



**PARTICIPANT MONEY AND
PROPERTY POLICY &
PROCEDURES**

SEPTEMBER 2022



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Glossary of terms

Term	Definition
Financial Advisor	<p>A financial planner (also known as a financial adviser) is a person or authorised representative of an organisation, licensed by the Australian Securities and Investment Commission (ASIC), to provide financial advice.</p> <p>https://www.moneysmart.gov.au/investing/financial-advice</p>
Financial Advice	<p>Financial advice is advice given by a licensed Financial Adviser in relation to financial matters, including (but not limited to):</p> <ul style="list-style-type: none"> • Investing; • Superannuation; • retirement planning; • estate planning; • risk management; • insurance; and • taxation. <p>https://www.moneysmart.gov.au/investing/financial-advice</p>
Financial Counselling	<p>Financial counsellors provide information, support and advocacy to assist people in financial difficulty. Working in community organisations, their services are free, independent and confidential.</p> <p>Financial counsellors have an extensive knowledge of a range of areas of law and policy, including consumer credit law, debt enforcement practices, the bankruptcy regime, industry hardship policies and government concession frameworks.</p> <p>Financial Counsellors are based in community agencies and are funded largely by either State Governments or the Federal Government.</p> <p>Financial counsellors provide a free, independent and confidential service.</p> <p>https://www.financialcounselingaustralia.org.au/Corporate/Financial-Counseling</p>
Participant	A person who meets the NDIS access requirements.
Person Centred	<p>Person centred approaches:</p> <ul style="list-style-type: none"> - place the participant at the centre of any planning and support process - allow the person to choose and direct the support they receive according to their aspirations and goals, and how they receive that support - focus on the strengths, contributions, and abilities of the participant - recognise the uniqueness of each participant - work to maximise personal connection and social participation
Policy	A statement of intent that sets out how an organisation should fulfil their vision, mission and goals.
Procedure	A statement or instruction that sets out how a policy will be implemented and by whom.



Policy Purpose

This policy is to ensure that each participant accessing supports from our organisation can use their own money and property as determined by them. Additionally, we have strategies in place to ensure that participant money and property is secure.

We acknowledge the rights of each participant to have:

- Full access to, and control over, his/her/they own money.
- Their own personal possessions, and to use them as she/he/they see fit.

Objectives:

The Participant Money and Property policy aims to achieve the following:

- In receiving supports from ICAS, each participant has full access to, and control over, his/her/they own money.
- In receiving supports from ICAS, each resident has the right to have and use their own personal possessions as they see fit.
- We have processes in place to protect the participant and their assets where we have access to a participant's money or other property.
- Where we have access to a participant's money or other property, we have processes in place to ensure the participant's assets are developed, applied, reviewed, and communicated to both participants and their chosen supporters, and to the personnel within our organisation that have contact with participants accessing supports from us.
- Where required, we will provide support to access and support their money, as they identify and choose.
- We do not provide financial advice or information other than that reasonably required under the participant's plan.
- We review our policies, procedures, and processes, and take action, following a breach of our Participant Money and Property policy, to ensure that similar incidents do not recur.
- Misuse of participant's money, and/or other financial abuse, by personnel of ICAS will result in immediate termination of employment on the grounds of gross misconduct. Furthermore, the incident will be reported to the police and the NDIS Quality and Safeguards Commission.

Scope

This policy applies to all employees within ICAS.



Policy Statement

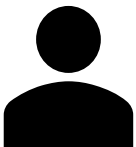
ICAS will ensure that each participant accesses responsive, timely, competent, and appropriate supports to meet their needs, desired outcomes, and goals.

Our **Participant Money and Property** policy is based upon:

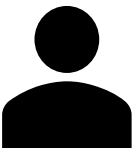
- Our recognition of the legal and human rights of each participant
- The participant's right to choice and control of supports delivered by us
- Our commitment to communicating with participants in the language and mode that they identify and best understand
- Recognising and respecting the individual identity and personhood of each participant
- Ensuring as far as possible the participant is supported to engage with family, friends, and his/her/their chosen community.
- Ensuring all workers act with integrity, honesty and transparency.


