


## Resident's personal property, finances & possessions Policy

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### Mission Statement

Utilising our resources and skills to provide intentional supports for the people we support; enabling them to live full and inclusive lives by contributing to and enriching the fabric of their local communities.

SPC partners with external agencies and community services to facilitate '*ordinary lives in ordinary places*'

### Vision Statement

People supported will live a good life, in their own home, with supports and opportunities to become active, valued and inclusive members of their local communities.

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## **1. Policy Statement**

In line with SPC Mission and Vision, this policy contains procedures in respect of Person supported finances and private property. These procedures and policies apply to all aspects of the service and designated centres within St Patrick's Centre (Kilkenny) (SPC).

## **2. Policy Scope**

- 2.1 This policy applies to all employees in SPC and any other persons required to support people living in SPC regarding their personal belongings, property or finances.
- 2.2 The policy provides guidance for employees in relation to supporting people in managing their money.

## **3. Policy Purpose and legal background**

- 3.1 As per Health Act 2007 (Care and support of residents in designated centres for persons with disabilities) Regulation 2013, Schedule 5 outlines that every designated centre needs to maintain a policy in respect to "Residents personal property, personal finances and possessions".

Regulation 12 - Personal Possessions, outlines as follows:-

- (1) The person in charge shall ensure that, as far as reasonably practicable, each resident has access to and retains control of personal property and possessions and, where necessary, support is provided to manage their financial affairs.
- (2) The person in charge shall ensure that, as far as reasonably practicable, residents can bring their own furniture and furnishings into the rooms they occupy.
- (3) The person in charge shall ensure that—
  - (a) each resident uses and retains control over his or her clothes;
  - (b) each resident is supported to manage his or her laundry in accordance with his or her needs and wishes;
  - (c) where necessary, each resident's linen and clothes are laundered regularly and returned to that resident; and
  - (d) each resident has adequate space to store and maintain his or her clothes and personal property and possessions.
- (4) The registered provider shall ensure that he or she, or any staff member, shall not pay money belonging to any resident into an account held in a financial institution unless—
  - (a) the consent of the person has been obtained; and
  - (b) the account is in the name of the resident to which the money belongs; and
  - (c) the account is not used by the registered provider in connection with the carrying on or management of the designated centre.

- 3.2. The purpose of this SPC policy is to set out the procedures to be followed by SPC employees regarding the supports of person supported private property, belongings and finances.

- 3.3. The SPC policy outlines the steps and processes that shall be taken to ensure the interests of the person supported are protected and to give clear guidance to employees in the management of person supported' property in line with SPC Personal Plan Framework.
- 3.4. This document provides clear guidelines on the use of funds for the benefit of person supported, particularly where a person supported may not have full capacity to manage or make decisions regarding their funds without support.
- 3.5. The Personal Plan Framework determines the support a person needs to manage their money and outlines their financial planning in line with their roles and goals to life a good life, guided by SPC Theory of Practice "Social Role Valorisation".
- 3.6. Where a person supported is a Ward of Court or has in place an Enduring Power of Attorney (EPA) then the power to make any decisions in relation to funds held for safekeeping rests with the wards of court office or the person who has registered and activated the EPA with the High Court. A court appointed committee may also have authorization (but not always, usually specified purposes) over a person supported financial affairs.
  - 3.6.1. In relation to wards of court, directions shall be sought from the wards of court office and requests for funds directed to them.
  - 3.6.2. In situations where an EPA may be in place, this shall be confirmed by SPC to ensure that proper authorization is in place in relation to the person supported funds. SPC will request confirmation of EPA in writing.
  - 3.6.3. In the case of a Court Appointed committee, the specifics of the actual authorization shall be confirmed. SPC will request this confirmation in writing.
  - 3.6.4. Advice in relation to any of the above can be obtained from the HSE Patient Private Property Accounts (PPPA) central House in Tullamore. SPC Finance Manager will contact PPPA accounts for any necessary information.



## 4. Definition of Person supported 's Private Property

A Person supported 's Private Property account is defined in Section 2 of the Health (Repayment Scheme) Act 2006 as:

“patient's private property account means so much of the money and personal property of a person provided with in person supported services referred to in Section 53 of the Health Act 1970 (as amended by section 4 of the Health (Amendment) Act 2005), a person provided with institutional assistance under Section 54 of the Health Act 1953, a person in residence used wholly or partly as a setting to provide care for persons with physical or mental disability, or a person otherwise being cared for by, or on behalf of, the Executive due to a physical or mental disability or ill health, that is managed, on behalf of that person, by the Executive or by another person under an arrangement with the Executive whether before, on or after the commencement of Section 9.”

- 4.1. The following clarifies the above definition of person supported 's private property and includes examples of personal items such as:



- 4.2. It is the responsibility of all SPC employees to limit any loss or damage to a person supported property and personal items.
- 4.3. Proper records of the receipt of person's private property should be retained (Appendix 4 Asset List) and all items should be stored in a secure area. Procedures over the receipt and storage of valuables have to be followed in line with SPC Finance Pathway and Documentation.
- 4.4. Property may also include monies or documents such as birth certificate, passport, pension books, etc. that provide access to monies/or are legal documents to be held in safe keeping for the person supported.
- 4.5. There is a practical requirement on employees being aware of, or having knowledge of, the existence of any property in order to implement these guidelines effectively. SPC Person's Asset list (as per SPC Finance pathway) will ensure adequate recording of a person's property.

