

Brackenridge Hanson Tate Client Money Handling Procedure

The key aim is to ensure that client money is held in accordance with Rule 8 of the RICS Rules of conduct as follows:

Clients' money

8. A Firm shall preserve the security of clients money entrusted to its care in the course of its practice or business

As a member of the RICS Client Money Protection Scheme we adhere to the RICS Rules of Conduct for firms and the RICS Client Money Protection Scheme, and any other regulations with regards to the handling of client money as follows:

- 1) All client money is held in a client money bank account with a bank, which is authorised by the Prudential Regulatory Authority, the Bank of England and the Financial Authority Conduct.
- 2) As a Scheme Member:
 - (a) We hold clients' money in one or more client bank accounts into which all clients' money is paid. Client money is available on demand.
 - (b) The bank account is titled to include the name of the firm and word 'client' and discrete client money accounts include an identifier (e.g. the client or property name) in the title of the account.
 - (c) We do not hold office money in a client account unless it is a receipt of mixed monies where the office money is awaiting transfer.
 - (d) With effect from 1 April 2019, we advise clients that client money will be held in a client money account and notify clients of the details of that account and agree the terms of the account handling, including arrangement for interest and charges.
 - (e) We confirm in writing with the bank which holds a client money bank account that the bank acknowledges that monies in the client money bank account must not be combined with, or transferred to, any other account maintained by the firm, and the bank shall not be entitled to exercise any right of set up or counterclaim against money in that client money bank account in respect of any sum owed to it in respect of any other account of the member firm.
 - (f) We keep records and account using our software package Qube, which show all dealings with client money, and demonstrate that all client money held by the firm is held in a client money bank account.
 - (g) We complete a monthly 'three-way' client bank account reconciliation of the main client account which is reviewed by a principal of the firm.

Controls over the receipt of client money

Brackenridge Hanson Tate ensures that:

- All client money received is paid into a client money account promptly
- When mixed money is received the receipt is paid into the client money account and the office money is transferred into the office account promptly

- Where client instructions are to hold only part of a payment the whole payment is placed into the client money account before transferring the relevant part promptly
- Interest or other benefits accruing from client money to the client are accounted for, unless otherwise agreed with the client in writing
- Prompt action is taken to identify the owner of any unidentified client money received- if the rightful owner cannot be traced and all avenues of investigation have been exhausted, the Brackenridge Hanson Tate policy is that the monies are paid from a client money account to a registered charity within two years of receipt and a receipt obtained

Controls over the payment of client money

Brackenridge Hanson Tate ensures that:

- Each client's money is used only for that client's matters
- That sufficient funds are held for the relevant client before making any payments on their behalf
- All payments from client money accounts are made to or on behalf of a client as agreed in the management agreement or on the client's written instructions
- Fees are taken as agreed in the management agreement
- Client money is returned to the client immediately as soon as there is no longer any reason to retain those funds, and any further payments received are paid to the client immediately
- Adequate authorisation and supervision procedures are in place for payments made by bank transfer and cheque
- All payments made have supporting evidence and that documentation has been authorized in advance by a Principle or other appropriate person
- Effective controls are in place for setting up new supplier accounts on the system

General Controls

Brackenridge Hanson Tate ensures that:

- Employees have clear segregation of duties and responsibilities and that a principal or an appropriate individual oversees the client accounting function
- It employs competent staff who are responsible for processing clients' money and who are familiar with all RICS rules
- Accounting systems and client data are securely controlled and protected
- Computer systems are adequately protected for access, firewalls, back-ups and disaster recovery
- There is adequate cover for holiday and long-term absence
- Principals cannot and do not override controls surrounding the accounting system
- Ensure that overdrawn balances are prevented by the firm's systems and controls and if these do occur investigate and rectify them immediately