



## **Empowering Your Mission: An AI Use Policy Toolkit for Canadian Non-Profits**

### **Section 1: The AI Imperative for Canadian Non-Profits: Why Act Now and Responsibly?**

Artificial intelligence (AI) is rapidly transitioning from a futuristic concept to a present-day reality, fundamentally reshaping how organizations across all sectors operate

and deliver value. For Canadian non-profits, AI presents a spectrum of compelling opportunities to enhance their missions, streamline operations, and deepen their engagement with the communities they serve. However, this transformative potential is accompanied by a critical need for thoughtful, responsible adoption. This section explores the compelling reasons why Canadian non-profits must engage with AI strategically and why establishing a comprehensive AI Use Policy is an urgent imperative.

#### **The Transformative Potential of AI for Social Impact**

AI technologies offer a powerful suite of capabilities that can significantly amplify the impact of non-profit organizations. From automating routine administrative tasks to providing sophisticated data analysis for enhanced decision-making, AI can help non-profits achieve more with often limited resources.<sup>1</sup> For instance, AI can be employed to improve client service delivery through intelligent chatbots providing real-time support, or by personalizing outreach to beneficiaries based on their specific needs and histories.<sup>1</sup> In fundraising, AI can unlock new efficiencies through donor analytics, enabling more targeted campaigns and personalized communication strategies.<sup>2</sup> Operationally, AI tools can automate tasks such as transcribing meeting minutes, analyzing program data for insights, and processing applications, thereby freeing up valuable staff time for more direct, mission-focused work.<sup>1</sup> As one analysis notes, AI can act as a "virtual assistant and co-writer," helping non-profits work smarter, reach more individuals, and ultimately make a greater societal impact.<sup>3</sup> The potential for AI to enhance decision-making by analyzing vast datasets, improve operational efficiency, and foster better stakeholder engagement is particularly profound for organizations striving to achieve significant social good on constrained

budgets.<sup>1</sup>

### **The Urgency: Why Non-Profits Can't Afford to Ignore AI**

Despite the clear potential of AI, adoption rates within the Canadian non-profit sector remain notably low. As of early 2024, reports indicated that only about 4.8% of Canadian non-profits were utilizing AI, with fewer than 1% of non-profit staff in technology-related roles.<sup>2</sup> This stands in contrast to the broader Canadian business landscape, where 83% of IT decision-makers reported progress in executing their AI strategies in 2024.<sup>5</sup> This disparity highlights a significant opportunity gap; while interest in AI is growing within the non-profit sector, a proactive approach is needed to bridge this divide.

The implications of not engaging with AI are considerable. AI is no longer a distant technological frontier but is rapidly "permeating local institutions".<sup>2</sup> Non-profits that delay in exploring and adopting AI risk falling behind in terms of operational efficiency, fundraising effectiveness, and their ability to innovate in service delivery. This can, in turn, impact their overall relevance and capacity to meet the evolving needs of their communities. Recognizing this challenge, initiatives such as the federal government-backed Responsible AI Adoption for Social Impact (RAISE) program have been launched to build AI capacity within the Canadian non-profit sector, underscoring the recognized need for support in this area.<sup>2</sup> The very existence of such programs signals that the challenge is not merely access to tools, but a deeper need for skills, knowledge, and strategic guidance to effectively leverage AI.

Furthermore, the expectations of stakeholders—including donors, beneficiaries, and the general public—are increasingly being shaped by their interactions with AI in other areas of their lives. These stakeholders are becoming accustomed to the personalized and efficient experiences that AI can enable. Non-profits that fail to adapt may find it harder to engage these audiences, maintain their trust, and secure necessary funding. Innovative uses of AI, such as Toronto's Furniture Bank using AI-generated images to illustrate the issue of furniture poverty, demonstrate how technology can be harnessed to connect with stakeholders in new and compelling ways.<sup>2</sup> Thus, the urgency for AI adoption is driven not only by internal operational benefits but also by the evolving external landscape and the need to maintain relevance and impact.

### **The Critical Need for an AI Use Policy: Navigating Opportunities and Mitigating Risks**

As non-profits begin to explore and implement AI technologies, the development of a clear, comprehensive AI Use Policy becomes an indispensable tool for navigating this

new terrain responsibly.<sup>2</sup> Such a policy serves as a foundational guide, enabling organizations to harness the benefits of AI while proactively managing its inherent risks. Non-profits often handle highly sensitive personal data and serve some of society's most vulnerable populations.<sup>2</sup> The improper use of AI in this context—whether through flawed algorithms, data misuse, or biased decision-making—can lead to serious ethical missteps, significant privacy breaches, and direct harm to clients.<sup>2</sup>

A robust AI policy acts as a vital safeguard against these potential pitfalls, helping to protect vulnerable communities and build and maintain the public trust that is paramount in the non-profit sector.<sup>2</sup> It demonstrates an organization's commitment to responsible innovation and ethical practice. Moreover, Canada's regulatory landscape for AI, while still evolving, points towards increasing obligations for organizations using AI.<sup>2</sup> Even with the termination of the proposed federal Artificial Intelligence and Data Act (AIDA)<sup>8</sup>, the underlying principles of responsible AI—such as privacy, fairness, and accountability—are already embedded in existing Canadian laws like the Personal Information Protection and Electronic Documents Act (PIPEDA) and various Human Rights Acts.<sup>2</sup> Guidelines from the Office of the Privacy Commissioner of Canada (OPC) and tools like the Ontario Human Rights Commission's (OHRC) Human Rights AI Impact Assessment further underscore the current applicability of these principles to AI systems.<sup>2</sup> For example, privacy compliance is a cornerstone, and non-profits must adhere to existing privacy laws when AI systems handle personal data; guidance from provincial privacy commissioners has emphasized that these duties apply even in the absence of AI-specific legislation.<sup>2</sup>

Therefore, an AI Use Policy is not merely about preparing for future regulations; it is about ensuring compliance with current legal and ethical standards today. It allows non-profits to confidently and strategically seize AI's benefits for social good, mitigate risks related to discrimination, intellectual property infringement, and operational errors<sup>7</sup>, and demonstrate leadership in the ethical use of technology.<sup>2</sup> Ultimately, an AI Use Policy frames AI adoption not as a purely technical endeavor, but as a strategic imperative deeply intertwined with an organization's mission, values, and obligations to the communities it serves.

## **Section 2: Core Principles for Your Non-Profit's AI Journey**

An AI Use Policy for a Canadian non-profit organization should be built upon a foundation of core principles that reflect a steadfast commitment to ethical, responsible, and mission-aligned AI adoption. These principles serve as the ethical compass guiding all AI-related activities, ensuring that technology is harnessed in a

manner that upholds the organization's values and the trust placed in it by stakeholders. The following principles, drawn from best practices and the unique context of the non-profit sector, are fundamental to this journey.<sup>2</sup>

**Human-Centered Use:** At its heart, non-profit work is about people. Therefore, AI should always be treated as an assistive tool designed to enhance and augment human capabilities, creativity, and connection, not to replace them.<sup>2</sup> AI systems should empower staff to perform their roles more effectively and enable clients to access services and support more readily, without diminishing human agency, empathy, or the critical role of human judgment in decision-making. As exemplified by Furniture Bank's AI manifesto, AI is a support, not a substitute, for human creativity and storytelling.<sup>2</sup>

**Ethical Content Generation:** The rise of powerful generative AI tools presents both opportunities and significant ethical responsibilities, particularly for non-profits that represent and communicate about vulnerable individuals. While AI-generated images or text can be ethically used to illustrate broad societal issues or concepts (such as Furniture Bank's campaign on furniture poverty<sup>2</sup> or CanadaHelps' suggestion to use AI images to sidestep privacy concerns<sup>11</sup>), the policy must explicitly ban the use of AI to create images or videos that depict real clients or to replace authentic photographs and personal stories.<sup>2</sup> This principle is crucial for safeguarding the dignity of individuals, preventing misrepresentation, and maintaining authenticity in all communications. The ease of access to generative AI tools<sup>12</sup> makes this principle particularly acute, as the potential for misuse, such as creating deepfakes or infringing on intellectual property, is a growing concern.<sup>7</sup>

**Transparency and Accountability:** Building and maintaining trust is paramount for non-profits. This requires a commitment to openness and honesty regarding the use of AI. Organizations should pledge to transparently inform stakeholders—clients, donors, staff, and the public—about how and when AI is being used in campaigns, operations, and service delivery.<sup>2</sup> This includes fostering an organizational culture where staff are encouraged to explore AI's creative potential but are always guided by the values of transparency and accountability.<sup>2</sup> While the technical intricacies of some AI systems can be opaque (the "black box" problem)<sup>2</sup>, the focus for non-profits should be on *functional* transparency. This means being able to explain in understandable terms the purpose of an AI system, the general logic it employs, the types of data it uses, and the nature of its outputs, especially when these outputs affect individuals.<sup>2</sup> This aligns with the expectation that individuals have a right to an explanation for AI-driven decisions that impact them.

