



**Woodstock Hospital**  
**FOUNDATION**

Imagine Canada Ethical Code Program  
**Woodstock Hospital Foundation Best Practices**  
*Adopted December 15, 2009*

## Best Practices for Imagine Canada's Ethical Code Requirements

Woodstock Hospital Foundation is a proud adherent to the Ethical Code program of Imagine Canada. This document outlines how the Foundation complies with the specific requirements of the Code. The Best Practices document is made available to the public upon request.

### **Donor policies and public representations**

1. *The charity prepares and issues official Income Tax receipts for monetary gifts and for gifts-in-kind pursuant to any policy established and published on minimum amounts to be receipted and in compliance with all regulatory requirements. The charity will acknowledge in writing contributions not entitled to be officially receipted, subject to any policy established and published on minimum amounts to be acknowledged.*

**Woodstock Hospital Foundation:** All gifts are eligible for a tax receipt from Woodstock Hospital Foundation.

- Gifts of \$15 or more, received by mail, telephone or in person, receive a paper receipt, mailed within 10 business days
- Gifts that are given monthly or consolidated, receive a paper receipt at the conclusion of the calendar year by mid-February, latest.
- Gifts given as pledges at a fund raising event, will be receipted within 20 business days of deposit being made
- Gifts given in conjunction with a third-party event will be receipted within 20 business days of deposit being made
- Online donations are managed by Canada Helps, who receipts the donor

2. *All fundraising solicitations by or on behalf of the charity disclose the charity's name and the purpose for which funds are requested. Printed and on-line solicitations (however transmitted) will include its address or other contact information.*

**Woodstock Hospital Foundation:** All fundraising solicitations by or on behalf of Woodstock Hospital Foundation disclose the Woodstock Hospital Foundation name and the purpose for which funds are requested. Printed and on-line solicitations include the Woodstock Hospital Foundation logo and address.

3. *The charity provides the following information promptly upon request:*
  - *the charity's most recent annual report and financial statements as approved by the governing board*
  - *The charity's registration number (BN) as assigned by the Canada Revenue Agency (CRA)*
  - *Any information contained in the public portion of the charity's most recent Charity Information Return (form T3010A) as submitted to CRA*
  - *A copy of the Charity's Investment Policy relating to its investable assets, if applicable*
  - *A list of the names of the members of the charity's governing board*
  - *A copy of this Ethical Fundraising and Financial Accountability Code.*

**Woodstock Hospital Foundation:** Copies of all material listed above are available in print and electronic formats. Requests for these documents can be made by contacting the Foundation office at 519-421-4226

4. *The charity or those fundraising on its behalf will disclose, upon request, whether an individual or entity soliciting contributions is a volunteer, an employee or a contracted third party.*

**Woodstock Hospital Foundation:** All employees have photo identification badges and business cards. Campaign and/or third party fundraisers (e.g. direct dialogue) have official materials bearing the Foundation logo. Anyone can call the Foundation office to confirm if an individual is a legitimate volunteer fundraiser.

5. *The charity will encourage donors to seek independent advice if the proposed gift is a Planned Gift and/or the charity has any reason to believe that the proposed gift might significantly affect the donor's financial position, taxable income, or relationship with other family members.*

**Woodstock Hospital Foundation:** Our fundraising practices adhere to professional codes of conduct including those of the Association of Fundraising Professionals and the Canadian Institute of Chartered Accountants, and the Law Society of Ontario. In situations where Woodstock Hospital Foundation has reason to believe the proposed gift might significantly affect the donors' financial position, taxable income, or relationship with family members, the individual is encouraged to seek independent advice.

6. *The charity will honour donors' requests to remain anonymous in respect to:*
- *being publicly identified as a supporter of the organization; and/or*
  - *having the amount of their contribution publicly disclosed.*
- [Guidance: In some circumstances, when the source or size of a donation may be perceived as affecting the independence of the charity, the organization may negotiate the terms of public disclosure.]*

**Woodstock Hospital Foundation:** Woodstock Hospital Foundation does not identify or comment publicly on specific donor contributions without the expressed consent of the donor.

7. *The privacy of donors will be respected. Any donor records that are maintained by the charity will be kept confidential to the greatest extent possible. Donors have the right to see their own donor record, and to challenge its accuracy.*

**Woodstock Hospital Foundation:** Foundation employees sign employment agreements with confidentiality provisions as a condition of hire. Safeguards are in place to ensure that the information is not accessed, disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered. The Foundation also takes measures to ensure the integrity of this information is maintained and to prevent its being lost or destroyed. Individuals may access their personal information to ensure that it is correct and current.

