



Support with Money Procedure

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Version Control

Date	Owner	Version	Reason for Change
May 2020	Nikki Fildes	6.0	New procedure template Cyclical review
January 2023	Neil Armstrong	7.0	Cyclical review
August 2024	Lesley McDonough	8.0	Provide emphasis on Quality Assurance processes

Summary of Changes

Section	Change
9.0	Provided more explicit detail as to how often Care and Support Managers should be auditing an audit. Included that the audit is on AIMS and that photographs of receipts are required to be legible.
11.2	Included how quality assurance processes will feed into the on-going review of this procedure.

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1.0 Introduction

Care & Support teams providing any level of support to a supported person in the management of their finances must refer to this procedure and its associated policy.

Providing support to people with their finances may amount to restraint and therefore Care & Support Managers (CSM)/Operations Managers (OM) must be clear that the support provided is an assessed need, with legal powers in place as required.

Ark must balance the right of an individual to manage their own finances as they see fit, with our responsibility to protect them from harm and abuse.

1.1 Relevant Policies and Procedures

This procedure is aligned with **CS05 Support with Money Policy**

It should be read and understood in conjunction with:

- G57a Adult Support & Protection
- CS02 Care Planning
- CS05b Trust Accounts and 'Access-to-funds'
- CS06 Reducing Restrictive Practice
- CS23a Quality Assurance (Care & Support)
- AM02 Tenant Alterations & Improvements
- AM01f Tenant Alterations & Improvements

2.0 General guidelines

Any support should be of the least restrictive method required and should aim to build on the individual's skills and abilities.

Care & Support staff must be familiar with the level of support the individual requires to manage their finance and understand their responsibility to keep the individual's financial information, financial items and money safe.

A 'financial transaction recording' sheet (**Appendix 1**) must be used to record all transactions that Care & Support staff members are involved in. This includes account withdrawals as well as any expenditure.

Care & Support staff will **never** receive financial payments from supported people. If Care & Support staff members have agreed to use their own car while supporting individuals, they will claim their expenses directly from Ark, see: **HR32 Expenses & Allowances**

Care & Support staff will **never** use their own credit/debit card to make a purchase on behalf of a supported person.

CSMs/OMs can implement additional specific protocols within their services or with specific individuals. These must be agreed with their Regional Manager and the multi-disciplinary team, including individual and family members, where applicable.

2.1 Financial transaction recording

All Care & Support staff members must follow these guidelines when supporting an individual with a transaction or completing one on their behalf.

- Check and record the balance in the cash box/safe before taking money out;
- Obtain a receipt for every transaction made with or on behalf of the individual;
- Record all transactions on the Financial Transaction Recording sheet on return to the service;
- Number each receipt and attach it to the Financial Transaction Recording sheet;
- Use a 'missing receipt' slip (**Appendix 2**) if a receipt was not available;
- Check and record the balance after completion of financial support;
- Check monies held in the cash box/safe matches the balance on the Financial Transaction Recording sheet;
- Report any discrepancies to the CSM/OM as soon as possible and complete an Incident Form;
- Ensure the cash box is stored securely, and keys are kept separately;
- If supporting an individual to make a bank withdrawal, obtain a mini-statement and attach to the recording sheet;
- Any cheques cashed for supported people that have In Trust accounts will be recorded on Cheque Recording Sheet (**Appendix 3**);
- Any withdrawals from and deposits to In Trust accounts since the last withdrawal must be documented on the Financial Transaction Recording sheet and the bank balance must reconcile with the previous amount documented considering deposits and withdrawals;
- Gift cards will be recorded on the Financial Transaction Recording sheet and spend, and balances will be monitored and checked by staff;
- Care & Support staff must sign every financial transaction they are involved in.

3.0 Consent

Ark can only provide support with finances if this is part of the support agreement and the supported person, or their legal representative has consented to this.

An individual can consent to this support unless they have been assessed as lacking capacity to manage their finances. Otherwise, a legal representative with relevant decision-making powers must consent on their behalf.

