

Handling Resident Finances

If you need any information in a different format, for example large print, Braille, audio file or another language, please email

Communications@housing21.org.uk

Version number	5
Issue date	July 2024
Review date	July 2027
Board approval required?	No
If yes, date approved by Board	N/A
Author's name and job title	Angela Stringer, Care Quality and Standards Lead
Policy owner and job title	Sophia Nakhooda, Head of Strategic Projects and Business Improvement (Extra Care)
Policy Steering Group approval date	March 2024

Summary

Housing 21 is committed to supporting all residents to maintain independence with managing their finances for as long as possible. Housing 21 employees becoming involved with managing residents' finances will always be a last resort. This policy applies, in Extra Care, when a resident is unable to manage their own finances fully independently and may need support with some elements of day-to-day money management.

The policy must be applied whenever a resident is being supported with any aspect of their finances, planned or unplanned.

The aim of the procedure is to promote independence where possible and to safeguard residents where support is required in handling finances. In addition, the procedure sets out the processes which employees need to follow to ensure they are protected, and relevant legislation is applied where appropriate.

The procedure sets out:

- What is required to be documented within the resident's support plan
- When to carry out a risk assessment in connection with managing resident's finances
- Where we would and would not get involved in supporting with handling finances
- The relevant documentation that needs to be completed to ensure good record keeping, and to safeguard residents and employees
- Alternative support available and when it may be appropriate to signpost
- Who should have access to what information and how it should be kept safe

All employees are expected to comply with this policy and procedure: it will be applied fairly and consistently to all residents. Failure to comply with this policy may result in formal disciplinary action being taken.

Equality, Diversity and Inclusion

Housing 21 aspires to embed diversity and inclusion within all our organisational activities to enable these principles to become part of our everyday processes.

Contents

1.0 Assessing support needs	3
2.0 Shopping calls	3
3.0 Discount/Loyalty cards	4
4.0 Cash handling including the use of safes	4
5.0 Access to and use of Bank Cards and Personal Identification Numbers (PIN)	5
6.0 Other Support Available	6
7.0 Audit Process	7
8.0 Process to follow, after the death of a resident	8
9.0 Training	8
10.0 Confidentiality	8
11.0 Links to other policies and legislative context	9
12.0 Dissemination of the Policy and Procedure	9
13.0 Ensuring compliance with the Policy	9
14.0 Abbreviations	10
15.0 Appendix – How to complete a Financial Transaction Form	11

1.0 Assessing Support Needs

1.1 If a resident is fully independent with managing their finances, then a risk assessment is not required.

- 1.2 Where Housing 21 employees are involved with any element of supporting a resident with their finances i.e. shopping calls, then a financial risk assessment must be completed on Birdie.
- 1.3 If a resident requires support with shopping or managing finances, then this must be documented within the relevant section of the care plan.
- 1.4 All arrangements must be discussed and agreed with the resident and their family or local authority social worker.
- 1.5 The care plan should include details of exactly what the resident requires support with and how money is made secure.
- 1.6 Any action taken, or support required because of the risk assessment must be included within the care plan.
- 1.7 If the risk assessment results in a medium to high risk score and there is concern that a resident lacks the capacity to understand management of money, please refer to the [Mental Capacity Act Policy](#).
- 1.8 Risk assessments must be reviewed every 6 months, in line with the care plan, or sooner if there are any changes to the support provided or concerns of a lack of capacity.

2.0 Shopping Calls

- 2.1 Wherever possible a resident should be encouraged to maintain independence where an escort is provided for shopping calls by making payments for items purchased themselves.
- 2.2 In the event that a resident is unable to physically go out to collect shopping, or where a resident is unable to understand the value of notes and coins, and therefore an employee is required to hand money over to a cashier, then a Financial Transaction Form must be completed. These are available to be ordered via your Regional Administrator.

2.3 Shopping calls must only be carried out by a member of the care team, and only in exceptional circumstances would a domestic employee be permitted to carry this out. For example, if lift(s) breakdown meaning that residents who are usually independent are unable to get out to collect their own shopping. The normal procedures must apply including a manager auditing the Financial Transaction Form.

2.4 The financial transaction form safeguards both residents and employees by providing clear evidence of what has been spent and the reasons why. Instructions for how to complete a Financial Transaction Form can be found at Appendix one.

