



Acacium Group Community Administration and Management of the Service User's Finances

Policy Reference | ORG 18

Version | V2.0

Policy Name	Administration and Management of the Service User's Finances
Purpose of Document	To ensure that there is a systematic approach in the administration and management of the Service user's finances in the community setting
Target Audience	All workers
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Risk And Resource Implications	N/A
Associated Strategies and SOPs	Anti-bribery policy Safeguarding Adults Policy on Policies
Equality Impact Assessment (EIA) Form	Acacium Group is committed to Equality, Diversity and Inclusion and in line with our values, we strive to ensure that everyone that is part of the Acacium community is not disadvantaged or discriminated against given their individual need or characteristics. To support this, an Equality Impact Assessment has been undertaken on this policy/procedure. This information is held centrally and can be requested from the Clinical Governance Team.
About Acacium Group	Details of all Acacium Group trading companies that this policy applies to are detailed within Appendix A
Legislation	Legislation and Guidance pertinent to this policy can be found within Appendix B

Document History			
Version	Date	Changes made/comments	By whom
V1	Oct 2015	Annual Review	SJ/KNF
V1	Jul 2016	Mid-year review/update	KNF/SJ
V1	Oct 2016	Annual Review	KNF/VM
V1	Nov 2016	Transfer to TNS	KNF SJ
V1	Oct 2017	Annual Review	KMS/SJ
V1	Feb 2018	Updated front sheet to include new review frequency date. Added new EIA Form	KMS/MS
V1	Oct 2015	Annual Review	SJ/KNF
V1	Jul 2016	Mid-year review/update	KNF/SJ
V1	Oct 2016	Annual Review	KNF/VM
V1.1	Mar 2020	Update to new Community Policy	CCR/CC
V1.2	Oct 2020	Update re Rebrand	CC
V1.3	Oct 2021	Review	CAG
V2.0	Jan 2024	Rebrand	Clinical Advisory Group

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1. Introduction

- 1.1 Acacium Group believes that every aspect of care required by a Service user should be addressed. Safeguarding their financial interests and protecting them against potential financial abuse is part of their care.
- 1.2 Acacium Group follows national guidelines and legislation to ensure that the processes in place protect both the Service user and Acacium Group workers.
- 1.3 Acacium Group will ensure that any assistance with Service user's money provided by Acacium Group workers is conducted in an honest and transparent way.
- 1.4 Acacium Group recognise, there may be several scenario's in which Acacium Group workers may be required to manage or assist in the management of a Service user's finances:
- Service user has capacity, but requires assistance with inputting the card and pin number or using the card by contactless means
 - Service user has capacity, but requires Acacium Group workers to take cash/card and purchase goods
 - Service user may or may not have capacity but requires Acacium Group workers to countersign cheques
 - Service user lacks capacity and Acacium Group manages their bank account/cards and or cash
 - Service user may or may not have capacity but requires Acacium Group workers to pay bills
 - Service user may or may not have capacity but requires staff to sign for services on their behalf (i.e. electricity).
- 1.5 Acacium Group recognises that managing the finances of a Service user can be challenging to monitor and administer and the outcomes are heavily dependent on trust and good communication between the Service user, Acacium Group worker and Acacium Group.

2. Definitions

- 2.1 Definitions relevant to this policy are set out in the table below.

Definition	Explanation
Financial abuse	The No secrets definition of financial abuse is: 'financial or material abuse, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits' (DH 2000).
UKHCA	United Kingdom Home Care Association Limited: Provide guidance and a code of practice for domiciliary care.
FSA	Financial Services Authority: Regulator of all providers of financial services in the UK.
Service user	The person that the organisation is providing a care package for within the home setting.
Financial Transaction	A financial transaction is an agreement, communication or movement carried out between a buyer and a seller to exchange an asset for payment. It involves a change in the status of the finances of two or more businesses or individuals.