## 5. Roles and Responsibilities

There is a duty on all SPC employees to safeguard the person supported' funds and their property. This is ensured by appropriate governance and management systems to be followed, such as:

- SPC Finance Policy and Finance Pathway
- SPC audits (Annual and 6 monthly unannounced visits and any other SPC audit as per schedule)
- SPC Personal Planning Framework, which includes an annual spending plan
- Resident meetings
- Clearly defined responsibilities of keyworkers and team members

SPC is adopting the Human Rights-Based Approach and FREDA principles (Fairness, Respect, Equality, Dignity and Autonomy) to ensure the person's rights are protected and promoted. The Human Rights Based Approach is guiding all employees to ensure people living in SPC are supported to develop their skills in managing their own money.

### **5.1. Finance Manager/Department**

To ensure and oversee effective governance and management regarding people supported finances.

Finance department supports the Finance Manager in effective governance & management of person's finances and provide supports to persons supported and their staff teams by:

- monitoring persons expenditure sheets fortnightly for any discrepancies
- support all people living in SPC to access their finances
- issue quarterly bank statements for each person supported
- completing annual or as required finance audits as part of provider audits

### **5.2. Community Service Managers (CSM)**

The CSM, within their remit as registered PPIM for a designated centre, attend annual reviews as per Personal Planning Framework and ensure oversight and monitor management of finances through governance meetings and completing audits on provider level.

### **5.3. PIC/Team Leader**

The PIC/Team Leader of the designated centre where the person supported lives ensures that all employees who are responsible for handling the person supported' property and money are aware of the relevant regulation, SPC policy and follow SPC Finance Pathway.

And have a responsibility to complete and/or oversee the following duties (as per SPC Finance Pathway):

- Review and sign Person's Finances Daily Check book (monthly)
- Person's Expenditure sheets and receipts numbered (fortnightly)
- Person's Assets list and verify items purchased (as part of Personal Planning reviews)
- Expenditure sheet and wallet/purse balance (monthly)
- Items purchased are documented and verified on Person's Asset list (as part of PPF)
- Oversight of financial management through Personal Planning Framework (annual financial plan and monthly reviews) and completion of monthly audit as per Finance Pathway.
- If an employee reports a discrepancy, he/she and their Line Manager complete
  - 1) a Petty Cash Error form and forwards it to the Income Officer/Finance Department
  - 2) an incident form and HIQA monitoring notifications.

#### 5.4. Employees

All SPC employees, are required to make themselves familiar with the content of the SPC Finance Policy and Pathways and are responsible for implementation. This also applies to anyone who influences or is involved in decisions in relation to person supported' funds.

Those employees who are in direct support:-

- Develop an Annual Spending Plan in conjunction with the person as part of the person's annual review and visioning meeting (in line with Regulation 5, Health Act) (See Appendix X)
- Support the person to participate in management of their finances.
- Discuss Person's Finances/quality of spending as part of Personal Plan annual and monthly reviews.
- Develop a Risk assessment regarding Person's Finances.
- Support the person to check person's finances twice a day as part of handover documented on Person's Finances Daily Check Book (*Appendix 6 and 7*)
- Check of Person's Belongings and updated person's Asset list (*Appendix 4*) as part of Personal Plan Monthly Review.
- Number each receipt and enter on Person's expenditure sheet.
- Document purchases on Person's Asset list and review as part of Personal Plan monthly and annual reviews.
- If there is a discrepancy, check all documentation, monies and assets thoroughly, if discrepancy cannot be rectified, report to Line Manager immediately.

- 5.5. Person Supported funds held in the PPPA belong to the person supported and no other person. SPC has an implied trustee relationship with its person supported in respect of those funds.
- 5.6. If these funds are deposited into a deposit account any net interest earned on these funds belongs to the person supported.
- 5.7. SPC is committed to promoting the independence of the people supported to the greatest extent possible, consistent with the provision of safe and appropriate supports. In this context the person supported are encouraged and supported to make their own arrangements regarding safekeeping of their funds. However, where necessary SPC offers the PPPA service. SPC Finance Department is reviewing each person supported's funds twice a year to ensure that only a maximum of 10.000,- euro funds is kept in persons SPC account. SPC Finance Department is informing the person supported and their support team about this review in writing.
- 5.8. SPC has a duty to properly record and account for all movements in the funds held by it in safekeeping for person supported. In this context there is a computerised system in place. It is part of the overall package of supports for the person supported.  
SPC Access to Private Patient Account Pathway (*Appendix 8*) explains how to support a person to access their PPPA moneys.
- 5.9. The guidelines provided by the HSE are the main reference for guidance in relation to managing person supported' funds
- 5.10. The Finance Pathway gives clearly defined roles and responsibilities regarding Person Supported funds for all relevant levels of the organisation (*Appendix 1*).

