

**CITY OF HAMILTON
CITY-WIDE CASH HANDLING POLICY**

PURPOSE

The purpose of the Cash Handling Policy is to define the acceptable level of control for Cash Handling operations for all City departments to ensure clear and consistent practices within the City for the handling of cash. This policy is designed to avoid fraudulent activity in the handling of City cash and to prevent and minimize the risk to City employees when handling cash.

SCOPE

This policy applies to all City of Hamilton operating departments with employees, staff, volunteers, students, elected officials, contractors, consultants, boards, agencies, commissions and business partners who accept cash on behalf of the City and whose financial transactions are captured within the City's financial system.

DEFINITIONS

"Cash" is defined as coin, currency, cheques, money orders and credit/debit card transactions.

"Cash Handling Location" is defined as a location that accepts cash from citizens, residents, clients or customers.

"Cashier" is defined as any employee who performs the function of receiving, transmitting, safeguarding and/or depositing City cash.

"Segregation of Duties" - No single person handles a transaction from beginning to end. If one person does perform two or more of these functions, there is no independent check for mistakes, and errors and/or irregularities are very likely to go undiscovered for long periods. If possible, different people within a cash handling operation should perform the following four basic functional categories:

- Authorization or approval of transactions
- Recording of transactions
- Custody of funds
- Monitoring to ensure compliance with control procedures

It is not always practical for the City to maintain strict Segregation of Duties due to limited staff size and additional control measures that can be used to assist in this area are outlined in Schedule "A" - Cash Handling Guidelines.

"Cash float" is a fund that is issued for the purpose of making change for a cash transaction.

- Money from the float should not be retained or expended to pay invoices or miscellaneous expenses, replenish petty cash or make loans or

advances or used to cover cash drawer differences (Over/Short). The cash float should never change in value, only in denomination count.

SECURITY CONTROL REQUIREMENTS

All cash handling locations are required to have a safe on site that provides the appropriate burglary protection. The safe must be kept in a private area with restricted access. Access may be restricted by limiting those with access to keys or knowledge of the combinations. Access should be granted based on the employee's job duties.

- Cashiers are provided with individual secured cash drawers and floats.
- Bank deposits must be made on a regular basis as follows:
 - Less than \$25,000 collected annually must be deposited at a minimum on a weekly basis
 - Over \$25,000 collected annually must be transported to the bank by the city's contracted armoured car service as follows:
 - Over \$25,000 collected annually = Weekly
 - Over \$100,000 collected annually = Bi-weekly
 - Over \$500,000 collected annually = Daily

Due to the seasonality of some city operations, deposit frequency may vary. While operating, these locations must implement armoured car pick-ups as outlined above. In order to be exempted from using the armoured car service the department must forward a written request, describing the reason for the exemption, to the General Manager of Finance and Corporate Services for authorization.

Sections that have been approved to deposit directly to a designated bank must use pre-encoded deposit slips and record the deposit slip number in the header field on the journal entry processed to record the transactions. In order to prevent and minimize the risk of violence against City employees, the following safeguards must be in place when delivering deposits to the bank:

- Delivery routines must vary. (Routines can be observed, so do not make cash handling or bank deposits part of a routine).
- Monies held overnight must be secured in a safe.
- Health and safety training, including receiving, transmitting, safeguarding and/or depositing City cash must be provided to all cashiers.

RESPONSIBILITIES

To ensure proper and consistent cash handling practices across the organization the requirements outlined in this policy must be adhered to and the guidelines outlined in Appendix "A" must be incorporated in all cash handling procedures.

General Managers have the responsibility to:

1. Require clearly written and approved procedures for all areas of their department's Cash Handling locations. The procedure must:
 - Comply with the requirements of this policy
 - Incorporate the appropriate controls that are outlined in the Cash Handling Guidelines (Appendix A).
 - Include the ability to ascertain individual accountability and ensure the safeguarding of City funds.
 - Must be reviewed and updated annually.
2. Ensure that the required security equipment and services that are outlined in this policy are in place (safes, cash drawers, deposit pick-ups).
3. In the event of a loss, assure compliance with the procedures detailed in the City's Fraud Policy and Protocol.
4. Consult with Financial Services regarding new cash handling processes before implementation (e.g. credit cards, e-commerce, etc.)
5. Ensure that the required training has been provided to all staff performing cash handling functions.

Cash Handlers have the responsibility to:

1. Comply with cash handling procedures developed for and implemented in their respective service areas.
2. Report to their departmental management, or the General Manager of Finance and Corporate Services, any instance that is deemed to be a serious failure to give proper care to employee safety, cash, securities or other valuables, whether or not such failure has resulted in a loss.

