Kawenni:io / Gaweni:yo Private School



Finance Policies Procedures & Regulations

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Financial Forms can be found on the Shared Common - S:\Financial

Kawenni:io/Gaweni:yo Private School Finance Policy

Policy Framework

The duty and responsibility of the Kawenni:io/Gaweni:yo Private School leadership is to protect three clearly defined areas. These areas are essential to the operation of the Private School and delivery of a quality education for Kawenni:io/Gaweni:yo students, families, staff, and decision-makers. Key to this success is excellence in the care, operation and administration of the Private School's resources. The achievement of these Criteria for Excellence results in the delivery of the Kawenni:io/Gaweni:yo Private School Vision. The Private School views as good the duty and responsibility:

- 1. To protect the Vision of Kawenni:io/Gaweni:yo Private School as an educational organization that seeks to provide a quality education for the Children of Six Nations enrolled in our culturally enriched programs.
- 2. To protect the financial and physical Resources received by Kawenni:io/Gaweni:yo Private School to enact our programmes to achieve the Vision of a quality education for our learning community.
- 3. To protect the students, families, staff, and leadership who are members of the Kawenni:io/Gaweni:yo Private School learning community who are stakeholders in the delivery of a quality culturally enriched education for our People.



At the heart of the covenant with the People of the Six Nations is the commitment to protect the Vision, People, and Resources of the Kawenni:io/Gaweni:yo Private School.

1.0 Purpose

Kawenni:io/Gaweni:yo Private School (KGPS) is accountable to a variety of internal and external sources, therefore reliable management and control systems must be implemented and KGPS is committed to ensure the timeliness and accuracy of financial reporting in accordance with generally accepted accounting principles.

KGPS has established its fiscal year as a twelve-month period from April 1 to March 31. The financial management policy contained throughout this document offers guidance to KGPS's management and staff to ensure consistent and standard financial practices are implemented throughout the entire organization.

1.1 Scope

The financial management policy defined within this document addresses daily or regular financial responsibility. This policy is meant to be a guideline and where interpretation of policy is unclear or in the absence of policy for a unique situation, users are advised to seek the advice of the Principal for clarification.

2.0 RESPONSIBILITY

2.1 Principal Responsibility

The Principal is responsible to ensure that actual financial conditions at any time shall not incur fiscal jeopardy or compromise the Board Ends priorities. (KGPS 23 Policy Statement on Protecting the Vision: Accountability of the Principal)

In doing so, the principal will ensure the implementation of this policy so that:

- a) Financial management policies and procedures are in place to provide accountability to the internal and external sources such as the Audit Committee, Board of Directors and funding resources that financial matters are being administered in a manner, which ensures value for money and the continued soundness of KGPS operations.
- b) The assets of KGPS are safeguarded.
- c) A complete set of accounting records of all financial transactions is provided in a form suitable for decision making and audit purposes.
- d) Funds of KGPS are administered to enable KGPS to meet its financial responsibilities/obligations set out in contribution agreements and to foster a reliable reputation in the business world and community.

2.2 Management Responsibility

The principal and managers are expected to be familiar with the financial management policy as it pertains to daily activities. Failure to adhere to the financial management policy could result in mismanagement and/or misappropriation of funds to which KGPS could be denied funds in the future. The Finance Officer and Managers are to ensure all entries surrounding a pre-approved budget are accurate. This obligation is to ensure revenues charged against expenditures have been properly recorded and received. The Finance Officer is responsible to ensure timely and accurate financial statements are provided to all relevant management staff, Principal, Audit Committee and/or Board of Directors. The Finance Office staff must strive to achieve effective communication skills to ensure monies expended and received are fully documented.

3.0 OVER-RIDING POLICY

KGPS managers and staff are expected to consult all relevant policy and apply best judgment when exercising employment duties. From time to time, a unique situation may arise and existing policies may conflict. All staff has the responsibility to bring any conflicts within the existing policies to the attention of the Principal for resolution.

Existing policy includes and addresses:

- a) Board Policy governance, executive limitations, Principal accountability
- b) Staff Personnel Policy hiring, working conditions, hours of work, overtime, holidays, salary & benefits, leaves, performance appraisal, grievance, code of ethics, travel, media relations, security and relevant forms
- c) Student Policy- improving student achievement is of paramount importance to Kawenni:io/Gawenni:yo Private School.

Further, the KGPS's funding sources may be governed in part by a number of external laws and authorities. At no time shall the contents of this financial management policy override any known effective or governing regulations, processes or procedures written in the contribution agreements with the funding agencies. To maintain best management practices, the Principal and Board shall monitor and perform regular annual reviews and modifications of the financial management policy accordingly.

4.0 AUTHORITY OF FINANCE OFFICE

The Finance Office has authority to:

- a) Pay expenditures within identified budgets that are authorized by the Principal. Authorization is evidenced by a signature.
- b) Record monies received and make bank deposits for the same; as directed by a Principal or manager on the purpose of monies received.
- c) Commence payroll procedures for new employees upon receipt of all necessary completed forms. Under no circumstances will an employee be entitled to payroll until all required forms are complete.
- d) Implement wage garnishees if documentation is received [may be subject to review by legal counsel]. The Finance Office is required to notify an employee of such deductions and the scheduled start date in writing. The Finance Office does not have the authority to release any personal information relating to payroll without written consent of the employee, with the exception of the Canada Revenue Agency. This procedure applies to credit checks, credit references and general employment information. Further, written consent must include the name[s] of the institution[s] that may acquire information over a specific time. All subsequent requests for information will require additional employee consent. The Finance Office is required to obtain original paperwork for audit purposes. Should documentation appear to be a photocopy or facsimile copy, the Finance Office has the authority to refuse processing of a transaction until original paperwork is forwarded. Alternately, written authorization from the Principal may be obtained to process the transaction.

5.0 GENERAL PRACTICES

5.1 Asset Protection - Furnishing, Equipment, Tools and Other

The Finance Office shall record all new School assets meeting the criteria below, in the School asset log.

Criteria for Recording Assets

- a) has a life expectancy of more than one year
- b) has a purchase price of two hundred fifty dollars (\$250) or more
- c) recorded at cost

A sequential asset numbering system will be utilized to assign and reference all assets.

5.1.1 Depreciation of Assets

Depreciation on property and equipment is provided using the declining balance method as follows. Building improvements are recorded on a straight-line basis over a period of 10 years. The half year rule is used in the year of acquisition.

a) Vehicle 30%

c) Computers 30%

b) Equipment 30%

d) Building 4%

Improvements straight line To purchase goods/services for the company, please refer to Inventory Control procedures in section 9.0 of the financial management policy.

5.2 Cheque Signing Authority

To complement existing board policy, KGPS must have three (3) designated signing officers (Principal, Board Chair, Vice Chair, and Secretary-Treasurer) of which any two must endorse cheques for payments. Additions, deletions or changes to current cheque signing officers may be negotiated directly with financial institutions by way of written documentation on KGPS letterhead. Requests for changes to signing authorities shall be not be valid unless at least two cheque-signing authorities endorse the written request. All changes shall be reported by way of the Principal to the Board of Directors.

A cheque-signing officer shall not sign a KGPS cheque if any of the following conditions exists:

- a) the cheque is not pre-numbered
- b) an approved invoice and/or supporting data does not accompany the cheque (approved invoice to be signed off by Principal or designate)
- c) if cheque is payable to his/herself
- d) if cheque is blank

All signing officers have the right to refuse to sign a cheque if it is not supported by proper documentation. This refusal signifies an alert and no other signing officer may be sought out in lieu off a signature. The Finance Office must resolve the issue with the signer within two working days.

5.3 Petty Cash

Petty cash (cash on hand) is required to permit the purchase of immediate, low-value items. The Finance Officer will authorize and approve such purposes. The petty cash can be increased if required by requesting the increase from the Principal and informing the Audit Committee. The Petty Cash is to be kept in the safe for protection at all times.

