

SECTION 6: FINANCIAL PLANNING AND MANAGEMENT

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FINANCIAL PLANNING AND MANAGEMENT

6.A. Funds and Property of People Supported

6.A. 1: Bank Accounts

It is an expectation that an individual's monies be kept in the person's name and that they have a bank account in their name whenever possible. It has become increasingly difficult to get banks to establish bank accounts for the people we support.

6.A. 2: Monies received

Eligible people receive their B.C. Persons With Disabilities (PWD) funds from the Ministry of Social Development & Poverty Reduction on a monthly basis (generally the third week of the month for the following month).

Individuals age 65 or over are not eligible for PWD benefits and will receive monthly payments from the federal Old Age Security (OAS) program instead.

Eligible people receive a federal GST Credit payment on a quarterly basis.

Arrangements should be made (with the assistance of the manager, as needed) for direct deposit when the person has their own bank account. If Kardel holds the funds of the person served "in trust", arrangements should be made by the manager for the cheque(s) to be forwarded to the office.

6.A. 3: Expenses

It is important that people supported are informed regarding the expenses that must be covered from their personal funds. When the person supported is able to complete their own banking and care for their own money, the manager and the Director of Finance should establish with the person a clear process for paying expenses they will be responsible for. Appropriate expenses are explained in the "Comforts" section of the Policy and Procedure Manual (6.B.1).

6.A. 4: Co-signature

In some situations, the bank will open an account in the person's name but will require a co-signer on an individual's account. Where there is family involvement, families may choose to co-sign, then make arrangements to make the money available for the person supported as needed.

6.A. 5: Controls

Where Kardel is involved in assisting a person supported with their finances, managers should receive a monthly statement from the bank (or the Kardel office in situations where there is no

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bank account and Kardel acts as Trustee) and sign the statement after reviewing it for accuracy. Alternatively, they should initial the bank debit slips and review the balance for accuracy. All discrepancies should be investigated.

Information from the monthly statements should be communicated to the person supported in the most effective way for that individual. All financial records must be kept secure, confidential, but also accessible to the person who owns the records or their legal representatives.

An annual review is to occur at the time of the Person Centred Planning meeting to ensure expenditures and financial controls are appropriate. In situations where people supported are not able to manage money, their families, advocates, or the Director of Programs and Quality Assurance will be requested to review expenditures to ensure they concur that the transactions are in keeping with the best interest of the people supported.

6.A. 6: Bank Cards

People we support may be issued a bank card for ease and convenience of banking through ATM machines. When the person is not able to adequately maintain the safety and security of the bankcard, the manager, with appropriate consent, assumes responsibility for the security and safekeeping of the card. The manager is to keep the card in a safe and secure location. Only the manager and the person served are to have access to the card and the PIN number. If the manager is assisting with banking, in conjunction with the person supported they should change the PIN number every six months, to ensure security. The manager is responsible for ensuring adequate funds are available for the person's use. Designates in the absence of the manager would have access to the PIN.

6.A. 7: Funds held by Accounting

When person(s) supported are accepted into a group home operated by Kardel who are not able to manage their own funds, their family member(s) or other representative will undertake responsibility for the management of funds.

In situations where an individual residing in a Kardel group home

- cannot obtain a bank account in their own name,
- has no family member or other representative who can manage the person's funds,
- and the Public Guardian & Trustee is not willing to assume responsibility for the person's finances,

Then as a last resort the person's funds may be paid directly to Kardel "in trust" for the person. These funds will be deposited to a company bank account that isolates the funds of the people supported from the general funds, and the individual account records will be maintained by Kardel's accounting system. These individual accounts will show the dates of deposits and dates all funds are paid out. For accounts held in trust, managers may request direct payment for major purchases made on behalf of the person by completing a Cheque Request in the

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normal manner, identifying the nature of the purchase and for which person the purchase is for. Managers may also request funds to have on hand to cover future expenses that are to be covered by the person's comfort money. The manager is responsible for ensuring the person's consent (see informed consent). Release of the funds requires two signatures: the CEO's and the Director of Programs and Quality Assurance's.