If an individual lacks capacity to manage their finances, Ark cannot provide this support without legal authority through one of the following:

- DWP/Social Security Scotland appointeeship
- 'Access-to-funds' through the Office of the Public Guardian
- Delegated authority from a financial guardian or continuing power of attorney. Note that a welfare guardian or attorney **cannot** consent to this on behalf of an individual.

If the Care & Support team is concerned that an individual is not able to manage their finances, they should seek advice from the social work care manager. This may be an Adult Support & Protection issue and could also require the individual to be assessed under the Adults with Incapacity (Scotland) Act 2000 to determine capacity.

3.1 Good Life Support Plan / Risk & Vulnerability

The supported person's ability to manage their own finances should be assessed through Good Life Support Plan / Risk & Vulnerability (R&V) documentation. It must cover if the individual is able to manage money, operate a bank account, pay bills and look after financial items (e.g. bank card, cheque book).

This assessment should be multi-disciplinary and therefore involve other relevant professionals, any legal guardian and family members where appropriate, as well as the individual.

If the individual requires any support with finances, risks must be detailed in the Good Life Support Plan / R&V, see: **CS02 Care Planning**

Good Life Support Plan / R&V documentation should detail the support the individual requires to manage their money in order to achieve their outcomes and minimise the risks identified. Note that supporting an individual with their finances may constitute restraint, see: **CS06 Reducing Restrictive Practice**. This should be considered in the Good Life Support Plan / R&V. Interventions should be the least restrictive method required to meet the individual's needs.

Any support provided with finances and plans in place should be reviewed at least every 6 months, as per the Good Life Support Plan review schedule. See **CS02 Care Planning**

A financial management plan may be created as part of the individual's Good Life Support Plan / R&V documentation if required. It should include:

- Breakdown of the individual's income;
- Breakdown of the individual's regular expenses – bills, shopping, and so forth;
- Cost of staff to attend activities & social events (entrance fees, refreshments);
- Details of any financial guardian / continuing power of attorney;
- Details of any appointeeship in place;
- Whether Ark has 'access-to-funds' via the Office of the Public Guardian;
- Details of types and level of support required with financial tasks;
- Bank account details;
- Details of support to increase skills and independence with financial tasks.

4.0 Bank accounts and capital savings

4.1 Bank accounts

Care & Support teams can support individuals to manage their current account(s).

If an individual has a savings account or an ISA, Care & Support teams will only provide support to manage these with the agreement of the relevant Regional Manager **and** with an arrangement in place with the bank to provide quarterly statements. The CSM/OM must ensure that the individual's family, financial or welfare guardian and social work care manager know these accounts exist.

Care & Support staff must **never** have access to the individual's PIN.

The individual must be able to use 'chip and PIN' debit cards independently. If the individual is unable to use this type of debit card, the letter from the bank containing the PIN should be destroyed unopened. Two Care & Support staff members must be present to destroy this. This must be assessed and recorded as part of the Good Life Support Plan / R&V.

Care & Support staff **will not** help supported people to remember their PIN. Supported people may instead use a 'chip and signature' card where available or will not be able to use a debit card.

Some supported people may have a bank or building society account that is operated by a passbook. These accounts do not issue debit cards. Should the individual wish to use a debit card, they will need to open a different bank account.

Any passbook, cheque book or other financial item that Ark holds on behalf of a supported person must be kept in a locked safe or cash box.

Ark may manage a trust account on behalf of an individual who lacks capacity to manage their financial affairs, see: **CS05b Trust Accounts and 'Access-to-funds'**

4.2 Capital savings

The Care & Support team must ensure that the individual continues to receive welfare benefit income. An individual's entitlement to means-tested welfare benefit is affected by their savings.

It is the responsibility of the CSM/OM to liaise with relevant multi-disciplinary partners and anyone holding financial decision-making powers to make purchasing decisions to avoid the breach of capital savings thresholds.

It is the responsibility of the CSM/OM to advise the relevant Ark Housing Services Officer if a supported person with an Ark tenancy is about to breach or has breached the capital savings threshold.

