

# SUNBEAM HOUSE SERVICES POLICY DOCUMENT



Policy Name Client Money and Property Policy

Effective Date 18 April 2023

## Document Control

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1.0	Financial Controller	Review	All SHS
2.0	Financial Controller	Review and update	All SHS
3.0	Financial Controller	Review and update in conjunction with Audit Committee Mar '21	All SHS
4.0	Financial Controller	Amend process of recording/checking client bank transactions – use of bank statement as key record.	All SHS
5.0	Financial Controller	All reference to Community Managers removed and replaced with SSMs. 18.0 – Reference to Management of “Fraught” financial matters between stakeholders 10.0 – Reference to Complex Clients and determination of Will and Preference. 10.0 – Reference to Company Credit Care 6.2.1 – Clarification of whom a financial matter is referred to. 19.0 – Reference to Data Protection Officer Added	All SHS

## Policy Sign Off

CEO Name	CEO Signature	Date
John McCormack (Interim CEO)		18 April 2023

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## List of Abbreviations

Abbreviation	Meaning
CSM	Client Services Manager
SSM	Senior Services Manager
AON	Assessment of Needs (CID workflow)
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 (CID workflow)
CCB	Client Cash Book
EPA	Enduring Power of Attorney
PCD	Prepaid Debit Card
CCL	CSM Checklist – Client Cash & Bank
SCL	SSM Checklist – Client Cash & Bank

### 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 responsibilities are set out below. Non-adherence to this policy will be considered a serious non-performance issue.

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

## 4.0 General Conditions

- 4.1 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 clients 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.
- 4.2 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.
- 4.3 Staff have an ethical and professional duty of care to all clients. Therefore, staff must:
- 4.3.1 Treat client personal financial information and details of their finances with the strictest confidentiality.
  - 4.3.2 Exercise good judgement when supporting clients in how they spend their money (see also Savings & Investments below).
  - 4.3.3 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.
  - 4.3.4 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 or SHS Rent Policy.
  - 4.3.5 Maintain clear separation between client's money and organisational funds.
  - 4.3.6 Ensure clients are present, insofar as possible, when staff are handling their finances.
  - 4.3.7 Support clients to the greatest extent possible so that they are not subject to deception or pressure that affects their property or finances negatively.
  - 4.3.8 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 inappropriate spending of client money and record any such concern in line with the SHS's and mandatory reporting practices (see section 18 below).
  - 4.3.9 Ensure compliance with SHS Safeguarding Policy and HIQA Regulations & Notifications Timeframes (see section 18 below).
  - 4.3.10 Inform Gardaí where a theft is suspected or has occurred.

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- 4.3.11 All staff working with clients in locations must make themselves aware of the client's *Money Support Plan ("MSP")* on CID.
- 4.3.12 Ensure that accurate and up-to-date records are maintained in respect of client money and property.
- 4.3.13 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.
- 4.3.14 Staff must not, under any circumstances, borrow, take, or accept gifts of money or property from clients.
- 4.3.15 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.
- 4.3.16 Ensure where it is deemed clients require support from staff that where applicable and in line with the client's will and preference that safe storage of client monies (must be kept under lock and key) and valuables where these are under the care of staff/organisation's management.
- 4.3.17 Where clients are deemed to require more extensive support such as staff supporting the larger purchasing and or day to day spending, that up to date records and receipts are maintained by staff and local management. This level of support should be clearly outlined in the Money management assessment on CID.

## 5.0 Admission of a Client to the Service

- 5.1 On admission a '*Client Personal Property Log*' (CID Workflow) must be completed for all clients and approved 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. The Client Personal Property log is only relevant where a client is deemed to require support with their personal property. In cases where a client does not require support in relation to their property this should not be done.
- 5.2 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. The client's will and preference and also specifics of exactly what supports they need should be clearly outlined in the Money Management Assessment form.
- 5.3 Based on the '*Supports Needs Assessment*' and the '*Money Management Assessment Form*' ("*MMAF*"), an appropriate '*Money Support Plan*' ("*MSP*" Workflow CID) must be developed, agreed and approved by the CSM/DCSM. The 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

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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.

- 5.4 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' (Workflow CID) and the 'Money Support Plan' (Workflow-CID). 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 can be applied where it is decided that a client can manage their own money and property themselves with further training.
- 5.5 Where a client is deemed capable of managing their own money independently, this arrangement must be reassessed on an as required basis should the client's needs change. Each reassessment must be documented by way of an updated MMAF and MSP for that client. In instances where an existing client has acquired the necessary skills to manage their money independently, the arrangement must be reassessed every year or more often if required.
- 5.6 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 their SSM.
- 5.7 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). This is only applicable in cases where a client needs support to manage their valuables and property, the need to have a client personal property log should be included in the Money Management Assessment on CID.
  - 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 a least annually by the CSM in cases that this support is required for a client.
  - 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 form*' (CCB) recording is commenced immediately in the cases where the Money Management Assessment states this support is required. In cases where clients manage their only money this is not required.