Upon death, an individual's funds in trust will be kept secure until instructions are received from the Administrator of the individual's Estate, whereupon they will be paid out as directed by the Administrator. If possible, all individuals who have funds in trust should have a written will naming an executor. A Kardel employee cannot be the Executor or Administrator for the Estate of an individual supported. In cases where no executor is named, and no person assumes the responsibility of being named the Estate Administrator, Kardel will alert the Public Guardian & Trustee so that their office can assume responsibility for the Estate. In some cases, the Provincial Ministry will claim funds in the person's trust account to recover funeral costs when the Ministry has assisted with those costs.

6.A. 8: Tracking and Monitoring Expenditures on Behalf of the Person Supported

Where Kardel is involved in supporting an individual with their spending, the manager is to track in ShareVision how the person's money is spent and must keep receipts. Any receipts and expenditures, (including withdrawals from banks/trust funds; gifts, cashed cheques, etc.) shall be entered into ShareVision.

The staff member taking the funds from the home will be responsible for checking that the funds on hand are equivalent to the balance showing in ShareVision. Upon return, the receipts for purchases shall be submitted and the balance is again checked. All initialed receipts must be kept with the individual's financial records.

The Manager shall check each person's ledger on ShareVision regularly. As part of the duties for night shift staff members, they must review the balance in the ledger on ShareVision and the cash in the wallets to ensure that the day balances i.e. the journal balance and the money on hand coincide. Night staff initial if it matches. If it does not match, the night staff will write up the details for the manager to follow up.

6.A. 9: Income Tax

Managers are responsible for ensuring income tax returns are submitted by or on behalf of the people supported within the homes and that people supported are receiving GST rebates. In some cases the Manager may need to personally assist the individual with filing their income tax, but only as a last resort. Managers should not typically have to submit tax forms on behalf of an individual if another party has responsibility for the individual's overall finances.

6.A. 10: Eligibility for Persons with Disabilities Benefits

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Previously, under the Employment Assistance for Persons with Disabilities Regulations, people remained eligible for Disability (PWD) Benefits only if their asset level is below \$5000.00. This has now been raised to a limit of \$100,000.

People who are 65 or over receive OAS benefits, not PWD benefits. There are no asset limits for OAS recipients.

6.A. 11: Accounts administered by the Public Trustee

The Office of the Public Guardian and Trustee is a provincial government office. The staff in this office make decisions for people who cannot manage their own affairs and do not have a Representation Agreement (or enduring power of attorney) or any family members willing or able to make decisions for them. People whose affairs are managed by this office are under “public guardianship”. If a manager is unsure if the person has a Public Trustee account, the Public Trustee office should be contacted.

The manager writes to the Public Trustee directly for financial support when a Public Trustee administers a trust account. They may request funds for expenses above what is basically covered within group home living. The letter is directed to the Public Trustee finance department to the attention of the individual’s worker. The person’s ID number should be on the correspondence. If the item requested is expensive, copies of price quotes must be attached. Indicate the reason the item is needed e.g. special birthday purchase, occupational therapy/physiotherapy equipment etc. Periodically the Public Trustee requests that the manager complete a form for their records. The Public Trustee completes income tax returns and the Public Trustee receives the GST cheques for the individuals who have Public Trustee accounts. Managers should keep a record of the expenditures of funds received from the Public Trustee in the same manner that they keep the records of any person supported.

Managers should discuss with the Public Trustee Case Manager the funds available in the account to ensure spending is planned appropriately.

Fees are charged to the person’s account by the office of the Public Trustee for administration of the funds.

