# The Institute of Legacy Management's response to the Law Commission's consultation on Technical Issues in Charity Law

## 1. Introduction

In 2014, £2.3 billion was left in legacies to UK charities. This huge number is expected to rise markedly in the coming years due to an anticipated rise in death rates and because of increased awareness of legacy giving amongst charity trustees and charity supporters.

Given the importance of legacies to UK charities it is very important that the relevant legislation allows them to administer these legacies efficiently and effectively. While a degree of regulation is necessary, the last thing the public wants is for charities to waste the funds they are left complying with unnecessary legislation.

Opportunities to ensure that the legislation governing legacy giving are rare and the legacy sector is very aware of the opportunity that the Law Commission's Consultation on Technical Issues in Charity Law represents.

As the professional body for the legacy administration sector the Institute of Legacy Management has tried to ensure that our members embrace this opportunity by taking every available chance to publicise the consultation.

It was felt that the best way to ensure that the legacy administration sector's views were represented would be to conduct a survey of the ILM members which we would then use as the basis of our response to the Consultation.

The ILM's membership represents a huge range of charities across the UK charity sector and we gave everyone of these the opportunity to share their views on the Law Commission's proposals.

While we normally represent members rather than organisations we decided that on this occasion it would be preferable to restrict responses to one member from each charity. This approach has allowed us to obtain members views anonymously whilst still allowing us to demonstrate that we had heard from the majority of the major charities by legacy income.

We were delighted to receive 77 responses to our survey. Of these responses 69 were able to confirm that they were the sole respondent from their charity. While we have read all the responses we have ensured that only one response per charity has been used when calculating percentage response rates to questions.

We appear to have heard from each of the 14 biggest charities by legacy income. This is based on having 14 respondents who worked for charities with income in excess of £25 million in 2014 and the fact that Legacy Foresight reported that only 14 charities received in excess of £25 million in 2014.

In order of income the 14 charities with the largest legacy income in 2014 were CRUK, RNLI, RSPCA, Macmillan Cancer Support, British Heart Foundation, Salvation Army, National Trust, PDSA, Guide Dogs, RNIB, RSPB, Age UK, Marie Curie and Cats Protection.

We also heard from 18 charities of the 20 charities with an income of between £10 million and £25 million along with 34 charities with legacy income of less than £10 million.

We are very proud to represent so many fantastic charities and we hope that the Law Commission will give the ILM's response the weight that it deserves considering the number and importance of the charities that this response represents.

## 2. Disposals of charitable land

Charitable legacy income is very closely correlated to the value of UK house prices. This relationship is unsurprising given that often the major asset of an estate is the testator's house.

While only 39.2% of legacies are residuary gifts, these gifts represent 87% of income for the legacy sector and around a third of that 87% is from property sales.

Ensuring that legacy properties are sold at full value is therefore a vital role of charity legacy officers, who are well aware that achieving the best price for properties is crucial to maximising their charity's legacy income.

The Law Commission explore the workings of Part 7 of the Charities Act 2011 governing the disposal of Charity Land in chapter 8 of their Consultation Paper. The ILM absolutely agree with the Law Commission's view that the legislation is complex, inconsistent and costly to comply with.

The fact the Charities Act 2011 fails to adequately define Charity Land means it is not clear what transactions are subject to the Act and which fall outside it. Some charities such as Cancer Research UK have received advice that suggests that virtually all disposals are subject to Part 7 by virtue of the charities beneficial interest in the sale proceeds and what is coined "deemed appropriation". However it is probably fair to say that the majority of charities take a more relaxed approach to the disposal of legacy property and the application of Part 7. It is likely that some charities do not even consider that Part 7 applies to disposals of land left to them in Wills.

The confusion largely stems from the fact that when a charity is left a property as part of a legacy, it is almost always sold without the charity actually becoming the legal owner. Most of the time, a legacy property will be held on trust for the charity by the executors or trustees. This means that the charities' interest is not recorded on the register of title and therefore the disposal can take place without the purchaser's solicitor becoming aware of the charities interest and the requirement to comply with Part 7 of the Charities Act 2011.

Whether or not Part 7 applies to a transaction we are very confident that our members and the charities they represent always endeavour to secure the best possible sale price for properties. Where necessary they will obtain surveyors reports but they also have the skill and experience to sell properties successfully through estate agents.

We have asked our member a number of questions relating to property disposals and we hope that the answers will assist the Law Commission in understanding the way charities currently adhere to the law as well as giving them some an insight into how we feel the law might be improved.

