



7331-0 (CFMWS)

10 August 2020

Distribution List

**NON-PUBLIC PROPERTY
(NPP) FUNDRAISING POLICY**

Reference: NPP Sponsorship and
Donation Policy dated July 2015

1. The enclosed NPP Fundraising Policy provides the revised policy on donations, sponsorship and the introduction of 3rd party fundraising. It is hereby approved and supersedes reference.

Le directeur général des Biens non publics,

Sean N. Cantelon
Managing Director Non-Public Property

Enclosure: 1

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7331-0 (CFMWS)

Le 10 août 2020

Liste de distribution

**POLITIQUE DES BIENS
NON PUBLICS (BNP) EN
MATIÈRE DE COLLECTE DE FONDS**

Référence. : Politique des BNP sur les dons et les
commandites, juillet 2015

1. La Politique des BNP en matière de collecte de fonds ci-jointe comprend la politique révisée sur les dons, les commandites et l'introduction d'activités de collecte de fonds organisées par des tiers. Par les présentes, elle est approuvée et remplace la politique en référence.

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NPP FUNDRAISING POLICY

DATE OF ISSUE: 10 August 2020

SUPERSESION

- NPP Sponsorship and Donation Policy (July 2015)

APPLICATION

1. The aim of this policy is to provide direction on fundraising activities conducted by or with those acting in their Non Public Property (NPP) capacity. It aligns with the NPP accountability framework, which includes the Chief of Defence Staff (CDS) Delegation of Authorities for Financial Administration of NPP and governance of NPP. For the purposes of the NPP Fundraising Policy and Guide, fundraising is defined as:

- a. Donations – cash and in kind services and products;
- b. Proceeds from fundraising sales; and
- c. Sponsorship

2. This policy applies to members of the Canadian Armed Forces, Staff of the Non-Public Funds, Canadian Forces, and external entities authorized to act on their behalf. This policy shall be read in conjunction with the NPP Fundraising Guide.

APPROVAL

3. This policy is issued under the authority of the Managing Director NPP.

ENQUIRIES

4. Enquiries in regards to the policy itself shall be directed to the NPP Sponsorship and Donation Program Manager.

DEFINITIONS

5. Authorized Agent (AA). An individual that is trained and certified by Canadian Forces Morale and Welfare Services (CFMWS) to solicit/accept donations and sponsorships from external entities in support of NPP Programs/Events.

6. Canadian Armed Forces (CAF) Community. The broad community of groups served by NPP Operations.

7. Donation. A monetary or non-monetary gift with value, made to NPP, with the aim of serving organizational objectives, by an individual, organization, company, corporation, or other body.
8. External Entity. A private individual, charitable or not-for-profit organization, government organization, or for-profit, commercial business/company. This policy distinguishes between businesses / companies that have dealings with Department of National Defense (DND)/CAF (Defence Industry) and those not involved with DND/CAF (Non-Defence Industry).
- a. Defence Industry: Comprises businesses that are specifically involved in research, development, production, service and support of military materiel, equipment and facilities such as aircraft, ships, tanks, related systems, as well as component parts and consumables; and
 - b. Non-Defence Industry: Includes businesses that provide products or services that could be purchased for personal use by the general Canadian public.
9. Principal Authorized Agent (PAA). An AA appointed by the Managing Director NPP for National NPP Programs/Events; or Base/Wing/Ship Commanders for Local NPP Programs/Events; or Reserve Brigade/Region Commanding Officers (or equivalent) for Reserve Units. The PAA acts on his / her behalf and under his / her control, on all matters relating to their NPP fundraising activities.
10. Proceeds from Fundraising Sales. Percentage of sales from specific goods to raise funds for an authorized purpose (e.g. produced for fundraising purpose, on consignment, cause-related marketing, donated to monetize into proceeds via auction, activities, etc.).
11. Sponsorship. A collaborative agreement between NPP and an external entity, whereby funds, goods, facilities or services are provided to support a particular NPP Program / Event, in exchange for some appropriate non-monetary benefit of approximately equal value.

POLICY

12. PAA/AAs must complete the mandatory AA training available on the DLN and be approved by their respective PAA prior to soliciting and accepting donations and sponsorship for any fundraising event (NPP or external entity). AAs may be CAF members, DND employees, Staff of the Non-Public Funds, Canadian Forces, registered NPP volunteers, or a contractor if

pre-approved by Managing Director NPP. Percentage-based or “off-the-top” remuneration cannot be used to compensate individuals who solicit, accept and approve donations and sponsorships on behalf of NPP Programs / Events.

