

WEST LIMERICK INDEPENDENT LIVING CLG

Handling of Service Users’ Money, Property and Gifts Policy

Policy Reference	WLILP70
Category	Operational Policies — Safeguarding and Service User Finances
Version	1.0 (new policy)
Status	APPROVED — by the Board of Directors on 9 October 2026
Supersedes	None. This is a new policy. It gives effect to the “management of service user’s money/property” safeguard listed in WLILP8 and defines the “significant gifts” limit referred to in Section 13 of WLILP5.
Policy Owner	Board of Directors, West Limerick Independent Living CLG
Applies To	All Personal Assistants, Coordinators, managers, contractors and volunteers who support service users
Related Policies	WLILP2 - Fraud and Corruption Prevention Policy; WLILP5 - Code of Standards and Behaviour; WLILP7D - Data Retention Policy; WLILP8 - Safeguarding Vulnerable Persons at Risk of Abuse Policy; WLILP11 - Financial Procedures Policy; WLILP17 - Consent Policy; WLILP21 - Credit and Debit Card Policy; WLILP22 - Protected Disclosures Policy; WLILP30 - Incident Management and Reporting Policy; WLILP40 - Person Centred Planning Policy; WLILP52 - Induction Policy; WLILP55 - Disciplinary Policy; WLILP68 - Care Planning and Review Policy
Review Cycle	Annually, or sooner if legislation, HSE requirements or WLIL’s service model changes

1. Purpose and Scope

The purpose of this policy is to protect service users from financial abuse, and to protect Personal Assistants (PAs) and other staff from mistakes and false allegations, by setting clear limits on what staff may do with a service user’s money, cards, property and gifts.

The money and property of a service user belong to the service user. Service users decide how to spend their own money. Staff help only where the service user asks for that help and where it is agreed in their care plan.

This policy applies whenever a member of staff handles, or is asked to handle, money or property belonging to a service user, or is offered a gift by a service user or a member of their family. It does not cover WLIL’s own funds or WLIL payment cards, which are dealt with in WLILP11 and WLILP21.

2. Legislative and Regulatory Framework

- Assisted Decision-Making (Capacity) Act 2015 — every adult is presumed to have capacity, and support with decisions must respect the person’s will and preferences
- Criminal Justice (Theft and Fraud Offences) Act 2001 — theft and deception offences
- Succession Act 1965 — rules on the making and witnessing of wills
- Data Protection Act 2018 and GDPR — financial records about a service user are personal data (see WLILP7A–7D)
- Draft National Standards for Home Support Services (2024) (HIQA) — protection of service users from abuse, including financial abuse

- HSE safeguarding requirements, as applied through WLILP8

3. Roles and Responsibilities

- **Service user:** decides how their own money is spent and is entitled to see their money record at any time
- **Personal Assistant:** follows this policy, records every transaction, and reports any concern or discrepancy the same day
- **Coordinator:** checks money records, deals with discrepancies and gift reports, and arranges a review of support where a service user needs help with money
- **Manager:** approves any exception, decides on gifts above the limit, carries out sample audits and reports to the Board
- **Board of Directors:** approves this policy and receives assurance that it is working

4. Handling a Service User's Money

4.1 What a Personal Assistant may do

- Buy items such as groceries for a service user, at the service user's request and where this is part of the agreed care plan (WLILP68)
- Hold cash given by the service user for that purchase only, up to the limit in Section 4.3
- Pay by contactless ("tap and go") up to the limit in Section 4.3, using the service user's card or device. This is safe for everyday shopping because no PIN is needed
- Return the receipt and any change to the service user, and record every transaction as set out in Section 5

4.2 What a Personal Assistant must never do

- Know, ask for, be given, write down or use a service user's **PIN**, passwords or online banking details
- Hold or use a service user's **bank card or debit card** that requires a PIN, a **credit card**, or a **cash card** (for example an ATM card)
- Withdraw cash from an ATM or bank on behalf of a service user
- Be a **signatory** on a service user's account, be a joint account holder, sign cheques, or have any access to online or mobile banking
- Arrange or advise on **investments**, loans, credit agreements, insurance or savings products for a service user
- Borrow money from, or lend money to, a service user (see WLILP5)
- Use a service user's money, card or property for their own purposes, or for another service user
- Use their own money to pay for a service user, or keep any change, tip or "rounding"
- Take part in a service user's **will, power of attorney, property or inheritance** matters, including acting as a witness or being named as a beneficiary

4.3 Limits

The contactless ("tap and go") payment method is permitted only within the limits below. If a payment terminal asks for a PIN, the PA must stop. The service user may enter their own PIN, or the purchase does not go ahead. The PA must never enter, or be told, the PIN.

- Maximum cash a PA may hold for a service user at any one time: no more than the amount the service user hands over for that specific purchase; no float is held
- Maximum value of a single contactless purchase: the card's own contactless limit, as set by the bank
- The service user's card or device is handed to the PA only for the purchase and is **returned immediately afterwards**. It is never kept between visits or overnight
- The PA keeps the service user's cash separate from their own money, and returns any change or unspent cash to the service user at the end of the shop or visit. It is never kept overnight.

Any request to go beyond these limits, or to handle money in any way not listed in Section 4.1, must be referred to the Coordinator before the PA acts. Only the General Manager may approve an exception, and it must be recorded in the care plan.

