



City of Markham

Cash Handling Audit

April 18, 2017

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April 18, 2017

Mayor and Members of Council,

I am pleased to present the cash handling audit report ("report") of the Auditor General for the City of Markham. To ensure the results of our audit are balanced, we have provided in the report a summary of identified strengths as well as observations and recommendations for improvement.

The audit work was completed on January 4, 2017. The report was discussed with the City of Markham's management and executive leadership team, who have reviewed the report and provided their responses within. This report is provided to you for information and adoption of the City of Markham's proposed action plans.

Based on the audit, the City of Markham has adequate procedures in place over cash handling processes; and, the audit found efficient and effective internal controls surrounding cash handling. Furthermore, there were several strengths noted in the areas of internal controls with respect to segregation of duties relating to recording of cash transactions and preparation of deposits; use of safes to keep cash secure; effective monitoring and routine conduct of surprise audits and, oversight over the issuance of refunds.

Opportunities for improvement exist around having consistent procedural documentation for all cash locations, development of cash handling and change float policies, implementation of consistent cash handling procedures (i.e. ensuring senior level access to safes only, ensuring all cash is counted by a second verifier, cash count documentation is maintained), optimal security camera placement, and, formation of a whistleblower hotline.

The report will be posted on the City of Markham's website and made available to the public after tabling to Council.

Sincerely,

A handwritten signature in black ink, appearing to read 'Geoff Rodrigues', with a stylized flourish at the end.

Geoff Rodrigues, CPA, CA, CIA, CRMA, ORMP

Auditor General, City of Markham

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EXECUTIVE SUMMARY

Cash handling occurs at almost all of the City of Markham's ("City") locations; and, ensuring adequate processes and internal controls are in place to mitigate significant inherent¹ risks is essential for maintaining the City's reputation and financial stability. Annually, the City collects the majority of its payments through cheque, debit and credit card. These three methods account for 94% of total payments made at all City locations, resulting in the remaining 6% of payments made with cash. Of the 6% of cash payments, 83% of cash is collected at the Civic Centre location, with 99% of cash payments made at Cash Management.

As Auditor General for the City, MNP LLP ("MNP") evaluated the City's processes for cash handling ("processes") to report on the adequacy of the City's internal controls. The focus of the audit was in the following areas:

- Processes and procedures followed by City staff at key times during each business day:
 - Beginning of the day/shift to open the location;
 - During the day/shift to process transactions; and,
 - End of the day/shift to close the location and safeguard cash collected.
- Deposit and reconciliation processes and procedures; and,
- Monitoring of bank balances and conducting surprise cash audits at each location.

Based on the audit, the City has adequate processes and procedures in place; and, the audit found efficient and effective controls surrounding cash handling. Noted areas of strength include internal controls with respect to segregation of duties relating to recording of cash transactions and preparation of deposits; use of safes to keep cash secure; effective monitoring and routine conduct of surprise audits and, oversight over the issuance of refunds.

Opportunities for improvement exist around having consistent procedural documentation for all cash locations, development of cash handling and change float policies, implementation of consistent cash handling procedures (i.e. ensuring senior level access to safes only, ensuring all cash is counted by a second verifier, cash count documentation is maintained), optimal security camera placement, and, formation of a whistleblower hotline.

¹ The risk derived from the environment without the mitigating effects of internal controls; Institute of Internal Auditors.

BACKGROUND

The City manages payments from residents through cash, debit, credit and cheque at various locations. Primary locations with cash handling include the Markham Civic Centre (i.e. Contact Centre, Cash Management Office, Planning Department, Building Department, and Legislative Services Department), various Community Centres and Libraries, the Markham Museum, Flato Markham Theatre and the Varley Art Gallery. Additionally, payments are made at Milne Park and waste depots across the City. The City relies on several different systems for cash handling, including the Point of Sale system ("POS"), the Program Administration Facility Booking System (i.e. CLASS) and TixHub (used at the Theatre), for online registration and payment processing.

In addition, as a result of the volume of cash transactions and activity the City receives from payment cards (i.e. debit and credit), the City is required to be compliant with certain Payment Card Industry Data Security Standards ("PCI DSS").