5.3.1 Receipts for Purchases

Expenses/reimbursements paid from a petty cash fund can only be made for the purpose(s) for which the fund was authorized and must be supported by receipts, which should contain the following information:

- a) Date of purchase or payment
- b) Name of vendor or other payee
- c) Amount paid and
- d) Description of the goods purchased

5.3.2 Obligation to Balance the Fund

The Finance Office is obligated to replenish the petty cash as required. A receipt must be issued for all monies removed from the petty cash fund. Total receipts plus cash on hand must equal the total petty cash fund at all times.

5.4 Budget Preparation

Assigning a monetary figure to a task, project or program represents an accepted School plan to accomplish a set of goals with specified revenues and expenditures. The process of assigning monetary figures to a task is commonly referred to as budgeting.

The establishment of a fiscal forecast requires the collective effort of the Finance Officer, Program Manager and Principal prior to submission deadlines in the preceding fiscal year. The forecasting process may be based on a number of operational assumptions; therefore the Finance Officer will be responsible to collect any documentation necessary for review, such as historical numbers if project has been delivered in prior fiscals or throughout fiscal year.

The finance Office will record all approved budgets and provide comparative monthly financial statements showing actual allotments and budgets to all respective managers. Failure to complete timely, detailed annual budgets could result in an overall company deficit or misappropriation of funds. As per the Board Policy, the Board of Directors must be informed of the fiscal budget by April 30.

5.5 Insurance

The School is obligated to provide adequate insurance protection for the building and contents, employees, board members, officers and assets. Insurance protection includes but is not limited to:

- Commercial property liability
- Directors and Officers Liability
- Environmental Liability
- Automobile Liability
- Legal Expense Liability
- Out of province and out of country travel protection
- Worker's Compensation

5.6 Travel Advances/Expense Claims

KGPS adopts the rates provided by the Treasury Board of Canada.

An employee, or designated representative of KGPS, may seek an advance for expenses when requesting to travel on School business. Travel advances are issued by way of authority to travel forms and must be approved by the principal then sent to the Finance Office for processing. Upon return from travel all travel advances need to be reconciled with an Expense Claim

- Travel Advances for ground transportation are calculated using MAPQUEST or similar resources for distance calculations. Approved advance payments, payable by cheque/direct deposit, are limited to: meals, accommodations, incidental fees, registration fees and transportation costs. The employee, in receipt of a travel advance, agrees to provide original receipts and reconciled travel advance to the Finance Office for all related expenses within five (5) business days of travel return. (Note: receipts for meal allowances are not required.)
- Travel Expense Claim forms must be filled out in order for employees to be reimbursed for expenses incurred such as hotel rooms and air fare. The receipts must accompany the claim. Also, an employee may include to be paid for meals and incidentals with proof of agenda or meeting to indicate which meals and incidentals would be payable for travel period. Mileage can also be claimed with MAPQUEST or similar resource as proof of kilometers travelled.
- If destination is a usual travelled area on Six Nations for the purpose of regular business no travel allowances will be allowed Travel allowances are allowed for any approved travel outside of the Six Nations area
- All travel for destinations outside of normal business travel, refer to travel rates for set kilometers and no documentation is required. E.g. McMaster University Hamilton, Staples Brantford etc.).

5.7 Investments

Investments of School cash by way of term deposits and guaranteed investment certificates (GIC's) are an accepted business practice. Investments other than term deposits and GIC's must be pre-approved by the Board of Directors. All investments must be clearly disclosed and reported on the School balance sheet.

It is the responsibility of the Finance Officer in consultation with the Principal to ensure investments will not interrupt the cash flow necessary for daily operations. Investing is always a risk; therefore it depends on the risk that KGPS is willing to take.

Some investment options are:

- Cash (Savings Accounts)
- Term Deposits (cashable and one year in length)
- Guaranteed Investment Certificates (GIC's) (cashable or locked in depending on timeframe)
- Mutual Funds
- Bonds, Stocks
- Exchange Trade Funds (ETFs)

5.8 Financial Statements

Reporting of financial information is essential for decision making and is required to be accurate and recorded in a timely manner. All internal reports must be printed each month and filed within the Finance Office. The internal reports are to include:

- Balance Sheet
- Consolidated Statement of Earnings
- Statement of Earnings for each program/department
- Trial Balance
- A/R Aged Trial Balance Report
- A/P Aged Payables Report

The Statements of Financial Position must be prepared on a monthly basis by the 15th of the preceding month.

5.8.1 Audit Committee (Full Board)

The Audit Committee meets once a month on the third Tuesday of each month, or as otherwise scheduled. The Finance Officer is responsible for preparing the Statements of Financial Positon and delivering to the Audit Committee in a timely manner before the monthly meetings. The following internal reports are presented to the Audit Committee:

- Balance Sheet
- Consolidated Statement of Earnings
- A/R Aged Trial Balance Report
- A/P Aged Payables Report
- Bank Reconciliations

5.8.2 Board of Directors

The Board of Directors is reported to on a quarterly basis. The following internal reports are presented to the Board of Directors:

- Balance Sheet
- Consolidated Statement of Earnings

Additional reporting of financial position and/or disclosure shall comply with stipulations set out by funding sources and subsequently agreed to in advance, by KGPS.

5.9 Financial Control Accounts

The Finance Manager is responsible for creating/setting up the chart of accounts which include control accounts for the accounts receivable, accounts payable and retained earnings. It's the responsibility of the Finance Officer to ensure these control accounts reconcile each month.

5.10 Banking Operations

Bank Accounts

Bank accounts are to be set up at a chartered bank in Ontario. All requests to open new bank accounts or for changes to existing bank accounts must be in writing and endorsed by two signing authorities or negotiated with the chartered bank. All employees and representatives of KGPS who could be in the capacity of cashier (collection of revenue, handling of cash) are required to obtain and pass a standard police check, at the KGPS's expense. Employees who act in the capacity of cashier shall have regular police checks as follows:

- Upon commencement of employment
- Every five years

Reconciliation of Funds – Bank Reconciliation

The Finance Office within five working days of month end, with the exception of Christmas closure, is responsible for reconciling all bank accounts. Any irregular discrepancies to bank deposits must be disclosed to the Principal and resolved immediately.

5.11 Financial Audit

KGPS is accountable and transparent, therefore will seek validation of the company's financial position as reported by the Finance Office. The Board of Directors is responsible for selection of the firm or individual to conduct the annual financial audit. Every three years, KGPS shall exercise the right to an open call for proposal for the purpose of financial audit.

The auditor is appointed by KGPS by means of an annual engagement letter signed by the Principal. The financial statements shall report all financial activities. The audit shall be in accordance with Canadian Auditing Standards and be prepared on the accrual basis and in accordance with generally accepted accounting principles. The audit will consist of:

- Auditor's Report
- Statement of Financial Position (Balance Sheet)
- Income Statement (Statement of Revenues, Expenses and Surplus/Loss)
- Statement of Cash Flow
- Notes to Financial Statements
- Plus any other schedules required to satisfy contribution agreements
- The auditor shall have the right of access during regular working hours to the accounting records, supporting documentation, including minutes of KGPS Board Meetings and Audit Meetings.

As per the Board Policy the audit is to be conducted in a period not exceeding 120 days from the end of the fiscal year.

5.12 Electronic Data Backups

All accounting functions, processes and transactions shall be stored on the KGPS computer file server for automatic daily backups which will be monitored by authorized computer personnel. The daily backups are done incrementally (only the changed data) everyday including weekends all year round. A full backup will be done yearly.

5.13 Record Keeping for Computer and Photocopier

The Principal is responsible for all record keeping of usernames, passwords and codes for all computers and photocopiers. The financial management policy is detailed to prevent against misinterpretation that could lead to misuse or mismanagement of KGPS's assets and resources. While there are many internal controls within each section of the financial management policy, the following matters are provided as a "quick reference" to minimize internal controls required by KGPS.

