



ST. PATRICK'S CENTRE (KILKENNY)  
KELLS ROAD KILKENNY

## Policy Document

**POLICY TITLE: Policy & Procedure for the Management of People's Finances & Personal Assets**

Prepared by: Darina Lahiff	Approval Date: 27.04.2016	Review Date: 27.04.2018
Policy Number 07 – Schedule 5	Approved By: Signed: <u>David Kilian</u> Operations Manager Signed: <u>[Signature]</u> Board Member	

### Mission Statement

**To enable people to live a good life, in their own home, with supports and opportunities to become active, valued and inclusive members of their local communities.**

**To enable a supported self-directed living (SSDL) model of provision which is underpinned by our beliefs, values and vision.**

Review Date:  Revision No: ____	Amendments required:  _____	New Revision Status:  _____
Reviewed by:	Approved By:  Signed: _____ Operations Manager	



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## 1. Scope and overview

- 1.1 The purpose of this document is set out the procedures to be followed by St Patrick’s Centre employees in the administration of residents’ private property.
  - 1.1.1 The following guidelines outlines the steps and processes that shall be taken to ensure the interests of the resident are protected and to give clear guidance to employees in the management of residents’ property in their care.
  - 1.1.2 This document provides clear guidelines on the use of funds for the benefit of residents, particularly where a resident may not have full capacity to manage or make decisions around the best use of their funds.
- 1.2 These guidelines apply to all employees who administer residents’ private property or influence decision making in relation to residents funds.
- 1.3 The HIQA National Quality Standards, standard 2.3, also outlines standards specifically on resident finances for persons with disabilities.
- 1.4 Where a resident is a ward of court or has in place an enduring power of attorney (EPA) then the power to make any decisions in relation to funds held for safekeeping rests with the wards of court office or the person who has registered and activated the EPA with the High Court. A court appointed next friend may also have authorization (but not always, usually specified purposes) over a residents financial affairs.
  - 1.4.1 In relation to wards of court, directions shall be sought from the wards of court office and requests for funds directed to them.
  - 1.4.2 In situations where an EPA may be place, this shall be confirmed to ensure that proper authorization is in place in relation to residents funds.
  - 1.4.3 In the case off Court Appointed Next Friends, the specifics of the actual authorization shall be confirmed.
  - 1.4.4 Advice in relation to any of the above can be obtained from the HSE Patient Private Property Accounts (PPPA) central Unit in Tullamore.
- 1.5 **Definition of Resident ’s Private Property**
  - 1.5.1 A Resident ’s Private Property account is defined in Section 2 the Health (Repayment Scheme) Act 2006 as: “patient’s private property account means so much of the money and personal property of-a person provided with in-resident services referred to in Section 53 of the Health Act 1970 (as amended by section 4 of the Health (Amendment) Act 2005),a person provided with institutional assistance under Section 54 of the Health Act 1953, a person in residence used wholly or partly as a setting to provide care for persons with physical or mental disability, or a person otherwise being cared for by, or on behalf of, the Executive due to a physical or mental disability or ill

health, that is managed, on behalf of that person, by the Executive or by another person under an arrangement with the Executive whether before, on or after the commencement of Section 9.”

- 1.5.2 The above definition of resident 's private property includes personal effects such as:
- Clothing
  - Footwear
  - Jewellery and other small valuable item
  - Personal Items of furniture; ornaments, chairs etc.
  - Other personal effects
- 1.5.3 In respect of the above items, with the exception of Jewellery and other small valuable items, the primary requirement, as part of the routine care of residents and operations generally, is for staff to seek to limit any loss or damage to residents; personal effects in so far as is practicable.
- 1.5.4 In respect of jewellery and other small valuable items residents should be advised that such items cannot be safeguarded by St. Patrick's unless they are they are handed in for safekeeping to the appropriate staff. Proper records of the receipt of such valuables should be retained and all valuables should be stored in a secure area. Procedures over the receipt and storage of valuables should be followed in all cases.
- 1.5.5 All additional property acquired by a resident should be communicated to the Finance Office to ensure that the personal private property records are updated.
- 1.6 Property may also include monies or documents such as pension books that provide access to monies or facilitate the future transfer of monies to St. Patrick's to be held in safe keeping for the resident .
- 1.7 There is a practical requirement on staff being aware of, or having knowledge of, the existence of any property in order to implement these guidelines effectively.
- 1.8 There is however, an onus on St. Patrick's Centre and its staff to make **all reasonable enquiries** on admission, and subsequently if appropriate, to establish the existence and extent of any property that a resident may have brought into the facility. St. Patrick's Centre formal position remains that it cannot accept responsibility for funds or other property not handed in for safekeeping to its staff.
- 1.9 **Client Entitlements**
- 1.9.1 Once a person becomes a resident in St Patrick's Centre he / she will be supported to claim entitlement from one of the following sources: Department of Social Protection, HSE, Occupational Pension or Ward of Court.

- 1.9.2 Assistance and support will be given to people in completing necessary documentation in relation to securing their full entitlements.
- 1.9.3 Records must be kept of each resident's entitlement, financial or otherwise which should not only detail what those entitlements are but also highlight dates for renewals or changes especially where benefits are not automatically increased renewed.

## COMPETENCY IN MAKING FINANCIAL DECISIONS

### General

- 2.1 St Patrick's Centre shall not allow any resident's funds in its safe keeping to be utilised for any purpose without the clear permission of the resident other than where the resident is unable to give permission due to lack of capacity (see below)
- 2.2 St Patrick's Centre has no legal power to hand over, without their informed consent, the funds of any resident to any other person other than where that resident is a ward of court or has in place an operative EPA (enduring power of attorney) or is deceased (see procedures for dealing with transfers to third parties). All transfers to and from the PPPA Central Unit are part of the resident's Private property system.
- 2.3 Assessment of Residents capacity to handle their financial affairs
- 2.3.1 There is a general presumption that a resident has the mental capacity to make their own decisions.
- 2.3.2 St Patricks Centre shall assume a resident has the capacity to make any decision unless there is a valid reason to be concerned that this may not be the case.
- 2.3.3 The services team at St Patrick's Centre shall assess the competency of each resident to:-
- i. Make their own financial decisions
  - ii. Assess the level of support they may need in making their own financial decisions
  - iii. Each resident will be assessed on the competency assessment form below and the information will be retained in the following areas;
    - Director of Service
    - Relevant Sector Manager
    - Key Worker
    - Personal Outcomes file
    - Personal finance file,
    - and forwarded to designated family member

## 2.4 Assessment of Capacity to Make Financial Decisions

- 2.4.1 A “functional approach” should be adopted to determine capacity.
- 2.4.2 It should be assumed that individuals are capable of decision-making; however capacity may fluctuate across time and according to the decision being made.
- 2.4.3 An individual should not be regarded as being incapable of managing their money or being invoiced in its management unless all practical steps to enable him/her to do so have been taken without success.
- 2.4.4 An individual should also not be regarded as being incapable merely because the decisions he/she reaches appear to others to be unwise or irrational.