2.5 Receipts for purchases made should always be provided, with a copy uploaded as an image to the visit notes in Birdie and the original given to the resident. If no receipt is available this must be reported to the ACM on duty and the reason why documented on the Financial Transaction Form. A photo of the completed Financial Transaction Form must be added as an image to the shopping visit notes on Birdie for auditing purposes. The original Financial Transaction Form(s) can be given to the resident with any shop receipts.

2.6 Employees must only use cash provided by the resident, to make any shopping purchases. Under no circumstances should purchases be made by employees using a resident's debit or credit card, including the use of 'contactless' payments.

2.7 During shopping calls employees are not permitted to carry out any personal shopping tasks.

2.8 Online shopping is a good alternative which may support residents to remain independent, where this is used the resident must be able to enter their own debit or credit card details where required.

2.9 Employees must not use their own email address or details to set up online accounts on behalf of a resident. All online accounts must be set up using the residents own email address and the password must never be shared with employees.

3.0 Discount / Loyalty Cards

3.1 Employees must never use their personal loyalty cards (i.e. Tesco Clubcard, Nectar Card, Boots Card etc.) to collect points on a resident's purchase.

3.2 Loyalty cards used must be in the name of the resident only, no other person should benefit financially or in any other way.

3.3 Purchases of 'Buy One Get One Free' offers should be in line with the resident's needs and remain the property of the resident. Under no circumstances should an employee keep the 'free' item.

4.0 Cash Handling including the use of safes

4.1 In some circumstances Housing 21 employees may be required to support a resident with day-to-day cash handling, for example where a resident is unable to understand the value of notes and coins. This support should only be implemented as a last resort and should be agreed by the Housing and Care Manager (HCM)/Care Manager after considering all possible alternatives.

4.2 Any money must be kept securely within the resident's apartment within a safe, and it is the responsibility of the resident to provide or purchase the safe. The money must not be kept within the court safe or within any of the scheme offices.

4.3 Only Housing 21 employees may have access to the safe and access should be limited to Assistant Court Managers (ACM's) and HCM's/CM's.

4.4 A Resident Cash Handling Record must be kept within the safe at all times and completed whenever money is deposited within the safe by employees or money taken out to give to the resident and must be accompanied by two employee signatures, one of which should be the ACM or HCM/CM who accessed the safe.

4.5 If family members provide money for a resident, this must be given to the care office where a receipt must be provided to the family member. An ACM or HCM/CM is then responsible for depositing the money into the resident's safe, recording it on the resident cash handling record and attaching a copy of the receipt. Family members must not have access to the safe to safeguard our employees.

4.6 Where a Lasting Power of Attorney (LPA) for property and financial affairs asks to see the records for the safe, this can be made available by providing them with a copy of the resident cash handling record.

4.7 If a resident lacks the capacity to consent to their money being kept in a locked safe, please refer to the Mental Capacity Act Policy.

4.8 Money kept within the safe must be limited to £500. When ACM's or HCM/CM are accepting a deposit from a relative or friend they must check that the deposit would not take the total amount above the threshold. Any insurance claims will be dealt with through the resident's content insurance.

5.0 Access to and use of Bank Cards and Personal Identification Numbers (PIN)

5.1 Residents must be supported to remain independent when managing their bank account, if a resident may struggle to remember a PIN, they can be supported to change their account over to one which allows withdrawal in person using a bank book, signature and identification.

5.2 Where employees escort residents to withdraw money from a bank, ATM/cash machine or post office using a debit card and PIN, this transaction must be carried out only by the resident.

5.3 In the event that a resident is unable to understand the process of managing their bank account or withdrawing money, and they do not have a Lasting Power of Attorney (LPA) for property and financial affairs in place, please refer to the Mental Capacity Act Policy. See also 6.0 - Other Support Available.

5.4 Employees must never use a resident's debit or credit card and PIN number to make purchases, withdraw cash or collect pension monies.

5.5 It is accepted that support in the use of a PIN may be required in exceptional circumstances, but this should be avoided wherever possible. Support in the use of a PIN may be authorised, if not doing so, would leave the resident in serious financial hardship and unable to purchase necessities i.e., food.

5.6 Authorisation and Use of PIN Process

5.6.1 Only once all other options have been exhausted i.e., support from family, food banks, food provision from restaurant on site, safeguarding raised with the Local Authority (LA), can authorisation be sought from the regional Head of Extra Care.

