

<b>Identity (ID) for Bank Account Applications for all prisoners.</b>		
<b>This instruction applies to :-</b>		<b>Reference :-</b>
<b>Prisons</b>		<b>PSI 44/2011</b>
<b>Issue date</b>	<b>Effective Date</b>	<b>Expiry Date</b>
22 July 2011	1 August 2011	1 August 2013
<b>Issued on the authority of</b>	NOMS Agency Board	
<b>For action by</b>	Governors and Directors of contracted prisons, Offender Supervisors, YOT Supervising Officers	
<b>For information</b>	All prison staff, particularly Offender Management and Resettlement and Heads of Learning and Skills	
<b>Contact</b>	Bruce Davison, Reducing Re-offending Team 030 0047 5617 Jasber Jittlar, Reducing Re-offending Team 07834 515 601	
<b>Associated documents</b>	PSO 4465 - PRISONERS FINANCIAL AFFAIRS PSO 6400 – DISCHARGE PSO 4620 – CONFISCATION ORDERS	
Replaces the following documents which are hereby cancelled :-  PSI 45/2007 Education Maintenance Allowance (EMA) and Identity (ID) for Bank Account Applications by young people (16-18 years of age)		
<b>Audit/monitoring :</b>  None		
Introduces amendments to the following documents.  None		

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Annex A	<a href="#">Personal Identification Document</a>	Staff designated by Governors/Directors to complete Personal Identification Documents, Offender Supervisors, YOT Supervising Officers
EIA	<a href="#">Equality Impact assessment</a>	All prison staff

**1. Executive summary**

1.1 This PSI provides instructions on how to provide prisoners with the identification required to open a bank account.

1.2 This PSI amends PSI 35/2009; it removes information and guidance on Education Maintenance Allowance (EMA). The Education Maintenance Allowance (EMA) scheme was closed to all new application from 1 January 2011. From September 2011, EMA will be replaced with a bursary, which schools, colleges and training providers will be responsible for awarding.

**Background**

1.3 This instruction sets out how prisons should complete a Personal Identification Document for prisoners who wish to open a bank account. This document only requires prisons to confirm the identity information that is held in prison records. We and the banks recognise that prisons rarely have documentary evidence to support this information.

**Desired outcomes**

1.5 To support prisoners in applying to open bank accounts. Bank accounts have become increasingly important when living in the community. Some benefits require a bank account to be opened but in other cases access to benefits such as Housing Benefit is facilitated by having banking facilities available. Imprisonment provides a good opportunity to assist offenders to open bank accounts and thus be better prepared for life after release. It is, therefore, advantageous for prisoners to open bank accounts and establishments should assist them to do so.

**Application**

1.6 All staff for information. Governors and Directors, Offender Supervisors and Youth Offending Teams supervisors for action.

In this document Governor/s also refers to Director/s of contracted prisons.

### Mandatory actions

- 1.7 *Governors and Directors must ensure that the Personal Identification Document at Annex A is used to provide prisoners with the necessary identification to open a bank account. The form provides identity details and a discharge address to the bank, if no discharge address is known, or changes, the bank must be informed and the discharge address must correspond with that at final discharge.*
- 1.8 *Governors and Directors must identify and authorise appropriate staff to complete the Personal Identification Document (Annex A) and appropriate managers to sign it.*

### Resource Impact

- 1.9 There may be resource implications for senior managers in checking and signing off ID forms and in the preparation of the documentation for sign off and communicating with the relevant bank.

## **2. Operational instructions**

- 2.1 *When a prisoner asks for assistance in applying to open a bank account the form at Annex A must only be completed by staff authorised by the Governor. The form confirms a prisoner's identity as recorded in prison records and provides the bank with the prisoner's personal information and proposed discharge address.*
- 2.2 *The form must then be passed to a manager designated by the Governor for confirmation that the ID details match those held on the court / prison records and to confirm that the photograph is a true likeness of the applicant.*
- 2.3 *The form is for **bank use only** and must not be given to the prisoner directly on any occasion. The form must not be used for any other purpose than to support a prisoner in gaining a bank account.*
- 2.4 *A copy of the ID Form must be kept in the main record, F2050, and / or on P-NOMIS.*
- 2.5 *At discharge the address given must be checked against the ID Form and the bank informed if this has changed.*
- 2.6 *All the bank account application documents must be handled using the PROTECT level of data security:*

### External Distribution

- 2.7 *Enclose the form in an inner sealed envelope showing the protective marked PROTECT – PERSONAL. Mail in a second sealed envelope, by post or DX.*
- The outer envelope must not show the protective marking, but should include a return address in case of failed delivery.***