**MONEY MANAGEMENT COMPETENCY ASSESMENT FORM 2**

Name \_\_\_\_\_

Service Team Members Present at Meeting

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Family Members Present

Account Holder present at meeting \_\_\_\_\_

Rate the following questions 0 – 10. (0 indicating not able and 10 needing no support)

- Can the person communicate their choices? \_\_\_\_\_
- Can the person go shopping? \_\_\_\_\_
- Can the person pay for goods? \_\_\_\_\_
- Can the person recognise money and use it appropriately? \_\_\_\_\_
- Does the person know what income they have? \_\_\_\_\_
- Does the person understand what a bank account is and how it works? \_\_\_\_\_
- Can the person memorise a pin number? \_\_\_\_\_
- Can the person use a cash machine? \_\_\_\_\_

List any additional relevant questions and rate answers:

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Input any additional information in support of the ratings given above.

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List any areas of concern.

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Identify the Level of Support Needed

Fully Managed \_\_\_\_\_ Partly Managed \_\_\_\_\_ Not Managed \_\_\_\_\_

Outline the justification for the decision made.

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Where partly managed is indicated please identify areas where support is required and the level of support needed.

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Indicate how this support will be provided and by whom.

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Identify the money management training needs of the account holder

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Any other agreements reached in relation to money management including family, guardian or advocate involvement.

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Signed: \_\_\_\_\_  
Account Holder      Date \_\_\_\_\_

\_\_\_\_\_ Date \_\_\_\_\_  
Programme Co-coordinator/Manager

\_\_\_\_\_ Date \_\_\_\_\_

Family Members  
\_\_\_\_\_ Date \_\_\_\_\_

### **3 Communication / Information with Residents and Families on Finance**

- 3.1 St Patrick's Centre is committed to working in a transparent manner in relation to its administration of funds held on behalf of residents.
- 3.2 All Sector Managers will facilitate meetings with residents or families who wish to query any areas of expenditure and or income.
- 3.3 Records or copies of receipts can be made available to any resident or family member on request.
- 3.4 Residents capable of managing their own financial affairs
- 3.4.1. In cases where a resident is capable of managing their own financial affairs, information on any aspect of their PPPA will only be provided to the resident themselves or to a person nominated in writing by the resident to receive such information.
- 3.4.2. Where any third party requests information relating to a residents' PPPA activity they should be advised that this information is private and confidential to the resident and this information cannot be released to them without the express permission of the resident.
- 3.5 Residents not capable of managing their own financial affairs
- 3.5.1 In general, all resident financial information is private and confidential to the resident themselves, irrespective of whether the resident is cognitively impaired or not. Third parties, even when close relatives, do not have a general right to access information on resident PPPA activity or balances, even when a resident is cognitively impaired.
- 3.5.2 There are, however, a number of circumstances where a third party will have a legal authority over the financial affairs of the resident and may therefore be entitled to information.
- 3.5.3 There are also a number of limited circumstances where St. Patrick's Centre may provide some financial information to a third party when provided for the benefit and in the best interest of the resident. In such circumstances, the Centre must be in a position to demonstrate that the release of this limited information in such circumstances is justifiable, valid and in the legitimate interest of the relevant resident.
- 3.6 Engagement with Families (Next of Kin)
- St Patrick's will seek to involve next of kin (or engage with family member(s) to nominate a person to be involved) in as much as is practical and appropriate in the care of residents. The agreement by the next of kin or nominated person to be recipient of financial information will be recorded and signed by the parties involved( the sector manager/ next of kin). Any involvement must be in the best interest, and for the benefit, of the resident

and respect the resident's right to privacy and confidentiality. This one family member (or nominated person) will be designated for the receipt of all correspondence in relation to Residents finances within our service.

St Patrick's supports the principle of its clinical and other staff, who deals directly on an on-going basis with residents and their relatives/friends, in making detailed decisions about the management of residents fund accounts. These staff, using their professional judgement, are best placed to know what maybe both safe and appropriate in respect of one resident and their funds while being clearly in appropriate in respect of another resident. The sector management are best placed to ensure that the residents' funds are used for the benefit of the residents and no resident is denied the benefit of their money.

### 3.7 Statements of Account

3.7.1. The Finance Office will make account statements of Residents' Private Property Accounts available for inspection as and when requested by the Residents, the appropriate manager or nominee of the resident.

3.7.2. On a monthly financial statement will issue from the Finance Office to the resident where appropriate and to the nominated person in other cases. This statement will outline account transactions opening balance, income and expenditure (itemised) and closing balance.

### 3.8 Communication with Families

All communication of resident financial activity with families are open to scrutiny and St Patrick's Centre sees such queries as positive interest and engagement by families in the welfare of their member in our care.

### 3.9 As a control measure the monthly statement will issue to the relevant Sector Manager for verification.

3.9.1 This balance and transaction statement will be duly signed by Sector Manager and Key worker.

3.9.2. This signed document will be held on file in the Sector Managers office. This signed document will be held in the strictest confidence on behalf of the resident.

3.9.3 The balances & notifications from Monies held centrally in the PPP Accounts in the HSE Central Unit in Tullamore will also be held on file in each sector manager's office and information will be forwarded to designated family member as per policy.

