



Policies and Standards for Charities - Revisions

April 1, 2020

A) OVERVIEW

Introduction

Added some brief wording on OCGA's role in supporting municipalities on their roles.

NEW (Additions in red)

The municipality continues to determine eligibility for participation and has the authority to determine the minimum number of assignments during a permit period for each charity. They will issue permits to eligible organizations for participation. They will also monitor the financial distribution of funds by the CGCA and the specific use of proceeds by each charitable organization. **OCGA works with OLG to provide support to municipalities on charity eligibility and approved use of proceeds.**

Role for Charities

Reworded to line up with existing legal framework and the, cGaming specific, Eligibility and Use of Proceeds policies. These wording changes are essentially a 'catchup' to current landscape.

OLD

The Criminal Code of Canada does not allow charities/not-for-profits to "conduct and manage" lottery events when technology is used. Hence, the introduction of technology has shifted the role of "conduct and manage" for all charitable gaming products from the individual charitable organizations to Ontario Lottery and Gaming. OLG, in turn, is contracting the day-to-day management of these products and the overall operation of the gaming facility to your Charitable Gaming Centre Service Provider. Charities are no longer responsible for the sale of gaming products, reconciliation of events, developing game schedules, advertising and promotion of games, or the handling of game cash.

Charities are required to have participation "Permits" issued by their municipalities. There is no longer a licence fee paid to the municipality for a licence. In lieu of individual licence fees, the municipality receives revenue from OLG for carrying out certain responsibilities including the issuing of permits. The OLG

currently uses the same requirements to obtain a Permit that are in the eligibility guidelines set out in the Alcohol and Gaming Commission of Ontario (AGCO) Lottery Licensing Policy Manual.

OCGA has negotiated, on your behalf, an agreement that maintains direct local funds for participating charities. In order to receive these funds, each charitable organization must provide services on-site at the Charitable Gaming Centre and in the local community as required. In order to maintain this important local funding model, it is critical that charities play a very visible and meaningful role in this initiative and are seen to be making a meaningful contribution to the operation.

NEW (Additions in red)

The Criminal Code of Canada does not allow charities/not-for-profits to “conduct and manage” bingo/break open ticket events when technology is used. Hence, the introduction of technology has shifted the role of “conduct and manage” from the individual charitable organizations to Ontario Lottery and Gaming. OLG, in turn, is contracting the day-to-day management of these products and the overall operation of the gaming facility to your Charitable Gaming Centre Service Provider. Charities are no longer responsible for the sale of gaming products, reconciliation of events, developing game schedules, advertising and promotion of games, or the handling of game cash.

Charities are required to have participation “Permits” issued by their municipalities. There is no longer a licence fee paid to the municipality for a licence. In lieu of individual licence fees, the municipality receives revenue from OLG for carrying out certain responsibilities which include determining eligibility, issuing of permits and ensuring the use of proceeds are within the guidelines set out in the Eligibility and Use of Proceeds document for cGaming.

OCGA has negotiated, on your behalf, an agreement that maintains direct local funding model for participating charities. In order to receive these funds, each charitable organization must provide services on-site at the Charitable Gaming Centre and in the local community as required. In order to maintain this important local funding model, it is critical that charities play a very visible and meaningful role in this initiative and are seen to be making a meaningful contribution to the operation.

Role for the Charitable Gaming Centre Association

Rewording just for clarity.

OLD

The CGCA also has an important administrative and financial role keeping records and managing the distribution of funds that belong to the member charitable organizations. The CGCA's role is that of an intermediary only and the CGCA does not have legal ownership of the Funds under its management. Under this model, financial and reporting tasks are substantially reduced.

NEW (Additions in red)

The CGCA also has an important administrative and financial role keeping records and managing the distribution of funds that belong to the member charitable organizations. The CGCA is **not the owner of these funds except for a small portion directed for administration**. Under this model, financial and reporting tasks **of the association** are substantially reduced.

