
**CANADIAN SOCIETY OF ASSOCIATION EXECUTIVES (CSAE) –
TRILLIUM CHAPTER – WINTER SUMMIT**

Legal Update 101: What You Need to Know

Hamilton – February 25, 2011

**ESSENTIAL CHARITY AND NOT-FOR-PROFIT
LAW UPDATE**

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	<p>CANADIAN SOCIETY OF ASSOCIATION EXECUTIVES (CSAE) – TRILLIUM CHAPTER – WINTER SUMMIT Hamilton – February 25, 2011</p>
	<p>Essential Charity and Not-for-Profit Law Update</p> <p>By Terrance S. Carter, B.A., LL.B., Trade-mark Agent <small>tcarter@carters.ca 1-877-942-0001</small></p> <p>©2011 Carters Professional Corporation</p>
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<p>A. INTRODUCTION</p> <ul style="list-style-type: none"> • Brief highlights of the following: <ul style="list-style-type: none"> – Recent legislative initiatives under the <i>Income Tax Act</i> (“ITA”) – Recent publications from Canada Revenue Agency (“CRA”) – Changes to corporate law – Anti-Terrorism law update – Legislative update – Recent case law affecting charities and not-for-profits • For more details see Bulletins and Newsletters available at www.carters.ca, www.charitylaw.ca and www.antiterrorismlaw.ca
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<p>B. RECENT LEGISLATIVE INITIATIVES UNDER THE INCOME TAX ACT (“ITA”)</p> <p>1. Disbursement Quota Reform under Federal Budget 2010</p> <p>a) Background</p> <ul style="list-style-type: none"> • Disbursement quota (DQ) is prescribed amount that registered charities must disburse each year in order to maintain charitable registration
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- Purposes of DQ
 - Curtail fundraising costs
 - Limit administration costs
 - Limit capital accumulation
 - Ensure significant resources devoted to charitable activities
- DQ introduced in 1976
- Rules reformed by 2004 Budget – made much more complex

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b) Pre 2010 Budget 80% DQ and 3.5% DQ Rules

- A charity had to spend each year on charitable activities (including gifts to other charities) an amount that is at least equal to 80% DQ + 3.5% DQ
- Failure to meet DQ was and continues to be grounds for revocation

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c) 2010 Budget DQ Rules

- 2010 Budget released March 4, 2010
- Amending legislation received Royal Assent on December 15, 2010
- Repeal of 80% DQ
- Repeal of 80% DQ related concepts
 - Enduring property (including ten-year gifts)
 - Capital gains pool
 - Specified gifts
- Increased threshold for 3.5% DQ to \$100,000 for charitable organizations (but remains at \$25,000 for foundations)

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- Expanded anti-avoidance provisions
 - ITA permits revocation of a charity if one of the main purposes of making an inter-charity gift can reasonably be considered to unduly delay charitable expenditure
 - ITA amended to apply this to “any transaction”, not just inter-charity transfers
 - 110% penalty also possible
 - If inter-charity transfer, both charities are jointly and severally, or solitarily liable for the penalty
 - Both charities risk revocation

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- Transfers between non-arm’s length charities
 - Transferee charity must expend the entire amount by the end of the next fiscal year
 - Failure may result in 110% penalty or revocation
 - This expenditure is in addition to transferee’s normal 3.5% DQ
 - Exception – if transferor charity elects the gift to be a “designated gift” in its T3010
 - No disbursement requirement on transferee
 - Transferor cannot use the gift to meet its own 3.5% DQ

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- Accumulation of property
 - Charities can apply to CRA to accumulate property
 - Old rules - property accumulated (and income earned) with CRA approval is deemed to have been spent on charitable activities
 - New rules - accumulated property is excluded from 3.5% DQ asset base calculation
 - Accumulation permitted for particular purposes (such as a building project)

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d) Implications Of New DQ Rules

- Welcome change
- Simplicity of DQ calculation
- Eases administrative burden for charities (especially small and rural charities)
- No need to spend scarce resources allocating expenses between charitable vs administrative expenses for 80% DQ
- Increase of \$100,000 threshold for charitable organizations allows them greater ability to maintain reserves to deal with contingencies

