



Multi Agency Guidance

Financial and Property Affairs

CONTENTS

1. Introduction

2. Types of authority in relation to financial and property affairs

3. Services provided by the Council in relation to financial and property affairs

4. Principles of the Mental Capacity Act

5. Financial abuse

6. Financial governance and best practice

7. Links and useful documents

The information within this document is correct as of February 2023

1. Introduction

This document has been created to provide guidance to and share best practice between care providers contracted by the Council who are required to provide some level of support in financial matters for service users and have a responsibility to report safeguarding concerns in relation to suspected financial abuse.

Examples (this list is not exhaustive):

- Residential and nursing care providers who receive, monitor and store personal allowance for residents
- Residential and nursing care providers who suspect financial abuse or neglect
- Care providers in the community who assist in financial matters for service users they support, such as collecting and storing personal allowance, making purchases for service users, monitoring personal allowance etc...
- Care providers in the community who suspect financial abuse or neglect

This guidance may also be useful to other service and care providers as 'good practice' guidance (where they are also required to provide some level of support in financial matters for service users and have a responsibility to report safeguarding concerns in relation to suspected financial abuse).

2. Types of authority in relation to financial and property affairs

It is important to be aware of the types of authority a person may have in relation to financial and property affairs and the duties and responsibilities associated with each type of authority.

A person who holds any of the below authorities should be able to provide evidence of this and you have a right to ask for this before entering into any discussions, contracts or transactions in relation to the financial and property affairs of service users.

This section of the document is to be used for information only and the Council does not assume or expect any individual provided with this information to follow it and would recommend that any person reading this information seeks their own advice.

LASTING POWER OF ATTORNEY

If a service user has mental capacity to make decisions about their property and financial affairs, they can appoint a person as their attorney. Lasting power of attorneys replaced enduring power of attorneys on the 1st October 2007. Service users may also appoint attorneys in relation to health and welfare so when asking for evidence of authority, providers should ensure they check the type of lasting power of attorney.

Note that enduring powers of attorney may still be used if they were made and signed prior to the 1st October 2007.

The service user can include preferences and instructions to tailor the document to their needs and it can be as detailed or as general as they want it to be. They can also specify whether they want it to be used as soon as it is registered or only when they don't have mental capacity.

The lasting power of attorney cannot be used until it has been registered by the Office of the Public Guardian. The cost to register a lasting power of attorney currently is £110. The forms can be completed by the service user or they can appoint a solicitor to draft up the documents, however they will charge for their services.

If a service user does not make a lasting power of attorney and they lose capacity to manage their own financial and property affairs the following appointeeship and/or deputyship procedures will apply. The costs may be higher, and the service user may not have as much input as to whom carries out the role and the decisions made on their behalf, than they would have if a lasting power of attorney had been made when they had mental capacity.

To gain full information and guidance contact the Office of the Public Guardian at <https://www.gov.uk/government/organisations/office-of-the-public-guardian>

APPOINTEESHIP

If a service user lacks mental capacity around financial and property affairs, they must have an appointee to receive their benefits. The person intending to be an appointee applies to the Department for Work and Pensions using a BF56 form and the appointee should receive a BF57 form confirming their appointment.

Whether or not appointeeship is granted is a matter for the Department for Work and Pensions and they would usually carry out a visit to confirm the service user requires an appointeeship. They can also end an appointeeship if they believe the appointee is not acting in the service user's best interests.

An appointee has authority to receive any benefits that the service user is in receipt of and the appointee must ensure any expenditure is for the service user. Appointeeship does NOT give authority to access private pensions, sign tenancy agreements, access bank accounts, savings, investments, sell property etc.... It ONLY gives authority to manage benefits.

Full details of the role and responsibilities of an appointee can be found at: <https://www.gov.uk/become-appointee-for-someone-claiming-benefits>

COURT OF PROTECTION DEPUTYSHIP

Appointeeship may be sufficient if the only income the service user has is benefits, however if they lack mental capacity around financial and property affairs and have any of the following, the appointee may need to apply for a deputyship order for property and financial affairs from the Court of Protection:

Bank accounts with money that the service user may require access to (this list is not exhaustive):

- Occupational / private pension
- Savings / investments
- Property

- Tenancy agreement requires signing
- Businesses

The application can be made by the appointee, or they can appoint a solicitor to make the application on their behalf, however they will usually charge for their services. There are fees associated with a deputyship application, some of which can be remised or refunded depending on the service user's financial situation.

