**EXAMPLE OF A BARRIER POLICY**

**(Each Company will establish their own Barrier Policy)**

**INFORMATION BARRIER - ARRANGEMENTS TO MANAGE POTENTIAL CONFLICTS OF INTEREST**

1. **BACKGROUND**

**Introduction varies with client**

THE COMPANY is in discussions with (client) which may lead to an instruction to (buy/sell/advise…) (client name). Potential conflicts of interest situations may arise to the extent that:

* THE COMPANY also represents/may represent (…another client/same property)
* THE COMPANY is already representing this client (buying/selling) and is now undertaking further services (planning, valuation …)

(spell out the conflict)

THE COMPANY’s Code of Business Ethics, the RICS Code of Conduct and the IPF Protocol for Managing Conflicts of Interest all include requirements regarding conflicts of interest and client confidentiality.

The arrangements set out below comply with these requirements and are designed to ensure that …(client name) ‘s…… interests are suitably protected through the proper control of confidential information and appropriate segregation of duties.

1. **CLIENT CONFIDENTIALITY**
	1. **Personnel**

A, B and C (names of team members) will make up the (Team). These people, and no other COMPANY staff, will have access to confidential information and the information will be controlled and protected as detailed in 2.2 – 2.4 below.

Each member of the Team will receive a copy of this information barrier and will be required to confirm, in writing, they have read, understood and will comply with its requirements.

A record of the Team members and their confirmations in respect of this information barrier is set out at Appendix 1.

* 1. **Telephone calls/meetings**

All discussions of a confidential nature will be conducted in private using a meeting room or other private area. Only Team members will participate in such discussions for THE COMPANY.

* 1. **Paper records**

All confidential paper records will be held in a separate and secure filing system when not in use. A clear desk policy will operate at all times such that confidential documents will not be left unattended either during the day or overnight.

When disposing of confidential papers, confidential waste bins will always be used.

* 1. **Electronic records**

All confidential electronic records will be held in a secure password protected area of the company’s computer system. Passwords will only be issued to Team members and usual THE COMPANY password security arrangements will apply.

During times when desks are unattended the user will either log out of the password protected area or lock their PC.

1. **MONITORING ARRANGEMENTS**

The Compliance Officer will ensure that the arrangements detailed above are put in place and operated in an effective manner.

The activities undertaken by the Compliance Department will include, but not be limited, to:

* Approving all potential Team members, the approval process will include ensuring that the potential member receives, reads and understands this paper and signs to acknowledge this.
* Making an initial assessment to confirm that arrangements have been put in place to meet the requirements set out in this paper.
* Making periodic unannounced checks to ensure that the arrangements are being operated effectively.
* Reporting to clients and THE COMPANY Executive as required.

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## APPENDIX 1

Client details

Property details

I confirm that I have received a copy of this paper and that I have read, understood and will comply in full with the requirements set out therein.

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