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- 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' or 'Client in residential care' policy/procedure'. In cases where client wish to utilise other financial institutions in line with their will and preference this should be noted in their money management assessment and they should be support to continue to assess their preferred financial institution. .
- A *Client Contract of Care* must be issued to the client (within 28 days of admission).

## 6.0 Record Keeping and Security

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

- 6.1 Keep a clear record of all transactions relating to the client's money. (CCB/CCL/SCL)
- 6.2 All transactions must be signed by two staff except where '*lone working*' occurs.
- 6.3 Where '*lone working*' occurs then the staff member leaving a shift must balance the client's money and must sign and insert the date and time to certify the balance at the end of their shift.
- 6.4 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 discrepancies must be notified to the CSM/SSM immediately on discovery.
- 6.5 All entries made in a '*lone working*' setting must leave the second signature space for blank on a record.
- 6.6 A receipt must be provided for each cash transaction and each receipt must be recorded as a separate line item in the CCB (receipts are not to be aggregated).
- 6.7 Maintain, sign, and file receipts as necessary for all expenditure on behalf of a client.
- 6.8 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 (CCB).
- 6.9 Receipts or other supporting records must be stored safely and securely at the location. Appropriate envelopes or folders must be used for each month and for each separate client. Where a receipt is not available a "manual receipt" should be completed by staff to maintain a record of transactions and should be logged and stored in line with normal receipts. This should be signed, numbered and stored as per all receipts.
- 6.10 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. This receipt/record must be countersigned by the CSM within 14 working days.
- 6.11 Maintain records daily, ensuring all information is available for audit.

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- 6.12 Use the appropriate format and records as set down by SHS from time to time.
- 6.13 Any changes, or crossing-out of errors must be signed off by the CSM or DCSM and must remain legible. Crossing out of errors should be a simple line through the error.
- 6.14 Ensure that all client bank or cash records, debit or other cards or records are kept secure under lock and key, unless the client manages these themselves.
- 6.15 Ensure that clients' cash/cheque etc. are kept in the safe (please note a medicine cabinet will not suffice), unless the client manages this element of their financial affairs.
- 5.16 Keep client cash to the minimum.
- 6.16 CSM's must review and approve **all client bank accounts and cash records each calendar month** and within 14 days of the month end. The CSM must complete a CCB form and a CCL which must also be supported by a duly reviewed bank statement on which each entry has been checked, verified and signed-off.
- 6.18 It is best practice for Staff to seek to 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. Instances where a client does not wish to use a bank account, and wishes to avail of other financial institutions should be supported. The Money Management Assessment on CID should clearly outline the will and preference of the client in such cases.
- 6.19 Ensure any restrictions on a client's access to money or the use of their money is referred to the Human Rights Committee if required. If the client views does not view this as a "restriction" to their money, and rather as a support that they or their advocate are in agreement with, this should be simply logged comprehensively in their Money Management Assessment and a referral to the Human Rights Committee is not necessary.
- 6.20 Maintain confidentiality and compliance with Data Protection legislation regarding all client money and property records/information.
- 6.21 An SSM may refer a matter for review to the Financial Controller who will delegate a member of the financial staff team or other suitable person to review records at any time and may initiate an immediate review of any suspected policy breach that is detected or suspected.
- 6.22 In residential locations SSM's spot check must be planned so as to 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 in residential services are spot-checked over a two-year period.
- 6.23 In day service locations SSMs spot check must be planned so as to include the records of at least one-third 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 three-year period.

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- 6.24 SSMs spot check must include a check of all records, 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.
- 6.25 On a risk-assessed basis, SHS will carry out unannounced audits (using either internal or external reviewers).
- 6.26 Unannounced audits must include a check of all records, documentation and procedures detailed in the Client Money and Property Procedure.
- 6.27 All locations are required to have paper receipts / financial records where applicable in relation the money / property of clients (The arrangements as set down in the clients individual money management assessment outline what supports and consequently records are kept.) The relevant financial information to a given individual should be stored in a financial folder on site. Sunbeam House Services recommends that locations store Financial Documents / receipts on the CID system in the financial section, however it is at the discretion of the CSM and with agreement of the SSM if paper only storing of records is used in a given location.

## 7.0 Client Income

- 7.1 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 other forms of income to which a client is entitled. Where staff have any concerns, they must request advice from their CSM.
- 7.2 SHS will support clients to access all relevant Social Welfare entitlements and other supports. However, any outside assistance such as advocates, or solicitors will only be engaged with the Client's written agreement and at their expense. If clients are unable to give written agreement the CSM can support the construction of the written agreement.
- 7.3 As soon as practical, and at least within 28 days of admission, the CSM must ensure that the client's Social Welfare income is in place and the funds are accessible to the Client.
- 7.4 Where a Client is leaving SHS or moves to another service provider, the CSM must ensure that the new service is advised of the client's Social Welfare entitlements and that adequate arrangements are put in place to transfer the client's entitlements to the new service.
- 7.5 Where a client dies while in residential care with SHS, the CSM must ensure that all relevant Social Welfare claims are ceased/discontinued, the department of Social Welfare is informed immediately of the date of death of the client and that a follow-

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up email is sent to Department of Social Protection within seven days. The HSE and other relevant agencies must also be informed of the death of the client.