**Fairness and Non-Discrimination:** AI systems learn from data, and if that data reflects existing societal biases, the AI can inadvertently perpetuate or even amplify these biases, leading to unfair, unequal, or discriminatory outcomes.<sup>2</sup> This is a critical risk for non-profits dedicated to equity and serving diverse and vulnerable populations. Therefore, a core principle must be the active and ongoing effort to mitigate algorithmic bias.<sup>2</sup> AI systems should be developed, selected, and deployed in a manner that aligns with Canadian human rights standards and actively seeks to prevent unintended discrimination.<sup>14</sup>

**Data Privacy and Security:** Non-profits are custodians of sensitive personal information related to their clients, donors, and staff. AI systems are often data-intensive, heightening the importance of robust data protection practices. The policy must explicitly commit the organization to adhering to all applicable Canadian privacy laws, such as PIPEDA and equivalent provincial legislation, whenever AI systems collect, use, or manage personal data.<sup>2</sup> This includes ensuring strong security measures to protect AI systems and the data they process from breaches or unauthorized access.<sup>14</sup>

**Mission Alignment:** Every AI initiative undertaken by a non-profit should be clearly and demonstrably linked to its core mission and values. Technology adoption, including AI, should not be an end in itself but a means to achieve greater social impact.<sup>2</sup> As advised by sector experts, non-profits should "determine their core vision and outcomes first" and use these as the guiding rails for integrating AI.<sup>2</sup> This principle acts as a critical filter, ensuring that the pursuit of efficiency or innovation through AI does not inadvertently undermine the organization's human-centric approach or lead to outcomes that are misaligned with its fundamental purpose. Regularly evaluating AI deployments for their contribution to mission outcomes and community benefit is essential.

**Integrating Principles into Organizational Culture:** These principles cannot exist merely on paper; they must be woven into the fabric of the organization's culture. This requires strong leadership commitment, ongoing education and training for staff and volunteers, and the creation of spaces for open dialogue about the ethical dimensions of AI use.<sup>2</sup> Encouraging staff to learn and adapt under the guidance of these clear principles, rather than through overly rigid rules, fosters a culture of responsible innovation.<sup>2</sup>

By embedding these core principles into their AI journey, Canadian non-profits can navigate the complexities of this transformative technology with integrity, ensuring that AI serves as a powerful force for good, amplifying their mission and benefiting

the communities they are dedicated to serving.

## **Section 3: Building Your AI Use Policy: A Step-by-Step Framework**

Developing a comprehensive AI Use Policy is a foundational step for any non-profit organization looking to leverage artificial intelligence responsibly. This section outlines a step-by-step framework, detailing the essential components that such a policy should address. This framework is informed by Canadian guidelines, best practices, and the unique operational context of non-profit organizations.<sup>2</sup> The components are interconnected, forming a holistic approach to AI governance.

### **3.1. Introduction and Purpose of the AI Policy**

The policy should begin with a clear and concise introduction that outlines its fundamental purpose. This includes:

- **Stating Objectives:** Clearly articulate what the policy aims to achieve, such as guiding the ethical and responsible use of AI, ensuring compliance with legal and regulatory obligations, protecting stakeholders, and aligning AI initiatives with the organization's mission and values.
- **Defining Scope:** Specify which AI applications, tools, and uses are covered by the policy. This could range from generative AI tools used for content creation to AI-powered analytics for program evaluation or client intake systems.
- **Identifying Applicability:** Define who within the non-profit the policy applies to – for example, all staff, volunteers, contractors, and board members who may interact with or deploy AI systems on behalf of the organization.
- **Linking to Mission and Values:** Explicitly connect the policy to the non-profit's overarching mission and core values, reinforcing that AI is a tool to be used in service of these guiding principles.<sup>2</sup>

This introductory section sets the tone and context for the entire policy, emphasizing its importance as a strategic enabler rather than a restrictive document.

### **3.2. Upholding Fairness, Equity, and Non-Discrimination**

AI systems have the potential to inherit and amplify biases present in the data they are trained on, which can lead to unfair or discriminatory outcomes.<sup>2</sup> This is a particularly acute risk for non-profits serving diverse and vulnerable populations, as biased AI could inadvertently disadvantage certain groups or undermine equity goals.<sup>15</sup> Specifically highlighting how mainstream AI, often grounded in Western epistemologies, can perpetuate biases against priority populations, including

Indigenous peoples and racialized communities, by neglecting diverse knowledge systems and perspectives.

### **Policy Strategies:**

- **Bias Audits & Impact Assessments:** The policy should mandate regular reviews and audits of AI systems to identify and mitigate potential biases. This includes conducting Algorithmic Impact Assessments (AIAs) or Human Rights AI Impact Assessments (HRIAs), particularly for AI systems deemed high-impact (i.e., those significantly affecting access to services, resources, or opportunities).<sup>2</sup> The Ontario Human Rights Commission's (OHRC) HRIA is a valuable tool for Canadian non-profits to proactively identify, assess, and mitigate biases and discriminatory impacts.<sup>2</sup> This tool provides a structured approach to evaluating AI systems against human rights principles.
- **Diverse & Inclusive Design and Procurement:** To counteract inherent biases, the policy should advocate for the involvement of diverse stakeholders—including staff from various backgrounds, individuals with lived experience, and clients—in the selection, design, development, and testing phases of AI solutions.<sup>2</sup> This inclusive approach can help surface potential biases and ensure that AI tools are appropriate and effective for all communities served.<sup>15</sup> emphasizes the need for diverse AI frameworks and intersectoral collaboration to promote equity.
- **Anti-Discrimination Safeguards:** The policy must explicitly state that all AI systems used by the organization must comply with Canadian human rights laws and shall not intentionally or systematically disadvantage individuals based on protected grounds (e.g., race, gender, disability, religion). It should outline a clear process for addressing and correcting any discovered biases, which might involve retraining AI models with more representative data or adjusting algorithmic parameters.
- **Human-in-the-Loop for Critical Decisions:** A crucial safeguard is maintaining a "human-in-the-loop" approach for all significant decisions that impact individuals, especially those related to service eligibility, resource allocation, or client well-being.<sup>2</sup> While AI can provide valuable analysis and recommendations, final determinations in critical areas should always be subject to human review, interpretation, and the ability to override AI-driven suggestions when fairness or specific circumstances warrant. This principle was also a consideration in the (now defunct) federal AIDA legislation, which aimed to address "biased output".<sup>10</sup>

### ***Checklist for Bias Assessment (Adapted from HRIA Principles)***

HRIA-Inspired Checkpoint	Considerations for Non-Profits
<b>1. Purpose &amp; Context of AI System</b>	What is the intended purpose? Who will be affected? Are there vulnerable groups involved? Is the AI replacing or augmenting a human function?
<b>2. Data Inputs &amp; Training Data</b>	Is the data representative of the target population? Are there known biases in the data sources? How is data quality ensured? Are protected grounds included?
<b>3. Algorithmic Processing &amp; Logic</b>	Is the general logic understandable? Are there proxies for protected grounds? How are fairness metrics defined and measured?
<b>4. Outputs &amp; Decision-Making</b>	How are outputs used? Can outputs be explained? What is the impact of an incorrect output? Is there a human review process for critical decisions?
<b>5. Potential for Adverse Impacts &amp; Discrimination</b>	Could the AI system lead to differential treatment based on protected grounds? Does it create or exacerbate existing inequalities?
<b>6. Accessibility &amp; Accommodation</b>	Is the AI system and its outputs accessible to people with disabilities? Does it accommodate diverse needs?
<b>7. Mitigation Strategies</b>	What steps are being taken to identify, monitor, and mitigate bias and discrimination? Is there a process for redress if harm occurs?
<b>8. Consultation &amp; Engagement</b>	Have affected communities and diverse stakeholders been consulted in the design, development, or deployment of the AI system?

