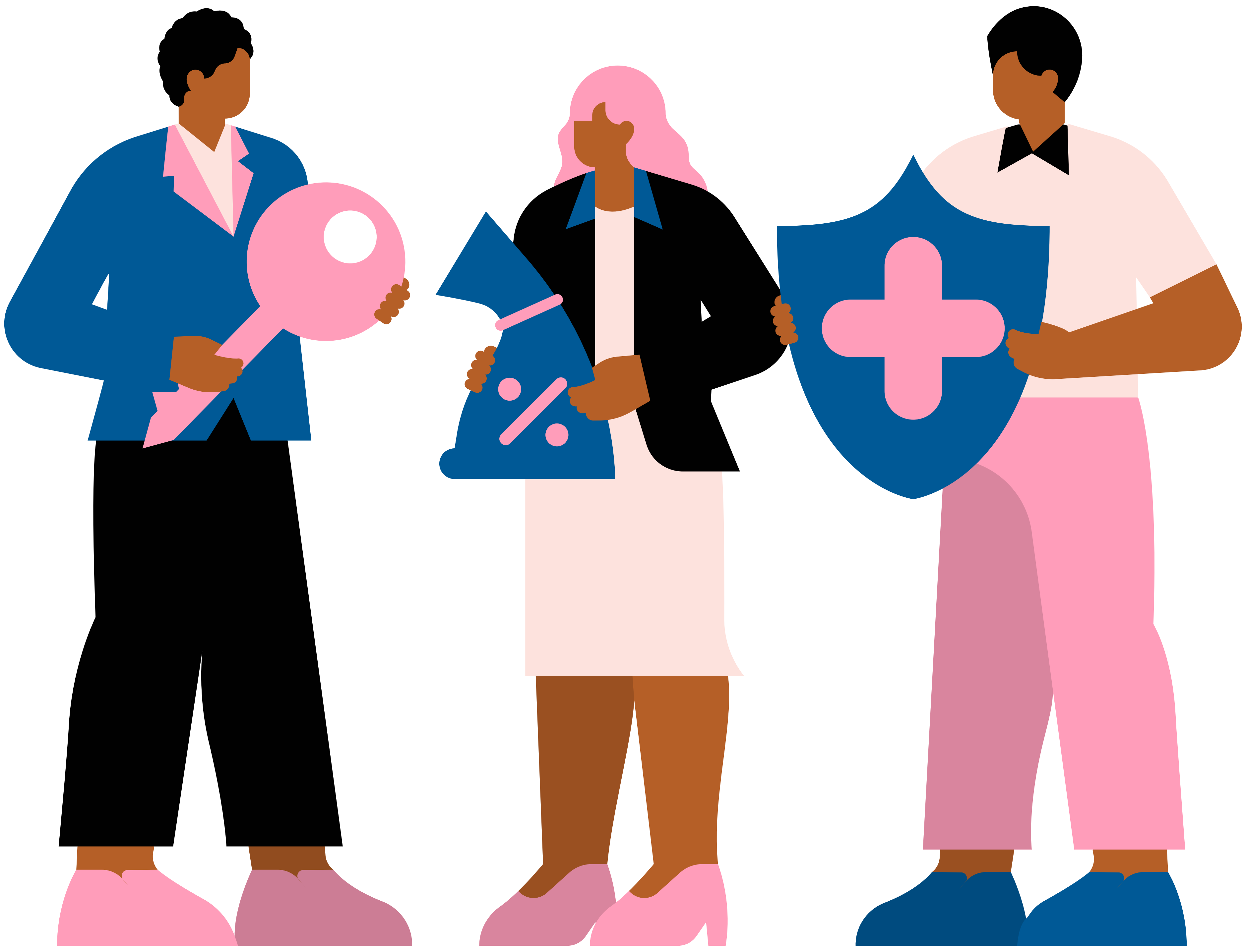
Internal Audit Guidebook No.8



Security, Transparency & Accountability

INTERNAL AUDIT GUIDEBOOKS

1. **Recording Transactions in a Money Book**
2. **Safe Contents & Weekly Safe Checks Books**
3. **Prepaid, Equals, and Bank Cards**
4. **Corporate Floats**
5. **Archiving**
6. **Monthly Manager Checks**
7. **Managing Service User Finance Incidents**
8. **Finance in Your Services:
Security, Accountability, and Transparency**
9. **Manager's Financial Guide**

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1 What is Security, Transparency, and Accountability?

