

Finance Policy

This finance policy is an essential policy which must be read and signed by all employees. It should be read in association with the NatWest Debit Card Agreement and the following policies: Safeguarding Adults, Code of Conduct, Whistleblowing and the Employee Handbook.

February 2025
Review: February 2026





INTRODUCTION

This policy is about the way we need to work in order to protect the people we support form financial abuse. It also protects you from accusations when there are problems.

The policy is here to:

- Make you aware that the person you support needs your protection from people who may want to take advantage of them.
- Give you a clear set of rules about supporting someone to manage their money and money you hold on their behalf, e.g. support funds.
- Make sure everyone understands the importance of being clear around a person's money. We are responsible and accountable for all finances and people need help in order that their money isn't stolen or wasted.



- Make sure that everyone works the same way so that if, unfortunately, the person does have dishonest staff, they can be found quickly and dealt with appropriately.
 ANY money mismanagement or theft will result in disciplinary action being taken.
 Any theft of money will result in the involvement of the Police.
- Make it clear to you that, if you are worried that someone in the team may be stealing from, or taking advantage of, the person you support, you must do something about it straight away. You must report it immediately to your line manager and/or the Director/Finance Director.

WHY WE HAVE TO HAVE THIS POLICY

A lot of the people we support have spent time in long-stay hospitals or care services, in other cases we may be supporting young people who are going out on their own for the first time. This has meant they will have had very little money to call their own, will often had the control over their own money taken away from them and will have found it difficult to spend the money the way they wanted. It is a sad fact that many people who live in long-term care may have had money stolen from them by a variety of people, they may include staff. We desperately want to make sure that cannot happen in the services we provide.

One of the best safeguards we provide is in the way we support people. We purposefully set up small teams to support only one person and try to find staff who will grow to care for the person they work for. In a small team there is less opportunity for anyone who is not honest to steal without someone becoming suspicious quicky. By creating a team that really cares for the person, anyone who thinks it is acceptable to take advantage of vulnerable people will 'stick out like a sore thumb'.

We hope that every member of the team will be honest and wouldn't ever consider stealing from the person they support. In reality though this is probably naïve and so what we ask of the other people in the team is to tell the Team Leader and/or Service Leader if they are worried. Although we know that this can be difficult to do, try and remember that the person you support is relying on you to protect them. It is your responsibility to inform an appropriate person if you know or suspect any financial abuse.



One team member may think that putting a bit extra for themselves through on the support expenses/grocery shopping/timesheet is not that bad because Beyond Limits pays for all that. This is completely wrong, everything that is bought and paid for in a service comes from the person's personal money or from the monies provided to them to buy support i.e. their Individual Service Fund. Below you can see how this works.

HOW THE PERSON'S MONEY WORKS

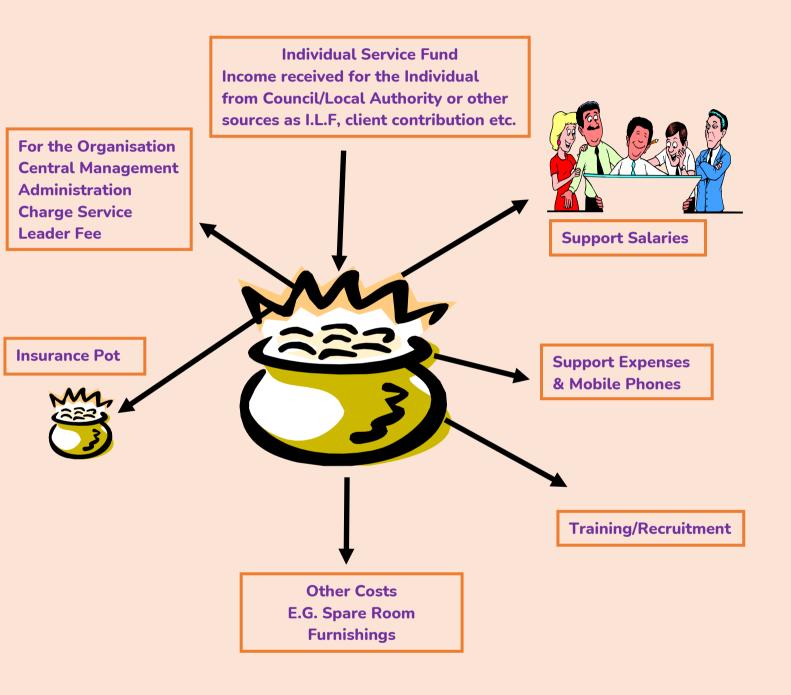
As an organisation we are responsible for all the monies within the Individual Service Fund that is provided to support each individual.

