



Category: Finance	Responsible Owner: Executive Director - Society	Effective Date: May 19, 2020
Policy Number: 3.4	Final Approval Body: Board of Governors	Proposed Review Date: April 2021
Policy Name: Fundraising and Donation Acceptance Policy	Forms: Donation Receipt Fundraising Activity Form	Amendment History:

A. POLICY:

PURPOSE/COMMITMENT:

This policy is intended to guide all fundraising activities at Columbia College as well as the acceptance of donations on behalf of Columbia College.

SCOPE:

1. This Policy applies to all persons, including students, staff, volunteers, committees, sub-committees, or groups affiliated with Columbia College soliciting gifts on behalf of Columbia College.
2. This Policy applies to all donations to Columbia College from donors.
3. This Policy does not apply to sponsorships.

WHEN TO USE THE POLICY:

1. When any group, club, committee or person who is affiliated with Columbia College will be carrying out fundraising activities or soliciting donations to support the mission and charitable purposes of Columbia College.
2. When any organization or individual makes a donation to Columbia College.

DEFINITIONS:

1. For clarity, and in cases of ambiguity, this policy will refer to terms from the Canada Revenue Agency's "*Charities and Giving Glossary*" available online
2. **Donation:** a voluntary transfer of property from a donor to Columbia College without any expectation of return or benefit.
3. In this Policy, the use of the term "**gift**" is used interchangeably with the term "**donation**".
4. **Charitable gift:** any donation of cash, goods, land, or listed securities to a registered charity or other qualified donee that is recognized and eligible for a charitable tax credit by the Canada Revenue Agency
5. **Fundraising:** any activity that includes a solicitation of present or future donations of cash or non-cash gifts, or the sale of goods or services to raise funds, whether explicit or implied
6. **Gift-in-kind:** a donation in any form other than cash or cash-equivalents and normally requires valuation for official donation receipt purposes. Examples include personal property, such as special collections, artwork, equipment, securities, and cultural property; and real property
7. **Fair market value:** normally the highest price, expressed in dollars, that property would bring in an open and unrestricted market, between a willing buyer and a willing seller who are both knowledgeable, informed, and prudent, and who are acting independently of each other.
8. **Publicly-traded securities:** a specific type of gift-in-kind, and are securities traded on a stock exchange designated under the Income Tax Act (Canada).

9. **Estate gift:** a donation where Columbia College is the beneficiary of a Will, life insurance policy or retirement benefits, or is appointed executor of a Will, or is the trustee of assets, and may be cash, cash-equivalent or a gift-in-kind.
10. **Planned gifts:** include but are not limited to wills, life insurance policies, charitable gift annuities, charitable remainder trusts, gifts of residual interest, and gifts of retirement benefits.

POLICY STATEMENTS:

1. Columbia College is committed to excellence in pursuing its charitable purposes of supporting students to advance their education and achieve success. Columbia College welcomes donations from individuals, industry, foundations and other sources that enable it to achieve its vision.
2. Columbia College values and will protect its integrity, quality of programs, diversity, fairness, and transparency, and will not accept donations when a condition of such acceptance would compromise these fundamental principles.
3. The Executive Director of the Society is responsible for the coordination of all fundraising activities, including the overall supervision and management of fundraising programs, administration of staff, and management of the cultivation, solicitation, and stewardship of all donors.
4. Columbia College generally accepts donations in the form of cash, cheque or Visa for amounts up to \$200, and for amounts greater than \$200, cheque, money transfer or Visa, or gifts-in-kind of personal and real property.
5. Ownership of all donations vests in Columbia College whether they are for the benefit of Columbia College generally or for some specific purpose in it.
6. Columbia College is committed to undertaking fundraising activities in accordance with the highest standards of accuracy, truth and integrity. All persons involved in fundraising on behalf of Columbia College are expected to adhere to the same standards. They will inform, serve, guide and otherwise assist donors who wish to support Columbia College activities but will not pressure or unduly persuade.
7. Columbia College does not provide any legal, accounting, tax or financial advice to donors with respect to donations to Columbia College and encourages donors to seek independent legal, accounting, tax or financial advice from professionals. Donors are responsible for costs incurred from obtaining advice.
8. Undesignated Gifts: Where the donor does not provide a wish or direction as to the specific use of the donation, it will be used at the discretion of the Executive Director for purposes that advance Columbia College's vision and mission.