Security

'Security' refers to the measures we take to ensure that service users' money is **safe** and **protected**.

For example:

- *Holding funds in a locked safe ensures that they are secure.*
- *Keeping PINs separate to bank cards ensures that they are secure.*

Keeping funds and financial information secure is essential for **preventing theft or loss** in services.

Ask yourself: is this money/information safe and protected?

Transparency

'Transparency' refers to **clear**, **honest**, and **easy to understand** practices.

For example:

- *High quality recording in money books increases transparency.*
- *You should be transparent when explaining financial arrangements.*

Transparent record-keeping is essential for making sure that **everybody understands** and is able to **identify and follow up errors or discrepancies.**

Ask yourself: would somebody else understand this?

Accountability

'Accountability' is about taking **responsibility** or being **able to hold somebody else responsible.**

For example:

- *The shift co-ordinator is accountable for the whereabouts of the keys.*
- *You take accountability for balance checks by providing a signature.*

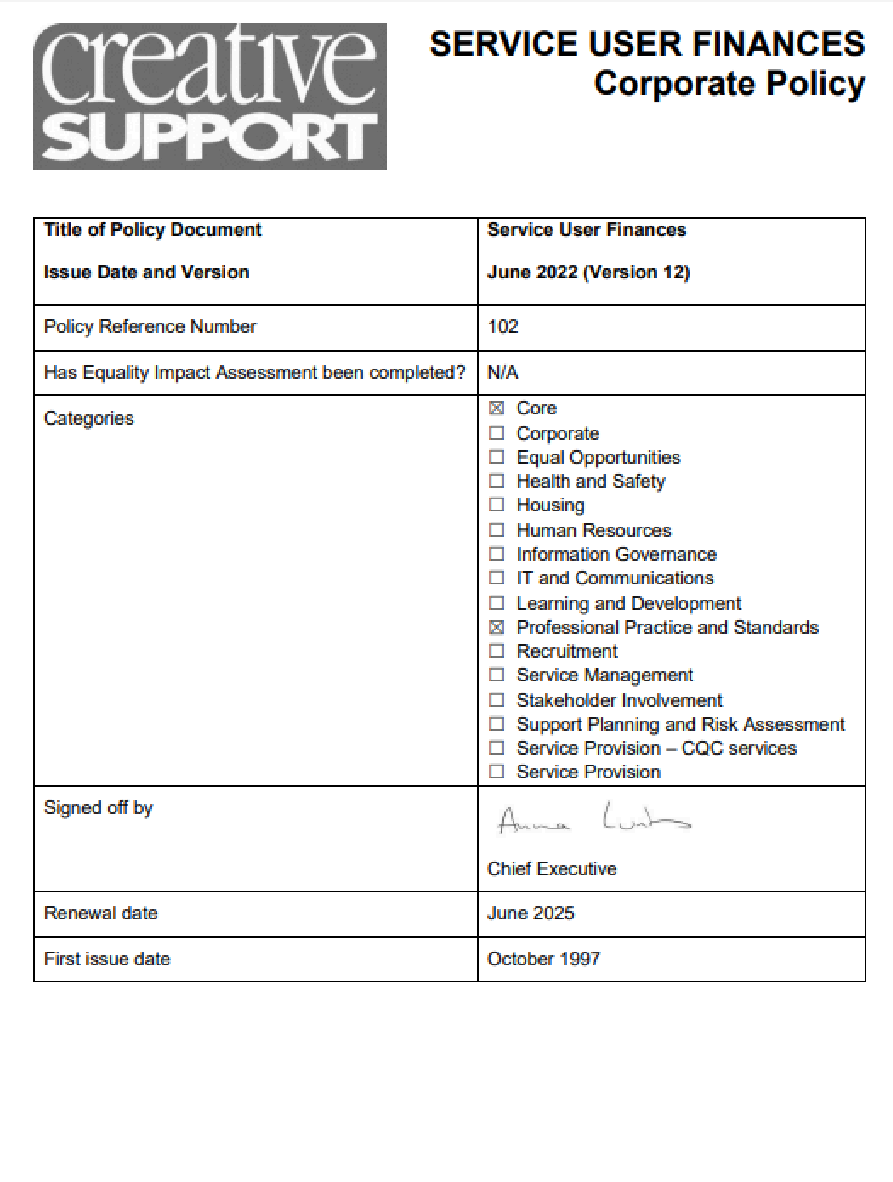
Accountability is essential for ensuring that handling and recording of money and valuables can be **traced back to one specific person.**

Ask yourself: if money went missing, would I know who last accessed it?