13. Those acting in an authorized NPP capacity or role (PAA / AA) may conduct an active or passive fundraising activity for the following purposes:

- a. NPP - to support the development, sustainment and enhancement of NPP Programs, Events, and Initiatives;
- b. Enhancement of Public reimbursable programs; sustainment costs require pre-approval in writing by the Managing Director NPP; and
- c. Third Party – to support third party charity / not-for-profit events such as Canadian Tire Jumpstart and local hospital campaigns that are:
 - i. Expected to generate tangible benefits for the CAF community; or
 - ii. Approved in writing in advance by the Managing Director NPP.

14. For a fundraising activity conducted by NPP to be considered in the CAF community interest, its advantage or benefit must be in all cases tangible, either direct or indirect:

- a. Tangible – financial, in-kind, new and improved programs and services, NPP cost avoidance, efficiencies, communication and outreach to the broader CAF community;
- b. Direct – When the money received from a fundraising activity conducted by NPP is intended to benefit the CAF community in a highly targeted manner; and
- c. Indirect – When the money received from a fundraising activity conducted by NPP is intended to benefit members of society / general public, including members of the CAF community as eligible and possible beneficiaries.

15. NPP fundraising must:

- a. Align with CAF and CFMWS strategic objectives and be executed within the NPP Accountability Framework;

- b. Be approved in accordance with the CDS Delegation of Authorities for the Financial Administration of NPP for local and National NPP Programs / Events and Support Our Troops;
 - c. Comply with all federal and provincial legislation including, but not limited to, *The Tobacco and Vaping Products Act* and *The Cannabis Act*, in addition to all applicable regulations, policies and guidelines as outlined in the reference section of this policy;
 - d. Stand the test of public scrutiny and transparency by ensuring event is well documented;
 - e. Comply with contractual agreements and first right of refusal obligations in place between NPP entities such as CANEX, SISIP Financial, Canadian Defence Community Banking and their service providers, and shall not compete directly with these services in addition to strategic relationships and partnerships managed at the national CFMWS level;
 - f. Be free from any real or perceived Conflict of Interest (COI), expectation or perception of preferential treatment from DND/CAF or CFMWS;
 - g. Be limited to an appropriate level for sustainment of Programs / Events reimbursed by the Public;
 - h. Not imply DND / CAF or CFMWS endorsement of any products, services and external entities and be politically neutral with no association to lobbyists or lobbyist organizations; and
 - i. Be organized and / or managed by members of the CAF, employees of DND and / or Staff of the Non-Public Funds, Canadian Forces.
16. Fundraising shall not be used to support the following:
- a. Public programs delivered under the Public Accountability Framework; or
 - b. Sponsorship for ongoing NPP operating expenses such as salaries and wages, depreciation, or loan/interest payments etc.
17. Sponsorship from the tobacco industry is not permitted as per *The Tobacco and Vaping Products Act*. In addition, donations from the tobacco industry are not permitted due to the negative impact. Sponsorship from the cannabis industry is not permitted as

per *The Cannabis Act*; however, donations are allowable. Donations and sponsorship from the alcohol industry is allowed but at the discretion of local authorities.

18. For all sponsor support provided; a Sponsors Support Agreement must be completed in advance and similar to a contract must be approved by the appropriate authority in advance of receiving funds. More details and a sample of the approved Sponsor Support Agreement template, refer to the NPP Fundraising Guide. Since this is similar to a contract, individuals must take the NPP Contracting and Procurement course available on the Defence Learning Network (DLN).

19. All donations and sponsorship fundraising revenue shall be documented, accounted for, and reported in the NPP financial accounting records in accordance with A-FN-105.

20. Annex A provides a sample list of Programs, Events, and Initiatives whereby fundraising and the acceptance of donations and sponsorship can apply.

AUTHORITIES / RESPONSIBILITIES

21. The key roles and responsibilities associated with the NPP Fundraising Policy are identified at Annex B.

22. A summary of financial delegated authority for the acceptance of donations, sponsorship and fundraising activities can be found at Annex C.

