

## Policy Context

Life Without Barriers (LWB) is committed to upholding the rights of people with disabilities and ensuring NDIS Practice Standards are upheld and associated Quality Indicators observed.

To that end, all LWB staff, volunteers and contractors are required to abide by all legislation, policies and procedures relevant to clients' financial affairs and money, including the requirements of this policy guideline.

LWB support clients to use their money and property as they determine and recognise that when support is provided as appropriate to each individual there are inherent risks. Accordingly, policies and procedures are in place to uphold a client's rights while creating an environment that minimises the opportunity for fraud and exploitation.

## 1. Consent

In the first instance, LWB assumes that everyone has the capacity to make their own decisions. However, where LWB staff are concerned that a client may lack the capacity to look after their own money, LWB must endeavour to assist the client to identify an appropriate Authorised Decision Maker, preferably a family member or by referring to the Public Trustee as a last resort.

Where the client lives in a Host Family or Live in Carer model of support, the carer is prohibited from being the Authorised Decision Maker unless appointed by court order or Power of Attorney.

A record is to be maintained that identifies the Authorised Decision Maker for each client.

LWB will only handle a client's personal money under the direct consent of the client for the purposes the client or their Authorised Decision Maker intends.

## 2. Responsibilities

The specific responsibilities of clients / their Authorised Decision Maker, LWB staff, volunteers and contractors in relation to supporting clients' money and property are set out in the following table:

Position Title	Responsibilities
<b>Clients and / or their Authorised Decision Maker</b>	<ul style="list-style-type: none"> <li>Advise LWB if support is required to assist a client to store, access and spend their own money.</li> <li>Determine the best way LWB can provide this support to ensure that the client / their guardian / Authorised Decision Maker determines how money is accessed and spent.</li> <li>Work with LWB to develop a safeguarding mechanism to account for money stored and spent.</li> </ul>

Position Title	Responsibilities
	<ul style="list-style-type: none"> <li>• Ensure all money spent during the course of LWB delivering supports and services is accounted for in the client's personal banking records.</li> <li>• Raise any financial discrepancies with LWB promptly to enable effective investigation of the concerns raised.</li> </ul>
<b>Disability Support Worker, Volunteer and Contractor</b>	<ul style="list-style-type: none"> <li>• Provide direct support to clients requiring assistance with daily spending and support of money management, as determined by the client or their Authorised Decision Maker.</li> </ul>
<b>Key Worker / Case Manager /</b>	<ul style="list-style-type: none"> <li>• If required, ensure the safe storage of the client's money where LWB has been requested to provide this support.</li> <li>• If required, ensure clients determine how they spend their own money and that LWB does not provide financial advice or information other than that which would reasonably be required.</li> <li>• Oversee access to client funds by employees.</li> </ul>
<b>Coordinator / House Supervisor / Front Line Supervisor / Team Leader</b>	<ul style="list-style-type: none"> <li>• Identify clients' needs regarding accessing, storing and spending their own money and oversee staff, volunteer and contractor involvement.</li> <li>• Support and direct staff, volunteers and contractors providing assistance with client money and finances.</li> </ul>
<b>Operations Manager / Regional Director</b>	<ul style="list-style-type: none"> <li>• Ensure that each service facility has appropriate money holding and recordkeeping systems in place in respect of clients' money.</li> </ul>

### 3. Planning and Budgets

LWB strives to ensure a client's capacity to manage their own finances is understood soon after first receiving our services. This is documented and reviewed by way of regular planning meetings.

Clients who do not manage their own finances should have a personal budget, approved and overseen by their financial manager. This budget should be shared with the client and LWB, where LWB provide support for a client to store, access and spend their own money.

## **4. Principles Applicable to all Employees, Carers, Contractors and Volunteers**

When policies are absent or unclear, the following principles noted below should be applied.

**Any breach of these principles may constitute a reportable incident that must be reported to the NDIS Quality and Safeguards Commission or may lead to investigation that could result in performance management, loss of employment or criminal charges.**

LWB employees, volunteers, contractors and carers should:

- Ensure wherever possible there is a segregation of duties – the person providing support or making a purchase on behalf of a client is not the person reviewing receipts and expenditure.
- Ensure that, unless extenuating circumstance exist, the client remains in possession of all personal finances (e.g. cash, key cards, gift cards).
- Ensure clients are supported to develop skills in relation to finances and decision making.
- Not borrow or lend money from a client to themselves, another client or petty cash.
- Not withhold money from a client without consent.
- Not be a signatory to a client's bank account.
- Not provide direct support to the client to establish a bank account.
- Not use a client's ATM card at any time without their consent.
- Not withdraw more than the client's agreed amount from their bank account / ATM.
- Not have online banking access to a client's bank account.
- Not sell any items to clients including things associated with party plans.
- Not acquire points or other financial gains arising from supporting clients.
- Not participate in gambling activities while supporting a client (even if the client is doing so).
- Not undertake personal shopping while supporting a client (excluding drinks / meals).
- Minimise the use of cash for transactions and the storage of cash on premises.

## **5. Responding to Situations of Suspected Fraud**

Employees are responsible for identifying the potential misuse of funds and fraud as per the ['Stop it Before it Starts'](#) campaign. In the event that client monies are found to be missing, or a misappropriation of funds is identified, the immediate supervisor is to be notified and the relevant Director advised. The State Director is required to report the incident to the Executive Director, Corporate Services & Finance as soon as practically possible.

All incidents are reported via the Incident Management system. All incidents of fraud will also be reported to the relevant state Police department. For more information, please refer to the [Fraud Prevention Guideline](#).

## **6. Recordkeeping and Financial Controls**

Documentation is maintained for each client including profile, plans, receipts, authorised person and file notes pertaining to expenditure. Where practical all records should be countersigned.

## **7. Related Policies & Guidelines**

- [Supporting Clients Personal Finances \(Disability Services\) Procedure](#)
- [Fraud Prevention Guideline](#)
- [Stop it Before it Starts Campaign](#)
- [Privacy and Confidentiality Policy Guideline](#)
- [NDIS LWB 923 Reportable Incidents – Procedure](#)

## **8. Audit / Evaluation**

LWB engage accredited independent auditors to review financial processes and internal quality audits to ensure compliance with policy and procedures.