

PROCEDURE Management of Clients' Funds in Community Living Services

1. PURPOSE

The purpose of this procedure is to ensure that where Senses Australia has responsibility for providing a client with assistance in managing their financial affairs that this is done in an honest, transparent and accountable manner and in the best interests of the client.

2. SCOPE

This procedure applies to all Senses Australia employees who are directly or indirectly responsible for providing a client assistance in managing their financial affairs.

3. DEFINITIONS

House

A house, flat or unit where a client or clients who are part of the Community Living Services, reside.

Supervisor

Refers to the regional area supervisor (or where they have been delegated this authority, a team leader).

4. PROCEDURAL DETAILS

All employees working with clients

Senses Australia recognises that there is a balance between providing assistance to the client to manage their own financial affairs as much as possible and protecting the rights of the client who can be extremely vulnerable to exploitation. Direct responsibility for the management of the client's financial transactions should be assumed by employees only in those areas unable to be managed by the client.

Assistance, when essential, should both promote autonomy, choice and enhance independence, and protect both the client and the employee. Employees assisting clients are in a privileged position of trust and need to be aware of the high degree of accountability they have to the client and to Senses Australia for the security and protection of the client's finances.

All employees are expected to demonstrate a high level of ethical conduct in both their duty to the client and to Senses Australia.

All employees are required to maintain absolute confidentiality in respect of client's funds and accounts. Any inquiries by third parties must be directed to either the Manager Community Living Services Metro or the Manager Regional Services.

All employees dealing with clients have a responsibility to bring to the attention of their manager if they consider that the client lacks the competence to manage their own financial affairs with some assistance from the direct support worker. In these cases, an application may be made to the State Administrative Tribunal for an administrator to be appointed. Senses Australia will not seek to be the administrator.

Client Consent

When Senses Australia will be providing a person with assistance in managing their financial affairs, a Client Consent to Handle Clients Monies Form must be completed before any management of client funds takes place. Once completed the form is filed in the individual client's file and a scanned copy of the form saved to the client's record in IRIS.

It is the responsibility of either the Manager Community Living Services Metro or the Manager Regional Services to ensure that the Client Consent to Handle Clients Monies form is completed.

Securing Clients' Funds

Disclosing a PIN

As a client who is managing their own financial affairs will use their signature to authorise transactions, they may also use a digital signature, a PIN or access codes, to use telephone banking, an ATM or online banking services. Employees may not use a client's PIN or other access codes when assisting a client to manage their finances.

When a client can't sign

When a client is unable to sign their signature, their funds will be managed by their administrator.

Employee Training

Training in this procedure, including training in completing the client's ledger books is essential for all employees working in community living services and is carried out at induction. Employees must complete this training before assisting a client with their financial affairs. Any additional in-house training requirements should be arranged with the Finance Department in advance.

Operating Rules for Employees

Employees must ensure that

- The client's funds are secured.
- Clients' funds are used only for the benefit of that client.
- Receipts are obtained for all items purchased when accompanying a client.

Employees must not

- make a personal purchase with money from any housekeeping or client accounts;
- borrow money from any housekeeping account or client;
- pay for any housekeeping or client expense with their own credit card or monies;
- use money from any housekeeping or client accounts to cover the cost of meals or entry into venues/entertainment for an employee;
- give clients investment advice;
- transfer petty cash between clients.

Meals

Employees may share, at no cost to themselves, in meals and other special occasions at a house if it is part of the clients' activities. Employees must pay for their own take away, fast food and restaurant meals purchased when accompanying clients.

Entertainment

The use of a companion card is encouraged to cover the cost of entry into venues/entertainment for an employee when the employee is accompanying clients as part of their individual plan.

Where a companion card is not available or accepted, the cost will be paid by Senses Australia. To arrange reimbursement, the employee forwards the receipt and a Request for Payment Form to their manager for approval.

An employee may not allow a client or their family to pay for the employee's entrance to any venues/entertainment. Please refer to the Gifts, Benefits, Loans and Grants to Staff and Volunteers and the Use of Family Members as Suppliers Procedure.

**Management of Clients' Personal Funds in the Community Living Services
Group Homes*****Physical Security***

All client funds are to be secured in a locked location together with the relevant ledgers/books of account. The keys to these monies must be handed over to employees on the next shift or kept in a secure location at the house as discussed with and agreed to by the supervisor.

All employees must check the balance in the client's petty cash at the commencement of the shift and sign/date records accordingly.

Any discrepancies are to be immediately brought to the attention of the supervisor.

Budgets

The supervisor in consultation with the direct support worker, assists the client to prepare a budget to ensure the responsible use of their money and to encourage saving for planned expenditure. The client's budget takes into account all regular income and household and personal expenses. The client's budget will determine the amount of funds transferred to the client's account and for their personal cash requirements.

For each house the Group Home Bookkeeper, in consultation with the supervisor, the clients and direct support workers, prepares a budget for each Housekeeping Account. The budget takes into account all regular and planned household expenses. The housekeeping budget will determine the regular monthly contribution required from each client.