### 3.3. Ensuring Transparency with All Stakeholders

The complexity of AI systems can often lead to an "opacity problem," where stakeholders are unaware of when AI is being used or how it arrives at its

conclusions.<sup>2</sup> This lack of transparency can erode trust, a critical asset for non-profits.

### **Policy Strategies:**

- **Disclosure of AI Use:** The policy should mandate clear and unambiguous disclosure whenever AI is interacting directly with individuals (e.g., a chatbot on a website should identify itself as AI-powered) or when AI significantly influences decisions affecting them.<sup>2</sup> If AI is used to generate content, such as reports or social media posts, an accompanying statement (e.g., "This image was generated with AI assistance") should be considered.<sup>2</sup>
- **Explainability of Decisions:** For AI systems that influence decisions about people, especially in high-stakes situations, the organization must be prepared to provide explanations in plain, understandable language.<sup>2</sup> Individuals have a right to understand the basis of AI-driven conclusions and should have access to a human review process to challenge or seek clarification on such decisions.<sup>13</sup> Documentation of AI models, data sources, and the general logic employed should be maintained to facilitate these explanations.
- **Open Communication:** The policy should commit the organization to ongoing and proactive communication about its AI practices.<sup>2</sup> This could involve publishing annual summaries of AI use, informing donors how their data might be analyzed by AI tools (with appropriate consent), or holding community consultations when introducing new AI systems to explain their purpose and address concerns.<sup>2</sup> Building trust involves demystifying AI and demonstrating respect for stakeholders' right to know.

### **3.4. Establishing Robust Accountability and Governance**

Without clear lines of accountability, the use of AI can lead to a "responsibility gap," where it is unclear who is answerable if an AI system makes a mistake or causes harm.<sup>2</sup> For non-profits, where public trust and mission fulfillment are paramount, it must be unequivocal that the organization and specific individuals within it remain accountable for all AI-driven outcomes.

### **Policy Strategies:**

- **Defined Roles and Oversight:** The policy must assign responsibility for AI oversight to specific roles or bodies within the organization.<sup>2</sup> This could be a designated AI Ethics Officer, an existing senior staff member (such as the Privacy Officer or IT Lead), or an internal AI committee. Some organizations may even assign this oversight to a board committee.<sup>2</sup> This designated body should be responsible for monitoring compliance with the AI policy, reviewing proposals for

new AI tools, and keeping leadership informed of emerging AI-related risks and best practices.

- **Human-in-the-Loop & Decision Boundaries:** As mentioned under Fairness, the policy must explicitly specify where human intervention and approval are required within AI-augmented workflows.<sup>2</sup> For example, it might state that while AI can provide preliminary analysis or recommendations, final decisions impacting clients, finances, or public communications always require human approval. The OTUS Group's analogy of AI as an intern that gets you 70% of the way there, with the final 30% needing human review, is apt.<sup>2</sup>
- **Incident Response Plan:** Despite preventative measures, issues may arise from AI use (e.g., an AI providing incorrect advice, a data breach involving an AI tool). The policy should include a detailed AI incident and breach response protocol.<sup>2</sup> This protocol should outline clear steps: immediate notification of leadership, communication with affected parties as required by law, disabling or correcting the problematic AI system, thorough investigation of the root cause, and documentation of lessons learned to prevent recurrence.
- **Stakeholder Feedback and Recourse:** The policy should establish accessible channels for clients, staff, volunteers, and community members to ask questions, express concerns, or provide feedback about the organization's AI use.<sup>2</sup> It should also outline a clear process for addressing complaints, such as an appeal to a human staff member if a client feels an AI-driven process was unfair.

### ***Template for a Simple AI Governance Structure***

- **AI Oversight Lead/Committee:** (e.g., Executive Director, designated Board Member, or cross-departmental committee)
  - Responsibilities: Champion the AI policy, oversee its implementation and review, report to the Board/Leadership on AI initiatives and risks, ensure alignment with strategic goals.
- **Data Steward(s)/Privacy Officer:** (e.g., existing Privacy Officer, IT Manager, or senior program staff)
  - Responsibilities: Ensure AI data practices comply with privacy laws and the AI policy, oversee data quality and security for AI systems, manage consents, advise on data minimization.
- **Departmental AI Leads (if applicable for larger NPOs):** (e.g., Fundraising Lead, Program Lead)
  - Responsibilities: Identify potential AI use cases within their department, ensure staff are trained on relevant AI tools and policy aspects, monitor departmental AI use for compliance and effectiveness.
- **Reporting Mechanism:**

- Regular updates on AI activities and compliance to the AI Oversight Lead/Committee.
- Annual report to the Board on AI strategy, risks, and policy adherence.
- **Review Cycle:**
  - Annual review of the AI Use Policy and governance structure.
  - Post-implementation reviews for significant new AI deployments.

### 3.5. Prioritizing Data Privacy and Security

AI systems often rely on vast amounts of data, which frequently includes personal and highly sensitive information about beneficiaries, donors, and staff.<sup>2</sup> Mishandling this data through improper collection, use, sharing, or storage can lead to severe privacy violations, erode public trust, and incur legal penalties.<sup>7</sup> Furthermore, AI tools, especially third-party or cloud-based solutions, can introduce new cybersecurity vulnerabilities.

#### Policy Strategies:

- **Compliance with Privacy Law:** The AI policy must emphatically reinforce that all AI use involving personal information will strictly adhere to applicable Canadian federal (PIPEDA) and provincial privacy legislation (e.g., PIPA in Alberta and BC, Quebec's Law 25).<sup>2</sup> This includes obtaining valid, informed consent for data collection and clearly specifying the purposes for which data will be used by AI systems. The joint principles for generative AI released by Canadian privacy commissioners provide further relevant guidance.<sup>2</sup> Non-profits should review and update their existing privacy policies to encompass AI-driven data processing.
- **Data Minimization and Retention:** An ethical AI policy will mandate limiting data collection and retention to only what is strictly necessary for the AI's defined and appropriate functions.<sup>2</sup> AI systems should only be fed the minimum data required. Any personal data generated by AI (e.g., analytical profiles, classifications) must be stored securely and disposed of rigorously when no longer needed for its specified purpose. Data retention schedules must be updated to account for new types of data created by AI.
- **Robust Security Measures:** The policy must comprehensively address cybersecurity for AI systems. This includes mandating technical measures such as strong encryption for data at rest and in transit, strict access controls to ensure only authorized personnel can use AI tools or view AI-managed data, and regular security audits of AI systems and associated infrastructure.<sup>2</sup> Multi-factor authentication should be required for accessing AI systems, especially those handling sensitive client data.

- **Vendor and Tool Due Diligence:** Many non-profits will utilize pre-built AI tools or platforms. The policy must mandate a thorough privacy and security review of any third-party AI vendor or tool before adoption.<sup>2</sup> This review should assess compliance with Canadian privacy principles (e.g., data usage for secondary purposes, data sharing with other parties, security incident history). If a tool's practices are unclear or concerning, the non-profit should avoid it or implement strong compensating controls (like data anonymization before input). Data Processing Agreements (DPAs) or similar contractual safeguards should be in place with AI service providers, ensuring they commit to protecting data according to Canadian standards.

### ***Vendor Assessment Checklist for Privacy & Security***

- **Data Governance & Compliance:**
  - Does the vendor comply with PIPEDA and relevant Canadian provincial privacy laws?
  - Where will data be stored and processed (preference for Canadian hosting)?
  - What is their policy on data ownership? Who owns the data input into the AI and the outputs?
  - Do they have a clear privacy policy detailing data collection, use, sharing, and retention practices for the AI service?
  - Will they sign a Data Processing Agreement (DPA) that meets Canadian standards?
- **Data Security Measures:**
  - What encryption methods are used for data at rest and in transit?
  - What access control mechanisms are in place (e.g., role-based access, MFA)?
  - Do they conduct regular security audits and penetration testing? Can they share results/certifications?
  - What is their incident response plan for data breaches? How will they notify you?
- **AI Model Specifics (if applicable):**
  - What data was used to train the AI model? Were there any biases identified and mitigated?
  - Does the vendor use client data to further train their general AI models? If so, is this opt-out?
  - How does the vendor ensure the accuracy and reliability of the AI outputs?
- **Transparency & Explainability:**
  - Can the vendor explain, in understandable terms, how the AI system makes decisions or generates outputs?
  - What information is provided about the limitations or potential failure modes

of the AI?