### 3. Guidance

- 3.1 Access to bank accounts requires evidence of identity (ID). A primary reason for this is to prevent accounts being opened for the purposes of money laundering. The Financial Services Authority (FSA) has the power to fine banks which do not follow the guidelines issued by The Joint Money Laundering Steering Group (JMLSG). For those resident in the community, banks tend to require the production of identity documents such as passport, driving licence or birth certificate and three months' utility bills.
- 3.2 The JMLSG recognise the difficulty that most prisoners would have in meeting requirements for the production of identity documentation and have therefore agreed the procedures described in this document.
- 3.4 The British Banking Association which represents the interests of the retail banking sector has agreed to the use of Annex A and has advised its members accordingly.
- 3.5 The completion of the form **does not** mean that a bank will automatically accept it as ID for the purpose of opening an account.
- 3.6 Prisoners will only be able to open a Basic bank account. This will usually:
- receive money;
  - give them a cash card;
  - let them set up Direct Debits or standing orders to pay bills;
  - act as a stepping stone to a current account;
  - allow them to do business at the bank counter;
  - let them check their balance and withdraw cash at Post Office® branches; and
  - let them check their balance and withdraw cash from a cash machine.
- However, this won't usually allow them to go overdrawn by more than £10, if at all. It may offer:
- a debit card; and
  - a linked savings account to help them budget.
- PSO 4465 and PSO 2300 provide further guidance on the use of bank accounts by prisoners.
- 3.7 Governors may find it helpful to establish links with local banks to facilitate the opening of prisoners' bank accounts.
- 3.8 Where Establishments already have effective arrangements in place with a bank, these may continue and alternative ID arrangements may be used.
- 3.9 To assist prisons and banks in putting in place procedures for the opening of accounts, UNLOCK has produced detailed guidance for prisons on best practice in developing and delivering bank account opening arrangements for prisoners. This can be located on the NOMS intranet. NOMS is grant aiding UNLOCK during 2011/12 to offer continued support.

(signed)





Ministry of  
**JUSTICE**

National Offender  
Management Service

## PERSONAL IDENTIFICATION DOCUMENT

I am willing for this form to be passed to *[insert name of bank]* to help me to apply for a Basic bank account, and to notify the bank of the address I will be living at when I am released.

Name.....

Nationality ..... Place of Birth.....

Signature..... Date.....

Upon my release I will be living at the following address. I understand that I *must* confirm my address to the bank within 7 days of my release from custody. *(If the address is not known at time of completing the application this section must be completed when known, and confirmed at the Discharge Board (any changes must be communicated to the bank)).*

.....  
.....

### Witnessed by

.....

Position of witness [*must* be an employee of the prison]

.....

### Signature of witness

.....

***The following sections must be signed by an authorised manager***

Applicant's Full Name

.....

Applicant's Date of Birth .....

Applicant's Current Address (HMP/YOI)

.....

.....

**Applicant's Photograph (to be affixed here)**

Expected Release Date.....

Address immediately prior to custody

.....

.....

**Verification of name and address by HMP .....****I certify that the name and address details supplied above match those on the court/prison records related to the applicant shown above.****I confirm that the photograph is a true likeness of the applicant.**

Name .....Position .....

e-mail address .....@hmps.gsi.gov.uk

Direct telephone line .....

**Signature ..... Date .....**



# HQ policy

## *Equality Impact Assessment – Annex*

<b><i>Policy</i></b>	Reducing Re-Offending
<b>Policy lead</b>	Ian Galbraith
<b>Group</b>	Rehabilitation Services Group
<b>Directorate</b>	Commissioning and Commercial

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## What is an Equality Impact Assessment (EIA)?

An EIA is a systematic appraisal of the (actual or potential) effects of a function or policy on different groups of people. It is conducted to ensure compliance with public duties on equality issues (which in some areas go beyond a requirement to eliminate discrimination and encompass a duty to promote equality), but more importantly to ensure effective policy making that meets the needs of all groups.

Like all other public bodies, the National Offender Management Service is required by law to conduct impact assessments of all functions and policies that are considered relevant to the public duties and to publish the results.

An Equality Impact Assessment must be completed when developing a new function, policy or practice, or when revising an existing one.

*In this context a **function** is any activity of the Prison Service, a **policy** is any prescription about how such a function is carried out, for instance an order, instruction or manual, and a **practice** is the way in which something is done, including key decisions and common practice in areas not covered by formal policy.*

**If you are completing this document as part of the OPG process, you must complete and return it together with the final Business case for OPG approval and publication alongside the PC/PSI**

## Your Equalities team

It is important that all policies are informed by the knowledge of the impact of equalities issues accumulated across the organisation. Early in the policy development process, and before commencing the EIA, please contact the relevant equalities team to discuss the issues arising in your policy area.