Annually, the City collects the majority of its payments through cheque, debit and credit card. These three methods account for 94% of total payments made at all City locations, resulting in the remaining 6% of payments made with cash. Of the 6% of cash payments, 83% of cash is collected at the Civic Centre location, with 99% of cash payments made at Cash Management. Minimal cash is collected at the City's other locations.

The City's cash handling processes and procedures can be summarized into five sub-processes, which are described below:

Beginning of Day/Shift: When the City's various locations open for each day, the POS terminals are started, cash floats are obtained from the safe and counted, and cash deposit sheets and other daily documentation is readied for the day.

During the Day/Shift: As transactions occur, they are entered into the POS system, payment is accepted, receipts are provided, and transaction records are maintained. If there are any cash transactions over the set threshold, a second-person count verification is obtained and documented on transaction records.

End of Day/Shift: When the City's locations close for the day, the POS systems are shut down and the daily transaction reports are run. Cash count and reconciliations are performed and documented. Cash floats are tallied and separated from deposit amounts, which are placed in a safe until the scheduled deposit pick-up. Reconciliation and deposit documentation is organized and placed in a safe until the scheduled delivery to the Cash Management Office.

Deposit: Prior to deposit pick-up, each location re-counts, reviews and verifies the daily deposit amounts and documentation. Deposit slips are completed and signed and deposit amounts are placed in the bank deposit bag. The deposit pick-up slip is completed and signed to acknowledge delivery. The deposit log is updated.

Monitoring and Audit: The Cash Management Office regularly reviews the daily bank statements to track and record deposits of cash amounts. Discrepancies with deposit documentation/records are followed up and cleared. Twice a year, the Cash Management Office conducts a surprise audit of each location's POS float, change box and petty cash

balances to ensure that the assigned amount is maintained by the location and any variances/differences in the balances are investigated.

OBJECTIVE

The objective of the audit was to evaluate the processes and controls in place over cash handling, identify strengths and/or weaknesses, and provide recommendations for improvement, ensuring they align with the City's operating environment. This was accomplished by performing the following:

- Evaluation of the effectiveness and efficiency of policies, processes, procedures and controls for cash handling (i.e. payments received with cash, debit, credit and cheque);
- Assessment of whether roles and responsibilities for cash handling procedures are adequately segregated; and,
- Development of a roadmap to identify, document and describe the activities that are required by the City to achieve compliance with PCI standards².

SCOPE

The scope of the audit covered the period November 1, 2015 to October 31, 2016, and focused on the following:

- Review of background documentation related to cash handling and cash reconciliation activities, such as:
 - Petty Cash/POS Floats Audit Report, dated February 4, 2016;
 - POS Training Manual, dated December 2015; and,
 - POS locations and volume of cash transactions.
- Obtain and understand policies, procedures, processes and existing controls by interviewing personnel involved in cash handling at the following locations:
 - Markham Civic Centre, including the:
 - Cash Management Office;
 - Planning Department;
 - Building Department; and,
 - Legislative Services Department, including the Contact Centre.
 - Angus Glen Community Centre and Library, including the:
 - Main Office;

² Due to the timing of this engagement coinciding with the City's commencement of the procurement process of a new Program Administration Facility Booking System ("PAFBS") and Point of Sale ("POS") system (which will integrate PCI standards), MNP has provided PCI guidance and advice in other documents, as follows:

- Comments related to our review of the PAFBS and POS Request for Proposal; and,
- Roadmap, including checklists and guidance, related to the evaluation of proposed system vendors and implementation of the new systems, to ensure PCI standards are integrated and maintained.

- Library;
 - Aquatics Office; and,
 - Tennis Centre.
- Milliken Mills Community Centre and Library, including the:
 - Main Office;
 - Library; and,
 - Aquatics Office.
- Operations Department at 555 Miller Avenue.
- Review of cash deposit and process documentation to determine compliance against the policies, procedures, processes and controls for a representative sample of the City locations listed above;
- Documentation of conclusions and recommendations for improvement of identified internal control gaps and/or weaknesses; and,
- Conduct a meeting with City personnel to obtain an understanding of the City's current and planned developments with respect to PCI compliance standards.