The Foundation's privacy policy is available on request and is easily found on the Woodstock Hospital Foundation's web site: [www.wghfoundation.com](http://www.wghfoundation.com).

8. *If the charity exchanges, rents, or otherwise shares its fundraising lists with other organizations, a donor's request to be excluded from the list will be honoured.*

**Woodstock Hospital Foundation:** As part of our Privacy Policy, Woodstock Hospital Foundation does not sell, rent, or trade our donor lists.

9. *Solicitations by or on behalf of the charity will treat donors and prospective donors with respect. Every effort will be made to honour their requests to:*

- *limit the frequency of solicitations;*
- *not be solicited by telephone or other technology;*
- *receive printed material concerning the charity;*
- *discontinue solicitations where it is indicated they are unwanted or a nuisance.*

**Woodstock Hospital Foundation:** Foundation employees respond to all requests from donors and the general public. All requests are directed to the appropriate member of the fundraising team and/or are recorded in the donor's file. All complaints are handled in an appropriate and timely manner and a master complaint list is maintained.

10. *Recognition mechanisms created due to a gift will not be arbitrarily changed or withdrawn. Unless otherwise negotiated at the time of the gift or changed through a joint agreement between the charity and the donor or the donor's family or legal representative, the original form of the recognition mechanism should be maintained. If the mechanism cannot be physically retained, it will be changed to another consistent with the original agreement. If continuation of the recognition creates a reputational risk for the charity, it may be terminated or altered.*

*[Guidance: The charity's Donor Recognition/Gift Acceptance Policy may be referred to in a gift agreement and may define recognition time limits and/or establish procedures if maintaining the original form of recognition becomes impractical or undesirable.]*

**Woodstock Hospital Foundation:** Signed gift agreements are approved by all parties to the agreements and maintained in a central database as well as in the donor's file.

11. *The charity will respond promptly to a complaint by a donor or prospective donor about any matter that is addressed in this Ethical Fundraising and Financial Accountability Code.*

**Woodstock Hospital Foundation:** All inquiries about the participation of Woodstock Hospital Foundation in the Imagine Canada Ethical Code Program are directed to the Director of Development. Calls are returned within 3 business days.

## **Fundraising Practices**

1. *Fundraising solicitations on behalf of the charity will:*
- *be truthful; and*
  - *accurately describe the charity's activities and the intended use of donated funds.*

**Woodstock Hospital Foundation:** The mission of Woodstock Hospital Foundation is to inspire our community to invest in their local healthcare.

The Foundation embraces the following core values that together are reflected in the way we work toward our mission, with each other, and our community. These values were developed by Foundation staff and adopted by the Foundation's Board of Directors:

*Honesty and Integrity:* We commit to the highest standards of conduct and ethical practice in all of our endeavours.

*Accountability & Responsibility:* We demonstrate personal and collective accountability and responsibility in all of our programs and fulfill our promises to our stakeholders.

*Respect & Teamwork:* We are inclusive and supportive, both internally and externally, in our work together.

*Excellence & Innovation:* We create an environment where learning, initiative, and creativity flourish. We encourage innovation and manage risk in our pursuit of excellence.

*Diversity & Balance:* we respect and build upon individual differences and perspectives. We are sensitive to each other's and our personal, family and employment goals.

In order to maintain the trust of our communities, Woodstock Hospital Foundation must provide accurate, factual and consistent information about the work that we do. Therefore, fact-finding and fact-checking are core responsibilities of the Foundation. The following information is verified prior to finalizing documents and presentations:

- Facts, figures and appropriate representation of the hospital and foundation
- Phone number and address accuracy
- Mandatory privacy language
- Approval/consent from patients and staff with respect to use of stories, photos, etc. including release forms.

2. *The charity will not make claims that cannot be upheld. It will refrain from using marketing materials or making representations that could be misleading. The charity will not exploit its beneficiaries. It will be sensitive in describing those it serves (whether using graphics, images or text) and fairly represent their needs and how these needs will be addressed.*

**Woodstock Hospital Foundation:**

All claims and marketing materials are developed based on facts. Patient, donor or staff stories may be told through a variety of print and electronic media, such as publications, proposals, newsletters, brochures, websites, television and radio broadcasts. Staff, volunteers patients and families may also be called upon to act as spokespeople for media events or public events that require a personal story. All publications, stories or media events are provided in written form, for approval and sign off by the staff, volunteer, patient and/or family members. The Foundation is sensitive to the changing circumstances and will pull a story from circulation in order to respect an individual's wishes and privacy.

