

Title of Document	Handling of Customer Money Policy
Name of Department	Finance

What type of document is this?	Policy	This sets out instructions for how a particular procedure in Helping Hands is to be routinely carried out	
Which Helping Hands POL/SOP/W.I does this document relate to?	NA	Reference number of POL/SOP/W.I	NA

Which Operational Priority/Priorities does this document link to?	Governance Framework	Superior Client Care	People, Performance & Culture	

Custodian of document	Chief Financial Officer	Committee/Group responsible for this document	Policy Committee
Approval date and committee chairperson signature	04.03.25	When is its next scheduled review?	04.03.28

Who does it apply to?	All staff working with Customers who are required to handle monies					
	Does it apply to bank workers?	No	Does it apply to agency staff?	Yes	Does it apply to third party contractors?	No

Purpose of the Policy	<p>People who use Helping Hands services should be able to use and manage their money as and when they see fit to do so. Whilst some people need support to manage their finances, this should not override their right to access their money and choose how to use it.</p> <p>This policy defines the company and the employee's responsibilities in relation to customers financial management.</p>
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ROLES AND RESPONSIBILITIES

Role	Responsibility
Chief Financial Officer	Is responsible for reviewing and updating this policy.
Regional Care Directors	Must ensure their Operational Managers are adhering to this policy.
Operational Managers	<p>Must ensure adequate risk assessments are in place for any customers wishing to utilise this policy and must ensure risk assessments are reviewed at every customer Care Needs Review or sooner if required.</p> <p>Must ensure care workers understand the contents of this policy and requirements for compliance.</p> <p>Must ensure customer financial transaction audits are completed (in line with Auditing Work Instruction W.I-054) for adherence to this policy and conduct any necessary disciplinary proceedings for non-compliance, highlighting to HR, RCD and Quality.</p>
Care workers	<p>Must read, understand and adhere to the contents of this policy.</p> <p>Must report any incidents or concerns regarding customer finances to the relevant Operational Manager immediately.</p>

Key Policy Requirements

To avoid potential disagreements and misunderstandings and to protect Helping Hands employees and customer alike, all employees must take adequate precautions before and after handling customer's money (including cash, cashpoint cards, credit cards, bank and building society books, pension books etc).

All planned and foreseeable financial transactions with which employees are involved should be documented.

1.0 Key Requirements of Access Customer Money

1.1 Employees will only have dealings with finances of a customer if it is an explicit part of the support plan. Helping Hands shall ensure appropriate risk assessments are undertaken and the customer / lead contact understands and accepts the risks. Helping Hands shall ensure that customers understand their responsibility to monitor the process and to report any concerns immediately to Helping Hands.

1.2 When assessing the financial support required with the customer, if their preferred method of payment for employees to support them with is by use of debit/credit cards and pin numbers, in the first instance, the assessor should discuss with customer the option of setting up Carer's Card Account. A Carer's card account is a special feature on a bank account offered by many high-street banks that allow restricted access to the money

in a person's bank account. A risk assessment should be put in place with clear guidelines on when and how the card will be used.

- 1.3 If it has been assessed that employees will handle customer debit/credit cards and pin numbers, a risk assessment must be put in place with clear guidelines on when and how the card will be used.
- 1.4 Employees will ensure that only items requested by the customer are purchased. The employee may ask for a list of alternative products to purchase if required but will not access more money than specifically authorised by the customer.
- 1.5 Employees will ensure that the customer is aware how much money has been spent on shopping by obtaining a receipt for the items purchased. This receipt will contain details of individual items, their price, the method of payment and if applicable, how much change has been given to the employee to return to the customer.
- 1.6 Employees will ensure that all financial transactions are clearly documented, using the Access Care Planning app. Countersigned by the customer, where possible. Employees will ensure that all receipts will be kept with the customer, for audit by a manager or a representative of the customer. The financial transaction should be recorded on the app including a picture of the receipt and customer signature, and where the customer is unable to sign, a valid reason should be given.
- 1.7 Employees will ensure that where they have collected or received money on behalf of a customer, they will record receipt of the money onto the Access Care Planning app, this will show as a receipt and detail exactly how much has been collected on the customer's behalf.

