

Policy on Managing Service Users Monies / Property.

KARE Policy Document.

Policy Owner: Manager Children and Adult Supports.

Rev. No.	Approved by the OMT	Approved by KARE Board	Launched at Heads of Units	Operational Period
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Rev 3.2	March 2017	April 2017	April 2017	April 2017 – Feb 2018
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Rev 3.7	August 2022	n/a	Sept 2022	Sept 2022 -

Section 1: Policy

1.1 Background to this Policy

This policy was first developed in 2009. The current version

is underpinned by National Standards, Guidelines, Regulation and Legislation including:

- Health Care Act 2007 (Care and Support of Residents in Designated Centres for persons (children and adults) with disabilities) Regulations 2013.
- HIQA National Standards for Residential Services for Children and Adults with Disabilities
- New Directions Interim Standards
- Patient Private Property Account [Patients Private Property Guidelines - HSE.ie](https://www.hse.ie/eng/health/privprop/pptg/pptg.html)

KARE policies relevant to this policy:

- Individualised Planning Policy
- Trust in Care
- Safeguarding of Vulnerable Persons at Risk of Abuse Policy
- Child Protection and Welfare policy
- Restrictive Practices Policy

and the report and findings from annual audit of Service Users money/property

1.2 Aim of this Policy

The aim of the policy is to ensure that individuals are empowered to manage their own money with the greatest degree of independence and that where required, staff support individuals with their money and property in a safe and transparent manner.

KARE aims to ensure all employees and volunteers engaged in any support of a person's finances or property are aware that financial and material abuse is an identified category within the Safeguarding Vulnerable adults from abuse and neglect National policy and procedure, and as such there is a significant responsibility that staff comply with this policy.

The procedures outlined in this policy are intended to promote safeguards for the individual, their families and the staff member when managing money and property.

Each individual supported by KARE will have an Assessment of Need / Review of Support Needs and this will determine the support required by the individual to make fully informed decisions about their finances, they should still be consulted and involved in those decisions to the greatest extent practicable.

1.3 Scope of this Policy

- The policy applies to all people working with/ supporting individuals on behalf of KARE.
- Support required by individuals living in a KARE house to manage their cash, current and savings accounts and property
- Support required by individuals in Local Services, Short Breaks and Pre-school to manage cash they bring to their service for activities, outings etc

Non-Scope

Areas and activities outside the scope of the policy are:

- Rates payable for activities.
- Charges/contributions for Residential and Short Break services
- Donations
- Financial investment advice
- Property of people who don't live in a KARE house
- Does not cover decision making regarding the specific use of an individual's money where necessary-this should be addressed through their Individual Support Plan

1.4 Policy Statements

1.4.1. General Statements

- 1.4.1.1 KARE will respect the privacy of individuals using the service and their entitlement to independence with regard to their own monies and property.
- 1.4.1.2 KARE will respect the choice and decisions of individuals using the service and will empower them to manage their own monies where possible. KARE will endeavour to provide training, advice or assistance to enable individuals to manage their own money. The individual may seek the advice of independent financial advisors, such as MABS, to enable better self-management of finances.
- 1.4.1.3 KARE will use the Individualised Planning Process to identify and agree with each individual their support and training needs with regard to the management of their monies and property. The level and nature of support required will be identified through the Assessment of Need / Review of Support Needs and the Individual Money Support Plan will detail how support will be provided and by whom i.e. staff and/or others. This will be reviewed on an annual basis or more frequently if required.
- 1.4.1.4 Individuals will be supported with their finances in accordance with their agreed Money Support Plan. This will, with due regard to the individual's needs, seek to provide support in a way that maximises their independence, dignity and welfare. If an individual decides to use their money to contribute to a group collection, their money support plan should identify that they have made an informed decision to do so.
- 1.4.1.5 Where an individual living in a KARE Community house requires support to manage their finances, as outlined in their assessment of need, all associated accounts will be in the individuals name and all relevant correspondence will be addressed to the individual to their KARE community house.
- 1.4.1.5 Where an individual living in a KARE Community house requires support with cash transactions and they are also supported with such transactions by another KARE service e.g. Local Service, the Social Care Leader will ensure that the Money Support Plan details how the Cash Control Record/s will be reconciled at the end of each month. In order to facilitate this, any unspent cash should be returned to the house at the end of each month or if more frequently at the end of the period as documented in their plan. Where an individual attending Local Service requires

support with cash transactions and also attends Short Breaks, their Money Support Plan developed by Local Service should clearly state the level of support required while in Short Breaks

The Short Breaks Leader should ensure there is a Money Support Plan developed for children who require support with cash transactions while attending Short Breaks.