## **4 Roles and Responsibilities**

- 4.1 The Sector Manager of St Patrick's Centre shall ensure that all staff including new employees responsible for handling residents' property is aware of these regulations. The Manager shall also ensure as far as possible that effective segregation of duties operates in relation to Resident's property. Where this is not possible additional oversight shall be put in place.
- 4.2 Where possible, residents should be discouraged from bringing large sums of money and or valuables into the centre
- 4.3 There is a duty on St Patrick's centre to safeguard residents' funds and their property.
- 4.4 The Manager shall arrange that each resident, or where appropriate the relative or friend who accompanies the resident, be informed that St Patrick's Centre will not accept responsibility for resident's property brought into the Centre or home unless they are deposited for safe custody and an official receipt obtained.
- 4.5 Information to this effect shall be available in the residential area.
- 4.6 Each employee, who deals with residents property is required to make themselves familiar with the content of these guidelines and is responsible for their implementation (This also applies to anyone who influences decisions in relation to residents' funds)
- 4.7 Resident's funds held in the PPPA belong to the resident and no other person. St Patrick's Centre has an implied trustee relationship with its resident in respect of those funds.
- 4.8 If these funds are deposited into a deposit account any net interest earned on these funds belongs to the resident
- 4.9 St Patrick's centre is committed to promoting the independence of its residents to the greatest extent possible, consistent with the provision of safe and appropriate care. In this context residents are encouraged and supported to make their own arrangements regarding safekeeping of their funds. However, where necessary St Patricks centre offers the PPPA service.
- 4.10 St. Patricks centre has a duty to be able to properly record and account for all movements in the funds held by it in safekeeping for residents. In this context there is a computerised system in place. It is part of the overall package of care for the resident.
- 4.11 The guidelines provided by the HSE are the main reference for guidance in relation to managing residents' funds and the Central unit in Tullamore is available for advice.

## **5. Accounting and Banking**

- 5.1 An accounts management system, called Trojan, is used to manage PPPA held locally by St. Patrick's. Each resident has a nominated account in this system. The responsibility for the management of the resident accounts lies with the Finance Manager. The accounts are operated by a nominated officer and disbursements from the account shall only be made in accordance with policy guidelines.
- 5.2 This accounts system shows all payments and receipts relating to each individual resident and is the banking system by which individual records are maintained for each resident. A statement issues from this system monthly for each resident. A copy is sent to the nominated family member where requested by the resident and another copy is held by the Sector Manager.
- 5.3 The accounts system contains a control account showing opening balance, total cash received for residents, total payments to residents and balance on hand.
- 5.4 The control account shall be balanced each month and reconciled to the dedicated residents bank account (see 5.6 below)
- 5.5 All data held in the accounts system is backed up to the main St. Patrick's server and cloud backups in the same way as all other data held in the Centre.
- 5.6 All PPPA funds held locally by St Patricks centre are lodged to a specific bank account, approved by the board. This account is also the nominated central account where payments are made from the Department of Social Protection, HSE etc. are received on behalf of residents.

The account is entitled \_St Patricks Centre re: Residents Private Property Account. (Current Account)

- 5.7 There are two signatures required for managing this account and this mandate is approved by the Board of Directors. The Board must approve any change in signatories for this account.
- 5.8 All money transmitted to the centre's staff for safekeeping shall be receipted and lodged in this account at the earliest opportunity. A resident may, if they so choose, keep cash in their personal purse instead of lodging to the account but the lodgement should still be recorded by the Income Officer in the Finance Office.
- 5.9 It is the responsibility of the staff member receiving the money to ensure that it is receipted appropriately by Finance.
- 5.10 The finance manager shall report to the finance committee the balance on residents control accounts and the reconciled balance in the bank and the date to which both accounts are reconciled.

## **6 Receipts and custody of Receipt books**

- 6.1 Receipt books are held by the Stores Officer and will only be issued to authorised personnel when required.
- 6.2 Books of receipts shall be retained only by authorised officers.
- 6.3 Residents Property Cash Receipt Books shall be in triplicate, the top copy being the receipt issued. Residents Property Receipt Books shall be retained including copy and cancelled receipts.
- 6.4 All cash received shall be receipted and the receipt will contain the following information:
  1. The date of the transaction;
  2. The amount in words and numbers;
  3. The name of the payee if not a resident;
  4. The name of the resident to whom the cash refers;
  5. The signature of person issuing the receipt;
- 6.5 No acknowledgements will take place without a receipt
- 6.6 A cancelled receipt shall be retained in the receipt book.
- 6.7 An error shall be corrected by striking a line through the mistake and the correct entry entered above or below the error on the top copy and initialled.
- 6.8 Foreign currency should be converted to Euros and banked on the earliest possible date.

## **7 Residents Expenses/ Withdrawals**

- 7.1 All expenses/withdrawals shall be vouched whether incurred by cash or cheque.

### **Weekly expenses petty cash (Unit)**

- 7.1.1 Each Sector Manager shall have petty cash float approved by the finance manager. The float shall be reviewed and adjusted to reflect current needs to eliminate the holding of excess funds and or too frequent reimbursements.
- 7.1.2 The use of cash shall be minimised as far as possible to reduce security risk.
- 7.1.3 The petty cash float is St Patrick's cash and the float shall be used for residents' comforts funded by St Patrick's, which should be minimal, staff purchases when accompanying a resident subject to limits below or for other items that may be required in the unit outside of normal purchasing procedures:

7.1.3.1 Full lunch or Dinner

When a staff member accompanies a resident to have a full lunch or dinner it is reasonable that the staff member can have refreshments up to a maximum value of €7.50. Any amount incurred over this must be paid by the staff member themselves.

7.1.3.2 Light Refreshments

Where a resident accompanies a service user to have light refreshments it is reasonable that the staff member can have refreshments up to a maximum value of €2.50. Any amount incurred over this must be paid by the staff member themselves.

- 7.1.4 The petty cash floats shall form part of cash on hand in the general ledger bank account.
- 7.1.5 The Sector Manager shall sign for cash received in respect of reimbursements and any changes to the approved float.
- 7.1.6 The Sector Manager shall maintain a record (cash book) showing on a cumulative basis the cash expenses and cash balance for the float. This is reconciled when the staff member comes to the Cash Office to do the weekly top-ups.
- 7.1.7 The Sector Manager or the Assistant Director shall approve expenditure.
- 7.1.8 All expenses shall be supported by an expense receipt for the amount spent.
- 7.1.9 There should always be two parties to the transaction.
- 7.1.10 The name of the Resident to whom the expenditure relates should be written clearly on the expense docket.
- 7.1.11 The cash on hand plus expense vouchers shall equal the approved float.
- 7.1.12 Petty cash funds (including cash, receipts and vouchers) must be kept in a secure locked box in a locked drawer or locked safe. The keys shall be held by the delegated person; the spare key shall be labelled and held in the director of services office.
- 7.1.13 The amount of the floats shall not exceed the amount provided by the insurance policy and the only receipts in the petty box cash shall be the expense vouchers for reimbursement.
- 7.1.14 Only the Sector Manager or delegated person shall have access to and disburse petty cash. Handling of petty cash should only take place in secure locations.
- 7.1.15 The Sector manager should report cash shortages or excess cash immediately to the Income Officer who in turn reports directly to the Finance Manager. A review

of transactions shall be carried to ensure the accuracy of the records in the first instance.

