

<b>Sunbeam House Services Policy Document</b>	<b>Client Money and Property Policy</b>
	<b>13 July 2021</b>



## Document Control

Policy Title	Client Money and Property Policy
Policy Number	035
Owner	Financial Controller
Contributors	Senior Management Team
Version	3.0
Date of Production	13 July 2021
Review date	13 July 2024
Post holder responsible for review	Financial Controller
Procedure Reference	PRO-005.050.1.0 Client Money and Property Procedure
Form Reference	F-005.089.1.0 Client Cash Book
Primary Circulation List	Shared Drive
Web address	N/A
Restrictions	None

## Version Control

Version Number	Owner	Description	Circulation
1.0	Financial Manager	Review	SMT
2.0	Financial Controller	Review and update	SMT
3.0	Financial Controller	Review and update in conjunction with Audit Committee Mar '21	SMT

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## List of abbreviations

Abbreviation	Meaning
CSM	Client Services Manager
SSM	Senior Services Manager
AON	Assessment of Needs (CID workflow)
MSP	Money Support Plan
CID	Central Information Database
MMAF	Money Management Assessment Form (CID workflow)
CPPL	Client Personal Property Log
FC	Financial Controller
CEO	Chief Executive Officer
MSP	Money Support Plan
CCB	Client Cash Book
BCF	Bank Control Form
EPA	Enduring Power of Attorney
PCD	Prepaid Debit Card

### 1.0 Policy

Sunbeam House Services (SHS) client money and property policy is written regarding setting out the best practice in dealing with client money and property. This policy is underpinned by the Health Care Act 2007 and has been developed by reference to:

- Health Service Executive National Financial Regulation - Financial Management in Community Residences NFR 14.
- Health Service Executive National Financial Regulation - Patient Private Property NFR 22.
- HIQA Guidance for Designated Centres – Residents’ Finances.

### 2.0 Scope

This Policy applies to all staff employed by Sunbeam House Services (SHS), its board, volunteers, and agents.

### 3.0 Roles and responsibilities

All staff or other personnel working with or in SHS are responsible for complying with this policy. It is responsibility of the relevant Client Services Manager (“CSM”) and the relevant Senior Services Manager (“SSM”) to ensure that this policy is enforced. Other specific

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responsibilities are set out below. Non-adherence to this policy will be considered a serious non-performance issue and any breach may result in disciplinary action.

Correct procedures must be followed to demonstrate accountability by staff and the organisation.

#### **4.0 General conditions**

Where possible, clients of SHS should control their own financial affairs in accordance with their wishes. Where clients need or want support in managing their financial affairs, staff may support them, but only in accordance with the requirements of this policy. It should be assumed that clients have capacity to make decisions about their money and property. Where residents do not have capacity to make fully informed decisions about their finances, they should still be consulted and involved in decisions to the greatest extent possible. However, clients will be supported where appropriate, to manage their finances and make good decisions in a responsible manner.

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 their money.

Staff have an ethical and professional duty of care to all clients. Therefore, staff must:

- Treat client personal financial information and details of their finances with the strictest confidentiality.
- Exercise good judgement when supporting clients in how they spend their money (see also Savings & Investments below).
- Ensure that client money and property is only used for the personal benefit of that individual client; any use of their money and property is consistent with the client's wishes; and is consistent with their personal care plan.
- Ensure that any deductions/payments by clients are in accordance with this policy and are made on a valid basis such as agreed care plans or Residential Support Services Maintenance and Accommodation Contribution (RSSMAC) legislation.
- Maintain clear separation between client's money and organisational funds.
- Ensure clients are present, insofar as possible, when staff are handling their finances.
- Support clients to the greatest extent possible so that they are not subject to deception or pressure that affects their property or finances negatively.
- Refer to the Client Services Manager (CSM)/Senior Services Manager (SSM) immediately on becoming aware of any concerns in relation to any actual or potential misuse, abuse or

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inappropriate spending of client money and record any such concern in line with the SHS's and mandatory reporting practices (see section 18 below).

- Ensure compliance with SHS Safeguarding Policy and HIQA Regulations & Notifications Timeframes (see section 18 below).
- Inform Gardaí where a theft is suspected or has occurred.
- All staff working with clients in locations must make themselves aware of the client's **Money Support Plan ("MSP")**.
- Ensure that accurate and up-to-date records are maintained in respect of client money and property.
- Ensure that clients who manage their own money/property are made aware of the need to carry and store money/cards safely and the need to safeguard their property.
- Staff must not, under any circumstances, borrow, take, or accept gifts of money or property from clients.
- Ensure clients do not contribute to any communal fund without their informed consent, and where they do contribute to a communal fund, ensure that the client's capacity to consent and their actual consent is documented in writing as part of their financial records.
- Ensure safe storage of client monies (must be kept under lock and key) and valuables where these are under the staff/organisation's management.
- Keep up to date records and receipts where possessions are handed in or withdrawn from safekeeping.

