



Financial Management Policies & Procedures

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FINANCIAL MANAGEMENT / PERSONAL FINANCES

Scope

This Policy applies to all 123 Support Services Participants and staff members.

Purpose

123 Support Services has been entrusted with public and private funds to fulfil its mission of assisting Participants with Plan Management in accordance with NDIS. In carrying out activities to support its mission, 123 Support Services must comply with specific financial administration, accounting, control, management, audit, and reporting requirements, as specified in legislation and by various government and auditing agencies.

To assist 123 Support Services to meet these requirements, this policy and a series of detailed procedures have been developed. Their purpose is to ensure that 123 Support Services funds and resources are used only for 123 Support Services and Participant purposes, and that appropriate financial controls are developed, documented, and applied to prevent the abuse or misuse of NDIS funds and other resources. This policy sets out the principles of financial management which underpin all financial activities undertaken by, and within, 123 Support Services.

Policy Principles

No NDIS funds may be committed or expended except by approval of a 123 Support Services staff member with documented authority to approve, in accordance with 123 Support Services' financial delegations. Where a financial delegate has a direct or personal interest in a transaction, neither the delegate, nor any other delegate who reports to him or her, may approve that transaction. Use of NDIS funds must only be expended on goods and services for approved NDIS purposes.

All tendering and procurement activity, including the use of 123 Support Services preferred suppliers, must be compliant with the Procurement Procedures. Funds from external sources tied to particular purposes, such as grant funds, must be used only for the specified purposes.

All items purchased from 123 Support Services funds are the property of 123 Support Services, unless there is an agreement in writing to the contrary associated with a particular grant or contract. Where there is a tangible asset from an agreement or service purchased with 123 Support Services funds, e.g. a report or model, that asset is the sole property of 123 Support Services, unless there is an agreement in writing to the contrary at the time the service was engaged.

Assets

All 123 Support Services assets, however acquired, must be prudently managed and properly documented to meet accounting, regulatory, reporting and compliance requirements and properly accounted for, in approved asset registers, where required by the Financial Management of Assets Procedure.

Financial records

All financial transactions must be properly documented and accurately recorded in a timely manner and in accordance with 123 Support Services policies, procedures, and business processes. It is an offence under anti-bribery legislation to falsify accounting documents (including altering, concealing, or destroying financial records or failure to make or amend an accounting document) either intentionally or unintentionally, to facilitate or disguise illegitimate financial transactions.

Integrity

All staff members of 123 Support Services community are to act in an ethical and honest manner in all aspects of procurement and financial expenditure involving NDIS and 123 Support Services funds.

Care and use of 123 Support Services property

All users of 123 Support Services property must:

1. treat 123 Support Services property with care and consideration, in accordance with accepted community standards,
2. use 123 Support Services property for 123 Support Services purposes only, and in accordance with manufacturers' instructions, safe work practices and any relevant 123 Support Services procedures, and
3. take reasonable steps to ensure 123 Support Services property is appropriately secure from damage, theft, or misappropriation.

Policy Context

123 Support Services 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 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.

123 Support Services 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.

Consent

In the first instance, assumes that everyone has the capacity to make their own decisions. However, where staff are concerned that a client may lack the capacity to look after their own money, 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.

123 Support Services 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.

Responsibilities

The specific responsibilities of clients / their Authorised Decision Maker, 123 Support Services staff, volunteers and contractors in relation to supporting clients' money and property are set out in the following table:

Position Title	Responsibilities
Clients and / or their Authorised Decision Maker	<ul style="list-style-type: none">• Advise 123 Support Services if support is required to assist a client to store, access and spend their own money.• Determine the best way 123 Support Services can provide this support to ensure that the client / their guardian / Authorised Decision Maker determines how money is accessed and spent.• Work with 123 Support Services to develop a safeguarding mechanism to account for money stored and spent.• Ensure all money spent during the course of 123 Support Services delivering supports and services is accounted for in the client's personal banking records.• Raise any financial discrepancies with 123 Support Services promptly to enable effective investigation of the concerns raised.
Disability Support Worker, Volunteer and Contractor	<ul style="list-style-type: none">• 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.
Key Worker / Case Manager	<ul style="list-style-type: none">• If required, ensure the safe storage of the client's money where 123 Support Services has been requested to provide this support.• If required, ensure clients determine how they spend their own money and that 123 Support Services does not provide financial advice or information other than that which would reasonably be required.• Oversee access to client funds by employees.
Coordinator / House Supervisor / Front Line Supervisor / Team Leader	<ul style="list-style-type: none">• Identify clients' needs regarding accessing, storing and spending their own money and oversee staff, volunteer and contractor involvement.• Support and direct staff, volunteers and contractors providing assistance with client money and finances.
Operations Manager / Regional Director	<ul style="list-style-type: none">• Ensure that each service facility has appropriate money holding and recordkeeping systems in place in respect of clients' money.

Planning and Budgets

123 Support Services 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 123 Support Services, where 123 Support Services provide support for a client to store, access and spend their own money

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.

123 Support Services 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.

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.

All incidents of fraud will be reported to the relevant state Police department. For more information, please refer to the Fraud Prevention Guideline.

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.

Further Advice or Assistance

Further advice and information can be obtained from the:

» 123 Support Services' Administration Officer:

- by phoning: 07 4361 6848;
- by emailing: admin@123supports.com

Effectiveness and Review

The Director will review this Policy and Procedures document each 12 months on the anniversary of its approval.