

## **FINANCES OF PEOPLE SUPPORTED**

Community Living-Central Huron is committed to ensuring people supported are provided with individualized assistance with managing their own personal finances. Informed Consent must first be obtained from the person supported or legal guardian, prior to any assistance being provided. Assistance may include obtaining funds, budgeting, monitoring finances, support with purchases, recording, paying bills and trusteeships. When a Staff assumes responsibility for a person's supported finances, they do so with the understanding that the person's funds are spent in a manner that is consistent with the Individual Support Plan to enable persons supported to direct their own services and supports in a personalized way. Further, when a Staff has a dual signature or joint signature bank account with a person supported, the Staff member does so with the full understanding and agreement that all funds belong solely to the person supported and the Staff has no entitlement to any funds at any time, including but not limited to bequests. Non-compliance with this policy and the detailed procedures, "Record Keeping and Financial Accountability of Persons' Supported Finances," is subject to discipline up to and including dismissal.

The following practices are included in a detailed procedure "Record Keeping and Financial Accountability of Persons' Supported Finances":

- Persons supported must give consent prior to the Agency providing assistance with banking and financial matters;
- Full-Time and Part-Time Support Workers, as directed by their Supervisor, may have the responsibility of assisting a designated person(s) supported with financial record keeping; including individual ledgers and banking records. All discrepancies will be immediately reported to the Supervisor;
- all transactions must be documented, noting the specific of the debit and/or credit; receipts are expected to be obtained, whenever possible and are required for all purchases made with Staff assistance;
- the relevant Supervisor will reconcile banking records on a monthly basis and immediately report any concerns to the Coordinator, Adult Services. The Coordinator, Adult Services, will provide a report annually to the relevant Committee(s), as confirmation that an independent review of a person's supported finances has been conducted.
- Staff will not borrow money or engage in any personal financial transactions with persons supported;
- Staff will not accept or obtain any benefit for themselves when assisting people supported with their finances. More specifically, Staff will not utilize a personal "points card", receive a credit voucher, etc., when assisting supported individuals;
- CL-CH Administration Staff will conduct an independent annual review/audit of the accounts of persons' supported by residential services and the SIL Program, as appropriate. The appropriateness to be determined by the level of Staff involvement;
- Persons supported will be provided with information on various banking services/options, such as direct deposit, daily limits, automatic transfers from individual accounts to the house account.

The Agency requires Support Workers to administer the finances of persons supported in a respectful, efficient and responsive manner.

## **Procedures for Record Keeping and Financial Accountability of Persons' Supported Finances**

### **Review of Policy:**

Community Living-Central Huron (CL-CH) believes the health, safety and well being of persons supported is of primary concern, with one such area being finances. Therefore, CL-CH has developed policies and procedures to address the area of finances.

### **Finances of Persons Supported:**

The level and type of support required to assist persons supported to manage their financial resources must be discussed and agreed upon by the person supported or legal guardian. As per the Individualized Support Plan, input may come from the person supported, family, internal and external service providers, including the relevant Supervisor and Coordinator. Persons supported are responsible for all of their own expenses from their own income. The designated Support Worker, which may include the Supervisor or Coordinator, may assist with budgeting, financial planning, accounting of the person's supported finances, pursuing other options related to income, investigating bank account features, assuming the role of trustee, and ensuring all transactions are recorded accurately, as per the Agency's policy and procedures. Agency Staff will not borrow money, nor engage in any personal financial transactions with persons receiving support. Staff will not accept or benefit personally from any bonus offers, promotions, points cards, gift certificates, credit vouchers, etc., when assisting persons supported to make purchases/with their finances. Further, Agency Staff will not initiate or promote the giving of gifts from persons supported to Staff. An annual independent review of all account ledgers/transaction registers will be conducted by a third party followed by a report from the Coordinator, Adult Services to the relevant Committee and Board of Directors upon completion of the review.

Failure to abide by the Agency's Finances of People Supported Policy and Record Keeping and Financial Accountability of Individuals' Finances procedures, will result in disciplinary action, up to and including dismissal.

