



BSI Standards Publication

Specification for the maintenance of financial services customer data

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Foreword

This PAS was sponsored by the TISA – the financial services pan-industry association. Its development was facilitated by BSI Standards Limited and it was published under licence from The British Standards Institution. It came into effect on 31 March 2015.

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The PAS process enables a specification to be rapidly developed in order to fulfil an immediate need in industry. A PAS can be considered for further development as a British Standard, or constitute part of the UK input into the development of a European or International Standard.

Information about this document

Product certification. Users of this PAS are advised to consider the desirability of third-party certification of product conformity with this PAS. Users seeking assistance in identifying appropriate conformity assessment bodies or schemes may ask BSI to forward their enquiries to the relevant association.

Assessed capability. Users of this PAS are advised to consider the desirability of quality system assessment and registration against the appropriate standard in the BS EN ISO 9000 series by an accredited third-party certification body.

Use of this document

It has been assumed in the preparation of this PAS that the execution of its provisions will be entrusted to appropriately qualified and experienced people, for whose use it has been produced.

Presentational conventions

The provisions of this PAS are presented in roman (i.e. upright) type. Its requirements are expressed in sentences in which the principal auxiliary verb is "shall". The word "should" is used to express recommendations of this standard. The word "may" is used in the text to express permissibility, e.g. as an alternative to the primary recommendation of the clause. The word "can" is used to express possibility, e.g. a consequence of an action or an event.

Commentary, explanation and general informative material is presented in smaller italic type, and does not constitute a normative element.

Spelling conforms to The Shorter Oxford English Dictionary. If a word has more than one spelling, the first spelling in the dictionary is used.

Contractual and legal considerations

This publication does not purport to include all the necessary provisions of a contract. Users are responsible for its correct application.

Compliance with a PAS cannot confer immunity from legal obligations.

In particular, attention is drawn to the following specific regulation:

- Data Protection Act 1998 [1]

Introduction

The financial services sector faces a significant and growing problem with respect to unclaimed customers' assets and money. Estimates of unclaimed assets vary between £15 bn and £20 bn¹⁾ but are still thought to severely underestimate the true extent of the problem, possibly by a factor of three or more.

The primary cause of unclaimed or lost customer assets and/or money is out-of-date and/or incomplete customer information which prevents financial services providers maintaining contact with beneficial owners.

The ability of a financial services organization to manage its customers' assets therefore depends not only on the quality of its customer contact data but also on the data management policies it has in place to avoid disconnects between the organization and the customer which prevent assets being reunited or timely communication being issued.

The aim of this PAS is to enable organizations who administer their own customer data or third party administrators (TPA) who act for such organizations to put in place a governance process. It provides a framework for maintaining and continually improving the accuracy of the customer data they hold, including tracing details of lost customers or beneficiaries of the assets.

The regulations in the financial service industry, as defined by those including Financial Conduct Authority (FCA), Prudential Regulatory Authority (PRA), the Pensions Regulator (tPR) and HM Revenue & Customs (HMRC), require that customer data is appropriately maintained, any changes are made in a timely manner and reasonable steps are taken in order to achieve this. This applies to any financial services organization authorized and regulated in the UK.

This PAS specifies requirements that can help financial services organizations and TPAs, who administer for organizations, to demonstrate good practice in maintaining customer data. However, the PAS is not intended to provide legal advice or an interpretation of applicable regulations and users are responsible for their own compliance with such regulations.

1 Scope

This PAS specifies requirements for maintaining financial services customer data.

It is for use by financial services organizations that hold and maintain customer information, such as banks, building societies, pension providers, insurance companies and investment management companies. It is also for use by third party administrators (TPAs) who manage customer information on behalf of any of these organizations.