## Persons Finances Pathway

### In line with SPC Personal Planning Framework

Meet with the person supported and

- Money Management Assessment form and review as part of the person's annual review & visioning meeting
- Complete the annual spending plan and review in line with person's roles at their visioning meeting
- Identify any skills teaching and learning opportunities to develop the role of the person managing their finances
- Promote the person's independence in managing their finances



## Person's Finances

### Person Supported by Staff team

- Meet with the person to complete their Money Management Competency Assessment Form
- Support the person to participate in the management of their finances
- Discuss the Person's Finances/quality of spending as part of Personal Plan annual and monthly reviews.
- Develop a risk assessment regarding Person's Finances.
- Meet with the person to check their finances twice a day as part of handover documented on Person's Finances Daily Check Book
- Check of Person's Belongings and updated person's Assets lists part of Personal Plan Monthly Review.
- Number each receipt and enter on Person's expenditure sheet
- Document purchases on Person's Asset list and review as part of Personal Plan monthly and annual reviews.
- If there is a discrepancy, check all documentation, monies and assets thoroughly, if discrepancy cannot be rectified, **report to Line Manager immediately.**

### PIC/Team Leader or designated person Responsibility with person supported

- Monthly or as required audit of Residents finances
  - Review and sign Person's Finances Daily Check book (monthly)
  - Person's Expenditure sheets and receipts numbered (fortnightly)
  - Person's Assets list and verify items purchased (as part of Personal Planning reviews)
  - Review expenditure sheet and Wallet/Purse balance (monthly)
  - Items purchased are documented and verified on Person's Asset list (as part of PPF)
  - Oversight of financial management through PPF (monthly reviews) and completion of monthly audit.
  - If an employee reports a discrepancy, the employee and Line Manager 1) completes a Petty Cash Error form and forwards it to Income Officer. And 2) completes an incident form and HIQA monitoring notifications.

### Community Services Manager Responsibility

- Attend annual and monthly reviews and monitor management of finances through meetings, audits, etc.

### Finance Department Responsibility

- Finance Department informs person supported about conducting person's finance audit (using Easy Read document)
- Annual or as required audit of Person Supported finances
  - Person Supported Finances daily check booklet
  - House internal audits
  - Person's files
  - Expenditure sheet vs. Wallet or Purse
  - Issue quarterly bank statements to Person Supported

**Income Officer will check Persons Expenditure Sheets fortnightly**

## Residents Finances Pathway Important Notes

### Management of person's finances as part of Person-Centred Planning

Supporting the person in managing their finances is part of Person-Centred Planning. Review of persons finances are not only part of daily checks but should be considered as part of peoples monthly and annual reviews to ensure roles and goals are identified and developed in line with the persons wishes and financial means. We should therefore consider the quality of spend for all items purchased (relevant and of value for the person supported) E.g. If a Person|Supported is accessing/attending a particular activity, is there evidence available that this is of particular interest/relevance to the Person Supported?

Finance Audit Tool is available to all managers and staff managers to ensure governance and oversight of persons finances and quality of spend.

Persons Assets lists to be used for all personal items of value including sentimental value and prescribed equipment

Please be mindful of the following:

- Monies received for specific items are to be entered onto the Resident's expenditure sheet and receipts copied to the Income Officer as with fortnightly money. If money is not spent within the fortnight, then it is to be represented to the Income Officer to be receipted back into Persons funds. No monies/receipts are to be brought home by staff, they must remain on the premises at all times.
- Persons Expenditure sheets should be brought to the Income Officer fortnightly regardless of Persons spend.
- If a receipt is missing and a new receipt is required, the **PIC/Team Leader** has to be the second signature for the new receipt.
- At no point should staff spend Person funds while off duty.
- At no point should staff spend own funds on items for the Person Supported and seek reimbursement after the fact.
- Monies have to be requested in advance (1 x week) by the Team Leader – if money is not available then planned expenditure must wait for funds to be made available.
- Financial Procedures when Supporting People with the Community should be followed at all times. (Appendix xx)



## 6. Person Supported Entitlements

- 6.1. Prior to admission SPC ascertains the financial status of a person supported. This is part of the admission process.
- 6.2. Once a person is admitted to SPC he / she will be informed and supported to claim entitlement from one of the following sources: -



- 6.3. Assistance and support will be given to the person supported in completing all the necessary documentation in relation to securing their full entitlements.
- 6.4. Records must be kept of each Person Supported entitlements financial or otherwise which should not only detail what those entitlements are but also highlight dates for renewals or changes especially where benefits are not automatically increased and or renewed. Due to the current system of SPC managing person's moneys, records and statements of those entitlements are kept with SPC finance department. People supported can access those records and statements at any time and should also be outlined on the person's annual spending plan.
- 6.5. Entitlements received by a person supported is the property of the person and should be treated in such a manner.
- 6.6. The person supported has the right to use and have access to their personal money and property.

## 7. Assessment of and competencies in making financial decisions

- 7.1. A "functional approach" should be adopted to determine capacity of a person to manage his/her finances and property. SPC as a provider assumes that people living in SPC are capable of decision-making; however, capacity may fluctuate across time and according to the decision being made. A person should not be regarded as being incapable of managing their money or being involved in its management unless all practical steps to enable him/her to do so have been taken without success.
- 7.2. A person should also not be regarded as being incapable merely because the decisions he/she reaches appear to others to be unwise.
- 7.3. Each person living in SPC will be supported to complete the "Money Management Competency Assessment Form" (Appendix 2) to assess capacity to handle their financial affairs as part of the Personal Planning Framework and to be reviewed every year as part of the Annual Review, or earlier as necessary. The Money Management Competency Assessment Form is to be

completed by the staff team and filed within the persons Finance Folder.