Children in Pre School who receive support from staff to manage their money for outings / camps will have a documented Money Support Plan. Cash Control Record/s will be reconciled at the end of each outing / camp. In order to facilitate this, any unspent cash should be returned to the Childs Parent / Guardian along with a copy of the Cash Control form and associated receipts

1.4.1.6 Staff will ensure individuals are present, insofar as is possible, when staff are handling their finances.

1.4.1.7 It is paramount that money belonging to a person supported is managed with caution and all transactions are open and transparent. The individual will have access to any information pertaining to their financial affairs at any time, in the event that they don't it needs a restrictive practice management plan.

KARE will provide lockers/facilities for individuals to store their personal possessions in Local Service buildings and houses. KARE can take no responsibility, however, for any loss or damage to personal possessions.

1.4.1.8 KARE will provide information to individuals using the service and/or their family/representative about the importance of making a will and how they might do this should they so wish.

1.4.1.9 Where an individual leaves the service KARE will ensure their monies and property are returned to them as appropriate.

1.4.1.10 Where an individual living with KARE dies, KARE will hand over their monies/property to their Legal Personal representative as indicated in their will. Where the individual dies intestate i.e. without a will, KARE will hand over their

monies/property to a known Next of Kin; if there is no known Next of Kin KARE will take legal advice on what to do.

- 1.4.1.11 An individual and/or their family/representative or staff member should bring any concerns with regard to the management of an individual's finances and/or property to the relevant Leader/Manager. If the individual and/or their family/advocate are not satisfied with the response to their concerns they may make a formal complaint in line with KARE's Complaints Policy.
- 1.4.1.12 KARE will investigate any concerns of financial or material abuse reported using the appropriate policy e.g. Trust in Care, Safeguarding of Vulnerable People at Risk of Abuse. Financial abuse includes theft of an individual's monies or property, deception or pressure that affects their finances or property negatively and spending of an individual's money against their wishes or without their or their representatives consent.
- 1.4.1.13 Under no circumstances should staff use their own personal Loyalty Card or be the beneficiary of points/vouchers in a situation where the money for the transaction belongs to an individual who uses the service. Individuals using the service should be supported to have their own Loyalty Cards where they wish to do so
- 1.4.1.14 Under no circumstances should staff borrow money from an Individual using KARE Services and Supports
- 1.4.1.15 Any borrowing of money or possessions between Service Users should be carefully monitored by staff and where possible a record of borrowings should be maintained.
- 1.4.1.16 In cases where Individuals do not have access to their Money / Bank Cards – a restrictive practice assessment should be completed to ascertain if a Restrictive practice management plan should be put in place.

1.4.1.17 KARE recognises that some Individuals may request to have their money stored in a staff office – in such cases this arrangement should be clearly documented in the Individuals Money Support Plan.

1.4.2 Actively Supporting/ Managing an Individual's Finances

1.4.2.1 Where the need for a current or savings account is identified KARE will assist the individual in obtaining an account in their own name.

1.4.2.2 Where KARE are supporting an individual with their -account(s), the -account should be:

- in the individual's own name
- have a correspondence address which ensures that the individual and staff supporting them have access to statements and other relevant communication from the financial institution i.e. the residential house address
- set up to issue monthly statements on the account
- set up to access online-banking

1.4.2.3 Where KARE staff support/carry out transactions on an individual's account no other parties e.g. family, should be able to access the account This is to ensure accountability.

1.4.2.4 Where KARE staff support/carry out transactions on an individual's -account provision must be made to ensure account statements are available to the individual and staff so that they can verify all transactions.

1.4.2.5 The Leader will ensure that only designated staff member/s have access to an individual's personal financial information such as account details and PIN numbers. The Money Support Plan should outline how the individual's personal financial information including account details and associated PIN number/s will be kept secure.

1.4.2.6 Staff member will not act as a signatory on an individual's account.

1.4.2.7 A record will be kept of all financial transactions carried out by staff on behalf of an individual; receipts, invoices and statements will be kept on file to support this record in accordance with this policy. Staff will ensure that their signature on financial records is legible e.g. on receipts, transactions etc.