3. *When the charity conducts online solicitations its practices will be consistent with or exceed the provisions of the Canadian Code of Practice for Consumer Protection in Electronic Commerce, which is downloadable.*

**Woodstock Hospital Foundation:** The Director of IT is responsible for ensuring compliance with the Canadian Code of Practice. The Foundation engages in online promotion and marketing but does not participate in on-line solicitation.

4. *When the charity conducts face-to-face solicitations, including but not limited to door-to-door campaigns or street-side fundraising, its practices shall include measures to:*
  - *provide verification of the affiliation of the person representing the charity; and,*
  - *secure and safeguard any confidential information, including credit card information, provided by donors.*

**Woodstock Hospital Foundation:** All employees and relevant third party organizations sign agreements with confidentiality provisions in place to ensure that the information is not accessed, disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered. We also take measures to ensure the integrity of this information is maintained and to prevent its being lost or destroyed.

5. *Volunteers, employees and third party consultants/solicitors who solicit or receive funds on behalf of the charity shall:*
- *adhere to the provisions of this Ethical Fundraising and Financial Accountability Code;*
  - *act with fairness, integrity, and in accordance with all applicable laws;*
  - *adhere to the provisions of applicable professional codes of ethics, standards of practice, etc.;*
  - *cease solicitation of a prospective donor who identifies the solicitation as harassment or undue pressure, or who states that he does not wish to be solicited;*
  - *disclose immediately to the charity any actual or apparent conflict of interest or loyalty;*
  - *not accept donations for purposes that are inconsistent with the charity's objects or mission.*

**Woodstock Hospital Foundation:** A copy of the Ethical Code is referenced in appropriate publications. Where appropriate, Woodstock Hospital Foundation conducts training sessions to ensure a full understanding of the intent of the code.

6. *The charity will provide, upon request, its best available information on the gross revenue, net proceeds and costs of any fundraising activity (including the fundraising costs categorized as education and/or public awareness) it undertakes.*

**Woodstock Hospital Foundation:** Woodstock Hospital Foundation publishes a summary of its financial statements publically, in its newsletter. Audited financials are available April 30<sup>th</sup>, for the fiscal year ending on December 31<sup>st</sup>, upon request. To ensure the accuracy of any financial information, Woodstock Hospital Foundation provides information based on audited financials.

7. *The charity shall not, directly or indirectly, pay finder's fees, commissions or percentage compensation based on contributions.*

**Woodstock Hospital Foundation:** Woodstock Hospital Foundation adheres to the Imagine Canada Ethical Code program with regard to compensation of its staff and consultants. The Compensation Philosophy for the Foundation includes:

- compensation must be competitive in order to attract and retain highly competent staff
- compensation practices will be in keeping with the best practices for the management of a professional organization, with special reference to comparable philanthropic organizations in North America

The compensation philosophy is in place for the Foundation to achieve its business objectives of attracting and retaining talented fundraising staff while encouraging excellent performance at the both the organizational and employee level.

8. *Charities that undertake cause-related marketing in collaboration with a third party should disclose how the charity benefits from the sale of products or services and the minimum or maximum amounts payable under the arrangement. If no minimum amount is specified, the charity should disclose this.*

**Woodstock Hospital Foundation:** Woodstock Hospital Foundation will disclose this information upon request.

9. *The charity will not sell its donor list. If applicable, any rental, exchange or other sharing of the charity's donor list will exclude the names of donors who have so requested. If a list of the charity's donors is exchanged, rented or otherwise shared with another organization, such sharing will be for a specified period of time and a specified purpose and must be limited to what is allowed under Federal and/or Provincial privacy legislations.*

**Woodstock Hospital Foundation:** As part of our Privacy Policy, Woodstock Hospital Foundation does not sell, rent, or trade our donor lists.

10. *The charity's governing board will be informed at least annually of the number, type and disposition of complaints received from donors or prospective donors about matters that are addressed in this Ethical Fundraising and Financial Accountability Code.*

**Woodstock Hospital Foundation:** will reports any complaints received to the Board of Directors at the board meeting, immediately following the complaint.