This policy complies with the requirements under the [National Disability Insurance Scheme\) Quality Indicator Guidelines 2021](#) and [NDIS Code of Conduct](#)


Roles and Responsibilities

Director	Responsibility	Delivery
	Establishing a culture that promotes the recognition and commitment to upholding of the Participant Money and Property Policy.	<p>Openly reports on organisation's commitment and compliance with the legal and human rights of participants.</p> <p>Reviews and identifies issues and encourages staff to make recommendations to implement ongoing continuous improvement in relation to the Participant Money and Property Policy.</p> <p>Ensures the Participant Money and Property Policy is properly administered.</p> <p>Reviews the Participant Money and Property Policy with management and staff annually.</p> <p>Supports and ensures staff are trained in Participant Money and Property Policy and processes.</p>



Quality Assurance Officer	Responsibility	Delivery
	<p>Manages and maintains the application of the Participant Money and Property Policy.</p> <p>Delivers training on the Participant Money and Property Policy and procedures.</p>	<p>Frequently reports to Director on issues and compliments relating to the Participant Money and Property Policy and procedures.</p> <p>Ensures the understanding, and application, of the Participant Money and Property Policy and procedures.</p> <p>Analyses compliance with the Participant Money and Property Policy and procedures across staff, including checking of reconciliation of receipts, and works with the Director to implement quality improvement processes.</p> <p>Works with the Director and staff to encourage feedback from participants in relation to the Participant Money and Property Policy and procedures to support quality improvement processes.</p> <p>Supports and encourages staff to deliver the Participant Money and Property Policy and delivers mentoring and training where deficits are identified.</p> <p>Provides adequate training to staff to ensure the Participant Money and Property Policy and procedures are understood and delivered.</p> <p>Acknowledges and rewards staff who demonstrate excellence in upholding the Participant Money and Property Policy.</p>

Staff who work with participants	Responsibility	Delivery
	<p>Ensures delivery of the Participant Money and Property Policy in accordance with the ICAS's policy and procedure.</p> <p>Attends training on the Participant Money and Property Policy and procedure.</p>	<p>Comply with the Participant Money and Property Policy and procedure.</p> <p>Provide feedback to management on issues and opportunities relating to the delivery of Participant Money and Property Policy and procedures.</p> <p>Understand, practice, and deliver the Participant Money and Property Policy and procedures in working with participants.</p> <p>Identifies opportunities for improvements in the Participant Money and Property Policy and procedures.</p>

All staff	Responsibility	Delivery
	<p>Demonstrates compliance with the organisation's Participant Money and Property Policy and procedures.</p> <p>Attends training on the Participant Money and Property Policy.</p>	<p>Provides feedback to management on issues arising from complaints.</p> <p>Understands and practices the Participant Money and Property Policy and procedures in any interactions with participants.</p> <p>Is aware of, and understands, changes to the Participant Money and Property Policy and procedures.</p> <p>Implements quality improvement changes as directed by management from evaluation of performance against the Participant Money and Property Policy and procedures.</p>

Last Reviewed: 22nd September 2022

Last Updated: 22nd September 2022

Signed: by Director





Procedure Purpose

These procedures have been developed to provide guidance to all staff in implementing our Participant Money and Property policy. ICAS is committed to ensuring that the values, culture, diversity, and beliefs of a participant are identified and sensitively responded to.

These procedures provide guidance to staff to ensure that supports accessed by participants through ICAS promotes, upholds, and respects the legal and human rights of participants, including the rights of each participant to have and exercise their own values, culture, diversity, and beliefs. In accordance with our Person Centred Supports approach, ICAS will work with participants and their chosen supporters to ensure participants' culture, values, and beliefs are incorporated and practiced in the supports they receive.

This procedure should be read in conjunction with our [Participant Money and Property](#) policy.

A Person-Centred Approach at ICAS

ICAS is committed to a Person-Centred Approach in delivering supports to participants.

Person Centred Supports are central to our philosophy, our mission, and our business model.