Where an individual needs support with spending a Gift Voucher a specific Cash Control Form should be set up to manage the expenditure of the voucher.

- 1.4.2.8 All records in relation to an individual's finances and properties will be stored in accordance with KARE's policy on Managing the records of people who use KARE's Services and Supports. Electronic records will either be held in the individual's folder on the service's Team site or on KARE CID

Where a payment is required to be made to a 3rd Party on behalf of the individual, this must be outlined in the Individual Money Support Plan

- 1.4.2.9 An individual and their family/advocate will have access to the record of their financial transactions and supporting documentation as agreed.
- 1.4.2.10 The designated staff member will review an individual's Account Control and Cash Control Record at the end of each month to check all transactions are recorded in line with transaction receipts. The staff member will sign 'End of Month balance' (staff member) section of the record to indicate they have completed the check. A staff member must not, under any circumstances, sign the record on behalf of an individual/their representative.
- 1.4.2.11 The Leader will review and approve the financial records kept in respect of an individual on a monthly basis. Account Control and Cash Control Records should be signed by the Leader no later than one month after that to which the records apply. At the end of each year all financial records relating to the individuals should be forwarded for archiving.
- 1.4.2.12 In the case of Community houses all RSSMACC and Rent receipts should be attached to the appropriate account control forms and included for archive
- In the case of Short Breaks, the Cash Control Record should be signed by the Leader or their Designate at the end of each stay and a copy sent home with the individual.
- 1.4.2.13 In circumstances where the balance on the account form and the balance in the cash box don't tally follow the steps below for inaccurate balances below:

Employees will immediately advise their Line Manager in the event or suspicion that monies have been removed or misappropriated by telephone call and followed up by completing a safeguarding report on CID.

Discrepancies that occur during reconciliation of account forms from the daily cash flow must be notified as soon as is practicable to the team leader. The person supported and employee from the previous shift should be contacted to request any information they may have about the discrepancy.

If the discrepancy can be amended and all monies fully accounted for, a detailed note should be made in the account control form. The team leader may wish to discuss the incident further with any employee or person supported to ensure such discrepancies do not happen again.

KARE has a zero tolerance approach to financial misappropriation and as a result when a discrepancy is identified that cannot be rectified the designated officer for adult protection is contacted and the appropriate reporting steps followed.

KARE will support Individuals to actively seek reimbursement of their monies, this could be through legal processes such as insurance claim , bank processes or other means.

Following due process, any employee found to have misappropriated funds of a person supported for their own benefit will be subject to the disciplinary procedures, up to and including dismissal. The matter will be brought to the attention of a Garda Síochána.. KARE will assist with any request for information requested by a Garda Síochána in the course of any investigation into misappropriated funds of people supported. It may be necessary to also report the incident to the Charities Regulator, HSE safeguarding team and HIQA.

- 1.4.2.14 Security - The responsibility for the security of person supported monies and the management of same in accordance with best practice lies with the team leader and service location.

It is essential that all staff are aware of their responsibilities to comply with security measures identified in each location.

In the case where a person supported accumulates larger amounts of money e.g. bequeathed, lottery winnings, unspent long term savings etc, the most appropriate management of these funds will be discussed with the individual, their family, KARE, independent advocate and/or legal team as necessary. All decision making in this respect is clearly documented and filed. Independent legal advice will be sought to ensure that KARE are meeting all legal and ethical responsibilities in a transparent manner.