B) CHARITABLE ORGANIZATIONS

1. Permit Application

Added reference to the cGaming Eligibility and Use of Proceeds document.

OLD

- a) Individual Charitable organizations must meet the eligibility requirements as determined by the OLG.

NEW (Additions in red)

- a) Individual Charitable organizations must meet the eligibility requirements as determined by **municipalities using OLG's "cGaming Eligibility and Use of Proceeds" policy document. This document is available from both the municipality and Charity Coordinator.**

3. Conflict of Interest

Added additional wording to help CGCA's mitigate issues or negativity involving volunteers.

OLD

- f) Bona Fide members that are being disruptive, abusive or are being an immediate detriment to the success of the gaming centre may be asked to leave immediately. In severe cases, the CGCA may remove the volunteer from the bona fide member list of an organization indefinitely.

NEW

- f) Bona Fide members that are being disruptive, abusive or are being an immediate detriment to the success of the **Charitable Gaming Centre** may be asked to leave immediately. **In severe cases or situations where the volunteer continues to be disruptive, including being negative on social media or in any other public audience, the CGCA may remove the volunteer from the approved bona fide member list of an organization indefinitely or permanently.**

4. Charity Assignments

Added the word 'consecutive' to the standard to clarify the intent. Also removed reference to volunteers participating in two assignments in the policy wording as it is covered in the standards (redundant).

OLD

- b) An individual bona fide volunteer may not execute roles and responsibilities for more than two assignments in one day except under B.11.f.

NEW

- b) An individual bona fide volunteer may not execute roles and responsibilities for more than two consecutive assignments in one day except under B.11.f.

6. Dress Code

Removed the provision where a logo on a nametag deemed the shirt as being charity logoed. This is to encourage more visibility of the identification of the charity and to avoid shirts with logos on stickers. As per existing policy, groups can use cGaming proceeds to purchase logoed clothing and are encouraged to invest in proper, professional, charity identifiable clothing.

Added wording for hats to include religious reasons.

Removed some wording on footwear to be more flexible.

OLD

Dress Item	Required	Not Permitted
Pants	Conservative, dark pants or skirts	Denim jeans, track pants, stretch pants, shorts, capris pants
Shirt	Collared shirt with charity logo (same colour for all volunteers preferred); or vest with charity logo and collared shirt underneath (all same colour preferred)	Tank tops, t-shirts, sleeveless shirts, scarves, sweaters, jackets, or anything that covers up the charity shirt or logo
Nametag	First name of volunteer. Acceptable nametags include embroidery on shirt, pin, lanyard, or sticker. If nametag also has a <u>highly visible</u> charity name / logo it is recognized as a logoed shirt	

Hat	Only if specifically related to the charity identification (e.g., Shriner’s Fez, Boy Scouts) or related to health reasons (e.g. cancer treatments)	Any other hat. Baseball caps specifically are not permitted as they distract from a professional look
Footwear	Footwear must be tasteful and appropriate to the role of the volunteer. CGCA’s must clearly define any restrictions on footwear in advance. Safety should be considered.	Flip-Flops/beach footwear/Crocs or similar footwear

NEW

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Shirt	Collared shirt with charity logo (same colour for all volunteers preferred); or vest with charity logo and collared shirt underneath (all same colour preferred)	Tank tops, t-shirts, sleeveless shirts, scarves, sweaters, jackets, or anything that covers up the charity shirt or logo
Nametag	First name of volunteer. Acceptable nametags include embroidery on shirt, pin, lanyard, or sticker.	
Hat	Only if specifically related to the charity identification (e.g., Shriner’s Fez, Boy Scouts) or related to religious or health reasons (e.g. cancer treatments)	Any other hat, baseball caps specifically, are not permitted as they distract from a professional look
Footwear	Footwear must be tasteful and appropriate to the role of the volunteer. Safety should be considered.	Flip-Flops/beach footwear/Crocs or similar footwear

7. Promoting Awareness of Charity Contribution

Removed standards e) and f) as they are no longer needed due to Charity Awareness and Engagement policy.

