



# Participant Money Management Policy

*For Soaring Sparrows Pty Ltd*

## Document Control

- Policy Title: Money Management Policy
  - Date Policy Developed: 19/09/2025
  - Review Date: 19/09/2026
  - Version: 1.0
  - Policy Owner: Director, Soaring Sparrows Pty Ltd
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## 1. Purpose

This policy outlines the role and limitations of Soaring Sparrows Pty Ltd in relation to participant finances. We are committed to upholding ethical, legal, and professional boundaries. We support participants to manage their finances safely and independently, or with appropriate formal or informal supports.

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## 2. Scope

This policy applies to:

- All employees, contractors, and representatives of Soaring Sparrows Pty Ltd.
  - All participants engaged in Support Coordination services.
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## 3. Definitions

- **Financial Administrator** – A person appointed by the South Australian Civil and Administrative Tribunal (SACAT) to make financial decisions on behalf of a participant who cannot do so safely.
- **Informal Financial Supports** – Trusted family members, friends, or carers who assist a participant with financial tasks without formal appointment.
- **Plan Manager** – An NDIS-registered provider who manages NDIS funds on behalf of a participant, paying providers and helping track budgets.

- **SACAT** – The South Australian Civil and Administrative Tribunal, which can appoint administrators or guardians for people who need decision-making support.
  - **Financial Abuse** – When someone takes or uses a participant's money, property, or assets without consent, or pressures them into financial decisions that are not in their best interest.
  - **Splose** – The client management system used by Soaring Sparrows Pty Ltd to record case notes, risks, and actions.
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## **4. Policy Statement**

### **4.1 No Access to Participant Money**

Soaring Sparrows Pty Ltd does not manage, handle, or have access to participant's personal money, including:

- Bank accounts
- Cash holdings
- NDIS plan funds (other than viewing allocations via the myplace portal or participant-provided data)
- Payments for goods or services

Staff must not accept cash or hold financial authority over any participant account.

### **4.2 No Financial Advice Provided**

Soaring Sparrows Pty Ltd does not provide financial advice, including:

- Investments, savings, or tax advice
- Superannuation or insurance products
- Financial planning or debt management advice

Participants requiring advice will be referred to qualified professionals or financial counselling services.

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## **5. Responsibilities**

### **Director/Management**

- Ensure staff understand financial boundaries.

- Provide training on identifying and reporting financial risks.
- Respond to breaches and report where required.

### **Staff/Contractors**

- Never handle participant money or provide financial advice.
- Report suspected financial abuse immediately.
- Support participants to access Plan Managers, financial administrators, or advocates.
- Record all financial concerns or risks in Splose.

### **Participants and Families**

- May choose to involve informal supports in financial decision-making.
  - Will be supported to access formal safeguards if financial risks are identified.
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## **6. Procedures**

### **6.1 Supporting Participants with Money Management Needs**

- Encourage appropriate safeguards (Plan Managers, informal supports, or SACAT Administrators).
- Work collaboratively with families, advocates, and other professionals.
- Document all actions in Splose.

### **6.2 Responding to Financial Vulnerability**

- Identify concerns about financial exploitation.
- Support participants to understand options, including SACAT applications.
- Refer to the Public Advocate or legal advocates if necessary.
- Escalate concerns to management.

### **6.3 Risk Management**

- Record all financial risks and actions in Splose.
- Communicate with supervisors.
- Monitor risks through ongoing support planning.

### **6.4 Escalation Process for Suspected Financial Abuse or Mismanagement**

### Step 1 – Identify and Document

- Staff who observe or suspect financial abuse, exploitation, or mismanagement must:
  - Record the concern immediately in Splose.
  - Include details of what was observed, reported, or suspected.
  - Avoid making assumptions or judgments – record only facts.
  - Update the Risk Awareness Assessment and/or complete an Incident Report.

### Step 2 – Immediate Reporting to Management

- Staff must notify their direct supervisor or the Director **within 24 hours** of identifying the concern.
- If the allegation involves a staff member, report directly to the Director and do not confront the person involved.

### Step 3 – Risk Assessment and Action

- The Director will:
  - Assess the level of risk to the participant.
  - Decide if urgent protective action is required (e.g., alerting family, advocates, or emergency services).
  - Ensure the participant's safety, rights, and dignity are prioritised.

### Step 4 – Escalation to External Authorities

- If financial abuse is suspected or confirmed, the Director will:
  - Notify the **NDIS Commission** as a reportable incident if applicable.
  - Apply to the **Office of the Public Advocate** or **SACAT** for consideration of an Administrator where required.
  - Report to **SA Police** if fraud, theft, or criminal behaviour is suspected.
  - Report to the **SA Adult Safeguarding Unit** if appropriate
  - Support the participant and their family to access legal or advocacy services.

### Step 5 – Follow-Up and Monitoring

- All actions, referrals, and communications must be:

- Documented in Splose.
  - Reviewed by the Director.
  - Monitored as part of the participant's ongoing risk and support planning.
- Staff may be required to attend case review meetings or provide statements to investigators.

#### **Step 6 – Feedback to Participant**

- The participant (and/or their representative) will be:
    - Informed of the steps taken, unless doing so would place them at further risk.
    - Supported to understand their rights and complaint options under the NDIS Complaints process.
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### **7. Staff Training**

All staff will be trained at induction and regularly thereafter on:

- Boundaries around participant finances.
  - Mandatory reporting of suspected financial abuse.
  - Referral pathways for advocacy and administration.
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### **8. Breaches**

Breaches of this policy (handling money, giving financial advice, or failing to report abuse) may result in:

- Internal investigation.
  - Disciplinary action, including termination.
  - Reporting to the NDIS Commission or relevant authority.
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### **9. Related Legislation and Standards**

- NDIS Act 2013
- NDIS Code of Conduct 2018
- NDIS Practice Standards 2018

- Guardianship and Administration Act 1993 (SA)
  - Fair Work Act 2009 (Cth)
  - Work Health and Safety Act 2012 (SA)
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## **10. Related Documents**

- Participant Rights and Responsibilities Policy
  - Privacy and Confidentiality Policy
  - Incident Management Policy
  - Complaints and Feedback Policy
  - Risk Management Policy
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## **11. Review**

This policy will be reviewed annually, or earlier if:

- Laws or NDIS requirements change.
  - An incident, audit, or complaint highlights gaps.
  - Feedback indicates improvements are required.
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## **12. Approval**

Approved By: Kathryn Soar

Position: Managing Director, Soaring Sparrows Pty Ltd

Date: 27/09/2025