

## Client Money and Property Policy

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### 1. Introduction

#### 1.1 Purpose

This Policy and the Policies and Procedures and related documentation set out in section 1.5 below (**Related Documentation**) supports Centre for Inclusive Supports to apply the Participant Money and Property NDIS Practice Standard.

#### 1.2 Policy Aims

Centre for Inclusive Supports is committed to ensuring that participant money and property is secure and each participant uses their own money and property as they determine.

#### 1.3 NDIS Quality Indicators

In this regard, Centre for Inclusive Supports aims to demonstrate each of the following quality indicators through the application of this Policy and the relevant systems, procedures, workflows and other strategies referred to in this Policy and the Related Documentation:

- (a) Where the provider has access to a participant's money or other property, processes to ensure that it is managed, protected and accounted for are developed, applied, reviewed and communicated. Participants' money or other property is only used with the consent of the participant and for the purposes intended by the participant.
- (b) If required, each participant is supported to access and spend their own money as the participant determines.
- (c) Participants are not given financial advice or information other than that which would reasonably be required under the participant's plan.

#### 1.4 Scope

- (a) This Policy applies to the provision of all services and supports at Centre for Inclusive Supports.
- (b) All permanent, fixed term and casual staff, contractors and volunteers are required to take full responsibility for ensuring full understanding of the commitments outlined in this Policy.
- (c) The relevant persons specified in the column corresponding to a procedure described in this Policy have the responsibility to implement the relevant systems, procedures, workflows and other strategies referred to in the relevant procedure.

#### 1.5 Related Documentation

The application of the above NDIS Practice Standard by Centre for Inclusive Supports is supported in part by and should be read alongside the Policies and Procedures and related documentation corresponding to this Policy in the Policy Register.

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## 2. Definitions

**Centre for Inclusive Supports** means Centre for Inclusive Supports Inc. ABN 13 517 649 640.

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**Client** means a client of Centre for Inclusive Supports (including an NDIS participant).

**Key Management Personnel** means Lenka Boorer, Kylie Power, Mary (Catherine) Grealy, David Byrne, Kathy Harris. and other key management personnel involved in Centre for Inclusive Supports from time to time.

**Legislation Register** means the register of legislation, regulations, rules and guidelines maintained by Centre for Inclusive Supports.

**Policy Register** means the register of policies of Centre for Inclusive Supports.

**Principal** means Lenka Boorer.

**Related Documentation** has the meaning given to that term in section 1.1.

**Worker** means a permanent, fixed term or casual member of staff, a contractor or volunteer employed or otherwise engaged by Centre for Inclusive Supports and includes the Principal.

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### 3. Policy Statement

- (a) Centre for Inclusive Supports will treat personal financial information and details of Clients confidentiality in accordance with our Privacy and Dignity Policy.
- (b) Centre for Inclusive Supports will only use Client money or other property with the consent of the Client and for the purposes intended by the Client.
- (c) If Centre for Inclusive Supports has access to the money or property of a Client, Centre for Inclusive Supports will:
  - (1) encourage the Client to take responsibility and ownership of their own money and property.
  - (2) encourage the Client to access and spend money in a responsible manner but ultimately, as determined by the Client (except where a purchase or expenditure will endanger their safety, the safety of others or is illegal).
  - (3) without limiting the Client's rights of self determination, choice and control with respect to their money and property, ensure Workers refer to the Principal any concerns with respect to misuse or inappropriate spending of money.
  - (4) ensure Centre for Inclusive Supports monitors the changing support needs of Clients with respect to financial and property matters.
  - (5) make every effort to ensure that Clients carry and store money, credit cards and debit cards safely.
  - (6) make every effort to ensure safe storage of Clients property and valuables.
- (d) Centre for Inclusive Supports will ensure that the Preventing and Responding to Violence, Abuse, Neglect, Exploitation and Discrimination Policy where it appears they are subject to any form of financial abuse.