B. PROCEDURES:

1. ISSUING OFFICIAL RECEIPTS FOR TAX PURPOSES:

- a. The Executive Director is responsible for issuing official donation receipts for donations received by Columbia College, in compliance with the requirements of the Income Tax Act (Canada), Canada Revenue Agency guidelines, and in accordance with procedures established by Columbia College.
- b. Columbia College will issue official donation receipts for donations of \$25 or more in compliance with the Income Tax Act and Canada Revenue Agency guidelines, as amended from time to time. Official donation receipts will not be issued for donations that are less than \$25.
- c. When a donation is offered from a donor, it is the responsibility of the Executive Director in consultation with the Financial Controller to determine whether it qualifies for an official donation receipt. This will be communicated to the donor.

2. ACCEPTING DONATIONS:

- a. The Executive Director and Principal are both authorized to negotiate donations on behalf of Columbia College. The Executive Director and Principal are also authorized to decline any donation on behalf of Columbia College. Where the value of the donation equals or exceeds \$500,000, or the donation is sensitive and/or precedent-setting, the Executive Director will make a recommendation

- to the Board of Governors regarding the acceptance of the donation and the Board of Governors will be responsible for deciding on behalf of Columbia College whether to accept or decline the donation.
- b. In determining whether a donation is sensitive or precedent-setting, the Executive Director will consult with the Principal or the Head of the Division responsible for the area or function of Columbia College that will benefit from the donation and will consider whether the donation:
 - i. includes any conditions of acceptance, or prescribes a particular use;
 - ii. could improperly benefit any individual or organization;
 - iii. requires an arrangement to conduct business with a specified individual or organization or future employment;
 - iv. is financially unsound;
 - v. could expose Columbia College to uncertain and potentially significant liability or unacceptable risk;
 - vi. could compromise Columbia College's public image, reputation or expose Columbia College to embarrassment;
 - vii. may require work to sustain the donation that is disproportionate to the size or benefit of the donation;
 - viii. may have come from illegal activities;
 - ix. has terms that may require Columbia College to violate human rights;
 - x. would require Columbia College to expend resources on activities that are not consistent with its academic priorities; and/or
 - xi. would give the donor or the donor's representative the right to designate the recipient of a donation including an award, lectureship, professorship, chair, other honorific.
 - c. The Executive Director and Principal are also authorized to accept donations on behalf of Columbia College under \$500,000 by consulting with the Financial Controller, unless the donation is sensitive and/or precedent-setting.
 - d. The cumulative sum of all donations issued by an individual or organization within a given fiscal year will be used for the purposes of calculating whether a donation amount falls within, or over, the threshold in this policy.
 - e. All donation agreements requiring execution by Columbia College must be executed on behalf of Columbia College by signatories who have been delegated signing authority.

3. FUNDRAISING ACTIVITIES, EVENTS, AND/OR PROGRAMS

- a. Any person, group, club or committee at the College that would like to organize or implement a fundraising activity, event, or program must submit a written proposal to the Executive Director for approval in advance.
- b. The Executive Director can approve activities, events or programs with fundraising targets up to \$10,000.
- c. Fundraising events that require expenditures from the College must fall within the budgeted amounts for charitable activities and fundraising for any given year. Fundraising events that require College expenditures beyond the annual budget must be submitted to the Board of Governors for approval.
- d. Activities, events or programs with fundraising targets over \$10,000 must be approved by the Board of Governors.
- e. Proposals for fundraising activities, events, or programs must include the following:
 - i. A description of how the proposed activity will advance the mission and charitable purposes of the College.
 - ii. What expenses are required for the event, and how expenses will be covered.
 - iii. A description of where the raised funds will be directed.
 - iv. A description of how donations will be received, tracked, and administered, including how cash will be accounted for and handled. Donations of all kinds must be overseen and managed by a minimum of two people as part of any event or activity.

4. DONOR ANONYMITY:

- a. Columbia College will, at the request of the donor, maintain the donor's anonymity, subject to the following necessary limitations:
 - i. Columbia College maintains donor records as required by Canada Revenue Agency for official donation receipting purposes.
 - ii. Columbia College will comply with legal and governmental obligations to disclose the names of donors and the nature and value of their donations as required under the Income Tax Act, the Freedom of Information and Protection of Privacy Act or other government policies or laws.
 - iii. The identity of a donor requesting anonymity may be provided to the Board of Governors on an oral basis if the Board so requests. Such information is confidential and shall neither appear in the minutes of the meeting nor be used by Board members or officers outside the meeting of the Board of Governors.
 - iv. Prospective donors requesting anonymity are advised by Columbia College that their names, and the nature and amounts of their donations, will be disclosed as above.