Keep an eye out for these colours throughout the guide to see how different practices increase security, transparency, and accountability.

2 Security

Your responsibility to ensure that service user finances, property, and financial information are secure is outlined in the following policies.



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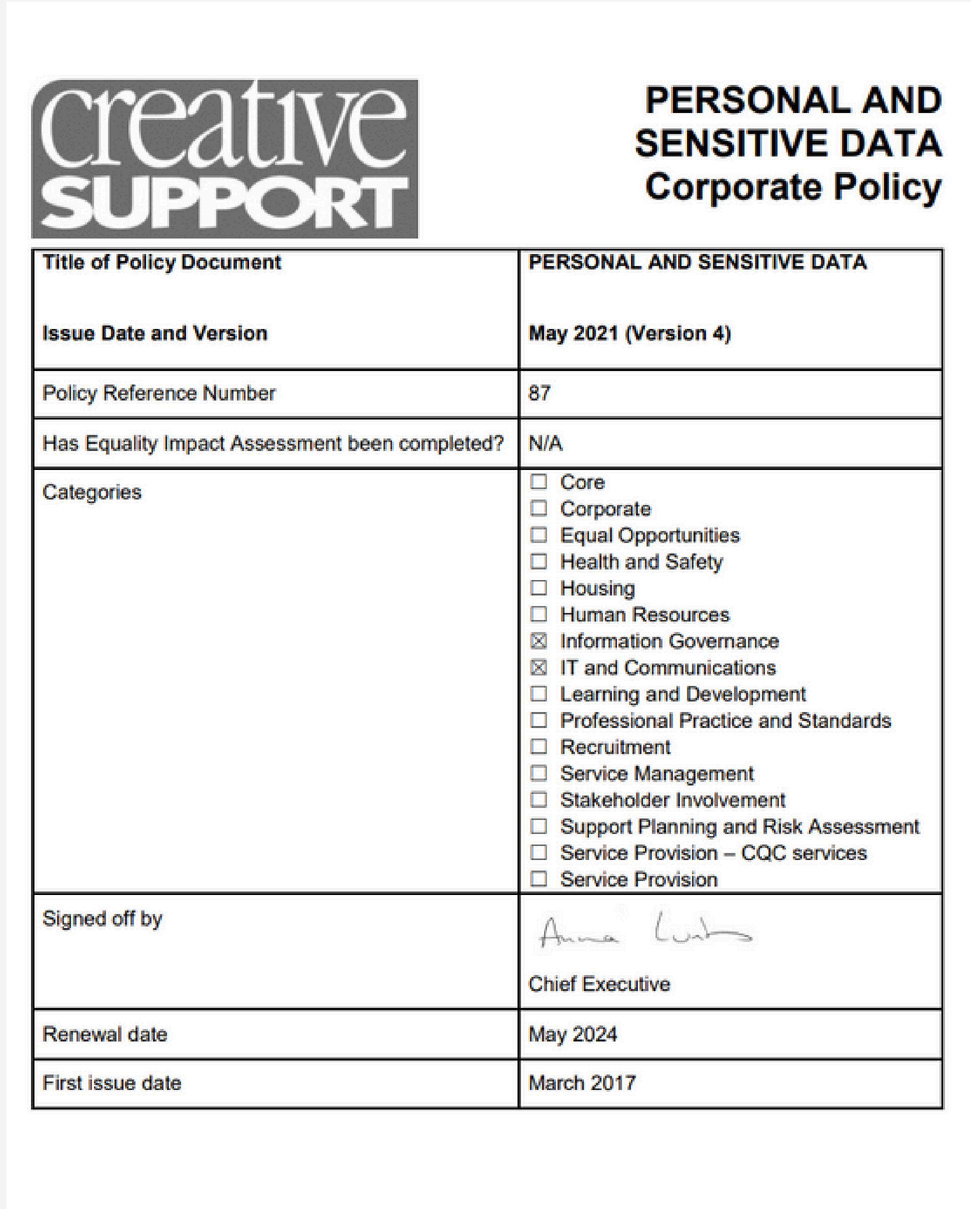
SERVICE USER FINANCES
Corporate Policy