6.0 INTERNAL CONTROLS (Segregated Duties)

6.1 Receipts

- All methods of payment received by KGPS shall be issued an official pre-numbered receipt. (Cash, debit card, credit card, money order or cheque). This includes payments by mail.
- The receipt must identify the payee, the date, the method of payment, the reason for payment, and be signed by the staff accepting the payment.
- All cash payments must be signed off by two staff members, no exceptions.
- Personal or post- dated cheques will not be accepted.
- A summary of the daily cash receipts will accompany the daily submission of payment by the receptionist and handed into the Finance Office, no exceptions.

Refer to Payment Receipt Procedure for detailed procedures

6.2 Bank Deposits

The Finance Officer is responsible for:

- Ensuring the receptionist and others hand in all funds received on a daily.
- Ensuring all funds are reconciled to a pre-numbered receipt daily by keeping a log of the pre-numbered receipts.
- Ensuring all deposits are recorded within the bank deposit book and that US currency funds are filled out separately from the Canadian currency payments.
- Ensuring deposits are made daily by delivering the deposit in person to the bank.

Refer to Bank Deposit Procedure for detailed procedures

6.3 Payments

KGPS strives to keep up with technology and has converted most payments/disbursements to electronic funds transfers or online banking. For vendors who still have not updated to the electronic systems, KGPS will continue to issue cheques.

6.3.1. Payments by Cheque

All invoices are to be reviewed, coded and approved by means of a signature and date from the Principal before being inputted into the accounting system. After input, the invoice batch is reviewed and approved by the Principal before the batch is posted and processed further by the Finance Officer. The Finance Officer will print all cheques on pre-numbered KGPS cheques and obtain two authorized signatures.

- Appropriate documentation (supporting invoices) must be attached for all disbursements.
- Original bills, not copies, must be used for documentation.
- Adequate security must be provided over unused cheques.
- Under no circumstances should a blank cheque be signed.
- All functions (i.e. deposit, write cheques, issue cheques, reconciling bank account) regarding a chequing account should NOT be performed by the same individual or must be authorized/verified by the Principal
- Numerically controlled, pre-numbered cheques must be used.

6.3.2. Payments by Electronic Funds Transfer (Direct Deposit Payments)

- Same policy as 6.3A disbursements by cheque, to the point of uploading to electronic banking system. Two signatures/initials must be obtained from signing authorities after being processed to inform officers of the transactions. The Finance Officer is responsible for uploading the submission.
- A log must be kept for pre-numbered uploads of files/batches.
- Print report confirming submission was successful.
- Print report confirming release of submission was successful.

6.3.3. Payments by Online Banking (Vendor Payments)

All invoices are reviewed, coded and approved by the Finance Officer. The Finance Officer processes all payments through the online banking systems that can be setup through online banking such as utility bills, worker's compensation, and Canada Revenue Agency.

- Appropriate documentation must be attached for all disbursements.
- Two signatures/initials must be obtained from signing authorities after being processed to inform officers of the transactions.

6.3.4. Payments by Pre-Authorized Authority

The payments under this category have been set up by means of a contract and signed off by the Principal. This category would include Pension Company, Health Benefits Company, Insurance Company, Loans and MasterCard.

- Contracts are set for Insurance School and Loans (these amounts would be the same for each month).
- Amounts change monthly for MasterCard, Pension and Health Benefits. Ensure proper documentation is received each month to verify payment processed.

7.0 RECORDS MANAGEMENT

KGPS complies with "Records Guidelines for Common Administrative Records of the Government of Canada" as published by the National Archives of Canada (June 2000), with respect to records retention and destruction. Essentially, all financial related documents and records are retained for no less than a period of seven years.

All staff is responsible for labeling, packaging, and electronically listing when moving records to storage on an annual basis. Financial documents are the specific responsibility of the Finance Office.

Financial records for the current fiscal year are to remain in the 'active' file cabinets of the Finance Office. All earlier financial records are to be forwarded to the storage area.

From time to time, projects may span more than two fiscal years. In such instances, all recently 'closed' projects shall remain in the company's active file cabinets for a period of one year following the year-end audit.

KGPS approves the use of major credit cards and has established pre-approved credit with regular suppliers as standard business practice.

8.0 CREDIT and CREDIT CARDS

KGPS credit cards may be issued to staff for the explicit purpose of conducting company business. UNDER NO CIRCUMSTANCES CAN A STAFF MEMBER CHARGE PERSONAL BUSINESS ON THE SCHOOL CREDIT CARD.

All charges to KGPS credit cards must be pre-authorized by way of signature and/or electronic email from the Principal. Receipts for all charges must be retained by the credit card holder and forwarded to the Finance Office.

Charges to a KGPS credit card deemed to be of a personal nature are prohibited and the staff responsible will be subject to disciplinary action. *Refer to Disciplinary Action within the Personnel Policy*.

Purchases where the credit card holder is not personally signing for purchases (example: purchasing via fax or Internet) must adhere to the following policy:

• Proof of purchase must be verified by the staff and forwarded to the Principal for pre-approval.

8.1 CREDIT and CREDIT CARD

Pre-approved School Credit

When beneficial to School efficiency, pre-approved School credit may be established with suppliers. Completion of credit applications is the responsibility of the Finance Officer and must be endorsed by two signing authorities. The School will maintain a list of authorized School officials that may order/purchase using preapproved School credit and shall furnish this list to the respective School extending credit. The finance Office is responsible for keeping all such lists current.

All orders placed "on account", must be pre-approved. Individuals placing unauthorized orders are subject to disciplinary action.

9.0 INVENTORY CONTROL

Cost effectiveness, sound management practices and protection of company investments are essential factors of quality control. Companies who set out policy regarding purchases can realize significant savings and improve overall efficiency.

9.1 Ordering

The following applies to all orders for supplies or goods that will be shipped or delivered to the KGPS: An authorized purchase order requisition form (see Appendix A - Forms) must be obtained from the Finance Office before the order takes place. A log will be kept by the Finance Office of all purchase orders. All preapproved orders shall be forwarded to the Finance Department immediately after the order is placed. The Finance Office will match up purchase order with actual delivery slip and invoice upon receipt of each.

9.2 Receiving and Inspection of Goods

All deliveries made to KGPS shall bear a date and signature of the individual who received the order/goods. If the delivery is addressed to an individual, the package shall be forwarded accordingly. If no specific name is identified on the parcel, the delivery will be inspected to confirm all goods received against the delivery slip and inspected for breakage, shortages, and accuracy. All order discrepancies shall be brought to the attention of the Finance Office who shall be responsible for resolution and payment.

9.3 Product Returns

The staff who ordered the product is responsible for the return of supplies and/or goods received by KGPS either from damage or in error. Most vendors have strict return policies therefore all product returns shall be at the direction of the supply company. Notification of goods returned to suppliers and proper supporting documentation must be forwarded to the Finance Office within 3 days of returning said goods.

9.4 Stocking and Storage of Goods

All KGPS staff are responsible for the safe storage and stocking of supplies and goods. Cleaning supplies with possible health and safety risks are the responsibility of the Maintenance Custodian and must be stored in locked areas. As a general rule, exposure of supplies and goods to excessive light, heat, cold and dampness are to be avoided at all times. Proper storage reduces waste and improves overall cost effectiveness.

9.5 Usage, Protection, Obsolescence & Disposal of Goods and Materials

All employees of KGPS are accountable for efficient use of goods and materials furnished to conduct day-to-day tasks. All staff are responsible, to the best of their ability, for the protection of School assets and inventory against theft, fraud, vandalism and spoilage. Suspicious activity of any nature is to be brought to the attention of the Principal or appropriate manager.

Refer to section 15.0 for additional information.

Supplies, goods or materials that are deemed obsolete by way of age, expiration or other means are to be itemized accordingly and the Finance Office informed.

9.6 Disposal of Goods and Disposition of Assets

No property, goods, materials or assets of KGPS shall be disposed of without the explicit authority and written approval of the Principal or Finance Officer. Items that are to be disposed of shall follow all applicable environmental, occupational and health and safety acts surrounding disposition. Acceptable methods of disposal or disposition of goods can include, but are not limited to: Recycling, shredding, commercial waste or in-kind donation.