5. Recording Money Transactions

Every transaction involving a service user's money must be recorded in the service user's money record (money book) (Appendix A), or another record approved by WLIL. The entry is made at the time of the transaction or immediately afterwards, and must show:

- Date and time
- Amount given to the PA by the service user, or the card or device used for a contactless purchase
- What was bought, or the purpose
- Amount spent, amount of change returned, and the running balance where cash is held
- The receipt, which is kept with the record
- The PA's signature and, wherever the service user is able, the service user's signature or initials. Where they cannot sign, the record notes how they confirmed the transaction

Where possible, cash is counted with the service user before it is handed over and again when the change is returned. Records and receipts are kept in line with WLILP7D - Data Retention Policy.

6. Discrepancies and Concerns

- If money, a receipt or change does not reconcile, or a card or cash cannot be accounted for, the PA must tell the service user and the Coordinator **the same day**
- The PA must never cover a shortfall from their own pocket or alter a record to make it balance
- The Coordinator records the matter as an incident using the process in WLILP30 and decides whether it must be screened as a safeguarding concern under WLILP8
- Any staff member who suspects that money is being misused, by anyone, must report it under WLILP8. Protection for those who raise concerns is set out in WLILP22 - Protected Disclosures Policy, and fraud is dealt with in WLILP2

7. Gifts

7.1 Accepting small gifts

This section sets the limit for "significant gifts" in Section 13 of WLILP5. A member of staff may accept a gift from a service user or their family only if **all** of the following apply:

- The gift is worth **€100 or less**

- It is unsolicited, and the staff member has not hinted at or requested it
- It is not cash or a cash equivalent, such as a voucher or cheque
- It is not offered in return for, or in the expectation of, special treatment
- It is reported to the Coordinator and entered in the Gift Register (Appendix B) within two working days

7.2 Gifts above €100

Gifts worth more than €100 must be politely declined. Where declining would cause real distress to the service user, the staff member may accept the gift on behalf of WLIL, must tell the Coordinator the same day, and must not keep it. The General Manager then decides, with the service user's agreement, whether to return it. The decision is recorded in the Gift Register.

7.3 What is never acceptable

- Asking for gifts or money
- Cash or cash equivalents of any amount
- Gifts of property, vehicles or jewellery, loans, or being named in a will or as a beneficiary
- Any gift connected to a decision that affects the service user's support

If a service user says they wish to leave something to a staff member, the staff member must tell the Coordinator. The General Manager will decide whether the service user should be encouraged to seek independent advice.

7.4 Repeated or growing gifts

Gifts that are each under the limit must still be reported. The Coordinator reviews the Gift Register for patterns, such as repeated or increasing gifts from the same service user, and treats these as possible indicators of undue influence under WLILP8.

8. Service Users Who Need Extra Support with Money

Where a service user finds it hard to manage money, a PA must not take over. The Coordinator arranges a person-centred review (WLILP40, WLILP68) involving the service user and, where they wish, family, an advocate or a decision-making assistant. Options such as support from the Money Advice and Budgeting Service (MABS) can be explored.

Where a service user has a decision-making representative or an attorney under the Assisted Decision-Making (Capacity) Act 2015, the Coordinator, not the PA, checks the documents and the scope of that person's authority. A PA must never decide whether a service user has capacity. Concerns are raised with the Coordinator.

9. Safeguarding

Financial abuse is one of the forms of abuse covered in WLILP8. Staff must be alert to the indicators listed there, including missing money or valuables, incomplete records of spending, and pressure on a service user about wills, property or financial transactions. Any concern is reported immediately in line with WLILP8.

10. Training and Competence

This policy is covered at induction (WLILP52), and every PA must confirm in writing that they have read and understood it before handling any service user's money. Refresher guidance is given through supervision and annual training.

11. Monitoring and Audit

- The Coordinator checks each service user's money record against receipts at least monthly, wherever money has been handled
- The General Manager carries out sample audits of money records and the Gift Register at least quarterly
- The General Manager reports the outcome, and any incidents, to the Board as part of WLIL's regular risk reporting

12. Non-Compliance

A breach of this policy will be dealt with under WLILP55 - Disciplinary Policy and, where it involves possible theft, fraud or abuse, may also be referred to An Garda Síochána and the HSE in line with WLILP8.

13. Review and Updates

This policy is reviewed annually, or sooner if legislation, HSE requirements or WLIL's service model changes. The limits in Sections 4.3 and 7.1 are reviewed at each review.

Appendix A — Service User Money Record

Service user: _____ Kept by: Service user's home / Coordinator (delete one)

Date / time	Cash or card given	Purpose / items	Amount spent	Change returned	Balance	Receipt attached	PA signature	Service user initials

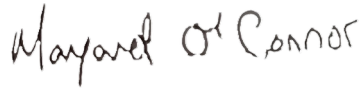
Appendix B — Gift Register

Date	Staff member (role)	Service user	Gift description	Approx. value	Reported to / date	Decision (if over €100)

Approval

Approved by the Board of West Limerick Independent Living CLG on 9 October 2026.

Signed on behalf of the Board, on its instruction, by the General Manager:



Margaret O'Brien O'Connor, General Manager

Date signed: 09-10-2026