More specifically, it covers:

- a) the minimum requirements for achieving and maintaining customer contact;
- b) primary and, where present, secondary data to be captured and maintained by financial services organizations;
- c) establishing contact with lost customers and beneficiaries;
- d) business history profiling including high-level details of any organizational changes, such as mergers and acquisitions, which may have affected the way in which customers contact the financial services organization. In addition, how the organization communicates or makes this information available to its customers;

¹⁾ Timothy Edwards, Standard Note SN/BT/3027. *Unclaimed assets/dormant accounts*. London: House of Commons Library, 2011.

- e) timeframes for any review and, if required, updating of customer contact data; and
- f) the organization's data quality management (DQM) policy.

It does not cover:

- 1) initial data capture and its accuracy;
- 2) data and accuracy in respect of customers' financial assets;
- 3) technology used for data storage, data transformations and data transmissions;
- 4) data protection;
- 5) bankruptcy data;
- 6) anti-money laundering (AML) requirements;
- 7) bodies corporate; and
- 8) financial services organizations that are authorized and regulated outside the UK.

2 Terms, definitions and abbreviations

2.1 Terms and definitions

For the purposes of this PAS, the following terms and definitions apply.

2.1.1 address

full postal address

2.1.2 beneficial owner

actual owner of the assets

NOTE Beneficial owner is a legal term where specific property rights ("use and title") in equity belong to a person even though legal title of the property may belong to another person.

2.1.3 bodies corporate

groups of people, such as corporations, which are treated by law as if they were persons

2.1.4 business

overarching legal entity that comprises one or more organizations as well as other areas that do not process and hold information

NOTE A corporate group or holding company may include several semi-autonomous organizations (see definition) which may share a common marketing brand.

2.1.5 closed customer contact

contact received by an organization from their customer either directly or via their representative

NOTE Any correspondence issued where a response is not required or received is not considered to be closed customer contact.

2.1.6 contract

agreement entered into voluntarily by, or for the benefit of, a customer with an organization for the purchase of a financial services product

NOTE The terms of a contract are detailed in relevant documentation such as terms and conditions and policy documents.

2.1.7 customer

individual with whom the organization or their representative has a relationship or holds assets pending settlement of proceeds

- 2.1.8 customer data**
personal information about a customer which enables the organization to uniquely identify and communicate with them
- 2.1.9 customer status**
customer's latest known status, whether living or dead, address known or not known and verified or not verified
- 2.1.10 data quality management (DQM) policy**
statement of overall intentions and direction of the organization as formally approved by senior management for maintaining and improving the quality and accuracy of personal contact information and status of the customer
- 2.1.11 de minimis limit**
value, defined in the organization's DQM policy, below which a reduced level of tracing and/or verification is applicable
- 2.1.12 documented service levels**
record of expected timescales an organization adheres to when completing processes in order to provide services to customers
- 2.1.13 full name**
first name and surname plus any known middle names or initials of customer
- 2.1.14 holding value**
value of assets/benefit held by the organization on behalf of the customer
- 2.1.15 national identifier**
government-issued unique identification
NOTE For example, a national insurance number (NINo) for UK citizens, or a taxpayer identification number (TIN) for US citizens.
- 2.1.16 organization**
legal entity that processes and holds financial services customer information
NOTE Examples include natural persons, sole traders, companies, partnerships, bodies corporate, public sector bodies, voluntary associations, charities and third party administrators (TPAs).
[SOURCE: BS 10012:2009, 2.1.5]
- 2.1.17 personal contact information**
personal data relating to an identifiable living individual
NOTE The definition of "personal data" can be found in the Data Protection Act 1998 [1] section 1(1).
[SOURCE: BS 10012:2009, 2.1.6]
- 2.1.18 primary data**
data held and maintained by an organization to assist identification of a customer
NOTE Data considered primary is listed in 6.1.
- 2.1.19 procedure**
documented set of actions which is the official or accepted way of doing something
[SOURCE: BS 10012:2009, 2.1.9]
- 2.1.20 process**
series of actions taken in order to achieve a result
[SOURCE: BS 10012:2009, 2.1.10]

2.1.21 secondary data

data held and maintained, in addition to primary data, by an organization to assist identification of a customer

NOTE Data considered secondary is listed in 6.2.

