## **Client Money Handling Procedure**

As a member of UKALA and in accordance with UKALA Client Money Protection criteria, we adhere to the Rules of Conduct and any other regulations as necessary by using the following procedures:

- We ensure that Clients' Money bank account is easily distinguished from other accounts;
- If requested, we can obtain in writing from our bank confirmation that all Client Money is held by the Business as an agent;
- We have written confirmation that the bank is not entitled to combine or transfer Client Money account(s) with any other account maintained by the business or to exercise any right of set-off or counterclaim against the money in that account in respect of any sum owed to it on any other account of the Business;
- We have systems and controls in place which enable us to monitor and manage Clients'
  Money transactions and any risk arising;
- We have accounting systems and client data securely controlled and protected;
- We bank all Clients' Money at the earliest reasonable opportunity;
- We repay any Client Money without delay if there is no longer any requirement to retain that money or the relevant client requests it; and
- We keep records and accounts which show all dealings with Client Money and demonstrate that all Client Money held by the business is held in a Client Money Account;
- We 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;
- We ensure there are always sufficient funds in the account to pay all amounts owing to clients; and
- We pay amounts owing to clients as they fall due without delay.