The Council may intervene and apply for the role of appointee and/or deputy if the service user lacks mental capacity and does not have anyone appropriate and willing to take on the role, or if the current appointee / deputy is not acting in the service user's best interests. However, this is a last resort and should only be considered when all other avenues have been explored.

Full details of the role and responsibilities of a deputy can be found at <https://www.gov.uk/government/organisations/office-of-the-public-guardian> and <https://www.gov.uk/courts-tribunals/court-of-protection>

3. Services provided by the Council in relation to financial and property affairs

In some instances, service users do not have a family member / friend able to take on the role and sometimes the family member or friend may not be appropriate. They may have financially abused the service user or there may be conflict between family members, and they cannot agree who should take on the role.

Professional attorneys and deputies may take on these roles and, in some circumstances, it may be appropriate or necessary that the Council take on the role. This is only as a last resort when all other methods of support have been considered and found to be inappropriate.

- **Court of Protection deputyship for property and financial affairs** – as described above
- **Appointeeship** – as described above
- **General power of attorney** – management of a service user's financial and property affairs who have mental capacity but are physically incapable and / or at risk of or experiencing financial abuse

4. Principles of the Mental Capacity Act

A deputy, attorney or appointee should always consider the basic principles of the Mental Capacity Act when making decisions and although care providers should not take on the role of deputy, attorney or appointee, they will usually have some involvement with the financial affairs of the service users, particularly when the service user lacks mental capacity. It is therefore important for providers to consider these principles also.

Decisions and actions carried out under the Mental Capacity Act 2005 should be tested against the 5 key principles. The principles act as benchmarks for decision makers. Although there is no duty placed on persons or bodies to apply the principles, a failure to do so could be cited in legal proceedings as evidence of unlawful conduct.

Further information regarding the principles of the Mental Capacity Act can be found at:

<http://www.legislation.gov.uk/ukpga/2005/9/section/1>

<http://www.scie.org.uk/publications/mca/principles.asp>

5. Financial Abuse

What is Financial Abuse?

The Care Act 2014 states that financial abuse includes the following:

- (a) having money or other property stolen
- (b) being defrauded
- (c) being put under pressure in relation to money or other property
- (d) having money or other property misused

This could be expanded to include further detail:

- Theft of income – typically small transactions (less than £500)
- Theft of assets – more extensive, typically involves abuse associated with powers of attorney, deputyship or appointeeship, real estate transactions, identity theft or tax manipulation
- Misusing or stealing money, property, possessions including valuables, jewellery etc...
- Obtaining a vulnerable person's signature by force or deception or misleading them about what they are signing

Who carries out Financial Abuse?

Perpetrators of abuse are not confined to any section of society, and may be people who hold a position of trust, power or authority in relation to an adult at risk. A person who abuses may be:

- A member of staff, owner of an agency or service manager
- A member of a recognised professional group
- A volunteer or member of a community group such as a place of worship or social club
- A service user or vulnerable adult
- A spouse, relative or member of the person's social network
- A carer
- A neighbour, member of the public or stranger
- A person who deliberately targets vulnerable adults e.g. cold callers, loan sharks, online sites targeting people by email, bogus callers

As well as their responsibility to the person who has been abused, agencies whether statutory or non-statutory may have a responsibility in relation to the perpetrators of abuse, who may well be an adult at risk in need of care and support as-well.

Their powers and duties will vary depending upon the role of the perpetrator in relation to the agency.

All agencies should have their own policies and procedures in relation to safeguarding which outlines their roles and responsibilities. Further information regarding developing individual agency guidance can be found at the following: http://www.sunderlandsab.org.uk/?page_id=231

Indicators of Financial Abuse

Agencies that provide care and support to vulnerable people have by the nature of their involvement a unique position in that they will notice changes in personalities or activities. This could be symptoms or behaviours of the person's character or condition but it also could be an indicator that all is not well surrounding the client's finances.

