CONSUMER MONEY AND PROPERTY POLICY AND PROCEDURE

Version 2.0: July 2026

CONSUMER MONEY AND PROPERTY POLICY AND PROCEDURE

Purpose and Scope

This policy and procedure provides guidance for staff, contractors and volunteers who assist consumers to manage their financial affairs, or who have access to consumers' personal belongings. It aims to ensure staff do so in an honest, transparent, and accountable manner, and in the best interests of consumers.

The policy and procedure applies to all staff and meets relevant legislation, regulations and Standards.

Applicable Strengthened Aged Care Quality Standards

- *Standard 1. The Individual*
- *Standard 3. The Care and Services*
- *Standard 4. The Environment*

Definitions

Consumer Money - any cash, bank cards, vouchers, electronic funds, personal financial records, or other financial assets belonging to a consumer.

Consumer Property - any personal belongings owned, leased, or lawfully possessed by a consumer, including but not limited to keys, jewellery, clothing, mobility aids, assistive technology, household items, documents, and valuables.

Financial abuse – any act which involves using money, assets, property, income, or financial resources of a consumer without their full knowledge and consent for the benefit of another person. It can involve conduct that unreasonably controls, pressures, manipulates, deceives, or influences a consumer regarding their financial affairs, as well as misuse of a power of attorney. Financial abuse can be:

- theft of money or possessions
- misuse of a bank card or account
- unauthorised purchases or transactions
- pressure to provide gifts, loans, or financial benefits
- coercion to change financial arrangements, legal documents, or wills and/or
- financial coercion.

See also Bilingual Care's *Elder Abuse and Neglect Policy and Procedure*.

Lost Property - consumer property that cannot be located, accounted for, or returned following service delivery.

Property Damage - any deliberate, accidental, or negligent destruction, loss, deterioration, or impairment of a consumer's property occurring during service delivery.

Theft or Stealing - intentionally taking, using, or possessing a consumer's money or property without lawful authority, permission or the consumer's informed consent.

Valuable Item - an item with significant financial, personal, sentimental, legal, or cultural value, including cash, jewellery, collectibles, identification documents, bank cards, cheque books, wills, and powers of attorney.

Policy

Bilingual Care recognises that there is a balance between helping consumers to manage their own financial affairs as much as possible and protecting the rights of people who may be vulnerable to exploitation. Direct responsibility for managing a consumer's financial transactions should only be assumed by staff where the consumer is unable to do so themselves and there are clear directions in the consumer's *Care Plan* on what assistance can be provided to consumers.

Bilingual Care's staff must never pressure, influence, or encourage consumers to provide gifts, money, loans, inheritances, or financial advantages.

Bilingual Care has processes in place to ensure any staff access to a consumer's money or other property is managed, protected, and accounted for. Any assistance provided should promote autonomy, choice and independence as well as protect the consumer and Bilingual Care staff.

Procedures

Roles and Responsibilities

The **Leadership Team** is responsible for:

- promoting a culture of honesty, transparency, and accountability in relation to consumer money and property
- ensuring appropriate systems, policies, procedures, and controls are in place to protect consumers from loss, theft, misuse, exploitation, abuse, and financial coercion
- ensuring workers receive appropriate training regarding the handling of consumer money and property
- monitoring incidents, complaints, and trends relating to consumer money and property
- ensuring incidents are reported and managed according to Bilingual Care's *Consumer Incident Management Policy and Procedure*, and reported under the Serious Incident Response Scheme (SIRS) where required, and
- taking reasonable steps to prevent, identify, investigate, and respond to suspected financial abuse, theft, or misuse of consumer property.

The **Care Coordinator** is responsible for:

- ensuring staff understand their responsibilities regarding consumer money and property
- supporting consumers to exercise their rights, choice, dignity, and independence when managing their finances and belongings
- ensuring risk assessments and *Care Plans* identify any support required with money management or property

- monitoring compliance with documentation, authorisation, and record-keeping requirements
- promptly investigating reports of lost, stolen, damaged, or misused consumer money or property, and
- escalating incidents, complaints, and allegations, and lodging SIRS reports where applicable.