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- (e) Centre for Inclusive Supports must not under any circumstances borrow, take or accept gifts of money from Clients.
- (f) Centre for Inclusive Supports is not qualified to and must not give financial or investment advice to its Clients.

#### 4. Procedure

The Policy is supported by the following Procedures which are intended to clarify the responsibilities of the board, Principal, Key Management Personnel and other Workers and make explicit the underlying principles of the Policy. The Procedures work together dynamically and are relevant to all parts of Centre for Inclusive Supports. The Procedures are not ordered in priority and all are important to achieving the aims of the Policy Statement.

Procedure	Responsibility
<p><b>4.1 Identifying whether support is required to manage Client's money and property and obtaining consent to do so</b></p> <p>If during initial meetings or during the support planning process it is deemed that the Client needs support to manage their money and property, ensure that:</p> <ul style="list-style-type: none"> <li>(a) The Client has provided their written consent to use the Client's money and property and has specified the relevant purposes where Centre for Inclusive Supports's support is required.</li> <li>(b) A written record of the Client's valuables/property is made and kept on the Client's information file. This record must be signed by the Principal.</li> </ul>	<p><b>Principal</b></p>
<p><b>4.2 Promote a culture of responsible money management</b></p> <p>If Centre for Inclusive Supports has access to the money or property of a Client, Centre for Inclusive Supports will:</p> <ul style="list-style-type: none"> <li>(a) encourage the Client to take responsibility and ownership of their own money and property.</li> <li>(b) advocate for Clients with a view to ensuring that they can enjoy the full benefit of all income to which they are entitled. Income includes all forms of benefit/income to which a Client is entitled including under the NDIS.</li> <li>(c) encourage the Client to access and spend money in a responsible manner but ultimately, as determined by the Client (except where a purchase or expenditure will endanger their safety, the safety of others or is illegal). If a Client has the capacity, training and understanding they should be free to decide for themselves the purposes for which they spend their money.</li> <li>(d) without limiting the Client's rights of self determination, choice and control with respect to their money and property, ensure Workers refer to the Principal any concerns with respect to misuse or inappropriate spending of money.</li> </ul>	<p><b>All Workers</b></p>

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Procedure	Responsibility
<p><b>4.3 Record keeping to ensure Client money is managed, protected and accounted for</b></p> <p>Where a Client is deemed to need support with money and has provided their consent to Centre for Inclusive Supports providing such support, Centre for Inclusive Supports will:</p> <ul style="list-style-type: none"> <li>(a) when supervising, working with or providing services and supports to a Client and to the extent practicable, keep a clear written record of all purchases or other financial transactions that occur using the Client's money.</li> <li>(a) ensure that all bank documents, cheque books, credit cards, debit cards and other ATM cards are kept secure.</li> <li>(b) maintain, sign and prepare receipts as necessary for all expenditure on behalf of a Client.</li> <li>(c) maintain confidentiality and compliance with the Centre for Inclusive Supports Privacy and Dignity Policy.</li> </ul>	<p><b>All Workers</b></p>
<p><b>4.4 Access to sensitive financial information and Client money</b></p> <ul style="list-style-type: none"> <li>(a) ATM, debit and credit cards can be very useful. However, cards operated in conjunction with PINs present particular problems concerning Client security and Centre for Inclusive Supports's access to a Client's money. In supporting Clients, Workers must consider and weigh up Client rights and freedoms against security and Centre for Inclusive Supports's duty to the Client.</li> <li>(b) Where a Client is capable of understanding and managing their own money they must be facilitated to do so. Workers must not know/ask for PIN numbers, passwords or other security controls on Client accounts in this situation, except as otherwise permitted by this Policy including the circumstances set out below.</li> <li>(c) Where a Client has been assessed as requiring some training/support for a short period before they will be able to manage their own money/accounts then Workers may facilitate such training by way of knowing the PIN or other security controls for a Client account provided all of the following conditions are met:           <ul style="list-style-type: none"> <li>(7) Consent for the money management training must be a specific purpose for which the Client has provided their written consent under section 4.1.</li> <li>(8) The training period cannot extend beyond six months after which time               <ul style="list-style-type: none"> <li>(A) The Client must change all PIN's or security controls and operate independently or,</li> </ul> </li> </ul> </li> </ul>	<p><b>All Workers</b></p>