### **Financial practice and transparency**

1. *The charity's financial affairs will be conducted in a responsible manner, consistent with the ethical obligations of stewardship and all applicable law.*
2. *All donations will be used to support the charity's objects, as registered with CRA.*
3. *All restricted or designated donations will be used for the purposes for which they were given unless the charity has obtained legal authorization to use them for other purposes. Alternative uses will be discussed where possible with the donor or the donor's legal designate. If the donor is deceased or legally incompetent and the charity is unable to contact a legal designate, the donation will be used in a manner that is as consistent as possible with the donor's original intent. If necessary, the charity will apply to the courts or the appropriate regulatory body to obtain legal authorization to use the donation for other purposes.*
4. *Annual financial reports are necessary to achieve transparency and accountability to donors and the public. All charities issuing receipts should produce them and make them easily accessible. They should:*
  - *be factual and accurate in all material respects;*
  - *disclose the gross amount of fundraising revenues (receipted and non-receipted);*
  - *disclose the total amount of fundraising expenses (including salaries and overhead costs);*
  - *disclose all donations that are receipted for income tax purposes;*
  - *disclose the total amount of expenditures on charitable activities (including gifts to other charities);*
  - *segregate undesignated and designated funds (for aggregate amounts over \$100,000);*
  - *identify government grants and contributions separately from other donations (for aggregate amounts over \$100,000); and*
  - *Financial Statements should be prepared in accordance with generally accepted accounting principles and standards established by the Canadian Institute of Chartered Accountants, in all material respects (or disclose a discrepancy between the practice and GAAP).*

**Woodstock Hospital Foundation:** The Finance & Investment Committee of the Board of Directors is responsible for monitoring and reporting to the Board of Directors with respect to all matters pertaining to the financial integrity of the Foundation. The Committee:

- monitors the ongoing financial and operating performance of the Foundation

- Reviews with management any emerging practices or legislation that may materially impact the financial performance of the Foundation.
- Bi-annually reviews any strategic and long-range forecasts, and makes recommendations to the Board of Directors with respect thereto.
- Ensures that management has appropriate internal controls in place including policies and procedures to manage the assets and operations of the Foundation.
- Makes recommendations to the board of directors and through them to the members at the Annual General Meeting with respect to the appointment of external auditors.
- Examines other matters as may be assigned by the board from time to time.

The Board of Directors:

- Reviews business cases of new significant foundation activities prior to their going to the board for approval.
- Reviews the annual financial statements of the Foundation together with the External Auditor's report.
- Meets with the auditors at least annually; approve fees and the scope of their external audit plan.

Woodstock Hospital Foundation Financial Information included in the Annual Report and Financial Statements have been prepared by management in accordance with Canadian generally accepted accounting principles, and are audited and signed by an independent accounting firm. The financial summary includes all the information as outlined above. An overview of the Woodstock Hospital Foundation annual report is available on line at [www.wghfoundation.ca](http://www.wghfoundation.ca) and a complete copy is available upon request by calling the Foundation office at 5189-421-4226.

5. *The cost-effectiveness of the charity's fundraising programs will be reviewed regularly by the governing board. No more will be spent on administration and fundraising than is required to ensure effective management and resource development. The charity will disclose its process for evaluating its spending.*

**Woodstock Hospital Foundation:** The Foundation maintains systems of internal accounting and administrative controls of high quality, consistent with reasonable cost. Such systems are designed to provide reasonable assurance that the financial information is relevant, reliable, accurate and complete, in all material respects, and that the Foundation's assets are appropriately accounted for and adequately safeguarded. The Board of Directors is responsible for ensuring that management fulfills its responsibilities for financial reporting and is ultimately responsible for reviewing and approving the financial statements. The Board carries out this responsibility principally through its Finance & Investment Committee, whose members are appointed by the Board. Each year, the Foundation engages in a detailed planning process. The assumptions used for revenue and expense plans vary for each individual fundraising program. Each program submits detailed plans which are evaluated based on incremental improvements in both revenue and expenses. A detailed budget is reviewed and approved by our Board of Directors prior to the beginning of each fiscal year. Monthly operating statements track the performance, by fundraising program. Overall performance is measured against the budget. The Foundation takes the additional step of having its public filings with revenue agencies formally reviewed by an external accounting firm whenever there is a material change to the filing requirements. This process is undertaken to ensure the filings by Woodstock Hospital Foundation are accurate and in full compliance with the intent of tax legislation.