REFERENCES

Canada Revenue Agency policies, directives, guidelines (charities, fundraising)

Chief of the Defence Staff Delegation of Authorities for Financial Administration of NPP
A-FN-105-001/AG-001 – Policy and Procedures for NPP Accounting

NPP Contracting Policy

CFMWS Values and Ethics Policy

CFMWS Conflict of Interest Policy

Annexes

Annex A – Example of Acceptable Programs, Events, and Initiatives

Annex B – Responsibility Table

Annex C – Financial Authorities

ANNEX A – EXAMPLE OF ACCEPTABLE PROGRAMS, EVENTS AND INITIATIVES

1. The following are examples of Programs, Events, and Initiatives whereby fundraising is appropriate:
2. **Programs**
 - Support Our Troops program including Support Our Troops Fund, Soldier On, Hospital Comforts Fund, Operation Santa Claus, and Boomer's Legacy;
 - Community recreation programs including youth centres, hobby clubs and other leisure activities;
 - Specialty Interest Activities including golf and curling clubs, marinas, sailing and vacation accommodations;
 - Special mess events;
 - CAF Museums;
 - Regimental Branch, Corps and Group Funds;
 - National/Local volunteer appreciation/recognition events; and
 - NPP Military Family Resource Centres.
3. **Events (National)**
 - CAF Sports Awards Ceremony;
 - CAF Imagery Contest;
 - June is Recreation Month;
 - Canada Army Run;
 - Royal Canadian Navy (RCN) Bike Ride; and
 - Royal Canadian Air Force (RCAF) Run.
4. **Events (Local)**
 - Family Days;
 - Air Shows;
 - Base/Wing Welcomes;
 - Recreation Expos;
 - Concerts;
 - Beach Days;
 - Enhancing the Margin of Excellence for Officer Cadets at Canadian Military Colleges;
 - Social activities around milestone commemorations;
 - Prizes and awards for Unit golf tournaments; and
 - Annual Unit social gatherings such as Christmas parties and staff parties.
5. **Initiatives for 3rd Parties**
 - Military Family Resource Centres;
 - CAF Chaplaincy managed causes at the local level;
 - Fundraising activity conducted by NPP jointly with the local civic centre, with the donations and sales proceeds to be used for a mutually beneficial expansion of CAF and civic recreation opportunities and resources, rather than generate competition between existing under-resourced programs;

ANNEX A – EXAMPLE OF ACCEPTABLE PROGRAMS, EVENTS AND INITIATIVES

- Donations and sales proceeds from the NPP fundraising activity conducted at the local Canadian Tire solely for the “Jumpstart Foundation” (formal partnership), whereby all the donations and proceeds are expended by the Jumpstart Foundation to address CAF community recreational requirements/needs;
- NPP fundraising activity conducted for a local hospital foundation initiative that will benefit the CAF community utilizing the hospital services; and
- Fundraising for Charities/Groups’ initiatives supporting CAF Community e.g. the Legion ,True Patriot Love (TPL) ,Wounded Warrior etc.

ANNEX B – NPP FUNDRAISING POLICY – RESPONSIBILITY TABLE

The	Is responsible for
Canadian Forces Legal Advisor	<ul style="list-style-type: none"> • Providing legal advice as required relating to NPP Fundraising, the acceptance of donations and sponsor support agreements.
Managing Director NPP	<ul style="list-style-type: none"> • Approving the NPP Fundraising Policy • Ensuring the management and oversight of all fundraising activities conducted by / with NPP pursuant to the NPP Fundraising Policy; • Developing and overseeing strategic management and planning for fundraising activities; • Creating, developing, implementing a management framework; • Authorizing the NPP Fundraising Guide; • Approving NPP Fundraising activities in accordance with the CDS Delegation of Authorities for Financial Administration of NPP; • Approval of fundraising for Public reimbursable Programs or Activities; and • Ceasing fundraising activities if rules, regulations, and operating principles have not been applied.
Base/Wing Commanders and Reserve Brigade/Region Commanding Officer	<ul style="list-style-type: none"> • Overseeing / ensuring coordination of all fundraising activities in their area of responsibility and undertaken with their delegated authority; • Approve NPP fundraising Programs and Events in accordance with the CDS Delegation of Authorities for Financial Administration of NPP; • Appointing a PAA to manage all local NPP fundraising activities and send a letter of appointment to the Chief Financial Officer for endorsement and registration; • Developing and creating local standing orders/standard operating procedures; • <u>Fundraising for NPP purposes only</u> – as appropriate sub-delegating within policy limits the approve role and the delegated NPP approval authorities for NPP fundraising activities; and • <u>Fundraising for 3rd Party Purposes</u> – applying direct control and oversight by carrying out the approve role and the delegated NPP approval authorities for all fundraising activities for external causes.