7.1.16 The Person in Charge of the petty cash box should report any thefts or attempted thefts immediately to the Income Officer.

7.1.17 The Finance Manager or his/her delegate may request written verification of petty cash balances periodically from the house Manager and shall periodically perform unannounced checks of petty cash floats.

## 7.2 Residents Individual Purses

7.2.1 The Sector Manger for each house must ensure that residents have unlimited access to their finances and financial information at all times, if they so wish; in keeping with regulation 367.

7.2.2 Resident's monies and records will be kept in a locked filing cabinet / safe at all times.

7.2.3 The Staff Nurse/ Staff on duty/Keyworker will facilitate residents accessing their money.

7.2.4 All transactions must be signed by the designated staff member(s) at the time that the transaction occurs.

7.2.5 When purchases are being made staff must check the current balance and record on the Expenditure Form how much was given to the resident/or taken to purchase items for the resident and for what.

7.2.6 Staff must check balance and sign for all withdrawals and lodgements. When two staff or more are on duty, two staff must sign.

7.2.7 A receipt must be returned held with the Expenditure Form initialled by the staff that made the transaction, and the new balance recorded. The Expenditure Form is to be initialled by two staff, in homes where two staff are on duty, or by the staff on duty for single staffed homes following each withdrawal/lodgement. Receipts must be returned to the Finance Office for allocating to each resident's account on Trojan.

7.2.8 The expenditure form is to be filed on a monthly basis in the resident's personal file.

7.2.9 Agreed Amounts of Cash to be Held in Each House

7.2.9.1 A maximum amount of no more than €100.00 is to be held for each resident unless approval has been given by the relevant Sector Manager/PIC for higher amounts, based on an individual's personal financial requirement or if a specific purchase has been requested



- 7.2.10 When amounts need to be topped up, staff on duty will email Income Officer & Finance Manager on Monday to request amount required to be available on Wednesday.
- 7.2.11 Every Wednesday the staff or resident will call to the Cash Office in admin building to collect the cash, this transaction will be recorded in a receipt book signed by staff/resident and Income Officer. The duplicate receipt will be held in each resident's personal purse/finance file.
- 7.2.12 If required, the Income Officer can meet the residents in the canteen area to facilitate their visit.
- 7.2.13 Cash Transactions' Requiring Management Approval
- 7.2.13.1 Any requested sum above €100 must be put in writing and signed by resident, where possible, or their Next of Kin outlining the details of the proposed purchase / items and cost. The Sector Manager/PIC will consider and approve the request. The signed approval to be filed in the resident's personal file and a copy will be provided to the Income Officer.
- 7.2.13.2 Where a withdrawal exceeds €100, two signatures should be placed on the record of the withdrawal.
- 7.2.14 Procedure for checking and auditing resident finance
- 7.2.14.1 It is the responsibility of the staff on duty to ensure each purse is correct at the end of each shift. Any anomalies must be reported immediately by completing the Cash Error Form. This must be signed to the relevant CNM1/CNM2, or in his/her absence the relevant ADOS. All Cash Error Forms must be sent to the Finance Manager to review and sign.
- 7.2.14.2 Anomalies include:
- A missing receipt.
  - A hand written receipt [other than previously approved].
  - Cash available not in accordance with the Residents Expenditure sheet.
- 7.2.14.3 All unaccounted cash errors must to be reported to the Income Officer and the Finance Manager.
- 7.2.14.4 A copy of the Cash Error Form will be kept on the residents file and a copy filed in the Cash Office.

- 7.2.15 Resident's monies cannot **under any circumstances** be used as a loan to another resident or by staff to purchase their snacks while out. Staff snacks should be purchased from the Petty Cash Float.
- 7.2.16 The Sector Manager/ PIC will audit resident finances on a monthly basis and will maintain records of these which will be filed in residents files.
- 7.2.17 The Assistant Director of Service or another nominated person will spot-audit resident finances on a 6-monthly basis.
- 7.2.18 The Provider will commission annual audits of resident finances by an independent external agency / organisation.
- 7.2.19 There is an upper limit of €100 per expense per resident that can be approved by the Sector Manager.
- 7.2.20 Expenses in excess of €100 must be supported by either Next of Kin approval or input and support from the Independent Advocate as appropriate.
- 7.2.21 The cash on hand plus expense vouchers shall equal the approved float.
- 7.2.22 Petty cash funds (including cash, receipts and vouchers) must be kept in a secure locked box in a locked drawer or locked safe. The keys shall be held by the delegated person; the spare key shall be labelled and held in the director of services office.

### 7.3 Reimbursement of expenses

- 7.3.1 Each unit will visit the Cash Office on a weekly basis. The standard day for topping up is a Wednesday but other days can be facilitated by contacting the Finance Office
- 7.3.2 The Income Officer can do top ups in the canteen if this is a more suitable location for a resident to attend in person.
- 7.3.3 The reimbursement will be limited to vouched expenses incurred i.e. weekly total as per cash book. The Income Officer shall collect the vouched expenses dockets.
- 7.3.4 All expenses are entered into the Trojan accounts software by the Income Officer.
- 7.3.5 Analysis of expenditure by unit is performed on a periodic basis by the Finance Manager.

## 7.4 Withdrawals in Favour of Third Parties.

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### 7.4.1 Residents Capable of managing their own Financial Affairs

In cases where a resident is capable of managing their own financial affairs, information on any aspect of their PPP a/c will only be provided to the resident themselves or to a person nominated in writing by the resident to receive such information. Residents should be periodically provided with on-going information on their PPP balances and transactions.

Any third parties requesting information on resident PPP a/c activity in such cases should be advised that this information is private and confidential to the resident and that the HSE cannot release same to them without the express permission of the resident.

### 7.4.2 Where a resident has sufficient mental capacity to make the decision in relation to managing their money the following procedure applies:

7.4.2.1 The duplicate expense/withdrawal docket shall be signed by both the resident and the designated finance staff. The signing shall be witnessed by another staff member.