- HR issues – Staff Diversity and Equality Team – 020 7217 6090 or [frank.colyer@noms.gsi.gov.uk](mailto:frank.colyer@noms.gsi.gov.uk)
- Service delivery issues relating to gender and younger offenders – Women and Young People's Group – 020 7217 5048 or [matthew.armer@noms.gsi.gov.uk](mailto:matthew.armer@noms.gsi.gov.uk)
- All other service delivery issues – Race and Equalities Action Group – 020 7217 2521 or [REAG@noms.gsi.gov.uk](mailto:REAG@noms.gsi.gov.uk)

## The EIA process

The EIA has been constructed as a two-stage process in order to reduce the amount of work involved where a policy proves not to be relevant to any of the equalities issues.

The initial screening tool should be completed in all cases, but duplication of material between it and the full EIA should be avoided. For instance, where relevance to an equalities issue is self-evident or quickly identified this can be briefly noted on the initial screening and detailed consideration of that issue reserved for the full EIA.

Further guidance on this will be given by the relevant equalities team.

## Stage 1 – initial screening

The first stage of conducting an EIA is to screen the policy to determine its relevance to the various equalities issues. This will indicate whether or not a full impact assessment is required and which issues should be considered in it. The equalities issues that you should consider in completing this screening are:

- Race
- Gender
- Gender identity
- Disability
- Religion or belief
- Sexual orientation
- Age (including younger and older offenders).

## Aims

### What are the aims of the policy?

To provide an agreed procedure for Prison Establishments to provide identification to banks to support the opening of bank accounts by those in custody.

## Effects

**What effects will the policy have on staff, offenders or other stakeholders?**

It will remove some of the barriers that prisoners can experience in trying to open bank accounts and thus reduce financial exclusion.

## Evidence

**Is there any existing evidence of this policy area being relevant to any equalities issue?**

*Identify existing sources of information about the operation and outcomes of the policy, such as operational feedback (including local monitoring and impact assessments)/Inspectorate and other relevant reports/complaints and litigation/relevant research publications etc. Does any of this evidence point towards relevance to any of the equalities issues?*

There is no evidence of equalities issues being relevant.

## Stakeholders and feedback

**Describe the target group for the policy and list any other interested parties. What contact have you had with these groups?**

Prisoners, prisons, banks and some third sector organisations. There has been extensive consultation with interested parties, within NOMS and with a sample of prisons. The draft PSI has been agreed with the Joint Money Laundering steering Group and the British Bankers' Association.

**Do you have any feedback from stakeholders, particularly from groups representative of the various issues, that this policy is relevant to them?**

Not from an equalities perspective.

## Impact

**Could the policy have a differential impact on staff, prisoners, visitors or other stakeholders on the basis of any of the equalities issues?**

The only relevance identified is that whilst most prisoners will open 'basic bank accounts' for some younger prisoners there may be young persons accounts that will be more appropriate and some Muslims may opt for a Sharia compliant account. Neither creates any problems or conflict with the PSI.

## Local discretion

**Does the policy allow local discretion in the way in which it is implemented? If so, what safeguards are there to prevent inconsistent outcomes and/or differential treatment of different groups of people?**

Yes. The PSI provides the procedure and encourages Prisons to actively support prisoners in opening bank accounts but there will be differential uptake which will be partly dependent on the prison and partly on partner banks for some time. This should not impact differentially on different groups.

## Summary of relevance to equalities issues

Strand	Yes/No	Rationale
Race	No	No race bias in banking arrangements though some evidence that some ethnic groups less

likely to access banking and this PSI may, in a small way, help correct this imbalance.

<b>Gender (including gender identity)</b>	No	No gender bias in banking arrangements
<b>Disability</b>	No	Braille and audio information available from banks.
<b>Religion or belief</b>	No	Some Sharia compliant accounts will be opted for but widely available.
<b>Sexual orientation</b>	No	No sexual orientation bias in banking arrangements
<b>Age (younger offenders)</b>	No	Young Persons accounts may be more suitable for some but no practical difference.
<b>Age (older offenders)</b>	No	No age bias in banking arrangements.

If you have answered 'Yes' to any of the equalities issues, a full impact assessment must be completed. Please proceed to STAGE 2 of the document.

If you have answered 'No' to all of the equalities issues, a full impact assessment will not be required, and this assessment can be signed off at this stage. You will, however, need to put in place monitoring arrangements to ensure that any future impact on any of the equalities issues is identified.

## Monitoring and review arrangements

**Describe the systems that you are putting in place to manage the policy and to monitor its operation and outcomes in terms of the various equalities issues.**

A short term project using a third sector organisation to facilitate arrangements between prisons and banks at a strategic and local level is continues in place. No new monitoring system will be introduced but occasional censuses will continue to be used. Will be considered for inclusion in SBC processes.

**State when a review will take place and how it will be conducted.**

At end of project mentioned above. Process to be decided when project in place. Time scale – summer 2011.

	<b>Name and signature</b>	<b>Date</b>
<b>Policy lead</b>	Ian Galbraith	
<b>Head of group</b>	Lori Chilton	