## 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 interests are protected and to ensure that the client's 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 only in cases where a client requires this support.

Where client money or property is returned to the client when s/he leaves the service(s), then two staff must sign for the return of cash, bank record/cards, and property, this only applies for clients whom are deemed to need this level of support as per the MMAF. The location CSM must record and review all Client money and property records on a monthly basis, as per this policy. This only applies to those clients whom require this support as outlined in the Money Management Assessment.

SSMs will complete a "spot Check" in respite services once per year, due to the nature of respite services SSM will only be required to check the documentation relevant to those clients whom are attending on the day of the check.

## 10.0 Bank Cards and Online 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 **'online'** or **'phone'** purchases/transactions using the client's main bank account/card are permitted if this is the clients wish, staff should support and fully document in the Money Management Assessment the exact will and preference of the client and how they will support transactions of this nature. If a client presents with complex needs and there will and preference cannot be determined in relation to "online or phone" transactions the will and preference of their advocate must be sought to obtain permission, failing the availability of an advocate the matter will be referred to the SSM. (See PCD's below). **'Cards on phones'** are not permitted under any circumstances for any client bank accounts, unless the client independently manages their financial affairs. This may present issues for staff and

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clients in that the client may wish to purchase goods or services online or by phone. Online transactions on behalf of clients can also be carried out by using **Sunbeam House Services Company Credit Card** or a using **Prepaid Debit Cards (PDC)**, set up in the name of the client.

***Staff are not permitted to carry out transactions on behalf of clients 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.

PDCs 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 all bank and/or cash including PDC's, 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 (MMAF & MSP) and they require either full or significant supports with money and bank accounts and or other financial accounts, then an 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:

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- Must be in the individual client’s name.
- Have a correspondence address for the location in which the individual receives their primary service to ensure that relevant staff (including the CSM) have access to statements and other correspondence from the bank.

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 financial controller as an **Exceptional Arrangement** (see below).

Where possible, 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 should encourage clients to 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, however their wishes will be supported.

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 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 is in place and a supporting training plan** must be signed by the relevant CSM and SSM. 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:
  - a. The client must change all PINs 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.

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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 'MSP '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 CSM and the written approval, in advance, of the financial controller. All exceptional arrangements 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. Fees and cost of such advice will be borne by the Client.

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 financial controller. Staff must not refer a client to a 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 making a will to the financial controller 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 financial controller. 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 EPAs to the financial controller 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.

## 16.0 Bank Accounts

The term 'bank account' includes savings, deposits, current accounts, prepaid debit cards and credit card accounts with all types of financial institutions including incorporeal banks and financial institutions.

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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 client's keyworker with the **following strict limitations**:

- A CSM/SSM can approve RSSMAC payments to an SHS bank account provided such payments are made in accordance with RSSMAC guidelines. This approval must be evidenced in writing and the written RSSMAC record(s) must be stored as part of the client's financial records. The housing department and or finance department can be consulted in relation to queries about RSSMAC payments
- A CSM/DCSM can make individual withdrawals/payments to **third parties (other than SHS)** up to a limit of €750 – all transactions must be compliant with this policy.
- An SSM can approve individual withdrawals/payments 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
- 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 €300 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 transactions 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.**

## 17.0 CSM Responsibility

The CSM must review 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 a bank statement, receipts, and other supporting documentation) must be available and in a state of completeness for the purpose of this monthly review. CSMs must document their monthly review by completing the CCL.

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## 18.0 Difference or Irregularities

Any difference/irregularity MUST be reported by staff 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 within 72 hours of being reported MUST then be reported to the Financial Controller/CEO – the total period permitted to resolve any irregularity 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 and the FC.

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

If financial matters became fraught on the part of one stakeholder or another, and impasse is present and cannot be resolved locally, the CSM and/or SSM will refer the matter to the Financial Controller who may at their discretion refer to independent mediation/decision making.

## 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.
- 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 Data Protection Officer for Data Protection consideration. 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.

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- Client money cannot be used to buy items which are covered by the service agreement between SHS and the client. However specific wishes in relation to the purchasing of items for themselves versus shared resource such as sitting room furniture or a shared television. If staff have any queries or concerns, they must contact their CSM 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, wills, 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. Sunbeam House Services recommends that locations store Financial Documents / receipts on the CID system in the financial section, however it is at the discretion of the CSM and with agreement of the SSM if paper only storing of records is used in a given location and CSMs are required to sign off the appropriate financial checks on a monthly basis.

As 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

SHS from time to time will support residential clients in relation to holidays, this 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 acknowledgment to be signed by the client, and where relevant the client's family/representative. The purpose of the letter of acknowledgment 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, should there be an issue to receive a written letter from a family / client CSMs can discuss same with families / clients and clearly record this discussion. This should be saved in the Client Financial Tab on CID.

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SHS staff salary costs **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.

Clients are however responsible to pay for the cost of the transport / accommodation for themselves and the staff supporting them on a holiday.

## 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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