<i>Policy:</i>	<i>Financial</i>
<i>Issued:</i>	<i>March 2002</i>
<i>Reviewed:</i>	<i>July 2009</i>
<i>Reference:</i>	<i>Public Guardian and Trustee Fees Regulation http://www.trustee.bc.ca/feereg.htm</i>

6.A. 12: Asset Registry

Accurate and up-to-date records of the person’s belongings e.g. bed, dresser, chair, T.V. etc. must be kept on ShareVision. The intent is to ensure that, with changing staff members and over time, possessions are recognized as belonging to the person supported.

Managers are to keep current the Asset Registry for each person supported. When a person moves into one of the group homes, he or she should have a completed registry from the previous caregiver or parent. The registry should be updated whenever a person acquires or

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disposes of a possession. The value of the possession should be noted if known. Items owned should have the person's name on them. Clothing is to have the person's name on it in an inconspicuous place to ensure persons' wardrobes are not confused.

6.A. 13: Registered Disability Savings Plan

Persons supported and their representatives should be informed of the option of opening an RDSP as a way to build and protect funds for future disability-related needs, and this option should be made known during times where financial planning is being done (such as during a PCP). Kardel will not serve as the administrator ("holder") for any new RDSPs opened up, but where Kardel is involved in assisting with an individual's finances the manager and the Director of Finance should provide any appropriate information to the person supported or their designated holder to assist them in setting up the RDSP. Information is available through the PLAN website. Questions may be directed to PLAN. Where older RDSPs have Kardel designated as the holder, the RDSP statements will come to the Director of Finance who will serve as the contact with the financial institution. These historical RDSPs will be moved to the administration of designated representatives as such representatives are formally identified by the individuals affected.

6.A. 14: Funds in the homes

When managers are responsible for assisting an individual with their personal funds, they are to ensure there is no more than \$200.00 for each person supported kept on hand in the homes at any time. Funds in excess of this should be forwarded to the office for deposit into the trust account, or deposited in the person's bank account.

Where people supported are responsible for their own funds, they should be encouraged to keep less than \$200.00 on hand or accept any risk inherent in managing their own money. Kardel will not assume responsibility and will require a signed statement acknowledging the person's responsibility.

6.A. 15: Shelter Contribution and Repayment agreement

All individuals in CLBC-funded residential programs will pay a monthly shelter contribution in the amount specified by Provincial legislation (for individuals under 65) or by CLBC policy (for individuals 65 and over). Each payment is due on the first of the month for individuals supported who live in Kardel group homes. For simplicity and clarity of records, the shelter contribution on behalf of individuals supported who receive monthly PWD funding should be paid directly by the Ministry to Kardel whenever possible. A written explanation of the aforementioned policy is given to any individual supported in a Kardel group home (or their representative if applicable), and a copy is kept in the Kardel records.

Individuals who permanently leave a residence part-way through the month will be repaid a pro-rata amount of the month's shelter contribution equal to the percentage of full calendar days

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remaining in the month at the time the change becomes official. In the case of deceased individuals supported, the repayment will be made to their estate.

6.B. Comforts, Recreation Funds, Fees

6.B. 1: Comforts

“Comforts”: is a term used to describe the portion of an individual’s monthly funds remaining after their shelter contribution, available to meet personal care and recreation needs.

When the needed items or services are covered in the home’s operation budget, the person’s personal funds should not be used. Comforts may not be used to purchase items for other residents. Some examples of items intended for individual use to be charged to comforts are: hairdressing supplies and services, deodorant, toothpaste, facials, manicures, nail products, makeup, shaving supplies; admission fees, memberships, magazine subscriptions, newspapers, music, craft supplies, non-prescription medications (on a sliding scale), DVD’s, order in food more frequent than once a month, gifts to family and friends etc.

Comforts money may be used to cover the cost of hiring therapists/entertainment etc. that will benefit the people in the home (i.e. music therapist, massage therapist, etc.) and costs should be allocated on a proportional basis.

Some people who received no gifts from family or friends supporting them may have gifts purchased for them with their own comforts money, depending on the amount of comfort funds available, and the needs and desires of the person.