Acacium Group workers	Qualified nurses and HCSW workers, working in care packages for Service users within the home setting.
Equal Opportunities	<p>The organisation is committed to ensuring equality of learning opportunity and no employee will be excluded from learning on the grounds of:</p> <ul style="list-style-type: none"> • Gender, including gender reassignment • Age • Marital status • Disability • Racial grounds i.e. race, colour, nationality – including citizenship - ethnic or national origin • Sexual orientation • Religion or belief • Responsibility for dependants • Trade union membership or employment status. • Pregnancy and maternity <p>Part time and fixed term staff will have equal access to learning and development opportunities appropriate to their roles and responsibilities and given access to relevant training.</p>

3. Roles & Responsibilities

3.1 The general overall organisational roles and responsibilities are set out in the policy document, CORP10 Policy on Policies

3.2 The following table outlines the responsibilities of the key people involved in this policy.

Job Title	Responsibilities
Global Clinical Director/Group Chief Nurses	Responsible for ensuring that all policies, standard operating procedures (SOPs), protocols, training, and competencies, are in place to support the Pulse nurse or care in the safe delivery of safe and effective care provision.
Clinical Advisory Group	Ensure that this policy is relevant and up to date. Ensure that this policy is reviewed on a regular basis.
Line Managers/ appropriate others	<p>Is operationally responsible for ensuring compliance with this policy within their area of responsibility. This includes ensuring, where appropriate, that sound training re: financial management is a feature of all commissioned services/packages, promoting good training practice within their own teams, ensuring that training needs are identified and documented in accordance with this strategy and ensuring that all staff are made aware of risks within their work environment and of their personal responsibilities, including compliance with Acacium Group policies.</p> <p>The Safeguarding Vulnerable Groups Act (2006) the roles and responsibilities:</p> <ul style="list-style-type: none"> • Respect an individual's right to control their finances and personal property • Handle an individual's finances and valuables appropriately, in accordance with legislation, regulations and guidance • Ensures confidentiality at all times

	Minimise the risk of criminal activity or financial abuse.
Individual members of staff	<p>To be aware of their responsibilities with regards to finance management for the Service user.</p> <p>To be aware of how to safeguard vulnerable adults from financial abuse</p> <p>To be aware of how to safeguard themselves against allegations of financial abuse by following procedure.</p> <p>To be aware of responsibilities with regards to the mandatory Safeguarding training and working to current practice guidelines</p> <p>The Safeguarding vulnerable groups Act (2006) identifies the roles and responsibilities as:</p> <ul style="list-style-type: none"> • Must protect the rights and promote the interests of the service user • Must promote independence of service user's while protecting them as far as possible from danger or harm • The worker must have no personal interest or benefit from any of the financial transactions of the individuals they support • The worker should not take on legal roles in respect of the service user because the possible conflict of interests • The worker should not benefit from any financial transaction carried out by or on behalf of the service user • The worker has a responsibility to report any concerns about potential financial abuse • The worker must maintain a financial transaction record
Clinical Advisory Group (CAG)	Review policies and clinical documents for the Group in order to safeguard and improve quality in line with the Groups vision, strategic aims and in a context in which diversity is recognised and widely celebrated

4. Acacium Group's Approach to Administration and Management of the service user's finances

- 4.1 The UKHCA suggest that all Service users should be encouraged to manage their own finances independently or with the assistance of a relative or close friend. "The type and level of assistance provided should be proportionate to the needs and capabilities of the individual. Independence should be maintained or increased wherever possible, although it is recognised that some vulnerable adults assisted to live at home will not always have the mental capacity to make financial decisions or arrangements for themselves" The Mental Capacity Act (2005). . Therefore, there needs to be robust processes in place to ensure the safety of the Service user, the Acacium Group worker, and Acacium Group.
- 4.2 Acacium Group must only enter into the financial management for a service user if this has been agreed with the commissioner of the package and is detailed in the contract and Service Level Agreement (SLA) or Client Service Specification (CSS) When a Service user is assessed, their ability to manage their own finances should be part of their assessment and will be fully discussed with the Service user, relatives, Social Services, Commissioners of service , and GP where appropriate. Any changes to the Service user's ability or personal circumstances that may affect their ability to manage their own finances MUST be reported to Acacium Group as soon as possible.