Our Person-Centred approach means we will:

- Place participants at the centre of any planning and support process
- Allow participants to choose and direct the support they receive from us in accordance with their aspirations and goals
- Recognise the uniqueness of every participant
- Respect the identity of every participant
- Always focus on the strengths, contributions, and abilities of participants in all our interactions with them and their chosen supporters
- Recognise the participant's chosen supporters as partners
- Work with participants and chosen supporters to maximise personal connection, social participation, personal decision making, and independence.
- Ensure each participant's right to practice their culture, values, and beliefs while accessing supports is facilitated.

We will listen to participants and their chosen supporters in relation to how well we are doing in delivering person centred approaches. This means we will actively respond to their feedback and complaints relating to ensuring person centred approaches are incorporated in everything we do as an organisation.

We acknowledge the rights to self-determination, dignity, and respect for all people with disability, not only our participants.



Participant Money and Property

We recognise the importance of participants to exercise their rights to:

- Full access to, and control over, his/her/they own money.
- Their own personal possessions, and to use them as she/he/they see fit.

This means we will plan carefully with the participant and chosen supporters to ensure these rights can be realised. We recognise the dignity of risk for participants in owning, accessing, and using their own money.

Where we have access to a participant's money (for example, if we are undertaking shopping for a participant), we will ensure that it is managed, protected, and accounted for, and only ever used with the consent of the participant, and in accordance with the participant's wishes. The participant is always assumed to have capacity to make decisions in relation to their money and property.

We will ask the participant and (where relevant) his/her/their chosen supporter(s) at assessment if the participant has a substitute decision maker, and this will be noted on the participant's file.

In some cases, participants may need support to access and spend their own money as they determine. In these cases, we will use the least restrictive option to support the participant to achieve this goal. Further to this, wherever possible, active support practices will be used to assist the participant to develop skills to undertake these activities themselves.

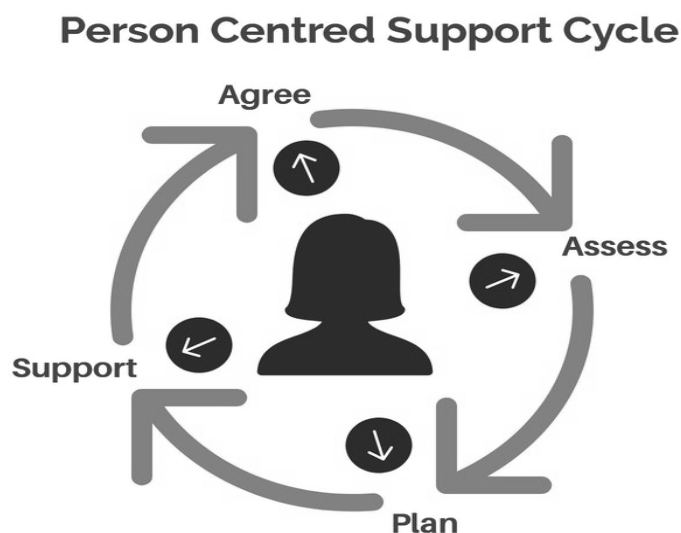
We will not, in any case, provide financial counselling, information, or advice to participants, apart from that which may be reasonably required in that participant's plan. For example, it may be appropriate to remind the participant that they will need to make a cash contribution for a community activity they are undertaking the next day. Should the participant require financial planning or financial counselling assistance, they can be supported to access Financial Counselling Australia, The Financial Planning Association, or the Association of Financial Advisors. Where the participant has a substitute decision maker for money matters, the participant will be supported as appropriate to advise the substitute decision maker of his/her/their wishes to seek financial counselling or financial planning assistance.

Processes for the management, protection, and accounting of Participant Money and Property to and from the provider are developed, applied, reviewed and communicated within ICAS, to participants, and to those who do business with us.



How will we do this?

We will apply our Person-Centred Approach in every interaction with our participants. As part of this process, participants are able to direct all elements of our Person-Centred Support Cycle in accordance with their culture, values, and beliefs.



Our Commitment to Participants

Participants are at the centre of every stage of our Service Agreement, Assessment, Support Planning, and Responsive Support Policy and Procedures.