9.7 Complete Physical Count

At the end of the fiscal year and additionally, at the direction of the Principal or Finance Officer, all inventory and assets shall be physically counted and recorded by location. Completed Physical Inventory Count Forms must be completed, signed and dated by the counter and forwarded to the Finance Manager for analysis. Book Inventory is recorded at lower of cost or net realizable value and is performed by the Finance Office.

10.0 HARMONIZED SALES TAX (HST)

On July 1, 2010, the Harmonized Sales Tax was implemented in Ontario. The Harmonized Sales Tax (HST) is a consumption tax in Canada. It is used in provinces where both the federal Goods and Services Tax (GST) and the regional Provincial Sales Tax (PST) have been combined into a single sales tax. Purchases delivered to a First Nation reserve are tax (GST) exempt.

10.1 GST Rebates

All claims for reimbursement shall follow the guidelines set forth by Canada Revenue Agency. The Finance Officer is responsible for annual verification of the rebate process. The form used is called a GST 189 General Application for Rebate. Presently, GST reimbursements are subject to the following: Claims must be filed within two years of the payment date. Claims cannot be filed more than once per month. GST form 189 shall be completed, endorsed and mailed.

The Finance Officer will use discretion in determining the frequency of claim submissions based on time requirements and the rebate amount otherwise determined by the Canada Revenue Agency.

11.0 GENERAL LEDGER

11.1 Maintenance

A general ledger that records, reveals, and reports all financial activity shall be maintained for KGPS by the Finance Officer. The Finance Officer is responsible for establishing and maintaining all functions of the general ledger according to generally accepted accounting principles.

Housekeeping functions that routinely require maintenance and updates include:

- chart of accounts, departments and School codes
- source journals and financial statements
- bank and control account setup

School sub-legers including accounts receivable, accounts payable and payroll shall be posted, reviewed, and balanced to corresponding control accounts in the general ledger on a monthly basis. Discrepancies shall be resolved within ten business days of the previous calendar month end.

The Finance Officer is responsible for creating and maintaining a chart of accounts for all programs, projects and departments.

11.2 Audit

Upon completion of an audit there may be adjusting entries to be entered that are provided by the auditor. It is recommended that all adjusting entries be entered with notes of referencing AUDIT ADJUSTMENT and the FISCAL YEAR within the general ledger by the Finance Officer.

Refer to 5.11 Financial Audit for more information regarding the Audit

11.3 General Ledger Transactions (General Journal Entries)

The use of sub-ledgers captures most regular School accounting activities with the exception of the following:

- a. To correct an account or make a reallocation between programs
- b. To accrue a liability
- c. To record transactions between the KGLPP and KGPS
- d. To record depreciation
- e. To record a donation when a payee decides to donate their honorarium back to KGPS
- f. To record KGPS tuition sponsorships or bursaries All manual entries to the general ledger will be posted by the Finance Officer and must be filed with supporting documentation and signed off by the Principal.

Items *NOT* to be entered through general journal entries are:

- a. Payments made by pre-authorization such as payments to insurance, pension and health benefit companies and loans. These entries will be entered through the accounts payable sub-ledger within the account payable miscellaneous payment section.
- b. Fees from chartered banks and debit machines. These will be entered through the Bank Services subledger within the bank reconciliation section.
- c. Interest earned. This will be entered through the Bank Services sub-ledger within the bank reconciliation section.

11.4 Authority

The Finance Officer has the authority to establish general ledger accounts, control accounts, departments and financial statements for all projects and programs as necessary to accurately provide detailed accounting records of new accounting companies shall be at the direction of the Principal.

11.5 Reporting

Monthly reporting will be produced by the Finance Officer for all companies (e.g. KGPS, WIPCE), projects and programs and will include an income statement and general ledger listing detailing the transactions for the month specified. Additional reporting of financial position and/or disclosure shall comply with stipulations set out by funding sources and subsequently agreed to in advance, by the Principal. The finance Officer shall, provide financial statements and reports as necessary for internal reporting purposes.

Refer to 5.8 Financial Statements

11.6 Month End Requirements

General ledger month end tasks are the responsibility of the Finance Officer and include:

- a. posting and reconciliation of all sub-ledgers (accounts receivable, accounts
- b. payable reconcile to general ledger control accounts)
- c. completing and posting all bank reconciliations
- d. entering all entries required through the accounts payable miscellaneous section

- e. printing all financial statements balance sheet, consolidated income statements, all income statements by segment codes, trial balance. Ensure all financial statements reconcile (e.g. Profit/loss for the period on the consolidated income statement carries forward correctly to the balance sheet profit/loss for the period under the equity section.)
- f. 'closing' the period upon completion of all postings

11.7 Year End Requirements

11.7.1 Asset Depreciation

Measuring the loss in value of an asset is known as amortization/depreciation and is considered an expense to the company. All School assets (refer to section 5.1B) must be depreciated minimally on a yearly basis, including buildings and recorded to a depreciation expense account.

Refer to section 5.1B Depreciation of Assets

11.7.2 Reporting

Specific reports printed prior to the close of the financial year shall include but are not limited to:

- a. detailed general ledger listing
- b. trial balance
- c. balance sheet
- d. consolidated income statement

11.7.3 New Year

Until completion of a full financial audit has been conducted and corresponding audit entries have been posted; it may be necessary to simultaneously have two fiscal years 'active'. For purposes of clarity, the two fiscal years shall be referenced as old-year (activity recorded up to and including March 31) and new-year (activity recorded on and after April 1).

Old year activities shall be restricted to general ledger and adjusting audit entry transactions only.

New Year sub-ledger activities shall be restricted to revenue received and disbursements made on or after April 1.

11.7.4 Verify Balances

Posting of auditor's adjusting entries is generally viewed as the final step of closing out of the old-year. It is recommended to, at the very least, print a final trial balance and balance sheet to ensure all final balances are in sync with the audited financial statements.

The Finance Manager is responsible to ensure the accuracy and timely reconciliation of all balance sheet accounts. Failure to reconcile all balance sheet accounts could result in misappropriation of funds, false financial statements and poor management decisions based on misinformation.

12.0 ACCOUNTS RECEIVABLE

Accounts receivable is merely the process of recording all monies owed to the school or expected to be received by the school. It is recommended that KGPS use an accounting system that has an accounts receivable sub-ledger which will properly record all revenues or dollars earned and money yet to be received during the course of the fiscal year.

12.1 Money to be received by the school

All managers have an obligation to inform the Finance Officer of all monies expected to be received by the school. The Finance Officer has an obligation to record all such monies received (revenue) in the period in which they are considered to be earned.

Actual amounts of program or regular annual funding or the time at which money will be received are not always known and/or can change from original allocations. It is imperative however that all managers communicate to the Finance Officer the expected revenues by the source and the specific purpose/intent of the revenue in order to accurately process all money received.

A contract should be in place with all major revenue sources to ensure the Finance Office is aware of all monies owed to the school.

12.2 Revenue Generating Events or Activities

All events or activities have potential to generate revenue for the School and must be assigned a unique event code by the Finance Officer prior to advertising or hosting the event. All monies received in support of an event will reference the event code to accurately report all revenues earned, such as all fund raising events. All documentation or advertising regarding an event must clearly state so in order for the revenue and expenditures to be properly coded towards.

12.3 Methods of Payment

Acceptable methods of payment for monies owed to KGPS are: cheques issued by organizations, certified cheques, debit, money orders, direct deposits (electronic fund transfers) or cash.

12. 5 Invoicing

The finance Office is responsible for generating, printing and issuing invoices to customers for all accounts receivable. Some exceptions may apply for situations like cash sales from customers who show up on the day of an event. All managers expecting to receive funds for a program, department, or division must advise the Finance Office in writing, on a timely basis, by way of original contract or supporting documentation.