- 7.3.1. There is a general presumption that a person supported has the cognitive capacity to make their own decisions.
- 7.3.2. SPC shall assume a person has the capacity to make any decision unless there is a valid reason to be concerned that this may not be the case.
- 7.4. SPC shall not allow any person's funds in its safe keeping to be utilised for any purpose without the clear permission of the person other than where the person is unable to give permission due to lack of capacity.
- 7.5. SPC has no legal power to hand over, without their informed consent, the funds of any person supported to any other person other than where that person supported is a ward of court or has in place an operative EPA (enduring power of attorney) or is deceased (see procedures for dealing with transfers to third parties). All transfers to and from the PPPA Central Unit are part of the Person's Private Property system.

## **8. Financial services**

- 8.1. People supported are encouraged and facilitated to use the financial services available in the community as far as possible.

SPC has commenced a working group "Person supported bank accounts" in September 2021 to partner with financial institutions exploring options in implementing bank accounts for each person supported in line with regulations. A position paper on the outcomes of this exploration is available with the provider. SPC will explore the options arising with final implementation of the Assisted Decision-Making Capacity Act in 2022.

- 8.2. The use of bank accounts and cash cards should be evaluated and discussed with the person supported as far as possible.
- 8.3. In the case of a person not having the capacity to operate a bank account, SPC Finance Manager is acting as an agent for the person's income and ensure all safeguards are in place to manage person's finances. The person supported has access to his/her finances through SPC finance pathway.

## **9. Completion of the person's financial plan**

- 9.1. In line with the Human Rights Based Approach and Person-centred planning SPC is supporting each person to develop an annual financial plan to ensure a good life in line with the person's roles and also their financial means.
- 9.2. The keyworker and support team are developing the annual financial plan (Appendix 3) with the person in preparation for the annual review and visioning meeting.
- 9.3. The annual financial plan will outline the person's monthly income and regular monthly spending (e.g. rent, long stay contribution, memberships, sky/internet, etc.).

- 9.4. The annual financial plan will also outline other roles-based previous and planned expenditures, such as e.g. holidays, regular coffees, arts material, gym gear, etc.

## **10. Person supported Expenses/ Withdrawals of cash money**

SPC provides support to people with severe to profound intellectual disability. Many people living in SPC do not meet the current criteria set down by financial institutions to apply and sign for their own bank accounts.

SPC is continuously developing as a service and aims to provide person-centred supports based on Human Rights Based Approach and works towards the spirit of the Assisted Decision-Making Capacity Act 2015.

SPC Finance working group has explored options for all people supported in SPC to open their own bank account and therefore have unrestricted access to their own money. Based on this exploration with financial institutions not all people supported in SPC meet the criteria to open their own bank account at present and therefore avail of and are supported to access their money through SPC system, which is in areas restrictive but also ensures to safeguard each person's money and property.

As part of person centred planning, it is essential that each support team provides intentional opportunities for each person supported to develop their skills in managing their own money, through:-

- Involve each person in counting and checking their personal money on a daily basis
- Encourage paying for their own items as part of the consumer role
- Involve each person in collecting and counting their money when collecting from Finance Department
- Ensure role and skill development for each person through their visioning and monthly reviews.



For people supported living in SPC without their own bank account, cash is available Monday to Friday within SPC Finance Department working hours. The Person can access as much cash as needed, provided sufficient time is given to withdrawal of funds from the bank. For certain purchases please adhere to guidance as per "Finance Flowchart Person Supported Requests" (Appendix xx)

The PIC and support team must ensure that person supported have access to their finances and financial information if they so wish. The person supported shall be involved in their daily finance checks.

When purchases are being made employees must check the current balance and record on the expenditure sheet how much was given to the person supported/or taken to purchase items for the person supported and for what items.

A receipt must be held with the expenditure sheet, initialled by the employees who made the transaction, and the new balance recorded. The expenditure sheet is to be initialled by two employees, in homes where two employees are on duty, or by the employee on duty for single staffed homes following each withdrawal/lodgement. Receipts must be returned to the Finance Office for allocating to each Person Supported account on Trojan.

Financial planning is being developed with the person at their annual visioning meeting. Additional circle of support meetings can be facilitated when supporting a person to spend their money.

Finance Department and the support team to involve the person in collecting their money.

Person Supported monies and records will be kept in a locked filing cabinet / safe at all times in the person's home. Employees on duty will facilitate person supported accessing their money.

All person's expenses/withdrawals shall be vouched for.

All transactions must be signed by the designated staff member(s) at the time that the transaction occurs, using SPC expenditure sheet.

The expenditure form is to be filed on a monthly basis after 'top up' meeting with income officer in the Person Supported personal file.

The employee must check the balance and sign for all withdrawals and lodgements. When two employees or more are on duty, both employees must sign.

Person Supported monies cannot under any circumstances be used as a loan to another person supported or by an employee to purchase their snacks while out. All employee snacks should be purchased from the Petty Cash Float.

## **11. Person's Asset List**

- 11.1. The personal property of each person supported in SPC will be treated with due care and diligence at all times and information will be held on a Persons Asset List (Appendix 2).
- 11.2. The staff team will ensure that the Asset List for each person supported will be held in hard copy format in their personal file and reviewed on a monthly basis as part of their Personal Plan monthly review. This Asset List will be easily accessible to person supported, support staff, designated family members and inspectorate personnel.
- 11.3. Personal property may be purchased by the person supported or gifted by a friend or family member.
- 11.4. To sustain the usefulness of the Persons Asset List, it is vital to maintain and update it; to this end SPC has the following process in place: -
  - The PIC/TL or designated person will review each person's Asset List on a monthly basis ensuring that it is always an accurate description of the property owned by the person supported and will hold an account of deterioration of any asset owned by a person supported.
  - On the completion of each review and update the personal property register must be signed and dated by the PIC/TL or designated person.
- 11.5. Concerns in relation to person's personal property  
The PIC of the designated centre where the person lives, the Finance Manager and Director of Services will be contacted in relation to any concerns about the lack of safe keeping or exclusive use of private property of any person supported in SPC and it will be recorded as a formal complaint under SPC Compliments, Comments and Complaints procedure and investigated by the designated complaints officer.