Changes should not be ignored, and all possibilities should be considered

These could be:

- Unexplained sudden inability to pay for bills or maintain lifestyle
- Unpaid residential fees and personal allowance
- Service user lacks belongings or services they can clearly afford
- Recent acquaintances expressing sudden or disproportionate affection for a service user with money or property
- A lack of records and accounting of where money spent
- Unusual or inappropriate bank account activity
- Power of attorney or lasting power of attorney (enduring power of attorney being suddenly registered with the Office of the Public Guardian) obtained when service user is unable to comprehend and give consent
- Withholding money – in the case of residential clients where no personal allowance is being provided
- A recent change of deeds or title of property
- Unusual interest shown by family or others in the person or the person's assets
- Person managing financial affairs is evasive or uncooperative, unwilling to provide evidence of any legal authority
- Selling or offering to sell possessions of a service user who does not have mental capacity to consent or know the full value of those possessions.

Factors which may increase risk

There are certain factors, which may increase the risk of a service user being financially abused:

- The service user is unable to manage their own finances due to lack of mental capacity or numerical skills.
- The service user is unable to manage their own finances due to a physical disability, e.g. mobility, speech, hearing
- The service user is known as being isolated or is regarded as vulnerable within the community
- The service user who is isolated or lives on their own, lonely, may be more at risk of being exposed to financial pressure e.g. cold callers, loan sharks, online sites targeting people by email, bogus callers, being befriended by someone where there are concerns about the nature of the relationship

Tactics Used

- Intimidation
- Deceit
- Coercion
- Emotional manipulation

- Psychological abuse and/or empty promises
- The perpetrator may try to isolate the service user from friends, family, care providers and other concerned parties who would act in the service user's best interest
- The result being that the perpetrator prevents others from asking about the service user's well-being or relationship with the perpetrator and prevents the service user from consulting with others on important financial decisions

Your Role and Responsibilities

All agencies should have their own policies and procedures in relation to safeguarding adults at risk, which outlines their roles and responsibilities.

This should be reflected in the individual agency guidance. Further information in relation to this can be found at:

All agencies should also be aware of and have access to the current Sunderland Safeguarding Adults procedures www.sunderlandsab.org.uk and know how to report a safeguarding concern <https://adultsportal.sunderland.gov.uk/web/portal/pages/safeguarding>

6. Financial Governance and Best Practice

The following checklist was created to share best practice between care providers and ensure that service user's financial affairs are managed and handled appropriately by care providers.

Visits may be carried out with care providers by the Council to ensure the checklist points are being met and the below document will be used.

Financial Governance and Best Practice Checklist		
Service users are protected from abuse of any kind and are cared for by trained staff who safeguard their interests		
The service ensures that the service users control their own money wherever possible and that safeguards are in place to protect the interests of the service user		
Question	Evidence	Best Practice Rationale
SUPPORT Are service users supported to manage their own financial and property affairs if they have capacity to do so in accordance with governance arrangements?	Evidence will be obtained by discussions with the administrator / manager / owner Viewing any secure receptacles Viewing insurance documents Viewing a sample of service user's files	The ideal situation would be for every service user to manage their own financial and property affairs Efforts should be made to support service users to make their own decisions and be given all practical help before concluding that they cannot make those decisions Arrangements for access to secure receptacles (to which only SU has access) at times that are convenient to the service user Assistance with secure travel arrangements to bank / post office etc... Valid insurance to cover any cash held on site for the service user Providers should have evidence of any changes in arrangements, e.g. service user is no longer able to manage their own affairs Where a service user lacks capacity in relation to their financial and property affairs, arrangements are noted in their file