- **Ethical Considerations:**
  - Does the vendor have an AI ethics framework or policy?
  - How do they address potential biases or discriminatory outcomes from their AI?
- **Track Record & Support:**
  - Has the vendor experienced any significant security incidents or data breaches?
  - What level of technical support and training is provided?

### **3.6. Maintaining Operational Integrity and Effectiveness**

While AI offers significant potential to improve non-profit operations, its improper use or over-reliance can lead to errors, disrupt services, misinform decision-making, or compromise service quality.<sup>2</sup> Staff may also feel confused or ill-equipped to integrate AI into their workflows without clear guidance.

#### **Policy Strategies:**

- **Human Oversight in Key Operations:** The policy must reiterate the need for human review and approval in critical operational areas such as finance, fundraising, and case management.<sup>2</sup> Experts warn that AI tools are not yet infallible for tasks like non-profit financial management; AI-generated financial reports, budgets, or forecasts must be double-checked by qualified personnel before decisions are made.<sup>2</sup> Similarly, AI-drafted donor communications or grant proposals should be meticulously reviewed by staff for accuracy, tone, and mission alignment.<sup>2</sup>
- **Staff Training and AI Literacy:** An AI policy's effectiveness hinges on the people implementing it. Non-profits must commit to ongoing, comprehensive training for employees and volunteers on the ethical and effective use of AI tools, as well as the specifics of the organization's AI policy.<sup>1</sup> Training should cover basic AI literacy (capabilities and limitations), ethical considerations (bias, privacy), hands-on instruction for deployed tools, and procedures for identifying and reporting AI errors or concerns. Given that a lack of skilled staff is a recognized barrier to digital transformation in the sector<sup>2</sup>, investing in upskilling is crucial.
- **Continuous Evaluation and Audits:** The policy should establish a mechanism for the regular evaluation of AI systems and the overall AI strategy.<sup>2</sup> This might involve annual AI audits to assess whether tools are still serving the mission effectively, remain secure, and whether new risks or unintended consequences have emerged. Post-implementation reviews for major AI projects are also advisable.

As legal experts advise, AI policies must be flexible and updated to keep pace with evolving best practices and regulations.<sup>2</sup>

- **Alignment with Mission Outcomes:** A fundamental aspect of operational integrity is ensuring that AI use directly advances the non-profit's core mission and provides tangible community benefit.<sup>2</sup> All AI deployments should be evaluated not just for efficiency gains but for their alignment with the organization's purpose. If an AI tool introduces new barriers for clients or detracts from human-centric goals, its use should be reconsidered.

### **3.7. Integrating Culturally Specific and Indigenous Perspectives**

Canada's diverse social fabric, and the frequent work of non-profits with Indigenous Peoples, racialized groups, and culturally distinct communities, makes the integration of culturally specific and Indigenous perspectives into an AI Use Policy an ethical imperative.<sup>2</sup> Failure to do so risks perpetuating historical injustices, creating new forms of digital exclusion, and causing significant harm.<sup>15</sup> This component of the policy is not an add-on but a fundamental aspect of responsible AI in the Canadian context.

#### **Policy Strategies:**

- **Respecting Indigenous Data Sovereignty:** The policy must explicitly recognize and commit to upholding Indigenous data sovereignty principles. For First Nations data, this means adhering to OCAP® (Ownership, Control, Access, Possession).<sup>2</sup> For broader Indigenous data contexts, the CARE Principles (Collective Benefit, Authority to Control, Responsibility, Ethics) offer valuable guidance.<sup>25</sup> This involves obtaining free, prior, and informed consent from Indigenous communities before their data is used in AI systems, ensuring data governance aligns with community protocols, and working to ensure that any benefits derived from the AI analysis of Indigenous data are shared with and directly benefit those communities. The current integration of OCAP® into national AI policy frameworks is limited, making it even more critical for non-profits to champion these principles.<sup>23</sup> This means moving beyond consultation to genuine co-design and benefit-sharing.
- **Integrating Indigenous Worldviews in AI Use:** Indigenous knowledge systems often emphasize holistic thinking, the interdependence of all living things, and responsible stewardship.<sup>2</sup> The AI policy can reflect these values by stating a commitment to using AI in ways that are sustainable, environmentally conscious (e.g., considering the energy consumption of AI models<sup>2</sup>), and in harmony with collective community well-being. CIFAR's "Indigenous Perspectives in AI" course is an example of efforts to broaden this understanding.<sup>2</sup>

- **Community Engagement and Co-Design:** For all cultural, ethnic, or marginalized groups served, the policy should promote deep engagement and genuine co-design throughout the AI lifecycle.<sup>2</sup> This echoes guidance from the OHRC, which stresses involving a diversity of communities.<sup>2</sup> For instance, a settlement agency using AI translation tools should collaborate with newcomer communities to evaluate accuracy and cultural sensitivity. The policy might formalize this by stating that AI impacting a specific demographic will be developed or tested in partnership with representatives of that group.
- **Avoiding Cultural Bias and Harm:** AI systems predominantly trained on Western data may perform poorly or cause harm when applied to other cultures.<sup>2</sup> The policy must recognize this risk and require that AI tools be evaluated for cultural bias. If an AI tool exhibits performance gaps or perpetuates biases for certain groups, the non-profit should seek alternatives or advocate for improvements. Crucially, the policy should pledge that AI will not be used in ways that reinforce historical injustices, particularly for Indigenous Peoples (e.g., avoiding AI in surveillance or child welfare contexts without explicit community oversight and consent, given legacies of discrimination).<sup>2</sup> Instead, the focus should be on using AI to actively address inequities, with community input.

***Guiding Questions for Indigenous Community Engagement (Based on OCAP®/CARE and Co-Design Principles)***

- **Ownership:** Who owns the data being collected or used? How is community ownership recognized and upheld in the context of this AI project?
- **Control:** How will the Indigenous community control how their data is collected, used, stored, and shared within this AI initiative? What are the community's protocols for data governance, and how will they be respected?
- **Access:** Who will have access to the Indigenous data used by the AI system and the insights generated? How will the community access their data and the results of the AI analysis?
- **Possession:** Where will the Indigenous data be stored? How will the community maintain possession or stewardship of their data, even when used by external AI systems?
- **Collective Benefit:** How will this AI project directly and tangibly benefit the Indigenous community? Have these benefits been defined and agreed upon by the community?
- **Authority to Control (CARE):** Does the community have the authority to make decisions about the AI project at all stages, including design, development, deployment, and evaluation?
- **Responsibility:** How will the non-profit ensure transparency and accountability

to the Indigenous community regarding the AI project's data use, processes, and outcomes? How will potential harms be addressed?

- **Ethics:** Have the community's ethical guidelines and cultural values been integrated into the design and proposed use of the AI system? How will the project ensure it minimizes harm and promotes justice from an Indigenous perspective?
- **Free, Prior, and Informed Consent (FPIC):** Has FPIC been obtained from the appropriate community governing bodies and members for the use of their data and for their participation in the AI project? Is this an ongoing process?
- **Co-Design & Partnership:** Is the Indigenous community involved as an equal partner in the co-design, development, and governance of the AI system, rather than merely as a subject of consultation?
- **Capacity Building & Reciprocity:** Does the project include elements of capacity building within the Indigenous community related to AI and data literacy? Is there a plan for sharing knowledge and resources back with the community?

By systematically addressing these interconnected components, non-profits can construct an AI Use Policy that is robust, ethically sound, and tailored to their unique operational realities and the Canadian context.

## **Section 4: Putting Your Policy into Action: Practical Implementation**

Developing a comprehensive AI Use Policy is a critical first step, but its true value is realized through effective implementation. This section provides practical guidance for Canadian non-profits on how to translate their AI policy into actionable practices, acknowledging that successful adoption is as much about people and processes as it is about technology.

### **Getting Started: AI Readiness for Your Non-Profit**

Before diving into complex AI deployments, it is essential for a non-profit to assess its readiness. This involves an honest internal evaluation of current technological capabilities, data maturity, staff skills, and the prevailing organizational culture concerning AI adoption.<sup>27</sup> An AI readiness assessment can help identify strengths to build upon and gaps that need addressing. Key questions to consider include<sup>27</sup>:

- How are AI-powered tools or platforms currently being used, if at all?
- What is the general level of understanding and interest in AI among staff?
- What are the perceived barriers to adopting AI (e.g., cost, skills, ethical concerns)?

- How well are existing company AI policies (if any) understood?
- Are there specific tasks or challenges where AI could provide significant help?