### **Income of Persons Supported:**

Persons who receive support have various sources of income. Examples of sources of income are as follows:

- Ontario Disability Support Program (ODSP)
- Old Age Security
- Guaranteed Annual Income System (GAINS)
- Employment Income
- Ontario Works
- Inheritance/Trusts
- Canada Pension Plan

### **Personal Identification Numbers (PINs), Passwords and Security Questions:**

With the majority of financial institutions, possessing a banking/debit card is a requirement to have a bank account. Therefore, partaking in online banking and the use of Automated Teller Machines (ATMs) may be necessary. Should Staff assistance be required for the use of a banking/debit card, online banking and/or ATM's, the person supported or legal guardian must consent to the designated Support Worker (s) having knowledge of the PINs, Passwords and Security Questions and access to said bank accounts. The relevant Supervisor will also keep a confidential record of PINs, Passwords and Security Questions, as well, a sealed copy kept in the Agency's safe at the Central

Administration building. The Designated Support Worker (s) privy to Passwords, PINs and Security Questions will store said Passwords, PINs and Security Questions in a secure, Supervisor pre-approved location. The Supervisor will record the aforementioned location in the designated Support Worker (s) file (s) retained by the Supervisor.

Use of banking/debit cards to withdraw funds via an ATM is discouraged with individuals who require staff assistance, as both the person supported and Support Worker (s) are put in a vulnerable position. Accessing funds, in person, by going into the relevant financial institution with the person supported is preferred, when Staff assistance is required. A printed record of the transaction from the financial institution is required to be obtained and placed in the relevant account ledger/transaction register for each Staff supported transaction. The relevant Staff member will initial such printed record.

When the use of Passwords, PINs and Security Questions are necessary for any given banking transaction, and Staff assistance is required, the designated Support Worker (s) will provide such assistance, document and initial said transactions in the account ledger/transaction register.

### **Dual Signature Accounts:**

Persons supported have the option of having a dual signature account(s) with their designated Support Worker. The dual signature bank account option is voluntary and is typically of an educational nature and/or as an additional security measure for the person supported. The designated Support Worker is required to submit a completed Consent for Dual Signature Bank Account form to the appropriate financial institution when setting up the dual signature account. A copy will also be placed in the person's supported file, as well as forwarded to the relevant Supervisor and Coordinator.

### **General Responsibilities:**

- Receipts are required for all purchases made with Staff assistance and whenever possible when Staff assistance does not occur.
- Cash amounts locked in a person's home will require recording of all transactions, noting the specifics of the debit/credit, date of the transaction and the balance. The written balance must be the same as the cash balance.
- Cash amounts locked in a person's home will be counted at the beginning of each day shift and the end of each evening shift, with the Staff initialing said process.
- All discrepancies will be immediately reported and reviewed with the relevant Supervisor or designate. Should there be any concerns or ongoing discrepancies with the cash count balances, further safeguards or other measures as determined by the Supervisor or designate will be implemented, such as cash counting at the beginning and end of every shift.
- For the protection of individuals supported, staff will encourage setting a daily maximum limit on the amount of funds that can be accessed with bank/debit cards.
- Discussions and agreement with the person supported must occur for all Staff supported purchases/transactions and banking services/options.

### **Designated Support Worker Responsibilities:**

- All bank transactions, including cheques, deposits, ATM deposits/withdrawals, interest, and service charges, must be recorded in the person's supported account ledger/transaction register, noting the specifics of the debit/credit. The ledger/register is to balance with the person's supported financial institution's balance, as per the monthly bank statement.
- All entries made to the person's supported ledger/register will be made in pen and white out will

not be used. The date will be recorded for each entry. Pages will not be removed from persons' supported ledgers/registers.

- When the financial institution does not provide for bank books, the ledger/register will be used, as noted along with the monthly bank statement. The designated Support Worker (s) will confirm the accuracy of the person's supported bank records at a minimum of monthly.
- Deposits will not be pre-recorded; confirmation of a deposit must occur prior to recording, to ensure the deposit has taken place for balance accuracy.
- Only automatic withdrawals, such as post dated rent cheques and automatic billings where a specific/actual amount has been pre-determined, can be pre-recorded in the ledger/register prior to the date of the transaction occurring (the actual date the debit is to occur will be noted/specified).
- The person's supported bank account(s) will be monitored regularly to ensure the allowable asset amount, if applicable, is not exceeded.
- Fulfill the responsibilities of the trustee, as per ODSP requirements, if applicable.
- Be familiar with the relevant guidelines, requirements which accompany the person's supported source(s) of income.
- All persons supported who require safekeeping of cash or any other financial item shall have such item(s) kept in a locked location in their home. Keys to the locked location will be limited amongst the Staff and determined by the relevant Supervisor. The relevant Supervisor will keep a spare key.
- The designated Support Worker(s) and location Supervisor will have sole possession of any Personal Identification Numbers (PINs), Passwords and Security Questions for relevant bank accounts and debit cards with a copy of said PINs, Passwords and Security Questions being kept in a sealed envelope in the Agency's safe at Central Administration building.
- A limited supply of pre-signed cheques and/or withdrawal slips will be left at the work locations and will bear only one signature, the Staff signature, until the time of cashing/depositing.
- When there is more than one designated worker on an account (ie. House Account), the balancing of the account will be rotated on a monthly basis amongst the designated workers.
- All pre-authorized bill payments and deposits will be listed in the account ledger/register for easy reference.
- When recording errors made by Staff create an overdraft situation for the person supported, Staff will repay the person supported for the entire cost of the overdraft expense.
- The designated worker(s) will rotate, on a monthly basis, the responsibility of ensuring there is available petty cash (not to exceed \$50.00), if applicable at the work location,

