Community Living Toronto

Navigating Individual Banking with CLTO:

Policies, Challenges & Solutions

OBRC Conference 2025

November 21, 2025

Agenda

- Disclaimer
- Banking Challenges for Individuals
- Supportive Banking Process
- Setting up the bank account for the individuals we support
- Day-to-day spending and approval process
- CLTO Policy - Management of Finances for People Supported
- Ongoing Internal Control Improvements
- Our Recommendations
- Questions and Comments

Disclaimer

This presentation is intended for informational purposes only and reflects current practices, policies, and recommendations related to individualized banking within our organization. It does not constitute legal, financial, or regulatory advice.

Attendees are encouraged to consult with appropriate professionals, banks or governing bodies for guidance specific to their roles or jurisdictions.

The content presented, including references to the banking agreements, CLTO Policy and internal control procedures, is based on our understanding as of the date of this presentation and may be subject to change. Any examples or scenarios discussed are illustrative and should not be interpreted as prescriptive or exhaustive.

We welcome questions and comments, but please note that responses provided during this session are general in nature and may not address all individual circumstances.

CLTO – Banking Challenges for Individuals

01 Opening individuals' bank accounts (non-verbal, stress/fear etc.)

02 Joint accounts with staff members

03 Joint accounts with family members

04 Policies differing between banks

05 Working with Public Guardians and Trustees

06 Individuals sharing PINs with staff members

07 Growing need to have debit cards, credit cards, or virtual visa cards

08 Fraud

Supportive Banking Process

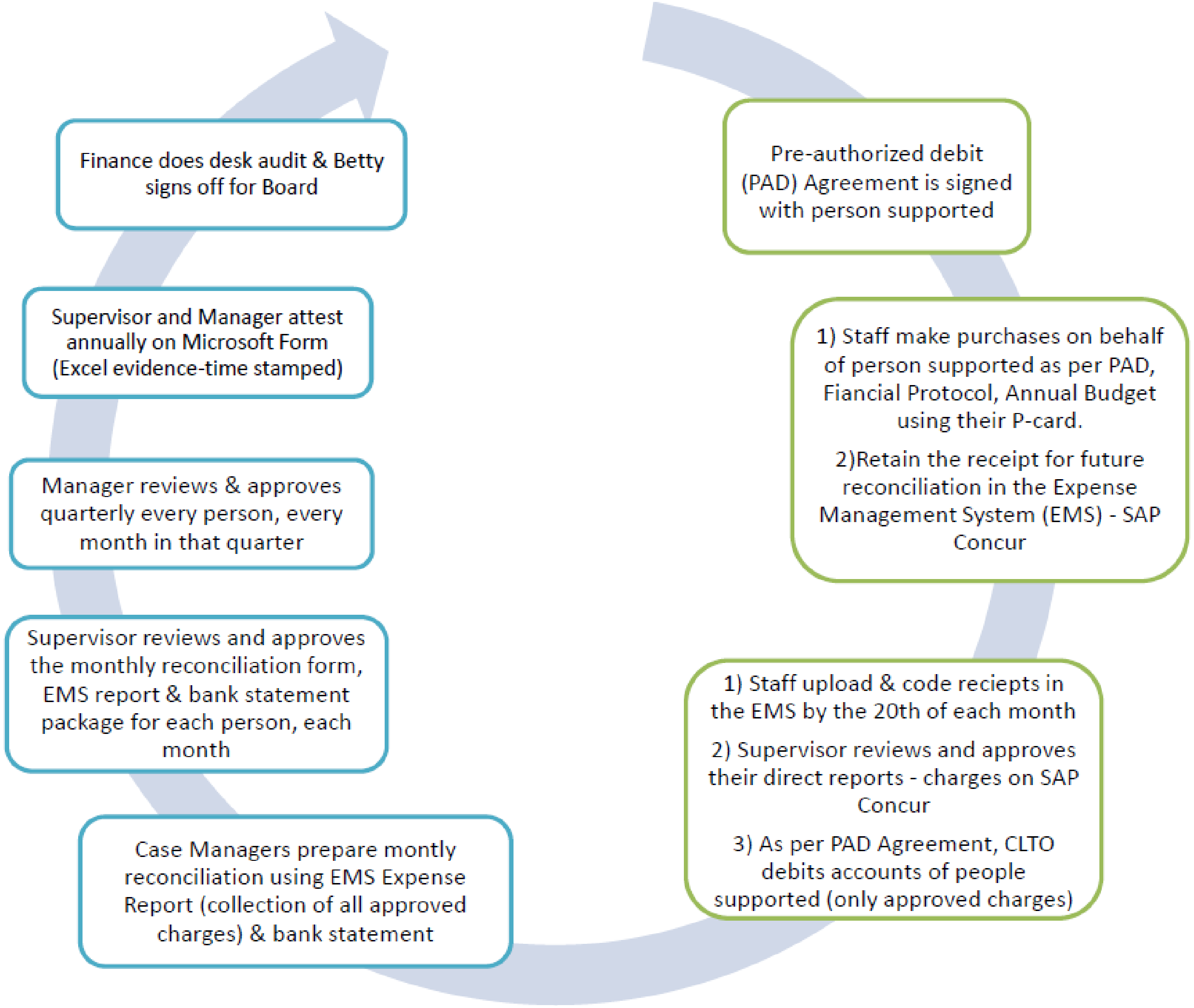
1. A copy of an “Appointment of Trustee” document Or a Power of attorney Document. This document is executed naming the Corporate Client as the Trustee or the power of attorney (legal representative) of the Client with a “physical condition”.

2. A Letter of Direction from the Corporate Client to open the account, designating their appointed Caregiver as Trustee or power of attorney for the individual.

3. An “Indemnity Agreement” signed by the Corporate Client.

Bank Account setup process

Day-to-Day Spending & Approval Process



Different Type of Cash

Individuals' Cash on Hand

Individuals' Debt Card

House Petty Cash – CLTO $

CLTO Policy - Management of Finances for People Supported

This policy outlines Practices and Responsibilities when:

- people supported manage their own finances
  - ❑ Confirmation of Financial Responsibilities letter reviewed with and signed by the individual
- families manage finances on behalf of people supported
  - ❑ Confirmation of Financial Responsibilities-Persons Supported/Caregiver letter
- CLTO manages finances on behalf of people supported
  - ❑ Annual Budget Plan
  - ❑ Financial Protocol
  - ❑ Financial record management
  - ❑ Joint accounts and Supportive Banking
  - ❑ Financial reviews and Audits

Ongoing Internal Control Improvements

Trainings

- Policy and procedures
- Fraud awareness

Cashless Transactions

- P-Card
- Pre-authorized Debit agreement

Paperless Transactions

- SAP Concur
- MyServicesConnect (CRM)

Our Recommendations

- Work with local banks to setup the Supportive Banking Process.
- Have Pooran Law or your legal council review agreements with the bank
- Move all individuals' bank accounts to the bank willing to support the process
- Close all joint accounts
- Update internal policy and procedures to reduce risks
- Ensure responsibilities are clearly understood by people supported, families and staff
- On-going internal control improvement

Questions and Comments

Thank you