Title of Policy Document	**Service User Finances**
Issue Date and Version	**June 2022 (Version 12)**
Policy Reference Number	102
Has Equality Impact Assessment been completed?	N/A
Categories	☒ Core ☐ Corporate ☐ Equal Opportunities ☐ Health and Safety ☐ Housing ☐ Human Resources ☐ Information Governance ☐ IT and Communications ☐ Learning and Development ☒ Professional Practice and Standards ☐ Recruitment ☐ Service Management ☐ Stakeholder Involvement ☐ Support Planning and Risk Assessment ☐ Service Provision – CQC services ☐ Service Provision
Signed off by	Chief Executive
Renewal date	June 2025
First issue date	October 1997

This policy refers to secure storage of funds and property.

This policy refers to secure storage of service user data, including financial information.



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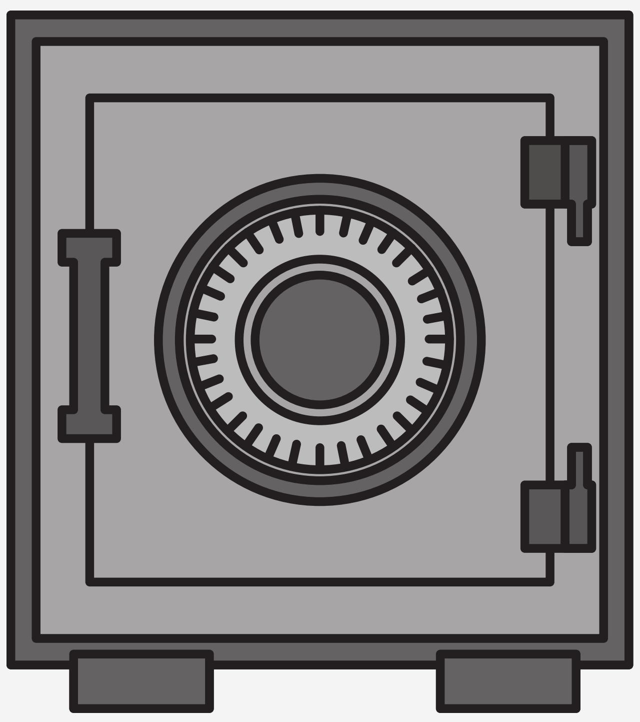
PERSONAL AND SENSITIVE DATA
Corporate Policy

Title of Policy Document	**PERSONAL AND SENSITIVE DATA**
Issue Date and Version	**May 2021 (Version 4)**
Policy Reference Number	87
Has Equality Impact Assessment been completed?	N/A
Categories	☐ Core ☐ Corporate ☐ Equal Opportunities ☐ Health and Safety ☐ Housing ☐ Human Resources ☒ Information Governance ☒ IT and Communications ☐ Learning and Development ☐ Professional Practice and Standards ☐ Recruitment ☐ Service Management ☐ Stakeholder Involvement ☐ Support Planning and Risk Assessment ☐ Service Provision – CQC services ☐ Service Provision
Signed off by	Chief Executive
Renewal date	May 2024
First issue date	March 2017

Keeping Money and Property Secure



- All service user funds must be kept in a secure location, such as a locked safe in an office, or a locked tin in a flat or bedroom.
- Valuable items like bank cards, passports, and keys should also be stored in a secure location.
- Secure locations should always be locked when not in use.
- Items held in a safe should be recorded in a safe contents book.
- For more information about how to complete this book, please refer to Guide 2: 'Safe Contents and Weekly Safe Checks'.

Secure

- There are multiple steps required for access. For example, unlocking a safe and a cash tin to access funds.
- Access is limited to authorised people, or the smallest number of people possible. For example, only the service user and their key worker know their PIN.

Not Secure

- There are no steps preventing you from accessing funds.
- Everybody has access. For example, a PIN is written down and stored in a communal area.