Based on this assessment, non-profits should identify a few specific, high-impact use cases where AI could offer tangible benefits to start their journey.<sup>1</sup> The advice to "start small and scale gradually" is particularly relevant for resource-constrained organizations.<sup>1</sup> Piloting AI in a specific function allows the organization to measure performance, learn best practices, and build confidence before attempting larger-scale implementations.<sup>1</sup> This iterative approach is not just practical; it's also a crucial risk mitigation strategy. By starting with lower-stakes AI applications, non-profits can learn and adapt their policies based on real-world experience, reducing the likelihood of significant missteps with more critical systems. The Toronto Furniture Bank, for example, encourages staff to "learn as they go" under clear principles, acknowledging that a rigid blueprint for all AI scenarios doesn't yet exist.<sup>2</sup>

## **Developing Your Policy: A Collaborative Approach**

The development of the AI Use Policy itself should be a collaborative endeavor rather than a top-down directive. This fosters greater buy-in and ensures the policy is practical and relevant to the organization's diverse functions.

- **Form a Working Group:** Assemble a working group with representation from various levels and departments, including senior leadership, program staff, IT personnel, communications, fundraising, and potentially board members or even client/community representatives where appropriate.<sup>2</sup> This diversity of perspectives is invaluable.
- **Consult Widely:** Engage in meaningful consultation with key stakeholders—staff, volunteers, clients, donors, and community partners—to gather their insights, concerns, and expectations regarding AI use.<sup>2</sup> Their input will strengthen the policy and its acceptance.<sup>30</sup>
- **Draft and Tailor:** Using the framework outlined in Section 3, the working group can draft the policy, ensuring it is tailored to the non-profit's specific size, mission, activities, and the types of AI it anticipates using.
- **Review and Approve:** The draft policy should be reviewed by legal counsel (if available and appropriate) and ultimately approved by the organization's leadership or board.

This collaborative process helps ensure the policy is a living document that reflects the organization's collective understanding and commitment.

## Staff Training and AI Literacy

An AI policy is only as effective as the people who must understand and apply it. Therefore, comprehensive and ongoing training for staff and volunteers is critical.<sup>1</sup>

- **Training Content:** Training should cover:
  - Basic AI literacy: What AI is, what it can and cannot do, its strengths and limitations.
  - Ethical considerations: Understanding potential biases, privacy risks, and the importance of fairness and transparency.
  - The organization's AI Use Policy: Key provisions, responsibilities, and procedures.
  - Specific AI tools: Hands-on instruction for any AI tools the non-profit deploys.
  - Reporting procedures: How to identify and report AI errors, biases, security concerns, or other policy breaches.
- **Addressing Skill Gaps:** Given that many non-profits cite a lack of skilled staff as a barrier to digital transformation<sup>2</sup>, investing in upskilling is essential.<sup>1</sup> Furniture Bank's experience highlights that for organization-wide adoption to succeed, staff must see personal value in AI.<sup>32</sup> Training should emphasize how AI can augment their roles and help them achieve their objectives more effectively, rather than posing a threat. This approach is central to effective change management in AI implementation.

## Ongoing Monitoring, Evaluation, and Policy Updates

The field of AI is evolving rapidly, as are regulatory landscapes and societal expectations. Consequently, an AI Use Policy cannot be a static document; it must be a "living document" that is regularly reviewed and updated.<sup>2</sup>

- **Regular Reviews:** Schedule periodic reviews of the AI policy (e.g., annually or biennially) to ensure it remains relevant and effective.
- **AI Audits:** Conduct regular evaluations or audits of AI systems in use.<sup>20</sup> These audits should assess:
  - Effectiveness: Is the AI tool still serving its intended purpose and advancing the mission?
  - Accuracy and Bias: Are the outputs accurate? Have any new biases emerged?
  - Security: Is the tool secure and are data protection measures adequate?
  - Compliance: Is the use of the tool still compliant with the AI policy and relevant laws/regulations?
- **Reporting:** The designated AI oversight body should report regularly (e.g., annually) to the board or senior leadership on AI use, policy compliance,

identified risks, and any recommendations for policy updates or changes to AI strategy.<sup>2</sup>

- **Adapting to Change:** The policy should be updated in response to significant technological advancements, new legal or regulatory requirements, lessons learned from AI incidents (if any), and evolving best practices in ethical AI.

A significant, though often unstated, barrier to AI adoption and policy implementation for many non-profits is simply a lack of awareness of the existing resources, guidelines, and support systems available to them. The research for this toolkit has uncovered numerous Canadian initiatives (detailed in Section 6) designed to assist non-profits in this journey. By providing a structured approach to implementation, including readiness assessment and continuous evaluation, this toolkit aims to empower non-profits to not only create a policy but to embed responsible AI practices into their ongoing operations.

## Section 5: Navigating the Canadian AI Landscape

For Canadian non-profits venturing into the use of artificial intelligence, understanding the specific national legal, ethical, and human rights frameworks is paramount. This landscape is characterized by a mix of existing general laws, emerging AI-specific guidelines, and influential (though sometimes non-binding) tools. While comprehensive federal AI legislation like the Artificial Intelligence and Data Act (AIDA) has been terminated<sup>8</sup>, the principles it sought to codify—around risk management, fairness, and accountability—remain highly relevant and are reflected in ongoing regulatory efforts and existing legal structures. This evolving environment underscores the importance for non-profits to adopt robust internal AI policies as a form of proactive self-regulation and ethical leadership.

### Understanding Key Legislation and Guidelines

A number of legal and quasi-legal instruments shape the responsible use of AI in Canada:

- **Personal Information Protection and Electronic Documents Act (PIPEDA):** This federal privacy law governs how private sector organizations (including many non-profits) collect, use, and disclose personal information in the course of commercial activities. While PIPEDA makes no explicit mention of AI, its core fair information principles—such as consent, purpose limitation, accuracy, accountability, and safeguarding—apply directly to AI systems that process personal data.<sup>2</sup> Non-profits using AI for donor analytics, client management, or any function involving personal information must ensure compliance with PIPEDA.

- **Provincial Privacy Laws:** Several provinces have their own private sector privacy legislation that is deemed substantially similar to PIPEDA, such as Alberta's and British Columbia's Personal Information Protection Act (PIPA), and Quebec's Act respecting the protection of personal information in the private sector (Law 25).<sup>2</sup> Quebec's Law 25, for example, includes specific provisions related to automated decision-making. Non-profits must be aware of and comply with the specific provincial legislation applicable in their jurisdiction(s) of operation.
- **Office of the Privacy Commissioner of Canada (OPC) Guidance:** The OPC has been proactive in issuing guidance on AI. Notably, in collaboration with provincial and territorial counterparts, the OPC released "Principles for responsible, trustworthy and privacy-protective generative AI technologies" in 2023.<sup>2</sup> These principles cover areas such as legal authority and consent, appropriate purposes, necessity and proportionality, openness, accountability, individual access, limiting collection/use/disclosure, accuracy, and safeguards. The OPC has also issued statements on data scraping and its role in fostering trustworthy AI, often in collaboration with international bodies.<sup>13</sup> This guidance, while not law, signals regulatory expectations and best practices.
- **The (Stalled) Artificial Intelligence and Data Act (AIDA):** Introduced as part of Bill C-27, AIDA aimed to establish a risk-based regulatory framework for AI systems, with a particular focus on "high-impact systems" and prohibiting uses that could cause serious harm or result in biased output.<sup>2</sup> Although Bill C-27 (and thus AIDA) was terminated in early 2025 due to parliamentary prorogation<sup>8</sup>, the policy objectives and principles underlying AIDA (such as human oversight, transparency, fairness, safety, and accountability) reflect ongoing governmental and societal concerns about AI. It is widely anticipated that future AI-specific legislation will emerge in Canada.<sup>8</sup> The termination of AIDA makes it even more critical for non-profits to establish strong internal AI use policies based on these widely accepted principles.
- **Other Relevant Frameworks:** Depending on their specific activities, non-profits might also need to consider sector-specific regulations (e.g., in healthcare) or other general laws like consumer protection or copyright law, which may apply to AI systems.<sup>36</sup>

## Human Rights Considerations

Beyond privacy, the use of AI by non-profits must align with Canadian human rights laws, which prohibit discrimination based on grounds such as race, gender, disability, age, and religion.