The Individual Service Fund (ISF) is provided to pay for all staffing costs, emergency cover, training, administration, service leadership and insurance. These costs are agreed with the relevant funding Council or other sources such as Independent Living Fund, client contribution etc. Any monies left over from each individual's ISF will be used to benefit that individual alone.

In addition, we may be responsible for helping an individual to manage their personal money as well; this depends on how much help the person may need. Some people need is to look after their money completely, others will only require a little bit of help, and some people are able to manage their finances themselves. The details of the support a person needs must be detailed in their Working Policy.

The person's benefits are provided by the Government to enable the person to pay for:

- Living expenses
- Food
- Bills
- Activities/leisure
- Clothing
- Toiletries
- Household purchases
- Décor and maintenance
- Holidays





SUPPORTING PEOPLE TO TAKE RESPONSIBILITY FOR THEIR OWN FINANCES

People's capacity to take responsibility for their own finances will be agreed with them within their Service Design and Working Policy and the level of any assistance they need will be recorded. Managing finances includes a variety of tasks; from paying for purchases, banking, paying bills to recording petty cash and Beyond Limits will support people to develop skills, where possible in all areas, thereby reducing the amount of support required by the organisation or other people. Financial support will be kept under review and changed as people develop their skills. Our aim is to enable people to manage as many tasks to do with their finances as possible and not to over support people.

If people we support are managing their own money, they should be advised to keep benefit books, cheque books, money and other valuables stored safely within their homes. If you support them to manage their own money, it should be locked away safely where they choose.

If required, Beyond Limits, with the input of the person's core team (including care coordinator) will provide relevant information on choosing financial institutions, saving options and paying bills by the best means, e.g. standing order/direct debit.

We will support people to gain independent financial advice when appropriate.

People will be encouraged and supported to maximise their income through benefit entitlement and finding employment, where appropriate.

BEING THE CORPORATE DEPARTMENT OF WORK AND PENSIONS APPOINTEE

Beyond Limits may have Corporate Benefit Appointeeship for people who are totally dependent on us to manage their money. This is very rare, and we will only take this on if there is no one else. Most people have family or the Local Authority to act as an Appointee, or a Court Appointed Deputy for them. We will have looked at all other options before agreeing to take on this responsibility. We will take on this role to ensure people receive the benefits they are entitled to. This is a responsibility not to be taken lightly and if we do this,



the Department of Work and Pensions (DWP) (Benefits Agency) tells us that it expects us to carry out the following duties:

- Finding out what benefits or allowances the person you support is entitled to
- Completing the necessary claim forms as if you are that person
- Making sure the benefits agency knows of any changes in circumstances
- Replying to guestions and letters about benefits
- When necessary, repaying any overpayments made in error

If we are an appointee then the person's direct team, particularly the Team Leader, must check the bank statements to make sure that benefits do not lapse. Benefit forms must be filled in promptly and any letters from the benefits agency must be responded to in a timely manner. If you are in any doubt as to how to do this, speak with your line manager as any delay often causes payments to be stopped. Responsibilities regarding Appointeeship will be recorded in the person's Working Policy.

If there are any changes in the person's benefits which you are not expecting (e.g. changes in rates of payment) you must alert your Service Leader immediately.

SETTING UP A NEW SERVICE

When a new service is set up, the Service Leader will work with the Director/Finance Director and Office Manager to set up bank accounts in the name of the person being supported. They will then give the necessary bank mandates to the Service Leader to gather the appropriate signatures from the team members. The Serve Leader should return the completed bank mandate to the Director/Finance Director or Office Manager as soon as possible and email them the date on which support monies should begin to be paid in to the No. 2 account.

The bank will process the mandate form, set up the accounts and send out the cheque books. The cheque books will be signed out the relevant Team Leader/Support Worker and up to 4 debit cards should be ordered per account.



