



# CSquared

Client Money Handling Procedure

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## Client Money Handling Procedures

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At CSquared we take our responsibilities for managing our clients' money very seriously and want to give our clients assurance that their funds are protected and safe.

This document outlines the key principles and procedures we have to handle client money.

### Overview

We have designed our procedures and processes for managing client money in line with the RICS professional statement "Client Money Handling" 1st edition October 2019.

CSquared Real Estate LLP or CSquared (RICS Registered Firm No 047742.) is a member of the RICS Client Money Protection Scheme.

We consider the following to be the core objectives of our approach to handling client money:

- To safeguard the funds entrusted to us by our clients
- To maintain accurate accounting records in respect of our clients' money
- To provide clarity and transparency of the approach we adopt to our clients

### Definition of Client Money

We consider client money to encapsulate the following:

- Any currency (whether cash, cheque, draft or electronic transfer) that we hold or receive on behalf of our clients as part of the delivery of our services.
- Excluding amounts which are immediately due and payable on demand.

### How and Where Client Money is Held

In relation to client money we hold or receive, the following conditions apply:

- All client money is held in designated client money accounts. These are **Discrete Accounts** that are client specific accounts (i.e. they are unique to individual clients) and are used to hold client money relating to the relevant client.
- All bank accounts utilised by CSquared for client money are exclusively controlled by CSquared, except where the client requests that money is held in an account to which it also has access. In such cases, these accounts are established by the relevant client.
- All bank accounts utilised by CSquared for client money are provided by an appropriate banking institution authorised by the Prudential Regulatory Authority (PRA) or the Financial Conduct Authority (FCA).<sup>1</sup>
- All client money accounts are solely utilised for client money and do not include office money (i.e. funds relating solely to CSquared's own business).
- All discrete accounts include the word client and the name of the client in the title of the account.
- All client money held is available on demand.
- We obtain written confirmation from the bank of the operating conditions for all client money accounts.

### Access to Funds

Access to client money accounts is restricted to specific individuals, who possess an appropriate level of experience and seniority (namely a Partner or Management Grade).

All payments out of client money accounts require approval by at least one named individual on the bank mandate.

Access to the e-banking systems is limited to selected Partners of the business, as well as Manager Grade members of the Property Management accounting team.

All bank mandates are reviewed on at least an annual basis and approved by a Partner.

## **Timescales for Payment into Client Accounts**

Electronic transfers of client money are made directly into the relevant discrete accounts. Receipts are reviewed on a daily basis.

Where money is received by cheque, these are banked on at least a weekly basis.

Cash payments directly into client accounts are not accepted.

Unallocated cash is reviewed regularly by the Property Management accounting team, with items remaining unallocated for 28 days returned to the sender. Any unallocated cash returned through this process requires approval from at least one individual on the relevant bank mandate.

## **Payment Authorisation**

As noted above, access to the bank accounts are limited to appropriate and authorised individuals.

All payments made from client money are made to or on behalf of the relevant client, in line with the agreed service delivery (e.g. as documented in a Property Management Agreement (PMA)). Payments for management fees are made in line with agreements for each individual client.

Payments are made via electronic transfer (e.g. FPS, BACS or CHAPS) wherever possible, but in all cases of payment, the payment requests must be supported by appropriate evidence (such as the original invoice) and approved by the relevant individuals. Additional controls are in place to restrict other methods of access to funds (e.g. restrictions on withdrawals).

No payments are made unless there are sufficient funds held to cover the payment.

## **Interest and Bank Charges**

The bank accounts used to hold client money are interest bearing accounts, for which CSquared cover all bank charges (including transaction fees and account maintenance charges). CSquared is also entitled to retain any or all interest earned through the aggregation of client money within the discrete accounts to offset general bank charges and administration costs associated with operating the relevant bank accounts (in line with specific client agreements, such as the PMA). The Discrete accounts are credited with interest at the agreed rate and interval.

## **Bank Account Reconciliations**

Records are maintained for all discrete accounts maintained by CSquared, including an audit trail of transactions for each account.

All discrete accounts are reconciled on at least a monthly basis between the cash book, bank statements and general ledger by a member of the Property Management accounting team, with an independent review undertaken for each reconciliation.

Reconciling items identified are investigated to identify actions required to resolve them, where necessary. Levels of reconciling items are monitored and reviewed monthly.

## **Information Provided to Clients about Client Money**

We advise all clients in writing of the bank account details relevant to them (account name and details of the bank) and agree the terms of the account handling, including arrangements for interest and charges.

Reporting arrangements are agreed individually with each client to meet their needs, but typically include regular financial reporting and details of the client money held by CSquared on their behalf.

Where we receive surplus client money, such money is held within a designated unclaimed client funds account (distinct from other client money accounts) and efforts are made to identify the owner and return the funds.



Where this is not possible, the funds are transferred to a registered charity in line with the RICS rules. The unclaimed client funds account is reviewed on at least an annual basis to determine whether any transfers or other action is required.

In the event that any client money is misappropriated, we take prompt action to inform RICS, the client affected and our insurers. Any such event is suitably investigated with remedial action taken where required.

### **Disputes or Complaints**

Whilst we endeavour to avoid disputes wherever possible, we recognise that occasionally when dealing with our clients, we may do or omit to do something that gives rise to dissatisfaction, disappointment or a complaint. In such circumstances, we want to put things right and improve our service.

Typically, such instances are addressed via day-to-day contract management or client interactions. However, specific arrangements for individual clients are agreed as part of our client agreements (e.g. defined within the PMA).

In addition to the above, CSquared has a defined Complaint Handling Procedure (in line with the RICS Rules of Conduct) to respond to and address written complaints.