



Document Control

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Version Control

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| 1.0 | Financial Manager | Review | SMT |



1.0 POLICY:

Sunbeam House Services (SHS) client money property policy is written with regard to setting out the best practice in dealing with client money and property.

2.0 SCOPE:

This Policy applies to all staff employed by Sunbeam House Services (SHS), its Board and Agents.

3.0 ROLES AND RESPONSIBILITIES:

All staff working in SHS are responsible for complying with this policy. It is responsibility of the Senior Management Team to ensure that this policy is enforced.

Correct procedures must be followed so as to demonstrate accountability by staff and the organisation. Internal and external audits of client records and money will be carried out as part of best practice.

4.0 GENERAL CONDITIONS:

The level of support and assistance needed will vary from client to client and from time to time. Staff should encourage clients to become familiar with the use of money. Managing a personal income, handling cash, choosing between items of expenditure, owning personal possessions and the option to save purposefully are basic rights. These may also help promote self-esteem, self-respect and choice.

Staff also have a professional duty of care to all clients. Therefore, staff must:-

- Treat personal financial information and details of clients with appropriate confidentiality.
- Encourage clients to spend in a responsible manner.
- Exercise good judgement when advising clients how to spend money (see also Savings & Investments).
- Ensure that client money is only used for the personal benefit of that individual client.
- Refer to the Client Services Manager (CSM)/Senior Services Manager (SSM) any concerns in relation to misuse or inappropriate spending of client money.
- Monitor the changing support needs of clients.



- Communicate with other units in the organisation in order to provide an appropriate service to clients.
- Where applicable, ensure that records are maintained in respect of client money.
- Make every effort to ensure clients keep the minimum cash on their person and in the unit.
- Ensure that client who manager their own money are made aware of the to carry and store money/cards safely
- Must not under any circumstances borrow, take or accept gifts of money from clients
- Ensure client money is not loaned /borrowed to/by anyone
- Ensure clients do not contribute to any communal fund without their informed consent
- Ensure safe storage of their monies and valuables
- Records and receipts of possessions handed over for, or withdrawn from, safekeeping are kept up to date
- The CSM will ensure that clients have access to advocates and/or legal advice in any suggestion where it appears they are subject to any form of financial abuse by a third party.

5.0 ADMISSION OF A CLIENT TO THE SERVICE:

Where following admission it is deemed that a client needs support to manage their money and property, staff must ensure that a written record of the client's valuables/property is made and kept on the location. This record must be signed by two members of staff, one of whom is the CSM

On admission, and again thereafter as necessary, a ['Money Management Assessment Form'](#) must be completed and filed for each client. It is important to note that this form must be signed by staff that support the client in other SHS locations.

6.0 RECORD KEEPING AND SECURITY:

Where a client is deemed to need support with money, then staff must:-

- Keep a clear record of all transactions relating to the use of the clients money.
- Maintain records on an up to date basis, ensuring all information is available for audit.
- Use the appropriate format and record-books (red book).
- Ensure that all bank/credit union/post office books are kept secure under lock and key.
- Ensure that clients' cash/cheque etc. are kept in the safe (please note a medicine cabinet will not suffice).
- Maintain, sign and file receipts as necessary for all expenditure on behalf of a client.

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- Keep client cash to the minimum necessary.
- Ensure that only one bank account is in place for the purposes of day to day transactions.
- Ensure entries in the client record books are signed by two staff members.
- Ensure any restrictions on a client's access to money or the use of their money is referred to the Rights Review Committee.
- Maintain confidentiality and compliance with Data Protection.

7.0 CLIENT INCOME:

The SHS organisation and staff will advocate for clients with a view to ensuring that they can enjoy the full benefit of all income to which they are entitled. Income includes disability allowance, other allowances, pensions and all other forms of benefit/income to which a client is entitled. Once a client has the capacity, training and understanding they should be free to decide for themselves the purposes for which they spend their money. However, clients cannot be permitted to make a purchase or expend money that will endanger their safety, the safety of others or is illegal.

8.0 PAYMENTS TO A CLIENT FROM SHS:

All payment to clients must be in compliance with the SHS Payments to Clients Policy.

9.0 DEDUCTIONS FROM CLIENTS:

SHS does deduct/collect rent and other charges from clients. Any deductions from clients must comply with this policy.

10.0 ATM, DEBIT AND CREDIT CARDS:

ATM, debit and credit cards can be very useful. However, cards operated in conjunction with pin numbers present particular problems in relation to security. In supporting clients, staff must consider and weigh up client rights and freedoms against security and the duty of care to the client.

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11.0 INDEPENDENT CLIENTS:

Where a client is capable of understanding and managing their own money they must be facilitated to do so. Staff must not know/ask for PIN numbers, passwords or other security controls on client accounts in this situation, except as outlined under temporary training or exceptional arrangement outlined below.

12.0 CLIENT'S IN NEED OF SUPPORT:

Where the ability of a client has been assessed and they require either full or significant supports with money and bank accounts, then ATM, laser and credit cards are not to be used, except as outlined under temporary training or exceptional arrangement outlined below.