If specifically requested, the Finance Office will advise managers when funding has arrived. If notification is not required, revenues will be posted upon receipt and reflected on financial statements.

12.5.1 Invoicing Schedule

Invoicing is processed on every Tuesday providing the proper documentation is submitted.

12.6 Pre-Payments or Cash Sales

From time to time, a customer may wish to pay for a service without having yet been invoiced. A typical example might include, an individual shows up and pays registration fees on the day of an activity without pre-registering. Fees received from customers who do not have an invoice are referred to as prepayments or cash sales. A duplicate pre-numbered receipt must be issued to the individual/School providing the pre-payment or cash sale. Further, all cash sales must be verified by a second individual confirming each cash sale received prior to forwarding to Finance Office.

Refer to Payment Receipts Procedure for more details.

12.7 Processing Payments Received

The Finance Officer is responsible for entering and posting all payments received into the computerized accounting system within five (5) business days of receipt by the finance Office. All cheques must be stamped "for deposit only" immediately upon receipt and further, all methods of payments will be deposited into the appropriate bank account daily.

12.8 Over Payments

From time to time, payments may be received for more than the original invoice amount. The following applies to customer over payments made to KGPS: Any 'unapplied' payments from regular customers shall not be returned but rather will be charged to future purchases. For occasional customers the difference will be returned by cheque. Overpayments of not more than \$1.00 shall be posted to an overpayment revenue account; customer notification is not required. Overpayments more than \$1.00 from 'one-time' customers shall be returned to the customer by cheque. In the event a customer cannot be notified to return the overpayment, the overpayment shall be posted to an overpayment revenue account.

12.9 Outstanding or Unpaid Invoices [Collections]

Invoices that are not "paid in full" are considered outstanding and shall be flagged accordingly. Invoices that have not been paid within 45 days from the date of the invoice require a follow up reminder via telephone from the Finance Officer. Customers shall be advised that invoices more than 60 days old are subject to late charges of 1.5% on the outstanding balance. Customers are encouraged to make partial payments until the balance is paid in full.

The Finance Office is responsible for following up with customers for invoices that are more than 60 days outstanding. An aged accounts receivable report is to be printed monthly and aggressively followed upon. The appropriate managers will be notified of outstanding collections.

12.9.1 Delinquent or Unresponsive Customer Accounts

Customer accounts more than 90 days outstanding are considered delinquent. Collection attempts via telephone that have failed to generate revenue on accounts older than 60 days must be followed up in writing by way of a customer statement, and distributed to the customer. This process will be repeated at six months, nine months and one year. If management is following policy diligently this process should not be required.

Where customers do not respond to requests for payment over the one year collection period, the account will be deemed 'uncollectible' and considered to be a write-off or transferred to the allowance for doubtful account.

12.10 Write-Offs

Write-offs or bad debts will be recognized as accounts that are deemed uncollectible. Customers with unpaid invoices more than one year may at the discretion of the Principal be written-off and the Board informed. Customer balances written-off shall be charged and reported accordingly to the bad debt account. The Finance Office is responsible for providing all appropriate staff with a current list of customers ineligible for credit.

12.11 Allowances for Doubtful Account

After one year, on occasion, there may be hope in collecting from a customer. If this is the case, this outstanding invoice will be transferred to the allowance for doubtful account.

12.12 Other Items for Consideration

12.12.1. Death of a Debtor

Uncollectable revenue, in the event of customer death, at the discretion of the Principal, may be written-off or pursued for collection. For collections, a claim against the estate of a Six Nations band member must be prepared at the advice of legal counsel. Indigenous and Northern Affairs Canada (Estates) must verify the death before any action is taken. Further, claims against the estate of a Six Nations member must be filed within four months after first publication of notice to creditors.

12.13 Monthly Requirements

Accounts receivable functions are reported at the end of each month. The Finance Department, within 10 business days of the previous calendar month, shall complete all monthly requirements listed below:

- print, analyze and file a detailed aged accounts receivable report
- reconcile accounts receivable control accounts
- follow up with customers on outstanding balances more than 60 days old
- process late charges
- print and distribute applicable customer statements

12.14 Fiscal Year End

12.14.1 Close of Year

At the conclusion of the fiscal year, the Finance Officer will determine the most appropriate time to 'close the year'; it shall not be more than 30 days after the actual fiscal year end. The Finance Officer will also determine what is classified as old year and New Year.

Accounting procedures dictated by current accounting software shall be completed to ensure all receipts and outstanding receivables are reported in the correct fiscal year.

An aged accounts receivable report shall be printed for the period ending March 31 (old year) after year end close procedures have been completed.

12.14.2 Accrued Revenue

Revenues earned by the School but not received in cash or recorded as owing at the end of the fiscal year must be accrued by the Finance Office. Accrued revenues typically include but are not limited to: unbilled fee for service and deferred registration fees.

Failure to report accrued revenue could have significant impact on financial statements while simultaneously providing misleading statements of the company's financial position.

12.14.3 Deferred Revenue

On occasion, a contract may enter partially into the next fiscal and monies received may not have all been spent. This will cause a surplus. Most cases a surplus must be returned or transferred to a deferred revenue account to be spent in the following fiscal.

13.0 ACCOUNTS PAYABLE

13.0 ACCOUNTS PAYABLE

Accounts payable is a systematic approach to ensuring School expenses are properly allocated and paid on a timely basis, taking advantage of discounts that may be offered. Accounts payable systems are designed to categorize all expenses that have been incurred by the company. All authorized School expenses are payable upon receipt of an original invoice, subject to the terms of the invoice/contract.

13.1 AUTHORITY LIMITS CHART

School expenses will adhere to the following limits, allowances and process as indicated in the following chart.

Board of Directors

- Up to \$10,000 in fiscal years for training, including attendance at conferences and workshops.
- Up to \$5,000 in fiscal years for surveys, focus groups, opinion analyses, and meeting costs

Principal

Up to \$10,000

Purchases over \$10,000 are subject to cost effective means by obtaining three (3) quotes, as per Board Policy

Employees not complying with section 13.1 are subject to disciplinary action.

13.2 Contractual Obligations

Services required beyond the scope of full time staff are deemed necessary from time to time. KGPS may be required to enter into contractual agreements for major purchases or services. Such services may be performed by consultants, contractors or other professionals and may be subject to tendering.

Under no circumstances shall any disbursements for contracts be issued until the contract has been properly endorsed and authorized.

Contracts are not deemed necessary for:

- Office supplies, equipment, operating and administration costs.
- Employee travel, training or education opportunities

13.3 Payment Processing (Disbursements)

KGPS strives to keep up with technology and has converted most payments/disbursements to electronic funds transfers or online banking. For vendors who still have not updated to the electronic systems, KGPS will continue to issue cheques.

13.3.1 Payment Schedule

Invoices or cheque requisitions accompanied by applicable supporting documentation are paid once per week.

- a. For payments by cheque, the submission is required by Wednesday by noon and will be ready for mailing or pick up the Friday of the same week.
- b. For payments by direct deposit, the submission is required by Tuesday morning 9 am to be deposited on the Thursday of the same week.
- c. For online payments, the payment is at the discretion of the Finance Officer upon receiving the supporting documentation required.
- d. Pre-authorized payments are specified within the contractual agreements.

In order to be cost efficient, all payment schedules must be adhered to.

13.3.2 Invoice Terms and Discounts

Some vendors may from time to time, offer discounts on invoices for prompt payment and are proposed in the invoice "terms" section. Further, the terms section also provides the payment due date if not specifically stated.

Invoices shall be payable on or immediately before the due date and all invoices specifying a discount shall be processed to take advantage of such discounts.

13.3.3 Receipts

Original receipts are required to accompany cheque requisitions, travel claims and credit card purchases that are submitted for reimbursement. Original receipts may be mailed, hand-delivered or electronically transmitted. Depending on the nature of the expense, it is realized that such receipts may be emailed and considered the original receipts such as hotel invoices/receipts. Failure to produce original receipts may result in non-payment. (Exception: receipts for meals during travel and/or training away from the office are not required as meal allowances are given.)