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- A charity must still pursue its charitable purpose
- A charity must still comply with CRA's Fundraising Guidance
- Need to use "designated gift" option with transfers between non-arms length charities in order to avoid immediate disbursement requirement for recipient charity
- What to do with existing endowment funds, long-term gifts and ten-year gifts?
 - Can capital be encroached?
 - Still need to track 10-year period?
 - Still need to track hold period?
- Need to review all existing gift agreements and trust provisions in this regard

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2. July 2010 Draft Amendments

- On July 16, 2010, Finance released draft legislative proposals to implement outstanding income tax technical measures (the "July 2010 Amendments")
- Included within the July 2010 Amendments are proposed changes that will substantially impact the operations of registered charities in Canada, including split-receipting provisions and new definitions of charitable organizations and public foundations

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- Many of the proposed changes included in the July 2010 Amendments were first introduced by Finance on December 20, 2002 and in numerous amendments since then
- Although these proposed changes have yet to be enacted into law, many have already been implemented by CRA in their administrative policies
- The following is a list of some of the key amendments relating to charities in the July 2010 Amendments:

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- The split-receipting rules allow a donor to receive a limited advantage in respect of a gift having been made with only the "eligible amount" of a gift to be receipted
- The broad definition of "advantage" reduces the eligible amount of a charitable receipt where the donor received an advantage
- Complicated rules to curtail abusive donation tax shelter schemes based on a receipt for a deemed fair market value of cost (or adjusted cost base) for certain types of transactions

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- New definitions of charitable organization and public foundation replace the contribution test with the control test, permitting a charity to receive contributions of more than 50% of its capital from a donor, provided that the donor does not control the charity or represent more than 50% of the directors and trustees of the charity
- Gifts made by a charity to a non qualified donee are cause for revocation of the charity's status

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3. Bill C-470, Private Members' Bill

- As passed at Second Reading, Bill C-470 would have given CRA the discretion to revoke charitable status of a charity if it pays a single executive or employee annual compensation over \$250,000.00
- It would also have allowed CRA to publish the name, job title and annual compensation of each of a charity's five highest paid employees and executives
- The Bill was substantially amended by the Standing Committee on Finance, which presented its report to the House of Commons on December 10, 2010

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- The amended Bill-C470 no longer includes a salary cap provision
- A compensation disclosure floor of \$100,000 has been added
- The compensation disclosure requirement has been expanded to apply to all executives or employees of a charity who receive \$100,000 or more in compensation from a charity, rather than only the five highest-paid employees or affiliates
- The Standing Committee on Finance also made it mandatory for the Minister to make compensation disclosures available to the public unless "it is otherwise justified"

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C. RECENT PUBLICATIONS FROM CRA

1. Fundraising Guidance

- From the media's perspective this is a number one compliance issue for charities
- With repeal of 80/20 DQ, emphasis will now be on fundraising expenses
- While the CRA accepts that charities can have fundraising costs, its expectation is that these expenses be reasonable and proportionate to the charitable activity being conducted

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- CPS-028, *Fundraising by Registered Charities* ("Guidance") available at <http://www.cra-arc.gc.ca/chrts-gvng/chrts/plcy/cps/cps-028-eng.html>
 - The Guidance was released in June 2009 but is still not widely understood by charities
 - Focus on the calculation of fundraising ratio, i.e. the ratio of fundraising costs compared to fundraising revenue on an annual basis
 - The ratio will place a charity in 1 of 3 categories:

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- Under 35%: Unlikely to generate questions or concerns by CRA
- 35% to 70%: CRA will examine the average ratio over recent years to determine if there is a trend of high fundraising costs requiring a more detailed assessment of expenditures
- Above 70%: This will raise concerns with CRA and the charity must be able to provide an explanation and rationale for this level of expenditure, otherwise it will not be acceptable

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- Seven best practice indicators that will decrease the risk of CRA finding unacceptable fundraising
 1. Prudent planning processes
 2. Appropriate procurement processes
 3. Good staffing processes
 4. Ongoing management and supervision of fundraising practice

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- 5. Adequate evaluation processes
- 6. Use made of volunteer time and volunteered services or resources
- 7. Disclosure of fundraising costs, revenues and practice

- See also Office of the Public Guardian and Trustee, *Charitable Fundraising: Tips for Directors and Trustees*
<http://www.attorneygeneral.jus.gov.on.ca/english/family/pgt/chartbullet/bulletin-8.asp>

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- 2. CRA Guidance: Upholding Human Rights and Charitable Registration