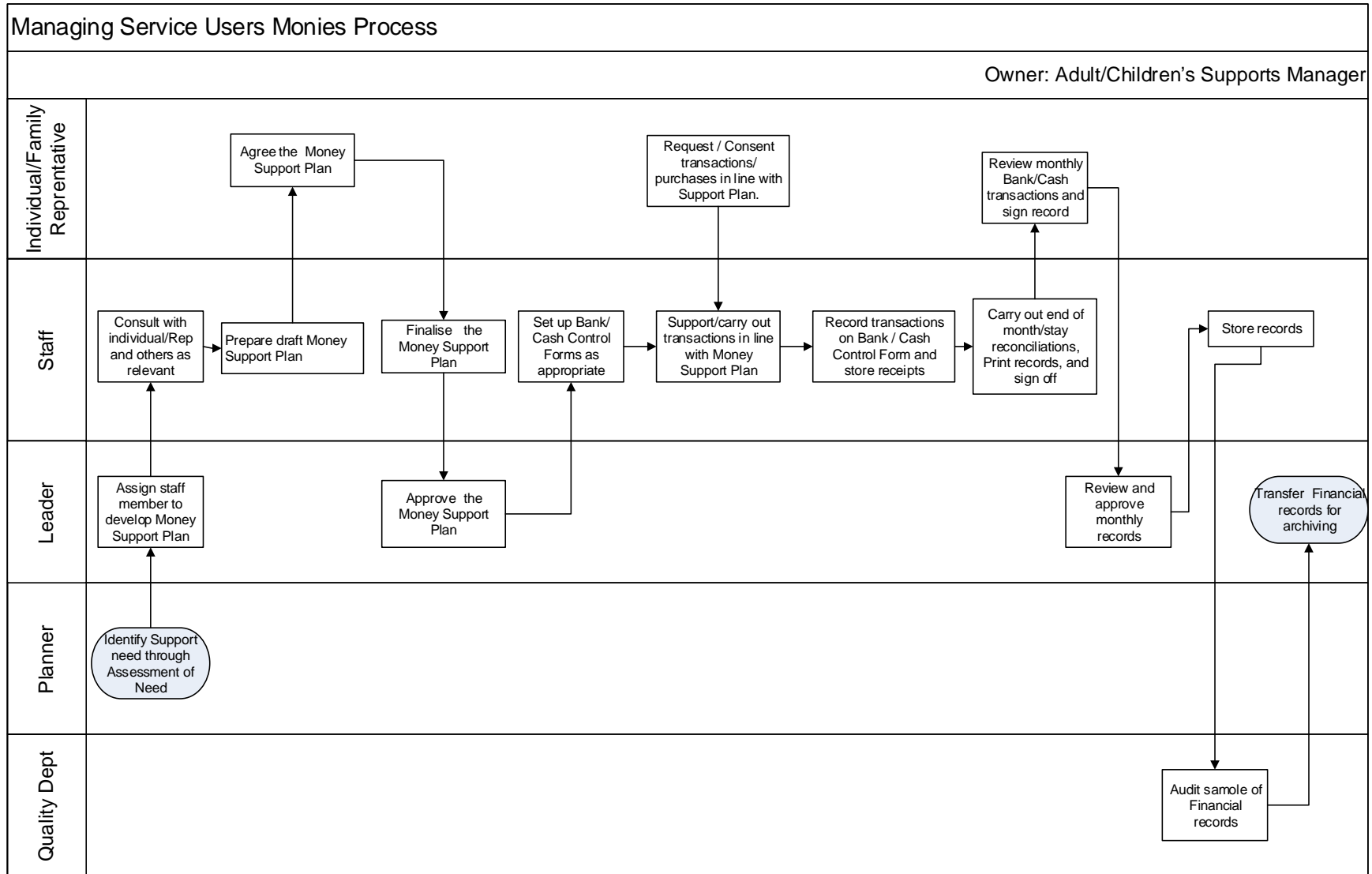
- 1.4.2.15 The Quality Department will ensure an annual audit of the financial records and monies kept in respect of individuals using the service is carried out. The audit will check the financial records of each individual for a period of a minimum of three consecutive months in the year prior to conducting audit. A report on the audit will be available to all relevant parties with recommendations outlined.
- 1.4.2.16 An individual's financial records for a given year may be transferred for archiving once they are checked and the audit completed. Audits should be completed by the end of Quarter 2 of the following year.

1.4.4. Management of Property belonging to Individuals living in KARE houses

- 1.4.4.1 The Leader will ensure there is a Property Support Plan and associated Property Log in place for each individual who lives in a KARE Community house. The individual and their family/representative should be involved in developing the plan as relevant. The Property Support plan and Property Log will be reviewed at least annually or more often if required e.g. if the individual moves house.
- 1.4.4.2 The individual will be given access to their Property Log when requested and their family / representative will also have access to this information if the individual wishes.