- 4.3 The Service user should retain effective control of their money in all cases unless it is explicitly stated that they require assistance. All agreements to provide financial assistance for a Service user will be documented in the care plan.
- 4.4 Financial Transaction Form: Every time a Acacium Group worker handles a Service user's monies, a Financial Transaction Form must be completed and receipts retained. Please see example of form in Appendix D.
- 4.5 Please see below for guidance of the use of the Financial Transaction Form. The Financial Transaction form is subject to audit along with other service user care documentation:
- **The Use of the Financial Transactional Form**
 The form must be completed, signed and dated by both the Acacium Group worker and the service user to confirm receipt of monies. (If the service user is unable to confirm receipt of monies then a family member or second Acacium Group worker is required to confirm with permission from Acacium Group)
 - This form must include a clear record of the amount and nature of the transaction
 - The Acacium Group worker should provide receipts for all financial transactions where ever possible
 - Upon completion of the transaction the Financial transaction form should be completed by both the Acacium Group worker and the Service user to confirm that any change has been given and a receipt provided
 - A copy of this form should be sent to the relevant Acacium Group location by the Acacium Group Worker
 - A copy should be available for the service user or relatives to check as appropriate
- 4.6 The Acacium Group worker should record details of the financial transaction in the record of events sheet on the day that the transaction occurs.
- 4.7 Service users should be encouraged to keep money and other valuables in a secure place at all times.
- 4.8 Risk Assessment: When it has been identified that a Service user requires assistance with financial management, the risk assessment must be adapted to document the needs of the individual Service user.
- 4.9 Safety and Security for Acacium Group workers: The UKHCA make recommendations regarding best practice to safeguard workers:
- If workers visit banks and post offices regularly with Service user's money, they should change the routes, days and times if possible
 - Workers must check amounts collected for Service users before leaving the bank/post office
 - Workers must check that the correct change is given for purchases prior to leaving any shop
 - Assigned name key individuals who hold the PIN number for any bank cards and any on-line account passwords.
- 4.10 Acacium Group workers are not permitted:
- To sell goods or services to the Service user
 - To gain personally from Catalogue purchases and the sale of other items
 - To gain personally from supermarket special offers, i.e. 2 for 1 or loyalty points/cards schemes, air miles etc
 - To involve the Service users in gambling or football pools syndicates
 - To purchase a lottery ticket or the placing of bets on behalf of the Service user

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- To carry money, cheques, cards or pension books ‘to settle up next time’
- To conduct their own shopping or other personal financial activities at the same time as undertaking a Service user’s transaction

4.11 Acacium Group workers should:

- Act with the highest standard of care, honesty and integrity whenever handling a Service user’s money
- Respect the right of the Service user to spend their own money as they wish to and to keep their own financial affairs private
- Uphold the confidentiality of the financial affairs of the Service user
- Only spend, use, carry, transport or invest a Service user’s money according to the Service user’s instructions, documented on the Financial Transaction Form
- Declare any financial or business interests that may cause conflict with their ability to handle Service user’s money with honesty and integrity
- Report any problems, irregularities, or discrepancies to the finances of the Service user and report any concerns that the Service user is being defrauded by a third party, or has lost money or other valuables
- Report any concerns regarding capacity.

4.12 Collecting benefits for Service users: The UKHCA/Safeguarding Vulnerable Groups Act (2006) recommends that workers are aware of the following:

- If in receipt of benefits , the money is to be returned to the service user immediately and the transaction must be recorded in the agreed manner
- The use of and keeping secure, Service user PIN numbers where necessary in accordance with the banking code
<http://www.lendingstandardsboard.org.uk/>

4.13 Paying Bills: The UKHCA recommend that workers are aware of the following:

- Accurate verification of payments
- Getting bills stamped as paid
- Reporting in the Service user’s home that the bill has been paid and asking the Service user or their representative to verify with a signature

4.14 Withdrawing Cash from Service user’s accounts: Although according to the UKHCA this is not an advisable activity, this is because any withdrawals by an unnamed person from the Service user’s account may not be covered by insurance for loss. The work and type of support delivered to Service users will at times require Acacium Group workers to undertake this task. The UKHCA advice is that the following areas need to be addressed:

- Written authorisation from the Service user or their authorised representative
- Workers carry and present identification and authorisation at all times
- Workers are given guidance on the safe keeping of cash point cards, PIN numbers and what to do to report any losses in accordance with the Banking Code

4.15 Cash within the home: During the care planning process, service users and their families should have been discouraged from holding large sums of cash in their homes and advised that care workers will have a duty to notify their manager about such sums of money

4.16 Depositing money: Acacium Group workers may be required to deposit money on behalf of the Service user. The UKHCA provides guidance and advises the following for service providers:

- Before agreeing to this it is advisable to check the policy of the Service user’s bank
- Acacium Group provides sufficient insurance cover for conveying cheques and cash

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- Give workers guidance on carrying cash in relation to their own safety and security
- Ensure workers always return evidence of the transaction to the Service user or their representative and obtain a signature from the Service user or representative recording what has been done.

4.17 Gifts, wills and legacies:

- Acacium Group workers should refer to Acacium Group anti-bribery policy for guidance on gifts from Service users.
- Acacium Group workers should not benefit from a Service user's will or a bequest or legacy
- Acacium Group workers should not be involved in making or witnessing a will or legal document
- Acacium Group workers should not be an executor to a Service user's will.

4.18 Allegations of Financial Irregularities: All allegations of financial irregularities must be investigated in accordance with the Complaints and Incidents procedure and should be escalated appropriately.

4.19 Audit/Monitoring

4.19.1 The effectiveness of this policy will be regularly reviewed by the Clinical Advisory Group

4.19.2 This Policy will be reviewed on a regular basis

5. Associated Policies / SOPs

Policies

CLIN 09 Safeguarding Vulnerable Adults at Risk

CORP 01 Anti Bribery, Solicitation and Gifts

CORP 10 Policy on Policies

6. References

- UKHCA Code of Practice Amended August 2010 www.ukhca.co.uk
- UKHCA Fact sheet: Managing Finance (March 2003)
- No Secrets: Department of Health – updated 01/2015 www.doh.gov.uk/scg/nosecrets.htm
- Adult Support and Protection Act Scotland (2007) www.careinforScotland.co.uk/adult-support-and-protection.asp
- Safeguarding Vulnerable Adults (2006) Department of Health, Social Services and Public Safety www.hscboard.hscni.net – updated 07/2015
- Successor organisation to the Banking Code Standards Board - <http://www.lendingstandardsboard.org.uk/>
- Safeguarding of Service Users' Finances within Residential and Nursing Homes and Supported Living Settings. RQIA guidance Feb 2015

Appendix A: About Acacium Group

Acacium Group consists of a number of trading companies, each providing services within core niche areas of the health and social care industries. Therefore, as this document is a Group Policy, the Policy herein applies to all trading companies detailed below:

 Part of Acacium Group	 Part of Acacium Group
 Part of Acacium Group	 Part of Acacium Group

Appendix B: Legislation

1. This Policy is supported by legislation and national guidance as set out in the table below.

National policies, guidance, and legislation, supporting reporting and managing incidents.