ANNEX B – NPP FUNDRAISING POLICY – RESPONSIBILITY TABLE

The	Is responsible for
Chief Financial Officer	<ul style="list-style-type: none"> • Overseeing the execution of the NPP Fundraising Policy; • Ensuring compliance with the CDS Delegation of Authorities for Financial Administration of NPP and A-FN-105 NPP Accounting Policies; • Developing the NPP Fundraising Policy and supplemental guide relating to fundraising activities; • Liaising with key stakeholders on the fundraising policy issues; • Overseeing the fundraising certification training development; and • Maintaining a register of currently certified PAAs and AAs.
Senior VP PSP	<ul style="list-style-type: none"> • Supervising the delivery of day-to-day management of the National Personal Support Programs (PSP) Fundraising Program; • Appointing a PAA to conduct, manage and oversee all National PSP NPP fundraising activities; and • Maintaining a registry of NPP fundraising activities at the National level.
VP Corporate Services	<ul style="list-style-type: none"> • Oversight for all NPP Fundraising duties for Support Our Troops; • Appointing a PAA to conduct, manage and oversee all Support Our Troops fundraising activities; and • Maintaining a registry of NPP fundraising activities at the National level.
Principal Authorized Agents (PAA)	<ul style="list-style-type: none"> • Providing oversight of NPP fundraising activities including all units and satellite units supported by the Base/Wing; • Complete the requisite Fundraising training in order to obtain the AA certification; • Approving AAs; • Limiting and controlling the number of approved AAs; • Managing the AA team to include: ensuring proper accounting of donations and sponsorship revenue received, and ensuring all sponsors have completed Sponsor Support Agreements; and • Accessing/monitoring collaborations for donation/sponsorship fatigue.
Authorized Agents (AA)	<ul style="list-style-type: none"> • Soliciting and accepting fundraising revenue through donations and sponsorship on behalf of the Base/Wing

ANNEX B – NPP FUNDRAISING POLICY – RESPONSIBILITY TABLE

The	Is responsible for
	<p>Commander and Reserve Brigade/Region Commanding Officer in accordance with the NPP Fundraising Policy and CDS Delegation of Authorities for Financial Administration of NPP;</p> <ul style="list-style-type: none"> • Ensuring all Sponsor Support Agreements are completed for all sponsorship arrangements; • Complete the requisite Fundraising training in order to obtain the AA certification; and • Receiving the appropriate approval prior to soliciting and accepting donations and sponsorships.
Local NPP Accounting Office	<ul style="list-style-type: none"> • Managing and administering financial/comptrollership services including but not limited to financial records and the issuance of Income Tax Receipts; and • Ensuring all monies/product-in-kind received for any fundraising is recorded accurately in the NPP accounting system of record.
The Centre for Conflict Resolution and Ethics	<ul style="list-style-type: none"> • Providing advice to individuals who accept donations and sponsorship within CFMWS on ethical issues.

ANNEX C – NPP FUNDRAISING POLICY – FINANCIAL AUTHORITIES

Table 1 – Local NPP

Authority for	Managing Director NPP	Chief Operating Officer	Base/Wing/Ship/Small Unit Commander (Regular and Reserve Force)/Branch and Regimental Fund Chair	Base/Wing/Deployed Operations, Task Force Commander
Single Donation (from Defence Industry)	\$250K	\$100K	\$50K	\$25K
Single Sponsorship (from Defence Industry)	\$250K	\$100K	\$25K	\$15K
Single Donation to Support Our Troops	\$500K	\$250K	\$100K	\$50K
Single Donation or Sponsorship (from non-Defence Industry), RMCC, NAFMC	\$500K	\$250K	\$100K	\$50K
Acceptance of Single Donation or Sponsorship for 3 rd Party Purposes	\$500K	\$250K	\$20K	\$10K
Total Fundraising Activity (3 rd Party) - Sum of budgeted fundraising revenue	\$500K	\$250K	\$50K	\$25K

Table 2 – All Other NPP

Authority for	Managing Director NPP	Chief Operating Officer	Division Head	Divisional Delegate
Single Donation (from Defence Industry)	\$250K	\$100K	\$50K	\$25K
Single Sponsorship (from Defence Industry)	\$250K	\$100K	\$25K	\$15K
Single Donation to Support Our Troops	\$500K	\$250K	\$100K ¹	\$50K ¹
Single Donation or Sponsorship (from non-Defence Industry), RMCC, NAFMC	\$500K	\$250K	\$100K	\$50K
Acceptance of Single Donation or Sponsorship for 3 rd Party Purposes	\$500K	\$250K	\$20K	\$10K
Total Fundraising Activity (3 rd Party) - Sum of budgeted fundraising revenue	\$500K	\$250K	\$50K ²	N/A

¹ VP Corp Svcs Division only

² Snr VP PSP, VP Corp Svcs, and DMFS