Client Money Handling Procedures

Client bank accounts

**We ensure:**

* that our clients’ money is held in a client bank account separate from all other monies and that client money is available on demand.
* any client bank accounts are correctly titled to distinguish the accounts from an office or any other account.
* we have obtained written confirmation from the bank of the client account conditions.

Client accounting systems and controls

**We ensure that:**

* accounting records and systems are appropriate to the nature and volumes of client account transactions.  We use a suitable software package to manage client money effectively.
* our systems provide details of all money received into and paid from all client accounts and show a running balance of all client money held in that account.
* our systems identify all receipts and payments to the client to which they relate; for example by means of client ledgers showing cash balances held on behalf of clients at all times.
* accounting records are completed chronologically and promptly.
* the current balances at the total and client levels are always available.
* all ledgers have the client name and an appropriate description
* overdrawn balances on client ledgers are prevented by the systems or controls in place and where they do occur are investigated and rectified immediately.
* adequate controls are in place over unidentified client money to ensure that such funds are kept securely.  The clients are located and reimbursed as soon as possible.  Such funds held for more than six years are donated to a registered charity.
* reconciliations are reviewed and signed off by a Principal or an appropriate independent senior member of staff.
* client accounting records, including copies of reconciliations, are securely kept for at least six years plus the current year.

Controls over the receipt of client money

**We ensure that:**

* No cash or cheque is accepted as form of payment. Only electronic payment (card or bank transfer) is possible.
* a reconciliation is performed between money received and that day’s banking.
* procedures exist to identify and distinguish between clients’ and office money.

Controls over the payment of client money

**We ensure that:**

* checks are made to ensure that sufficient funds are held on behalf of the relevant client before payments are made.
* a copy of the bank mandate is held and is up to date.
* adequate authorisation and supervision procedures are in place for payments made by bank transfer and other electronic methods.
* insurance and adequate Principal supervision is in place where payments are made by non-principals.
* all payment requests have supporting evidence and that documentation has been authorised in advance by a Principal or other appropriate person.
* blank cheques are not signed, and unused cheques are kept securely.
* effective controls are in place over the setting up of new supplier accounts on the system.
* cash payments are not permitted.