Removed reference to the obsolete Training and Resource manual. Added wording to reference Participation requirements in the Policies. Updated wording is in red text below.

OLD (Removed wording in green)

Charitable organizations are obligated to promote how the funds raised in the Charitable Gaming Centre support the good works they carry out in their community. It is expected that the charity presence is very evident in the Charitable Gaming Centre. This means that when a customer enters a Charitable Gaming facility they are immediately aware of the presence of charities and have opportunities to become informed as to how the funds raised in the Charitable Gaming Centre benefit the local community. This “charity look and feel” distinguishes Charitable Gaming Centres from other gaming facilities. *More information and examples can be found in the OCGA Revitalization of Charitable Bingo and Gaming Training and Resource Manual.*

Participating charitable organizations will also be required to promote and acknowledge their participation in Charitable Bingo and Gaming Initiative outside the Charitable Gaming Centre.

NEW (Additions in red)

Charitable organizations are obligated to promote how the funds raised in the Charitable Gaming Centre support the good works they carry out in their community. It is expected that the charity presence is very evident in the Charitable Gaming Centre. This means that when a customer enters a Charitable Gaming facility, they are immediately aware of the presence of charities and have opportunities to become informed as to how the funds raised in the Charitable Gaming Centre benefit the local community. This “charity look and feel” distinguishes a Charitable Gaming Centre from other gaming facilities.

Participating charitable organizations will also be required to promote and acknowledge their participation in Charitable Bingo and Gaming Initiative outside the Charitable Gaming Centre **as noted in the Charity Awareness and Engagement section of this document.**

8. Charity Awareness and Engagement

Renamed Participation Requirements to Charity Awareness and Engagement to avoid confusion with similar heading in CGCA contract. Moved from section 14 to immediately follow section 7 for better flow.

Added some wording to clarify that the promotion needs to impact the local community. Intention is to create local awareness and add long-term benefit to local charity revenues.

Consolidated wording on logo placement and added some addition examples.

OLD

Charitable Organizations must, at minimum complete two of the following participation requirements during a twelve-month period (established by the CGCA) Failure to comply within prescribed timeframes will result in financial and escalation policies outlined in B.11 and C.11 of the Policies and Standards and may result in removal from CGCA membership.

- Plan / participate in a charity event at the Charitable Gaming Centre
- Host an off-site cheque presentation with the CGCA (their AGM, event, etc.)
- Attend or host a photo-op / chq presentation / media event at the Charitable Gaming Centre
- Reference the Charitable Gaming Centre in Media Articles (Newspaper, Local News, etc.)
- Tag the Charitable Gaming Centre on Social Media posts
- Promote the Charitable Gaming Centre in publications (Newsletter)
- Charitable Gaming Centre logo / site recognition on the organization's website
- Charitable Gaming Centre logo on the organization's letterhead
- Charitable Gaming Centre logo on their materials (poster / brochure / program / etc.)

NEW (Additions in red)

Charitable Organizations must, at minimum complete two of the following requirements during a twelve-month period (established by the CGCA). **These must provide a local impact in the same community / audience as the charitable gaming centre.** Failure to comply within prescribed timeframes will result in financial and escalation policies outlined in B.11 and C.11 of the Policies and Standards and may result in removal from CGCA membership.

- Plan / participate in a charity event at the Charitable Gaming Centre
- Host an off-site cheque presentation with the CGCA (their AGM, event, etc.)
- Attend or host a photo-op / chq presentation / media event at the Charitable Gaming Centre
- Reference the Charitable Gaming Centre in Media Articles (Newspaper, Local News, etc.)
- Tag the Charitable Gaming Centre on Social Media posts
- Promote the Charitable Gaming Centre in publications (Newsletter)
- Charitable Gaming Centre logo placement
 - organization's website or letterhead

- materials (poster / brochure / program / etc.)
- on cheques given to other groups (service clubs)
- on buildings / vehicles
- outdoor advertising / signage
- etc.