6.B. 2: Recreation Funds

A limited budget is provided to the homes and program to cover the costs of items that provide leisure and recreation for the people supported. The responsibility for determining the best allocation of limited funds and remaining within budget rests with the manager of each home and program.

The recreation funds are intended to cover the following:

- To cover staff member’s admission/participation to movies, IMAX, swimming, skating, bowling, craft fairs, plays, museums, and musical events. The admissions costs for the person supported come from their comforts money.
Note: Leisure Assistant’s Passes should be arranged in advance every year through Recreation Integration Victoria. The passes allow for free admission for the attendants of people with disabilities.
- Access 2 Entertainment Cards, to cover the cost of the staff member to accompany a person with a disability to a movie in designated theatres.

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To cover staff members' transportation costs when they accompany people on any form of transportation i.e. buses, trains, ferries and/or taxis. Handidart is free for attendants if the person requires assistance. There is a charge for an escort, so the needs of the person should be made clear on booking to avoid charge. B.C. Ferries require a doctor to complete a medical form to allow 50% off the cost of sailing for a person and their attendant.

- To cover the cost of staff members' snacks and meals in restaurants. Receipts need to be submitted and initialed by the manager. The frequency and type of outing that involves staff members incurring expenses must be pre-planned and approved by the manager. A guiding principle should be that the cost of the staff member's snack or meal does not exceed the cost of the supported person's snack or meal, and maximums are consistent with the HEU collective agreement (As of April 1, 2017: Breakfast: \$10:41; Lunch \$12:75; Dinner: \$22.11) plus 10% tip. Snacks are not specified in the collective agreement and remain at \$3.00.
- The cost of "order in" food i.e. pizza, Chinese food etc., at the request of a person supported, may be covered from the recreation budget once a month maximum. Any increased frequency should be paid for from the supported person's comforts money.
- To cover the cost of purchase of videos/DVD's and music for the home that benefits all people supported. However, videos/DVD's and music purchased for an individual person are covered from that person's comfort money. Video/DVD rentals, purchase or downloads for the enjoyment of more than one person should be cost shared among each person's comforts money.
- To cover the cost of arts and craft books and supplies i.e. paints, play dough, etc. that will benefit all people in the home
- To cover extra party costs, purchased separately from regular groceries. These items may include: decorations, dish rental, specialty cakes and grocery items above and beyond for people invited; small prizes; entertainment
- To cover the cost of "hobbies" that exist for the benefit and interest of all the people in the home i.e. aquarium, fish and fish food; plants and planters; However, these types of supplies used by one person for their own recreational purposes will be covered by that person's comforts money

Vacations:

Projected costs for vacations must be submitted by the manager via ShareVision to the Director of Programs and Quality Assurance for approval. Projections should include the costs of transportation, food, accommodation, recreation and additional staffing costs. Projections will assist in ensuring that holiday plans are in keeping with the budgets available, and avoid

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excessive cost overruns. Projections will also assist in ensuring fair and somewhat equitable distribution of holiday opportunities for the people served by Kardel.

In most cases the cost of hotel rooms for staff members is to be covered by recreation funds and the rooms for people supported are covered by their comforts money. The cost of staff members' meals are consistent with maximum rates noted in the collective agreement, and are paid from recreation funds. Receipts must be submitted. Items such as the rental of a cottage for staff members and people supported would be billed on a prorated basis between comforts and recreation funds.

6.B. 3: Fees for Day Program

Futures Day Program charges a fee that covers the cost of recreational outings, admissions, and materials which are not covered by the program's budget from CLBC. The fee may be adjusted to reflect actual costs of the program from time to time. At the present time the fee is \$20.00 per month. In cases where this poses hardship, requests may be made to the director of Programs and Quality Assurance for exemption or reduction of the fee.

6.B. 4: Futures Club Recreation Budget

The manager of the Futures Club Program allocates the recreation budget.