## **12. Procedure for checking and auditing person supported finance**

- 12.1. SPC Finance Pathway is a comprehensive system to safeguard person's finances and property and ensure good governance & management when supporting people in managing their finances and property.
- 12.2. It is the responsibility of all employees to protect people supported from financial abuse by adhering to best practices.
- 12.3. Financial audits shall be completed as per SPC Finance pathway by:
  - staff team through daily/nightly checks of person's finances
  - staff team and line management through annual and monthly Personal Plan reviews
  - PIC/Team Leader audits and finance checks
  - PPIM through oversight via attendance at annual reviews and review of audits
  - audits completed by SPC Finance Department.

### **13. Reporting of Irregularities**

- 13.1. It is the responsibility of all employees to ensure the person's finances are correct at the end of each shift. Any anomalies must be reported immediately by completing the Cash Error Form. Cash Error Forms must be signed by the PIC or Team Leader, or in his/her absence the relevant CSM. All Cash Error Forms must be sent to the Income Officer for review and approval from the Finance Manager.
- 13.2. Any member of staff who considers that there may have been an irregularity or unaccounted cash errors that could lead to misappropriation of funds or an instance of fraud should report this immediately to their PIC/Team Leader.
- 13.3. A copy of the Cash Error Form will be filed in the Finance Office.
- 13.4. Anomalies include as follows:
  - A missing receipt.
  - A hand written receipt [other than previously approved].
  - Cash available not in accordance with the Person supported Expenditure sheet.
- 13.5. If the PIC/Team Leader cannot identify the error in relation to the missing funds, an incident form and safeguarding internal notification must be completed. An investigation process may be instigated. And Garda Siochanna and HIQA to be notified as part of the safeguarding process.
- 13.6. The Person Supported Funds will be audited on a monthly basis through the PPF monthly reviews and by the Finance Team annually.
- 13.7. The Provider will also commission annual audits of person supported finances by an independent external agency / organization as part of the external finance audit of the company.



## 14. Person supported Funds versus St. Patrick's Funds - Who should pay for what?

- 14.1. As we support people within their homes and within community settings, we need to consider what our support role looks like. Having meals together both at home and out and about with the people we support is normative and encouraged. SPC must ensure that we support people in a transparent and from a value for money approach.
- 14.2. It is incumbent on all employees who are involved in meal planning and shopping to do so from a balanced nutritional perspective, inclusive of dietary requirements and in the most person-centred and also cost-effective manner.

**Outlined below are some scenarios to clarify purchases and responsibilities for payment:**

<b>Coffee Shop Visits</b>	If a person supported is going to the coffee shop for coffee and cake, they pay for this refreshment themselves. We expect the staff member to also order a drink and accompany them during their refreshments. SPC will cover the cost for a drink to the value of €3.00 but if the employee wishes to have food also then they pay for this themselves.
<b>Community Refreshments</b>	If a person is supported to purchase additional items whilst out e.g. take away drinks, minerals, ice-creams they will pay for this themselves and if staff wish to purchase also they pay for this themselves.
<b>Meals Out</b>	If someone is going to a restaurant/cafe for a meal, they pay for this themselves. We expect the employee to also order a drink/food and accompany them during their refreshments. SPC will cover the cost for a food/drink to the value of €8.00 but if the staff member wishes to have food/drink that costs more than this they pay the balance themselves.
<b>Cinema/Concert Visit</b>	Going to the Cinema the person will be supported to pay for their own entrance ticket and snacks. SPC will pay for the staff members entrance tickets only. If the staff members wish to have snacks, then they pay for these themselves.
<b>House Meals</b>	SPC provide a budget for house groceries (in line with the dietary needs of the people supported), this budget facilitates the purchases of meals that can be shared collectively between the people supported and employees SPC do not provide the budget for specific staff dietary requirements. Employees should not be cooking separate or different meals for themselves – they are welcome to the meal on offer or they provide their own food.
<b>Take Away Meals</b>	<p>The person may choose to have a take away meal and will pay for this themselves. SPC do not pay for take-aways but employees can purchase their own if they wish or alternatively eat something from the house groceries at the same time.</p> <p>SPC Operations team and Finance department are actively reviewing all receipts and quality of spend to ensure that SPC and the supported person's expenditure is in line with the above narrative.</p>

	<p>All takeaways and eating out must be in line with people's dietary and nutritional requirements. Disproportionate amount of take-aways or meals out is not considered in line with support people's health and financial well-being.</p> <p>All employees should consider what is the normal, proportionate practices of other citizens with regard to a person's financial means, social and health needs.</p>
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**Bank statements are provided to the person supported regularly. The support team to ensure bank statements are communicated to person supported and filed within person supported finance folder. This information is available to families during visits to the person's home, if they wish (please refer to Ways of Working "How to communicate person's finances with family members)**