### **Supervisor Responsibilities:**

- The relevant Supervisor will maintain an up-to-date list of all dual signature accounts for persons supported within their Team.
- The relevant Supervisor will maintain an up-to-date list of all PINs, Passwords and Security Questions specifying the bank account (s) and/or debit card (s), as appropriate and the names of the person (s) supported and the designated Staff who have knowledge and access to the accompanying PINs, Passwords and Security Questions.
- The relevant Supervisor will ensure the designated Support Workers store PINs, Passwords and Security Questions in secure locations and will record said locations in the Support Workers file kept by the Supervisor.
- All discrepancies will be reported in writing to the Coordinator.
- The relevant Supervisor will review all account ledgers/transaction registers, within their Team, on a monthly basis, which includes bank accounts, cash, all banking transactions, online banking, petty cash and ensuring any over-draft expense caused by the Support Worker is promptly repaid.

- When a designated Support Worker temporarily vacates their position, the Supervisor, in consultation with the Coordinator, will determine if the Support Worker's name will be removed from all dual signature accounts for leaves of absence, such as: maternity/parental leaves, short term and long term disability leaves, WSIB leaves.
- The Supervisor will ensure for all departures of employment, the designated Support Workers' name will be removed from all dual signature accounts as soon as possible.
- On an annual basis, the relevant Supervisor will ensure an independent review of all eligible account ledgers/transaction registers is conducted by a third party and reported to the Coordinator, Adult Services.
- All pertinent information resulting from the third party review will be shared with work location Staff.

**Administration Staff Responsibilities:**

- Conduct an annual audit/review of all bank accounts, investments, expenditures, record books, petty cash vouchers, ATM transactions, online transactions and any other financial records of eligible persons supported by residential services and SIL (as appropriate).
- Provide a written summary of the annual audit to the relevant Supervisor and copy to the Coordinator, Adult Services and Executive Director.

**Petty Cash Guidelines:**

- For residential locations, the amount of Petty Cash should be limited to a maximum of \$50. (Fifty dollars). Typically, the purpose of Petty Cash is to purchase lower cost, incidental house items, shared by all persons supported within the home, when unable to go to the bank or the item is required in a prompt manner.
- For residential locations, Petty Cash will come from the House Account or equally from the persons' supported personal accounts.
- Receipts are required for all purchases.
- All transactions will be recorded in the account ledger/transaction register, noting the specific debit/credit, date of the transaction and the balance. The written balance must be the same as the cash balance.
- Petty Cash will be counted at the beginning and end of every shift, with the Staff initialling the ledger/register each time.
- Discrepancies will be reported immediately and reviewed with the Supervisor or designate.

**Related Policies:**

- Vision, Mission and Service Principles (A-001)
- Guiding Principles (A-002)
- Confidentiality (A-003)
- Privacy (A-004)
- Social Media and Agency Equipment Usage Policy (B-006)
- Volunteer (B-007)
- Purchasing and Credit (B-008)
- Duty of Care Policy (B-010)
- Code of Conduct (B-011)
- Individual Welfare and Rights (C-001)
- Complaint/Feedback Policy and Procedures for Persons Supported (C-003)
- Abuse (C-004)
- Serious Occurrence (C-006)

- Communication Book (C-007)
- Individual Support Policy for Persons Receiving Service (C-009)
- Orientation for People Supported (C-011)
- Inventory, Personal Belongings of Persons Supported (C-013)
- Relationship with Law Enforcement Agencies (C-017)
- Emergency Policy (D-003)
- Bullying, Harassment and Workplace Violence Policy and Procedures (D-007)
- Preventative Maintenance Policy (D-009)
- Police Record Check, Vulnerable Sector Check Policy (E-003)
- Employee and Volunteer Orientation Policy (E-005)
- Professional Development/Training Policy (E-006)
- Individual Consultation (E-007)
- Employee Performance Appraisal (E-008)
- Employee Performance Standards (E-011)
- Disciplinary Policy (E-012)
- Record Retention and Archives (E-018)