7.4.2.2 The expense/withdrawal docket is used to reimburse St Patrick's.

7.4.2.3 The name of the resident to whom the expenditure relates should be written clearly on the documentation.

7.4.2.4 the expenditure docket must not be signed by the resident until the Finance manager is present and witnesses the signing of the form by the resident.

7.4.2.5 Staff signing as witnesses is solely confirming that the resident signed the docket in their presence and did so without any apparent undue influence. The competency test has already established the resident's ability to manage their money.

### 7.4.3 Residents not Capable of managing their own Financial Affairs

7.4.3.1 In general, all resident financial information is private and confidential to the resident themselves, irrespective of whether the resident is cognitively impaired or not. Third parties, even when close relatives, do not have a general right to access information on resident PPP activity or balances, even when a resident is cognitively impaired.

- 7.4.3.2 There are, however, a number of circumstances where a third party will have a legal authority over the financial affairs of the resident and may be entitled to the information. Where this is established information will be provided as requested.
- 7.4.3.3 There are also a number of limited circumstances where St. Patrick's Centre *may* provide *some* financial information to a third party when provided for the benefit and in the best interest of the resident (i.e. a means test assessment) In such circumstances, the Centre must be in a position to demonstrate that the release of this limited information in such circumstances is justifiable, valid and in the legitimate interest of the resident.
- 7.4.3.4 Where a resident does not have sufficient mental capacity to make the decision around their funds the following procedures apply:
- Other than the reimbursement of receipts, St. Patrick's Centre does not permit the withdrawal and payment to 3<sup>rd</sup> parties of funds from the accounts of Residents who lack capacity to give informed consent to such withdrawals – the only exceptions are where there is an Enduring Power of Attorney in operation or the resident is a Ward of Court.
  - The 3<sup>rd</sup> party may inform the sector Manager of the items s/he wishes to purchase on behalf of the resident and following consultation with the Director of Services & Finance Manager, Sector Unit Manager may purchase those items.
  - Give an immediate re-imburement for monies spent by the 3<sup>rd</sup> party on production of receipts for agreed expenses.
  - Expenditure in excess of €5,000 per annum of resident's monies will require circuit court approval and all accounts will be monitored in this regard.

## **8 Personal Property Register (Assets' register)**

- 8.1 The personal property of each resident in St Patrick's centre will be treated with due care and diligence at all times and information will be held on a personal property register.
- 8.2 All additions in property for each resident will be communicated to the Finance Department who will update the property register as per the Trojan
- 8.3 A register of property will be sent to each resident by Finance on a 6 monthly basis for verification. Changes required are sent to finance and an updated register is provided to the Sector Manager for filing on each resident's file.

- 8.4 The Sector Manager will ensure that a personal private register for each resident will be held in hard copy format in their service sector area. This register will be easily accessible to residents, key workers, designated family members and inspectorate personnel
- 8.5 This personal property register will hold information in relation to items of property owned by a resident and in regular use. Examples are A Vehicle, TV, Radio CD's Bed Lockers wardrobe personal chair pictures etc. or any other significant personal items outside routine personal clothing.
- 8.6 Personal property may be purchased by the resident or gifted by a friend or family member.
- 8.7 The Finance manager will be responsible for ensuring that an individualised Personal property register (asset register) is completed for each resident in St Patrick's Centre.
- 8.8 Updating the register
- 8.8.1 To sustain the usefulness of the personal property register, it is vital to maintain and update it; to this end the St Patrick's Centre has the following process in place.
- 8.8.2 The sector manager and the Finance manager will review each personal property sheet on a 6 monthly basis ensuring that it is always an accurate description of the property owned by a particular resident and will hold an account of deterioration of any asset owned by a resident.
- 8.8.3 On the completion of each review and update the personal property register must be signed and dated by the Sector Manager.
- 8.9 Concerns in care of personal property
- 8.9.1 The Director of Services will be contacted in relation to any concerns about the lack of safe keeping or exclusive use of private property of any resident in St Patrick's and it will be recorded as a formal comment under the St Patrick's Centre Compliments , Comments and Complaints procedure and will be investigated by the designated complaints officer

8.10 Procedure for recording and safe custody of residents' personal property not in regular use within the service.

- 8.10.1 In all cases a comprehensive list shall be made of property in the Resident's possession, indicating whether retained by the Resident or handed in for safekeeping.
- 8.10.2 Where a Resident is confused or considered by the Sector Manager to be incapable of looking after his/her personal property, comprehensive and accurate details shall be listed and the money and valuables in his/her possession shall be taken into care. The terms "gold", "silver" or "diamond" etc. should not be used. Terms such as yellow, metal, white metal or white stone should be used instead. Small valuables should be placed in a Resident's property envelope. The contents of the envelope should be listed. Where the Person in Charge is of the view that an item is particularly valuable it should be photocopied and held on file.
- 8.10.3 The list of Resident's property in safe keeping shall be in triplicate and shall be signed by the house manger or the Officer in charge of the arrangements for the house. It should also, where possible, be signed by the resident or relative or friend of the resident.
- 8.10.4 One copy of the completed list shall be retained in the house with the resident's records; one copy shall be given to the resident's representative. One copy of the list shall be sent by the house manger to the Finance Manager together with all the money and valuables, which were not retained by the resident.
- 8.10.5 The Manager shall arrange for the issue of a receipt in respect of the money and property lodged with him, this receipt shall be retained with the house copy of the list of property.
- 8.10.6 If a receipt has to be cancelled, the top copy should be marked cancelled and retained in the receipt book.
- 8.10.7 Valuables and cash awaiting lodgement, the property of Residents, should be held by the Manager, properly secured in a safe place. Cash held in houses shall be held in a secure place.
- 8.10.8 If for any reason a Residents Private Property Account form or any other form relating to the administration of the Residents Private Property Account has to be cancelled, the top copy and all copies should be marked "cancelled" and retained in the original book.
- 8.10.9 Any alteration to an entry in Residents Private Property Account records should have a line crossed through the original entry, such that it can be

read and the revised entry initialled by the relevant member of staff on all copies.

- 8.10.10 Where a Resident hands over additional property a new form shall be completed.