3 Security - Safes

Common Issue	Staff Action	Contact Details
"We have lost the safe key!"	1. **File an incident report** and **inform** your **service/on-duty manager.** 2. To access the safe contents, contact the **Maintenance team. They will contact a locksmith if required.** 3. If a new safe is required, please contact the **Health and Safety team to requisition a new safe.**	**Incidents Team** Incidents@creativesupport.co.uk **Repairs and Maintenance Team** Repairs@creativesupport.co.uk **Health and Safety Team** Health.Safety@creativesupport.co.uk
"The safe is not bolted down."	Contact the **Maintenance team** to arrange for the safe to be bolted down.	**Repairs and Maintenance Team** Repairs@creativesupport.co.uk
"My safe is holding over £750 in cash and valuables."	1. Contact the **Health and Safety team** to request a **temporary insurance increase**. 2. Check the **'Strategies to reduce the safe contents value'** for tips to reduce the amount held in the safe. 3. If you are still unable to reduce the value of the safe contents, please get in touch with the **Internal Audit team** for **further guidance.** 4. If the value of the safe contents is **not reduced** after the **temporary insurance period ends** and an additional safe is required, please contact the **Health and Safety team** to requisition a new safe**.**	**Health and Safety Team** Health.Safety@creativesupport.co.uk **Internal Audit** Internal.Audit@creativesupport.co.uk
"We have found loose change in the safe!"	Investigate and identify the owner of the money. If the owner is found, ensure this money is reimbursed and recorded into their money book.	*Not applicable.*

For full guidance on safe checks, please refer to Guide 2: Safe Contents & Weekly Safe Checks.

4 Transparency

Your responsibilities to be transparent about your dealings with service user finances are outlined in these policies.

CODE OF CONDUCT AND PROFESSIONAL BOUNDARIES
Corporate Policy

Title of Policy Document **Issue Date and Version**	**Code of Conduct and Professional Boundaries** **May 2024 (Version 13.2)**
Policy Reference Number	3
Has Equality Impact Assessment been completed?	N/A
Categories	☒ Core ☐ Corporate ☐ Equal Opportunities ☐ Health and Safety ☐ Housing ☐ Human Resources ☐ Information Governance ☐ IT and Communications ☐ Learning and Development ☐ Professional Practice and Standards ☐ Recruitment ☐ Service Management ☐ Stakeholder Involvement ☐ Support Planning and Risk Assessment ☐ Service Provision – CQC services ☐ Service Provision
Lead Person	Julie Cooke
Signed off by	Chief Executive
First issue date	October 2003
Renewal date	June 2025

This policy outlines your general duties to ensure all dealings with finance and property are honest and above suspicion.

ANTI-BRIBERY AND CORRUPTION
Corporate Policy

Title of Policy Document **Issue Date and Version**	**Anti-Bribery and Corruption** **May 2024 (Version 4.1)**
Policy Reference Number	24
Has Equality Impact Assessment been completed?	N/A
Categories	☒ Core ☐ Corporate ☐ Equal Opportunities ☐ Health and Safety ☐ Housing ☐ Human Resources ☐ Information Governance ☐ IT and Communications ☐ Learning and Development ☒ Professional Practice and Standards ☐ Recruitment ☐ Service Management ☐ Stakeholder Involvement ☐ Support Planning and Risk Assessment ☐ Service Provision – CQC services ☐ Service Provision
Lead Person	Leigh Birch
Signed off by	Chief Executive
First issue date	January 2014
Renewal date	May 2027

This policy highlights the importance of disclosing gifts to avoid bribery concerns.

SERVICE USER FINANCES
Corporate Policy

Title of Policy Document **Issue Date and Version**	**Service User Finances** **June 2022 (Version 12)**
Policy Reference Number	102
Has Equality Impact Assessment been completed?	N/A
Categories	☒ Core ☐ Corporate ☐ Equal Opportunities ☐ Health and Safety ☐ Housing ☐ Human Resources ☐ Information Governance ☐ IT and Communications ☐ Learning and Development ☒ Professional Practice and Standards ☐ Recruitment ☐ Service Management ☐ Stakeholder Involvement ☐ Support Planning and Risk Assessment ☐ Service Provision – CQC services ☐ Service Provision
Signed off by	Chief Executive
Renewal date	June 2025
First issue date	October 1997

This policy outlines the procedures which must be followed to ensure transparent record keeping. You can refer to Guide 1: 'Recording Transactions in a Money Book' for more advice.