<p><b>Other Items</b></p> <p>With regard to "who pays for what" other items people may want or need please see lists: -</p>	Person Supported Own Monies
	<ul style="list-style-type: none"> <li>• Sweets and treats</li> <li>• Toiletries incl. sun cream</li> <li>• Transport for social activities – Taxis or through T &amp; T in SPC vehicles</li> <li>• Social Activities – entry costs etc</li> <li>• Magazines, newspapers, books, DVD's, cd's</li> <li>• Mass cards, church donations</li> <li>• Photographs, canvas, frames, pictures for personalisation</li> <li>• Arts, crafts, hobbies - items</li> <li>• Furniture over and above standard bedroom furniture</li> <li>• Bed linen, towels etc</li> <li>• Clothes</li> <li>• Take away meals</li> <li>• Meals Out</li> <li>• Clothes alterations</li> <li>• GMS levies up to €40 per month</li> <li>• Dental &amp; Doctor Consultations</li> <li>• Celebrations (incl. of cakes, gifts etc)</li> </ul>
	Saint Patrick's Centre House Float/Funds
	<ul style="list-style-type: none"> <li>• House Groceries</li> <li>• Household items</li> <li>• Entry costs to social activities for staff only</li> <li>• Employee snack/meal entitlements as above 12.1 &amp; 12.3</li> <li>• Furniture for communal areas</li> <li>• Standard bedroom furniture</li> </ul>

## 15. Person supported Charges and Refunds

### Legislative Framework

“RSSMAC Regulations” or “the Regulations” means the Health (Residential Support Services Maintenance and Accommodation Contributions) Regulations 2016 (S.I. No. 467 of 2016) as amended by the Health (Residential Support Services Maintenance and Accommodation Contributions) (Amendment) Regulations 2019 (S.I. No. 106 of 2019).

The legislative framework “RSSMAC Regulation” guide the Health Service Executive (HSE) and providers of residential support services on the HSE’s behalf (“section 38 agencies”), to correctly determine the income related Standard RSSMACs required to be paid by people supported using a service. Providers must ensure that the operation of the RSSMAC framework is in accordance with the RSSMAC legislation and guidelines, and internal HSE National Financial Regulations and standards.

#### 15.1. Charges

The regulations provide the statutory basis for the imposition of charges for persons in receipt of services whether or not such persons have full or limited eligibility. The regulations provide for different classes of person on whom charges can be levied and the maximum charge which can be imposed in respect of each class.

SPC Long Stay Contributions are as follows:-

Class A

Class B

Class C

15.2. All charges are included in the Provision of Service Documentation and are communicated to each person supported, which is evident on their individualised Easy Read documentation.

#### 15.3. Assessment of Ability to Pay Charges

The regulations provide for an Assessment Form to be completed by the person supported on the relevant charge. Assessment Forms should be filed on each patient’s/Person Supported file.

#### 15.4. Allowable Expenses

Charges may be reduced or waived in order to avoid undue financial hardship having regard to the person’s financial circumstances. Expenses may be allowable when calculating the appropriate charge (as per list in Long Stay Contributions).

#### 15.5. Documentary Evidence

Where expenses are being allowed as part of the assessment process, documentary evidence should be obtained and attached to the assessment file.

#### 15.6. Appeals

In cases where the person supported or their family member as appropriate, are dissatisfied with the Authorised Officer’s decision regarding the amount of the charge, they may appeal the decision to the relevant Appeals Officer. The person supported, should be advised of the appeals process on being notified of the charge.

#### 15.7. Refunds of Charges for Home Visits

- 15.8. SPC makes a refund of charges to the person supported. Where the person supported spends a night at home. This is called a “bed night” and each “bed night” is refunded at the daily rate charged to the person supported.

Full Guidelines on charges and refunds is available on:

<https://www.hse.ie/eng/services/news/newsfeatures/longstaycontributions/national-rssmacs-general-implementation-guidelines.pdf>

## **16. Patient Private Property Accounts (PPPA) Guidelines**

- 16.1. The Health Service Executive (HSE) operates in excess of 15,000 Patients’ Private Property Accounts (PPPA’s) for clients at over 170 locations nationally. These accounts are generally held on behalf of people who live in long term residential care, primarily within the following services:
- Older People
  - Mental Health
  - Intellectual Disability
  - Physical and Sensory Disability
  - Acute Hospitals (long stay)
- 16.2. The purpose of this document is to set out the procedure to be followed by HSE employees, or agents, in the administration of clients’ patients’ private property.
- 16.3. The following Guidelines set out the steps that must be taken to ensure that the interests of the client are protected and gives clear guidance to HSE employees in the management of clients’ property in the care of the HSE. This document provides clear guidance on the use of funds for the benefit of clients, particularly where a client may not have full capacity to manage, or to make decisions around the best use of their funds.
- 16.4. SPC assumes the role of Trustee in the administration of the financial affairs of people supported living in SPC
- A record of the person supported is held within the service.
  - Funds held by St. Patrick’s Centre Kilkenny Ltd., are safeguarded for their direct benefit and their benefit alone.
  - Each Person Supported ability to derive benefit from any item or service that might potentially be purchased using their funds must be assessed in the context of the User’s overall Care Plan.
  - It is imperative that there is a clear audit trail distinguishing individual’s transactions and funds.
  - It should be noted that funds raised by St Patrick’s Centre from Charges correctly levied under relevant legislation are St Patrick’s Centre funds and cease to be the Person Supported funds once collected.