An example of what the recreation budget covers includes:

Admissions: Including staff members	Art supplies	Bus fare: Including staff members
Decorations	Cooking: Groceries	Craft Supplies
Materials to make items for benefit of people supported	Entertainment	Games
Museum	Halloween Candy	Magazine
Order in food	Memberships	Movies
Plays	Musical events	Newspapers
Rentals	Party food	Photos
DVDs	Prizes	Puzzles
Other projects	Stationary and writing materials	Swimming
	Transportation costs for people supported	Training materials such as books/games to teach

<i>Policy Group:</i>	<i>Procedures and Protocols: Budget Allocation/Cash Management Policy</i>
<i>Issued:</i>	<i>July 1998</i>
<i>Revised:</i>	<i>May 2001</i>
<i>References:</i>	<i>Income Assistance Manual: Part 9: Section 8: Legal Authority: Gain Act: Section 2: Gain Regulation Section 22 (1) ©&(d)</i>

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6.C. Financial Practices

6.C. 1: Operational Expenses

For purchases such as groceries, automotive expenses (including fuel and repairs), medical equipment repairs/replacement/maintenance, cleaning supplies, household supplies, household maintenance, etc:

- Managers are to review invoices/receipts for goods purchased, and initial each invoice/receipt, indicating approval for payment, and forward to the Finance Department. Staff members, when they make a purchase and get a receipt, should initial the receipt
- A manager's purchasing limit is \$250.00. Administrative approval through the Director of Finance is required for purchases between \$250.00 and \$750.00. Purchases over \$750.00 require approval by the CEO
- Invoices, receipts, cheque requests will be reviewed by the Finance Department for reasonableness and compliance with policies.

6.C. 2: Petty Cash

Petty cash is to be considered as a "loan to the manager" which needs to be accounted for with receipts. It is used to purchase any item where cash is required. All petty cash spent is allocated to the appropriate category on the Petty Cash Reimbursement Request and submitted when replenishment to the original amount is required. The manager will verify that the petty cash account is balanced or account for discrepancies prior to submitting the Petty Cash Reimbursement Request for payment.

Occasionally, (four times per year) reasonable costs may be paid from petty cash for food for staff meetings. It should be reported on the Petty Cash Reimbursement Request under Miscellaneous. Gifts for employees are not to be paid for through petty cash.

6.C. 3: Durable Goods

Appliances, furniture, entertainment equipment, etc. must be pre-approved. All requests must be submitted to the Finance Department for approval.

6.C. 4: Capital Equipment / Asset Registry

No item of capital nature may be purchased, replaced, or disposed of, without the permission of the Director of Finance or the CEO.

All Kardel-owned items (whether capital items or not) at the home or program which would cost more than \$100 to replace should be listed by the Manager in the asset registry for the program which is located on ShareVision. This registry should be reviewed for accuracy by the Manager

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periodically, at minimum annually at the end of the fiscal year. At the same time, the condition of the asset should be reviewed, and if it shows signs of approaching the end of its useful life soon, this should be reported to the Finance Department or CEO.

6.C. 5: Warranties

Warranty documents should be scanned and attached to the item's record on the Sharevision asset registry. The original copy should be kept in a warranty file by the manager in the home for ease of access.

6.C. 6: Risk Management

Effective risk management ensures the protection of the interests of people supported, as well as families, staff members, volunteers, the public, and the continuity of organizational operations. Because risks are present throughout the organization operations, successful delivery of services is contingent upon effective management of risks.

Our goal is to identify and reduce or eliminate risks to people, organizational property and interests; to minimize and contain the costs and consequences in the event of harmful or damaging incidents arising from those risks; and to provide for adequate and timely restoration and recovery.

Risk management is the responsibility of everyone.

1: Kardel develops an ongoing risk management plan to address every foreseeable area of risk and note strategies in place to reduce, eliminate or manage risk. The plan is reviewed by the Directors and the Occupational Health and Safety Group, and approved by the CEO.