5. GIFTS IN KIND:

- a. Conditions of Acceptance
 - i. The gift in kind should be such that it can be retained as a College asset and used in connection with College activities, with discretion as to its use and management, or disposed of for cash or cash equivalent with the proceeds to be used to support Columbia College's mission at the discretion of the College.
 - ii. Where the donor has requested conditions be placed on the gift-in-kind such as restrictions on sale, leasebacks, life interests, life estates or in situations where the asset is difficult to appraise, the Executive Director will consult with the Financial Controller and the Board of Governors as appropriate.
 - iii. The Executive Director will request advice from the Principal, the VP of Operations, and the Financial Controller regarding any insurance issues that acceptance may entail.
- b. Valuation for Official Donation Receipting Purposes of gifts in kind other than Publicly-Traded Securities
 - i. For a donation of \$1,000 or less, a qualified College employee who is knowledgeable in the field of the donation can appraise the fair market value of the gift, and an official donation receipt can be issued based on the appraisal.
 - ii. For a donation over \$1,000, an independent appraisal is required.
 - iii. The cost of appraisals will normally be borne by the College. In certain cases, such as where the gift in kind is difficult and expensive to appraise, the donor may be asked to absorb the cost.
- c. Administration and/or Disposition of a gift in kind other than Publicly-Traded Securities generally resides with the Executive Director.

6. PUBLICLY TRADED SECURITIES

- a. Where an individual or organization wishes to donate publicly traded securities to Columbia College, they are to indicate their intention in writing to the Executive Director.
- b. The Executive Director will then convene a Gift Advisory Committee to confirm conditions for the acceptance of the securities (such as how the securities will be valued for the purposes of issuing a tax receipt, the date at which the shares will be deemed to have been accepted, and how the securities will be disposed of by the College). The Gift Advisory Committee will comprise:
 - i. The Executive Director
 - ii. The Chair or the Treasurer of the Board of Governors
 - iii. The Principal

- iv. The Financial Controller
- v. The Chair of the Finance Committee
- c. The Gift Advisory Committee will also make a recommendation to the Board of Governors describing the intended use and allocation of the donated securities.

7. ESTATE GIFTS

- a. Where an individual or organization wishes to make an estate gift to Columbia College, they are to indicate their intention in writing to the Executive Director.
- b. The Executive Director will then convene a Gift Advisory Committee to confirm conditions for the acceptance of the estate gift and obtain any legal counsel or advisory support that may be necessary. The Gift Advisory Committee will comprise:
 - i. The Executive Director
 - ii. The Chair or the Treasurer of the Board of Governors
 - iii. The Principal
 - iv. The Financial Controller
 - v. The Chair of the Finance Committee
- c. The Gift Advisory Committee will also work through the technicalities of how the estate gift is to be managed, accounted for, and administered, and make a recommendation to the Board of Governors for approval.

8. PLANNED GIVING

- a. Where an individual or organization wishes to make deferred donation to Columbia College in the form of a planned giving mechanism they are to indicate their intention in writing to the Executive Director.
- b. The Executive Director will then convene a Gift Advisory Committee to confirm conditions for the acceptance of the donation and obtain any legal counsel or advisory support that may be necessary. The Gift Advisory Committee will comprise:
 - i. The Executive Director
 - ii. The Chair or the Treasurer of the Board of Governors
 - iii. The Principal
 - iv. The Financial Controller
 - v. The Chair of the Finance Committee
- c. The Gift Advisory Committee will also work through the technicalities of how the deferred donation is to be managed, accounted for, and administered, and make a recommendation to the Board of Governors for approval.

LINKS TO SUPPORTING FORMS, DOCUMENTS, WEBSITE:

<https://www.canada.ca/en/revenue-agency/services/charities-giving/charities/charities-giving-glossary.html>
[Donation Receipt Template](#)
[Fundraising Activity Form](#)

REFERENCE TO EMPLOYMENT AGREEMENT CLAUSES:

REFERENCE TO BYLAWS or ARTICLES:

RELATED ACTS AND REGULATIONS:

Income Tax Act R.S.C. 1985, c. 1

Freedom of Information and Protection of Privacy Act R.S.B.C. 1996, c. 165

RELATED POLICIES:

Columbia College Sponsorship Policy.

APPROVALS:

Responsible Owner: <small>DocuSigned by:</small> <i>Mark Friesen</i> <small>BFFD4798049D48D...</small>	Date: 5/15/2020
Principal or Designate: <small>DocuSigned by:</small> <i>Robin Hemmingsen</i> <small>3E3A8ED7A11AFB...</small>	Date: 5/19/2020
IF APPLICABLE:	
Chair, Finance Committee:	

APPROVAL FOR ALL POLICIES

Chair, Board of Governors <small>DocuSigned by:</small> <i>Crystal Eversman</i> <small>3C980200E018485...</small>	Date: 5/20/2020
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Revision Date(s):	Replaces Policy Number:
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