## 5.0 Admission of a client to the service

On admission a '**Client Personal Property Log**' must be completed for all clients and signed by the client/clients representative and the CSM. The Client Personal Property Log must be reviewed and updated at least every twelve months or as soon as client property is acquired or disposed.

On admission, and at least every twelve month thereafter, a '**Money Management Assessment Form**' (Workflow-CID) must be duly completed/reviewed for each client. This process must be informed by the client's assessment of needs.

Based on the '**Supports Needs Assessment**' and the '**Money Management Assessment Form**' ("MMAF"), an appropriate '**Money Support Plan**' ("MSP") must be developed, agreed and approved by the CSM/DCSM. The MSP must detail the support needed to manage bank and/or

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cash and what staff are supporting the individual in that regard; who will be signatories on account(s); who will have access to records; and who will know bank PIN numbers for cards/accounts. The CSM must make every reasonable effort to discuss the MSP, before finalisation, with the nominated family support contact for each client. It must be reviewed at least every 12 months by the CSM or more often if client or other circumstances require a review.

Where it is decided that an individual manages their own finances themselves either in part or in full, this decision will need to be clearly supported by reference to the data collected and documented in the individuals *'Assessment of Needs'*, *'Money Management Assessment Form'* and the *'Money Support Plan'*. If the evidence is not available to clearly support such a decision the CSM must seek additional advice from the SSM. The *'Temporary Training Arrangement'*, as set out below must be applied where it is decided that a client can manage their own money and property themselves.

Where a client is deemed capable of managing their own money independently, this arrangement must be reassessed every three months for a period of one year following admission to service. Instances where an existing client has achieved the necessary skills to manage their money independently the arrangement must be reassessed every year or more often if required. Each three-monthly reassessment must be documented by way of an updated MMAF and MSP for that client.

If a third party manages/supports the finances of a client, either in part or in full, this decision will need to be clearly documented in the MMAF and the MSP. If the CSM or DCSM have any concerns, then they must seek additional advice from the SSM.

On admission to any SHS service (residential, day or respite), where 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 and property is made and kept in the form of a *'Client Personal Property Log'* (must be completed within 28 days of admission).
- The *'Client Personal Property Log'* must be completed promptly in relation to any new property bought/received, or property damaged/destroyed/lost. This log must be reviewed at least annually by the CSM.
- A Client *Money Support Plan* is developed, agreed, and approved at the point of entry (must be completed within 28 days of admission).
- Client *'Client Cash Book'* (S.U.C.B) and *'Bank Control Form'* (B.C.F) are commenced immediately.
- An appropriate bank account in the name of the client is opened as soon as practicable that is in line with the bank's *'vulnerable customers accounts'* policy.

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- A *Client Contract of Care* shall be issued to the client (within 28 days of admission).

## 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 client's money. (SUCB and BCF)
- All transactions must be signed by two staff except where '*lone working*' occurs.
- Where '*lone working*' occurs then the staff member leaving a shift must balance the client money and must sign and insert the date and time to certify the balance at the end of their shift.
- Where '*lone working*' occurs the staff member coming '*on shift*' must check all balances to ensure they agree at the start of their shift. If the balances agree the person coming on shift must sign and insert the date and time for the balances and any material discrepancies must be notified to the CSM/SSM immediately on discovery.
- All entries made in a '*lone working*' setting must be marked/annotated '**Lone**' in the space for the second signature on a record.
- A receipt must be provided for each cash transaction and each receipt must be recorded as a separate line item in the appropriate bank or cash record (receipts are not to be aggregated).
- Maintain, sign and file receipts as necessary for all expenditure on behalf of a client.
- Receipts or other supporting records must be cross-referenced to the Bank and cash records. A new sequence of reference numbers must be started each month. (S.U.C.B. & B.C.F)
- Receipts or other supporting records must be stored safely and securely on the location. Appropriate envelopes or folders must be used for each month and for each separate client.
- Where a bank/financial institution/trader does not issue a receipt for a transaction then staff must prepare a receipt/record outlining the transaction briefly and include this in the client file in-lieu of the missing receipt, which in turn must be countersigned by the CSM within 14 working days.
- Maintain records daily, ensuring all information is available for audit.
- Use the appropriate format and records as set-down by SHS from time to time.
- Any changes, crossing-out of errors must be signed-off by the CSM or DCSM and must remain legible.