- **Ontario Human Rights Commission (OHRC) Human Rights AI Impact**

**Assessment (HRIA):** In late 2024, the OHRC, in partnership with the Law Commission of Ontario, launched Canada's first AI impact assessment tool specifically focused on human rights compliance.<sup>2</sup> The HRIA is a practical guide designed to help organizations identify, assess, prevent, and mitigate potential biases, discrimination, and other adverse human rights impacts of AI systems.<sup>2</sup> It encourages organizations to consider human rights at every stage of the AI lifecycle, from design and development to deployment and monitoring.<sup>16</sup> The HRIA is structured to assess the purpose of the AI system, its potential for high-risk human rights violations (e.g., if it influences decisions, uses biometric tools, or impacts historically disadvantaged groups), issues of differential treatment, and the need for accommodation.<sup>16</sup> While specific to Ontario, the principles and methodology of the HRIA offer a valuable framework for human rights due diligence that non-profits across Canada can adapt and adopt, especially given the concerns about "biased output" and "harm" that were central to the proposed AIDA.

- **General Human Rights Principles:** Non-profits must ensure their AI systems do not create or perpetuate systemic discrimination. This requires careful attention to the data used to train AI models, the algorithms themselves, and the impact of AI-driven decisions on diverse communities.

## **The Importance of Indigenous Data Sovereignty in Canada**

A critical and unique aspect of the Canadian ethical landscape for AI is the imperative to respect Indigenous data sovereignty. This principle recognizes the inherent right of Indigenous Peoples to govern the collection, ownership, and application of data about their communities, lands, and cultures.

- **OCAP® (Ownership, Control, Access, and Possession):** Developed by the First Nations Information Governance Centre (FNIGC), OCAP® provides a set of standards for how First Nations data should be collected, protected, used, and shared.<sup>2</sup> These principles assert that First Nations have control over data collection processes in their communities, own the information collected from their members, control access to that information, and have the right to possess and manage their data. Non-profits working with First Nations communities or their data must understand and adhere to OCAP® principles.
- **CARE Principles for Indigenous Data Governance (Collective Benefit, Authority to Control, Responsibility, Ethics):** These principles, complementary to OCAP®, emphasize that the use of Indigenous data must be for the collective benefit of Indigenous Peoples, that Indigenous Peoples have the inherent right to control their data, that those working with Indigenous data have a responsibility

to share how it is used to support self-determination, and that Indigenous ethics must guide data use to minimize harm and promote justice.<sup>25</sup>

- **Risks and Responsibilities:** The use of AI with Indigenous data carries risks of digital colonialism, misrepresentation, and the appropriation of Indigenous knowledge if not approached with utmost respect and in genuine partnership with Indigenous communities.<sup>22</sup> True respect for Indigenous data sovereignty requires non-profits to move beyond mere consultation to active co-design, ensuring that Indigenous communities are equal partners in shaping AI tools that affect their futures and that tangible benefits flow back to these communities.<sup>2</sup> This includes supporting Indigenous-led AI research and infrastructure.

The following table provides a consolidated overview of some key Canadian frameworks relevant to AI use by non-profits:

### Overview of Key Canadian AI-Related Legal & Ethical Frameworks for Non-Profits

Framework Name	Status	Key Relevance to Non-Profit AI Use	Primary Source/Link (Illustrative)
<b>PIPEDA (Personal Information Protection and Electronic Documents Act)</b>	Federal Law	Governs collection, use, disclosure of personal information by AI systems in commercial activities. Principles of consent, purpose, accountability apply.	<a href="#">Office of the Privacy Commissioner of Canada</a>
<b>Provincial Privacy Laws (e.g., AB/BC PIPA, QC Law 25)</b>	Provincial Law	Similar to PIPEDA, may have specific nuances (e.g., Quebec's automated decision-making provisions).	Relevant Provincial Privacy Commissioner websites
<b>OPC Principles for Responsible Generative AI</b>	Federal Guidance (OPC)	Provides 9 principles for privacy-protective development and use of generative AI (legal authority, purpose,	<a href="#">OPC Website</a> <sup>13</sup>

		necessity, openness, accountability, access, limits, accuracy, safeguards).	
<b>OHRC Human Rights AI Impact Assessment (HRIA)</b>	Provincial Guidance (Ontario)	Tool to identify, assess, mitigate human rights risks (bias, discrimination) in AI systems. Principles adaptable across Canada.	( <a href="https://www3.ohrc.on.ca/en/human-rights-ai-impact-assessment">https://www3.ohrc.on.ca/en/human-rights-ai-impact-assessment</a> ) <sup>2</sup>
<b>OCAP® (Ownership, Control, Access, Possession)</b>	Indigenous Governance Principles (First Nations)	Standard for how First Nations data should be collected, protected, used, and shared. Essential for work involving First Nations data.	<a href="#">First Nations Information Governance Centre (FNIGC)</a> <sup>24</sup>
<b>CARE Principles for Indigenous Data Governance</b>	Indigenous Data Governance Principles	Principles of Collective benefit, Authority to control, Responsibility, and Ethics for Indigenous data.	( <a href="https://www.gida-global.org/care">https://www.gida-global.org/care</a> ) <sup>25</sup>
<b>(Former) Artificial Intelligence and Data Act (AIDA) Principles</b>	(Stalled Federal Bill)	Though terminated, its risk-based approach and principles (human oversight, transparency, fairness, safety, accountability) indicate ongoing policy direction.	Archived legislative summaries (e.g. <sup>34</sup> )
<b>Government of Canada - Guide on the use of generative AI</b>	Federal Guidance	Practical tips for public servants (relevant for all organizations) on data confidentiality,	( <a href="https://www.canada.ca/en/government/system/digital-government/digital-government-innovations/responsi">https://www.canada.ca/en/government/system/digital-government/digital-government-innovations/responsi</a>

		verifying AI outputs, etc.	<a href="https://ble-use-ai/guide-use-generative-ai.html">ble-use-ai/guide-use-generative-ai.html</a> <sup>2</sup>
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Navigating this complex and evolving landscape requires diligence. By understanding these frameworks and integrating their principles into their AI Use Policy, Canadian non-profits can build a strong foundation for responsible AI adoption, maintain public trust, and ensure their technological advancements align with their core values and legal obligations.

## Section 6: Resources for Your Non-Profit's AI Journey

Embarking on the AI journey can seem daunting, especially for non-profits with limited resources or in-house technical expertise. Fortunately, a growing ecosystem of support initiatives, practical tools, and learning resources is emerging in Canada to assist non-profits in navigating AI adoption responsibly and effectively. This section provides a curated list of these resources, aiming to bridge the awareness gap and empower organizations to take their next steps with confidence.

### Canadian Support Initiatives and Networks

Several Canadian organizations and programs are dedicated to helping non-profits build capacity and implement AI ethically:

- **RAISE Program (Responsible AI Adoption for Social Impact):** This national initiative, co-funded by DIGITAL (Canada's Global Innovation Cluster for digital technologies), aims to help Canadian non-profits adopt AI responsibly.<sup>2</sup> RAISE focuses on building AI capacity, developing governance frameworks centered on ethics, diversity, equity, and inclusion (DEI), and includes an AI Adoption Accelerator for selected non-profits, as well as AI upskilling for non-profit professionals.<sup>6</sup>
- **TechSoup Canada:** As part of the TechSoup Global Network, TechSoup Canada provides non-profits, charities, and libraries with access to donated and discounted technology products and a wealth of learning resources.<sup>39</sup> They offer specific AI services for non-profits, including consultations, solutions for marketing automation, fundraising enablement, custom chatbots, and AI integration services, often in partnership with networks like Tapp Network.<sup>40</sup> They also publish an AI Benchmark Report providing insights into AI adoption in the sector<sup>29</sup> and host webinars on AI topics.<sup>42</sup>
- **Canadian Centre for Nonprofit Digital Resilience (CCNDR):** This organization, often working with Imagine Canada, focuses on strengthening the digital capacity of the non-profit sector. CCNDR offers resources such as "Digital Leadership

Training" for non-profit executives and board members and is a partner in the RAISE initiative.<sup>4</sup>