COMPLIANCE

Failure of staff to comply with this Cash Handling Policy could result in disciplinary action.

SCHEDULE "A"
CITY-WIDE CASH HANDLING GUIDELINES

PURPOSE

The purpose of this document is to provide guidelines to:

- Promote proper and consistent cash handling practices across the organization;
- Establish a system of internal controls for cash handling to prevent mishandling of such funds; and
- Assist in strengthening the security over cash receipts within the City of Hamilton.

SCOPE

These guidelines should apply to all City of Hamilton operating departments with employees, staff, volunteers, students, elected officials, contractors, consultants, boards, agencies, commissions and business partners who accept cash funds on behalf of the City and whose financial transactions are captured within the City's financial systems.

These guidelines do not include controls pertaining to cheque payments, debit or credit card payments or the use of petty cash funds.

DEFINITIONS

Bonding of Employees – Agreement under which a bonding or insurance company guarantees payment of a certain amount as damages in the event that one or more employees covered in the agreement cause financial loss to the City.

Cash – Canadian and US currency, bills, coins, cheques, money orders and credit/debit card transactions.

Cashier – Employee, staff, volunteer, student, elected official, contractor, consultant, board, agency, commission or business partner assigned cash handling responsibilities.

PeopleSoft Financial System – Accounting software utilized by the City of Hamilton to record financial transactions.

Point of Sale System – A computer used in place of a cash register to record transactions, handle credit and/or debit payments and print receipts and reports.

Refund – Reimbursement to a customer for returned, cancelled or unsatisfactory goods or services after the original purchase transaction is completed.

Segregation of Duties – Internal control concept in which the same employee does not have responsibility for incompatible activities such as handling cash and recording and reconciling transactions.

Transaction Log – Manual record used to record transactions.

Voided Transaction – Reversal of an item entered into a cash register or point of sale system before the purchase transaction is completed.

CASH HANDLING GUIDELINES

Segregation of Duties

One employee given responsibility to collect cash, record transactions and/or reconcile daily cash activity has the opportunity to misappropriate cash and conceal the shortage in the accounting records.

No individual should have responsibility for both collecting cash and:

- Opening the mail;
- Depositing cash receipts;
- Recording or approving journal entries within the PeopleSoft Financial System;
- Performing bank reconciliations;
- Issuing invoices or posting payments within the PeopleSoft accounts receivable module;
- Initiating, approving or recording accounts receivable write-offs or other adjustments;
- Reconciling the numerical continuity of manual customer receipts, where applicable; and
- Using discretion as to whether a related charge will be levied and/or the amount of the charge.

Where segregation of duties is not practical, additional compensating controls and mitigation practices such as managerial oversight are required to reduce the risk of loss.

Cashiers should not carry out cash handling duties for at least one consecutive week per year. This may be accomplished through mandatory vacation, job rotation or other means. Such a routine may help to identify unusual or questionable practices of the regular cashiers.

Receiving and Recording Cash Payments

An incomplete record of cash transactions and adjustments provides an opportunity to misappropriate cash and omit the shortage from the accounting records.

Counterfeit and mutilated currency is not legal tender and should not be accepted. A counterfeit detection device should be used to identify forged currency. Where it is not practical to purchase or use such equipment, cashiers should be adequately trained in using common security features to identify counterfeit money.

All cash payments should be entered into the cash register or point of sale system immediately upon receipt from the customer. Where it is not practical to use a cash register or point of sale system, the cash payment should be recorded using pen in a transaction log which documents at a minimum the date, amount, type and purpose of the payment received.

Adjustments made to standard prices (e.g. coupons, discounts or rebates) or fee waivers should be captured separately from the purchase price. Documentation supporting the adjusted price or fee waiver should be retained. Adjustments or fee waivers appearing on the cash register summary tape, point of sale system report or manual transaction log at the end of the cashier's shift should be reconciled to supporting documentation retained. Management should review and approve price adjustments and fee waivers by the following business day or at least on a monthly basis. Management should investigate inappropriate price adjustments and fee waivers or those for which no supporting documentation exists. The investigation should include an assessment of unusual patterns.

A receipt should be printed from the cash register or point of sale system and provided to the customer for all payments received. A manual receipt should be prepared where it is not practical to use a cash register or point of sale system. The cash register, point of sale system or manual receipt should indicate at a minimum the transaction date, sequential transaction or receipt number, purpose of the payment, amount received and type of payment.

Manual receipts should be issued from a sequentially pre-numbered receipt book in numerical order. Spoiled receipts should be marked "VOID" and retained in the receipt book. Management should account for the numerical sequence of receipt numbers on a quarterly basis and when a new receipt book is requested. At a minimum, manual receipts should be produced in duplicate – one copy is provided to the customer and one copy is retained in the receipt book for accounting purposes. Where it is not practical to issue manual receipts for small dollar transactions, additional management review and oversight is required to ensure cash receipts are complete.