1. Participant Money and Property in Service Agreements

When developing **Service Agreements** with participants we will:

- Ensure ICAS staff are appropriately trained in our Participant Money and Property Policy and procedures.
- Explain to participants and their chosen supporters, in language and formats best understood by them, our Participant Money and Property Policy and procedures.
- Explain to the participant the processes for money and property owned by participants in our organisation. That is, every participant is assumed to have capacity to manage their own money and property, unless they identify at assessment that they have a substitute decision maker for the purposes of money and property management. Ask the participant if they manage their own money and property, or whether they have a substitute decision maker (for example, The Guardianship Board) in place. Record on the participant's file.
- The participant's individual Plan Management approach will also be recorded: that is, self-managed, agency managed, or managed by a Plan Manager.
- In terms of financial advice or information that may be sought by a participant at the Service Agreement Meeting, ICAS staff will advise the participant that we do not provide specialist financial advice. However, we will advise that this can be discussed as an additional goal at the next NDIS planning review, or we can provide telephone numbers to industry associations to access specialist assistance if requested.
- Participants may identify that they need support to access and spend their money as they wish. This will be noted by ICAS staff for review at the next stage.
- Identify with the participant whether there may be out-of-pocket costs that may be required in achieving goals for which we are providing support. For example, a participant may join a social club that goes out weekly to a café for lunch, or to the cinema. Note this on file, in case the participant requires support to access and spend money for this purpose.
- Provide a copy of the Service Agreement to the participant in the mode, format, and communication style best understood by them, including any money or issues identified.
- Provide feedback to management in relation to Participant Money and Property Policy and procedures, including providing suggestions, ideas for review, and for communication.



2. Participant Money and Property in Assessment

When undertaking **Assessments** with participants for the delivery of supports, we will:

- Ensure ICAS staff are appropriately trained in Participant Money and Property Policy and procedures.
- Again explain to participants and their chosen supporters ICAS's approach to Participant Money and Property, in particular, our view that each participant has the capacity to manage their own money and property, unless we are advised by the participant and/or their chosen supporters (where appropriate) there are alternative arrangements in place (for example, a substitute decision maker/financial guardian).
- Review information provided by in the Service Agreement and on the participant's file in relation to money and property, including substitute decision makers in relation to property and money, and whether the participant manages their own plan/is agency managed/uses a Plan Manager. Confirm these details with the participant.
- Reviewing the service agreement, identify if and when supports are likely to touch upon participant money and property issues (for example, shared accommodation).
- Discuss with the participant whether they need support to access and spend their own money in ways they would like. For example, difficulties in accessing or using ATM facilities, which can be overcome with appropriate support planning. The least restrictive option should always be identified.
- If supports require any handling of participant money (for example, when undertaking shopping activities for a participant) the participant's agreement to ICAS's approach must be sought at assessment. ICAS's process is set out in Part 4 – *Responsive Support Delivery*.
- A risk assessment should be undertaken in terms of the participant's money and property. Each element should be confirmed with the participant and their chosen supporters (if appropriate).
- With the participant, work through potential mitigation strategies for risks identified in relation to their money and property, and document these to assist the support planning process.
- Provide feedback to management in relation to Participant Money and Property Policy and procedures, including providing suggestions, ideas for review, and for communication.



3. Participant Money and Property in Support Plan

When developing a **Support Plan** with a participant we will:

- Ensure ICAS staff are appropriately trained in our Participant Money and Property Policy and procedures.
- Explain to participants and their chosen supporters our Participant Money and Property Policy and procedures.
- Review the Service Agreement and Assessment undertaken within ICAS, including risks for participant money and property, and mitigation strategies.
- Work through ICAS's Support Planning process, seeking further detail from the participant/chosen supporters to assist in assessment, and to identify factors to assist the achievement of participant goals through support delivery or independence.
- Ensure all Participant Money and Property risks and strategies have been included as appropriate in the support plan.
- Advise participants that we have an obligation to ensure the supports we provide do not expose them to any kind of abuse or neglect, and this includes financial abuse (as outlined in our Violence, Abuse, Neglect, Exploitation, and Discrimination Policies and Procedures). If financial abuse is identified, it will be reported to the NDIS Quality and Safeguards Commission in accordance with our NDIS support provider responsibilities.
- Provide feedback to management in relation to Participant Money and Property Policy and procedures, including providing suggestions, ideas for review, and for communication.