In the case of lost receipts, the staff member is to make every effort to obtain a certified copy or duplicate receipt. In the event duplicate receipts are not obtainable, the Finance Officer may with discretion, accept a signed declaration by the staff member stating they lost the receipt(s) and what School business and date the purchase took place.

13.4 Cancellation of Vendor Cheques

13.4.1 Lost Cheques

When KGPS receives notification a cheque is "lost", a replacement cheque may be issued to the payee after placing a stop payment with the bank. A nominal fee will be charged to issue a replacement cheque and will be deducted from the amount of the replacement cheque to cover the stop payment fee charged by the bank.

A stop payment order merely involves calling the corresponding bank with instructions to stop the process of a specific cheque. The bank must be provided with all relevant details for the action to take place. A stop payment order may also be processed through online banking.

13.4.2 Outstanding Cheques

Any School cheque that has not 'cleared' the bank and has not been cancelled is considered outstanding. Outstanding cheques are categorized as either:

- uncashed cheque was mailed or delivered to the payee but remains
- outstanding *OR*
- unclaimed cheque is held by the School for issuance or delivery to the payee; or cheque was issued and returned to the company. All cheques that are outstanding for 6 months from the date of issue will become stale dated and not cashable. The cheque will then be cancelled and re-issued through the accounting system. The word "VOID" either written in ink or stamped across the body of the cheque so it cannot be cashed at a later time.

13.4.3 Voiding School Cheques

Completed cheques whether signed or unsigned, may be voided at any time prior to issuance or delivery. Reasons for voiding a cheque include: incorrect payee, incorrect amount, incorrect date or a cheque sample is required for direct deposit transactions.

All voided cheques will have signatures removed, and the word "VOID" either written in ink or stamped across the body of the cheque so it cannot be cashed at a later time. A complete record of all voided cheques must be maintained.

13.5 Over Payment Collections

In the event an invoice or claim is over paid or inadvertently paid more than once, the Finance Office is required to:

• calculate the amount of the over payment and

• contact the payee regarding the over payment and arrange for re-payment The finance Office is responsible for following up with the payee, on delinquent repayment schedules. The delinquent or unresponsive customer accounts receivable policy will apply. Over payment collections are not subject to late charges.

13.6 Other Items for Consideration

13.6.1 Payments for Deceased Payees

In the event of a deceased payee, the School shall make any payments owing to the deceased, payable to the estate of the deceased upon receipt of legal notification and verification.

13.6.2 Payments to U.S. Vendors

If the School must make payment to a U.S. based vendor in U.S. currency, the exchange rate in effect on the date of the payment applies.

13.6.3 Maintenance of Records

Adequate physical security will be maintained for all accounts payable records to protect them against loss or manipulation. Regular computer data backups will be maintained by the authorized computer personnel to ensure the integrity of all payables.

Refer to 5.12 Electronic Data Backups

13.6.4 Pre-Numbered Cheques

All cheques used for payments by the School will be sequentially pre-numbered and secured in a locked cabinet. All processed cheques in the sequence shall be accounted for at all times, with a status of outstanding, cleared, void, or cancelled. Any cheque in the sequence considered missing shall alert action by the Finance Officer. Blank cheques are to be locked and accessible by authorized finance Office staff only.

13.6.5 Division of Responsibility

Where possible, there always should be a segregation of duties within the Finance Office.

Refer to section 6.0 Internal Controls

Program managers are responsible to ensure expenses charged to their accounts are valid and accurate. Further, all programs have an obligation to verify and confirm that goods and services were received, in acceptable condition, in the quantity ordered.

Refer to Inventory Control - section 9.0 for additional information

13.6.6 Non-cash Awards and Gifts

KGPS from time to time, may want to purchase gifts as an expression of sympathy or recognition to staff, community members and/or business partners. Authority to approve such awards or gifts will be at the discretion of the Principal. Payments for such awards and gifts shall generally be made by cheque however; allowances for such may be accommodated through petty cash if pre-authorized by the Finance Officer or Principal (e.g. monetary gift for funeral)

13.6.7 Implementation and Release of "Hold Backs"

KGPS reserves the right to "hold back" a maximum of 10% to a vendor or supplier for services rendered. The hold back amount will be clearly stipulated in a contract or similar document with terms mutually agreed upon by KGPS and vendor. Hold back payments will be prepared and released with authority and written approval of the Principal.

13.7 Month End Requirements

The finance Office within ten (10) business days of the previous calendar month shall complete the following monthly requirements:

- print an aged accounts payable listing
- reconcile accounts payable control accounts with the general ledger

13.8 Fiscal Year End

At the conclusion of the fiscal year, the Finance Officer will determine the most appropriate time to 'close the year', however shall not be more than 30 days after the actual fiscal year end. The Finance Officer will also determine what is classified as old year and New Year. It is common practice to have two fiscal periods open until the audit has been completed.

Accounting procedures dictated by current accounting software shall be completed to ensure all purchases and outstanding balances owing are reported in the correct fiscal year. An aged accounts payable report shall be printed for the period ending March 31 (old year) after year end close procedures have been completed.

Employees are entitled to regular compensation for efforts expended on behalf of the company. Both the School and the employee have an obligation to ensure all required documents and forms are properly endorsed, authorized and submitted on a timely basis. Related policy with respect to payroll can be found in the Personnel Policy.

14.0 PAYROLL

14.1 Employment Contract

Upon signature of both the employer and employee of an employment contract, an employee shall be entitled to receive payroll benefits as stipulated in the signed contract. All new employees shall be given a copy of the signed contract as evidence of the employer's obligation to provide regular compensation. All new employees are encouraged to check with the Finance Office on the 1st day of employment to ensure all paperwork has been completed and avoid unnecessary payroll delays.

14.2 Payroll Entitlement

KGPS agrees to pay employees the remuneration defined in an employment contract at the frequency specified, subject to the completion and provision of all required forms. Further, all mandatory benefits and deductions shall be applied to the remuneration calculating an employees' net or 'take home' pay. This is determined on the status of the employee whether non-status or status Indian. *Refer to 14.9 Mandatory Benefits and Deductions*.

Failure on the part of an employee to submit completed, mandatory payroll forms will result in delayed payment of earnings. KGPS agrees not to deduct any optional fees from an employee's salary without the written consent or approval of the employee. Any requests for information and/or deductions such as a wage garnishment from the Canada Revenue Agency will be complied by KGPS. In this case the employee will be advised in writing of the mandatory action taken by KGPS. KGPS does not hold back a week's pay and all partial pays will be paid out within the following weekly pay period.

14.3 Obligation of Employer and Employee

KGPS accepts responsibility for supplying all relevant policy and forms to employees regarding payroll. KGPS is not responsible however, for preparing timely payroll to employees who fail to provide the necessary forms, timesheets or who do not follow proper payroll procedures.

It is understood that an employee who fails to:

- follow procedure,
- obtain pre-authorization when necessary, or
- submit all necessary forms on a timely basis, can expect to have delayed payroll payments or unexpected employee payroll deductions.

14.4 Changes in Employment Status

KGPS may offer various short-term leave with pay including pre-approved leaves: annual, sick, marriage, bereavement, maternity and personal to eligible employees. Refer to Personnel Policy.

When an employee's absence is such that payroll is discontinued (temporarily or otherwise), the employee's immediate supervisor is responsible for advising the Finance Office immediately, preferably before an employee's last day in order for a Record of Employment (ROE) to be issued. Service Canada has set deadlines for ROE submissions depending on an employee's pay period cycle (weekly, bi-weekly, monthly). The Finance Office must also be advised by the employee's immediate supervisor of any monies owing to the employee such as vacation pay or other benefits as this information is required to be stated within the ROE.