The following areas were not within the scope of this audit:

- Processes and procedures related to the Program Administration Facility Booking System (i.e. CLASS) and TixHub registration system (which is used at the Theatre), petty cash and establishment of cash floats;
- Powerstream utility payment process given that the City only acts as an agent for these payments;
- Processes or procedures for identifying counterfeit currency;
- Compliance with anti-money laundering ("AML") legislation such as FINTRAC; and,
- The information technology general controls ("ITGCs") over databases and systems leveraged for cash handling.

RISKS

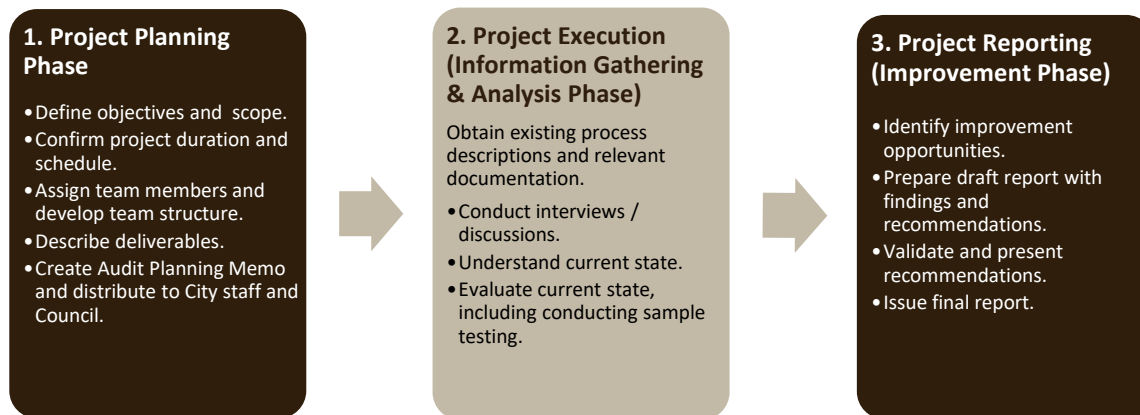
Given the stated objective, the following inherent risks were considered during the audit, which given the scope of audit, are typical risks to be considered in an audit of this nature to facilitate the planning of audit procedures:

- Cash may not be securely accepted, handled, transported and completely deposited;
- Cash may not be counted and independently verified;
- Cash transactions may not be adequately initiated, authorized, processed, recorded and reported;
- The following incompatible duties may not be adequately segregated:
 - Receiving/handling and counting of cash;
 - Reconciliation or confirmation of cash to statements/reconciliations from third parties;
 - Depositing of cash;
 - Recording of cash; and,

- Performing of bank reconciliations.
- Receipts are not recorded or are inaccurately recorded;
- Invalid receipts are recorded;
- Receipts are recorded in the wrong amount, account or period due to fraud or error; and,
- Cash is deposited in incorrect or unauthorized bank accounts, or accounts not owned by the City.

APPROACH

In accordance with MNP methodology, the work plan for the cash handling audit included the following:



AUDIT TEAM

The audit was carried out by the following MNP team:

Geoff Rodrigues, Audit Lead	Provided expertise in audit methodology and directed the MNP team in all stages of the audit.
Scott Crowley, Quality Assurance Partner	Performed quality assurance review over entire audit process including planning, execution and reporting.
Veronica Bila, Audit Manager	Managed all aspects of the engagement and reviewed audit results.
Myuran Raventhiran, Senior Auditor	Planned and carried out the audit, involving the above resources as needed.
Sunny Jamwal PCI DSS Specialist	Provided specific knowledge and insight on Payment Card Industry Data Security Standards for the new Point of Sale system procurement.

STRENGTHS

In conducting the audit, MNP noted a number of strengths with respect to how the City handles and safeguards cash. The City mitigates cash handling risks with controls over segregation of duties, reconciliation processes, and physical access controls, along with other types of manual and automated controls. The following key strengths are described:

Segregation of Duties

The City's Cash Management Office and the locations handling cash have established robust segregation of duties in the cash handling process. We have highlighted some particular areas below showcasing segregation of duties:

- Individuals who re-count cash, re-verify transaction records/receipts, and prepare deposits are different than individuals who record the transactions in the POS and complete the first cash count; and,
- Individuals who monitor bank balances and conduct audits are not involved with recording or handling day-to-day POS transactions and deposits.