<p>CAPACITY</p> <p>Are providers aware of any service users that lack capacity in relation to their financial and property affairs?</p> <p>Is this noted in the service user's file?</p> <p>If provider has concerns regarding a service user's capacity in relation to their financial and property affairs, do they have a process to follow?</p>	<p>Evidence will be obtained by discussions with the administrator / manager / owner</p> <p>Viewing a sample of service user's files</p> <p>Examples of documentation will include mental capacity assessments, notes regarding service user's capacity</p>	<p>Providers should know whether or not a service user has capacity in relation to their financial and property affairs</p> <p>Details regarding service user's capacity in relation to their financial and property affairs should be noted in their file, if a mental capacity assessment is available this should be held on service user's file also.</p> <p>If providers have concerns regarding a service user's capacity in relation to their financial and property affairs, then they should refer to the social work team for a review</p>
<p>STORAGE</p> <p>Does the provider hold cash for service users on site?</p> <p>Does the provider hold cash cards / pin numbers for service users on site?</p> <p>Is service user's</p>	<p>Evidence will be obtained by discussions with the administrator / manager / owner</p> <p>Viewing any secure</p>	<p>The only cash held by the provider should be the PEA for a service user which should be used to purchase sundry items</p> <p>Provider should not be in possession of cash cards or pin numbers</p> <p>Secure receptacles are provided (with service user only access) at times that are convenient to the service user</p> <p>Secure storage is provided for cash/other valuables and private information</p>

cash held in a secure receptacle?	receptacles	Efforts are made to assist service users to store in a secure manner, respectful of their fundamental right to privacy around their finances
Who has access to the cash?	Viewing insurance documents	Any members of staff that handle or record service user's finances should be fully trained and aware of the processes and appropriate governance arrangements should be in place
How often is the cash counted?	Viewing a sample of service user's files	Cash should be counted, verified and recorded in accordance with governance arrangements, on at least a weekly basis and any discrepancies investigated and resolved
Who counts the cash?	Checking a sample of service user's funds in the receptacle to ensure it corresponds with what is recorded	The provider should have valid insurance to cover any cash held on site for the service user
How is this recorded?		
Are other items such as personal belongings, jewellery etc... held for the service user?		
Does the provider have appropriate insurance in place for cash held on site?		

<p>PEA (Personal Expenditure Allowance) Is any service users PEA held in a provider's bank account?</p> <p>If PEA is being held in a bank account that belongs to the provider, is the service user's PEA withdrawn and held on site as soon as possible?</p> <p>If PEA is being held in a bank account that belongs to the provider, is it clear either on a statement or monitoring sheet which money belongs to which service user?</p>	<p>Evidence will be obtained via discussions with administrator / manager / owner.</p> <p>Viewing insurance documents</p> <p>Viewing a sample of service user's files</p> <p>Viewing any statements relating to a provider bank account if applicable</p>	<p>In an ideal situation, a service user's PEA should not be stored in a company bank account.</p> <p>If it is, the funds should be kept separate from the provider's funds and residential fee payments Clear statements showing the balance of PEA held in the account should be readily available. The amount should not be allowed to accrue</p> <p>PEA should be withdrawn and held on site for service users to access as soon as possible.</p> <p>Any PEA held on site is in accordance with insurance policy and governance arrangements</p>
<p>PEA ACCESS How do service users access their PEA you hold?</p> <p>When can service users access the PEA you hold?</p>	<p>Evidence will be obtained via discussions with administrator / manager / owner</p>	<p>Service users should be able to access their PEA as and when they need at a time that is convenient to them.</p> <p>Processes should be followed to ensure that PEA going in or out is recorded appropriately, receipts are held where necessary and accounts are reconciled on at least a weekly basis</p> <p>Appropriate governance arrangements should be in place for access to keys to any receptacles</p>

	<p>Viewing any process and policy documents in relation to financial and property affairs and staff responsibilities e.g. service manual, staff handbook etc...</p> <p>Viewing a sample of service user's files</p>	
<p>PEA RECORDING AND MONITORING</p> <p>If members of staff purchase goods for service users is this recorded and receipts kept?</p> <p>Do all service users have PEA monitoring sheets?</p> <p>Are PEA monitoring sheets checked and reconciled on at least a weekly</p>	<p>Evidence will be obtained via discussions with administrator / manager / owner</p> <p>Viewing any process and policy documents in relation to how</p>	<p>If service users are unable to purchase items and staff carry out this task, any PEA taken should be recorded, any change going back in should be recorded and receipts should be held for any items purchased.</p> <p>If provider is holding PEA for a service user, then a PEA monitoring sheet or record should be completed</p> <p>Reconciliations should be carried out on at least a weekly basis and in accordance with governance arrangements</p> <p>Reconciliations should be carried out by a member of staff on an appropriate grade and should be checked by another member of staff</p> <p>PEA sheets should be stored securely as they contain personal financial information in relation to the service users</p>