2.1.22 tracing

process used to locate and identify customers or beneficiaries with whom the organization has lost contact

2.1.23 tracing agency

specialist organization that matches key data to a customer to confirm their status and address

2.1.24 validation

evidence that reconfirms the customer data held, either through a closed customer contact or other separate internal source of information

NOTE Examples of separate internal sources of information include information obtained from other parts of the business or quality checks.

2.1.25 verification

confirmation from an external source of information received

NOTE Examples of separate external sources of information include data sources such as credit data, disclosure of death registration information (DDRI) and the electoral roll.

2.2 Abbreviations

For the purposes of this PAS, the following abbreviations apply.

BT OSIS	British Telecom operator services information system
DDRI	disclosure of death registration information
DQM	data quality management
GRO	general register office
NCOA	national change of address file
NINo	national insurance number
POA	power of attorney
TIN	taxpayer identification number
TPA	third party administrator

3 Business profiling

NOTE Organizations go through a number of business and product changes during their lifetime. Each of these changes adds to the complexity of record-keeping and the ease with which customers contact, or can be contacted by, the organization. Typically, these major changes are handled through projects and the people involved in these projects move on to other things when they are complete. This means that the knowledge of both systems and processes does not remain within the organization over time.

Understanding this history, along with the age and demographic of the customer base, enables an organization to better understand the potential risk to the accuracy of its customer data and ensures the right type and level of tracing is adopted. It is crucial therefore, that this work is carried out when:

- *developing any customer management policy;*
- *developing internal processes;*
- *agreeing with any external party the best tracing methods.*

3.1 Business profiling exercise

3.1.1 General

The organization shall carry out an exercise to generate a complete record of customer data that was acquired from or transferred to other organizations. Once completed, this record shall be updated as and when any of these events occur in the future. The complete record shall include:

- a) the organization's business and fund acquisitions (see 3.1.2); and
- b) the organization's business and fund disposals (see 3.1.3).

NOTE 1 A "complete record" of events should take into account all events that have impacted the organization's existing customer base.

NOTE 2 The organization should capture details of any other activity, in addition to those set out in 3.1.1a) and 3.1.1b) that affect the assets or contract terms, and make this information available to their customers and staff for referral. Examples of other activities to be captured include fund mergers and closures.

3.1.2 Business and fund acquisitions

A complete record of the organization's business and fund acquisitions over the previous five years that could have affected any of the current customers shall be compiled and updated when further acquisitions occur. Information gathered shall include the date of the acquisitions and the details of the old and new organizations or funds.

NOTE Movements of assets, or whole books of business, generally change some or all parts of the process for making future contact with the organization. Whilst generally the process of moving the assets involves communicating with all customers, there can be instances in which it was not possible to make contact before the transfer took place. Once the acquisition has occurred it may be difficult for a customer to contact the organization that now owns the assets if they had lost contact with the previous organization.

3.1.3 Business and fund disposals

A complete record of the organization's business and fund disposals over the previous five years that could have affected any of the current customers shall be compiled and maintained. Information gathered shall include the date of the disposal and the details of the old and new organizations or funds.

NOTE For those customers who have been transferred elsewhere, the likelihood is they will contact the old service provider first if they are unaware of the transfer.

3.2 Third party administrators (TPAs)

Where the organization is a TPA, the organization shall demonstrate in its DQM policy how it will fulfil the activities set out in Clause 4 for the organizations it supports if business and fund acquisitions and disposals occur during the TPA's administration.

NOTE It is not necessary for a TPA to carry out the activities set out in Clause 4 for events that occurred prior to its administration.

4 Data quality management (DQM) policy

4.1 General

An organization shall produce and implement a DQM policy in order to govern the accuracy and currency of its customer data.

NOTE 1 The implementation of a DQM policy should improve customer service, reduce error rates and minimize opportunities for fraud.