5.6.2 Evidence of the actions taken to date and steps put in place to mitigate any risk must be provided to the Head of Extra Care for consideration and authorisation.

5.6.3 Where granted, authorisation is for one withdrawal of money only, until the LA or Department for Work and Pensions can put in place more permanent measures. The LA must be notified of the intention of the withdrawal as part of safeguarding procedures.

5.6.4 The withdrawal must take place with the resident present wherever possible, and two employees present, one of whom must be the registered manager of the service.

5.6.5 A mini statement must be obtained before and after the withdrawal, and kept alongside a receipt for the withdrawal, copies of each should be kept on the resident's file.

5.6.6 Following the withdrawal any records of the PIN must be destroyed.

5.6.7 Under no circumstances should the PIN be shared with any other employees.

5.6.8 Once the withdrawal has been made the residents PIN must be changed to protect both the resident and employees, so that no employees have access to the new PIN.

6.0 Other Support Available

6.1 Pre-payment cards

6.1.1 In some circumstances the LA may support a resident to manage their finances by providing a pre-payment card. It may be agreed as part of the resident's care plan that Housing 21 employees support the resident to use the pre-payment card to withdraw cash.

Where this is in place, access to the pre-payment card must be limited to a defined group of employees and this should be documented within the care plan and Financial Risk Assessment on Birdie . Clear records of the use of the pre-payment card using the Resident Cash Handling Record must be kept along with copies of receipts, these must be made available to the LA as part of audit processes. Unless otherwise agreed with the LA the pre-payment card must be kept within the resident's apartment and always made accessible to them.

6.2 Powers of Attorney (LPA's/EPA's)

6.2.1 Residents may have in place an Enduring Power of Attorney (EPA) or Lasting Power of Attorney (LPA) for property and financial affairs. Employees should ask for evidence of this, and copies placed in the resident's document section on Birdie, the care plan should also reflect this.

6.2.3 Any EPAs or LPAs should be involved in any decisions regarding the handling of resident's finances, and a resident does not have to lack capacity for an LPA for property and financial affairs to come into effect. Further information is provided within the Mental Capacity Act Policy.

6.3 Appointees

6.3.1 If a person is assessed as lacking the capacity to manage their money, the DWP can appoint someone to take responsibility for managing this income. This person is called an appointee.

6.3.2 An appointee is someone appointed by a court of law or government department who is given the legal right to act on someone else's behalf. Appointeeship relates solely to benefits and does not relate to any other money or property the person may have.

6.3.4 Evidence of appointeeship should be requested, recorded within the support plan and a copy kept on file.

6.4 Deputies for Property and Affairs

6.4.1 Deputies are appointed by the Court of Protection (COP) to manage the property and affairs and/or personal welfare of a person who lacks capacity to make certain decisions. A family member or friend can apply to the COP to act as a deputy.

6.4.2 If there are no friends or family members who are willing and able to take on the role the court can appoint either the (LA) or a solicitor to act as deputy. If you think a resident may need a deputy, you should contact the LA for advice and support.

6.4.3 If there are concerns that an LPA/EPA, appointee or deputy is not providing the resident with enough money, and this is therefore creating financial hardship, please refer to Housing 21 Safeguarding Policy and the LA's safeguarding policy.

7.0 Audit Process

7.1 Details of which residents receive support with their finances can be found on Birdie. This information must be referred to, to ensure the audit process covers all necessary documents.

7.2 The HCM/CM should audit all Cash Handling Records monthly against the contents of the safe, with another member of employees present.

7.3 Any concerns or discrepancies found should be recorded on the Managers Monthly Financial Audit Record for that resident and appropriately investigated by the HCM/CM.

7.4 Concerns of theft or fraud should be reported to the police and raised with the LA safeguarding team. Where appropriate the concern should also be reported to the LPA for property and financial affairs or the next of kin. HCM/CM must refer to their local authorities safeguarding policy and Housing 21's Safeguarding Policy.

7.5 Any concerns involving Housing 21 employees should be reported to the People Services Team who will provide advice on a case-by-case basis. In addition, you can refer to the Disciplinary Policy.

8.0 Process to follow after the death of a resident

8.1 In the event of the death of a resident, who has been in receipt of support for cash handling, who has no Will in place and no known next of kin, or the next of kin abdicate responsibility, please refer to the Death Intestate Policy for guidance.