13.0 TEMPORARY TRAINING ARRANGEMENTS:

Where a client has been assessed as requiring some training/support for a short period before they will be able to manage their own money/accounts then staff may facilitate such training by way of knowing the PIN or other security controls for a client account **provided all of the following conditions are met:**

1. Written approval for a training plan must be signed by the relevant CSM and SSM. This must include a [Money Management Assessment Form](#).
2. Staff must maintain a written record of all transaction on behalf of the client in which they are involved or provide support. A client 'Red book' record must be used for this purpose.
3. The training period cannot extend beyond three months after which time
 - a. The client must change all PIN's or security controls and operate independently or,
 - b. The cards must be cancelled and staff support the client without the use of ATM/credit/debit cards.
4. Written records and confirmation of the clients ability to manage their money independently must be kept by way of an new Money Management Assessment Form completed at the end of the training period (max. period three months).

14.0 EXCEPTIONAL CLIENT ARRANGEMENTS:

All other situations such as dual mandate staff/client accounts (either or both can sign), multiple client accounts or other varied arrangements must be assessed on a case by case basis. Such arrangement can only be put in place following the written approval in advance

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of the relevant SSM. However if the SSM is a signatory on any account they written approval is require from the General Manager or Managing Director. All exceptional arrangement must be reviewed **after one year**.

Staff cannot arrange ATM, debit or credit cards for clients without the express written permission of the General Manager or Managing Director.

15.0 SAVINGS AND INVESTMENTS:

SHS will assist clients where they wish to access specialist advice regarding savings, investments etc. SHS will place clients in contact with duly authorised investment intermediaries. SHS and SHS staff are not authorised to give savings and investment advice.

16.0 BANK ACCOUNTS:

The term 'bank account' includes savings, deposit, current accounts with all types of financial institutions.

Where the ability of a client has been assessed and it is necessary to support the client by way of staff operating a bank account on their behalf, then the only authorised signatories permitted on the account are the General Manager, SSM, CSM or the clients keyworker with the **following strict limitations:**

1. An SSM or CSM can approval withdrawals/payment to **SHS** up to a limit of €5,000
2. An SSM can approval withdrawals/payment to **third parties (anybody other than SHS)** up to a limit of €1,500
3. A CSM can approval withdrawals/payment to **third parties (anybody other than SHS)** up to a limit of €750
4. A keyworker can only withdraw money if
 - a. The CSM is absent for a period of two weeks or more
 - b. A clients cash on the location has run-out and the client need money
 - c. The keyworker can only withdraw up to a limit of €50 per week unless they are given written permission by the General Manager or Managing Director
5. All transaction must be recorded in the clients record book.

17.0 CSM RESPONSIBILITY:

The CSM is responsible for reviewing client money records on a monthly basis to ensure that these are accurate and comply with policy.

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18.0 SPENDING OF CLIENT MONEY:

Where the ability of the client is such that staff are required to give full or significant support with money, the following requirements must be met by staff:-

- Client money can only be spent for the personal benefit of that client.
- Any expenditure over €750 must be cleared in advance with your area SSM. Expenditure over €1,500 must be cleared in advance through the Managing Director or the General Manager.
- Requests by family or other third parties for money or to access bank books must be cleared in advance through the Managing Director, who may in turn refer to Management or the Rights Review Group. Before a client's bank books or records are handed out to family or third parties, a written request must be completed and signed by the family member or third party. You must contact the Managing Director to obtain this form.
- Client money cannot be used to buy items which ought to be correctly purchased by SHS. If you have any queries or concerns, please contact the General Manager.
- Written records must be kept of all requests by family for purchases for or on behalf of clients. Where the amount given to families for or on behalf of the clients exceeds €40, families must return receipts for the money spent.

19.0 WILLS:

Clients should be encouraged to make a will, even where they have a small amount of property/savings. Staff and SHS will support clients by way of helping them access a suitable independent solicitor to assist in making their will. Clients must not be referred to the SHS solicitor unless you have prior written approval from the Managing Director

20.0 INSURANCE AND CLIENT PROPERTY:

SHS carries limited cover on client property. A significant excess operates on this policy, and so clients do stand to lose financially in the event of theft of their property.

Staff must make clients aware of this, and explain to them when considering purchases that they may be unable to recover the full value if those items are stolen. Staff must encourage clients to consider accessing their own insurance for any significant items.

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21.0 MAINTENANCE OF RECORDS:

Bank books, statements, receipts, red books and all other records relating to client money and property must be maintained on the unit and kept up to date. Records must be kept in relation to discussions concerning wills, insurance, bank accounts and communication with families concerning client money. Such records must be available for inspection by internal or external auditors.

22.0 CLIENT SUPPORTED HOLIDAYS:

Clients have continually indicated that they would like to be supported to go on holidays, both at home and abroad. SHS are willing to continue to do this but it must be cost neutral. CSMs will normally organise this but must adhere to the procedures and forms introduced by the GM on the shared server. This will include the requirement for letters signed by the client, where relevant and the family that they are aware that the holiday's costs include staff support costs. If a family has a concern with agreeing to a client going on a supported holiday, a client will have access to an advocate to resolve the disagreement.

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