All cash payments should be collected by the cashier at a central location. Where this is not practical (e.g. donation box, vending machine), two employees should collect and count the funds, document the count, initial the form and observe the cashier enter the funds into the cash register, point of sale system or manual transaction log. The initialed form documenting the count should be retained. Such sales appearing on the cash register summary tape, point of sale system report or manual transaction log at the end of the cashier's shift should be reconciled to the initialed form documenting the count. Management should investigate documented funds not recorded in the cash register, point of sale system or transaction log.

Refunds and Voided Transactions

Lack of documentation and management oversight provides an opportunity to process an unfounded refund or void transaction for cash and misappropriate the funds.

Each department should develop and implement a refund policy as appropriate to its operations. Each policy should adhere to the following minimum requirements.

All refunds and voided transactions should have the following supporting documentation:

- Transaction date;
- Customer name, address, phone number and signature;
- Original customer receipt (where available);
- Reason for the refund or voided transaction;
- Amount and form of payment;
- Signature of the cashier issuing the refund or void; and
- Signature of the supervisor approving the transaction.

Total refunds and voided transactions appearing on the cash register summary tape, point of sale system report or manual transaction log at the end of the cashier's shift should be reconciled to the supporting documentation outlined above. Management should investigate refunds and voided transactions for which no supporting documentation exists.

Refunds should be returned using the same payment method as the original payment. For example, if the original payment was made using a VISA credit card, the refund must be returned to the same VISA credit card. If a cash refund will deplete all or part of the cash float, the refund should be requested by City of Hamilton cheque.

Cashiers should not have the ability to process a refund or voided transaction without management approval. Where it is not practical to obtain approval at the time of the transaction, management should review and approve refunds and voided transactions by the following business day or at least on a weekly basis. The review should include an assessment of unusual patterns.

Receipts Reconciliation

Lack of management oversight and a proper receipts reconciliation process creates an opportunity to misappropriate cash and conceal the shortage.

Cash, cheque, debit and credit card receipts on hand should be counted and reconciled to amounts recorded in the cash register, point of sale system or transaction log at the end of the cashier's shift.

Cash appearing on the cash register summary tape, point of sale system report or manual transaction log covering the shift period should be compared to the actual amount of cash on hand once the float balance when utilized, is removed. Cash shortages or overages should be identified and explained. The receipts reconciliation should be documented, re-performed and reviewed by management and signed by both the cashier and management as evidence that the reconciliation is complete and accurate. Where it is not practical for management to review the receipts reconciliation, a second employee who did not participate in the particular cash handling activities may act on management's behalf.

Management should summarize cash shortages and overages by employee, date and amount. Management should review this summary at least on a monthly basis in order to identify trends or significant cumulative discrepancies.

Each operating department should define the dollar threshold for a significant single or cumulative cash shortage or overage. Significant shortages and overages should be brought to management's attention, investigated, documented and resolved. At a minimum, documentation should contain a description of steps taken to investigate the shortage or overage and what action (if any) was taken by management.

The float and cash awaiting deposit should be stored in a secure location with limited access. The cashier should not have access to cash awaiting deposit after the receipts reconciliation is complete.

Deposits

Large amounts of cash stored on-site for an extended period of time provides an opportunity to misappropriate, skim or lap funds.

All funds should be deposited intact. No cash receipts should be retained or expended to pay invoices or miscellaneous expenses, replenish petty cash or

make loans or advances. Cash back for debit or credit card purchases must not be allowed.

Deposits should occur as outlined in the Cash Handling Policy. At a minimum, deposits should occur on a weekly basis. Cash awaiting deposit should be stored in a secure location with limited access.

Deposits that do not occur on a daily basis should be reconciled to the amount of cash receipts recorded for the days captured by the deposit. Cash appearing on the cash register summary tape, point of sale system report or manual transaction log covering the deposit period should be compared to the actual amount of cash on hand. Differences that were not previously identified as part of the receipts reconciliation process should be brought to management's attention, investigated, documented and resolved. The deposit reconciliation should be reviewed by management and signed by both the employee and management as evidence that it is complete and accurate.

A bank deposit slip should be prepared for the actual amount of cash on hand. The deposit amount should match the amount of cash appearing on the receipts reconciliation or deposit reconciliation. The deposit should be re-counted and bank deposit slip reviewed by management. The bank deposit slip should be signed by both the employee and management as evidence that the reconciliation is complete and accurate. At a minimum the bank deposit slip should be produced in triplicate – two copies are remitted to the bank with the deposit and one copy is retained by the department. The deposit and two copies of the bank deposit slip should be sealed in a bank deposit bag. The deposit should occur the same day on which it is prepared.