It is the responsibility of the CSM/OM to advise Department of Work and Pensions and/or Social Security Scotland if an individual is in breach of the capital savings threshold **and** Ark is the corporate appointee for that individual.

- a) If the individual is below pension-credit qualifying age and receives means-tested benefits, their entitlement will reduce if they have savings in excess of £6,000. Their entitlement will stop when their savings reach £10,000.
- b) If the individual lives in a care home, their entitlement will reduce if they have savings in excess of £10,000 and will stop at £16,000.
- c) If the individual lives in care home **and** receives Universal Credit, the thresholds are the same as (a) above.
- d) If a supported person is at/above pension-credit qualifying age, entitlement reduces from £10,000 although there is no fixed upper limit.
- e) If a supported person is at/above pension-credit qualifying age **and** receives Housing Benefit, entitlement reduces at £6,000 and stops at £16,000.

A member of the Housing & Customer Services team will email CSMs/OMs every year to advise of any changes to the above thresholds.

See the list of means-tested benefits here: <https://www.turn2us.org.uk/Jargon-buster/Means-tested-benefits>

See the pension-credit qualifying age checker here: <https://www.gov.uk/state-pension-age>

5.0 Income and expenditure

5.1 Income

The level of Care & Support staff's involvement in the individual's income must be recorded in their Good Life Support Plan / R&V and be of the minimum required to meet the individual's outcomes.

5.2 Money for daily/weekly needs

As part of setting the individual's personal outcomes, a daily or weekly amount of money that the individual needs should be agreed, if this is the level of support required.

Individuals who manage small amounts of money by themselves are not required to provide receipts for this to their Care & Support teams. This amount will be agreed and recorded on an individual basis through their Good Life Support Plan / R&V.

The multi-disciplinary team, including the individual and their Financial Guardian/Appointee, should be involved in setting a weekly budget that considers:

- food shopping;
- leisure and social activities;
- costs incurred by staff on leisure and social activities;
- travel expenses;
- bills;
- personal spending preferences; for example, clothes;
- savings;
- contributions to communal expenses;
- any other personal expenses.

An individual may keep money in a cash box/safe in their home to access daily/weekly money. An upper and lower limit of cash that can be stored in it must be agreed and recorded in the Good Life Support Plan / R&V. The supported person should hold a key to the safe or cash box wherever possible unless the individual does not have capacity to manage this. A finance transaction sheet must be in place if this is the case, and staff are required to access the cash box/safe.

When the balance falls to the lower limit, the individual or an account signatory will withdraw enough money to bring the float back to the maximum limit. The Care & Support

staff member must obtain a mini-statement when completing the transaction and record it appropriately.

If an individual needs to withdraw a larger amount of money than their usual daily/weekly spending in order to make a special purchase, this should be agreed with the CSM/OM and any financial guardian or financial power of attorney consulted. Written authorisation from the CSM/OM must be in place prior to any additional withdrawal of £100 or greater. A threshold of greater than £100 may be agreed if this limit is too low – agreement must be reached within the multi-disciplinary team, including financial guardians, and recorded in the individual's Good Life Support Plan / R&V.

Any monies held in the service office on behalf of a supported person for this reason must be checked and counted daily, by two Care & Support staff members where possible. This should be limited for insurance purposes and must be locked away safely with minimum staff access.

Large amounts of cash should be held in the cash box/safe for as little time as possible – withdrawals should be made as close to the date of use as possible.

5.3 Expenditure

If a supported person is paying for their Care & Support staff's food during social support, they will only pay for one course, and it will cost less than the individual's. If supporting someone to go out for a coffee, the supported person will only pay for the Care & Support staff member's drink (non-alcoholic). Any additional staff food/drink will be paid for by the staff. Any variance to this will be discussed and agreed in advance with a manager.

Regular payments, for example; utilities and rent should where possible be paid via standing order or direct debit to make it easier for supported people to budget, and to reduce risk. Only Care & Support staff authorised by their CSM/OM may set up a direct debit or standing order on behalf of the individual, and Ark must have legal authority to do so.

