

Board Policy 4008

SEGREGATION OF DUTIES AND SIGNING AUTHORITY

Legal References: Broader Public Sector Accountability Act (2010)

Related References: Broader Public Sector (BPS) Procurement Directive, Ministry of Finance

Board Policy 4005 - Procurement Board Policy 4018 - Fraud Management

Administrative Procedure 4360 - Principles of Business Conduct

For Board Employees

Administrative Procedure 4315 - Fraud Management

Administrative Procedure 4380 - Travel, Meals and Hospitality Expenditures

Administrative Procedure 4400 - One-Over-One Approvals

Administrative Procedure 4570 - Procurement

Effective Date: November 29, 2010

Revisions: February 12, 2018, February 8, 2021

Reviewed:

1.0 Preamble

1.1 Segregation of duties and the delegation of authority are essential controls within the procure-to-pay process. Together, they ensure process integrity by reducing exposure to inappropriate, unauthorized or unlawful expenditures.

2.0 Segregation of Duties

- 2.1 Segregation of duties prevents any one person from controlling the entire procure-to-pay process by segregating approvals for the key stages of the process.
- 2.2 The Waterloo Region District School Board (WRDSB) will segregate a minimum of three (3) of the following five (5) functions:

Function	Responsibility	Accountable Party
Requisitioning	Authorize procurement services to place an order	Requisitioner
Requisition Approval	Authorize that funding is available to cover the cost of the requested order, and that the requested items/services are required	Budget Holder
Purchase Order	Authorize release of the order to the vendor under agreed terms	Procurement Services
Receiving	Authorize that the order was physically received, correct and complete	Individual Receiving The Goods/Services
Payment	Authorize release of payment to the vendor	Accounts Payable

3.0 Approval Authority Schedule (AAS)

The following tables identify the approvals required for various levels of operating and capital Procurement activities. These authority levels shall be adhered to by all WRDSB personnel.

All amounts noted are exclusive of tax.

3.1 Contract Signing Authority

All contracts, letters of intent or agreements shall be reviewed and signed by authorized signatories of the WRDSB only. These roles include the Director of Education, the Coordinating Superintendent, Business Services & Treasurer of the Board, or the Manager of Procurement Services.

In circumstances where a contract is required for a **one-time event**, such as reserving a banquet hall for graduation, or booking a guest speaker, an exception exists whereby the Superintendent, Principal or Manager may sign the contract; to a maximum of \$10,000. No other staff may commit to any contractual agreement.

3.2 Requisition Approval Authority Schedule

Total Purchase Amount	Delegated Authority level		
Less than or equal to \$50,000	Principal/Manager		
Less than or equal to \$100,000	Associate Director, Coordinating Superintendent HRS, Superintendents, Controllers, Senior Managers		
Greater than \$100,000	Coordinating Superintendent, Business Services & Treasurer of the Board, or Director of Education		
EXCEPTIONS:			
Less than or equal to \$1,000,000 Computer Hardware & Software	Superintendent, Student Achievement & Well-Being (with IT portfolio)		
Less than or equal to \$1,000,000 Facilities Maintenance & Construction Projects	Manager of Capital Projects		
Greater than \$1,000,000 Facilities Maintenance & Construction Projects	Controller, Facility Services		

Note: The exceptions identified in 3.2 exist to ensure consistency with established WRDSB technology and building standards, as well as compliance with all existing contracts. The exceptions listed relate to requisition approval only.

3.3 Commitment Approval Authority Schedule

Total Purchase Amount	Delegated Authority level
Less than or equal to \$3,000	Principal/Manager (May include purchases, Request for Cheque or Procurement Cards)
Greater than \$3,000 and less than or equal to \$50,000	Procurement Specialist, Junior Buyer, Project Coordinator
Greater than \$50,000 and less than or equal to \$100,000	Senior Procurement Specialist
Greater than \$100,000 and less than or equal to \$1,000,000	Manager of Procurement Services
Greater than \$1,000,000	Two approvals required: Manager of Procurement Services and/or Controller, Financial Services and/or Coordinating Superintendent, Business Services & Treasurer of the Board

3.4 Receipt Approval Authority Schedule

Total Purchase Amount	Delegated Authority level			
Less than \$10,000	The WRDSB utilizes "positive receiving" for smaller value purchase orders. The Requisitioner/Budget Holder is accountable for ensuring all items ordered and charged to their budget have been received in good order. Any exceptions shall be immediately reported to finance-ap@wrdsb.ca.			
Greater than or equal to \$10,000	Principal/Manager			
EXCEPTIONS:				
Less than or equal to \$100,000 for Construction Projects	Facility Services Project Coordinators			
Greater than \$100,000 and less than or equal to \$1,000,000 Facilities Maintenance & Construction Projects	Manager of Capital Projects			
Greater than \$1,000,000 Facilities Maintenance & Construction Projects	Controller, Facility Services			

3.5 Payment Approval Authority Schedule

Total Purchase Amount	Delegated Authority level		
PAYMENTS WITH MATCHING PURCHASE ORDER			
Less than or equal to \$10,000	Accounts Payable Clerk		
Greater than \$10,000 and less than or equal to \$50,000	Accounting Officer		
Greater than \$50,000 and less than or equal to \$100,000	Manager of Accounting Services		
Greater than \$100,000	Controller, Financial Services		
PAYMENTS WITH NO PURCHASE ORDER			
Invoice Must Include Requisition Level Approval Signature			
Less than or equal to \$3,000	Accounts Payable Clerk		
Greater than \$3,000 and less than or equal to \$10,000	Accounting Officer		
Greater than \$10,000 and less than or equal to \$50,000	Manager of Accounting Services		
Greater than \$50,000	Controller, Financial Services		
EXPENSE REIMBURSEMENTS			
Less than or equal to \$1,000	Associate Director, Coordinating Superintendent HRS, Superintendents, Controller, Principal, Vice-Principal, Manager, and Supervisor		
Greater than \$1,000 and less than or equal to \$3,000	Coordinating Superintendent, Business Services & Treasurer of the Board		
Greater than \$3,000	Director of Education		

Note: All Capital Payments require additional approval by the Budget Officer responsible prior to payment.

4.0 Monthly Report to Chairperson of the Board

On a monthly basis, the Coordinating Superintendent, Business Services & Treasurer of the Board will prepare and submit a report to the Chairperson of the Board listing all disbursements over \$50,000.