



Managing Customers Valuables and Finances Policy

1.0 Purpose and scope

This policy outlines Notting Hill Genesis' approach to managing customers valuables and finances and how we support customers to retain control of their finances.

The policy applies to all accommodation based Care and Support services, including regulated Extra Care and floating support services.

We expect and encourage our customers to manage their own finances, but recognise that some people using our services may need support with some or all aspects of managing their finances.

The objectives are to determine when and how staff will provide assistance to customers with managing their personal finances, in particular:

- how we will support customers to manage their personal finances
- when we will handle money and valuables on behalf of a customer
- how we will manage the risks involved with handling money and valuables to safeguard our customers and staff.

The policy does not cover the payment of rent, abandonment of property, disposal of goods and possessions, anti-bribery, gifts and hospitality or anti – fraud, all of which are covered under separate policies.

2.0 Definitions

Money - including cash, payment cards, online accounts, digital payment transactions.

Handling money - where we physically receive cash or bank cards from, or on behalf of a customer and make financial transactions on their behalf or physically support them to do this.

Looking after money or valuables - where we receive and store a customer's money or valuables at their request or commissioned to deliver a specific service.

Personal finances - all matters relating to a customer's money, bank accounts, financial transactions and decisions about how to use their money.

Valuables - Jewellery, money, cheque/bank books, bank/credit cards, pension books, identification documents.

3.0 Reporting auditing and control

All activities and records relating specifically to managing customers valuables and finances are monitored and managed by the Care Coordinators, Lead Project Workers (LPW), Service Delivery Managers (SDM), Lead Service Delivery Managers (LSDM), Service Managers and Care and Support Compliance Managers or in their absence the Operations Managers (OM) or Regional Business Manager (RBM).

This information can also be accessed by Care Quality Commission inspectors upon request.

4.0 Our principles

We recognise that our customers may require support in a number of ways to manage their own finances.

The extent of support we can offer depends on the service we provide and may vary between our customers.

We work closely with other agencies to support customers with financial matters, in particular those qualified to provide financial advice and have guardianship of customer finances.

We seek to find the best support available for our customers and ensure to signpost accordingly to appropriate services.

We always assume that a customer has a capacity to manage their own finances. Where we believe a customer may not be able to do this, we work with the relevant agencies to assess the customer's capacity.

Our needs and risk assessment policies and procedures will assist the customer and Notting Hill Genesis to determine whether the customer needs and wants support with their personal finances and we agree the nature and duration of that support.

We clearly set out the details of the financial support needs in the support or care plans and assess the risk before the care or support commences.

We keep the financial support needs under review through scheduled support or care plan reviews or other professional meetings as applicable.

We never withhold a customer's money unless there is a legal basis to do so.

5.0 Supporting a customer to manage their personal finances

All customers have the right to spend, save or dispose of their own money as they wish. We respect a customer's right to manage their money and empower customers to make their own decisions about their finances.

Under no circumstances will we provide financial advice to customers. Similarly, staff do not make decisions about personal finances on behalf of a customer.

We ensure that our needs assessments consider the customer's financial circumstances to identify any unmet needs, which could include carrying out a welfare benefit assessment. We may support customers to develop money management and budgeting skills, should they want and require this.

Our staff tailor our customers' support plans to suit the individual customer's needs.

We signpost customers to specialist agencies, enable access to external services and facilitate legal representation or independent advocacy. This could also include supporting and helping customers with related tasks as set out and agreed in their support plans. Customers are given a choice of agencies as much as possible when signposting.

All actions and decisions involved with managing a customer's personal finances are agreed with the customer or appointed representatives and recorded on the relevant plans.

6.0 Handling a customer's money

As a first rule of principle, our staff do not handle a customer's money on their behalf, unless specifically agreed or specifically contracted to do so.

6.1 Emergency cases

In the case of any exceptional circumstances, where a customer may be at risk if we do not support them or there is a security concern, we will handle the customer's money. Clear procedures are in place to safeguard and protect both customers and staff in case of this happening and provide guidance on what constitutes an emergency.

6.2 Risk management

Prior to handling a customer's money, we assess the risk associated with the planned transactions taking into account the amount of money involved and the degree to which the money could be mishandled. Where the customer is able to manage their own finances but requires our support to handle money, the member of staff leading on the assessment will discuss and agree the risks associated with the transactions with a more senior colleague before starting the support.

7.0 Looking after a customer's money or valuables

We support customers to keep their money and valuables safe in the accommodation we own, where this is possible. We empower customers to purchase their own safe to keep in their accommodation where this is appropriate.

Unless there is an emergency, we do not provide any storage facilities for valuables or money at our schemes.