The Group Home Bookkeeper will review the housekeeping budgets at the end of the financial year. Any changes necessary will be made once all clients have been made aware and have signed a new Direct Debit Form. If there are any changes to client numbers in a group home, then the budget must be reviewed again. Support workers are required to regularly review the adequacy of budgets and advise their supervisor where changes are required.

Client's Personal Funds

It is essential for clients to have ready access to funds which are used for the direct benefit of that client.

Purchases that are appropriate to be paid for from the client's personal funds include:

Housekeeping

A shared, equitable contribution to household expenses.

Personal property

Property for personal ownership (e.g. private TV or personal furniture).

Healthcare

Doctors, chemists, medication, dentists, chiropractors, incontinence wear, physiotherapists, masseurs, optometrists, specialists, dental and health insurance, and any other health expenses incurred by the client.

Clothing and Personal items

Personal items clothing, shoes, haircuts, toiletries and personal items.

Other

Holidays, outings, entertainment, transport costs, drinks and snacks away from home and gifts for family and friends.

Client's Cash

As previously stated, it is essential for clients to have ready access to their own cash to purchase personal items and for day to day expenses which are for the direct benefit of that client.

Clients usually withdraw cash from their individual passbook savings account for this purpose. If the client is unable to operate a passbook savings account, they may have funds withdrawn from their trust account or the Group Home Housekeeping Account if they have lodged personal funds into this account. In order to withdraw from their trust or the Group Home Housekeeping accounts, a Request for Funds Form needs to be completed.

Clients must be permitted to exercise their choice regarding how much assistance they need with their cash. Some will elect to retain control with minimal assistance whilst others rely on employees.

Operating Rules for employees

- The client's personal cash levels are to be maintained to ensure ready access to cash for personal expenses.
- Clients should be encouraged to plan for purchases and be discouraged from carrying large sums of cash.
- Support workers may assist clients to complete the withdrawal form for their bank account.
- Where possible a witness should be present for the handing over of personal cash.
- Employees are required to secure personal cash in a safe facility at the House.
- A ledger book must be maintained to record all cash issued and spent.

- There must be an invoice or receipt for all client cash expenditure.
- The ledger books must be reconciled daily by support workers, any discrepancies are to be reported to the supervisor.
- The Group Home Bookkeeper will carry out a monthly Audit on the recording of client personal funds.

Client Bank Accounts

Most community living services clients will have a personal passbook account. Payments made into this account may include pensions, a regular direct debit from a Trust Account held by Senses Australia, payments from the Public Trustee or from families. Withdrawals from this account may include payments or cash withdrawals to meet personal expenses.

Once again, clients must be permitted to exercise their choice regarding how much assistance they need with their bank accounts. Some will elect to retain control with minimal assistance whilst others rely on employees.

Operating Rules for employees

- Support workers are to keep safe the savings passbook of each client in the house.
- Support workers may assist clients with all transactions into and out of their savings account.
- All monies in a client's personal savings account must only be applied to the direct benefit of that person.

Unsupervised use of the Passbook Saving Account

When a client is not accompanied by an employee and goes on holidays or out on an excursion with their family or others, they should be discouraged from carrying large sums of money. If a client wishes to take their passbook on a holiday with them, their family, or the person in charge of the holiday, should be notified of this. The support worker must record the passbook balance immediately prior to the client leaving for the holiday or excursion and immediately the client returns.

Client's Accounts

When signing the Client Consent to Handle Clients Monies form, the client or their administrator may give authority for the Senses Australia to set up an account on behalf of the client.

The account will be in the name of "Senses Australia –[client's name]". It will be operated by the standard Senses Australia signatories.

All transfers and changes to the client's account must be authorised by the client or their administrator and recommended by the Manager Community Living Services

Metro. The Request for Funds Form and Client Financial Transaction Form must be used for this purpose.

Regular transfers of funds are to be arranged from the client's account for fortnightly rent, monthly housekeeping expenses and monthly transfers to the client's passbook for personal spending. Clients may also access funds for other expenses such their health insurance, annual holidays or one-off acquisitions.

Only where a client is unable to operate a passbook account for personal spending may cash withdrawals be permitted from the account.

The adequacy of these transfers, the client's budget and full details of each client's Trust Account are maintained and managed by the Manager Community Living Services Metro.

The Group Home Bookkeeper will complete the Group Home Audit of the management client's personal funds on a monthly basis and report any discrepancies to the supervisor and Manager Community Living Services Metro.

Housekeeping Funds

Each house has housekeeping funds to meet all shared household expenses. The amount of money needed in this account will differ between houses depending on the mix of clients and the usual rate of expenditure for a particular house. All clients must make equal contributions to the Housekeeping accounts.