NOTE 2 The organizations should draw up a process map of how customer data moves through their organization and/or any third party suppliers and document the governance structure for process change management.

4.2 DQM policy content

The DQM policy shall be reviewed at least on an annual basis and shall define:

- a) a de minimis limit, not greater than £25, that applies to each customer within the organization's business;

NOTE 1 Taking into account the nature of the financial services product, the organization may set a lower de minimis level appropriate to their business.

- b) the frequency within which validation of customer data, including any previously excluded customer data, is to be carried out and the circumstances when additional tracing is to be carried out. The frequency shall not be greater than every five years;

NOTE 2 Organizations should validate customer data annually in order to mitigate risk.

NOTE 3 If not already carried out in the previous 12 months, additional tracing should be carried out on accounts ahead of any imminent event which might impact the interests of the customer, for example a maturity date or where all customers in a particular fund are to be sent a legal mailing (e.g. to vote on changes to fund structure).

- c) the tracing activity to be carried out, including the level of verification (if any), to be initiated as specified within the organization's documented service level timescales, but not greater than ten business days of receipt of tracing results;

NOTE 4 Where a tracing agency has been involved, these actions should be broken down by each of the different result types, as defined in 7.3b) and 8.3c).

- d) documented reasons why a customer record is excluded from any validation. This is to be reviewed, as defined in 4.2b);

NOTE 5 For example:

- *historical records that only contain minimal information such as missing first names, no dates of birth, no historical address; or*
- *where an attempt has previously been made to trace the record on at least one occasion.*

- e) a deceased de minimis value, not greater than £500, above which additional tracing of next of kin and/or beneficiaries is carried out;

NOTE 6 Once a customer's deceased status has been confirmed, it is not economical to trace beneficiaries where the value falls below this threshold.

- f) what action (if any) is to be taken where the organization has been advised, by any means, that a customer is deceased but it has not been validated;

- g) what evidence the organization requires to recognize a confirmed deceased customer;

- h) what management information is to be collected, to whom in senior management it is accessible and how frequently it is to be produced. This shall be not greater than annually;

NOTE 7 The DQM policy should enable the organization to measure and monitor changes in the proportion of their data that falls into various categories relevant to their business (e.g. deceased, gone away, etc.).

- i) the timescales for capture, production and review that applies to all parts of the DQM policy;
- j) procedures and validations affecting customer data that apply to each type of application/contact route for all stages of the customer journey;

NOTE 8 Contact routes include online correspondence, paper correspondence and telephone calls.

NOTE 9 All members of staff should have access to regularly maintained procedure notes covering each of the application/contact routes offered to customers by the organization.

- k) the organization's procedure for carrying out its own external checking of customer data;

NOTE 10 Organizations may carry out external checking for verifying customer data via the following methods:

- *writing to the old address with a neutral letter for it to be forwarded to a new address;*
- *ringing the customer if a telephone number is held;*
- *using an email address where held; or*
- *any other methods available to the organization.*

- l) what validation of customer data held, against external data, is to be carried out and the timescales for it;

NOTE 11 This validation can be carried out using a tracing agency.

- m) a maintained audit trail which supports the business profile and how this is made available to both customers and staff for referral;

NOTE 12 The audit trail should include a record of any previous entities that have over time been absorbed into the organization (by takeover, name-change, amalgamation, etc.), which could have affected any of the current customers. This should enable staff to recognize enquiries relating to now obsolete provider names. Where relevant this should include details of account number correlation.

- n) the process for understanding the quality of customer data as a result of mergers, acquisitions or disposals and development of new systems and platforms;
- o) the correspondence types to be issued in the event that a lost customer has been traced and the timescales for their issue;

NOTE 13 For example:

- a) *high-risk items to be issued as soon as practicable;*
- b) *medium-risk items to be issued for information; and*
- c) *low-risk items can be issued at next statement date.*

- p) the organization's acceptable levels of customer data quality and the actions and timescales that apply in the event of failure to meet them;
- q) what steps are to be taken in the event that the assets and/or benefits remain unclaimed;

- r) the customers to be investigated whose ages fall outside of the organization's expected customer age range; and

NOTE 14 For example, checking all records where the customer appears to be over 100 may reveal customers who are in fact deceased but the organization has not been advised through other means.