13. Banking Requirements

Removed section (iv) on depositing OLG funds into the account due to redundancy with section (ii).

Reworded section (v) on transferring of funds (now section (iv) due to removal above) to give clarity and flexibility to municipalities.

OLD

- iv. Organizations are not permitted to transfer funds from the designated business account into another account. All approved expenses (as per the Permit) must be paid directly from the designated business account unless specifically permitted by the Municipality.

NEW

- iv. All approved expenses (as per the Permit) should be paid directly from the designated business account. Organizations are not permitted to transfer funds from the designated business account into another account unless specifically authorized by the Municipality.

Reworded section (f) on account closure to line up with section (a)(v) and the returning of funds to the CGCA for redistribution for consistency.

OLD

- a) If it is necessary to close the account due to the Permittee no longer participating in cGaming the Permittee must seek approval from the municipality on the disposition of the funds. Funds must be used for the approved purposes or donated to an approved organization for charitable purposes. A final report must be submitted to the Municipality

NEW

- a) If it is necessary to close the account due to the Permittee no longer participating in cGaming the Permittee must seek approval from the municipality on the disposition of the funds. Funds must be used for the approved purposes or donated to an approved organization for charitable purposes based on the dissolution clause of the organization. If this is not possible, the Municipality shall direct the funds be returned to the CGCA for distribution on a pro rata basis to

its current membership (e.g. Organization dissolution, change of objects and purposes). A final report must be submitted to the Municipality.

14. Reporting

Changed policy wording to better reflect the policy and not a standard within the policy.

OLD

Charitable organizations are required to submit Permit Reports to the municipality of the approved Use of Proceeds on a regular basis.

NEW

Charitable Organizations have a responsibility to complete and issue reports to various partners including the municipality, CGCA and OLG from time to time to ensure transparency and integrity of the cGaming initiative.

Added three new sections to the standards (sections e, f, and g) to ensure charitable groups are aware of the existing requirements under the municipal use of proceeds policies and record retention.

- e) Charitable Organizations are also required to provide the municipality, on request, additional information related to their eligibility and / or use of proceeds as outlined in “cGaming - Eligibility and Use of Proceeds” policies.
- f) The municipality may request a copy of its financial statements for the preceding year. These statements shall be prepared based on the requirements of the organization according to its legal structure (e.g. Corporations Act, Revenue Canada).
- g) Reports and records must be retained for at least 4 years. Organization may be required to retain records longer through other policy or legislation (e.g. Ontario’s Not-for-Profit Corporations Act, (ONCA) is six years).

C) CHARITABLE GAMING CENTRE ASSOCIATION

1. Contract and Incorporation

Removed reference to the obsolete Training and Resource manual.

3. Conflict of Interest

Added section (e) to add clarity on potential conflict with Charity Coordinators and their involvement in charitable groups in the community.

- e) Charity Coordinators and staff / contract resources of the CGCA are permitted to be involved with a charitable organization in the community. They are not permitted to be involved in anything with the organization related to cGaming (including volunteering at the Charitable Gaming Centre or completing cGaming reports on their behalf). All cGaming matters related to these organizations (scheduling, compliance, etc.) must be approved by the CGCA board.

4. Charity Coordinator

Added some wording to the policy to avoid conflict of interest. Charity Coordinators cannot also work for the Charitable Gaming Centre operator (CGCSP).

OLD

A Charity Coordinator must be engaged by the CGCA to assist the CGCA Board of Directors and charities in meeting their contractual obligations. This position may be full-time or part-time depending on the number of charitable organizations in the CGCA.