Bank deposits should be picked up by an armoured car service. Where armoured car service is not available, the deposit should be escorted to the bank by a City employee. Cash should not be sent through mail or inter-office mail for deposit.

Deposits picked up by an armoured car service should be recorded using pen in a pickup log which documents, at a minimum, the date, deposit bag number, deposit amount, initials of the City employee releasing the deposit and initials of the armoured car driver taking custody of the funds. The identification of the armoured car driver should be compared against a list of authorized personnel before releasing the deposit.

Bank Reconciliation

Lack of a bank reconciliation process creates an opportunity to misappropriate cash from the bank deposit and not detect the discrepancy.

Funds deposited should be recorded in the PeopleSoft Financial System and reconciled to City bank statements at least on a monthly basis.

Point of sale system transactions should be automatically downloaded into the PeopleSoft Financial System. Manual journal entries are required to record cash register and transaction log activity into the PeopleSoft Financial System. Each department should forward pertinent documentation to Finance and Administration in order to prepare manual journal entries.

Finance Services/Finance and Administration should perform, document, review and sign off on bank reconciliations by the end of the month following the month being reconciled. Any discrepancies between funds deposited and bank activity should be investigated and resolved with assistance from the operating department.

Safeguarding Cash

Inadequate physical security provides an opportunity to misappropriate cash from the float, daily cash receipts and/or bank deposit. It may be difficult to identify when and why cash shortages occur or the person responsible if access to cash is not limited.

Background checks should be performed on prospective cash handlers. Employees handling cash receipts should be bonded.

Cash should be kept secure at all times. This includes but is not limited to:

- Keeping all cash in a locked cash register, cash drawer or cash box;
- Locking the cash register, cash drawer or cash box when cash is left unattended; and
- Affixing cash registers and boxes to a fixed surface to prevent removal.

Physical access to the safe or storage areas where cash is kept should be restricted to a limited number of people. Access may be restricted by limiting those with access to keys or knowledge of the combinations. Access should be granted based on the employee's job duties.

Safe combinations should be kept in secure locations and records should be maintained listing those who have knowledge of the combinations. Safe combinations should be changed periodically or when there is a change in staff (e.g. termination, change in position, retirement, etc.).

For safes, lock boxes, filing cabinets or cash drawers with keys, all keys and copies must be kept secure and there should be a log to track the issuance of keys. When an employee leaves the employment of the City or changes responsibilities, all keys should be turned in. Operating departments should have a plan in place for re-keying safes / lockboxes periodically.

If security proximity cards are used to restrict access, the access listing should be obtained from Facilities yearly and reviewed by management to ensure only required personnel have access.

Security devices (e.g. cameras, alarm buttons, bullet proof glass) should be installed at locations where a considerable amount of cash is collected.

Cash should be counted in a non-public, secure area, out of sight.

Cash Float

Continuous access to the cash float for an extended period of time without management oversight provides an opportunity to misappropriate, skim or lap funds.

A cash float is issued for the purpose of making change for a cash transaction. Money from the float should not be retained or expended to pay invoices or miscellaneous expenses, replenish petty cash or make loans or advances.

The cash float should be stored in a secure location with limited access at all times. Access to the cash float should be limited to the cashier and their direct supervisor during a given shift.

The cashier should count the cash float at the start and end of their shift. At a minimum, the float should be re-counted by management or their designate at the end of the cashier's shift as part of the receipts reconciliation process. Shortfalls in the float balance should be brought to management's attention, investigated, documented and resolved.

Management should conduct a surprise count on a periodic basis to reconcile the float balance. The count should be witnessed by another employee and the reconciliation documented and initialed by both employees. At a minimum, surprise counts should occur on a quarterly basis.

RESPONSIBILITIES

The General Managers, in conjunction with departmental management, shall be responsible for:

- Ensuring that the above guidelines and internal controls are incorporated into cash handling procedures developed for and implemented in their respective service areas;
- Ensuring that cash handling procedures and related internal controls are in place and operating;
- Establishing additional procedures and controls required to meet specific departmental needs; and
- Ensuring that personnel, who handle cash, are informed of, understand and adhere to the provisions of departmental cash handling procedures.

Employees handling cash receipts are responsible for complying with cash receipt handling procedures developed for and implemented in their respective service areas.

The Director of Audit Services or designate is responsible for completing cash handling reviews of select departmental or service areas on a periodic basis to identify opportunities for improving and strengthening cash handling controls.