



Gwa'sala-'Nakwaxda'xw School  
PO Box 1799, 182 Ba'as Road  
Port Hardy, BC V0N 2P0  
Phone (250) 949-7743 Fax (250) 949-7422  
Website: [www.gnschool.ca](http://www.gnschool.ca)



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## CASH PAYMENT POLICY

### RATIONALE

The purpose of this policy is to mitigate the risks associated with accepting cash as payment for tuition and other related fees, goods, and services. This policy is part of the standard required independent school policies and will be reviewed during the Ministry of Education's regular independent school inspection processes. The School is committed to detecting and preventing any money laundering activities and to ensuring that it does not become involved in any arrangements involving criminal or terrorist property.

In order to fulfil this commitment, the School has established procedures for assessing the risk of financial crime, for internal reporting of suspicious activities and for making suspicious transaction reports to the relevant agencies if necessary.

### Key Principle

The School will ensure that adequate cash handling and record keeping practices are followed. Where risk factors are identified, the School will ensure that the identities of parents, guardians or other persons making any substantial cash payment to the School are satisfactorily verified.

### POLICY

1. The School will accept the following payment types for school photos, school merchandise, field trip costs, incidental charges and donations:
  - cash
  - cheque
  - pre-authorized payment
  - Email Money Transfer (EMT)
  - money order or bank draft
  - online banking payment
2. The School will accept payment from all banks and credit unions incorporated, formed, or authorized under the Bank Act of Canada that meet Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) and Proceeds of Crime (Money Laundering) and Terrorist Financing Act requirements (PCMLTFA):
  - Schedule I banks (domestic);

- Schedule II (subsidiaries of foreign banks); and
- Credit unions incorporated under the British Columbia Credit Union Incorporation Act.

1. **Receiving Cash Payments.** Occasionally, cash may be collected by the School.. Such cash collected by students and through the office administrator will be verified by teacher or administration and forwarded to the Finance Department for timely bank deposit. Such amounts collected typically total less than \$2,000. If any employee is offered funds that he or she knows or suspects are criminal property or may represent terrorist finance, or if he or she receives any unusual request to receive or transfer money, it will be reported immediately, in accordance with the Reporting section of this Policy, to the Director, Finance (the "Reporting Officer") who will, if appropriate, contact FINTRAC, police or other relevant agency.
5. **Cash Handling.** The School will establish responsibility and describe the minimum requirements for cash handling. The following procedures will be followed by employees when handling cash, including processing student led fundraising events and petty cash reimbursements:
  - Cash will be stored in a locked and secure location until the funds are deposited.
  - Cash should be deposited on a daily basis. Where this is not possible and providing amounts are minimal, funds will not be held for longer than one week.
  - Collection of cash, deposit preparation, and reconciliation duties will be performed by separate individuals to the extent possible, to ensure the safeguarding of cash. At minimum, deposit preparation and reconciliations are to be completed by separate individuals.
  - Cash receipts will be reviewed and reconciled to ledger accounts on a timely basis to ensure they have been correctly recorded. Accounting adjustments to ledgers will also be made on a timely basis.
  - Cash shortages or other discrepancies should be reported immediately to the Controller or Director, Finance.
6. **Refund procedures.** Refunds will be made to the original form of payment unless otherwise approved by the Principal. All requests for a refund in cash following a payment by credit card, wire transfer, cheque, etc., will be reported to the Reporting Officer.
2. **Suspicious Transactions.** Employees will evaluate the source of funds that are paid to the School and be alert to unusual patterns of behaviour or activities that may indicate the possibility of money laundering or other terrorist financial crimes. It is not possible to produce an exhaustive list of the matters that might give rise to a suspicion of money laundering or other terrorist financial crime. It is therefore important that employees use their own judgment when looking at any business relationship or transaction. Facts, context and money laundering/terrorist financing indicators need to be assessed to determine whether there are reasonable grounds to suspect that the transaction is related to the commission or attempted commission of a money laundering/terrorist financing offence.

The following are some possible money laundering/terrorist financing indicators:

- **Transactions:** The parent, guardian or payer engages in multiple transactions conducted below the reporting threshold within a short time period, makes inquiries that would indicate a desire to avoid reporting, or exhibits knowledge of reporting thresholds.

- Structures: Payments involving complex or illogical arrangements that make it unclear who is making the payment or appear to be structured to avoid identification or reporting thresholds.
- Third parties: Payment of school fees or involvement by companies, trusts, off-shore entities or other third parties with no obvious relationship to student. The parent, guardian or payer appears to be collaborating with others to avoid client identification or reporting thresholds.
- Behaviour: The parent, guardian or payer seems unusually anxious to complete a transaction, is unable to justify why they need to make a payment quickly, requests a cancellation, reversal or refunds of earlier transaction or makes overpayment for no good reason.
- Documents: Information or documentation is withheld by the parent, guardian or their representative or appears falsified.

3. Reporting. Employees of the School will make a report to the Reporting Officer (Principal), as soon as reasonably possible, where they have knowledge or suspicion, or where there are reasonable grounds for having knowledge or suspicion, that another person is engaged in money laundering, or that terrorist property exists ("Suspicious Transaction Report").

Your report should include as much detail as possible including:

- Full available details of the people, and organizations involved including yourself and other members of staff if relevant.
- Full details of transaction and nature of each person's involvement in the transaction.
- Suspected type of money laundering activity or use of proceeds of crime with reasons for your suspicion.
- The dates of any transactions, where they were undertaken, how they were undertaken, and the likely amount of money or assets involved.
- Information on any investigation undertaken to date, including whether the suspicions have been discussed with anyone and if so on what basis.
- Whether any aspect of the transaction(s) is outstanding and requires action to progress.
- Any other information that may help the Reporting Officer judge the case for knowledge or suspicion of money laundering and to facilitate any external report.

Once you have reported your suspicions to the Reporting Officer, you will follow any instructions provided. You will not make any further enquiries unless instructed to do so by the Reporting Officer. Any further transactions or activity in respect of the person in question, whether or not it is related to the matter that gave rise to the original suspicion, should be reported to the Reporting Officer as they happen, unless and until the Reporting Officer has confirmed that no report to the FINTRAC is to be made

The Reporting Officer will consider all Suspicious Transaction Reports and will make an external report to the FINTRAC (who will undertake any necessary investigation) as soon as is practicable if he/she considers that there is knowledge, suspicion or reasonable grounds for knowledge or suspicion, that another person is engaged in money laundering, or that terrorist property exists, even if no transaction takes place ("FINTRAC Report"). All FINTRAC Reports will comply with FINTRAC reporting requirements.

1. Record Keeping Practices. All Suspicious Transaction Reports will be documented, either on paper or electronically. All enquiries that are made within the School in relation to any Suspicious

Transaction Report should also be recorded. The School will keep details of actions taken in respect of Suspicious Transaction Reports, including details of information considered by the Reporting Officer in respect of a Suspicious Transaction Report where no external FINTRAC report is made. The School will also keep a copy of any FINTRAC Reports and associated evidence and documentation.

All information, evidence and reports with respect to Suspicious Transaction Reports, FINTRAC Reports, and identification and verification of individuals will be kept by the School for a minimum of five years.

1. Review

This Policy will be reviewed and updated as needed, annually at a minimum.