- 1.4.4.3 When a person moves out of a KARE Community House or leaves KARE services, their property and personal belongings will be returned to them/ transferred as agreed with the individual/their representative. If the person is moving location within KARE or transferring to another service, their Transition Plan will include details of how their property should be managed.
- 1.4.4.4 All buildings will provide secure storage for individuals to store their money / valuables; however the level of responsibility of KARE for its safe keeping will depend on the level of support an individual receives from staff.
KARE will ensure adequate insurance is in place to cover damages, theft or loss of property of people supported.
- 1.4.4.4. In the event of the death of a person living in a KARE Community House, their property will be returned to their family/representative in the absence of any instruction to the contrary.

Section 2: Process.



Section 3. - PROCEDURES

3.1 Money Support Plan

3.1.1 The Leader will ensure a Money Support Plan is developed for any individual who is supported with their current and savings accounts and/or cash. The plan will include, as relevant:

- the name of all accounts for which the individual needs support
- the type of support the individual requires
- who will support the person
- who will 'hold' the individuals -account number, ATM card etc.
- who will have access to the individual's account details and PIN number/s
- how the individual's account details and PIN numbers will be kept secure
- how the individual's cash will be kept secure
- who will have access to the individual's cash
- that the person has made an informed decision to contribute to collections
- name of the person who will sign the Individual/their Representative check at month end i.e. name of the individual or their representative
- the name and reference number of Loyalty Cards held by the individual
- details the support the Individual requires to manage their finances while attending Short Breaks

3.2 Managing /actively supporting an individual with their Accounts

Every Current and Savings accounts that the individual is supported to manage must have a corresponding account control form.

3.2.1 The designated staff member will prepare the relevant Account Control Form(s) for each month.

3.2.2 Each transaction will be recorded by the staff member carrying out the transaction on the Account Control Form i.e. lodgements, withdrawals, direct debits including:

- date of the transaction
- description of the transaction.
- amount of transaction in relevant column i.e. Money In / Money Out
- Name of staff member completing record

Note the Balance Column will be automatically calculated.

3.2.3 Where a paper record of the transaction / receipt is expected but not available:

- a paper receipt will be documented and signed by the staff member who carried out/supported the transaction and the individual.
- if the individual/rep is unable to sign another staff member should sign it if they are on duty at that particular time. Where there is no other staff on duty at the time, the line manager should sign *approval* for the transaction when they are next on duty.

3.2.4 The designated staff member will number the transactions dockets as per Account Control Form(s) and store in a secure location as agreed in the Individual Money Support Plan.

3.2.5 The designated staff member will reconcile the Account Control Form(s) for the month by:

- checking all transactions on the Account Control Form(s) are correctly entered
- checking the transactions against the statement
- entering any automated transactions not already entered.
- entering the Account Statement Balance in the Account Control Form(s)
- checking the 'Difference'. If it is not zero review the record and correct any errors.

3.2.6 The designated staff member will save the finalised Account Control Form(s) and print.

3.2.7 The designated staff member will sign the printed Account Control Form(s) and attach the related transaction records to the form.

3.2.8 The Individual and/or their representative, as identified in the Individual Money Support Plan, must review the finalised Account Control Form(s) and must sign as appropriate.

3.2.9 The Leader will check and sign the Account Control Form(s) and file securely together with the relevant statements until they are transferred to archive.

3.2.10 The Leader will ensure the transactions and account balance between the printed Account form and electronic account form match. The Leader must archive the

electronic form at this point. The form should be archived no later than one month after last transactions of the previous month using the archive feature on KARE CID.

3.3 Carrying out Cash Transactions

- 3.3.1 The designated staff member will prepare the Account Control Form.
- 3.3.2 The relevant staff member will record each cash transaction on the Account Control Form i.e. money received, and money spent, including
- date of the transaction
 - receipt number (number receipts sequentially)
 - description of the transaction
 - amount of transaction in relevant column i.e. Money In / Money Out
 - The electronic form, the Balance Column will be automatically calculated
 - name/signature of staff member completing record
- 3.3.3 Where a receipt for an expenditure is not available, the transaction will be documented and signed by the staff member who carried out/supported the transaction and the individual. If the individual is unable to sign another staff member should sign it.
- 3.3.4 The staff member will issue a duplicate receipt for any money received, giving the original to the person giving the cash and retaining the duplicate as a receipt.
- 3.3.5 The designated staff member will number the receipts sequentially and store in a secure location as agreed in the Individual Support Plan. Where an individual is in Short Breaks, the original receipt should be returned home with them and a copy the receipt clipped to the Account Control Record.
- 3.3.6 The designated staff member will reconcile the Account Control Form at the end of the month/Short Break stay or more frequently if agreed in the Individual Support Plan by:
- checking all transactions on the Account Control Form are correctly entered
 - checking there is a receipt for each transaction
 - counting the cash stored and enter amount in Cash balance

- checking the 'Difference' and if it is not zero review the record/cash and correct any errors.