Procedure	Responsibility
<p>(B) The cards must be cancelled and staff support the Client without the use of ATM/credit/debit cards.</p> <p>(C) Centre for Inclusive Supports otherwise complies with its other obligations under this Policy including with respect to record keeping.</p>	
<p><b>4.5 Payments for services provided by Centre for Inclusive Supports</b></p> <p>Payments to Centre for Inclusive Supports for services and support provided are strictly in accordance with and subject to the requirements of the Client's Service Agreement and applicable NDIS legislation and rules.</p>	<b>All Workers</b>
<p><b>4.6 Providing access to advocacy</b></p> <p>Encourage and support Clients to access legal or advocacy services where allegations of financial abuse or exploitation have been made.</p>	<b>All Workers</b>
<p><b>4.7 Preventing and identifying financial abuse and exploitation</b></p> <p>(a) Actively prevent and where possible eliminate any risk of financial abuse or exploitation by looking out for the indicators of financial abuse set out in the Preventing and Responding to Violence, Abuse, Neglect, Exploitation and Discrimination Policy and this schedule.</p> <p>(b) Report and respond to any risk of financial abuse or exploitation in accordance with our Incident Management and Reporting Policy.</p> <p>(c) Respond quickly and sensitively when any breach of our Client's property rights occurs as a result of the acts of Centre for Inclusive Supports's Workers, immediately acting to stop such behaviours.</p> <p>(d) Proactively support a Client, to the limits of our expertise and resources, in circumstances where the Worker suspects financial abuse or exploitation perpetrated by others.</p> <p>(e) Offer support to Centre for Inclusive Supports Clients, their family and carers when they tell us about any financial abuse or exploitation so that we can fully understand and respond effectively.</p> <p>(f) Ensure there is a culture of no retribution for any person who reports financial abuse or exploitation of a Client.</p> <p>(g) Ensure that relevant persons in the Client's support network are informed of alleged or suspected instances of financial abuse or exploitation. Be mindful of situations where a person in the support network is the alleged or suspected perpetrator of the conduct.</p> <p>(h) Advise Clients, their families and advocates of:</p> <p>(1) their right to make a complaint under the Centre for Inclusive Supports Feedback and Complaints Management Policy and Incident Management and Reporting Policy.</p>	<b>All Workers</b>

Procedure	Responsibility
<p>(2) support services, which are equipped to identify and respond to financial abuse or exploitation and able to refer individuals to appropriate specialist services;</p> <p>(3) their right to pursue grievances and complaints and access the criminal justice system.</p> <p>(4) The right of any concerned person, including but not limited to, the Client or other person from their support network, to make a report or an allegation of financial abuse or exploitation, without fear of retaliation or retribution.</p>	
<p><b>4.8 Do not give financial advice</b></p> <p>Clients are not provided financial advice or information other than the bare minimum reasonably required to assist the Client to understand their NDIS participant plan.</p>	<b>All Workers</b>
<p><b>4.9 Communicate in the language, mode of communication and terms that the Client is most likely to understand</b></p> <p>Communicate with Clients with respect of this Policy, their money and property in a manner which is responsive to their needs in the language, mode of communication and terms that the Client is most likely to understand by:</p> <p>(a) using respectful, open, clear, and honest communication in all professional interactions (e.g., spoken, written, social media).</p> <p>(b) communicating effectively with Clients to promote their understanding of proposed supports and services (e.g., active listening, use of plain language, encouraging questions).</p> <p>(c) identifying potential barriers to effective communication and making a reasonable effort to address these barriers including by providing information and materials on how to access interpreter services, legal and advocacy services.</p> <p>(d) working with bilingual assessment staff, interpreters (linguistic and/or sign), communication specialists and relevant advocacy agencies/services that can also assist Client participation, inclusion, informed choice and control.</p> <p>(e) encouraging Clients to engage with their family, friends and chosen community if Centre for Inclusive Supports has been directed to do so in accordance with the Client induction materials, their support agreement or support plan (as applicable).</p> <p>(f) informing Clients of their rights to make informed choices, exercise control and maximise their independence relating to the supports provided in relation to services.</p> <p>(g) supporting them to exercise their rights and responsibilities.</p>	<b>All Workers</b>