<p>basis?</p> <p>Who carries out the reconciliations?</p> <p>Does anyone check the reconciliations?</p> <p>Are the PEA sheets stored securely?</p> <p>Who has access to the PEA sheets?</p>	<p>service users access their PEA / financial and property affairs</p> <p>Viewing a sample of service user's files</p> <p>Checking a sample of service user's funds in the receptacle to ensure it corresponds with what is recorded</p>	<p>Only staff of an appropriate grade and where it is essential to their role should have access to this information</p>
<p>PEA STAFF RESPONSIBILITIES</p> <p>Are staff members who handle or reconcile the PEA aware of their duties and responsibilities?</p> <p>Are all staff members aware of the process for service users to access their PEA?</p>	<p>Evidence will be obtained via discussions with administrator / manager / owner</p> <p>Viewing any process and policy documents in relation to financial and</p>	<p>Procedures and policies should be detailed, and should clearly outline roles and responsibilities of staff members, this could be in the form of a service manual or staff handbook</p> <p>Procedures and policies should have a specific section for financial and property affairs</p> <p>Best practice ensures that no member of staff is expected to carry out their duties without appropriate training, guidance and on-going support</p>

	<p>property affairs and staff responsibilities e.g. service manual, staff handbook etc...</p> <p>Viewing any documentation in relation to staff training</p>	
<p>EXCESS PEA Are staff members aware of the process to follow for service users whose finances are managed by the Council, in relation to excess PEA?</p> <p>Where excess PEA builds up and service user's affairs are not managed by the Council, does the provider contact the person responsible or make the service user aware?</p>	<p>Evidence will be obtained via discussions with administrator / manager / owner</p> <p>Viewing a sample of service user's files</p> <p>Viewing any process and policy documents in relation to financial and property</p>	<p>PEA should not be allowed to accumulate as this does not get the best possible return for service users and could exceed insurance policy restrictions</p> <p>There should be a method in place to return excess amounts to the service users or person with authority</p> <p>If service user's financial and property affairs are managed by the Council under a GPOA (General or Ordinary Powers of Attorney), then any PEA in excess of £200 should be returned and PEA amount reviewed</p> <p>If a service user's financial and property affairs are managed by the Council under COP (Court of Protection) or Appointee, then any PEA in excess of £100 should be returned and PEA amount reviewed</p>

	<p>affairs and staff responsibilities e.g. service manual, staff handbook etc...</p>	
<p>PEA MONITORING FOR CUSTOMER PROPERTY & AFFAIRS AND FINANCIAL SAFEGUARDING Is the provider aware of the procedure that Sunderland City Council have in place for PEA monitoring for any service user's whose financial and property affairs are managed by the Council?</p>	<p>Evidence will be obtained via discussions with administrator / manager / owner</p> <p>Viewing PEA monitoring records that CPAT and FSU have prior to audit</p> <p>Viewing a sample of service user's files</p>	<p>Providers should provide PEA monitoring sheets to the Council as and when requested in accordance with their procedures</p> <p>If service user's financial and property affairs are managed by the Council under a GPOA (General or Ordinary Powers of Attorney), then any PEA in excess of £200 should be returned and PEA amount reviewed</p> <p>If a service user's financial and property affairs are managed by the Council under COP (Court of Protection) or Appointee, then any PEA in excess of £100 should be returned and PEA amount reviewed</p>

<p>INVENTORIES</p> <p>Are inventories carried out of service user's belongings?</p> <p>Are these reviewed regularly / when changes occur?</p>	<p>Evidence will be obtained via discussions with administrator / manager / owner</p> <p>Viewing a sample of service user's files</p>	<p>Inventories should be carried out when a service user enters residential care and reviewed on a regular basis and when changes occur, especially in cases where the service user lacks capacity in relation to their property and affairs</p> <p>Inventory records should be stored securely</p>
<p>DECEASED SERVICE USER'S AFFAIRS</p> <p>Does the provider have a clear process for staff members to follow in relation to a service users' financial and property affairs when they die?</p> <p>Are staff members aware of the process to follow if service user's financial and property affairs are managed by the Council?</p>	<p>Evidence will be obtained via discussions with administrator / manager / owner</p> <p>Viewing a sample of service user's files</p> <p>Viewing any process and policy documents in relation to financial and property affairs and</p>	<p>Have a clear process in place for staff members to follow in relation to property and affairs when a service user dies</p> <p>Where the Council have involvement they are notified immediately</p>

