

Charities Directorate
Canada Revenue Agency
Ottawa, Ontario, K1A 0L5
c/o consultation-policy-politique@cra-arc.gc.ca

Thursday, November 24, 2016

Re: Political Activities Consultation

I am writing on behalf of **St. Stephen's Community House**, a multi-service charity in downtown Toronto working with 20,000 of the most vulnerable members of our community. Our goal is to help individuals and families to get out of poverty permanently through child care, employment, housing, settlement services, and justice programming. We also support people in poverty to share their lived experience to make necessary changes in our society to reduce poverty and barriers to success. (Please visit our website at www.sschto.ca)

Our organization is one of the 3% of charities that report on political activities (we agree with Imagine Canada that it is a misleading term as we do not do partisan activities). We strongly feel that it is our essential charitable duty to engage with government and the public on the root causes of poverty and the policy impacts that result in social inequality. We do deputations to all levels of government, we do community-based research to identify community problems & solutions, and we engage in social action to raise awareness of these problems & solutions. (Please see our Community Development & Social Action Newsletter <http://www.sschto.ca/About-Us/Social-Action/CDSA-Newsletters>). This is not secondary to our work, but a profound duty that we have because we have access to the information and experience of our participants that government and the public in general do not. We do charitable works and we provide vital insight to the community for the public good.

We are writing to express support for Imagine Canada's [political activities brief](#). Their recommendations were created with the assistance and support of many organizations of varying type, size and scope, from across the country. We strongly support the key recommendation of Imagine Canada that the *Income Tax Act* be amended to restore an emphasis on charitable purposes, rather than regulating how charities achieve those purposes. We support a broad legal and regulatory reform of the charitable and nonprofit sector. We agree with Imagine Canada's recommendations about clarifying definitions and scope regarding *partisan political activity* so that we can be more confident in communicating with key decision-makers in our community.

Thank you for this consultation on political activities of charitable organizations. We encourage the federal government to recognize the critical role played by Canada's nonprofits and charities and to ensure regulation governing the charitable sector provides an enabling environment for us in serving our communities and communicating effectively with the media and the public.

Please feel free to contact me at sbill@sschto.ca
Sincerely,



Bill Sinclair
Executive Director

cc: Ontario Nonprofit Network via info@theonnc.ca
Hon. Adam Vaughan MP
Hon. Chrystia Freeland MP
Hon. Carolyn Bennett MP