

## E. Handling of Client Money

Members of the Scheme must train all staff in these rules:

1. Have separate client bank accounts solely for the use of all client money;
2. Only hold client monies in UK banking institutions authorised by the Financial Conduct Authority and that are covered by the Financial Services Compensation Scheme and ensure that funds are available within a maximum of 31 days.
3. Have the title of their client money bank account easily distinguished from other accounts of their firm with the words 'Client Account' clearly stated;
4. Have written confirmation from their bank(s) that all client money is held by your firm as an agent and that the bank is not entitled to combine the client money account(s) with any other account or to exercise any right of set-off or counterclaim against money in that account in respect of any sum owed to it on any other account by the firm;
5. Have and maintain relevant systems and controls which enable you to monitor and manage client money transactions and any credit risk arising, including but not limited to regular internal account audits;
6. Have accounting systems and client data securely controlled and protected;
7. Obtain clients' written approval to make payments from their accounts;
8. Pay all client monies into the firms designated client money bank account within three (3) business days of the money being received into the firm;
9. Nominate authorised staff to handle client money;
10. Ensure records show all dealings with client money;
11. Ensure that all procedures for handling client money are complied with and clearly written down and provided free of charge to your clients, preferably in your terms of business or management agreement;
12. Reconcile client accounts together with bank and cash balances at regular intervals in order to demonstrate control over the accuracy and completeness of accounting records;
13. Ensure there are sufficient funds in the client account to pay amounts owing to clients as they fall due under the Members' terms and conditions of engagement with the client;
14. Repay any client money, including where feasible any interest earned, without delay if there is no longer any requirement to retain that money or the client requests it.