As soon as the team receive the cheque books and debit cards, they <u>MUST</u> start following this Finance Policy by using secure money tins/ledgers/petty cash vouchers etc. and adhere to any <u>NatWest Debit Card Agreement that they would have signed before being issued the PIN number for the debit card.</u>

GENERAL RULES AROUND KEEPING THE PERSON'S MONEY SAFE

In order that everything to do with the handling (be it weekly support expenses or the person's own monies) is consistent and guards against anyone stealing from the person, we have to have a set of rules and guidelines in place. We have tried to keep these rules as simple and as brief as possible so that people are not spending a lot of time filling in paperwork.

RULES

- The Team Leader oversees the team, and it is the <u>Team Leader's</u> responsibility for budgeting the person's personal income, assuming the person is unable to do so alone, ensuring at all times the person receiving support has as much input/control as is possible and appropriate.
- Everyone in the team is <u>equally responsible</u> for making sure the money is spent wisely, and the person can afford their lifestyle. The person you support is no different from the rest of us and has to manage on a budget.
- Visits to banks or going shopping, where staff are involved to assist a person to manage their money, will be dealt with in a manner which is helpful and enabling to them as well as providing any evidence to other parties (family, managers, court of protection deputies, inspection agencies etc.) that all dealings are straightforward and have fulfilled the needs of the person.
- The team will keep <u>clear records</u> of all monies and spending (See below for further reference).



- At the <u>start of each shift</u> the staff member arriving on shift must count both the support money and the person's personal money tins, if appropriate, or any other monies they may be responsible for and ensure that they match with the ledgers. Any errors need to be brought to the attention of the person on shift previously, or if the person does not have a 24-hour service, to the Team Leader.
- The <u>team</u> are <u>responsible</u> for good money management and errors should be sorted out within the team. For example, if at the end of your shift the monies are 50p short then <u>you</u> are responsible for replacing it. <u>Being careful with money will avoid time consuming checking.</u> If the problem cannot be resolved the Team Leader must be contacted immediately.
- Once checked and agreed the balance should be logged as a handover count on the finance app by both members of staff before leaving your shift with any discrepancies being addressed and if unresolved being raised with the relevant line manager.

FINANCIAL TRANSACTION EVIDENCE FOR COURT OF PROTECTION

For those people we support who have Court of Protection Deputies, or the Department of Work and Pensions Appointees (who are not Beyond Limits) we must ensure that evidence of financial transactions we have been involved in on their behalf are given to them on a regular basis. This is because the Deputies will be monitored by the Court of Protection and this evidence will be required. Doing this also ensures Beyond Limits are checking for any financial irregularities in money they handle that belongs to the people we support.

WHAT IS A DEPUTY?

A Deputy is a person appointed by the Court of Protection who is given rights and responsibilities to make decisions about a person's (deemed to lack capacity) finances (benefits and savings) and/or welfare when the person is assessed to lack that capacity. This means they have legal rights to access the person's financial records and legal responsibilities that make them accountable for these decisions. A Deputy can be checked on by the Court of Protection at any time and therefore they require evidence to support decisions and financial spending if necessary.



WHAT IS AN APPOINTEE

A Department of Work and Pensions appointee is legally accountable for making decisions about how a person (who is deemed to lack capacity) spends their benefits. This does not cover how someone spends their savings (over and above their benefit entitlement) and if a person has savings or needs decisions made about welfare or housing related issues then a Court of Protection Deputy should be appointed.

THE PROCESS WE SHOULD FOLLOW

For the people we support who have Deputies or Appointee's (these will usually be the Department of Adult Social Care or family members) we may be asked to support the person to spend the money that is held by the Deputy. In which case we must keep evidence that we are doing so as the Deputy/Appointee will require this and that we are doing this in ways that safeguard the person's finances.

As we are involved in handling a person's money, we must therefore follow Beyond Limits policies around handling money. However, we must also ensure that we have agreement with the Deputy/Appointee and evidence for them that we are supporting the person to spend their money in a way that safeguards their finances.