14.5 Return to Work after Extended Leave

An employee that returns to work after an extended leave without pay is responsible for the timely completion and forwarding of an 'extended leave - return to work form'. The form must be signed by the returning employee's immediate supervisor and forwarded to the finance Office within 2 days of return to work. Failure to complete the form could result in delayed, future payroll entitlement. In the case of an employee returning from a sick leave, the return to work form must be accompanied by a doctor's note indicating the employee is able to return to work. *Refer to Personnel Policy*.

14.6 Interruption of Earnings and the Record of Employment [ROE]

An interruption in earnings occurs when an employee of the school:

- a. is laid off (shortage of work or end of contract)
- b. has had, or is anticipated to have, 7 consecutive calendar days without work and insurable earnings from the employer
- c. in the case of a sessional instructor, 30 consecutive days without work
- d. strike or lockout
- e. return to school
- f. illness or injury
- g. quits his/her job
- h. maternity leave
- i. retirement
- j. work sharing
- k. apprentice training
- 1. dismissal/terminated
- m. leave of absence
- n. parental leave
- o. compassionate care
- p. other to be explained in the comments section

KGPS employees (that work on a regular, frequent basis) experiencing an interruption in earnings are entitled to receive an ROE stipulating among other things, length of employment (start and end date) and wages earned. Generally, a record of employment must be issued within five (5) calendar days of the interruption of earnings or the date the employer becomes aware of the interruption. *Refer to Service Canada website for timeline depending on pay period cycle*.

KGPS is subject to penalties for non-compliance under the Employment Insurance Act, therefore the Finance Office timely preparation of the ROE.

14.7 Payroll Distribution

KGPS utilizes the method of direct deposit to compensate all employee wages. Paper cheques will be utilized only in the event of an emergency situation such as computer or electrical failure. The settlement date of the electronic direct deposit will be Thursday, depending on the pay period cycle stated in the employee contract. KGPS offers weekly pay period cycles for all staff.

14.8 Salary Advances

Due to hardship situations KGPS's practice is to allow pay advances to staff when a repayment schedule has been agreed upon and as approved by the Principal.

14.9 Mandatory Benefits and Deductions

KGP adheres to the collection, reporting and remittance of all statutory payroll deductions and benefits including:

- a. employment insurance
- b. vacation pay
- c. wage garnishee
- d. federal and provincial income tax
- e. employer health tax
- f. Canada pension plan(CPP) and
- g. workers compensation (WSIB)
- h. registered pension plan
- i. health care benefits

The benefits offered by KGPS for eligible employees include life insurance, short and long term disability insurance, extended health care benefits, dental and pension. Only an employee who has successfully completed their probation period is eligible for pension and health care benefits. Should an employee wish to decline benefits, the employee must already be insured/covered by the spouse's benefits in order to have this option. Proof will be required by filling out the appropriate paperwork.

14.10 Processing Earnings & Deductions

The employment contract will stipulate in detail the negotiated earnings and deductions the employee will receive during their contract period of employment. The conditions of the employment contract will also state if the employee is salary or hourly and any eligible leave credits granted. The managers in conjunction with the Administrative Assistant are responsible for reconciling leave entitlement for employees on a monthly basis. It is the responsibility of all principal or managers to sign off on their staff's monthly attendance sheets.

Within an employee contract it is stipulated what benefits an employee is entitled to. This does not automatically guarantee receipt of benefits. Employees must submit all necessary forms, authorized by their immediate supervisor/manager according to School procedure in order to receive benefits. Employees are not eligible for benefits until they have completed 3 months of consecutive employment.

The monthly attendance form includes all leave entitlements which is set up by the Administrative Assistant after successfully completing the probation period.

Leave forms are also used to identify eligibility for the type of leave an employee is requesting. This form is used to seek approval for all leaves and overtime beforehand by the requested date and length of time recorded within. The employee will then initial/sign and send to their immediate supervisor for approval in which the supervisor will also initial/sign.

Each employee attendance is kept on the H: drive in their own inboxes.

Other required leave forms include:

- a) return to work
- b) extended leave

As a courtesy to employees, KGPS shall make every effort to advise employees of exhausted leave credits where it impacts issuance of a full regular pay. Failing to advise an employee in advance of exhausted leave credits does not however, prevent processing of a reduced payroll entitlement as employees are equally responsible for reconciling the leave entitlements and balances with their immediate supervisor.

The Administrative Assistant is responsible for informing the Finance Office of any deductions required due to exhausted leave credits.

14.11 Calculation of Irregular Benefits and Deductions

KGPS shall calculate and compensate eligible employees with irregular benefits as they are deemed payable. Irregular benefits could include retroactive salary increases and vacation or overtime entitlements that have been approved for payouts.

An irregular deduction is described as a voluntary, authorized employee payroll deduction such as paying back a salary advance. The total amount of an irregular deduction shall be calculated and presented to the employee, along with the proposed date(s) for deduction. Irregular payroll deductions are subject to approval of the Principal.

14.12 Other Items for Consideration

14.12.1 Death of an Employee

Upon notification of death of a current KGPS employee, the Finance Office will immediately determine the value of payroll entitlement. Any applicable payroll entitlement shall be made payable or forwarded as identified in the deceased employee's personnel file.

14.12.2 Maintenance of Records

All current or active payroll and personnel files will be maintained in locked cabinets. Employees have a right to privacy and accordingly all records shall remain confidential and protected. Regular computer data backups will be maintained by the assigned computer personnel to ensure the integrity of all payroll records.

The Principal or designate will be responsible for maintaining all personnel files. It is also the responsibility of the employee to inform the Principal or designate of any changes such as addresses and telephone numbers.

14.12.3 Division of Responsibility for Payroll Electronic Processing

NOTE DIVISION OF RESPONSIBILITIES ARE NEEDED

Responsibility of regular payroll tasks must be specifically assigned to staff members to ensure internal controls, consistency of records and financial accountability. The same employee cannot complete preparation and enter payroll for distribution.

The Finance Officer will be responsible for:

- a) payroll preparation
- b) predetermined calculation
- c) release of uploaded file to bank

The Finance Officer will be responsible for:

- a) the data input into the accounting system
- b) uploading of file to be released to the bank

The Principal will sign off on each payroll.

Refer to Payroll Procedures for Processing Payroll Electronically

14.13 Monthly Requirements

14.13.1 Attendance Reconciliation

KGPS has a right to expect good attendance from all employees. Expectations must be clear to both management and employees in order for an attendance management program to get maximum results. To avoid unnecessary payroll adjustments, attendance for all employees must be reconciled on a monthly basis. The immediate supervisor and employee are responsible for reconciling the monthly attendance and submitting to the Administrative Assistant. The Finance Officer will be notified by the Administrative Assistant of any payroll adjustments required.

Employee attendance reports are required to be submitted to the Administrative Assistant within one week (5 business days) from the end of the month. If there are any disputes between the immediate supervisor and employee that cannot be resolved, the Principal will determine the final outcome. Any payroll settlements are to be determined by the Principal.

14.13.2 Remittances

The Finance Office shall ensure all statutory employee deductions and employers contributions are remitted on a monthly basis, without penalty or applicable late fees.

The remittances include:

- a) Canada Revenue Agency (CRA) processed through online banking
- b) Worker's Compensation (WSIB) processed through online banking
- c) Registered Pension Plan–processed through preauthorized payment
- d) Health Care Benefits (SSQ/FAS) processed through pre-authorized payment

The responsibility of the Finance Office is to ensure all remittances have been submitted on a timely basis to prevent any late fees or penalties.

14.13.3 Financial Reporting

Financial reports (income statements and general ledger listings) will be provided to each manager. It is the responsibility of each manager to ensure that the payroll has been coded properly to the correct project.

14.14 Calendar Year End

KGPS is required to comply with annual reporting requirements of Canada Revenue Agency (CRA) with respect to payroll, including issuance of T4 forms. The Finance Officer is responsible for the preparation and accuracy of T4 information printed. Employees whose insurable earnings are tax exempt shall be duly noted on the T4 in Box 71.