If the individual lacks capacity to manage direct debits and standing orders, these must be set-up by their financial guardian, unless Ark has authority to do so, see: **CS05b Trust Account and 'Access-to-funds'**. A financial guardian may delegate responsibility for direct debits/standing orders to Ark but they can still only be signed by the financial guardian.

Payment details must be recorded in the individual's Good Life Support Plan / R&V. It is the responsibility of the Care & Support team to ensure standing orders lasting a defined period end as scheduled.

5.4 Communal expenses

Any expenses that supported people contribute to (e.g. shared food or utilities) must be recorded in their Good Life Support Plan / R&V and a local protocol in place to record the collection and use of communal expenses.

Ark cannot be held responsible for communal monies that supported people are able to access.

Communal funds that Ark manages on behalf of a group of supported people must be stored securely at all times.

5.5 Loans and advances

Ark recognises there that there may be occasions where supported people are experiencing financial hardship however advice on what grants or funds may be available from the Government should be sought from the local Citizens Advice Bureau or local Job Centre. The Health and Social Care Partnership should also be informed as they may be able to offer some financial support.

Where a supported person is transitioning from residential care and not in full receipt of their benefit entitlement then Ark must not proceed with the transition until such times the supported person has appropriate funds. This will support a positive and effective transition.

There may be times where there is a delay in benefits being received, for example the supported person is deemed as not having capacity and an In Trust account is in the process of being set up or a change in benefit entitlement. The Appointee or Financial Guardian will support the individual to seek what grants or funds may be available from the Government by contacting the local Citizens Advice Bureau or local Job Centre. The Health and Social Care Partnership should also be informed as they may be able to offer some financial support.

In situations where Ark are responsible for the supported person's finances and staff have failed to offer the appropriate support to the supported person, the Regional Manager may authorise a small loan of up to £50 to a supported person from the service's petty-cash float. An example of where this may occur is if there was a bank holiday and not enough funds were withdrawn the previous week, failure to pay a utility bill and no agreement reached with the supplier to pay at a later date etc.

The reason for the loan will be recorded on the petty-cash transaction sheet **and** the supported person's financial transaction recording sheet, together with the date the loan will be repaid, this should be at the earliest opportunity. All entries must be signed by the Operations Manager on behalf of the Regional Manager plus 1 other member of staff.

Any amounts over £50 that may require an urgent online payment should be discussed with the Regional Manager and Finance Business Partner.

The example given above is a last resort solution and the only situation where a loan to a supported person will be permitted.

A supported person will **never** loan money to Care & Support staff.

6.0 Online/Over the phone shopping

If an individual has a debit card and wants to shop online or over the phone, or wishes to set up an online payment account (e.g. PayPal) Care & Support staff can support them with this on completion of the following:

- Any associated risks are recorded in the Good Life Support Plan / R&V;
- Support required to minimise risks are recorded in the Good Life Support Plan / R&V;
- A financial management plan, as part of a person's Good Life Support Plan / R&V, is in place, detailing the exact support required;
- Transactions are recorded on the 'online shopping recording' sheet (**Appendix 4**);
- The CSM/OM **must** be advised when the individual is being supported to buy goods online; this should be done by completing a Reporting to Manager form on AIMS;
- If an email address is required for online purchases the CSM email should be used.

Supported people with trust accounts do not have debit cards, see **CS05b Trust Accounts and 'Access-to-funds'**. In this circumstance, the individual's family member could buy the items and the individual pay them back. Alternatively, Care & Support staff could ask the vendor for an invoice and arrange a bank transfer. A giftcard could be purchased and used to purchase the goods. Otherwise, the Care & Support team should seek advice from their Ark Finance Business Partner.

The Care & Support team is responsible for ensuring the goods are received, and the individual's bank account and financial transaction recording sheets are checked to confirm the cost, and that any amount outstanding to Ark is repaid. Payments should be made to Ark as soon as possible after the purchase has been made. Failure to do so may result in a delay to future purchases. Receipts should be attached to the financial transaction recording sheet.

