

# Our conflict of interest policy



## Our responsibilities

We take our responsibilities seriously and are committed to providing an impartial and independent complaint handling service. While potential conflicts of interest are always there, how we manage them is what's important. This policy:

- explains the arrangements we put in place to prevent conflicts adversely affecting our investigation of complaints
- makes sure our service is consistent and fair

All our people receive training to understand and recognise a potential conflict and are annually required to complete a personal conflicts declaration. Where a potential conflict is brought to our attention and, where necessary, we take the appropriate action to manage the conflict.

## What is a conflict of interest?

A conflict of interest can happen when an individual's personal circumstances compromise their judgment, decisions or actions at work. Our authority to operate the redress scheme and common law require us to put the interests of our customers first. Not doing so will mean we are not acting in their best interests.

## Our people

- Head of Redress
- Directors
- Department leads
- Case assessors
- Case officers (adjudicators)
- Resolution support staff
- Compliance officers

Everyone involved in handling our complaints must:

- tell their line manager of any private or personal interest affecting their ability to deal with a particular complaint or to do their job
- exclude themselves from any part of a complaint in which they have a personal interest, unless expressly authorised by the Head of Redress or a Department Lead

If the conflict involves the Head of Redress:

- the complaint will be dealt with by a director or a different member of the PRS leadership team, or
- we may decide that we are not in the best position to resolve the complaint, due to the conflict of interest, and offer advice on alternative options

### Examples

These are some of the situations that may restrict our people being involved in a complaint:

- they may be considered to have a personal interest that could influence complaint handling (such as complaints made by relatives, friends or associates)
- they were involved in running, or were employed by, the member business in the last five years
- they had any commercial dealings with the member business in the last three years
- they may be impacted by our decision due to living in the same area as the member business

### Working for other organisations

We understand the importance of independence from our other government authorised schemes and our people only work within the HFIS Ltd division that employs them.

Our people can take on work outside the PRS, either paid or voluntary, provided there is no conflict of interest and it is declared and agreed as part of their employment contract. This may include political activity provided this is only done outside working hours.

Our people must tell their line manager of any situation that may lead to conflict, before committing to any additional work (including public service such as a JP or a school governor).

Some of the situations where we may refuse permission for other activities are where it may:

- jeopardise public confidence in our independence and impartiality
- have a negative impact on the individual's ability to effectively perform their job

### Personal relationships

If our people are related or are involved in a personal relationship, they must advise their line manager if a potential conflict of interest arises. The line manager will carry out a risk assessment and action will be taken to remove or minimise any risks.

For more information on what we do, and how it works, visit our website [www.theprs.co.uk](http://www.theprs.co.uk)

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Scheme Authorised by:



Department for Levelling Up,  
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**NATIONAL TRADING STANDARDS**  
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