- Ensure that all bank/credit union/post office books, debit or other cards or records are kept secure under lock and key, unless the client manages these themselves.
- Ensure that clients' cash/cheque etc. are kept in the safe (please note a medicine cabinet will not suffice).
- Keep client cash to the minimum.
- CSM's must reconcile **all client bank accounts and cash records each calendar month** and within 14 days of the month end. (SUCB and BCF)
- Staff must ensure that only one bank account is in place for the purposes of **day-to-day transactions**. A second account may be operated for savings or to safeguard larger amounts of money.
- Ensure any restrictions on a client's access to money or the use of their money is referred to the Human Rights Committee.
- Maintain confidentiality and compliance with Data Protection legislation regarding all client money and property records/information.
- An SSM may refer a matter for review to the Financial Controller who will delegate a staff member or other suitable person to review records at any time and may initiate immediate review of any suspected policy breach that is detected or suspected.
- SSMs must perform spot-checks every two months in each of their locations. Their spot check must be planned so as include the records of at least one half of the number of clients in each location are reviewed in a one-year period, and SSMs must ensure all client records are spot-checked over a two-year period.
- SSM spot check must include a check of all record, documentation and procedures detailed in the Client Money and Property Procedure document and must be carried out in line with guidance issued by the organisation from time-to-time.
- On a risk assessed basis, SHS will carry out unannounced audits (using either internal or external reviewers) on at least one third of centres annually.
- Unannounced audits must include a check of all record, documentation and procedures detailed in the Client Money and Property Procedure as issued form time-to-time.

## 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, but only in accordance with this policy. Income includes disability allowance, other allowances or benefits, pensions, and all

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other forms of income to which a client is entitled. Where staff have any concerns, they must request advice from their SSM.

## **8.0 Family, Ward of Court, or third-party managing client money/property**

Where some or all of a client's finances or property are managed by a party or parties outside SHS, the organisation will engage with those parties to ensure the client's best interest and to ensure that the clients personal belongings/finances do not fall below a minimum standard consistent with their general well-being.

## **9.0 Client in respite, day service or other short-stay services**

Where clients avail of 'short-stay' respite services then staff must apply this policy to any client money/property brought on to the unit.

Where client money or property is returned to the client when s/he leaves the service(s), then the client or a family member/representative must sign for the return of cash, bank record/cards and property. The CSM must first reconcile the records (like a monthly reconciliation). The forms issued by SHS for cash/bank/property control (CPPL/MSP/SUCB/BFF) must be used to record the return of the client money/property and must be signed by duty staff member to:

- the day staff/bus escort or other staff member who is receiving the client and their property or
- the family member/representative collecting the money/property as the client exits the service.

## **10.0 Bank cards and on-line transactions**

Debit, money, or credit cards operated in conjunction with 'PIN' numbers present particular security concerns. In supporting clients, staff must consider and balance client rights and freedoms against security concerns; safeguarding clients and staff; and the duty of care to the client. The MSP should address these matters clearly.

Where a client is supported by SHS staff to manage their finances, either in part or entirely, then '**on-line**' or '**phone**' purchases/transactions using the clients main bank account/card are not permitted under any circumstances (See PCD's below). '**Cards on phones**' are not permitted under any circumstances for any client bank accounts. This may present issues for staff and clients in that the client may wish to purchase goods or services online or by phone. Therefore, online transactions on behalf of clients can only be carried out by using **Sunbeam House Services Debit or Credit Card** or a using **Prepaid Debit Cards** (PDC), set up in the name of the client.

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***Staff are not permitted to carry out transactions on behalf of client using their personal Debit or Credit Card, or the Debit or Credit Card of another third party.***

The PDC and associated email account should be set up in the client's name and this information is to be kept confidential and secure under lock and key. Such PCD can be topped up using the various options available on the card. Receipts for such top ups must be kept and maintained on the client's bank record.

PDC's must be viewed as having particular security issues and must be kept in a locked filing cabinet/press, to which only the CSM/DCSM have access. If a purchase is required, the CSM/DCSM should arrange to transfer only sufficient funds onto the PCD to make the purchase on behalf of the client.

The PDC card must only leave the location when required to add funds to them by the CSM/DCSM. Funds should only be transferred to the PDC when a purchase is required. A balance of not more than €100 should remain on the PDC after the relevant transaction and balances should only be in place if the PDC is required for an ongoing subscription or valid client expenditures that are correctly payable by the client.

