Social Services Department
Falkland Islands Government

Supporting Clients to Manage Finances Policy

Version control

Number	Date (most recent at top)	Author	Notes
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1. Purpose

Social Services is committed to supporting adults who require assistance to manage their personal finances in a lawful, transparent, proportionate, and accountable manner. This policy and procedure outlines the governance framework to safeguard service user finances and to protect employees from allegations of misuse, abuse, or misconduct.

2. Scope

This policy applies to all employees, agency workers, and volunteers within Health and Social Services who provide direct or indirect support to clients with managing their money, benefits, banking, purchasing, or budgeting activities.

Where a court order is in place (such as a Receivership), it must be adhered to. This policy outlines how employees, managers, and Social Services will work together to ensure the client's finances are managed appropriately notwithstanding compliance with any legal requirements.

3. Legal and Policy Framework

This policy is informed by the Assessment and Safeguarding of Adults Ordinance 2020, Mental Capacity in the Falkland Islands Policy, Care and Support Statutory Guidance, Safeguarding Adults Procedures and Guidance, FIG Financial Regulations, Anti-Fraud and Corruption Policies, and the Management Code / Code of Conduct.

4. Principles

All financial support must be delivered in line with the following principles:

- **Client autonomy** – Clients make decisions wherever they have capacity and support is given to assist clients to have input wherever possible.
- **Least restrictive practice** – Support should be no more intrusive than necessary.
- **Transparency** – All actions must be open, recorded, and auditable.
- **Separation of duties** – No individual should control finances without oversight.
- **Safeguarding** – Financial abuse is a safeguarding concern.
- **Professional boundaries** – Staff must avoid conflicts of interest.

5. Roles and Responsibilities

We all have a role to play in ensuring that client's finances are well managed.

Employees must:

- Act only within authorised arrangements.
- Follow procedures exactly or raise with the appropriate manager where this is not possible so that clear decisions can be recorded.
- Maintain accurate, contemporaneous records.
- Never mix client money with personal funds.
- Raise any safeguarding concerns should they arise without delay.

Managers

- Approve appropriate financial support arrangements.
- Ensure staff are trained and supervised to undertake this role.
- Conduct regular checks and reviews of client finances.
- Act immediately on concerns or discrepancies.

Social Services will:

- Provide secure systems, templates, and training.
- Maintain audit and review processes.
- Support staff who raise concerns in good faith.

6. Procedure

6.1 Identifying the Need for Financial Support

Where concerns are identified regarding a client's ability to manage finances, these must be explored as part of an assessment or review. Consideration must be given to their capacity, risk of financial abuse, and the least restrictive options.

Financial support may only be provided where:

- There is a documented assessed need identifying that a client requires support to manage their finances.
- The level of support is formally agreed and recorded.
- The arrangement is time-limited and reviewed.
- There is no next of kin or friend willing or able to manage the individual's finances.

6.2 Capacity, Consent, and Best-Interest Decisions

Capacity to manage finances must be assessed in line with the Mental Capacity Policy. Where a client has capacity, informed consent must be obtained and recorded. Where capacity is lacking, a best-interest decision must be documented, including consideration of less restrictive alternatives and appropriate consultation.

6.3 Arrangements and authorisation

Before any financial management begins whether this is voluntary (and authorised by the client) or as a result of a best interests decision the following must be completed:

- A **Client Financial Support Arrangement.**
- The agreement must specify:
    - What support is to be provided
    - Spending limits (if any)
    - Duration of the arrangement and frequency of reviews
    - Recording method outlined.

- Client consent must be documented (or best interest decision recorded)
- The above must be authorised by a manager and added to the client's record on the social services case management system.
- Where a Court Order is in place, the arrangements should align with the Court directions.

6.4 Permitted Financial Activities

Authorised staff may undertake permitted activities to support an individual to manage their finances. Clients must be involved in decisions wherever practicable. Where this isn't possible that should be a risk assessment to support decision making.

Permitted activities include:

- Budgeting support and financial guidance.
- Supporting clients to withdraw cash with them present.
- Supporting purchases (e.g. food, utilities, essential items).
- Safekeeping small amounts of cash of up to £100 (where authorised).

6.5 Prohibited Activities

Staff must always exercise caution when managing a client's finances.

Employees must **not**:

- Use personal bank accounts for client money.
- Mix personal and client funds/purchases.
- Lend to or borrow money from clients.
- Accept any gifts in cash, tips, or loans related to providing financial support. If a client wishes to provide a physical gift, this can only be accepted in line with the gift policy (value less than £25) and must be reported to the appropriate manager and documented on the client's financial file. Should any concerns arise around gifts, the appropriate manager will discuss with the client and may make amendments to the financial support arrangements as required.
- Be named on client bank accounts or cards.
- Make financial decisions without client involvement (unless legally authorised to do so).
- Act beyond agreed arrangements.

Any breach may result in disciplinary action.

6.6 Handling Cash and Purchases

Cash Handling Rules

- Cash withdrawals should occur with the client present wherever possible.
- Receipts must be obtained for **all purchases**.

- Cash holdings should be minimal and time-limited.
- Two signatures are required where thresholds are exceeded. The second signature must be a manager’s.

Shopping and Payments

- Written or recorded client instruction must be obtained.
- Itemised receipts must be kept.
- Change must be returned promptly and recorded.

6.7 Recording and Documentation

Accurate records are essential for governance and staff protection.

All staff must:

- Record all financial transactions on the same day.
- Use approved templates/systems.
- Attach receipts, bank slips, and authorisations.
- Clearly note client involvement and consent.
- Reconcile accounts on a monthly basis and have these countersigned by a second person.

Records are subject to:

- Monthly managerial review.
- Internal audit if concerns/irregularities are suspected/identified as per the Anti-Corruption and Fraud Policy
- Safeguarding review if criteria is met.

6.8 Monitoring, Review, and Audit

Managers must conduct monthly reviews and spot checks of financial records. Any discrepancies or concerns must be investigated immediately in accordance with the Anti-Corruption and Fraud Policy. Findings and actions must be recorded, and learning applied to practice.

Oversight protects **both clients and staff.**

6.9 Safeguarding and Allegations

Any concerns must be reported immediately including:

- Missing funds

- Unexpected changes in client finances
- Client distress or concerns about money
- Allegations against staff

Social Services will:

- Treat concerns seriously and proportionately
- Support staff through a fair investigative process
- Apply safeguarding and whistleblowing procedures where appropriate

6.10 Ending Financial Support Arrangements

Financial support must end when it is no longer required, when risks change, or when formal arrangements such as Receivership are implemented. Closure must be documented, records reconciled, and the client informed.

7. Training and Competency

All relevant staff must receive training on:

- Financial safeguarding
- Record keeping and governance
- Professional boundaries / conflicts of interest
- Capacity and consent

Refresher training should occur regularly.

8. Policy Review

This policy and procedure will be reviewed annually or earlier in response to legislative change, audit findings, or serious incidents.