Safeguarding of Cash

Each location maintains at least one safe (with many locations having two or three safes in different areas) that are used to hold cash, change boxes, POS cash tills, deposit amounts, and transaction records/receipts. Safes have adequate locking mechanisms (i.e. pin-pads and combination locks) and are utilized. In addition, keys to change boxes are kept in locked cabinets. Deposit slips and bags are also tracked, monitored, and safeguarded in cabinets and manager offices.

Surprise Audits

The City's Cash Management Office conducts surprise audits, on every location which handles payments, twice per year. The audits include verifying cash tills, change boxes and petty cash balances to the amounts allocated and recorded by the Cash Management Office. A report is completed and provided to the Treasurer describing any discrepancies found during the audit, attributing it back to the location. Past audits have found minimal discrepancies.

Refunds

Refunds are not permitted to be processed at locations which take payments and handle cash. If a customer requires a refund, it must be submitted and processed through the Finance Department, following the cheque payment cycle and policies. This reduces the types of errors and discrepancies that can occur at a cash handling location.

SUMMARY OF OBSERVATIONS

To enable the City to set priorities in their action plans, we have reported our observations in one of three categories, “**Low**”, “**Medium**” or “**High**” based on our assessment of the priority (i.e. significance, complexity, and resources required) of each observation.

Rating	Rating Description
L = Low	The observation is not critical but should be addressed in the longer term to either improve internal controls or efficiency of the process (i.e. 6 to 12 months).
M = Medium	The observation should be addressed in the short to intermediate term to either improve internal controls or efficiency of the process (i.e. 3 to 6 months).
H = High	The observation should be given immediate attention due to the existence of either a potentially significant internal control weakness or operational improvement opportunity (i.e. 0 to 3 months).

The chart below provides a summary of our observations, based on the rating scale outlined above. Detailed observations and recommendations can be found in **Appendix A**.

OBSERVATION	RATING			REF.
	L	M	H	
Cash Handling Policies and Procedural Documentation – Cash handling process and procedures documentation varies between the City’s locations. In addition, the City does not have a Cash Handling Policy or a Change Float Policy.				1
Point of Sale (POS) System Controls – While the POS system has adequate controls to mitigate significant risks around cash handling, we found instances where unique IDs are not being used to process transactions, and cash tills opening for non-cash transactions.				2
Access to and Location of Safes – While each location maintains and uses a safe to safeguard cash, we found instances where safes are kept in areas with high visibility by internal staff, and an instance where the safe is accessed by non-senior personnel.				3
Inconsistent Application of Cash Handling Procedures – While most locations apply cash handling procedures, there are three locations where we found that second-person verification and daily documentation procedures are not consistently followed.				4

Security Camera Placement – Placement of cameras should be assessed on a regular basis.				5
Reporting of Suspected Waste, Fraud or Wrongdoing – While there were no identified concerns regarding the reporting of and instances of fraud, the City should consider the establishment of a whistleblower hotline available for City staff or members of the public to report instances of wrongdoing.				6

ACKNOWLEDGEMENT

We would like to express our appreciation for the cooperation and efforts made by City staff whose contributions assisted in ensuring a successful engagement. City staff provided the Auditor General with unrestricted access to all activities, records, systems, and staff necessary to conduct this audit freely and objectively.