3.3.7 If using an electronic form, the designated staff member will save the finalised Account Control Form and print.

3.3.8 The designated staff member will sign the Account Control Form and attach the related receipts.

Where an individual lives in a KARE house and cash has been sent to a Local Service, each location will have their own account control form. The completed associated Account Control Form and receipts from Local service should be attached as evidence of use of the monies.

3.3.9 The individual and/or their representative must review the finalised Account Control Form as agreed in the Individual Money Support Plan and must sign as appropriate. A staff member must never sign on behalf of Individual or representative.

3.3.10 The Leader will check and sign the Account Control Form, ensuring original receipts are attached. They will ensure these are stored securely until transferred to archive.

3.3.11 The Leader will ensure the transactions and account balance between the printed Account form and electronic account form match. The Leader must archive the electronic form at this point. The form should be archived no later than one month after last transactions of the previous month using the archive feature on KARE CID

3.4 Personal Property Plan and Managing an individual's Personal Property

3.4.1 The Leader will ensure a Personal Property Plan is developed for everyone who lives in a KARE Community House. The plan will be developed in consultation with the individual and/or their representative and should discuss items of personal belonging that the individual wishes to record on the Property Log.

3.4.2 The designated staff member will maintain a Property Log for each individual living in a KARE Community House as outlined in their Property Support Plan. The Log will include:

- the Item of property
- Date the item was entered on the log
- Description of the item providing sufficient detail so that the item can be identified
- Date the item was removed from the log
- Reason for removal of the item form the log
- Signature of staff removing the item from the log

3.5 Auditing the financial records kept in relation to individuals

3.5.1 The Quality Manager will ensure a plan is developed for auditing the financial records kept in relation to each individual in the organisation at least once a year.

3.5.2 The designated person will carry out the audit of an individual's financial records by:

- Checking three consecutive months of records-in the year prior to auditing records
- Checking compliance with the agreed Individual Money Support Plan
- Ensuring records of all transactions are completed and stored correctly
- Ensuring monies in the individual's account(s) and in cash tally with these records

3.5.3 The person carrying out the audit will sign and date each financial record checked and complete an audit report.

3.6 Procedure to be followed in the event of the death of an individual.

3.6.1 .The Leader will ensure that the Account Control records are up to date and the balance of cash held is correct.

3.6.2 The Leader will ensure that the individual's property is identified ready for handing over to their Next of Kin/Legal Personal Representative within 4 weeks of the individual's death.

- 3.6.3 Where the individual has left a will outlining their wishes in relation to their monies /properties, KARE will hand these over to the Executor.
- 3.6.4 Where the individual has died intestate i.e. without a will, KARE staff may hand over the individual's property/money to a known Next of Kin i.e. their closest blood relative or relatives. Where there is disagreement among Next of Kin or no known Next of Kin, the Assistant Manager will consult with the Adult Supports Manager and the CEO to agree the appropriate next steps.

Appendix 2

Property Support Plan/Log

Individual's Name: _____ KARE ID: _____
 Location: _____

What KARE need to do to support me with my personal property:

Property Log			
Item/Property	Date In	Date Out	Entered by / Comment

Note: This Plan/Log should be updated as changes occur and should be reviewed at least annually.

Date Reviewed:	Signed by: Individual/ Representative	Signed Social Care Leader:

Appendix 3

Monies Support Plan

Name:		KARE ID:	
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Level of Support required <i>as outlined in the Assessment of Need</i>	
I would like to be asked to contribute to group collections as they arise <i>This question is only relevant to people who require partial support as outlined above</i>	Yes/No
List of all Saving Accounts that Individual is supported to Manage	

Date plan developed/reviewed	People involved/consulted Was Service User Involved – Yes/No	Next review due

Support needed to Manage Account/s and/or Cash <i>(where relevant include who will hold details, ATM card. Details of sign off of and Cash Control Forms) Including support required while attending Short breaks where relevant</i>	Who will support Me

Name of Individual / Representative who signs off on end of month control;

Who has access to Accounts; _____

Loyalty cards

Name	Number