based in England or Wales and have over £100,000 income per year. If the organisation's income is below this, please state "below registration threshold" as your answer. If you're exempt or excepted from registration, please state 'exempt from registration' and provide the details of why.

### **Q: In your normal day-to-day activity, do you make or intend to make payments on behalf of your clients?**

A 'client' refers to your customers, members, congregation, beneficiaries, trustees etc. who are the recipients of your products/ services. Answer 'yes' if you're making payments using clients' money. This includes the provision of interest-free loans.

### **Q: Is your organisation involved in any non-banking financial activity?**

Non-banking financial activity includes money service activities and financial services such as fund management, financial advice, insurance, cheque encashment and currency exchanges. An institution involved in these activities doesn't hold a full-fledged banking licence from a regulator in their area of operation. Examples of non-bank financial institutions include insurance firms, venture capitalists, currency exchanges.

### **Q: Does your organisation have any operation or revenue outside of the country where the account is maintained?**

Where the religious organisation operates solely in the UK, for example all physical premises and revenue generation are with the UK, please select 'no'. Where international operations are undertaken, select 'yes' and further questions will be asked so that you can provide detail.

**Q: Does your organisation accept donations?**

An individual or entity (for example, clubs or businesses) who provides funding (one-off or regular) would be considered as a donor. Donors surrender ownership and control of the donated funds to the religious organisation. If your organisation accepts donations, select 'yes' and further questions will be asked so that you can provide detail.

**Q: Does the organisation give funds directly to an Ultimate Beneficiary or provide funds to an Intermediate Beneficiary?**

Please use the following definitions to assist with your answer:

- ◆ Ultimate Beneficiary: individuals, groups or a project that receives benefits of funding from your organisation.
- ◆ Intermediate Beneficiary: used to ensure that the benefits or funding reach the intended Ultimate Beneficiaries.

**Q: Is the entitlement percentage of the Beneficiary(ies) fixed?**

If a set percentage of donations/revenue is passed to a beneficiary, please select 'yes'. For example, if 10% of donations received must be passed to a central body.

**Q: Please provide details on the controls your organisation has in regards to the donors for managing money laundering and terrorist financing risks.**

Examples of controls include:

- ◆ A donation acceptance policy, which includes a maximum amount of cash that can be received in a single donation.
- ◆ A requirement to record details of donors where their donation exceeds a stated amount.
- ◆ Circumstances where a donation will be rejected.

**Q: Do you have a Sole Authorised Signatory?**

Answer 'yes' if there's an Authorised Signatory with sole authority over the religious organisation's account or financial affairs. Where more than one individual has access to an account, answer 'no'.

## Section Three – Contact Details

**Q: What is the registered address of the organisation?**

If applicable, this address can be typically found on the organisation registration documents. For branches, the registered address should be the address of the entity that the branch is attached to.

We're aware this question is being presented to unregistered organisations and have asked our IT department to correct this. Please enter the principal organisation address (see below) here if you aren't a registered organisation.

**Q: What is your principal organisation address?**

This is the main place of physical operation or the geographical address of the religious site.

**Q: Is the correspondence address the same as the registered address?**

The correspondence address is typically where your post is received.

**Q: Does your organisation have a Tax Identification Number (TIN)?**

Within the UK, this will be the Unique Taxpayer Reference (UTR). The format is a unique set of 10 numerals allocated automatically by HMRC and used to submit a tax return. Your UTR can typically be found on any self-assessment forms such as a statement or tax returns you submit to HMRC.

If the organisation is exempt for tax returns, please enter 'no' and under the question, 'What is the reason for not having a Tax Identification Number?', select the option, 'Country Tax authority does not require the TIN to be disclosed'.

## Section Four – Financial Information

**Q: What was the initial source of investment(s) or funds to start your organisation?**

From the drop-down, please select all significant sources of funds used when the organisation was first established.

Where this information is no longer available due to the age of the organisation, please select 'Unknown' and enter the amount as zero. Please provide supporting commentary in the free-format box that appears.