- s) a process for identifying and reporting customer complaints in respect of this PAS.

5 Maintaining customer contact

NOTE 1 A customer's contact details are crucial to an organization being able to protect the assets held on their behalf. They form part of the information used to verify a customer's identity, when activity is sought on the account. There could also be legal reasons, such as correctly marking a record for bankruptcy, or recording a designated person, where the accuracy is paramount. The data is also used for communication purposes, in meeting regulatory obligations and when responding to customer requests.

NOTE 2 Holding valid addresses allows an organization to carry out suitable and timely mailings to customers. This allows the organization to keep the customer informed and allows the customer to respond to actions when product changes are proposed.

NOTE 3 No contact from a customer does not necessarily mean that the customer contact data held is correct. This PAS therefore requires a proactive approach to revalidate these records.

5.1 General

5.1.1 A review of each customer's data held shall be carried out as defined in the DQM policy [see 4.2b)]. There shall be evidence of the customer data having been validated or specifically excluded, as defined in the DQM policy, either through this review or audited customer contact.

5.1.2 Where a customer record has been excluded from this review, the reason for this exclusion shall be recorded in accordance with the DQM policy [see 4.2d)].

5.2 Communication with the customer

5.2.1 In their pre-sale literature, the organization shall set out the customer's responsibility to notify the organization of any changes to their contact data.

5.2.2 In contract documents, the organization shall set out the customer's responsibility to advise the organization of any change in their contact data.

5.2.3 If the customer's responsibility to notify the organization of any changes was not included in the terms and conditions when the original product was purchased, the organization shall incorporate it in the next iteration of the terms and conditions or other customer communication within 12 months.

5.2.4 Where the organization is a TPA, the organization shall not be responsible for conforming to 5.2.1, 5.2.2 and 5.2.3.

5.3 Checking procedures

5.3.1 The organization shall have a process for checking that a customer's current address is correctly held, whenever the customer contacts them by telephone.

5.3.2 The organization shall have a process for checking that a customer's current address is correctly held when any type of correspondence is received.

5.3.3 The organization shall have a process for validating any information gained from a returned piece of mail.

5.4 Reissue of correspondence

After validating a new address on a customer record previously marked as "address unknown" the organization shall have a process in place for reissuing any relevant correspondence the customer has not received.

5.5 Management information

5.5.1 The organization shall produce management information reports for senior management at a frequency defined in the DQM policy [see 4.2h)].

5.5.2 The management information reports shall contain information on:

- a) the number of records where evidence exists that the customer data has been validated;
- b) the level of lost customer addresses, as a percentage of the organization's total customer population;
- c) the level of new address records which have yet to be validated, as a percentage of the total population of address records;

NOTE 1 For example, where a revised address has been provided by an external source but not confirmed by the customer.

- d) the level of confirmed deceased customers, as defined in the DQM policy;
- e) the level of customers notified but not yet confirmed as deceased, as defined in the DQM policy;
- f) the number of customer records where notification of death has been received but not yet been confirmed;

NOTE 2 This information enables senior management to control the risk of incorrect records being updated or incorrect notifications received.

- g) the quality of the customer updates processed by staff, as defined in the DQM policy;

NOTE 3 Incorrect customer updates risk the organization acting incorrectly and breaching the Data Protection Act 1998 [1].

- h) the timeliness with which customer records are updated based on the date the updated customer information was received, as defined in the DQM policy;

NOTE 4 Delays in updating records increase the risk of fraud and that the organization might act incorrectly and breach the Data Protection Act 1998 [1].

- i) the percentage of customer records that are excluded from any five-year review;
- j) date and results of the last five-year review;
- k) confirmation of when the process for updating any customer data was last reviewed;
- l) actions and target dates that the organization's management are taking as a result of the report; and
- m) analysis of the ages of customers held, as defined in the DQM policy.