A primary focus is to provide ongoing training and support in the areas of building charity awareness and customer care. The Charity Coordinator's role includes providing support, oversight, and monitoring to ensure that charities are carrying out their full responsibilities. The Charity Coordinator assists the CGCA by providing a coordinated approach to promoting charitable organizations within a Charitable Gaming Centre and promoting how the funds benefit the local community. The Charity Coordinator also provides administrative support for the CGCA and in most cases the financial support. Financial tasks such as distribution of funds and financial reports may be carried out by the Charity Coordinator or by a separate contract person.

The Charity Coordinator is accountable to the CGCA Board of Directors and is required to work together with the OCGA and the team of Charity Coordinators across the province.

NEW (Additions in red)

A Charity Coordinator must be engaged by the CGCA to assist the CGCA Board of Directors and charities in meeting their contractual obligations. This position may be full-time or part-time depending on the number of charitable organizations in the CGCA.

A primary focus is to provide ongoing training and support in the areas of building charity awareness and customer care. The Charity Coordinator's role includes providing support, oversight, and monitoring to ensure that charities are carrying out their full responsibilities. The Charity Coordinator assists the CGCA by providing a coordinated approach to promoting charitable organizations within a Charitable Gaming Centre and promoting how the funds benefit the local community. The Charity Coordinator also provides administrative support for the CGCA and in most cases the financial support. Financial tasks such as

distribution of funds and financial reports may be carried out by the Charity Coordinator or by a separate contract person.

The Charity Coordinator is accountable to the CGCA Board of Directors and is required to work together with the OCGA and the team of Charity Coordinators across the province. **In order to avoid conflicts of interest the Charity Coordinator may not have an operational role with CGCSP.**

Small wording change to encompass existing and established role.

OLD

- b) The Charity Coordinator is the CGCA liaison between the OCGA, OLG, the municipality, and the CGCSP.

NEW (Additions in red)

- b) The Charity Coordinator is the CGCA liaison between the OCGA, OLG, the municipality, **the individual charities**, and the CGCSP.

Split section (c) into (c) and (d) and added some wording to further reinforce the importance and significant role of charity engagement and participation.

OLD

- c) The Charity Coordinator will work directly with the CGCA, OCGA, OLG, CGCSP, and the individual charitable organizations to develop and implement the promotion of charity awareness in the Charitable Gaming Centre and the community. The Charity Coordinator will ensure a high visibility of the charitable organizations with a well-defined charity area in the Charitable Gaming Centre. The Charity Coordinator is required to assist charities with technology to support their awareness initiatives within the Charitable Gaming Centre. e.g. producing DVDs and Power Point presentations.

NEW (Additions in red)

- c) The Charity Coordinator will work directly with the CGCA, OCGA, OLG, CGCSP, and the individual charitable organizations to develop and implement the promotion of charity awareness in the Charitable Gaming Centre and the community. **This is a core role of the Coordinator and includes attending charity meetings and events, supporting groups with the required Participation Requirements, media engagements, and education to local community leaders to highlight the contributions of the cGaming partnership to the community.**
- d) The Charity Coordinator will ensure a high visibility of the charitable organizations **which may include** a well-defined charity area in the Charitable Gaming Centre. The Charity Coordinator is required to assist charities with technology to support their awareness initiatives within the

Charitable Gaming Centre **and in the community**. e.g. producing DVDs and Power Point presentations.

Slight rewording for clarity on the requirement on tracking volunteers and the limit to three permitted charities to reflect the need to cross reference across locations.

OLD

- g) The Charity Coordinator is required to cross reference the bona fide member lists on record with the logbook to ensure that the members attending are listed as trained and are not carrying out assignments for more than three different individual charitable organizations in the site. Further cross checking may be needed where there are multiple Charitable Gaming sites in a municipality.

NEW

- h) The Charity Coordinator is required to cross reference the bona fide member lists on record with the logbook to ensure that the members attending are listed as trained and are not carrying out assignments for more than three different individual charitable organizations under permit in Ontario. Further cross checking may be needed where there are multiple Charitable Gaming sites in a municipality or geographical area.