Expenses that are appropriate to be purchased with the housekeeping monies include:

Food and groceries	The cost associated with the purchase of all foods and other domestic items, for the consumption of all clients in the household. Restaurant meals, fast food and home deliveries, where <u>all</u> clients participate.
Household bills	Telephone, water consumption, electricity, gas etc. Water rates are paid by either the owner of the property or Uniting Care West (who hold the head lease with the Department of Housing and Works).
Household items	Appliances, furniture or fittings required to create a homelike environment.
Cleaning and maintenance	Cleaning, lawn mowing, appliance repairs. Structural repairs are the responsibility of either the owner of the property or the Lessor of the property, unless they are non-safety related and are requested by the clients.

Housekeeping Cheque Account

The Housekeeping Cheque account is to be used for all shared household expenses.

The signatories to this account are to be preferably any two permanent residents of the house with any two to sign. Where this is not possible because of the cognitive ability of the clients, the next preference is that there is one permanent resident of the house and any one employee from the following group; the Chief Executive Officer, Executive Director Corporate Services, Executive Director Operations, Manager Community Living Services Metro, regional area supervisors, or a permanent support employee working in the house. Where no client in the house can be signatories, the signatories shall be any two employees from the aforementioned list.

A monthly credit is to be made into the Housekeeping Cheque Account on the first of the month from each of the clients in the house. The amount will vary and depend on the agreed budget for the particular home.

The Group Home Bookkeeper will do monthly checks that all clients have paid their contribution. If there are any discrepancies it will be documented during the audit.

Senses Group Home Corporate Credit Card

There will be a corporate credit card for each group home. This card is to be used for all appropriate housekeeping related expense. Employees may be required to use online shopping for purchasing shared grocery and other domestic items from major supermarkets. The Senses Group Home Corporate Credit Card must be used at all times for these purchases. The card usage must be restricted to Regional Area Supervisors, team leaders and support workers.

Operating Rules for employees

- The credit card must be secured in a locked location.
- Each time the card is used the credit card sign in/out form must be filled in.
- The credit card must only be accessible by the Regional Area Supervisor, direct support workers and team leaders.
- There must be an invoice/receipt obtained for every credit card transaction.
- All invoices and receipts are to be emailed to the Group Home Bookkeeper on a weekly basis.
- The Group Home Bookkeeper will carry out a weekly reconciliation on Group Home Corporate Credit Card.

Invoices for Group Homes

All appropriate invoices not paid by credit card must be made out to Senses Australia and emailed to the Group Home Bookkeeper for payment. These invoices

will be paid by Senses Australia. All invoices and credit card transactions will be recorded on the Senses Accounting System and recharged to the Group Home the same month.

Group Home Recharges (Monthly Bill)

The first week of a calendar month the Group Home Bookkeeper will reconcile all invoices that have been paid directly by Senses Australia on behalf of group homes. During this time all credit card transactions incurred by the group homes will also be reconciled.

An invoice will be raised to recharge the above to the group home. The Group Home Bookkeeper will raise a payment from the Group Home to pay the bill coming from Senses Australia. GST will only be applicable where there was GST paid on the invoice in the first instance.

Audit of this procedure

The Group Home Bookkeeper is responsible for carrying out a monthly audit of the management of clients' personal funds, the details of this audit can be seen in the Audit – Management of Client Personal/Housekeeping Funds Form.

The Group Home Bookkeeper will document any discrepancies found during the audit in a monthly audit report, which will be sent to the Manager Community Living Services Metro to review.

If training or disciplinary action is required as a result of the audit, the Executive Director Corporate Services may make a recommendation to the Executive Director Operations or the Chief Executive Officer.

Misappropriation of client's funds

Should any employee believe that there is any misappropriation of a client's funds by any person this must immediately be brought to the attention of either the Manager Community Living Services Metro or the Manager Regional Services and the Executive Director Corporate Services.

Reference Material

ACROD (now NDS) *WA Division Client Funds Manual* (January 2006)
Department of Health and Human Services (TAS) *Disability Services Management of Client Funds Guidelines* (signed May 2007)
Disability Services Commission (WA) *Accounting Manual* (November 2002)

Mack & Co *Review of Procedures for Management of Client Funds for Senses Australia* (December 2007)

5. RESPONSIBILITIES

It is the responsibility of each employee to ensure that they remain informed regarding Senses Australia procedures which impact upon their duties, and to work within them.

6. CONTINUOUS IMPROVEMENT

All Senses Australia employees are encouraged to provide feedback on this procedure to their supervisor, to ensure that it remains relevant and continues to reflect the actual manner in which activities are undertaken.

RELATED FORMS
FORM Audit – Management of Client Personal/Housekeeping Funds
FORM Authority Handling Clients' Monies
FORM Credit Card Sign In and Sign Out at Group Homes
FORM Declaration of Expenses
FORM Request for Funds
FORM Request for Payment or Reimbursement

RELATED QMS DOCUMENTS
PROCEDURE Duty of Care
PROCEDURE Code of Conduct
PROCEDURE Gifts, Benefits, Loans and Grants to Staff and Volunteers and use of Family Members as Suppliers of Goods
PROCEDURE Reimbursement for Work Related Expenses
PROCEDURE Responding to Abuse and Neglect of a Client

RELEVANT LEGISLATION AND STANDARDS
Nil.