- On May 17, 2010, CRA released *Upholding Human Rights and Charitable Registration* ("Guidance") available at <http://www.cra-arc.gc.ca/chrts-gvng/chrts/plcy/cgd/hmn-rghts-eng.html>
- According to the Guidance, "upholding human rights" refers to activities that seek to encourage, support, and uphold human rights that have been secured by law, internationally or domestically, such as the Canadian *Charter of Rights and Freedoms*, or U.N. Conventions

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- It does not include advocating for the establishment of new legal rights
- The Guidance indicates that CRA recognizes that the protection of human rights can further all four heads of charity
- Human rights charities often work outside existing legal and political structures but must ensure that their purposes are not political in nature, which is not charitable, e.g. to investigate and report violations of specified human rights instruments is not political in nature
- However, it would be unacceptable to focus on one particular country and pressure its legislature or government to sign an international human rights convention

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3. CRA Guidance on Charities Carrying on Activities Outside Canada

- July 8, 2010, CRA released Guidance entitled *Canadian Registered Charities Carrying on Activities Outside of Canada* ("Guidance") available at <http://www.cra-arc.gc.ca/chrts-gvng/chrts/plcy/cgd/tsd-cnd-eng.html>
- Updates and replaces the previous CRA publication on foreign activities entitled *Registered Charities: Operating Outside Canada* RC4106 and Registered Charities Newsletter No. 20

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- Two means available under the ITA by which a registered charity can pursue its charitable purposes
 - a) The charity can make gifts to qualified donees (generally other registered charities)
 - b) The charity can carry out its own charitable activities, which in turn would require that the charity must control all of its activities and resources (referred to as the "own activities test")

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- The key consideration that a charity must have when carrying on activities abroad is whether it meets the "own activities" test
- Defined in the Guidance as activities *"which are directly under the charity's control and supervision, and for which it can account for any funds expended."*
- Charities cannot act as a passive funding body or conduit for a non-qualified donee
- One part of the "own activities" test is the control and direction that the charity exercises over its resources
- A charity should always have an agreement in place with any intermediaries that it works with

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- Six “measures of control” to assist in meeting the “own activities test”
 - 1) Written agreements
 - 2) Description of activities
 - 3) Monitoring and supervision
 - 4) Ongoing instruction
 - 5) Segregated funds (if agency)
 - 6) Periodic transfers

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- Additional issues addressed by Guidance
 - Compliance with local laws
 - Activities that put people at risk
 - Disclosure of names of recipients
 - Anti-terrorism considerations
 - Foreign activities and the disbursement quota
 - CRA treatment of funding from CIDA

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4. Proposed Guidance for The Promotion of Animal Welfare and Charitable Registration

- On February 4, 2011, CRA released its proposed Guidance for consultation with feedback accepted until March 31, 2011
- The document sets out draft guidelines on promoting the welfare of animals and charitable registration
- Focus at common law is on what is for the benefit of humans rather than what is for the benefit of animals
- The proposed Guidance can be found online at: <http://www.cra-arc.gc.ca/chrts-gvng/chrts/plcy/cnsltms/pwcr-eng.html>

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5. CRA Views on Not-for-Profit (NPO) Status

- A number of recent CRA technical interpretations and comments on
 - Capacity of NPOs to earn profits
 - Carrying on a trade or business through an NPO
 - Tax consequences of losing NPO tax exemption
- See separate presentation by Theresa Man

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D. CORPORATE UPDATE

1. New *Canada Not-For-Profit Corporations Act* (CNCA)

- There have been several attempts at legislative reform to the *Canada Corporations Act* ("CCA")
- On June 23, 2009 *Canada Not-for-Profit Corporations Act* ("CNCA") received Royal Assent, but not yet proclaimed in force
- Draft regulations were published by Industry Canada on June 25, 2010 but not yet finalized
- Estimated that CNCA will likely come into force in mid 2011

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- Overview of the Key Elements of the CNCA
 - Simplified process of incorporation
 - A corporation has the capacity and rights of a natural person
 - Concept of a corporation's activities being *ultra vires* now eliminated once and for all
 - Objective standard of care as opposed to subjective standard of care
 - Due diligence defence available
 - Enhanced member's rights