5.5.3 Senior management shall identify the actions to be taken in order to mitigate any risks highlighted by the information reported and the date by which any actions are to be completed. These shall then be kept on review by senior management until the actions are complete.

6 Data to be maintained

6.1 Primary data

The organization shall maintain and verify the following primary data, where it is held or is required for the product:

- a) full name;
- b) address, conforming to a relevant national standard;

NOTE 1 The relevant national standard for a UK address is described at: <http://www.royalmail.com/personal/help-and-support/How-do-I-address-my-mail-correctly> and the relevant national standard for any overseas address is referred to at: <http://www.bitboost.com/ref/international-address-formats.html#Formats>.

- c) gender;
- d) date of birth;
- e) national identifier;
- f) holding value;
- g) contract termination date; and

NOTE 2 This is the date when either the contract came to an end (e.g. maturity) or when any remaining assets were requested to be repaid by the customer.

- h) customer status.

NOTE 3 An organization should identify:

- whether the customer is living or dead and the date this status was notified or confirmed; and
- whether the address held is verified, last known or gone away.

6.2 Secondary data

If held, the organization shall maintain the following secondary data:

- a) marital status;
- b) title;
- c) phone numbers;
 - 1) home landline;
 - 2) work landline;
 - 3) mobile;
- d) email address;
- e) social media data;
- f) address history;
- g) middle names;
- h) role (grantee/POA, etc); and
- i) alternate contact details.

7 Tracing lost customers

7.1 General

Where an organization has evidence that their customer data is no longer accurate the organization shall carry out a tracing exercise in accordance with 7.2 and 7.3.

NOTE Failure to act on the information could lead to breaches of the Data Protection Act 1998 [1], as information could be sent to an incorrect address.

7.2 Minimum steps

The following steps shall apply, regardless of any de minimis value defined in the organization's DQM policy. Where a step does not result in a positive outcome the next step in the list shall be carried out.

- a) The information that highlighted that the currently held address is no longer accurate shall be assessed for authenticity in accordance with the procedure outlined in the organization's DQM policy. Once assessed, either further checks set out in 7.3 shall be carried out or the record shall be updated to reflect that the current address is not to be used. This shall take place within the documented service levels, but not greater than ten business days.

NOTE 1 Where there is information that the currently held address is no longer accurate, the organization should verify that information against any other accessible customer data held by other parts of the business and reviewed where this data differs.

- b) If there is no internal data that can help verify the customer's current address, the organization shall carry out its own external checks, as defined in the DQM policy.

NOTE 2 For example, this could include writing to the last-known address, ringing the last-known telephone number and contacting any known email addresses.

7.3 Further steps

The following further steps shall apply in cases where the holding value exceeds £25, or such lower de minimis limit specified in the DQM policy, and shall be completed within 12 months of the organization first discovering an event.

- a) Customer data held shall be verified against credit data, plus at least one of these other external data sets:

- 1) electoral register;
- 2) national change of address (NCOA);
- 3) BT OSIS.

NOTE 1 Marketing data is not an acceptable second data set as it cannot be relied upon.

NOTE 2 Additional external data sets may also be used to further enhance the verification process.

NOTE 3 A tracing agency can be used in order to carry out the verification set out in 7.3.

- b) Where a tracing agency has been involved in 7.3a), an organization shall act in accordance with its DQM policy based on the confidence levels provided by the tracing agency.

NOTE 4 Results from tracing agencies typically fall into the following four confidence levels:

- a) *high confidence in the results and, if the organization supports the action, the customer record can be updated directly from this information;*
- b) *confidence in the results but further validation should be sought before the record is updated;*
- c) *some evidence to support the revised information but not with high confidence, which can lead to further evidence being sought or agreeing on further action to be taken based on the organization's internal procedures; or*
- d) *no evidence that supports the change of the current data.*

7.4 Evidence

The organization shall record the date and results of any tracing activity carried out in 7.1, 7.2, and 7.3 either internally or through a tracing agency, whether successful or not.