- **Ontario Nonprofit Network (ONN):** ONN actively engages in policy discussions related to data and privacy for non-profits. They offer resources like the Data Evidence-Use Learning (DEAL) project and a Framework for Nonprofit Data Strategies, advocating for ethical data use and privacy legislation that considers the non-profit context.<sup>43</sup>
- **Government of Canada Guides:** Various government departments provide guidance relevant to AI. Innovation, Science and Economic Development Canada (ISED) has published an "Implementation guide for managers of Artificial intelligence systems" based on the Voluntary Code of Conduct for Advanced Generative AI Systems.<sup>36</sup> The Treasury Board of Canada Secretariat offers a "Guide on the use of generative AI" with practical tips initially for public servants but broadly applicable.<sup>2</sup> Accessible Canada provides a technical guide on "Accessible and equitable artificial intelligence systems".<sup>44</sup>
- **DIGITAL (Canada's Global Innovation Cluster for digital technologies):** Beyond co-investing in RAISE, DIGITAL supports a range of AI skilling programs aimed at increasing the AI capabilities of the Canadian workforce across various sectors, including programs specifically for non-profits and Indigenous talent.<sup>4</sup>

### **Practical AI Tools for Non-Profits (Including Free/Low-Cost Options)**

A variety of AI tools are available that can assist non-profits in different areas of their work. While the availability of free or low-cost options lowers the barrier to entry for experimentation<sup>12</sup>, it is crucial for non-profits to conduct thorough due diligence regarding the privacy, security, and data usage policies of any tool, especially free ones, as these may monetize data in ways that could be problematic.<sup>11</sup>

- **Content Creation & Marketing:**
  - **AI Writing Assistants:** Tools like Grammarly (freemium), Jasper, and Owlywriter AI by Hootsuite can help with drafting and refining marketing copy, social media posts, newsletters, and reports.<sup>12</sup> CanadaHelps also highlights the utility of AI for generating first drafts or editing content.<sup>11</sup>
  - **AI Image Generation:** Platforms can create unique images for campaigns or illustrative purposes, which can be useful for ethically visualizing sensitive issues without using real individuals' photos.<sup>11</sup>
- **Productivity & Operations:**
  - **Project Management & Collaboration:** AI features are being integrated into platforms like ClickUp, Slack, Smartsheet, and Asana to help automate tasks, summarize information, and improve workflows.<sup>12</sup>

- **Transcription Services:** Tools like Otter.ai can save significant time by transcribing meetings and interviews.<sup>29</sup>
- **Fundraising & Donor Engagement:**
  - **Grant Writing Assistance:** AI tools like FreeWill's Grant Assistant are designed to help non-profits with grant research and proposal writing.<sup>12</sup> AI can also assist in identifying relevant grant opportunities and refining narratives.<sup>11</sup>
  - **Donor Management & Personalization:** Salesforce for Nonprofits offers Agentforce AI, which can help summarize donor engagement and draft personalized gift proposals.<sup>45</sup> AI can also be used for audience segmentation and personalizing donor journeys.<sup>11</sup>
- **Chatbots:** AI-powered chatbots can provide real-time responses to inquiries on a non-profit's website, improving stakeholder engagement and support.<sup>11</sup>

## Further Reading and Learning

Continuous learning is key in the rapidly evolving field of AI.

- **Reports and Research:** The TechSoup AI Benchmark Report offers valuable insights into AI adoption trends and challenges in the non-profit sector.<sup>29</sup> Publications from organizations like CIFAR (Canadian Institute for Advanced Research) and the First Nations Technology Council<sup>22</sup> can provide deeper perspectives on AI ethics and specific community impacts.
- **Webinars and Courses:** TechSoup Canada regularly hosts webinars on AI and other technology topics.<sup>40</sup> Programs like the AI4Good Lab offer machine learning training with a focus on social good projects, particularly for women and gender-diverse individuals.<sup>47</sup> Many universities and online platforms also offer introductory and advanced AI courses.

The following table provides a selection of these resources, categorized for easier navigation:

## Selected AI Tools & Resources for Canadian Non-Profits

Tool/Resource Name	Category	Brief Description &	Cost Indication	Key Consideration/

		Potential Use Case for Non-Profits		Link
<b>RAISE Program</b>	Support Initiative	National program for responsible AI adoption, capacity building, governance frameworks.	Program-specific (some cohorts funded)	<sup>6</sup> (Check for current cohorts)
<b>TechSoup Canada</b>	Support Initiative / Tools / Learning	Donated/discounted tech, AI services (marketing, fundraising, chatbots), webinars, AI Benchmark Report.	Varies (discounts, free resources, paid services)	( <a href="https://www.techsoup.ca/">https://www.techsoup.ca/</a> ) <sup>39</sup>
<b>CCNDR Digital Leadership Training</b>	Learning Platform	Training for non-profit executives and board members on digital leadership.	Program-specific	( <a href="https://imaginecanada.ca/">https://imaginecanada.ca/</a> ) <sup>31</sup>
<b>ONN Data &amp; Privacy Resources</b>	Support Initiative / Learning	Policy work, DEAL project, Framework for Nonprofit Data Strategies.	Free resources	<a href="#">ONN Website</a> <sup>43</sup>
<b>Grammarly</b>	Content Creation	AI-powered writing assistant for grammar, style, tone.	Freemium, Paid	<a href="#">Grammarly Website</a> <sup>12</sup>
<b>Salesforce for Nonprofits (Agentforce AI)</b>	Fundraising / Operations	CRM with AI for donor engagement,	Discounted for NPOs, Paid	( <a href="https://www.salesforce.com/nonprofit/">https://www.salesforce.com/nonprofit/</a> ) <sup>45</sup>

		personalized proposals, program summaries.		
<b>Otter.ai</b>	Productivity	AI transcription for meetings, interviews.	Freemium, Paid	<a href="#">Otter.ai Website</a> <small>29</small>
<b>ISED Guide for AI System Managers</b>	Learning / Guidance	Best practices for safety, accountability, transparency in AI systems.	Free	( <a href="https://ised-isd.e.canada.ca/site/ised/en/implementation-guide-managers-ai-artificial-intelligence-systems">https://ised-isd.e.canada.ca/site/ised/en/implementation-guide-managers-ai-artificial-intelligence-systems</a> ) <sup>36</sup>
<b>OHRC HRIA Tool</b>	Guidance / Compliance	Tool to assess human rights impacts of AI systems.	Free	( <a href="https://www3.ohrc.on.ca/en/human-rights-ai-impact-assessment">https://www3.ohrc.on.ca/en/human-rights-ai-impact-assessment</a> ) <sup>16</sup>
<b>AI4Good Lab</b>	Learning Platform	Machine learning training for women & gender diverse people, focusing on social good projects.	Program-specific (often free for participants)	<a href="#">AI4Good Lab Website</a> <sup>47</sup>

By leveraging these resources, Canadian non-profits can enhance their understanding of AI, develop robust policies, access appropriate tools, and ultimately harness the power of AI to further their missions in an ethical and impactful manner. The existence of this burgeoning support ecosystem indicates a collective recognition of both the potential of AI for social good and the necessity of guiding its adoption responsibly.

## Section 7: Inspiring Action: AI for Good in Canadian Non-Profits

The journey towards responsible AI adoption is not just a theoretical exercise; it is being actively navigated by innovative Canadian non-profits that are already leveraging AI to enhance their operations, deepen their impact, and advance their missions. These examples serve not only as inspiration but also as practical

demonstrations of how the principles and policies discussed in this toolkit can be brought to life. A common thread among these early adopters is a proactive approach to ethical considerations, often developing frameworks or manifestos alongside their technological implementations, and a willingness to collaborate and participate in broader initiatives to learn and share best practices.

### **Showcasing Canadian Non-Profit AI Innovators:**

- **Furniture Bank (Toronto):** This organization has emerged as a notable leader in the non-profit AI space.
  - **Ethical Communication:** Furniture Bank famously used AI-generated images for its "The Picture Isn't Real. The Reality Is..." campaign to ethically illustrate the issue of furniture poverty without compromising client dignity.<sup>2</sup> This demonstrates a thoughtful application of generative AI.
  - **Ethical Framework:** They developed a "Responsible AI Manifesto" in 2023, articulating their commitment to human-centered AI, ethical content generation, transparency, and accountability.<sup>2</sup> This proactive stance on ethics is a key takeaway.
  - **Operational & Strategic AI:** Beyond communications, Furniture Bank is using AI for deep research (transforming a task that took 11 years with volunteers into a 17-minute AI-driven process), strategic planning, operational excellence, marketing, and grant prospecting.<sup>19</sup> They have also implemented an AI-augmented contact centre.<sup>32</sup>
  - **Approach:** Their philosophy emphasizes ensuring staff see personal value in AI, starting with small, often "dollar-a-day" tools, and fostering a culture of learning and experimentation.<sup>32</sup> They are also part of the RAISE AI Adoption Accelerator.<sup>6</sup>
- **CAMH Foundation (Centre for Addiction and Mental Health):** As Canada's largest mental health teaching hospital, CAMH and its foundation are exploring AI's potential in a highly sensitive domain.
  - **RAISE Participant:** The CAMH Foundation is part of the inaugural cohort of the RAISE AI Adoption Accelerator, signaling a commitment to responsible AI adoption.<sup>4</sup>
  - **Clinical & Research Applications:** CAMH is leveraging technology and data to drive impact, exploring AI tools like the Oracle Health Clinical AI Agent to ease clinician workloads and improve care.<sup>50</sup> Their work is framed by a commitment to mental health as a social justice issue, implying a deep consideration of equity in technology use.<sup>50</sup>
- **Canadian Cancer Society (CCS):** A major national health charity, CCS is investing in and utilizing AI to accelerate progress in cancer research and care.