The client's MSP must detail; the support needed to manage bank and/or cash and what staff are supporting the individual in that regard; who will be signatories on account(s); who will have access to records; and who will know bank PIN numbers for cards/accounts. Only the duly authorised staff as per the client's MSP can know or be passed the PIN numbers for client cards/accounts.

**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 Arrangements** or **Exceptional Arrangements** outlined below.

**12.0 Client's in need of support**

Where the ability of a client has been assessed (MSP & MMAF) and they require either full or significant supports with money and bank accounts, then a bank account in the name of the client must be opened promptly. The CSM must be a signatory on this account. The second signatory must be the DCSM or the client's key worker. The bank account:

- Must be in the individual client's name.

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- Have a correspondence address for the location in which the individual receives their primary service and ensures that relevant staff (including the CSM) have access to statement and other correspondence from the bank.
- Confirm and evidence that SSM has perform spot checks every two months in the location. SSM spot check must be planned so as include the records of at least one half of the number of clients are reviewed in a one-year period, and SSMs must ensure all client records are spot-checked over a two-year period. The account must be set-up to issue monthly statements accessible to relevant staff.

Where SHS staff support/carry out transactions on an individual’s bank account, then no other parties e.g. family members, can access that account unless this is clearly agreed as part of the client’s **Money Support Plan** and has been approved by the CEO as an **Exceptional Arrangement** (see below).

Bank accounts **must be** set-up to **issue monthly statements** accessible only to relevant staff so they can verify transactions. Where a bank/financial institution cannot provide a monthly statement on an existing account, staff must immediately seek to transfer the account to a bank/financial institution that can provide a monthly statement with the client’s permission. Should permission not be granted it should be made clear to the client that there may be a substantially increased level of risk to their personal finances.

The relevant CSM must ensure that only they, the DCSM (if in place) and the designated key worker have access to an individual’s personal financial information, bank account and especially bank PIN numbers. The individuals MSP must set out how the individual’s personal financial information, bank account and especially bank PIN numbers will be kept secure.

### 13.0 Temporary training arrangements

Where an individual is assessed as capable of managing their own finance entirely by themselves or 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 must implement a **Temporary Training Arrangement**. As part of the ‘**Temporary Training Arrangement**’ designated staff are permitted to know PIN or other security controls for a client account provided all the following conditions are met:

1. Written approval for a **Temporary Training Arrangement**. And a supporting training plan must be signed by the relevant CSM, SSM and the Financial Controller. This must include completion of a ‘**Money Management Assessment Form**’ and an appropriate ‘**Money Support Plan**’.
2. Staff must maintain written records of all transactions on behalf of the client they support.
3. The Temporary Training Arrangement period cannot extend beyond three months after which time:

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- a. The client must change all PIN's or security controls and operate independently – this decision must be fully supported by an updated **MMAF** and **MSP** or,
  - b. Staff and the CSM must implement an appropriately controlled and managed process that conforms fully to this policy.
4. Written records and confirmation of the client's ability to manage their money independently must be evidenced by way of a duly completed ' **Money Management Assessment Form**' and an appropriate '**M.S.P**' which must be completed at the end of the **Temporary Training Arrangement** period.

#### **14.0 Exceptional arrangements**

All other arrangements to support client money/property 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 a recommendation from an SSM and the written approval, in advance, of the CEO. All exceptional arrangement must be reassessed **after one year**.

#### **15.0 Savings and investments, wills and Enduring Powers of Attorney**

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

Clients should be encouraged to make a will, even where they have a small amount of property/savings. SHS staff will support clients by way of assisting them to access a suitable independent solicitor to make their will. Clients must not be referred to any solicitor normally engaged by SHS unless there is prior written approval from the CEO. Staff must not refer a client to solicitor used by the staff member. SHS will from time to time draw up a list of solicitors to support the process of making wills and staff must refer all queries on will to the Financial Controller or CEO for further advice.

If a client has the decision-making capacity to do so, it is important that they should consider putting in place an Enduring Power of Attorney ("EPA"). Clients must not be referred to any solicitor normally engaged by SHS unless there is prior written approval from the CEO. SHS will, from time to time, draw up a list of solicitors to support the making of an EPA and staff must refer all queries on EPA's to the Financial Controller or CEO for further advice.

SHS will endeavour to assist clients to access legal support including through the Legal Aid Board or other alternative support agencies where possible.