2.0 Further Employee Restrictions

- 2.1 Employees will not overspend any allowances given (for example housekeeping cards) and ask the customer to reimburse them personally. Employees must refer and adhere to the Terms & Conditions in the Housekeeping Card Information Sheet.
- 2.2 Employees will not hold any money on behalf of the customer for any period of time without reason to spend with approval from the customer. Any financial transactions or purchases made on behalf of the customer should only be made during the planned visiting times.
- 2.3 Employees should not handle Carer's Card accounts, customer debit/credit cards and pin numbers unless there is a risk assessment in place with clear guidelines on when and how the card will be used. Receipts must be saved and uploaded to electronically on the financial log in line with requirement of 1.6.
- 2.4 Where it has been assessed that we do not support a customer with financial transactions

and if the customer requests financial support during a care visit (such as shopping), the employee must seek authorisation from their line manager, or where applicable the out of hours team, before support can be provided.

- 2.5 Employees should not set up subscriptions/payments for services on behalf of customers unless there is signed paperwork, agreement and internal approval from Finance.
- 2.6 Employees will not pool their own personal finances with those of the customer.
- 2.7 Employees will not act as an agent of the customer when dealing with financial transactions.
- 2.8 Under no circumstances should an employee be given access to a customer's online banking.
- 2.9 Employees will not accept or request a loan of money or borrow anything of value from the Customer, as this would be a breach of contract terms and conditions. If an employee is offered a gift from the customer of an estimated value <£20.00, this may be accepted if agreed with your manager and recorded in the daily visit notes. Any gifts offered in excess of £20, should be rejected in line with HHH-POL-059.
- 2.10 Employees will not purchase with the customer's money anything for anyone but the customer. Agreement with the customer must be documented.
- 2.11 Employees should refer to the DoLS policy when handling customer money where a customer is subject to a Court Order related to finances (Court of Protection) and keep all relevant paperwork and communications to hand.
- 2.12 Employees will not offer any financial advice to a customer; this type of advice needs a special licence which Helping Hands does not hold. Should the need of a financial query arise, then it should be sent to the Financial Controller or Finance Director of Helping Hands. This includes queries on opening and managing customer bank accounts, budgeting, spending decisions, financial risk management, and any other financial affairs of the customer.
- 2.13 Helping Hands will ensure that in the event the customer's money is lost or stolen in our possession, that this is reported to the appropriate authorities and the customer's representative(s) are informed in a timely manner, as this depends on capacity and customer choice.
- 2.14 Employee failure to adhere to these restrictions may mean that they will be subject to internal disciplinary proceedings in accordance with *POL-013 - Disciplinary Policy & Procedure*. Where allegations of financial abuse are proven, Helping Hands will give consideration to referring the employee for inclusion on the DBS Barring Register (list of persons banned from working with children and adults with health and social care needs). Further to this allegations of theft, fraud and illegal computer activity may be referred to the police.

TRAINING

Is training required?	Yes
Details of training	Line Managers should provide this policy to carers and go over carer responsibilities in relation to customer money.

COMPLIANCE

How is compliance with the POL going to be monitored	<p>Finance and Operational Managers will conduct sample checks and audits to ensure that this policy is effective and process is adhered to. If any legislation changes impact this policy this may result in a policy review.</p> <p>Regular customer audits must include a 'financial transactions' review for those customers with this risk assessment in place.</p>
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EQUALITY IMPACT ASSESSMENT AND PROCEDURAL INFORMATION

	Positive / Negative / N/A	Comments
Does the document have a positive or negative impact on one group of people over another on the basis of their:		
• age?	N/A	
• disability?	N/A	
• gender reassignment?	N/A	
• pregnancy and maternity (which includes breastfeeding)?	N/A	
• race (including nationality, ethnic or national origins or colour)?	N/A	
• religion or belief?	N/A	
• sex?	N/A	
• sexual orientation?	N/A	
• Marriage and Civil Partnership	N/A	
If you have identified any potential impact (including any positive impact which may result in more favourable treatment for one particular group of people over another), are any exceptions valid, legal and/or justifiable?	N/A	
If the impact on one of the above groups is likely to be negative:		
• Can the impact be avoided?	NA	
• What alternatives are there to achieving the document's aim without the impact?	NA	
• Can the impact be reduced by taking different action?	NA	
• Is there an impact on staff, client or someone else's privacy?	NA	

What was the previous version number of this document?	Version 02
Changes since previous version	Updated clause 2.9 aligned with POL-059

Who was involved in developing/reviewing /amending the POL?	Financial Controller Group Managing Director Quality Assurance Business Partner Quality Manager Quality Development Lead	
How confidential is this document?	Restricted	Can be shared freely within Helping Hands but NOT outside

References	The Health & Social Care Act 2008 (Regulated Activities) regulations 2014 The Regulations and Inspection of Social Care (Wales) Act 2016 Regulation 28: Supporting Individuals to manage their money	
Associated Documents	GUI-005 - Housekeeping Card Information Sheet Access Care Planning Support Plan	