## **9 Resident Funds versus St. Patrick's Funds -**

### **Who should pay for what? (Reference HSE NFR 22 Version 1.0 May 2011)**

- 9.1 It is not appropriate to request or utilise Residents' funds for the following: -
- 9.1.1 Furniture/fittings/equipment – it is St. Patrick's responsibility to fund from its own resources, the cost of necessary furniture, fittings and equipment within residences, day areas etc.  
The Resident may augment, from their funds, these basic items with additional items that the Resident desires which are over and above the norm of that St. Patrick's provides and which are not considered necessary for the care of the specific Resident or Resident in general.
  - 9.1.2 Facilities Upkeep/Refurbishment/Maintenance/Decoration
  - 9.1.3 Medicines – the costs of medicines required by Residents Should any issues arise in this area it is reasonable for St. Patrick's to only cover the costs of medicines, which its care professionals are satisfied are both necessary and appropriate for the care and wellbeing of the Resident.
  - 9.1.4 Aids/Appliances – to the extent that St. Patrick's is satisfied that aids/appliances are required for the appropriate care of the Resident then it is generally a matter for St. Patrick's to fund same, to the extent that it is in a position to do so within available resources.
  - 9.1.5 Nutrition Supplements/ Special Diets prescribed by Dietician or Doctor
- 9.2 It may be possible to utilise Residents' funds for their benefit to purchase certain items for their benefit:
- 9.2.1 Nutrition Supplements/ Food – the Resident may augment what St. Patrick's provides, from their own funds, additional personal items of food/nutritional supplements that the Resident desires, which are over and above the norm of what St. Patrick's provides and which are not considered necessary for the care of the specific Resident or Residents in general.
  - 9.2.2 Personal Hygiene/Personal Grooming – only standard hygiene items such as soap, toothbrush, toothpaste, deodorant, etc., are provided at St. Patrick's expense.
  - 9.2.3 The Resident may augment, from their own funds, these basic products with additional grooming products such as make-up, perfumes, aftershave, etc.

- 9.2.4 In regard to hair dressing this is normally undertaken at the Residents' expense. However, appropriate local professional discretion involving the use of St. Patrick's funds must be exercised to ensure Residents' personal grooming, including hair, does not fall below a minimum standard consistent with their general wellbeing.
- 9.2.5 GP/Chiropody/Optical/Aural/Immunisation etc. – These services, to the extent that St. Patrick's is in a position to provide them within available resources, will normally be provided either as part of the facilities of the unit or may be accessed through the Resident (s) medical card/GP visit card.
- 9.2.6 It will be necessary for appropriate local professional discretion, involving use of St. Patrick's funds, to be exercised in respect of the small minority of Residents who are both: Not eligible for a medical care and In need of additional services beyond those directly provided by the unit they reside in.
- 9.2.7 Trips/Outings/Other Social Activities – a Resident should only be liable for reasonable costs for trips/outings/other social activities (including parties etc.) Discretion must play a significant role in relation to this area and in considering what is reasonable the following must be taken into account: -
  - 9.2.7.1 It is not appropriate for any costs relating to Staff attending or facilitating such trips, outings or social activities to be borne by Resident (s) funds.
  - 9.2.7.2 Resident (s) should only be asked to contribute to the costs of trips etc. that they will be attending or are likely to attend.
  - 9.2.7.3 Where there is a group activity the residents contributing shall have an equitable benefit.
  - 9.2.7.4 If a social outing is part of a resident's personal care plan they should not be charged for the costs associated with this.

### 9.3 Where Resident Should Primarily Fund Costs

- 9.3.1 Clothing – The general position is that clothing is something, which Residents should provide from their own funds if for no other reason than the fact that this reinforces their personal dignity and independence. A resident's taste and wants should be considered when deciding on types of clothing to be purchased and costs incurred should be reasonable. However local professional discretion should be used and St. Patrick's funds must be exercised to ensure that Resident (s) clothing does not fall below a minimum standard consistent with their general wellbeing.



9.3.2 The below list gives some examples of items that should be purchased exclusively by the resident. Such items are not vital to ensure that a quality of care is delivered to the resident and they are choices for additional luxuries that a resident makes

The list below gives other examples of goods and services that may be purchased from personal funds.

Personal Care	Arts and crafts materials
Toiletries and makeup	Tropical fish and fish tanks
Services of a private chiropodist	Outings
Rent allowances	Purchase of tickets to cinemas, theatres and recreation centres
Manicure	Health Insurance
Facials	Shopping Trips
Hairdressers	Personal Possessions
Barbers	Pot plants, flowers and containers
Massage & Sauna	Personal Ornaments and pictures
Provision of private dry cleaning	Items of furniture or other household furnishings (other than that normally supplied as part of service provision)
Life insurance	Jewellery
cleaning	Special personal equipment e.g. portable foot spa
Recreation	o Electric shavers, hairdryers and other electrical equipment
Loans / Repayments	Non HSE spectacles and lenses
Travel costs	PC, typewriter
Music Tapes / CD's	Miscellaneous
Books and games	Outings on birthdays, anniversaries and other special occasions
Photography	Carry out food
Subscriptions to magazines / newspapers	Purchase of holidays or weekend breaks
Hobbies / Interests	Funeral Expenses
Fees for evening classes	Insurance policies to cover funeral expenses.
Membership to leisure centre / gym	
Other outings	
Please reference Long Stay Charges assessment policy document for further allowances for charges	

## 10 Deceased Residents of St Patrick's Centre

### 10 Funds and Other Property of Deceased Residents (Reference HSE NFR 22 Version 1.0 May 2011)

10.1 Funds of deceased Resident/resident should be passed to the resident's Legal Personal Representative.

Legal Personal Representatives are either:-

- Executors Appointed within a will – they become responsible for the Resident's/resident's assets immediately upon death. Their function is to obtain a “grant of probate to the estate (all savings and property), from the Probate Office in Dublin or a District Probate Registry outside Dublin, and to administer the estate.
- Administrators – May be appointed by the Probate Office in Dublin or a District Probate Registry (outside Dublin) where no will has been made by the deceased i.e. the person has died intestate – do not become responsible until appointed by means of a “grant of representation” – their function is to obtain a “grant of administration/letters of administration intestate” and to administer the estate.

10.2 Deceased Resident's Last Will & Testament

10.2.1 In so far as is appropriate and feasible in the context of ensuring the overall care and wellbeing of the Resident/resident, St. Patrick's Centre should seek to establish whether Residents/residents have made a will and who the Executor(s) and solicitor for same is.

10.2.2 If this information is not available to St. Patrick's at the time of death, then all reasonable enquiries to relatives, friends and others, as appropriate, to the extent that they can be established by St. Patrick's should be made.