We encourage customers to seek their own safe storage and will only agree to look after a customer's money or valuables as a last resort for an agreed period. This facility is only available where a service has the facilities to store valuables in a safe manner in accordance with the Notting Hill Genesis insurance requirements.

The decision to look after a customer's money or valuables will take into account any risks for customers or staff.

Under no circumstances should our staff be involved in holding or taking the customer's money home.

We will work with a customer or customer representative, e.g. power of attorney, and communicate all agreed financial arrangements.

The total amount of valuables stored at any scheme should not exceed the amount agreed in our insurance standards.

We follow clear procedures for recording the admission and release of a customer's money or valuables to protect customers and staff members.

We advise our customers, that any money or valuables that we agree to look after will be stored at their own risk. Any claim regarding loss or damage will be referred to our Insurance Team and all claims will be assessed on their own merits.

8.0 Where a customer is not capable of managing their finances

We never become directly involved with managing a customer's money and personal finances. We signpost and support customers to access the right agencies for appropriate financial support and representation. Our staff consider the best interest of the customers at all times.

Under no circumstances will our staff become a legal appointee for a customer or accept power of attorney or other financial role on behalf of a customer.

We work with relevant agencies to assess who would be the most appropriate person to assist a customer with their financial matters, preferably at a formal care plan assessment or support review. Where there is no appropriate representative, we liaise with the local authority to apply to the Department for Work and Pensions to assign a legal appointee.

If at any time we believe that a customer no longer requires an appointee, we discuss the matter with the relevant agencies.

9.0 Safeguarding against financial abuse

All arrangements to support a customer with managing their personal finances are made with the consent of the customer or their legal representative and included in their support or care plan. Through our needs and risk assessment we identify any risks of financial abuse that need to be addressed as part of the support or care plan.

We work with the customer, or legal representative, and involved agencies to put measures in place to reduce the risk of identified opportunities for financial abuse.

We keep records and audits of all services, as a part of wider Safeguarding compliance strategy.

We follow our Safeguarding policy and procedures where we suspect financial abuse. Our whistleblowing policy provides guidance for staff who suspect a colleague of committing financial abuse. Our professional boundaries policy and code of conduct complements this policy and sets out the appropriate staff conduct regarding customers' financial affairs.

Any instances of our staff giving financial advice to a customer or accepting a customer's personal account details, debit cards, or PIN number is a breach of this policy and our insurance protocols and is strictly forbidden. Any breach or non-compliance with this policy will be investigated under our Disciplinary Policy and may result in disciplinary action up to and including dismissal.

10.0 Confidentiality and sharing information with third parties

We respect and protect the confidentiality and privacy of customers who use our services. We comply with all relevant data protection legislation and treat all financial records for customers as confidential and store such information securely. Specifically, electronic forms are stored securely on corporate database systems. Paper records are kept locked in a locked cabinet in a secure location on-site, i.e. locked office room.

In emergency situations we may share relevant financial information with emergency services if required.

If a request is made from other sources or third parties e.g. CQC, for information about a customer, we seek permission from the customer (or their advocate or legal representative, where appropriate) before sharing their financial information. This request and outcome of consent and the outcome of the sharing is recorded in the customer's daily communication log or customer file. Where the customer is unable to give consent, due to a lack of capacity to consent, we follow the code of conduct for the Mental Capacity Act 2005 and make a best interests decision. This decision will be recorded in the customer's daily communication log or in the customer file.

11.0 Insurance claims for stored valuables and money

Valuables and money stored in accordance with this policy are likely to be covered by our insurance. Full details of cover amounts can be requested from our Insurance Team.

Any disputes around valuables or money handled under the remits of this policy must be reported as an incident to the line manager and our Insurance Team as soon as possible.

Our staff members are not to make any assurances about compensation or validity of claim to customers.

12.0 Diversity and Inclusion

In writing this policy we have carried out assessments to ensure that we are considering:

- Equality, Diversity & Inclusion
- Privacy & Data Protection

To request a copy of these assessments, please email policy@nhg.org.uk

13.0 Reference

The following Acts are relevant to this policy:

- Mental Capacity Act 2005
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014

13.1 Care Quality Commission

This policy supports services registered with the Care Quality Commission to achieve the essential standards, in particular regulations 12, 13 and 17

[Regulation 12: Safe care and treatment](#)

[Regulation 13: Safeguarding service users from abuse and improper treatment](#)

[Regulation 17: Good governance](#)

Document control

Author	Michael Drozynski, Policy Officer
Approval date	7th May 2019
Effective date	19th August 2019
Approved by	Policy Group
Policy owner	Practice Excellence and Standards Manager; Care and Support Compliance Manager
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Version Control

Date	Amendment	Version
May 2019	New Notting Hill Genesis Policy created	1.0