APPENDIX A: DETAILED OBSERVATIONS AND RECOMMENDATIONS

#	Observation	Rating	Recommendation	Management Response
1	<p>Cash Handling Policies and Procedural Documentation</p> <p>Cash handling process and procedures documentation varies between the City's locations. For example, the Cash Management Office has prepared process maps; Recreation has a procedural manual; the Library has its own policy and procedures; and, Operations does not have fully documented procedures.</p> <p>In addition, the City does not have a Cash Handling Policy or a Change Float Policy, to provide all departments and locations guidance and consistency on proper cash handling and security controls and protocols.</p> <p><i>While a standard set of policies and procedures are important and would normally be rated as a medium priority, the current practices and controls that are in place are working effectively. The new Program Administration Facility Booking System and POS will be purchased and implemented. This observation has been rated low in order for management to develop, update and roll-out policies, processes and procedures at all locations,</i></p>	L	<p>To ensure consistent application of all City policies and procedures, management should prepare the following:</p> <ul style="list-style-type: none"> • Cash Handling Policy; • Cash Handling Process and Procedures Manual; and, • Change Float Policy and Procedures. <p>Areas that should be covered within the policies and procedures manual include:</p> <ul style="list-style-type: none"> • Roles and responsibilities of each level of staff for the key times during each business day (i.e. location opening, location closing, during a shift); • Steps to follow to count cash, reconcile and prepare deposits; • Steps and documentation required for obtaining change from the change box/float; • Security controls, such as lock-boxes and safes; • Protocols and thresholds for communicating and reporting of errors/discrepancies; • Protocols on accepting large cash transactions and 	<p>Management supports the Auditor General's recommendation.</p> <p>The City will develop a Corporate Cash Handling Policy in conjunction with the implementation of the new Program Administration Facility Booking System that will incorporate all items identified by the Auditor General. The Policy will promote proper and consistent cash handling practices across the organization and will ensure that cash and cash equivalents are physically safeguarded.</p> <p>The Corporate Cash Handling Policy will leverage existing departmental cash handling documentation and process maps and will include the identification of roles, responsibilities, and control standards for:</p> <ul style="list-style-type: none"> • Cash Handling Procedures; • Change Float Procedures; and, • Cash System Manual. <p>The City will continue to review and update policies and procedures every five years unless changes necessitate earlier updates.</p> <p>Timeline to Implement: Q3 2018</p>

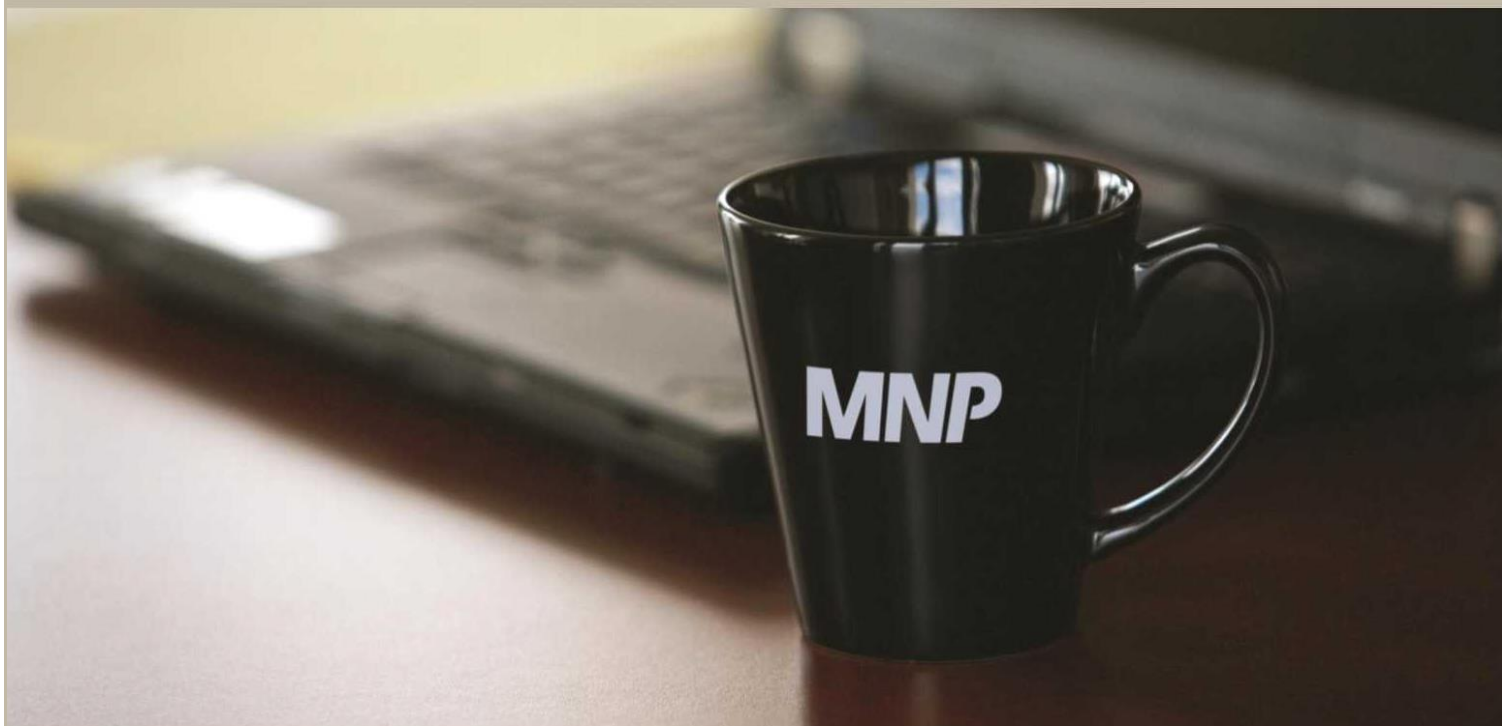
	<i>in conjunction with the timing of the roll out of the new system.</i>		<p>thresholds/documentation required for cash pick-up; and,</p> <ul style="list-style-type: none"> • Protocols on manual or non-POS transactions. <p>The procedures manual should be in sufficient detail to facilitate staff training and provide guidance over standard operating procedures outlining roles and responsibilities around key tasks.</p> <p>Management should leverage the existing process maps and procedures documentation to further develop formal and consistent protocols and procedures for all City locations that handle cash.</p> <p>The updated policies and process documentation should be reviewed and updated on a periodic basis by City staff and the executive leadership team, following the City's established policy review protocol in order to ensure continued accuracy, relevance and completeness of procedures performed by City staff at cash locations.</p>	
2	<p>Point of Sale (POS) System Controls</p> <p><u>Log-in ID</u> In order to enter transactions within the POS system, a staff member is required to use their individual log-in ID into the POS terminal.</p>	L	<p>Management should ensure that each staff uses their own unique log-in ID to process transactions. In addition, each POS terminal should have a short time-out window (i.e. five minutes or less) so that the system can automatically log-out staff.</p>	<p>Management supports the Auditor General's recommendation.</p> <p>Timeline to Implement: Completed</p>