This is the process to follow:

- The working policy <u>must</u> record who the Deputy/Appointee is
- When developing the working policy, we must agree with the Deputy/Appointee some financial standards including a budget (weekly or monthly), what we are going to support someone to do (e.g. withdraw money from a cash point, reconcile money, count the petty cash or pay at the checkout). The budget should include what items money can be spent on and an amount (e.g. £30 a week for food, £40 a month on clothes), what level of spending above which the Deputy wants to be notified and give the OK for this (this is usually around £50) and anything else the Deputy wants to be consulted about.



- The team leader should also agree with the Deputy whether they wish receipts to be kept at the person's home or to be sent to them on a monthly basis (this should be recorded as part of the financial section in the person's working policy)
- If the Deputy requires the monthly option, the Service Leader should be given the receipts by the Team Leader for the month and reconcile the figures on a summary sheet. Photocopies of the receipts should be made for the records of Beyond Limits if the original receipts are going to be sent to the Deputy.
- The Service Leader should alert the Director/Finance Director should they find any discrepancies whilst reconciling the expenditure.
- A copy of the monthly summary sheet should be kept in the Beyond Limits file for person in the central office.

RULES AROUND FAMILY MEMBERS HAVING ACCESS TO THE PERSON'S MONEY

- The time that the person you support spends with his/her family will be subject to same good money management rules as the time spent with staff.
- Any family member taking cash on behalf of the person must sign a petty cash slip prior to taking the money
- Any item or expenditure taken or used from the person's own personal monies must be agreed beforehand with the Team Leader or, in their absence the Service Leader.
 Receipts must always be provided.
- Any additional unexpected expenditure incurred by the family will also need to be clarified and agreed with the Team Leader or, in their absence, the Service Leader before any payment is made. This must also be receipted.
- If you have concerns that the person's money is being abused by family or friends you must report immediately to your Team Leader/Service Leader or Director.

Any payment for agreed purchases will only be given over if an acceptable detailed receipt is provided.



PERSONAL MONIES ACCOUNT

The person you support may have a personal monies account into which his/her benefits will be paid. This money will be used to make payment towards food, bills, clothes, toiletries and outings. The remainder of the benefits will accumulate and act as savings for the future. However, it is in the person's best interests that the balance of this account is kept below $\underline{£6,000}$ (six thousand) as any savings over this amount will affect his/her benefits. For every $\underline{£250}$ over $\underline{£6,000}$ any Income Support payment will reduce by £1.00 per week. If any personal savings reach £16,000 (sixteen thousand) Income Support is no longer payable. Reduction in Income Support may also mean other benefits the person receives are affected. These figures may change in the future, and it is our responsibility to ensure that we are aware of any changes that may affect the benefits of the person you support.

SUPPORT MONIES ACCOUNT

The person you support has a support monies account, the No. 2 account, into which travel expenses and support expenses for the team are paid by direct debit on a monthly basis. The money in this account if there to allow the staff to help the person, they support travel about, going out socially etc. Every service is different, and we encourage teams to talk to their Service Leader about being creative about how they put the support expenses to best use.

On occasion, other monies may be moved to this account form the person's Individual Service Fund (ISF) for agreed payments i.e. holidays, spare room furnishings etc. Any monies moved into this account must be agreed with the Service Leader.

The signatories for both these accounts will be as recorded on the bank mandate. If you have not been asked to sign the mandate you cannot sign cheques or be issued a debit card.



USING THE CASH LEDGERS

Support and Personal Cash Ledgers – Rules and Procedures (please be aware, breaching any of the following rules may result in disciplinary action)

- Every withdrawal of cash made from the bank account must be entered on the cash ledger
- Every entry of cash 'in' must be double signed by both persons signing the cheque and be accompanied by a petty cash voucher
- If regular bills (e.g. gas, phone) are being paid, the bill must always be paid by card/cheque
- A receipt must be provided for all purchases
- Any single purchases over £40 (other than groceries) must be agreed with the Team Leader beforehand.
- Any single purchase over £150 paid by cash must be agreed with the Service Leader beforehand. The Service Leader must confirm they have agreed this purchase by either initialling the cheque stub, signing the ledger or forwarding a letter/memo detailing the purchase for the team to attach to the petty cash voucher
- Daily checks should be carried out and recorded on the finance app

Finances will be audited monthly with transactions and receipts stored in the finance application on SharePoint.