8 Tracing executors and/or beneficiaries

8.1 General

Where an organization has evidence that a customer is deceased and there are no documents, such as a death certificate or probate, the organization shall carry out a tracing exercise to establish the customer status and, depending on the value of the asset when compared to the de minimis limit, obtain where possible the executors and/or all the beneficiaries, in accordance with 8.2 and 8.3.

NOTE Failure to act on the information could lead to breaches of the Data Protection Act 1998 [1], as information could be sent to an incorrect address.

8.2 Minimum steps

The following steps shall apply in all cases, regardless of any de minimis value defined in the organization's DQM policy. Where the step does not result in a positive outcome the next step in the list shall be carried out.

- a) The information that highlighted that the customer is deceased shall be assessed for authenticity in accordance with the procedure outlined in the organization's DQM policy. Once assessed, either further checks shall be carried out or the record shall be updated to reflect the current status of the customer. This shall take place within the documented service levels, but not greater than ten business days.
- b) The information that highlighted that the customer is deceased shall be verified against any other accessible customer data held by other parts of the business, and reviewed where this data differs.
- c) If there is no internal data that can help verify the customer status, an organization shall carry out its own external checks, as defined in the DQM policy.

NOTE A positive outcome at any step might be that the customer is confirmed to be alive.

8.3 Further steps

The following further steps shall apply in cases where the holding value exceeds £25, or such lower de minimis limit specified in the DQM policy, and shall be completed within 12 months of the organization first discovering an event.

- a) Customer data held shall be verified against the disclosure of death registration information (DDRI) scheme.

NOTE 1 Verification against the DDRI can only be undertaken by a licensed organization; this may be the organization or a tracing agency complying with this PAS.

- b) In cases where the holding value exceeds £500, or such lower de minimis limit specified in the DQM policy, details of executors and/or beneficiaries shall be sought.
- c) Where a tracing agency has been involved in 8.3a) and 8.3b), an organization shall act in accordance with its DQM policy based on the confidence levels provided by the tracing agency.

NOTE 2 Results from tracing agencies typically fall in to the following four confidence levels:

- a) *high confidence in the results and, if the organization supports the action, the customer record can be updated directly from this information;*
- b) *confidence in the results but further validation should be sought before the record is updated;*
- c) *some evidence to support the revised information but not with high confidence which can lead to further evidence being sought or agreeing on further action to be taken based on the organization's internal procedures; or*
- d) *no evidence that supports the change of the current data.*

8.4 Evidence

8.4.1 For confirmation of death, where a death certificate or probate is not already held, the organization shall record the DDRI reference (or an overseas equivalent) along with confirmation of the date of death. In the event that the death was registered before 2008, the organization shall record the general register office (GRO) reference instead of the DDRI.

NOTE Deaths registered before 2008 should come with a GRO reference which only supplies the month within which the death occurred.

8.4.2 The organization shall record the date and results of any tracing activity carried out in 8.1, 8.2 and 8.3, whether successful or not.

9 Timeframes for action

9.1 Frequency of review

The organization shall carry out a documented review of their customer status and address details at a frequency defined in the organization's DQM policy. This shall not be less frequent than every five years.

NOTE A tracing agency can be used to carry out this review.

9.2 Timeliness

The results of any activity which require a customer's record to be updated shall be completed in accordance with any documented service level timescales, but shall be no greater than ten business days.

Bibliography

Standards publications

For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

BS 10012:2009, *Data protection – Specification for a personal information management system*

BS EN ISO 9000 (series), *Quality management system*

Other publications

[1] GREAT BRITAIN. Data Protection Act 1998. London: The Stationery Office.

Further reading

BS ISO 30301, *Information and documentation – Management systems for records – Requirements*

BS ISO/IEC 27001, *Information technology – Security techniques – Information security management systems – Requirements*

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