### **16.5. Support for Staff in Making Decisions**



- Reference should be made to the Person supported Private Property Guidelines of the HSE and the Health (Charges For In-Person supported services) (Amendment) Regulations 2011).
- Staff should consult with their PIC/Team Leaders in the first instance and the request should be certified by the Team Leader before presenting it to the Finance Manager.
- The Finance Manger should give reference to 1 and 2 above and subsequently check the PPPA that adequate funds are available.

#### 16.6. Appeals

Any appeal must be made in writing to the CEO.

Full guidelines available on:

<https://www.hse.ie/eng/services/list/4/olderpeople/pppaccounts/>

<https://www.hse.ie/eng/services/list/4/olderpeople/pppaccounts/patients-private-property-guidelines.pdf>

## 17. Appendix 1 SPC Finance Pathway

### **Persons Finances Pathway**

#### **In line with SPC Personal Planning Framework**

Meet with the person supported and

- Money Management Assessment form and review as part of the person's annual review & visioning meeting
- Complete the annual spending plan and review in line with person's roles at their visioning meeting
- Identify any skills teaching and learning opportunities to develop the role of the person managing their finances
- Promote the person's independence in managing their finances



## Person's Finances

### Person Supported by Staff team

- Meet with the person to complete their Money Management Competency Assessment Form
- Support the person to participate in the management of their finances
- Discuss the Person's Finances/quality of spending as part of Personal Plan annual and monthly reviews.
- Develop a risk assessment regarding Person's Finances.
- Meet with the person to check their finances twice a day as part of handover documented on Person's Finances Daily Check Book
- Check of Person's Belongings and updated person's Assets lists part of Personal Plan Monthly Review.
- Number each receipt and enter on Person's expenditure sheet
- Document purchases on Person's Asset list and review as part of Personal Plan monthly and annual reviews.
- If there is a discrepancy, check all documentation, monies and assets thoroughly, if discrepancy cannot be rectified, **report to Line Manager immediately.**

### PIC/Team Leader or designated person Responsibility with person supported

- Monthly or as required audit of Residents finances
  - Review and sign Person's Finances Daily Check book (monthly)
  - Person's Expenditure sheets and receipts numbered (fortnightly)
  - Person's Assets list and verify items purchased (as part of Personal Planning reviews)
  - Review expenditure sheet and Wallet/Purse balance (monthly)
  - Items purchased are documented and verified on Person's Asset list (as part of PPF)
  - Oversight of financial management through PPF (monthly reviews) and completion of monthly audit.
  - If an employee reports a discrepancy, the employee and Line Manager 1) completes a Petty Cash Error form and forwards it to Income Officer. And 2) completes an incident form and HIQA monitoring notifications.

### Community Services Manager Responsibility

- Attend annual and monthly reviews and monitor management of finances through meetings, audits, etc.

### Finance Department Responsibility

- Finance Department informs person supported about conducting person's finance audit (using Easy Read document)
- Annual or as required audit of Person Supported finances
  - Person Supported Finances daily check booklet
  - House internal audits
  - Person's files
  - Expenditure sheet vs. Wallet or Purse
  - Issue quarterly bank statements to Person Supported

**Income Officer will check Persons Expenditure Sheets fortnightly**

## Residents Finances Pathway Important Notes

### Management of person's finances as part of Person-Centred Planning

Supporting the person in managing their finances is part of Person-Centred Planning. Review of persons finances are not only part of daily checks but should be considered as part of peoples monthly and annual reviews to ensure roles and goals are identified and developed in line with the persons wishes and financial means. We should therefore consider the quality of spend for all items purchased (relevant and of value for the person supported) E.g. If a Person Supported is accessing/attending a particular activity, is there evidence available that this is of particular interest/relevance to the Person Supported?

Finance Audit Tool is available to all managers and staff managers to ensure governance and oversight of persons finances and quality of spend.

Persons Assets lists to be used for all personal items of value including sentimental value and prescribed equipment

Please be mindful of the following:

- Monies received for specific items are to be entered onto the Resident's expenditure sheet and receipts copied to the Income Officer as with fortnightly money. If money is not spent within the fortnight, then it is to be represented to the Income Officer to be receipted back into Persons funds. No monies/receipts are to be brought home by staff, they must remain on the premises at all times.
- Persons Expenditure sheets should be brought to the Income Officer fortnightly regardless of Persons spend.
- If a receipt is missing and a new receipt is required, the **PIC/Team Leader** has to be the second signature for the new receipt.
- At no point should staff spend Person funds while off duty.
- At no point should staff spend own funds on items for the Person Supported and seek reimbursement after the fact.
- Monies have to be requested in advance (1 x week) by the Team Leader – if money is not available then planned expenditure must wait for funds to be made available.
- Financial Procedures when Supporting People with the Community should be followed at all times. (Appendix xx)

## Appendix 2 MONEY MANAGEMENT COMPETENCY ASSESMENT FORM

### MONEY MANAGEMENT COMPETENCY ASSESMENT / CIRCLE OF SUPPORT MEETING



Details of meeting	
Person Supported Name	
Date of Birth	
Attendees	
Date of meeting	
Please complete 3 financial examples of below	
<p>3 financial transactions (e.g. paying rent/membership, buying new clothes, shopping for toiletries, collecting finances from Income Officer etc.): –</p> <ul style="list-style-type: none"> <li>- please outline communication techniques used by and with person supported</li> <li>- describe if and how the person showed financial autonomy during those transactions (e.g. if a jumper costs 30 euro and I lay out 5 x 20 euro notes would person supported being able to</li> <li>- describe how person's rights are upheld in relation to their finances</li> <li>- what training and education has been trialled in relation to building financial capacity with the person</li> <li>- staff observations during the financial transactions</li> </ul>	
Example 1	
Example 2	
Example 3	