10.3 Release of Funds where Executors or Administrators are appointed

10.3.1 Executors (appointed within a will)

Resident's/resident's funds can be released to the Executors on production of the Grant of Probate issued by the Probate Office or District probate Registry.

Cheques should be made payable to “The Executor(s)” (or preferably to a Solicitor acting for the Executor) of (Resident Name) (Deceased)” and a copy of the cheque along with any calculations and correspondence should be copied to the Probate Office.

10.4 Administrators (where there is no will)

10.4.1 Resident's/resident's funds can be released to the Administrator(s) (or preferably to a Solicitor acting on their behalf) on production of the “letters of administration” issued by the Probate Office or District Probate Registry.

10.4.2 Cheques should be made payable to “The Administrator(s) (or preferably to a Solicitor acting on their behalf) of (Resident Name) (Deceased)” and a copy of the cheque along with any calculations and correspondence should be sent to the Probate Office.

10.5 Release of Funds where NO Executors or Administrators are appointed.

10.5.1 Where having made all reasonable enquiries, St. Patrick’s is advised that there is no will and no intention to seek the formal appointment of an administrator, St. Patrick’s may pay out Resident’s/resident’s funds where the balance held is no more than €30,000 provided: -

10.5.2 St. Patrick’s Centre has no valid reason to believe that the Resident/resident had any significant assets such as a house or other land/property that would make formal administration a legal necessity.

10.5.3 Written consent to the payment, from the appropriate next of kin known to St. Patrick’s Centre, confirming their status as such, is available in the form of an affidavit legally executed by those next of kin which includes an indemnity to St. Patrick’s Centre in the event of any other beneficiaries including next of kin, with a better entitlement, presenting subsequently

10.5.4 Receipt of a Capital Acquisitions Tax Clearance Certificate

10.5.5 Where the amount payable is greater than €30,000 a Deed of Administration must be granted.

10.6 Assistance from Probate Office

10.6.1 Next of kin are defined in the succession act in order of priority. The succession rules are relatively complicated but can be summarized as listed below. Children, grandchildren, great grandchildren, and so on.

10.6.2 Next of kin means “blood relation” only excludes “step” relations but includes half-brothers, half-sisters and so on.

10.6.3 The Probate Office are very helpful in advising members of the public on such matters and can assist individuals to make personal applications for grant of probate/letters of administration.

10.6.4 This may prove more straightforward than the affidavit/indemnity process listed above where the affairs of the deceased are relatively uncomplicated and their overall estate (funds/property) etc.) Are limited.

10.6.5 Relatives should be encouraged to make contact with the probate office in cases where they do not intend getting a solicitor to obtain grant of probate/letters of administration.

10.7 All Reasonable Enquiries

- 10.7.1 All reasonable enquiries includes written communication with any individuals known by St. Patrick's Centre who may have information as to the existence of next of kin including any persons mentioned in the Resident's/resident 's files, other regular visitors of the Resident/resident , Community welfare officer services where appropriate.

**11. The Patient Private Property Account Central Unit (PPPA CU),**

- 11.1 The PPP Account Unit (PPPA CU), based in Tullamore, is the national co-ordinating unit for Resident Private Property Monies within the HSE

The PPPA support unit:

- Supports Care Centre nationally in managing Probate cases
- Provides on-going support to Care Centres on other PPP issues
- Coordinates the preparation and audit of PPP National Annual Accounts for HSE.
- Leads on national PPP developments and liaises with external agencies on PPP matters nationally.

- 11.2 *The main suite of official Forms in regard to the requisite procedures outlined in this regulation are to be accessed at HSENet – HSE National Intranet – PPP Account Central Unit*

**General**

- 11.3 All requests for the transfer of funds must be completed on the Official Request Form (Refer to HSE Net – HSE National Intranet – PPP Account Central Unit for suite of forms) and certified appropriately. Requests should be forwarded by post to the PPPA Cu, at the above address. Funds will then be transferred to the requesting Care Centre PPPA bank a/c.
- 11.4 Requests by Care Centres for the transfer of funds from the PPPA CU received by the PPPA CU on a Friday will be transferred by EFT to the Care Centre PPP bank a/c by the following Friday, assuming that the request is accepted. Such funds transfers should be reflected in the PPP Accounts of the relevant Care Centre to provide an appropriate audit trail for the transaction.
- 11.5 Full documentation is available from St Patrick's finance manager on the Patient Private Property documents as published by the HSE from time to time

## 12. Dormant Accounts and Chief State Solicitors Office

- 12.1 On the death of a resident for whom St. Patrick's Centre holds PPP, the relevant personnel will arrange to pass all aspects of the deceased to their Executor / LPR.
- 12.2 In cases where the deceased resident did not make a will and died without next of kin the Minister for Finance becomes the Ultimate Intestate Successor. Once St. Patrick's Centre has established that a deceased resident meets these criteria, arrangements shall be made to transfer private property of the resident to the Chief State Solicitor's Office (CSSO) who receive all such payments on behalf of the Minister.
- 12.3 Before consideration is given to transfer funds to the CSSO, St. Patrick's Centre ensures that all reasonable avenues of enquiry have been exhausted in establishing the existence of a will and/or next of kin.
- 12.4 Any queries on this process should be forwarded to the PPPA Central Unit, or CSSO  
Contact details:  
The Chief State Solicitor's Office  
Osmond House  
Little Ship Street  
Dublin 8  
Ireland  
Phone: 01 417 6100  
Fax: 01 417 6299  
E-mail:[contact@csso.gov.ie](mailto:contact@csso.gov.ie)

### **13 Internal review**

- 13.1 The Finance Manager shall ensure that an audit trail exists to record the progress of each transaction and who dealt with its various stages and signed regular reports will issue to the General Manager's office.
- 13.2 The Finance Manager shall ensure that a recorded internal check system is in place and that all books and records are reviewed on a regular basis to ensure that all monies and property are properly accounted for and the above regulations are complied with.
- 13.3 The Finance Manager shall ensure that there is a record held of all residents' assets and that this is routinely verified.
- 13.4 Auditors (Internal & External) shall have the authority to examine all books and records in order to ensure that all monies and property are properly accounted for.
- 13.5 The books and accounts of residents' private property should be subject to independent annual audit by persons appointed for this by the board.
- 13.6 The Finance Manager should determine the balance required in the Residents Private Property Account funds to be retained in the account to meet current needs.
- 13.7 The Trojan computerised Residents Private Property Accounts System is backed up at regular intervals and a copy of data held off site in accordance with approved procedures.
- 13.8 Access to the Private Residents Accounts System shall be limited to the appropriate staff.
- 13.9 When staff no longer requires access, their access should be removed.
- 13.10 The accounts should be reviewed for any unusual activity, i.e. a list of withdrawals forwarded to the director of services or other nominated person.