9.0 Training

9.1 Care employees will be trained in the use of Financial Transaction Forms, and the importance of supporting residents to maintain independence with managing finances as part of the face-to-face Reporting and Documentation session on induction, this will also be built into a three-year refresher period.

9.2 Management employees will be required to brief new starters on the policy and procedure as part of their Induction Toolkit.

10.0 Confidentiality

10.1 Employees should only have access to financial information that is relevant to the support provided to the resident.

10.2 Financial information should never be shared via any means including but not limited to on the telephone, via email or through social media.

10.3 Any loss of financial information should be reported to the HCM/CM, who should then report it to the Governance and Compliance Manager, as per the Security Incident Event Management (SIEM) procedure. The SIEM, is the 'Security Incident Event Management' form and is required to be completed if there has been any breach, incident or event leading to the loss or theft of personal data. This form should be sent to the Information Governance Manager and Data Protection Officer (DPO) as soon as a breach of personal data is recognised. This is because to determine if the breach is ICO reportable and an investigation findings report is required to be submitted to the ICO within 72 hours of the DPO being notified of the breach. Any technical data breaches should be alerted to the IT Security Manager or IT Service Desk, to mitigate further loss and risk to the business, who will then alert the DPO, again the SIEM should be completed.

10.4 Personal data will be managed and processed in accordance with Housing 21 Data Protection and Information Security Policies and Procedures.

11.0 Links to other policies and legislative context

11.1 There is a link between some legislation, procedures and guidance, which may mean you need to follow more than one process at the same time. Please refer to the list below:

[Housing 21 Safeguarding Policy](#)

[Housing 21 Mental Capacity Policy](#)

[Housing 21 Disciplinary Policy](#)

[CQC Guidance](#)

[SCIE Guidance](#)

12.0 Dissemination of the Policy and Procedure

12.1 Compliance with the Handling Resident's Finances Policy and Procedure is mandatory for all employees, or agency workers representing Housing 21. All employees therefore have instant access to the policy on a 24/7 basis and are trained accordingly to ensure a developed understanding of the policy.

12.2 The policy will be located on the intranet, alongside a PowerPoint presentation to be used by managers to support a standardised roll out within operations alongside discussion in management meetings and other internal communications.

13.0 Ensuring compliance with the Policy

13.1 HCM/CM are responsible for making sure that this policy is understood by all employees and is being applied within their services.

13.2 RECMs are responsible for testing the application of this procedure when carrying out Care Quality Review visits to their schemes. Any deviation from this procedure must be acted on immediately and actions put in place to achieve compliance with the policy.

13.3 The Internal Audit team are considered as the 'last line of defence' and will test the application of this policy in routine, operational audits.

14.0 Abbreviations

LPA – Lasting Power of Attorney
EPA – Enduring Power of Attorney
LA – Local Authority
RECM – Regional Extra Care Manager
HCM – Housing and Care Manager
ACM – Assistant Care Manager
CM – Care Manager
COP – Court of Protection
DWP – Department of Work and Pensions

15.0 Appendix

Appendix One

How to complete a Financial Transaction Form

1. Whenever a member of employees supports a resident to collect shopping and is required to support with physically handling the money a Financial Transaction Form must be completed.
2. **Examples include**; where a resident is unable to physically go out to the shops and a employees member goes on their behalf; or when a resident is present during the shopping call but is unable to understand the value of notes and coins and so requires the care worker to hand over the money to the cashier, and check the change received.
3. The top sections of the form including name, address etc. and **Part 1** must be completed before leaving the court to complete the shopping call.
4. There must always be **two** signatures to confirm the amount of money received from the resident; one to be the employees member receiving the money and the second the resident. In the event that a resident is unable to sign there must be a second employees signature and in the first instance this should always be an ACM or Manager.
5. The third copy of the form, **the yellow coloured page**, should then be given to the resident as a receipt for the money received.

6. During the shopping call receipts must be obtained for all purchases.
7. On return from the shopping call **Part Two** must be completed to confirm the total amount of money spent and the total amount of change given back to the resident.
8. There must always be **two** signatures to confirm the amount of change given to the resident; one to be the employees member who completed the shopping call and the second the resident. In the event that a resident is unable to sign there must be a second employees signature and in the first instance this should always be an ACM or Manager.
9. A photo of the completed form and any receipts should be taken and added to the visit notes on Birdie. The form should then be given to the resident for their records.