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- Enhanced member's remedies
- Special exemption from remedies for religious corporations
- Introduces concept of soliciting and non-soliciting corporations
- Graduated audit requirements
- All existing CCA corporations will be required to continue under the new Act within 3 years of it coming into force (or face possibility of dissolution)
- If the corporation is a charity and there is a change of objects, it would be advisable to obtain CRA approval in advance

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- Ongoing Concerns with the CNCA
 - Definition of soliciting corporation [\$10,000] threshold is too low
 - Directors must be elected. There is no provision for ex-officio directors
 - Non-profits that are soliciting face a predicament on dissolution (i.e. to "qualified donees")
 - Different approval requirements (i.e. simple v. 2/3 majority) for by-laws may be difficult to administer

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- Non-voting members have a right to vote to approve certain fundamental changes
- Filing of financial statements by soliciting corporations with The Director and the level of financial review imposes an increased burden on soliciting corporations
- CRA to develop policy on requirements for charities continuing under CNCA (current estimated number of 7,600 federally incorporated charities)

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2. New Ontario Not-For-Profit Corporations Act (ONCA)

- The Ontario Corporation Act ("OCA") has not been substantively amended since 1953
- Bill 65 introduced the new Ontario Not-For-Profit Corporations Act ("ONCA")
- ONCA introduced on May 12, 2010 and received Royal Assent on October 25, 2010
- However, ONCA not expected to be proclaimed in force until sometime in 2012
- Regulations have not yet been released

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- Overview of the Key Elements of the ONCA
 - Incorporation as of right
 - Capacity, rights and powers of a natural person
 - Minimum of 3 directors
 - *Ex officio* directors permitted
 - Objective standard of care instead of subjective standard of care
 - Due diligence defence available
 - Enhanced membership rights
 - Some enhanced members remedies, but not as much as the CNCA

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- Definition of "charitable corporation" is now common law definition
- Public benefit corporation is concept similar to soliciting corporation in CNCA
- Graduated audit requirements
- For existing non share capital corporations once the Act is enacted, there will be a period of up to 3 years to continue but this is not expected until sometime in 2012

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- Ongoing Concerns with the ONCA
 - Definition of PBC [\$10,000] threshold is too low
 - Non-voting members rights to vote on fundamental changes may lead to problems with other large membership based organizations
 - Weak liability protection, as the government rejected the recommendation to include a partial liability shield for directors. Due diligence defence by itself not adequate
 - Mandatory provision requiring solicitation of proxies instead of allowing a corporation to structure its own decision making process on absentee voting (i.e. allowing an option to vote by secret mail in or by electronic ballot)

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E. ANTI-TERRORISM LAW UPDATE

1. Report of the Air India Inquiry – Terrorist Financing

- The final report of the Air India Inquiry was released on June 17, 2010
- Selected findings regarding terrorist financing laws include the following:
 - Neither FINTRAC nor CRA are sufficiently incorporated into the flow of intelligence to maximize attempts at detecting terrorist financing
 - The lack of prosecutions indicates a possible lack of "significant success"
 - Terrorists can use charities and NPO's as a way to finance their activities although it is not possible to state how many registered Canadian charities have been involved in terrorist financing

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- CRA has been making use of its intermediate sanctions, which include monetary penalties and suspension of registration
- Charity status is more difficult to obtain due to the new terrorist financing requirements
- Measures to defeat the use of charities for terrorist financing should not unnecessarily impede the valuable activities of legitimate organizations
- The work of honest charities should not be hindered by unrealistic guidelines or best practices

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F. ONTARIO LEGISLATIVE UPDATE

1. Bill 212: *Good Government Act*

- On December 15, 2009, the *Good Government Act*, 2009 ("the Act") received Royal Assent
- The Act contains significant reforms of the charitable sector in the province of Ontario
 - The Act repeals the *Charitable Gifts Act*, which had limited the ability of charities in Ontario to own no more than a 10% interest in a business

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- The Act also amended the *Charities Accounting Act*
 - Expands power of the Ontario Public Guardian and Trustee ("OPGT") to require documents and make inquiries
 - New section 8 provides that a person who holds an interest in real or personal property for a charitable purpose must use the property for the charitable purpose (old section 8 permitted OPGT to vest real property in its name if the property had not been used for charitable purposes within 3 years)

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- *Accumulations Act* amended to the effect that the common law and statutory rules regarding accumulations do not and are deemed to have never been applied to a charitable purpose trust
- *Religious Organizations' Lands Act* amended so that the 40 year term limit for which a religious organization may lease land is repealed