- **RAISE Participant:** CCS is also a participant in the RAISE program.<sup>4</sup>
- **AI in Research:** CCS funds and engages in research using AI for faster immunotherapy drug discovery, developing AI-based blood tests for earlier breast cancer detection, and employing machine learning to study proteins and identify new drug targets.<sup>52</sup> A notable outcome is an AI model co-developed with McGill University that can detect the spread of metastatic brain cancer via MRI scans with 85% accuracy.<sup>54</sup>
- **Collaboration & Education:** CCS partners with institutions like the CHUM School of AI in Healthcare to promote AI-oncology pioneers in Quebec and to educate health professionals and people living with cancer about AI's potential.<sup>53</sup> AI is being used at CHUM to optimize treatment schedules, predict appointment cancellations, and individualize radiotherapy treatments.<sup>53</sup> This collaborative approach is key to their AI strategy.
- **CanadaHelps:** As a critical infrastructure provider for online donations and fundraising in Canada, CanadaHelps is exploring AI to enhance the capabilities of the charitable sector.
  - **RAISE Participant:** CanadaHelps is another member of the RAISE AI Adoption Accelerator cohort.<sup>4</sup>
  - **Sector Enablement:** Through its blog and resources, CanadaHelps educates charities on practical AI applications, such as using predictive AI for audience segmentation and personalizing donor journeys, employing AI chatbots for stakeholder support, leveraging AI image generation to ethically tell stories, using AI as a writing assistant for various communications, and utilizing AI for grant research and proposal writing.<sup>11</sup>
- **Achēv (Employment & Newcomer Integration):** This organization provides essential services to newcomers in Canada and is applying AI to improve the integrity and efficiency of its programs.
  - **RAISE Participant:** Achēv is participating in the RAISE program.<sup>4</sup>
  - **Service Integrity:** Achēv has partnered with Adastra and AWS to implement an AI-powered fraud detection system (using Amazon Rekognition) for its language assessments for newcomers. This system enhances the integrity of the assessments, ensuring fairness and reliability, and allows Achēv to serve approximately 20,000 clients annually more efficiently.<sup>55</sup> This is a direct application of AI to core mission delivery.
  - **Broader Exploration:** Achēv is also exploring other AI applications in settlement services, including skill matching for employment, improving service accessibility, and language support.<sup>56</sup>

These examples illustrate that Canadian non-profits are moving beyond theoretical

discussions about AI and are actively implementing solutions that address core mission objectives, improve operational efficiency, and enhance stakeholder engagement. Their experiences underscore the importance of an ethics-first approach, the value of collaboration and participation in broader support networks like RAISE, and the potential for AI to be a transformative tool when guided by clear principles and a commitment to social good.

## A Call to Action for Canadian Non-Profits

The journey into artificial intelligence is one of continuous learning and adaptation. For Canadian non-profits, the imperative is clear: to engage with AI thoughtfully, strategically, and responsibly. This toolkit has aimed to provide a comprehensive roadmap—from understanding the critical need for AI policies and establishing core ethical principles, to building a robust policy framework and implementing it effectively within the unique Canadian landscape.

The examples of organizations like Furniture Bank, CAMH Foundation, Canadian Cancer Society, CanadaHelps, and Achēv demonstrate that AI, when wielded with care and aligned with mission, can indeed be a powerful ally. They show that even with resource constraints, impactful AI initiatives are possible, often starting small and building on successes.

Non-profits are encouraged to:

1. **Start the Conversation:** Initiate discussions within your organization about AI's potential and risks.
2. **Assess Your Readiness:** Understand your current capabilities and identify where AI could make the most difference.
3. **Develop Your Policy:** Use this toolkit as a guide to craft an AI Use Policy tailored to your organization's needs, values, and the communities you serve.
4. **Prioritize Ethics and Responsibility:** Embed principles of fairness, transparency, accountability, privacy, and human-centeredness into all AI endeavors.
5. **Engage and Collaborate:** Connect with the resources, networks, and peer organizations highlighted in this toolkit. Share learnings and seek support.
6. **Learn and Adapt:** Treat your AI policy and practices as living entities, subject to ongoing review and improvement as technology and understanding evolve.

By taking these informed steps, Canadian non-profits can navigate the complexities of the AI era with confidence, harnessing its transformative power to amplify their impact, better serve their communities, and contribute to a more equitable and just society. The future of AI in the non-profit sector is not predetermined; it will be

shaped by the choices and actions taken today.

## Conclusion

The integration of artificial intelligence into the operations and mission-delivery of Canadian social service non-profits presents a landscape of profound opportunity tempered by significant ethical and practical considerations. This AI Use Policy Toolkit has sought to provide a comprehensive guide for these organizations, emphasizing the critical need for proactive engagement with AI, the importance of adopting these technologies responsibly, and the foundational role of a well-crafted AI Use Policy in this journey.

The analysis underscores that while AI adoption in the Canadian non-profit sector is currently nascent<sup>2</sup>, the potential benefits—ranging from enhanced operational efficiency and data-driven decision-making to personalized client services and innovative fundraising strategies—are too significant to ignore.<sup>1</sup> However, these opportunities are intrinsically linked to risks concerning data privacy, algorithmic bias, stakeholder trust, and the potential for harm to vulnerable populations if AI is implemented without careful oversight.<sup>2</sup>

A central theme emerging is that an AI Use Policy is not merely a compliance document but a strategic enabler. It provides the necessary guardrails for non-profits to explore and implement AI in a manner that aligns with their core mission, ethical values, and the complex Canadian legal and human rights landscape.<sup>2</sup> Key components of such a policy must address fairness and non-discrimination, transparency, accountability and governance, data privacy and security, operational integrity, and, crucially in the Canadian context, culturally specific and Indigenous perspectives, including the principles of Indigenous data sovereignty such as OCAP® and CARE.<sup>2</sup>

The development and implementation of an AI policy should be a collaborative and iterative process, involving diverse stakeholders and grounded in ongoing learning and adaptation.<sup>2</sup> Starting with a clear understanding of organizational readiness, focusing on practical training and AI literacy for staff, and establishing mechanisms for continuous monitoring and evaluation are vital steps for successful and responsible AI integration.<sup>1</sup>

The Canadian context is unique, with evolving regulatory frameworks, strong privacy protections, a deep commitment to human rights, and the imperative of reconciliation with Indigenous Peoples. These factors must be thoughtfully woven into any non-profit's approach to AI. Resources such as the OPC's guidance on generative AI

<sup>13</sup>, the OHRC's Human Rights AI Impact Assessment tool <sup>16</sup>, and the growing ecosystem of support initiatives like the RAISE program <sup>6</sup> offer valuable assistance to non-profits on this path.

Ultimately, this toolkit serves as a call to action for Canadian non-profits to embrace AI not as a technological inevitability, but as a powerful tool that, when guided by strong ethical principles and robust policies, can significantly amplify their capacity to achieve social good. By acting now and responsibly, non-profits can ensure that AI serves to empower their missions, enhance the dignity and rights of the individuals and communities they serve, and contribute to a more just and equitable future for all Canadians.

Developing an AI policy is not a one-size-fits-all process — it's an ongoing commitment to reflection, responsibility, and alignment with your mission and values. This toolkit is a starting point to support that work.

If your organization would benefit from additional support—whether in policy development, staff training, or implementation planning—Mitchell Consulting Solutions is here to help.

**Book a no-pressure conversation at [mitchellconsultingsolutions.ca](https://mitchellconsultingsolutions.ca) to explore what's possible.**

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