	staff responsibilities e.g. service manual, staff handbook etc...	
2. Where homes are managing money or service users are not controlling finances, the reason for this is clearly documented, recorded and agreed via care planning and risk management process and is in accordance with requirements related to the Mental Capacity Act		
Question	Evidence	Best Practice Rationale
If service users don't manage their own money, does the provider know who does?	Evidence will be obtained via discussions with administrator / manager / owner Viewing a sample of service user's files	Best practice ensures that no provider holds Deputyship, Appointeeship or Power of Attorney for a service user as this is at the very least a conflict of interest Providers should know who has authority to manage a service user's affairs if they are unable to manage their own There should be notes within the service user's file with contact details for person with authority Providers should have evidence of any changes in arrangements, e.g. service user is no longer able to manage their own affairs, change to who is managing service user's affairs
Does the provider have copies on service user's file of any authority a person may have for Deputyship, Lasting Power of Attorney (LPA), Enduring power of Attorney (EPA), Appointeeship, in relation to a service user's financial and	Evidence will be obtained via discussions with administrator / manager / owner Viewing a sample of service user's files	Where a person has authority to manage a service users financial affairs the provider can evidence that they have viewed the authority Documentation which evidences any authority a person has in relation to a service user's financial affairs stored in file / care plan In Council-managed cases a letter advising they have authority is sufficient, however a copy of the authority may be requested

property affairs?		
Does the provider have a process to follow if they are unable to obtain a copy of this authority?	<p>Evidence will be obtained via discussions with administrator / manager / owner</p> <p>Viewing a sample of service user's files</p>	<p>Where the provider has not been permitted to view the authority there should be evidence that attempts were made to obtain it and the provider should report the concern to the social work team</p>
Does the provider have a process to follow if a person with authority does not provide PEA for the service user?	<p>Evidence will be obtained via discussions with administrator / manager / owner</p> <p>Viewing a sample of service user's files</p>	<p>Where PEA is not being provided for a service user, the provider should make attempts to address the issue and these attempts should be recorded</p> <p>If attempts are not successful they are evidenced and if required the social work team should be notified and safeguarding referral considered</p>
Does the provider have a process to follow if a person with authority does not pay the service users residential fees?	<p>Evidence will be obtained via discussions with administrator / manager /</p>	<p>If two payments are missed for local authority funded service users residential fees the provider should notify the Council via the Council's Debt Management Officer</p> <p>If payments for residential fees are missed for self-funding residents, the provider should follow their own legal procedures to resolve the matter</p> <p>In addition to this where a provider becomes aware that a self-funding resident is in arrears of more</p>

	<p>owner</p> <p>Viewing a sample of service user's files</p>	<p>than six weeks with their payments, the provider will offer to refer the resident to the Council for a financial assessment. The provider will obtain the consent of the private resident or their representative prior to making the referral to the Council.</p> <p>If the service user's placement is put at risk, the social work team should be notified and a safeguarding alert considered</p> <p>In addition as well as contacting the social work team and following Sunderland Safeguarding procedures the Provider will need to comply with the following statement, and should also take action which is identified in their own individual agency guidance.</p> <p>The Contractor shall not become involved in the Service User's finances, financial transactions or dealing with Service User's property in any way without the Council's consent.</p> <p>The Contractor shall take all necessary steps to ensure the security of Service User's finances whilst at the Service.</p> <p>Any loss of Service Users' money, or property should be reported to the Service Users' Health and Social Care Professional in writing immediately.</p> <p>The Contractor shall make clear to the Service User or the Service User's relative/advocate their insurance cover in respect of Service Users personal effects.</p> <p>If PEA is not being provided the social work teams are informed and safeguarding referral considered</p>
<p>Does the provider have a process to follow if they have concerns about the management of a service user's financial and property affairs by another person?</p>	<p>Evidence will be obtained via discussions with administrator / manager / owner</p> <p>Viewing a sample of service user's</p>	<p>If the provider suspects financial abuse or neglect in relation to a service user's financial and property affairs the provider should notify the social work team and a safeguarding referral should be considered</p>