6. *The charity will, upon request, disclose the revenue and expense assumptions for its fundraising activity as approved by its Board in its annual budget.*

**Woodstock Hospital Foundation:** In order to ensure responsible stewardship of its fundraising, investment and granting responsibilities, the Woodstock Hospital Foundation will respond to requests regarding its best available information on the gross revenue, net proceeds and costs of any fundraising activity (including the fundraising costs categorized as education and/or public awareness) as follows:

- Imagine Canada Ethical Code Request Form: As part of our reporting responsibility to the Woodstock Hospital Foundation Board of Directors, we are required to prepare an annual report of all inquiries pertaining to the Ethical Code, and therefore, we require all requests for information to be submitted in writing.
- Proprietary information: The information shared will include a confidentiality notice that states – due to the sensitive nature and potential for misinterpretation, this information is intended for your exclusive use and is not to be copied, disclosed, distributed or reproduced in any way. Woodstock Hospital Foundation reserves the right to consider certain material proprietary and not for public distribution
- Financial information to be disclosed is audited revenues, expenses and net proceeds for fundraising programs. The audited financial information will be available on April 30<sup>th</sup> following the filing of the Foundation’s T3010 with the Canada Revenue Agency, following the completion of its fiscal year, ending December 31.

7. *If the charity has annual revenue in excess of \$250,000, the financial statements are audited by an independent public accountant.*

**Woodstock Hospital Foundation:** Woodstock Hospital Foundation Financial Information included in the Annual Report and Financial Statements have been prepared by management in accordance with Canadian generally accepted accounting principles and are audited and signed by an independent accounting firm appointed by the Foundation’s Board of Directors.

8. *If the charity’s investable assets surpass \$1,000,000, an Investment Policy will be established setting out asset allocation, procedures for investment decisions, and asset protection issues.*

**Woodstock Hospital Foundation:** The Foundation’s Statement of Investment Policies and Objectives governs the investment management of the Foundation’s finances and is intended to provide guidance to investment advisors.

Funds to be invested by the Board include all funds, endowment funds and restricted and unrestricted charitable gifts.

The primary investment objectives of the are;

- to preserve the capital
- to attain an average real total return
- to comply with the required disbursement quota as determined by Revenue Canada
- to allow for the distribution of endowment funds, according to policy and
- to support the needs of the hospital, upon Board approval

The investment philosophy currently selected by the Investment Committee and approved by the Board is the long-term, value-oriented approach as described below:

Portfolio Asset Mix:	Range (%)
Equity	0% - 30% ** (Max of 50% international)
Fixed Income (bonds & cash)	70% - 100%

9. *If the charity receives, or anticipates receiving, gifts-in-kind of \$100,000 or more in a year and has annual revenue in excess of \$500,000, it will establish a Gift Acceptance Policy (including valuation issues) for the receipt of gifts-in-kind.*

**Woodstock Hospital Foundation:** All donations to the Woodstock Hospital Foundation are receipted, acknowledged and disbursed by the Foundation.

Gifts include cash, securities, gifts-in-kind, and planned gifts such as bequests, life insurance and annuities, etc.

Gift acceptance policies have been prepared by the Foundation that are in keeping with accepted accounting principles and Revenue Canada guidelines.

In order to be receipted, all arrangements for acceptance of gifts-in-kind must be made through the Foundation in accordance with Canada Revenue Agency guidelines.

### **Gifts-In-Kind**

The Woodstock Hospital Foundation may accept and/or solicit gifts of tangible property (Gifts-in-Kind) on behalf of the Woodstock General Hospital.

Tangible Property is defined as non-monetary material donations, such as works of art, real estate, life-insurance, etc. It does not include sponsorship for events (promotion/advertising) or an individual's time/wages (volunteer hours).

Gifts in kind shall be accepted only with the approval of the Foundation Chair or his/her designate.

Gifts in kind will be receipted according to the following criteria:

1. If the gift is equipment, it must be deemed acceptable to the Hospital in order to be received as a gift of tangible property. All medical and/or electrical equipment must meet CSA standards and be approved by the Hospital and/or the department for which it is intended.
2. All approved gifts with a value of \$1,000 or more must be accompanied by an independent appraisal to establish the true value of the gift. The cost of the appraisal is the responsibility of the donor. The Foundation reserves the right to solicit an additional, independent appraisal, at its expense, prior to accepting the gift.
3. The donor will be paid the appraised value for the gift and, at the same time, the donor will pay the Foundation a like amount as a donation (cheque exchange).
4. An official tax receipt shall not be issued, until the cheque exchange is complete and money is received by the Foundation.
5. In circumstances where there are on-going donations of gifts in kind, the cheque exchange process need not occur with each donation. Upon agreement with the donor, the cheque exchange and receipting may be done on an annual basis.
6. Receipting will be in accordance with the Policy on Receipting Donations