INCIDENT REPORTING
Corporate Policy

Title of Policy Document **Issue Date and Version**	**INCIDENT REPORTING** **May 2024 (Version 11.2)**
Policy Reference Number	10
Has Equality Impact Assessment been completed?	N/A
Categories	☒ Core ☐ Corporate ☐ Equal Opportunities ☐ Health and Safety ☐ Housing ☐ Human Resources ☐ Information Governance ☐ IT and Communications ☐ Learning and Development ☐ Professional Practice and Standards ☐ Recruitment ☐ Service Management ☐ Stakeholder Involvement ☐ Support Planning and Risk Assessment ☒ Service Provision – CQC services ☒ Service Provision
Lead Person	Sam Priestley
Signed off by	Chief Executive
First issue date	January 1996
Renewal date	October 2026

This policy outlines the procedure for reporting and escalating incidents. You can also refer to Guide 7: 'Managing Service User Finance Incidents' for more advice.

Being transparent with service user finances

- All records should be clear and easy to understand.
- Transactions should be accompanied by receipts to evidence exact expenditure.
- Records and reports should reflect exactly what happened, and should not attempt to hide or cover anything up.
- You should be honest when things go wrong and own up to your mistakes so that they can be rectified.
- You should not try to cover things up, or amend records by editing the original copy.

Transparent

- Transactions are written clearly and accompanied by a receipt.
- Errors are noted in the comments box and amendments are made on the next blank row.

Not Secure

- Money is recorded out without a sufficient description or evidence of expenditure.
- Employees write over errors to amend the figures in a money book.

5 Transparency - Financial Arrangements

Keeping complete and up-to-date records of the financial arrangements of the service users you support is essential for ensuring transparency.

The Financial Arrangements Register promotes transparency by clearly showing how an individual is receiving financial support. This is important for the following reasons:

- **Having transparent records of financial arrangements supports staff to deliver financial support correctly and effectively.**
  - *For example, the records should indicate whether or not staff are authorised to hold a service user's money.*
- **Transparent records of financial arrangements allow for better checks and oversights of service user finances.**
  - *For example, if a manager notices that staff are withdrawing money using a service user's bank card, they can check whether this is approved procedure.*
- **Transparent records of financial arrangements supports better risk assessment and mitigation.**
  - *For example, if a financial arrangement disclosure highlights that funds are not secure, an auditor can contact the service and support them to resolve the issue.*
- **Transparent records of financial arrangements supports the promotion of independence and person-centred financial support.**
  - *For example, if a record indicates that an arrangement is more restrictive than necessary, the Internal Audit team can support you to review it.*

Tips for completing transparent Financial Arrangement Register records:

- **Be Clear and Concise –** Use simple language and avoid jargon.
- **Provide Full Context –** Share background information to prevent misunderstandings.
- **Update Regularly –** Keep information current and accurate.
- **Acknowledge Uncertainty –** Be honest about unknowns or pending details.
- **Encourage Questions –** Allow feedback and be open to clarifications.
- **Balance Transparency and Privacy –** Protect sensitive information while being open.

6 Transparency - Person-centred Financial Support

Being transparent also means ensuring that information is clearly laid out for service users. This is an important element of person-centred financial support.

You must never assume that a service user does not have the capacity to understand their finances unless a Mental Capacity Assessment has confirmed this to be the case.

When communicating transparently with a service user about their finances, do:

- Use straight forward language and relevant pictures, objects or illustrations to demonstrate ideas.
- Use active instead of passive language.
- Use common phrasing.
- Use literal language, not euphemisms.
- Use single words if you are confident this will benefit the person's understanding.
- Speak at the right volume.
- Speak at a routine speaking pace; slowing down often does not help a person to understand information as it creates a bigger burden on a person's memory.
- It may be helpful to pause to check understanding or show that a choice is available.
- Break down difficult information into smaller points that are easy to understand.
- Allow the person time to consider and understand each point before continuing.

When communicating transparently with a service user about their finances, don't:

- Use patronising or overly emphatic pitch or tone.
- Use childlike language.
- Use technical vocabulary.

It may be necessary to repeat, rephrase, or present information in a different way.

Be aware of and respect the following factors that may shape a person's attitude and understanding of finances:

Age
Culture
Race
Religion
Gender

It might be helpful to use tools such as communication grids, PEC tools, Easy Read guides, talking mats, and visual aids when discussing finances with some service users.

7 Accountability

Accountability = Clear and Traceable Responsibility

- It is clear who is responsible for completing a task or activity.
- It is possible to look back and check who completed a task or activity.
- People come forward to say that they completed a task or activity.