2: The Risk Management plan involves the following steps:

- Risk identification on a risk worksheet, including evaluation of the risk and a reference to how the risk is managed;
- Where an area of risk is deemed to be high risk, goals are developed and strategies outlined to reduce or minimize the risk;
- Responsibility for monitoring the risk management plan and adjusting as necessary is assigned to the Director of Programs and Quality Assurance.

<i>Policy Group:</i>	<i>Financial</i>
<i>Issued:</i>	<i>December 2007</i>
<i>Reviewed:</i>	<i>July 2009 November 2013</i>
<i>References:</i>	<i>Executive Management Solutions: S. Hill Managing your Risk with CARF standards</i>

6.C. 7: Insurance

Kardel is insured under AON Reed Stenhouse (CLBC-provided); Intact Insurance (through our agent Megson Fitzpatrick); ICBC; and WorkSafe BC. The Director of Finance and CEO review insurance needs with our agent annually.

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A business insurance policy is in place which includes: property damage, personal injury, medical payments, tenants legal liability, etc.

Comprehensive General Liability insurance is arranged by CLBC/Aon Reed Stenhouse Inc., and includes, among other things: Medical Malpractice, Director's Liability, Counselling and Consultation Liability. This policy only covers those operations for which we have a valid contract with CLBC.

6.C. 8: Bad Debt

The CEO and Director of Finance review accounts receivable on a quarterly basis. For outstanding accounts, a demand letter is sent by the office. If no response, we make a decision re: directing the solicitor to send a new demand letter, proceeding to small debts court, or writing it off, depending on the amount and the likelihood of collection.

6.C. 9: GST: ICBC Claims

Where vehicles are registered to a company such as Kardel, ICBC will ask the registered owner to pay the GST, regardless of who is at fault. This is based on the assumption that registered companies have the ability to reclaim the GST on a quarterly basis. With Kardel, it is not possible for us to reclaim the GST on group home vans. We should refuse to pay the GST and advise the requesting party that Kardel cannot recover the GST.

6.C. 10: Contracted Services

Definition: Arms-length third party agreements which fall outside the employee/employer relationship as defined by Canada Revenue Agency.

Contracted services will:

- Be provided under written agreement and evaluated regularly;
- Be monitored for cost effectiveness based on industry standards;
- Have concerns addressed in the same manner as resolving concerns generally within the company
- Be approved by the CEO and reviewed for cost effectiveness.

<i>Policy Group:</i>	<i>Policies and Procedures</i>
<i>Issued:</i>	<i>November 2006</i>
<i>Revised:</i>	<i>July 2009</i>
<i>References:</i>	<i>CSSEA guidelines re: employee or contractor</i>

6.C. 11: Transportation Allowance/Mileage

Kardel employees may claim vehicle expenses on a cents per kilometer basis on the Kardel Mileage Log form. The claim must indicate the dates, destination and/or purpose of any kilometers claimed. Individual Support Network employees must also indicate the name of the person supported. All claims must be submitted to and approved by the Manager. Employees

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must submit their monthly claims prior to the 15th of the following month in which they were incurred. Staff members who leave Kardel's employment must submit all claims within 2 weeks of their last day of work.

It is suggested employees get a copy of the Income Tax Guide: Employment Expenses, which explains Vehicle Expenses in detail. Canada Revenue Agency requires a vehicle log be kept to explain expenses. This will assist in determining eligible expenses by their criteria, and prevent them treating vehicle expense claims as taxable income.

Employees may not charge for transportation from home to place of employment. For example, employees may charge from the place of employment to any location and return, including the central office while on company business. However, employees may not charge from home to either central office or the group home or day program.

6.C. 12: Cheque Requests

The cheque request form is used to request reimbursement to staff members who paid for expenses out of pocket, to request payment to a vendor where an invoice is not being submitted, or to request funds for the people supported. Cheques are done semi-monthly at the middle and end of each month. The cheque requests must be approved and received by the accounting department by noon on the Tuesday the week before the cheque date.