7.0 Shopping on behalf of supported people

A Care & Support staff member may shop on behalf of a supported person who is unable, due to, for example, illness. The 'personal shopping recording' sheet must be used (**Appendix 5**)

If this is likely to be a regular support need for the individual, then this must be detailed in the Good Life Support Plan / R&V.

If the individual lacks capacity, two Care & Support staff members must check the shopping and receipts, and both should sign the 'personal shopping' recording form.

If a Care & Support staff member has been shopping on behalf of a supported person, but the goods are not being given to the individual immediately (e.g. keeping for a birthday or special occasion) then two staff members must check the goods and receipt and sign the 'personal shopping' recording form. The goods must be checked and signed-for daily by two members of staff until the goods are given to the supported person. Any shopping done for this reason should be completed as close to the occasion as possible.

8.0 Handover procedure

A balance check of monies held should be completed at the start of every shift or handover of keys (where those keys enable access to a supported person's money). This should be recorded on the 'financial transaction recording' sheet.

9.0 Audit and discrepancies

All Care & Support staff must follow **G19 Quality Assurance** and **CS23a Quality Assurance (Care & Support)**.

Care & Support staff members are responsible for completing a weekly finance audit. This should audit all support provided to an individual with their finances. The audit document is on AIMS.

Staff completing the audit will ensure that receipts are legible when taking photographs to uploads to AIMS for the audit. In the event that receipts are not clear a physical copy of the receipt may be requested and should therefore be retained and stored securely.

Care and Support Managers or Operations Managers (where applicable) will be responsible for reviewing 25% of the audits received to ensure these have been completed accurately by the staff member. Each week different supported peoples finance audit should be

complete so in a 4-week period all supported people who receive support with managing their finances would have Manager sign off and overview at least once.

Where a discrepancy has been identified on the audit by the staff member the CSM/OM will complete a full audit of that audit. Focus should also be made where new staff are completing audits or there has been recent changes to the supported persons support around finances to ensure compliance.

Note that Care & Support teams should not be making detailed records of transactions the individual makes independently.

Recording errors will be addressed with individual staff by the CSM/OM and additional training may be provided as a result. Care & Support staff making consistent errors may be subject to disciplinary proceedings.

Discrepancies will be addressed by the CSM/OM with the Care & Support staff member.

Care & Support staff spending above the agreed budget will be considered a discrepancy.

The CSM/OM must be made aware of a high volume of 'missing receipts'. This will be subject to further investigation by the CSM/OM and may be considered a discrepancy.

Where supported people regularly access activities that do not provide receipts (e.g. a day centre), this must be recorded in the Good Life Support Plan / R&V.

10.0 Confidentiality & records retention

If a supported person has a financial guardian, the CSM/OM must make photocopies of all Financial Transaction Recording sheets. They must send the originals plus receipts to the financial guardian on an agreed, regular basis. Ark will keep the photocopies as per **G25 and G25a Records Management**.

Ark will keep all information relating to a supported person's finances in strict confidence, see: **G24 Privacy & Data Protection**.

Only current Ark paperwork relating to finances should be kept in the supported person's house, after use it should be moved archived appropriately, following **G25 and G25a Records Management**.

Note that supported people with capacity to manage their finances can choose to destroy financial documents when they choose, although Care & Support staff should ensure that they explain to people why financial records may be kept. Ark will not keep any financial

document belonging to a supported person unless this is required as part of our agreed support with finances.

11.0 Implementation and Review

11.1 Implementation

The Assistant Director – Care & Support has overall responsibility to ensure the implementation of these procedures by all Care & Support staff.

11.2 Review

Ark Regional Managers' group is responsible for the review of these procedures, at least every 3 years. Any changes to the associated procedure as a result must be submitted to the Policy & Procedure Review Group for approval.

Managers within Care and Support will continue to review health and Safety Quarterly reports and quality assurance processes to ensure this procedure and its associated policy is in line with best practice guidelines and regulatory requirements.