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**16.0 Bank accounts**

The term ‘bank account’ includes savings, deposit, current accounts, prepaid debit card and credit card accounts with all types of financial institutions including incorporeal banks and 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 CSM and either the DCSM (if in place) or the clients keyworker with the **following strict limitations:**

- A CSM/SSM can approve withdrawals/payments from a client’s bank account to **SHS** up to a total limit of €5,000 per annum – this approval must be evidenced in writing and the written record(s) must be stored as part of the client’s financial records.
- A CSM/DCSM can make withdrawals/payment to **third parties (other than SHS)** up to a limit of €750 – all transactions must be compliant with this policy.
- An SSM can approve withdrawals/payment to **third parties (other than SHS)** up to a limit of €1,500 - the written record(s) must be stored as part of the client’s financial records.

A keyworker can **only** withdraw money if:

- This is documented/agreed in the client’s MSP, and the CSM/DCSM is absent for a period of two weeks or more, and
- A client’s cash on the location is insufficient to meet immediate needs and the client requires additional funds.
- The keyworker can only withdraw up to a limit of €100 per transaction per day with a maximum of €200 per week. Any amount over this limit must be approved in writing by the CSM/SSM.
- The written records to support this process must be stored as part of the client’s financial records.

**All transaction must be recorded daily. Where there is any change of location personnel (CSM, DCSM or keyworker), such changes MUST be reflected on all relevant client bank accounts. The signatory change documentation/request to update bank accounts MUST be sent to the relevant bank within 28 days of the personnel changes.**

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## 17.0 CSM responsibility

The CSM must review and reconcile all client money records in their location(s) each calendar month to ensure that these are accurate and comply with policy. This reconciliation must be carried out within 14 days of the end of each calendar month. This means that all records (including bank statement, receipts, and other supporting documentation) must be available and in a state of completeness for the purpose of this monthly review and reconciliation. CSM must document their monthly review by completing the review section in the client monthly cash and bank record sheet.

## 18.0 Difference or irregularities

Any difference/irregularity **MUST** be reported to the CSM or DCSM immediately.

Any difference/irregularity not resolved after 48 hours by the CSM/DCSM **MUST** then be reported immediately to the SSM.

Any difference/irregularity reported to SSM that remains unresolved with 72 hours of being reported **MUST** then be reported to the Financial Controller – the total period permitted to resolve any regularity is 3 working days (72 hours).

CSM's **MUST** comply with the HIQA 72-hour time limit to report such a notifiable event.

CSM's **MUST** comply with the Safeguarding 72-hour time limit to report financial abuse.

At any stage if the CSM report financial abuse or safeguarding re client money, they **MUST** immediately notify their SSM.

**If at any stage staff, DCSM's or CSM's have any concerns even where and irregularity has been resolved, they MUST seek advice from their SSM promptly – that is within 48 hours of being advised/becoming aware of any difference/irregularity.**

## 19.0 Access to 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 sanctioned in advance** by way of written approval from the relevant SSM. (Limit 1,500) Expenditure over €1,500 **must be sanctioned in advance** by way of written approval from the Financial Controller or the CEO.

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- Requests by family or other third parties for money or to access bank books must be cleared in advance through the Financial Controller or the CEO, who may in turn refer the matter to the Human Rights Committee. 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 Financial Controller or the CEO to obtain this form.
- Client money cannot be used to buy items which ought to be purchased by SHS. If staff have any queries or concerns, they must contact their SSM to receive written guidance. • Written records must be kept of all requests by family to make purchases for or on behalf of clients. Where any amount given to families for or on behalf of the client exceeds €50, receipts must be requested for the money spent.

## 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.

## 21.0 Maintenance of records

Bank books, statements, receipts, will, EPA's and all other physical records relating to client money and property must be maintained at the client's location and kept up to date. *Where possible such records must now be uploaded to CID following monthly sign-off by CSM.* Records must be kept in relation to discussions concerning wills, insurance, bank accounts or communication with families concerning client money. Such records must be available for inspection by internal or external auditors as necessary.

## 22.0 Client 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 on a cost neutral basis. CSMs will normally organise this but must seek prior written approval in advance by way of completion of a **Client Holiday Approval Form**. The process of approval will include the requirement for a letter of acknowledgement to be signed by the client, and where relevant the client's family/representative. The purpose of the letter of acknowledgement is to ensure that clients/families/representatives are aware of the cost of the holiday and that this awareness is documented in advance of final approval of the holiday. SHS staff salary costs

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cannot under any circumstances be charged to a client in the context of a holiday or trip. If a family has a concern with agreeing to a client going on a supported holiday, a client can be supported to access an independent advocate to resolve the matter.

### **23.0 Funds and property of Deceased Clients**

Funds or property of a deceased can only be passed to the client’s Legal Personal Representative for them to administer according to law. Staff must refer to the FC or CEO for guidance on this matter.

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