

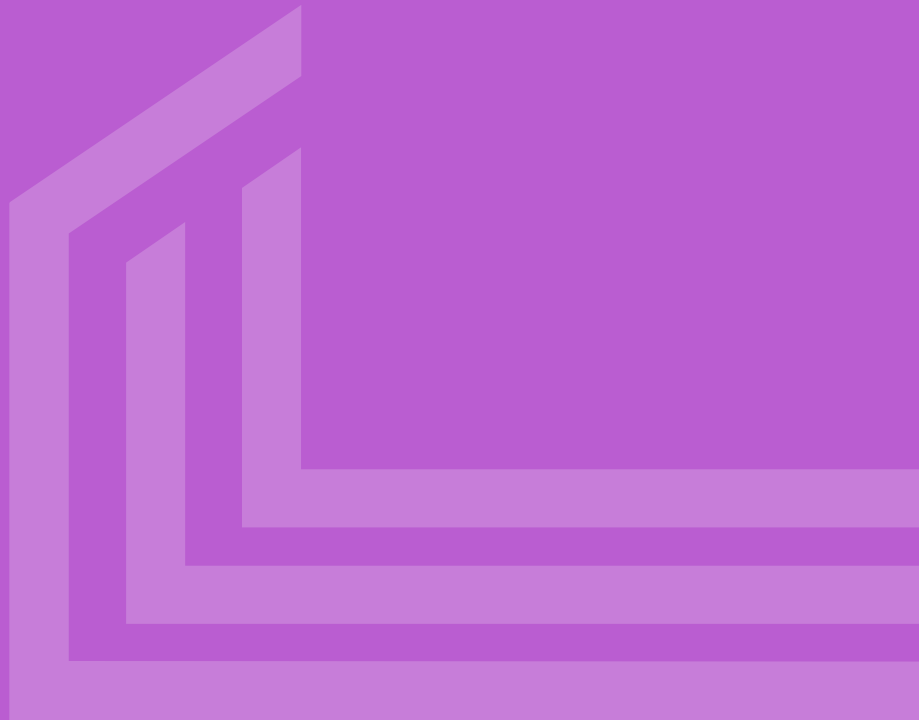


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TOTAL
Property

Our conflict of interest policy



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Property Redress

Property Redress is an impartial and independent complaint handling service. This policy has been written in the interests of openness and transparency to explain how seriously we take our responsibilities, and deal with any potential conflict of interest within the scheme and or with our staff.

Property Redress staff in restricted posts

These people are all required to tell their line manager of any private or personal interest which may affect their ability to deal with a particular complaint or to do their job.

Directors	Case assessors
Head of Redress	Case officers (adjudicators)
Resolution Leads	Any other case staff

The Head of Redress must:

- be appointed in a permanent position but remain accountable to the Property Redress board and act in line with the Property Redress authorisations
- not be appointed by those who are subject to investigation by him
- not be removed from his duties without a full explanation and justification
- not have occupied a position in the relevant industry, paid or otherwise, which may lead to doubt about his independence from the industry and his ability to make impartial decisions, in the three years before taking up his present position
- have the power (such power may be delegated) to decide whether Property Redress has the authority to deal with a complaint or not
- be required to report to the Property Redress Advisory Panel, being a body that is independent to the running of the Property Redress but provides both advice to and scrutiny of Property Redress

Restrictions on all Property Redress staff

Examples which would result in a restriction on a member of staff being involved in a complaint:

- complaints against a member:
 - who they have either been a member or were employed by, in the last five years

- where they have had any commercial dealings in the last three years
 - who are based in an area where they live, and may be impacted by the outcome of the complaint
 - where it is reasonable to think they may have a personal interest that could influence the handling of a complaint, for example, friends, family relationship or other personal involvement with members or officers of the scheme
- complaints made by relatives, friends or associates

Property Redress staff on the restricted list should not handle any part of any complaint, in which they have a personal interest, unless expressly authorised to do so by the Head of Redress or a member of senior management.

Where the restricted member of staff is the Head of Redress then the complaint will either be dealt with by a Director or Property Redress may decide that due to the conflict of interest it is not in the best position to resolve the matter and advise on a different course of action.

Working for other organisations

Property Redress expects those in restricted posts to work full time for Property Redress. However, this does not prevent staff members taking on work, either paid or voluntary, which is outside their duties with Property Redress, provided that the outside work does not harm or conflict with the work of Property Redress.

In this situation the staff member's line manager, or a member of the senior management, must be told in confidence, and before making any commitment to that additional work (including public service, such as a JP or a school governor). Property Redress reserves the right to instruct any member of staff not to take on any work which it considers harmful to its interests.

'Harmful' in this context includes outside work which could:

- give rise to a conflict of interest in the investigation of a complaint
- in any way jeopardise public confidence in the independence and impartiality of Property Redress or the Head of Redress
- in Property Redress' view, have a negative impact on the individual's ability to perform their job effectively

Personal relationships

Where a member of staff works with colleagues to whom they are related or are involved in a personal relationship, and a potential conflict of interest arises, the staff member has a duty to advise their line manager of this. The line manager will carry out a risk assessment and action will be taken to remove or minimise any risks.

Staff members are free to engage in political activity outside work, provided that this activity is only carried out outside working hours and as long as the activity does not:

- interfere in any way with their work for Property Redress, and
- jeopardise public confidence in the independence and impartiality of the Head of Redress or Property Redress

Our independence

Our staff only work within the division of HFIS Ltd that they are employed by.

We understand the importance of independence from our other MHCLG authorised schemes and no data is shared with other areas of our business without explicit agreement from the member.

We are ISO27001 (data security) accredited and manage conflicts through our conflict of interest policy and conflict of interest register. These policies are regularly reviewed and strengthened where appropriate.

Signed by:

Eddie Hooker

Eddie Hooker, Director, HF Resolution

Tim Frome

Tim Frome, Director, HF Resolution

Sean Hooker

Sean Hooker, Head of Redress

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Ministry of Housing,
Communities &
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