4. Participant Money and Property Responsive Support Provision

In delivering **Responsive Supports** to participants we will:

- Ensure ICAS staff are appropriately trained in our Participant Money and Property Policy and procedures.
- Review the Service Agreement and Assessment undertaken within ICAS, including risks and mitigation strategies.
- Implement ICAS's Support Plan, noting that all risks and strategies relating to Participant Money and Property have been included as appropriate in the support plan.
- Ensure, in accordance with our organisation's commitment to the human rights of people with disability, that participants have the capacity to make decisions about their money and/or property. The only exception to this right is where a Financial Guardian or substitute decision maker is in place.
- As a general principle, ICAS attempts, as far as is possible, to not directly safekeep the money or property of participants. If money or property is found unattended, it is to be advised to the Director (date, time, item, amount – if relevant, where found) and locked in the ICAS's safe by the Finance Manager. When collected by the participant that owns the property/money, the collection of the item must be recorded with the participant's signature.



- In delivering supports to participants (and in any other contact with participants) personnel must not:
 - Borrow money from a participant
 - Loan money to a participant
 - Borrow or loan personal property to a participant
 - Give advice on financial matters
 - Have any other form of financial interaction with participants: for example, requesting a participant to be a guarantor for them.
- All of these behaviours are financial abuse and will be reported to the NDIS Quality and Safety Commission and, where appropriate, the police. Termination of employment on the basis of gross misconduct will also occur.
- Where a support includes the procuring of shopping or undertaking other activities that requires the worker to handle a participant's money:
 - This activity should only be undertaken if documented in the participant's support plan.
 - Where not documented in the support plan, the opportunity for a third independent party, family, or friend to undertake the task should be discussed with the participant.
 - Where cash is concerned – the amount of cash provided to the worker to handle should be documented, with specific details of the amounts spent. The support worker should provide the receipts and any unspent cash back to the participant or third party/family/friend at the completion of the activity.
 - Where money is provided in a card form (credit card/debit card) – the support worker should not have access to the pin number as most card forms are able to be tapped up to a limit of \$100. If the support worker utilises the card payment on behalf of the participant, receipts should always be retained and details of purchases documented.
 - Where this is not possible, the support worker should contact the Quality Assurance Officer immediately for advice.
- Where a support includes the procuring of shopping or undertaking other activities requiring the worker to handle a participant's money because the participant has significant mobility issues and cannot attend:
 - A cash book for each participant has to be kept on site (for example, at the participant's home)
 - The amount given to the worker by the participant must be recorded in the cash-book, including date and time, and signed by the participant.
 - All receipts and change given must be included in the cash-book, along with date and time, and signed again by the participant.
 - All transactions must be recorded in the support worker's notes.
 - The Quality Assurance Officer will conduct random audits of participant cash books and worker's notes to ensure alignment.
- Should support be required to assist a participant to access and spend their money in accordance with their directions, the support undertaken to assist the participant to do this must match the support identified in the participant's support plan.



- Provide feedback to management in relation to Participant Money and Property Policy and procedures, including providing suggestions, ideas for review, and for communication.

Related documents/resources

Applicable NDIS Practice Standards Policies and Procedures

- **Participant Money and Property**
- Person-Centred
- Individual Values and Beliefs
- Privacy and Dignity
- Independence and Informed Choice
- Violence, Abuse, Neglect, Exploitation and Discrimination
- Access to Supports
- Support Planning
- Service agreement with participants
- Responsive Service Provision
- Person-Centred Supports
- Feedback and Complaints
- Incident Management
- Risk Management
- Easy English-Keeping Safe

Applicable Forms / Registers

- Support Plan
- Feedback & Complaints Register
- Incident Register
- Feedback & Complaint Form
- Risk Identification Form
- Risk Register
- Individual Risk Assessment Form

Applicable Legislation and NDIS requirements

- [National Disability Insurance Scheme \(Quality Indicators\) Guidelines 2018 \(Cth\)](#)
- [NDIS Code of Conduct](#)