Procedure	Responsibility
<ul style="list-style-type: none"> <li>(h) documenting all material communications accurately, clearly, professionally and in a timely manner and including them in the Client's information file.</li> <li>(i) supporting Clients, their family, carers and support network to find, use and access the services and supports they need and work with them to reduce any limitations or barriers where they exist.</li> <li>(j) Aboriginal, Torres Strait Islander and all people from culturally and linguistically diverse backgrounds (<b>CALD</b>) are supported in accessing services and support in the community in an inclusive and supportive environment.</li> </ul>	
<p><b>4.10 Workers to commit to Policy</b></p> <ul style="list-style-type: none"> <li>(a) All Workers are provided with a copy of this Policy in their orientation and induction materials.</li> <li>(b) Under their employment, contractor agreement or binding letter agreement, each Worker at Centre for Inclusive Supports is required to take responsibility for ensuring: <ul style="list-style-type: none"> <li>(1) full understanding of the commitments outlined in this policy as well as procedures and other strategies designed to ensure that the principles of this policy are upheld; and</li> <li>(2) ensuring that the principles and procedures and other strategies within this Policy are applied in their daily work.</li> </ul> </li> </ul>	<b>All Workers</b>
<p><b>4.11 Train Workers</b></p> <ul style="list-style-type: none"> <li>(a) Train Workers to assist them to understand how to apply this Policy and these procedures in everyday practice during their induction, and as part of ongoing refresher training and/or when processes change.</li> <li>(b) Train and support Workers to identify and report a breach of a Client's rights by any other party.</li> </ul>	<b>Principal and Key Management Personnel</b>
<p><b>4.12 Complementary policy adoption</b></p> <p>Adopt and maintain the Policy and Related Documentation which assists Centre for Inclusive Supports to demonstrate the relevant NDIS Quality Indicators related to the Participant Money and Property supports NDIS Practice Standard.</p>	<b>Principal and Key Management Personnel</b>

## 5. General

### 5.1 Relevant Legislation, Regulations, Rules and Guidelines

Legislation, Rules, Guidelines and Policies apply to this policy and supporting documentation as set out in the Legislation Register.

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## 5.2 Inconsistency

If and to the extent that the terms of this Policy are or would be inconsistent with the requirements of any applicable law, this Policy is deemed to be amended but only to the extent required to comply with the applicable law.

## 5.3 Policy Details

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## Schedule - Indicators and signs

### 1.1 Financial abuse

#### (a) Physical indicators

- (1) no access to, or unwarranted restrictions on, personal funds or bank accounts;
- (2) no records, or incomplete records kept of expenditure and purchases;
- (3) no inventory kept of significant purchases;
- (4) person controlling the finances does not have legal authority;
- (5) misappropriation of money, valuables or property;
- (6) forced changes to a person's will;
- (7) persistent failure to produce receipts; and
- (8) receipts indicating unusual or inappropriate purchases.

#### (b) Behavioural signs

- (1) person has insufficient money to meet normal expenses; and
- (2) a person is persistently denied outings and activities due to a lack of funds.

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