SERVICE USER FINANCES
Corporate Policy

Title of Policy Document **Issue Date and Version**	**Service User Finances** **June 2022 (Version 12)**
Policy Reference Number	102
Has Equality Impact Assessment been completed?	N/A
Categories	☒ Core ☐ Corporate ☐ Equal Opportunities ☐ Health and Safety ☐ Housing ☐ Human Resources ☐ Information Governance ☐ IT and Communications ☐ Learning and Development ☒ Professional Practice and Standards ☐ Recruitment ☐ Service Management ☐ Stakeholder Involvement ☐ Support Planning and Risk Assessment ☐ Service Provision – CQC services ☐ Service Provision
Signed off by	Chief Executive
Renewal date	June 2025
First issue date	October 1997

This policy refers to staff's responsibilities in being accountable, including proper recording of transactions and management of keys and funds.

This policy refers to staff's duty to be accountable for finance incidents which occur in services.

INCIDENT REPORTING
Corporate Policy

Title of Policy Document **Issue Date and Version**	**INCIDENT REPORTING** **May 2024 (Version 11.2)**
Policy Reference Number	10
Has Equality Impact Assessment been completed?	N/A
Categories	☒ Core ☐ Corporate ☐ Equal Opportunities ☐ Health and Safety ☐ Housing ☐ Human Resources ☐ Information Governance ☐ IT and Communications ☐ Learning and Development ☐ Professional Practice and Standards ☐ Recruitment ☐ Service Management ☐ Stakeholder Involvement ☐ Support Planning and Risk Assessment ☒ Service Provision – CQC services ☒ Service Provision
Lead Person	Sam Priestley
Signed off by	Chief Executive
First issue date	January 1996
Renewal date	October 2026

Accountable

- Staff sign their names next to transactions or balance checks.
- There are clear procedures where named people are responsible for the management of keys and funds
- Incidents or near-misses are reported.

Not Accountable

- Staff don't sign their names next to transactions or balance checks.
- There are no procedures in place for the management of keys and funds.
- Incidents or near-misses are not reported.

Lack of accountability seriously impacts the ability to investigate cases of theft or loss.

Where multiple people have access to funds or keys at any given time without clear accountability, cases are frequently dropped by the police and are challenging to investigate internally.

In cases where no staff are taking accountability, all staff will be considered as suspects.

By showing good accountability, staff protect themselves as well as the people they support.

8 Accountability - Shift-Coordination System

WHAT IS A SHIFT CO-ORDINATOR SYSTEM?

A shift co-ordinator is one staff member who is responsible and accountable for safe access during their shift. The shift co-ordinator role is recorded on a staff **rota**.
They keep **safe keys** securely on their person, such as on a lanyard, in a pocket, or in a bum bag. At the end of their shift, they **handover** to the next shift co-ordinator.

WHAT IS INVOLVED IN A HANDOVER?

1. Review the last recorded balance in relevant money books (e.g., Safe Contents book), count any money, and **confirm the balance is accurate**.
2. If the balance is not accurate, re-count the fund to confirm there is a discrepancy. If you confirm there is a discrepancy, record a comment in the money book and escalate the incident.
3. Pass the safe keys to the next shift co-ordinator.

For further guidance on how to manage and escalate finance incidents, please refer to *Guide 7: Managing Service User Finance Incidents*.

WHY DO WE NEED A SHIFT CO-ORDINATOR?

A shift co-ordinator system ensures that one person is responsible for access to safes at a time, and so limits the number of people that can access service user funds and valuables at once.
This helps to reduce the risk of loss occurring, and creates a clear record of who is accountable at any point in time for service users' funds and valuables. Should a financial incident occur, this will benefit any required investigation, and improve the likelihood of recovering loss. It also prevents implicating staff who have not had safe access when loss has occurred.

WHAT IF THE SERVICE ISN'T STAFFED 24/7?

In this case, you must requisition a PIN-coded key safe to store the safe key in.
As this is not covered by Creative Support's Service User Finances policy, you must complete a Local Policy document with director authorisation.

The PIN should be shared with a limited number of people, and changed every time a staff member leaves the service. Where possible, keys should be signed in and out of the key safe to ensure that a named person can still be held accountable.

Signature List

Sign to confirm that you have read and understood the guide to **Finances in your Services: Arrangements, Accountability, Security, and Transparency** and that you have raised and resolved any queries with the service manager or the Internal Audit team.

Print Name in Capitals	Job Role or Description	Signature