The Cheque request form is not used for petty cash. Whenever possible, outside vendors should invoice Kardel directly.

6.C. 13: Confidential Administrative Records

All administrative records and personal records are kept in a locked cabinet in a locked office. All administrative records are password protected on the computers. Information from the computer drives is securely backed up off-site.

6.D. Purchasing: Expense Approval and Review

6.D. 1: Furniture and Appliances

When furniture or appliances require replacement, the manager should request approval from the Director of Finance prior to proceeding. Indicate in writing the urgency of the need. The Director of Finance has a list of suppliers/salespeople that have provided discounts in the past, as well as suppliers that will recognize the warranties for furniture/appliances used within the homes/program (viewed as a business under some warranties).

Managers should get 3 quotes of suitable products and make a written recommendation with rationale to the Director of Finance or CEO. Some suppliers that we have dealt with in the past are willing to accept credit card payment over the phone. If not, the manager makes a cheque request and arranges payment, or, if possible, covers the cost through their petty cash fund.

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6.D. 2: Groceries and Vehicle Expenses

Managers must initial or stamp, indicating that they have reviewed the purchases. All homes have a CO-OP card and membership. Gas is to be purchased at Save On or CO-OP gas stations. Receipts should be forwarded by the first of the month.

The following principles were established pertaining to shopping for groceries:

- Purchase quality, nutritious products;
- Use grocery shopping as a place to build relationships for the people we support in the community;
- Have the people we support involved in grocery shopping to the level they choose;
- Ensure cost control;
- Buy local to support our community;
- Use stores which are accessible for all people with disabilities
- Purchase proper amounts, specific to needs, to avoid waste;
- Recognize the personal taste preferences of the people we support;
- Encourage stores we support to hire people with disabilities;
- Reduce the cost of gas and delivery as much as possible.

All homes have a grocery charge account, some of which have negotiated discounts. All minor purchases that may occur at other stores should be paid for in cash. CO-OP fuel and grocery cards for purchases on the Kardel CO-OP account must be kept in a safe place and any lost or stolen cards must be reported immediately to the Director of Finance and CO-OP.

6.D. 3: Cable

All cable bills are mailed directly the office. Kardel pays basic cable only. Any amount above basic cable will be invoiced to the person(s) supported who use the service. Where the individual has their own independent financial arrangements the manager collects the invoiced amounts from them and forward the money or cheques to the office. Where Kardel holds their funds in trust, payment will be made from the trust.

6.D. 4: Telephone

All telephone bills are mailed directly to the office. They are returned to the manager if there are unusual charges. The manager is to review long distance charges and initial calls that are work related. Personal long distance calls should not be on business phones, except in an emergency. In those situations, the manager would collect the amount, including taxes, from the employee and indicate it as a credit on petty cash request form. There is a cost associated with *69 and should not be used by staff members in the home.

6.D. 5: Medications

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Pharmacies will mail most statements directly to the Kardel office at the end of each month. Medication not paid directly by the person supported provincial coverage will be recovered from the relevant person as per the formula for medical supplies (see 8.A.2) The Finance Department will distribute copies of the invoices for the manager's review and any apparent irregularities should be followed up by the manager with the pharmacy and the Finance Department alerted. Where an individual or their representative (such as the Office of the Public Guardian and Trustee) pays for pharmacy costs directly, the invoice will be mailed to them by the pharmacy, and any review of the pharmacy records would have to be done by the manager contacting the pharmacist directly. There is no "back ordering", and homes are only billed for what they have been sent. When supplies are received, the staff members will need to check amounts and make a note to reorder.