## 14. Segregation of duties

- 14.1 The Finance Manager is responsible for ensuring that different officers perform the different activities involved in the PPP process, although these activities form part of the same transaction.
- 14.2 The Finance Manager must ensure that regular checks on all PPP transactions are carried out by an officer independent of the process.
- 14.3 The task of maintaining PPP records i.e. ledger, accounts, should be segregated from: receipting resident's private property upon admission. The storage of PPP in a safe/cash box storage of resident's social welfare information, where applicable.
- 14.4 The task of authorising payments from the PPP account should be segregated from: posting withdrawals on residents' accounts processing and signing of the PPP cheque.

## 15. Reporting of Irregularities

- 15.1 **Any member of staff** who considers that there may have been an irregularity that could lead to misappropriation of funds or an instance of fraud should report this immediately to an appropriate manager (In the case of the General Manager the chairperson of Board )
- 15.2 The manager to whom the matter has been reported must inform the director of Services within St Patrick's Centre and the Senior Staff person on duty a written record will be kept of this report.
- 15.3 An investigation process may be instigated in such instances but it will be registered as a formal comment within St Patrick's Centre. This will be reviewed and reported in the context of the Centre's Compliments, comment and complaints policy framework under the direction of the Centre's nominated complaints officer.

## 16. Residents Charges and Refunds

### Legislative Framework

The legal basis for levying a charge on a person for long stay in-patient services is:-

- Section 53 (2) (a) of the Health Act 1970 as amended by the Health (Amendment) Act 2005.
- Health (Charges for In-patient Services) Regulations 2005 S.I. No. 276 of 2005.
- Health (Charges for In-Patient Services) (Amendment) Regulations 2006.

### 16.1 Charges

The regulations provide the statutory basis for the imposition of charges for persons in receipt of inpatient services whether or not such persons have full or limited eligibility. The regulations provide for two different classes of person on whom charges can be levied and the maximum charge which can be imposed in respect of each class.

16.1.1 All charges are included in the Contracts of Care and are communicated to each resident.

16.1.2 Any change in charges is communicated to the resident as and when they occur.

### 16.2 Assessment of Ability to Pay Charges

The regulations provide for an Assessment Form to be completed by the patient/resident or their next of kin for a decision on the relevant charge. Assessment Forms should be filed on each patient's/resident's file.

### 16.3 Allowable Expenses

Charges may be reduced or waived in order to avoid undue financial hardship having regard to the patient's/resident's financial circumstances. The following expenses may be allowable when calculating the appropriate charge:-

- Dependent child
- Life Assurance
- Medical Insurance
- Medical costs (Including prescription costs)
- Rent/Mortgage Allowances
- Loans/Repayments
- Maintenance Payments
- Travel Costs (petrol costs are not allowable under this heading)
- Rehabilitative Employment Allowance
- Other Outgoings

### 16.4 Documentary Evidence

Where expenses are being allowed as part of the assessment process, documentary evidence should be obtained and attached to the assessment file.

### 16.5 Appeals

In cases where the patient/resident or their next of kin as appropriate, are dissatisfied with the Authorised Officer's decision regarding the amount of the charge, they may appeal the decision to the relevant Appeals Officer. The patient/resident or the next of kin where appropriate, should be advised of the appeals process on being notified of the charge.



## 16.6 Refunds of Charges for Home Visits

St. Patrick's Centre makes a refund of charges to the patient/resident or next of kin as appropriate

Where the patient/resident spends a night at home. This is called a "bed night" and each "bed night" is refunded at the daily rate charged to the resident.

### **Example**

Social Welfare Weekly Payment €188

Less €33

€155/7 = daily rate of €22.14

A list of such refunds will be prepared at months-end by each sector manager and the Finance Manager will ensure that the relevant refunds are lodged back to the resident account as appropriate.

### **HSE Guidelines to Service Providers**

The Guidelines produced by the HSE in 2006 outline that Organisations should **individually assess each of its residents** to determine the amount they should be charged. The maximum amounts can be reduced if for example individuals have particular socialisation expenses (cinema, recreation, sports, and holidays) or other outgoings such as savings, health insurance, etc.

The Service Provider completes an Assessment Form with this information to determine the charge for each individual. Individuals or their families should ensure the service provider makes this Assessment Form available to them.

## St. Patrick's Centre (Kilkenny) Ltd

### 17 Summary of PPPA (Patient Private Property Accounts) Guidelines

- 17.1 St. Patrick's Centre Kilkenny Ltd., assumes the role of Trustee in the administration of the financial affairs of its Service Users where the Service User lacks capacity to administer his/her own financial affairs.
- 17.1.1 A record of these residents is held within the service and reviewed annually
  - 17.1.2 Funds held by St. Patrick's Centre Kilkenny Ltd., are safeguarded for their direct benefit and their benefit alone.
  - 17.1.3 Each Resident's ability to derive benefit from any item or service that might potentially be purchased using their funds must be assessed in the context of the User's overall Care Plan.
  - 17.1.4 For the avoidance of any doubt SPCKKLTLD cannot permit any "pooling" or "general use" of the funds of many Service Users for the general benefit of some.
  - 17.1.5 It is imperative that there is a clear audit trail distinguishing individual's transactions and funds.
  - 17.1.6 It should be noted that funds raised by St Patrick's Centre from Charges correctly levied under relevant legislation are St Patrick's Centre funds and cease to be the Resident's funds once collected.
- 17.2 Support For Staff In Making Decisions
- 17.2.1 Reference should be made to the Resident Private Property Guidelines of the HSE and the Health (Charges For In-Resident services) (Amendment) Regulations 2011).
  - 17.2.2 Staff should consult with their Sector Managers in the first instance and the request should be certified by the Sector Manager before presenting it to the Finance Manager.
  - 17.2.3 The Finance Manger should give reference to 1 and 2 above and subsequently check the PPPA that adequate funds are available.
- 17.3 Appeals
- 17.3.1 Any appeal must be made in writing to the General Manager and due consideration will be given to reference points 17.2.1 to 17.2.3 , above in dealing with appeals.