The following might help you to complete financial transactions above with the person supported:					
What is the person's main communication strategy?					
The person can communicate their choices.					
The person goes shopping (support?)					
The person can pay for items purchased without support.					
The person recognises money and its value?					
The person knows what income/funds they have?					
Does the person understand what a bank account is and how it works?					
Can the person memorise a pin number?					
Can the person use a cash machine?					
The person engages in daily checks of their finances.					
The person can sign with their own name.					
The person understands signatures					
Additional information regarding financial competencies					
Areas of concern					
Identify level of support required					
Fully Supported		Partly Supported		Not Supported	
Outline the justification for the decision made					
Where partly or fully supported – please identify areas and level of support required					

Indicate how this support will be provided and by whom					
Identify the money management training needs for person supported					
Any other agreements reached in relation to money management (incl. training needs for employees)					
PIC Name			Signature		Date
Ward of Court (if applicable)			Signature		Date

## 18. Appendix 3 Annual Financial Plan



<b>Person Supported Annual Spending Plan</b>	<b>Year</b>

Person Supported	
Address	
Date of Birth	
Date discussed and agreed	
By whom?	

<b>Balance brought forward from last year (A)</b>	<b>Year</b>	
Private Patient's Property account		
SPC Account		
Ward ship account		
<b>Total Balance from last year</b>	<b>Subtotal A</b>	

<b>Annual expected income for this year (B)</b>	<b>Year</b>	
Disability Allowance (minus charges)		
Mobility Allowance		
Blind Pension		
Other		
<b>Total expected income for this year</b>	<b>Subtotal B</b>	

<b>Total income (A + B)</b>	<b>Year</b>	
Balance from last year (Subtotal A)		
Expected income for this year (Subtotal B)		
<b>Total income</b>	<b>Subtotal C</b>	

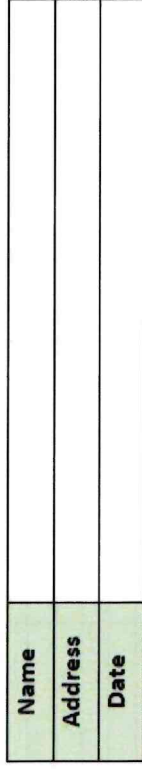


Expected expenditure for this year			Year	
Long Stay contributions	Type		€	
<b>Personal Items</b>				
Clothing			€	
Footwear			€	
Linens/towels			€	
Perfume/aftershave			€	
Hygiene products			€	
Makeup/Beauty treatments			€	
Jewelry			€	
CDs/DVDs			€	
Other			€	
(1) Total Personal Items			€	
<b>Discretionary Spending</b>				
Transport			€	
Leisure Centre/gym membership			€	
Health Insurance			€	
TV/SKY package			€	
Mobile Phone and credit			€	
Magazines/Newspapers			€	
Subscriptions			€	
Furniture/furnishings			€	
Other			€	
(2) Total Discretionary Spending			€	
<b>Holidays</b>				
Weekend breaks			€	
Annual Holidays			€	
(3) Total Holidays			€	
<b>Social Activities</b>				
Concerts/shows			€	
Gifts/flowers			€	
Meals out/Drinks			€	
Family occasions			€	
Other			€	
(4) Total Social Activities			€	
<b>Total Expenditure</b>		<b>(1) + (2) + (3) + (4)</b>	<i>Subtotal D</i>	€

Expected Closing balance for this year		Year	
Total Income (Subtotal C)		€	
Total Expenditure (Subtotal D)		€	
Estimated closing balance for this year	Subtotal C minus Subtotal D	€	

Signed PIC		Date	
Signed Keyworker		Date	

## Persons Asset List

[illegible]

## 20. Appendix 5 Expenditure Sheet

## Expenditure Sheet

Name:

[illegible]



## 21. Appendix 6 Finances Daily Check Book - Day

Person Supported Finances Daily Check Book

Day

Name	
Address	
PIC/ Team Leader	
Month	
Date	

	Balance as per Residents Expenditure Sheet €	Balance in Wallet/Purse €	Discrepancy If Any	Signature 1	Signature 2
1 <sup>st</sup>					
2 <sup>nd</sup>					
3 <sup>rd</sup>					
4 <sup>th</sup>					
5 <sup>th</sup>					
6 <sup>th</sup>					
7 <sup>th</sup>					
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28 <sup>th</sup>					
29 <sup>th</sup>					
30 <sup>th</sup>					
31 <sup>st</sup>					



## 22.Appendix 7 Finances Daily Check Book - Night

Person Supported Finances Daily Check Book	Night
--	-------

Name	
Address	
PIC/ Team Leader	
Month	
Date	

	Balance as per Residents Expenditure Sheet €	Balance in Wallet/Purse €	Discrepancy If Any	Signature 1	Signature 2
1 <sup>st</sup>					
2 <sup>nd</sup>					
3 <sup>rd</sup>					
4 <sup>th</sup>					
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31 <sup>st</sup>					

## 23. Appendix 8 PPPA Pathway