Special Authority is given based on specific criteria for a drug not normally covered by Pharmacare. Physicians must periodically reapply for Special Authority for Pharmacare to cover the costs. The physician sends a form to Pharmacare requesting coverage. The pharmacy has been requested to alert the manager two months prior to the special authority expiry date so that the manager may have the physician reapply for this coverage. There is now a 6-8 week wait on Special Authority medication approval. We are billed for the amount until the authority comes through

6.D. 6: CO-OP Cards

See 6.D.2

6.D. 7: CIBC Debit Cards

CIBC debit cards will be issued to Managers to assist in managing their petty cash fund; the cards must be signed for at the bank prior to use and any lost or stolen debit cards must be reported immediately to the Director of Finance and CIBC. Managers have online access to the bank account records, and it is required that they do a monthly bank reconciliation as part of preparing their petty cash reimbursement claim. The reconciliation and petty cash claim will be considered the manager's approval of all bank transactions within the reconciled month.

6.E. Unethical and Illegal Practices

6.E. 1: Fraudulent Practices, theft, waste and other wrongdoing

Kardel is in receipt of public funding to provide services under contract to CLBC. The agency is committed to protecting its revenue, property, information, and other assets from any attempt by its own employees or others to gain financial or other benefits by deceitful means.

Fraudulent practices include, but are not limited to:

- Forgery or alteration of cheques;
- Misappropriation of funds, supplies or other assets;
- Waste;
- Any irregularity in the handling or reporting of money transactions;

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- Misappropriation of furniture, fixtures and equipment; seeking or accepting anything of material value from the people supported, their families, suppliers other than token gifts of thanks of limited monetary value;
- Unauthorized use or misuse of property, equipment, materials or records; any computer related activity involving the alteration, destruction, forgery or illicit manipulation of data, misappropriation of copyright software;
- Any fraudulent claim for reimbursement of expenses

An objective and impartial investigation will be conducted regardless of the position, length of service or relationship of the employee with the company. Each manager is responsible for maintaining a system of internal control consistent with company policy, to provide reasonable assurance for the prevention and detection of fraud, misappropriations and other irregularities. Timely action is necessary and follows the time frames for resolving concerns within the company. The Director of Human Resources, in consultation with the CEO, has the primary responsibility for the investigation of all activities as defined in this policy. In all circumstances, where reasonable suspicion of illegal activity exists, police and the funding body will be notified immediately. Kardel will pursue every reasonable effort, including legal action, to effect recovery of the losses from the offender.

It is an expectation that any staff member who suspects fraud or any fiscal wrongdoing will bring the concern to the attention of the manager as early as possible; or, when that is not possible, to the CEO.

Once a suspected fraud is reported, immediate action shall be taken to prevent the theft, alteration or destruction of relevant records or other materials that may be taken into evidence. All participants in a fraud investigation shall keep the details and results of the investigation confidential. Where warranted, disciplinary action, up to and including dismissal, shall be taken.

6.E. 1 (a) Whistle Blower Protection

There will be no reprisals for any person bringing forward concerns about fraudulent practices, theft, waste or other wrongdoing for investigation.

No employee, having acted in accordance with the requirements of our Code of Ethics and/or Fraudulent Practices policy, shall be subjected to any of the following:

- Dismissal or threatened dismissal;
- Suspension or other discipline, or threats to suspend or invoke other discipline
- Imposition of any penalty
- Intimidation, coercion, or harassment

The violation of this section will result in discipline up to and including dismissal.

6.F. Fund Raising Activities

Fund raising activities, such as garage sales or bake sales, may occur on a Kardel site to raise money for items that are above our budgets under the following conditions:

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- Proceeds benefit all of the people residing within the home e.g. wheelchair swings
- People contributing to the event should be made aware of the projected results of the proceeds
- Requirements for staff member's time for organization are not excessive, diminishing time for support duties
- Manager has approved the event and the timetable
- People supported benefit from being involved in the activity
- People supported approved of the event at their home

6.G. Business License

The Municipality in which the home/program is situated sends out the invoice annually for business licenses. They are paid by the Kardel office. In keeping with the requirement of the business license, they are displayed in the office of the Manager/Coordinator.