Administrative Procedure

Handling of City Money

This procedure falls under Administrative Directive: Financial Administration and Control A1206

Date of Creation: December 11, 2015

Next Scheduled Review: December 11, 2018

Purpose:

The purpose of this procedure is to outline the guidelines that must be followed throughout the City of Edmonton when handling City Money (excluding Imprest Funds) and Credit Card Data.

Scope:

This procedure applies to all City of Edmonton full-time, part-time, permanent, temporary, provisional and contract employees:

a. involved in the handling of City Money (excluding Imprest Funds) and/or Credit Card Data;

b. who could impact the security of the Cardholder Data Environment of the City of Edmonton in all City departments, boards and authorities, and the Edmonton Police Service.

Details:

Definitions

Cash - Canadian and US bills and coins.

Cash-like Product - a product having a retail value that is redeemable for goods or services either externally (for example, movie passes) or internally (for example, transit passes).

Cash Site - a City location that handles City Money. Custodians of Imprest Funds that cover floats, petty cash and program cash are excluded from the definition of a Cash Site.

Cardholder Data Environment (CDE) - the people, processes and technology of the City that store, process or transmit Cardholder Data or Sensitive Authentication Data, including any connected system components.

Credit Card Data - the following credit card information, either on paper or in electronic form, obtained or processed by the City as a Merchant:

<table>
<thead>
<tr>
<th>Cardholder Data</th>
<th>Primary Account Number (PAN)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Cardholder Name</td>
</tr>
<tr>
<td></td>
<td>Expiration Date</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Sensitive Authentication Data</th>
<th>Full Magnetic Stripe Data</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Card Verification Value (CVV)</td>
</tr>
<tr>
<td></td>
<td>Personal Identification Number (PIN)</td>
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</table>
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Cheque (Personal or Business) - Personal or business cheque written on a personal or business bank account.

Money - Cash, Cheques, money orders, debit and credit card transactions, bonds, letters of credit, and any other media. It also includes any Cash-like Products.

Police Information Check
Police Information Check (requiring a Vulnerable Sector Search) - Contains the following disclosures:

- A list of all criminal convictions obtained from the Canadian Police Information Centre (CPIC).
- A list of all pending court appearances, criminal convictions and/or other relevant convictions not yet recorded on a criminal record and any court imposed orders. This information is obtained from the Province of Alberta's justice database known as the Justice Online Information Network (JOIN).
- A list of non-conviction locally held police records that demonstrate a pattern of behaviour representing a risk to public safety.

Police Information Check (Not Requiring a Vulnerable Sector Search) - Contains the following disclosures:

- A list of all criminal convictions obtained from the Canadian Police Information Centre (CPIC).
- A list of all pending court appearances, criminal convictions not yet recorded on a criminal record and any court imposed orders. This information is obtained from the Province of Alberta's justice database known as the Justice Online Information Network (JOIN).

Guidelines/ Processes:

All Money belonging to the City must be properly secured, and all Cash, Cheques and money orders must be deposited to the City's bank accounts in a timely manner.

The value of Cash-like Products for purposes of assessing risk and determining storage requirements will be their retail value.

Money must be stored in accordance with the standards for Money containers, safes and vaults established by Corporate Security. Variations from these standards may be permitted if approved by the Director, Treasury Management, in consultation with Corporate Security.

City vaults and safes must not store funds belonging to outside organizations, patrons or staff.
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The handling of Credit Card Data must comply with the Payment Card Industry Data Security Standard (PCI DSS) to protect the highly sensitive Credit Card Data from unauthorized access, collection, use, and disclosure.

All City of Edmonton employees, processes, and technologies that, a. process, store, or transmit Credit Card Data within the City of Edmonton, b. could impact the security of the Cardholder Data Environment of the City of Edmonton, must comply with the associated procedures as well as all applicable requirements of the PCI DSS.

Cash-like Product issued by the City must be serialized and perpetual inventory records must be maintained in accordance with the Corporate Records and Information Management Directive A1410C, as amended.

Establishment of City bank accounts, arrangements for electronic banking/payment services, and all communications with the City's preferred bank/banks will be the responsibility of the Director, Treasury Management.

Any purchases, leases, replacements or upgrades to Money handling equipment, Cash register hardware and/or software, and modifications to existing or construction of new money handling or cashiering facilities, must be approved by the Director, Treasury Management.

All new cashiering systems and payment systems (including web-based systems) must be approved by the Director, Treasury Management to ensure that they conform to existing standards and can interface with the Corporate Cash System.

Employment reference checks, with specific questioning about the candidate’s previous Money handling duties and responsibilities, as well as a Police Information Check, will be required for all candidates being considered for positions involving the routine handling of City Money.

Periodically throughout their term of employment, employees responsible for handling Money may be required to provide an updated Police Information Check.

Employees responsible for handling Money will be trained by their supervisors and will be required to sign an acknowledgement form indicating their agreement to comply with the Handling of City Money Directive and Procedure.

Cash must never be transferred internally by interoffice mail.

Any unusual or recurring shortages must be reported immediately to Corporate Security and/or the Office of the City Auditor, in accordance with the Fraud Directive A1454 and Whistleblower Protection Directive A1455.

Detailed, standard procedures for the handling of City Money are developed and maintained by Treasury Management. These procedures should be used by all Cash Sites unless they have detailed, department-specific
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Money handling instructions that have been jointly signed by operations management at a Director level or higher and the Director, Treasury Management.

When requested, the Director, Treasury Management will provide detailed, site specific Money handling instructions for operating areas requiring them. These will be signed off by operations management at a Director level or higher and the Director, Treasury Management. When operational changes affect the money handling instructions, operating areas should update the Site Specific procedures and forward them to the Director, Treasury Management for review and approval.

Responsibilities:

The Director, Treasury Management and/or the Office of the City Auditor may conduct audits, reviews, or tests at any time without notice to assess compliance with this Administrative Directive and associated procedures.

Corporate Security may conduct security audits of Cash Sites and investigate security breaches as required.

The Director, Treasury Management must approve in writing any revisions or exceptions to this Administrative Directive and associated procedures.

Employees are responsible for reporting any suspected violation of this Administrative Directive and associated procedures to the Director, Treasury Management and/or the Office of the City Auditor. Employees wishing to report anonymously may use the Fraud and Misconduct Hotline (by phone at 1-866-889-8297 or by Internet at http://www.clearviewconnects.com/).

Disciplinary action may be taken in cases of non-compliance, and such cases will be dealt with in accordance with Discipline of City Employees Directive A1102, as amended.

Attachments: N/A