	files	
Does the provider have a process to follow if they have concerns about a service user's capacity or capability to manage their financial and property affairs?	Evidence will be obtained via discussions with administrator / manager / owner Viewing a sample of service user's files	If there is not an appropriate and willing person able to apply for the relevant authority to assist in the management of a service user's financial and property affairs, or there are concerns in relation to that person, then the provider should contact the social work team, as a referral to the Council for property and affairs management or financial safeguarding team referral may be required.
Is any PEA held for service users who lack capacity stored and recorded in the same way as in point 1.?	Evidence will be obtained via discussions with administrator / manager / owner Viewing a sample of service user's files	All best practice detailed above in point 1. is followed for service users who lack capacity in relation to their financial and property affairs
3. Staff practice is in accordance with financial policies and procedures which prevent financial abuse		

Question	Evidence	Best Practice Rationale
<p>Does the provider have written policies and procedures in relation to:</p> <ul style="list-style-type: none"> - Storage of money - Cash Handling - Receipt and removal of money - Personal Allowances - Safe access - Purchasing procedure - Storage and retention of receipts - Counter signatory procedure - Property / inventory procedures - Returning excess funds - Resident deaths - Whistleblowing - Reporting abuse <p>Are they reviewed and signed off?</p>	<p>Evidence will be obtained via discussions with administrator / manager / owner</p> <p>Viewing any policies and procedures in relation to the items listed and any notes regarding when they are updated / reviewed / signed off</p>	<p>Best practice ensures that no member of staff is expected to carry out their duties without appropriate training, guidance and on-going support</p> <p>Roles, responsibilities, duties, processes and procedures in relation to financial affairs are written down for staff members to refer to whether this be in a service manual or staff handbook</p> <p>Staff members should have had access to appropriate tools to carry out their responsibilities</p>

<p>Do all members of staff attend training in relation to</p> <ul style="list-style-type: none"> - Safeguarding that includes financial abuse - Whistle blowing - Reporting abuse 	<p>Evidence will be obtained via discussions with administrator / manager / owner</p>	<p>Staff records or training records to show that all staff members have received the appropriate training in relation to those procedures and those connected to safeguarding including financial abuse</p> <p>Best practice ensures that no member of staff is expected to carry out their duties without appropriate training, guidance and on-going support</p>
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7. Links and Useful Documents

Links

- Office of the Public Guardian
<https://www.gov.uk/government/organisations/office-of-the-public-guardian>
- Department for Work and Pensions
<https://www.gov.uk/government/organisations/department-for-work-pensions>
- Money Helper (formerly Money Advice Service)
<https://www.moneyhelper.org.uk/en>
- Court of Protection
<https://www.gov.uk/courts-tribunals/court-of-protection>
- Age UK
<http://www.ageuk.org.uk/>
- Hourglass (formerly Action on Elder Abuse)
<https://wearehourglass.org/>
- Sunderland City Council – How to report a safeguarding concern
<https://adultsportal.sunderland.gov.uk/web/portal/pages/safeguarding>
- Sunderland City Council – Financial Safeguarding (Getting your financial affairs in order; Managing someone else’s financial affairs; Reporting financial abuse)
<https://www.sunderland.gov.uk/article/13326/Financial-safeguarding>
- Sunderland Safeguarding Adult Procedures
www.sunderlandsab.org.uk
- Mental Health Act – Basic Principles
<http://www.legislation.gov.uk/ukpga/2005/9/section/1>
<http://www.scie.org.uk/publications/mca/principles.asp>
- Wills, probate and inheritance
<https://www.gov.uk/wills-probate-inheritance/overview>
- Care Act 2014
<http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

Useful Documents

1. A personal expenditure allowance (PEA) record (see next page).

Personal Expenditure Allowance sheet (SAMPLE)

ESTABLISHMENT NAME:		CLIENT NAME:					
Date of Expenditure	Transaction Type	Receipt/Reference No	Credit (in)	Debit (out)	Balance	Entered by	Authorised by
<u>Reconciled Date</u>		<u>Name of Reconciler</u>		<u>Countersigned - Manager or Administrator</u>			
				<i>**Reconciler & counter signatory cannot be the same**</i>			