14.15 Fiscal Year End

After issuing and posting payroll information for the last pay period in the fiscal year (March 31), the Finance Officer will be required to open a New Year. It is common practice to have two fiscal periods open until the audit has been completed.

KGPS's internal controls and operating procedures are intended to detect, prevent or deter improper activities. However, even the best systems of control cannot provide absolute safeguards against irregularities. Intentional and unintentional violations of laws, regulations, policies and procedures may occur and may constitute improper activities.

15.0 WHISTLEBLOWERS

15.1 Confidentiality

A person making a protected disclosure is commonly referred to as a whistleblower. Whistleblowers frequently make their reports in confidence. To the extent possible within the limitations of law and the need to conduct a competent investigation, confidentiality of whistleblowers will be maintained. Whistleblowers should be cautioned that their identity might become known for reasons outside the control of the investigators. Similarly, the identity of the subject of the investigation will be maintained in confidence with the same limitations.

15.2 Get it in Writing

Reports or allegations of suspected improper activities or misuses of company resources are to be made in writing to assure a clear understanding of the issues raised. Such reports should be factual and contain as much specific information as possible to allow proper assessment of the nature, extent and urgency of preliminary investigative procedures.

15.3 Investigation

The School has a responsibility to investigate and report to appropriate parties, allegations of suspected improper activities and the actions taken by KGPS. An internal investigation workgroup will be maintained including the Manager and at least two other senior School officials selected at the time by the Principal.

The workgroup's responsibilities are:

- make sure the proper investigative channels are utilized (including legal)
- develop an appropriate plan to address the reported improper activity
- ensure all appropriate senior officials are apprised of the allegations
- ensure appropriate reporting occurs to funding and regulatory agencies as necessary
- seek expertise as required for the timely and thorough review of allegations
- coordinate and facilitate communications across investigative channels
- monitor progress of investigations to ensure allegations are thoroughly addressed
- coordinate and facilitate in an advisory capacity the corrective and remedial action that may be initiated in accordance with applicable disciplinary procedures.

15.4 Employee Responsibility

All employees of KGPS have a duty to cooperate with investigations. Furthermore, consistent with applicable Personnel Policy, an employee may be placed on "leave" with pay as appropriate, when it is determined by the investigative workgroup that such a leave would serve the best interests of the employee or KGPS. Such a leave is not to be interpreted or recorded as an accusation or a conclusion of guilt or innocence of any individual.

15.5 Duty to Report

Managers, administrators and employees shall report to the Principal or Manager for any allegations of suspected improper activity when any of the following conditions are met:

- a) the matter is the result of a significant internal control or policy deficiency
- b) the matter is likely to receive media or public attention
- c) involves misuse of School resources
- d) the matter involves allegations or events that may result in a criminal act (i.e. Theft)
- e) a potential threat to the health and safety of employees or the public exists.

15.6 Protection

KGPS is committed to protecting whistleblowers from interference with making a protected disclosure or retaliation for having made a protected disclosure.

A KGPS employee or official may not:

- a) retaliate against any person or entity who has made a protected disclosure or
- b) directly or indirectly, use or attempt to use the official authority or influence of his or her position for the purpose of interfering with the right of an employee or other person/entity to make a protected disclosure. KGPS shall take whatever action may be needed to prevent and correct activities that violate this policy.

16.0 GIFTS AND DONATIONS

- 16.1 It is the policy of the Kawenni:io/Gaweni:yo Board to provide for the acceptance of donations and gifts from individuals and organizations. All donations will become the property of Kawenni:io/Gaweni:yo Schools and every effort will be made to honour the intent of the donor.
- **16.2** The objective is to establish procedures for the implementation of K/G Board Policy regarding acceptance of Gifts and equipment.
- **16.3** Gift/Donation: An unsolicited contribution for which there is no reciprocal consideration from the school or K/G Board
 - a) Procedures for Accepting Cash Donations: (e.g., fund raising, corporate sponsorship, scholarships, bursaries)
 - i. Cash donations are usually for purposes such as:
 - providing cash awards and for the purchase of plaques for student achievement
 - assisting in providing funding for educational or team trips
 - ii. Since donors may request a receipt and accurate records are required for submission to the Auditor, all cash donations must be recorded on the **Gifts to Schools** form indicating the following information, donor's name, amount, date and intended purpose of the donation. The Principal shall submit a report to the K/G Board by June 30 of each school year summarizing donations received.
 - iii. All funds are to be deposited into the school's appropriate bank account.
 - b) Procedures for Accepting Gifts of Materials, Equipment, or Cash for the Purchases of Materials or Equipment:

Before the acceptance of any gift of equipment, materials, or cash for the purchase of same, the following factors must be considered by the school Principal:

iv. value of the gift to the school's educational program;

- v. location of the gift in the school building or on the school property;
- vi. applicable installation or repair costs;
- vii. safety, security and maintenance requirements;
- viii. K/G Board standards for equipment (e.g., computers, audio-visual);
- ix. commitment required by the school or K/G Board.

16.4 Consultation with the Donor:

An individual or group wishing to make a donation should consult with the school Principal. The donor should be informed that:

- a) All accepted gifts to schools or to K/G Board will become the exclusive property of K/G Board and part of its inventory.
- b) K/G Board will attempt to honour the intent of the donor as to use and location of accepted gifts but does not make any commitment as to use, replacement or disposal;
- c) The use of the gift will be dependent upon the availability of funds within the school budget;
- d) Installation of, and/or alterations to, K/G Board property required in association with acceptance of the gift shall be subject to the approval of the owner of the building in consultation with the school principal.

16.5 Recognition of the Donor

- a) The Principal is expected to express to the donor the school's appreciation for the gift. In some circumstances, it may be appropriate for a Principal to request that a letter be sent to the donor on behalf of the K/G School.
- a) The Principal will provide to K/G Board in the fall of each year, a list of gifts accepted, their value, and their donor.

16.6 Status of Donations

- a) As stated in K/G Board policy, all donations will become the property of K/G Board. It is recognized, however, that in most circumstances donors desire the property or benefits of the donation to remain at the school. Every reasonable effort will be made to ensure that such is the case.
- b) A Charitable Tax Receipt is available through Six Nations Council but the check or money must be payable to the Council who will then remit the money to the KGPS in a timely manner.

17.0 FUND RAISING GUIDELINES

Definitions - Non-K/G Funds: are cash and cheques collected by students or school staffer outside sources which are to be deposited and administered through the general school bank account.

17.2 Procedures

- a) Source of Funds Collected From Students
 - i) Fees; e.g., student activity fees, student yearbook, tournaments
 - ii) Refundable deposits; books, instruments
 - iii) Excursions; field trips, tickets, registration fees, buses
 - iv) Special events; walk-a-thons, skate-a-thons, dances, concerts, dramatic performances, toy bingos
 - v) Sales; food, milk, clothing, memorabilia

- b) Use of Funds Collected From Students
 - i) Directly for student activities, leadership training, socials
 - ii) When funds have been received for a specific purpose the school shall ensure the proceeds are directed toward that specific purpose
- c) Use of Funds Collected From Other Sources
 - i) Interest on Non-K/G Board Funds
 - ii) Commissions and rebates, profits from book fairs, bake sales, and other classroom fund-raising projects, vending machines, and food sales.
- d) Use of Funds- Collected From Other Sources
 - i) Funds directed toward a specific purpose
 - ii) School-related activities for students or student benevolent fund use
 - iii) Proceeds directed toward student activities
- e) Third-Party Fund-Raising

All fund-raising activities shall be approved by the Principal. While fund-raising may be governed by K/G Board policies and procedures, groups such as Home and School Associations are independent and maintain their own organization and bank accounts.

The Home and School is expected to give an account of the fund raising amounts raised and a monthly report to the board.

PRINCIPAL NEEDS TO REVISE OR DEVELOP FUNRAISING GUIDELINES FOR TEACHERS AND STAFF

Note all financial forms can be found on the Shared Common S:\Financial