For security reasons please do not keep excessive amounts of cash in the house. A reasonable amount should be agreed between the team and the Service Leader but in any event no more than £200 should be held. Any exception to this should be by agreement with your Service Leader (e.g. spending money required for a holiday)

Legally financial information must be kept for 6 years so do not be tempted to have a 'clear out' and never loan money from support account to personal account and vice versa

- NEVER loan money to staff from the individual's monies
- NEVER loan money to other services
- NEVER lend money to the service from your own personal money



USING THE BANK LEDGERS

Support and Personal Bank Ledgers (please be aware that breaching any of the following rules may result in disciplinary action)

- Every withdrawal made from the bank account will be pre-populated in the bank ledger app e.g. direct debit, standing order, ATM withdrawal and debit card point of sale, this transaction should be edited with the detail of the payment and a receipt or petty cash voucher uploaded.
- Money received into the account for benefits (e.g. Income Support, DLA, Support Monies) will be pre-populated in the bank ledger.
- Any cash withdrawals being made by cheque or debit card must be checked against the CASH ledger.

Copies of NatWest bank statements will be saved on SharePoint weekly at which point the statement balance should be checked against the "end of day" balance in the finance app and any discrepancies investigated, e.g. if income support benefit has stopped, contact DWP to find out why.

If bank statements are not in the SharePoint folder or transactions are not present on the finance app, the team leader must contact the service leader and finance team immediately.

Weekly checks should be carried out on the finance app by the team leader or nominated person. This is checking the "end of day" bank ledger balance against the weekly NatWest bank statement which is found in the bank statement folder.

The bank balance must be checked when monies go in or out of accounts to ensure that NO ACCOUNT can ever be overdrawn.



USING DEBIT CARDS/DIRECT DEBITS AND FINANCIAL AGREEMENTS

USING DEBIT CARDS

- Each bank account can have up to 4 debit cards on issue.
- You can only hold a debit card if you are a signatory on the bank mandate
- When a debit card is issued you will be asked to read and sign the terms and conditions of use.
- NEVER SHARE YOUR PIN NUMBER OR CARD WITH ANYONE
- NEVER STORE THE PIN NUMBER ALONGSIDE THE CARD
- IN THE EVENT YOUR CARD IS LOST OR STOLEN, REPORT THIS IMMEDIATELY TO YOUR LINE MANAGER AND THE BANK

USING DIRECT DEBITS

Often the easiest and safest way to pay regular bills is by using a Direct Debit. However, we should always be aware that there are benefits to paying regular bills 'over the counter'. By this we mean, think of the potential benefits for the person you support regularly going to the Post Office, Bank etc. The person you support will be seen out and about in their local community, paying bills like the rest of society. There may be potential to develop friendships in the places they visit, and the person might even find that new support worker they need.

How bills are paid should be agreed with the service leader as part of the service design and will be decided by what works for the person we support.



USING FINANCE AGREEMENTS

<u>Under no circumstances</u> must a member of staff apply for a credit card or store card on behalf of the person they support. This will be viewed as <u>Gross Misconduct</u> and will result in instant dismissal.

<u>Under no circumstances</u> must a team member make any purchase on behalf of the person that requires a long-term financial or hire purchase agreement without the explicit written agreement of the Service Leader. Failure to seek this written agreement in advance will result in disciplinary action being taken.

<u>Under no circumstances</u> should you order any items for yourself from a catalogue, store card etc. or enter into any other hire purchase transaction under the name of the person you support. Failure to adhere to the above will result in disciplinary action being taken.

USING THE PERSON'S PRIVATE PHONE

The Team Leader is responsible for ensuring the person's private phone bill is itemised.

The person you support pays their personal phone bill from their benefit payments. As this income is limited, everyone in the team should help the person keep this cost as low as possible. If you are making phone calls on behalf of the person (e.g. to the GP, the benefits agency, social worker etc.) try and make the calls brief and within any time period where it is cheaper dependent on their price plan.

You should not have to use the person's private phone as all teams are provided with mobile phones.

The person's private phone is not to be used to talk to other team members about the running of the service, e.g. problems, shift changes etc. Remember, there are other ways to talk to the rest of the team e.g. team phones, shift changeover, the communication diary, team meetings and support and supervision. Misuse of the phone by any team member will require the sum identified to be repaid promptly. Depending on the circumstances, it may also result in disciplinary action being taken.