Added two new standards to ensure both CGCA's and charities have access to the required documents and forms

- j) The Charity Coordinator shall have access to the OCGA file repository (cloud) and ensure the CGCA and Charitable Organizations are using the most current policies reports and forms from the repository.
- k) The Charity Coordinator shall make the most current reports, forms, and policies available to all organizations using an online platform (website, cloud, etc.).

Added three new standards to clarify the role of the coordinator as it related to monitoring and calculating shares and reductions on behalf of the association and clarity around bookkeeping resources. Removed section (m) as a result.

- o) The Charity Coordinator calculates monthly shares and reductions due to non-compliance.
- p) Follows the escalation process for non-compliance in the Policies and Standards.
- q) Will be responsible for the distribution of funds, providing financial reports to the municipality and the Board, and in most instances for the bookkeeping. If a separate bookkeeper is engaged, it should be noted that this requires approximately only 5-6 hours per month and should be reimbursed accordingly.

Changed some wording to strengthen the intent of the standard. Charity Coordinators should be an integral part of the majority of the board meetings.

OLD

- l) It is recommended that the Charity Coordinator be invited to attend Board meetings in order to report to the Board and be up to date on all issues and concerns.

NEW

- r) **Charity Coordinator should** be invited to attend Board meetings in order to report to the Board and be up to date on all issues and concerns.

Added some wording to include an in-centre office where possible, realizing this requires cooperation from the CGCSP.

OLD

- p) Charity Coordinators are required to spend a reasonable amount of time on site in the gaming centre so charities are familiar with them and have access to them and to also foster a positive relationship with the CGCSP and their staff. Where possible, consistent scheduled times in the centre are recommended.

NEW

- v) Charity Coordinators are required to spend a reasonable amount of time on site in the Charitable Gaming Centre so charities are familiar with them and have access to them and to also foster a positive relationship with the CGCSP and their staff. Where possible, **an in-centre office may be provided or minimally the Coordinator should have** consistent scheduled times in the Charitable Gaming Centre.

7. Training

Adding a requirement for in-centre training and other minor wording. These changes are also required to allow for future changes to volunteer training requirements.

OLD

- b) The CGCA must ensure that all volunteers attending assignments have been trained according to Policies and Standards (if possible in the Charitable Gaming Centre). The Charity Coordinator will conduct all training in order to ensure comprehensive and consistent training. A “train the trainer” method may not be used.
- c) The CGCA is required to use the material provided in the OCGA Training Manual. Materials will also be made available electronically for Charity Coordinators and CGCAs.

NEW

- b) The CGCA must ensure that all volunteers attending assignments have been trained according to Policies and Standards (This needs to include some time in the Charitable Gaming Centre). The Charity Coordinator will manage training requirements and track participation in order to ensure comprehensive and consistent training. A “train the trainer” method may not be used.
- c) The CGCA is required to use the material provided by OCGA. This may include written materials and in the future on-line materials. Materials will also be made available electronically for Charity Coordinators and CGCAs.

Adding a standard on retraining should it be required.

- e) Volunteers may be required to be retrained from time to time if training material or roles change significantly at the direction of OCGA.

8. Scheduling

Added standard to clearly clarify the maximum length of an assignment.

- a) An assignment shall be approximately two hours in length up to a maximum of 2.5 hours

Added standard to clearly clarify the limit on consecutive assignments. This was not clear but intend in previous policies but was worded related to the volunteers and not the charities.

- f) Charitable Organizations must not be scheduled for more than two consecutive assignments except under B.11.f.

9. Adding Charities

New section on adding charities based on direction and recommendations from OLG and the Provincial Government.

POLICY

The goal of this initiative is to provide opportunities to fundraising to as many organizations as possible and increase the overall benefit to the community. The OCGA will provide direction to CGCA's and recommendations to Municipalities on adding new charitable organizations as revenues and local conditions permit. OCGA will also work with all partners to actively recruit and promote cGaming to prospective new organizations where needed.