## Section Five – Sanctions Exposure

We are committed to complying with the sanctions laws and regulations of the European Union, Hong Kong, the United Kingdom, the United Nations, and the United States, as well as other applicable sanctions laws and regulations in the jurisdictions in which HSBC operates (subject to the primacy of local laws and regulations). We may agree to process certain transactions, in its sole discretion, such as those which relate to humanitarian aid of which are otherwise permitted by a licence from an appropriate authority. These transactions are considered on a case-by-case basis and must be submitted in advance to us for consideration and approval. If you wish to make a charitable donation or provide humanitarian aid to a sanctioned country, as detailed on the review, please call Business Telephone Banking on **0800 032 1770** (UK) or **+44 144 242 2929** (outside UK).

## Section Six – Connected Parties

Connected parties are people or entities who are responsible for running your organisation and/or running your account with us. An organisation must have at least one connected party.

The form is pre-filled with the connected parties we're aware of. You may need to add and/or remove connected parties if these details have changed.

We may require identification and verification documents for selected connected parties. Where this is required, we'll invite you to upload using a smartphone via our HSBC Identify app. We understand this may not be possible for everybody – please call the Safeguard line if you need to discuss the available options.

For each connected party, you'll be asked to confirm their role within the organisation. A definition for each potential role is provided within the form and you must select 'yes' or 'no' for each one. The following are common roles associated with organisations:

### Senior Management

Also known as a Key Controller. This individual or entity is responsible for running the organisation. They make the day-to-day decisions on how the account and funds are used. Examples include treasurers, secretaries and chairpersons. Organisations can have multiple individuals or entities who are considered to be Senior Management. We require every individual or entity who is considered Senior Management to be added to the online form.

### Authorised Signatory

An individual who is the only Authorised Signatory/Authorised Bank Signatory for the organisation as per the Bank mandate.

### Q: What is their Tax Identification Number (TIN)?

For UK individuals, this will be the National Insurance Number. For entities it's their Unique Taxpayer Reference (UTR). Tax information is required to comply with the Foreign Account Tax Compliance Act (FATCA).

### Q: Does the connected party currently hold (or has ever held) a diplomatic or government position, including local government positions?

Please answer 'yes' if they hold (or have held) one of the following roles:

- ◆ Head of state or Head of Government
- ◆ Senior Civil Servant in National Government
- ◆ Head of Regional Government
- ◆ Senior/high profile politician
- ◆ Senior Executive of any state-owned enterprises
- ◆ State agency official
- ◆ Large City Mayor
- ◆ Senior member of the national police service, law enforcement agency or intelligence services
- ◆ Ambassador
- ◆ Senior Executive of any national NGO
- ◆ Political pressure group/labour group senior official
- ◆ Senior member of the judiciary
- ◆ Head of a Supranational Body (United Nations, IMF, WB)
- ◆ Senior member of a diplomatic group (e.g. Ambassador)
- ◆ Member of a ruling Royal Family
- ◆ National Government minister
- ◆ Member of the national legislature
- ◆ Deputy National Government minister
- ◆ State Corporation Executive
- ◆ Regional Government Executive
- ◆ Political party officials
- ◆ High Ranking Military Official/Personnel

## We're here to help

Information including a Frequently Asked Questions section and an Identification and Verification (ID&V) guide can be found on our website, [business.hsbc.uk/safeguard](https://business.hsbc.uk/safeguard).

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## Accessibility

**If you need any of this information in a different format, please let us know. This includes large print, braille, or audio. You can speak with us using the live chat service on our website, by visiting one of our branches or by giving us a call.**

There are also lots of other options available to help you communicate with us. Some of these are provided by third parties who are responsible for the service. These include a Text Relay Service and a British Sign Language (BSL) Video Relay Service. To find out more, please get in touch. You can also visit: [business.hsbc.uk/accessibility](https://business.hsbc.uk/accessibility) or [business.hsbc.uk/contact-us](https://business.hsbc.uk/contact-us).

### **business.hsbc.uk**

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**Customer Information:** Customer Service Centre, BX8 1HB.

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