HOUSEKEEPING CONTRIBUTIONS

The person you support will not pay for your food or drinks whilst you are supporting them in their home. It is up to the person you support/family, through working policy planning whether they wish staff to bring their own food and drink or contribute to the shopping budget. This decision and the detail of the contribution should be agreed with the Service Leader and worked out depending on how many shifts are worked etc. If no contribution is agreed, staff must bring in their own food.

You must be able to demonstrate your food contributions, therefore any agreement should be written up in the working policy and a log of monies kept with the finance records with signatures.

<u>PLEASE NOTE:</u> When the finances are audited you will be asked to explain and show how you record this system.

BUDGET FOR GETTING OUT AND ABOUT

The person you support will have a weekly budget for getting out and about from their support monies. This will not be a large budget and the team will work with the person to plan and use the money creatively. This money will need to pay for the person and your own entry to events, meals out if appropriate etc. As a team you will agree what is reasonable amounts of money to spend on drinks, meals etc. within the confines of the person's budget.

CLUB CARDS

If a person has a "Club Card", e.g. from Tesco or a Nectar card from Sainsbury (or any other points reward card) the number of this card must be recorded in the working policy, within the "managing money" section and if money coupons, money off vouchers etc. are sent to the person, these must be recorded as income in the accounting ledger. You must never use your own club card etc. to receive points gained through the shopping of the person you support. Spot checks will be carried out on receipts to check that the number used tallies with the number recorded in the working policy. Abuse of club cards, store cards etc. belonging to a person supported could lead to disciplinary action.



USE OF COMPUTER EQUIPMENT

If a person owns a personal computer, laptop or other form of internet access, it must only be used for accessing information for that person. Staff must not use it for their own personal use. This could result in disciplinary action (See IT, phones and social network policy)

USING THE CHEQUE BOOKS (SUPPORT AND PERSONAL)

On rare occasion using cheque books might be the only way to access funds. You will only be able to use the cheque books if you are on the bank mandate.

Cheques must never be made out to pay yourself or another person any sum of money without the explicit written agreement of the Service Leader.

SIGNING RULES

<u>CASH</u> - Cheques to the value of £150.00 ONLY can be cashed from each account in one day. These cheques require two signatures 'A' or 'C' (i.e. anyone on the mandate) plus the reverse of the cheque will require to be signed as you are withdrawing cash. UNDER NO CIRCUMSTANCES should you try to cash a cheque for an amount over £150.00. If you do, the bank will contact the Finance Department who will instruct them NOT to give you the cash and you will be asked to explain why you attempted to do so.

<u>CHEQUE PAYMENTS</u> – If you are paying for goods or services by cheque then two signatures (as above) are required up to the value of £250.00. Should you need to make a payment of over £250.00 then a third signature will be required, and this MUST be an 'A' signatory (i.e. the Service Leader or Director who has signed the mandate).

- All cheque stubs must be filled out with date, amount, what the monies are for and the
 initials of each person signing the cheque. The number of the cheque is to be written on
 the appropriate ledgers
- The person cashing/using the cheque should be an authorised signatory



- The person cashing/using the cheque should not sign the cheque until they are at the cash desk. They should also sign the back of the cheque before handing it over. This acts as a safeguard measure against someone casing the cheque if it is lost or stolen
- Cheques being used to draw support expenses must be made out to pay "CASH" and the amount to be withdrawn filled out.
- The second signature i.e. the person not cashing the cheque must check the cash ledger to confirm cash 'in'. A petty cash voucher should accompany this transaction.
- Blank cheques must never be signed by the second authorised signatory. If this happens
 the second signatory may be held responsible for replacing any money if it is stolen or
 misused. This may also result in disciplinary action being taken.
- Lost/stolen cheques or cheque books must be reported to the Team Leader/Service
 Leader and the bank immediately
- Any cancelled cheque must be kept and kept stapled to the appropriate stub
- When a new cheque book is needed, the old one must be taken to the office when collecting a new one; this allows verification of account number etc. They should then be retained with all other paperwork until required for the next monthly audit, at which point they will be retained in the office.