STANDARDS

- a) Municipalities have the authority to add new groups and give direction on the number of assignments issued to each organization
- b) The Charity Coordinator will modify the schedule to accommodate new groups as needed
- c) The Charity Coordinator will meet with all new organizations to provide orientation, documents and reports, and any onboarding required to participate at the Charitable Gaming Centre
- d) The CGCA and the Charity Coordinator will work cooperatively with the Municipality and OCGA

10. Financial

Added in a restriction on Charity Coordinators being signing authorities on the account to mitigate risk to the CGCA.

OLD

- b) The CGCA Business Account will hold Funds in trust for member charities and must be in the name of the CGCA and have four signing officers. These four bona fide members must administer the pooling of the CGCA charities disbursement. These bona fide members must represent four different individual charitable organizations of the CGCA. The designated business account (the “CGCA Pooling Account”) handles all funds related to the OLG distribution for charities.

NEW (Additions in red)

- b) The CGCA Business Account will hold Funds in trust for member charities and must be in the name of the CGCA and have four signing officers. These four bona fide members must administer the pooling of the CGCA charities disbursement. These bona fide members must represent four different individual charitable organizations of the CGCA. **Charity Coordinators may not be assigned as signing authorities on the account.** The designated business account (the “CGCA Pooling Account”) handles all funds related to the OLG distribution for charities.

Added standard on expenses and honorariums for Coordinators and board members. Restriction on honorariums is consistent with charity / volunteer policies.

- g) Reimbursement for out of pocket expenses for board members and the Charity Coordinator are permitted with sufficient substantiation subject to approval by two board members (receipts, mileage, etc.). Honorariums for board members are not permitted.

11. Distribution of Funds

Added timeframe for CGCA to complete the monthly distribution of funds in order to ensure a quick turnaround for the charities.

- c) The distribution of funds to the charities must be completed within 7 business days of receiving the transfer from OLG.

12. Withholding of Funds

Added a requirement that the principal contact in the organization be contacted to ensure delivery of the infraction is reaching the right individual.

OLD

- i. **First Infraction:** A designate from the CGCA will have a verbal discussion or written communication (may include email) with the charitable organization and attempt to resolve the problem(s). The communication must inform the group that this is step one of an escalating process and clearly explain the process and repercussions of further infractions and the communication must be documented. Financial repercussions must be applied as noted in B.11.c at the month-end distribution and reported on the monthly Distribution Report;

NEW (Additions in red)

- i. **First Infraction:** A designate from the CGCA will have a verbal discussion or written communication (may include email) **with the principal contact on file for the** charitable organization and attempt to resolve the problem(s). The communication must inform the group that this is step one of an escalating process and clearly explain the process and repercussions of further infractions and the communication must be documented. Financial repercussions must be applied as noted in B.11.c at the month-end distribution and reported on the monthly Distribution Report;

13. Reporting and Records

Added existing reporting timeframes from OLG requirements and a record retention standard for the CGCA.

- a) Monthly distribution reports are to be submitted to the municipality within 15 days following the end of the month in which the funds were received from OLG (Appendix D).
- j) Since the CGCA is a corporation, financial reports and records must be retained for at least 6 years as per Ontario's Not-for-Profit Corporations Act, (ONCA).

APPENDIX H

The definition of Bona Fide member was adjusted to bring it up to date with current environment and makes it easier for charities to provide bona fide members. If there is an Executive director and their Fundraising Coordinator or two teachers from a school or two case workers from a youth centre, this change will cover it. The reason for the initial policy was to curb members of convenience. That shift has happened. This change doesn't impact that very much if at all.

OLD

A paid employee from the charitable organization may be used for assignments providing this is not their primary role within the charitable organization and that the second bona fide member is a volunteer.

NEW

Paid employees from the charitable organization may be used for assignments providing this is not their primary role within the charitable organization.