	<p>During our interview with the Contact Centre desk we were informed that staff did not log out of their individual log-in ID after each transaction. Since there are multiple staff who can be on shift on any day, only one person's log-in ID is used to conduct all of a day's transactions. This circumvents the system's security controls and tracking of user access. We further understand that the terminal's time-out window is approximately 20 minutes and due to the frequent nature of transactions, the terminal would not have the opportunity to automatically log-out staff.</p> <p>Cash Till</p> <p>We also found that POS system cash tills at several of the City's locations currently open when processing non-cash transactions, such as debit or credit card payments, increasing the risk of the misappropriation of cash.</p>		<p>Management should ensure that all City POS system cash tills are programmed so that they do not open for non-cash transactions.</p>	<p>Management supports the Auditor General's recommendation.</p> <p>Timeline to Implement: Completed</p>
3	<p>Access to and Location of Safes</p> <p>Over the course of the audit, we noted that safes at two locations are kept in areas with relatively high visibility by internal staff or are accessed by non-senior personnel.</p> <p>In addition, we noted that at one location, the cash till is not locked within the safe overnight.</p>	L	<p>Management should ensure that cash safes are physically maintained in locations with reduced visibility and accessible only to individuals requiring access.</p> <p>All cash tills should be stored in a safe when not in use.</p> <p>Permitted access to safes should be restricted to senior level positions, if possible. The number of non-senior level</p>	<p>Management supports the intent of the Auditor General's recommendation.</p> <p>Management will undertake a review of all safe locations to address the Auditor General's recommendation.</p> <p>Details will be provided in the Confidential Report pertaining to the Cash Handling Audit.</p> <p>Timeline to Implement: Q2 2017</p>

