

Client Money Handling Procedure

Overview

We are committed to safeguarding client money in accordance with the latest UK regulatory requirements, including the rules set out by the Financial Conduct Authority (FCA) where applicable. This procedure outlines how we receive, hold, manage, and return client funds to ensure full transparency, protection, and compliance.

What is Client Money?

Client money is any money we receive or hold on behalf of a client in connection with our services. This does not include money that is immediately due and payable to us for services already provided, unless otherwise required by regulation.

Segregation of Client Money

All client money is held separately from our own business funds in designated client bank accounts. These accounts are clearly identified as client accounts and are used solely for holding client funds.

We ensure that:

- Client funds are never mixed with operational or business funds.
- Accounts are held with reputable UK-regulated banks.
- Appropriate internal controls are in place to prevent misuse.

Receipt of Funds

When we receive client money:

- Funds are recorded promptly and accurately in our accounting system.
- Deposits are allocated to the correct client account without delay.
- Any discrepancies are investigated immediately.

Holding and Safeguarding Funds

While holding client money, we:

- Maintain accurate, up-to-date records of all transactions.
- Perform regular reconciliations between bank balances and client records.
- Restrict access to client funds to authorised personnel only.
- Monitor accounts for unusual or suspicious activity.

Use of Client Money

Client money is only used for the purpose for which it is intended, including:

- Payments to third parties on behalf of the client
- Settlement of agreed fees (only where contractually permitted)

We do not use client money for operational expenses or for any purpose not authorised by the client.

Withdrawals and Payments

All payments from client accounts:

- Require appropriate authorisation in line with internal controls
- Are supported by proper documentation
- Are processed promptly and securely

Reconciliation and Monitoring

We carry out regular reconciliations (at least monthly, or more frequently where required) to ensure:

- The total funds held match client balances
- Any discrepancies are identified and resolved immediately

Interest on Client Money

Unless otherwise agreed in writing, any interest earned on client money held in our accounts will not be paid to clients.

Returning Client Money

Client funds are returned promptly when:

- The service is completed
- The client requests repayment
- There is no longer a valid reason to hold the funds

All returns are made to the original source where possible, in line with anti-money laundering requirements.

Insolvency Protection

In the unlikely event of insolvency, client money held in segregated accounts is protected from claims by our creditors, subject to applicable law.

Complaints

If you have any concerns regarding how your money is handled, please contact us using the details below. Complaints will be handled in accordance with our complaints procedure and regulatory requirements.

Review of This Policy

This Client Money Handling Procedure is reviewed regularly to ensure compliance with current UK laws and regulatory standards. Updates will be published on our website as required.

Contact

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If you require further information regarding our client money procedures, please contact us directly using the details provided above.