Act, policy, guidance	Explanation
Health & Safety at Work Act 1974	The Health & Safety at Work Act 1974 requires that all organisations with more than three staff have in place processes to promote the health and safety of their staff.
Control of Substances Hazardous to Health (COSHH) Regulations 2002	Latex is classed as a hazardous substance which is covered by the Health and Safety Executive's Control of Substances Hazardous to Health (COSHH) Regulations 2002. Under the regulations, organisations have a duty to assess the risk, eliminate, substitute, and limit and control exposure to latex, unless there is a need to use it.
RIDDOR (The Reporting of Injuries, Diseases and Dangerous Occurrences) Regulations 1995	There is a requirement to report diagnosed cases of Occupational dermatitis (schedule 3) to RIDDOR (The Reporting of Injuries, Diseases and Dangerous Occurrences) Regulations 1995.
The UKHCA code of practice	The UKHCA Code of Practice provides guidelines to enable an organisation providing homecare to operate in such a way that: <ul style="list-style-type: none"> • The highest standards of care are provided • The rights and welfare of service users are paramount The rights and welfare of care workers are protected
The UKHCA: Managing finance fact sheet (2003)	The UKHCA have produced a fact sheet regarding managing finance for a service user. It gives the service provider guidance through all aspects of financial management and the process that are required to be put in place to safeguard the Service user and the worker
No Secrets: DOH – updated 01/2015	No Secrets is guidance developed by the Department of Health on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse (one of which is financial) www.doh.gov.uk/scg/nosecrets.htm
Safeguarding Vulnerable Adults (2006) Department of Health, social services and public safety – updated 07/2015	This act is for the protection of adults at risk of harm in Northern Ireland which includes financial abuse www.hscboard.hscni.net
Adult Support and Protection Act Scotland (2007)	The Adult Support and Protection (Scotland) Act 2007 (The Act) seeks to protect and benefit adults at risk of being harmed. http://www.gov.scot/Topics/Health/Support-Social-Care/Adult-Support-Protection
The Equality Act 2010 is an Act of Parliament of the United Kingdom. The Equality Act 2010 applies to everyone who provides a service to the public, whether or not a charge is made for that service. It covers statutory, private, voluntary and community sector organisations.	The primary purpose of the Act is to consolidate the complicated and numerous Acts and Regulations, which formed the basis of anti-discrimination law in Great Britain. This was, primarily: <ul style="list-style-type: none"> • The Equal Pay Act 1970, • The Sex Discrimination Act 1975, • The Race Relations Act 1976,

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	<ul style="list-style-type: none"> • The Disability Discrimination Act 1995 and • Three major statutory instruments protecting discrimination in employment on grounds of religion or belief, sexual orientation and age. <p>This Act consolidates earlier legislation and extends protection from discrimination to three new protected characteristics:</p> <ul style="list-style-type: none"> • Marriage and civil partnership • Pregnancy and maternity • Gender reassignment <p>It also introduces new duties for healthcare organisations to promote equality, have regard to socio-economic disadvantage and to tackle age discrimination.</p> <p>This legislation has the same goals as the four major EU Equal Treatment Directives, whose provisions it mirrors and implements.^[1] It requires equal treatment in access to employment as well as private and public services, regardless of the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, and sexual orientation. In the case of gender, there are special protections for pregnant women. However, the Act allows transsexual people to be barred from gender-specific services if that is "a proportionate means of achieving a legitimate aim".^[2] In the case of disability, employers and service providers are under a duty to make reasonable adjustments to their workplaces to overcome barriers experienced by disabled people. In this regard, the Equality Act 2010 did not change the law.</p> <p>Everyone has the right to be treated with dignity and respect. The Equality Act 2010 prohibits discrimination on named grounds. These are called 'protected characteristics'. The relevant protected characteristics are age, disability, gender re-assignment, pregnancy and maternity, race, religion, or belief, sex, and sexual orientation.</p> <p>Most of the Act came into force on 1 October 2010. The new public sector equality duty came into force on 6 April 2011.</p>
The Mental Capacity Act (2005)	<p>The five principles:</p> <ol style="list-style-type: none"> 1. Every adult has the right to make his or her own decisions and must be assumed to have capacity to do so, unless it is proved otherwise 2. People must be supported as much as possible to make decision before anyone concludes that they cannot make their own decision 3. People have the right to make what others might regard an unwise or eccentric decision 4. Anything done, or decision made, for or on behalf of a person who lacks mental capacity must be done in their best interests.

	Anything done or any decision made for, or on behalf of people without capacity should be less restrictive of their basic rights and freedoms
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2. **Equality and diversity**

Under the Race Relation (Amendment) Act 2000 Acacium Group has a statutory duty to ‘set out arrangements to assess and consult on how their policies and functions impact on race equality’, in effect to undertake Equality Impact Assessments (EIA) on all policies and SOPs. The Equality Act October 2010 demands a similar process of Equality Impact Assessment in relation to disability. An EAI must be completed by the author of this policy using the checklist provided in Appendix A. See also Acacium Group Equality and Diversity policy.