Staff are responsible for:

- treating consumer money and property with respect, care, and integrity
- respecting each consumer's right to make decisions about their money and possessions.
- following documented *Care Plans* and these procedures when providing support involving consumer money or property
- maintaining accurate records of any authorised transactions, purchases, reimbursements, receipts, or handling of consumer funds
- obtaining appropriate authorisation before undertaking any approved activity involving consumer money
- immediately reporting any loss, theft, damage, unexplained discrepancy, suspected financial abuse, or allegation involving consumer money or property
- maintaining professional boundaries at all times and not borrowing money from consumers, or accepting gifts, loans, financial benefits, or valuables, unless there is express permission from Bilingual Care, and
- cooperating with investigations relating to incidents involving consumer money or property.

Consumers are encouraged and supported to:

- exercise choice and control regarding their money and property
- inform Bilingual Care of any support they require with shopping, bill payment, banking, or management of personal belongings
- safely store and secure valuable items
- raise concerns regarding loss, theft, damage, misuse of property, or suspected financial abuse, and
- participate in decisions regarding the management of their money and belongings to the extent they wish and are able.

Where applicable, **Authorised Representatives** are responsible for:

- acting lawfully and in the consumer's best interests
- providing evidence of their authority to act on behalf of the consumer when requested
- supporting the consumer's rights, preferences, and decisions, and
- notifying Bilingual Care or reporting any concerns regarding financial abuse, missing property, or misuse of consumer funds as per Bilingual Care's *Elder Abuse and Neglect Policy and Procedure*.

Consumer Money

Where assistance in managing financial affairs is required, a *Money and Property Consent Form* must be obtained from the consumer/their representative and retained on their file. consumers' money may only be used for the purposes intended by the consumer. The arrangements for supporting consumers to manage their finances must also be clearly set out in their *Home Care Agreement* and *Care Plan*, which are to be reviewed on at least an annual basis.

Staff must support consumers to keep their funds safe and not use a consumer's electronic banking PIN number or other access codes when assisting them to manage their finances. If a consumer requires a staff member to make a purchase on their behalf, the staff member must assist them to get cash out to avoid the staff member using their PIN or access codes. If the purchase is under the maximum limit for using a PIN (usually $100), then the staff member may assist the consumer to make the purchase by tapping their card for them. A consumer may also use the tap function on their phone to make purchases. A mobile phone should be treated the same as a bankcard and the staff member must not use a pin or access code to unlock a consumer's phone but can tap the phone for them.

In circumstances where (due to frailty, illness, or similar) a consumer requests a staff member purchase goods using the consumer's cash on their behalf, staff members must immediately document in the consumer's case notes in Ezihealth, including:

- the date and time
- the total cash amount provided by the consumer
- the goods/items intended to purchase
- the staff member's name and signature and
- the consumer's name and signature.

Once the transaction is complete the staff member must immediately return the consumer's cash change (if applicable) and receipt of transaction to the consumer and document the following in the consumer's case notes in Eziplan:

- the date and time
- the total cash change amount (if applicable)
- the staff member's name and signature and
- take a photo of the receipt and upload for evidence (if possible).

A consumer's funds may only be used for the benefit of that consumer. Staff must not make personal purchases with the consumer's money or borrow money from the consumer at any time, or use any personal rewards or loyalty cards the staff member holds as part of a consumer's purchase.

While staff may share, at no cost to themselves, in meals and other special occasions that are part of a consumer's activities if invited to do so, they must pay for their own meals when solely accompanying consumers.

The use of a Companion Card is encouraged to cover the cost of entry into venues or entertainment for a staff member when they are accompanying a consumer as part of their *Care Plan*. Where a Companion Card is not available or accepted, staff must not allow a consumer or their family to pay for their entrance to any venues or entertainment. Such instances should be referred to the Managing Director, who will determine who should pay for the entry cost.

Staff must not provide consumers with financial advice or information, other than what might reasonably be required under the consumer's *Care Plan*.