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2. Bill 168: *The Occupational Health and Safety Amendment Act*

- The *Occupational Health and Safety Amendment Act, (Violence and Harassment in the Workplace), 2009* came into force on June 15, 2010
- The legislation designates workplace violence and harassment as occupational health and safety hazards under the OHSA
- Establishes new obligations for employers with respect to workplace violence and harassment prevention

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- The new legislation will require employers with more than 5 employees to:
 - Develop and communicate workplace violence and harassment prevention policies and programs to workers
 - Assess the risks of workplace violence, and take reasonable precautions to protect workers from possible domestic violence in the workplace
 - Allow workers to remove themselves from harmful situations if they have reason to believe that they are at risk of imminent danger due to workplace violence

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3. Land Transfer Tax Amendments Affecting Charities

- October 1, 2010 the Ontario Ministry of Finance filed Ontario Regulation 386/10 made under the *Land Transfer Tax Act* which permits the exemption from land transfer tax for certain transfers of property between charities
- Announced as part of March 2010 Budget
- Will facilitate reorganizations of charities that might have been subject to land transfer tax if there was an assumption of debt

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- Transfers of land after March 25, 2010 from trustees to a non share capital corporation or between two non share capital corporations will be eligible for exemption if :
 - The non share capital corporation will be continuing the same charitable purposes for the same members
 - No consideration is paid other than the assumption of any existing liabilities registered on the land

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4. Accessibility for *Ontarians with Disabilities Act*, 2005

- Ontario Regulation 429/07, Accessibility Standards for Customer Service, requires that providers of goods and services establish policies, practices and procedures governing the provision of goods or services to persons with disabilities
- Requirements will include policies for accessibility, service animals and support persons, notice of disruptions to service, staff training, and extensive reporting obligations
- Will apply to charities and not-for-profits as of January 1, 2012
- See www.accession.ca for more information

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5. *Fighting Internet and Wireless Spam Act (FISA)*

- FISA, which creates a new regulatory scheme for spam and related unsolicited electronic messages, received Royal Assent on December 14, 2010, but not expected to be in force until mid-2011
- Contains broad definitions of “commercial activity” and “electronic message” and will include charities
- Prohibits sending an electronic message without the express or implied consent of the recipient
- Implied consent can arise from a donation or gift made to a charity within the previous two years, or from membership in a non-profit
- FISA imposes significant monetary penalties, which can include a maximum fine of \$10,000,000 for a corporation

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G. RECENT CASE LAW AFFECTING CHARITIES

1. *Christian Horizons* Decision
- The *Christian Horizons* (2010 ONSC 2105) decision in May 2010 by the Ontario Divisional Court provides churches and religious organizations with insight into how to carefully plan, document and implement employee lifestyle statements where such statements are on their face contrary to the *Human Rights Code*

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- The decision affirmed that in order for a religious organization to claim the benefit of the s.24(1)(a) exemption with regard to a lifestyle statement that is contrary to the Code, the religious organization must prove that:
 1. It is a religious organization
 2. It is primarily engaged in serving the interests of people identified by their creed and employs only people similarly identified

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3. The restriction in employment to persons similarly identified by creed is a reasonable and *bona fide* qualification because of the nature of the employment (“BFOQ requirement”)
- The Court found that Christian Horizons met requirements 1 and 2 above but not requirement 3
- The Court also found that in any event there was evidence of a “poisoned work environment” but provided little guidance concerning what constitutes a “poisoned work environment”

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2. *Ontario Society for the Prevention of Cruelty to Animals v. Toronto Humane Society*, 2010 ONSC 2182 (April 13, 2010)

- Affirms that directors of charitable organizations have fiduciary duties toward the charity
- Also emphasizes that with these enhanced duties comes an enhanced power of the courts to monitor and regulate charities
- This authority extends so far as to provide the court with the authority to order the destruction of charitable property


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3. *London Humane Society (Re)*

- Judgment of the Ontario Superior Court of Justice, Released November 12, 2010
- Affirms that directors of charitable and not-for-profit corporations are fiduciaries to the corporation and must act in good faith in accordance with their by-law
- Provides protection to directors who partake in a procedurally flawed process to adjust the process for membership renewal or approval
- However, states that the board cannot act arbitrarily with respect to approval of membership

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