			individuals having access to a safe should be kept to a minimum.	
4	<p>Inconsistent Application of Cash Handling Procedures</p> <p>We found that certain cash handling procedures are not being consistently applied for the following locations:</p> <p><u>Angus Glen Community Centre – Public Skating</u></p> <p>Only one staff member is present during manual cash collection for public skating. This staff also counts cash received and enters it into the POS terminal at the main desk on the same day. There is no second person verifier of the amount collected and entered into the system.</p> <p><u>Angus Glen Community Centre – Tennis Centre</u></p> <p>At the Tennis Centre, on a daily basis, the closing staff member places all cash deposit amounts within the safe, however does not complete and document a detailed review and cash count. The detailed review and cash count is completed on a weekly basis for preparation of the cash deposit.</p>	L	<p>Management should ensure that at least two individuals be present throughout cash counting and verification processes for public skating.</p> <p>In addition, all cash counts, cash pick-ups and reconciliation procedures performed should be documented on a daily basis and have a second person verifier sign-off.</p>	<p>Management supports the Auditor General's recommendations.</p> <p><u>Angus Glen Community Centre - Public Skating</u></p> <p>Management will ensure that two staff members are present during the cash counting and verification processes for public skating.</p> <p>All cash counts, cash pick-ups and reconciliation procedures performed will be documented on a daily basis and have a second person verifier sign-off.</p> <p>Timeline to Implement: Completed</p> <p>Management will deploy a POS terminal in the Angus Glen Arena.</p> <p>Timeline to Implement: Q2 2017</p> <p><u>Angus Glen Community Centre - Tennis Centre</u></p> <p>Management will ensure that two staff members are present during the cash counting and verification processes for the Tennis Centre.</p> <p>All cash counts, cash pick-ups and reconciliation procedures performed will</p>

	<p><u>Milne Park</u> At the end of the day, the Group Leader performs the cash count and prepares the deposit information; however, there is no second person verifier count or sign-off documented.</p> <p>In addition, any cash pick-ups that were done during the day are not documented.</p> <p><u>Operations</u> At the end of each day, the Supervisor reviews the daily transactions and performs the cash count; however, these procedures are not documented nor is there a second person verification count performed and documented.</p>		<p>be documented on a daily basis and have a second person verifier sign-off.</p> <p>Timeline to Implement: Completed</p> <p><u>Milne Park</u> Management will ensure that two staff members are present during the cash counting and verification process.</p> <p>All cash counts, cash pick-ups and reconciliation procedures performed will be documented on a daily basis and have a second person verifier sign-off.</p> <p>Timeline to Implement: Procedures are in place and will be implemented in Q2 2017, which aligns with park opening.</p> <p><u>Operations</u> Management will ensure that two staff members will be present during the cash counting and verification process.</p> <p>All cash counts, cash pick-ups and reconciliation procedures performed will be documented on a daily basis and have a second person verifier sign-off.</p> <p>Timeline to Implement: Completed</p>
5	<p>Security Camera Placement</p> <p>Each City location accepting payments has a number of security cameras recording the surrounding area.</p>	L	<p>Management should assess security cameras for optimal placement (i.e. unobstructed view with maximum coverage) on a regular basis.</p> <p>Management supports the Auditor General's recommendation.</p>

				<p>Management will review security camera placement and report back to senior management on action required.</p> <p>Timeline to Implement: Q4 2017</p>
6	<p>Reporting of Suspected Waste, Fraud, or Wrongdoing</p> <p>City staff wishing to report instances of suspected waste, fraud, or wrongdoing ("whistleblowers") are currently directed to inform either:</p> <ol style="list-style-type: none"> The direct superior of the individual(s) in question; or, The Human Resources ("HR") Department. <p>There is no dedicated waste, fraud, and wrongdoing hotline available for City staff or members of the public.</p> <p>While we did not identify any concerns or instances surrounding waste, fraud, or wrongdoing, a whistleblower hotline is a best practice for public transparency.</p> <p>Reporting instances of waste, fraud or wrongdoing to an individual's direct superior can be an adequately effective channel for staff to communicate most issues; however, is not appropriate if the individual's superior is the one suspected of committing the wrongdoing. Furthermore, the HR Department may not be equipped to handle complaints relating to fraud which are typically received by those trained to deal with fraud related matters.</p>	L	<p>A dedicated whistleblower hotline can add value to the City's control environment by:</p> <ol style="list-style-type: none"> Providing whistleblowers with a source of advice and an opportunity to report issues to an individual completely independent of management or HR. Provide an additional channel for members of the public to report potential issues they have experienced/seen. Increase the level of transparency and accountability at the City. <p>Protocols for the use of the whistleblower hotline should be included within the City's Cash Handling Policies and Procedures.</p>	<p>Management will assess the need for the whistleblower hotline in the context of the overall risk profile and accountability and transparency framework within the City.</p> <p>Timeline to Implement: Q4 2017</p>



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