More generally, in managing consumers' *financial aspects of their Support at Home funding*, the Care Partner must:

- assist consumers with budgeting and the purchase of goods and services from Bilingual Care, ensuring that as far as possible, consumers get value for money and are not taken advantage of
- monitor the appropriateness of fees asked of consumers
- monitor the appropriateness of signatories for consumers' finances

- ensure invoices and statements are provided to consumers on at least a quarterly basis, or if requested by the consumer and
- collate and securely store all current and previous checked and audited accounts and budget information.

Consumer Property

Bilingual Care does not accept liability for loss or damage to property, valuables, or essential consumer equipment, but staff must take all reasonable care in the management of consumer belongings.

Where supports are delivered in consumers' homes, reasonable wear and tear to equipment such as vacuum cleaners, toasters, kettles, etc., should be expected and it is the responsibility of the consumer to meet such costs.

When supporting consumers in the community, staff must ensure the amount of property the consumer has with them is kept to a minimum and is kept securely by the consumer (where possible) or supporting staff member when not in use.

Steps if Consumer Property is Damaged

If a staff member becomes aware that consumer property has been damaged during service delivery, they should:

1. Take immediate action to prevent further damage where it is safe to do so.

2. Ensure the consumer's immediate safety and wellbeing are not affected. Remove or isolate any damaged property that may pose a risk to the consumer or others.

3. Advise the consumer of the damage as soon as practicable. If the damage has occurred due to the staff member, apologise for the incident where appropriate, as per Bilingual Care's *Open Disclosure Policy and Procedure*.

4. Report the incident as soon as practicable to the Clinical Advisor as per Bilingual Care's *Incident Reporting Policy and Procedures*, including SIRS reporting if applicable. The incident report should include:
   - date, time and location of the incident (or when the damage was noticed)
   - description of the damage
   - any witnesses
   - actions taken immediately following the incident, and
   - where possible, take photographs showing the damage (with the consumer's consent).

5. The Clinical Advisor will need to determine the extent and impact of the damage, and attempt to confirm whether the damage was accidental, resulted from negligence, or involved theft, misuse of property, abuse or other reportable concerns.

   Any reimbursement, replacement, repair, or compensation will be considered on a case-by-case basis, having regard to the circumstances, available evidence, legal obligations, and insurance arrangements.

6. The Clinical Advisor will communicate with the consumer, or their supporter/representative, about any actions being taken in relation to the incident

(without compromising privacy and confidentiality), and inform them of the available complaints processes, as per Bilingual Care's *Feedback and Complaints Policy and Procedure*.

7. Support the consumer where practical to repair or replace the damaged property, as appropriate to the circumstances.

Reporting

Suspected or alleged financial abuse must be reported in line with Bilingual Care's *Consumer Incident Management Policy and Procedure*. Where loss or damage to a consumers' property, including money, may have involved a Bilingual Care staff member, contractor or volunteer, or occurred during service delivery, consideration must also be given to whether the incident constitutes a reportable incident under the Serious Incident Reporting Scheme (SIRS), including suspected or alleged stealing or financial coercion by a staff member, and reported to the Aged Care Quality and Safety Commission within required timeframes.

Consumers and their supporters also have access to Bilingual Care's Feedback and Complaints processes, should they wish to provide feedback or make a complaint regarding the handling of their finances or property.

Supporting Documents

Documents relevant to this policy and procedure include:

- *Consumer Incident Management Policy and Procedure*
- *Decision Making, Dignity, and Choice Policy and Procedure*
- *Elder Abuse and Neglect Policy and Procedure*
- *Open Disclosure Policy and Procedure*
- *Money and Property Consent Form*
- *Service Agreement*
- *Care Plan*
- *Staff Code of Conduct*

Monitoring and Review

This Policy and Procedure will be reviewed at least annually by the Leadership Team. Reviews will incorporate staff, consumer, and other stakeholder feedback.

Bilingual Care's *Continuous Improvement Plan* will be used to record improvements identified and monitor the progress of their implementation. Where relevant, this information will be considered as part of Bilingual Care's service planning and delivery processes.

DOCUMENT CONTROL

Version No.	Issue Date	Document Owner
2.0	06/07/2026	MD
Version History		
Version No.	**Review Date**	**Revision Description**