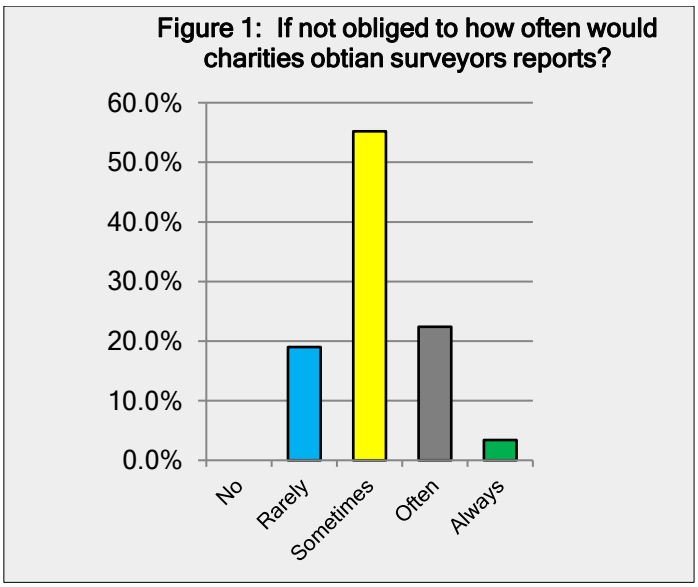
### 2.1. Should it be compulsory to obtain a "s. 119 report"?

The first question we asked members was whether they were broadly in favour of the Law Commission's proposal to replace the requirement to obtain a surveyors report compliant with the Charities (Qualified Surveyors' Reports) Regulations 1992 with a requirement to obtain advice from a person who they reasonably believe has the ability and experience to provide them with advice in respect of the disposal.

Our members were resoundingly in favour of the proposal with 89% of those who responded confirming they were in favour.

We then asked members how often, if at all, they would obtain reports from qualified surveyors even if the need to do so was abolished.

Figure 1 below shows that every member who responded will continue to at least sometimes obtain reports from qualified surveyors. This begs the question of when is it appropriate to gain a surveyors report? The answer is probably that a report should be obtained whenever it is believed to be of assistance and 84.2% felt that they were capable of correctly deciding when to obtain a surveyors report. The fact that legacy officers are able to determine when a report is beneficial seems to us to prove that they need not be compulsory.



**2.2. What are the benefits of obtaining a report prepared by a qualified Chartered Surveyor?**

Respondents confirmed that surveyor's reports can assist when deciding how to market a property. This presumably is because occasionally a report might encourage that certain properties are suitable for auction as opposed to sale by private treaty.

A further benefit was that reports can help identify any issues with a property which may justify accepting a lower offer.

The other main reason given was that they were helpful in exploring how to take advantage of development opportunities and legacy officers are quick to seek advice where they have a notion that opportunities exist.

**2.3 What did members see as the negatives of being complied to obtain a report prepared by a qualified chartered surveyor?**

Unfortunately due to a formatting error respondents were only able to select one of a number of negatives but the responses are nonetheless revealing about members views.

The most popular answer (30% of respondents) was that reports are often obtained after the property has been marketed and an offer has been made and that the valuation given in the report is normally the same as the offer. The reason that reports are often obtained at this late stage is that they follow an appropriation made to avoid CGT which invariably means an offer has already been made significantly in excess of the Probate value.

There was strong evidence that reports are usually obtained simply to comply with the legislation rather than because there is any inherent value in the report itself. While only 7% of respondents said that the expense of reports was the main negative the fact that they are obtained simply to comply with the legislation confirms that charities are wasting resources obtaining these reports.

The second most common response (28%) was that reports can cause ill feeling from executors who do not understand that they are required. We feel that the popularity of this response may reflect the fact that both charities and executors do not feel that the reports add value.

The third most frequent response (19%) was that the reports can cause considerable delays. This is again likely to reflect the fact that reports are often obtained following an appropriation when an offer is already on the table and the report is simply being obtained in order to comply with legislation. Where reports are obtained prior to marketing the property it is unlikely that a delay would be caused.

A further 11% of respondents stated that the most significant negative was that the reports were not value for money since they rarely revealed more than an estate agents valuation.

Thankfully many respondents (30%) made use of the option to reveal other negatives of the report to state that that all of the reasons listed were significant negatives.

The view of members seems to be that reports are often of no use as they are only obtained because they are a requirement following appropriation. However as we have seen in the response to previous questions members do identify that surveyors reports can be of use in appropriate circumstances.

**2.4 What is the cost to charities of complying with Part 7 of the Charities Act in relation to legacy properties?**

We asked members to estimate the cost and time of complying with the legislation in its current form. One of the difficulties charities faced answering this question is that reports are often paid for by executors from estate funds so no figures are easily available to individual charities. A further difficulty is placing a value on the cost of employees and trustees time considering the reports.

We were therefore pleased that 38 charities attempted to provide a response to the question although only some of these respondents gave figures. The highest amount reported as being spent on reports was £60,000 with others spending varying amounts which are likely to be roughly in proportion to their income.

The highest figure given for the internal cost of compliance was £80,000 and while no means universal, on the whole charities suggested that the internal costs exceeded the cost of the reports themselves.

Interestingly there was a great variation in the amount of time estimated as being required internally to comply with the legislation. One charity estimated 3 hours per report while another just 15 minutes.

What is clear is that considerable sums are being spent complying and given that charities often feel that obtaining reports has no purpose beyond complying with the legislation much of this money is effectively being wasted.

**2.5 How do charities comply with Part 7 of the Charities Act?**

Prior to conducting our survey we were conscious that there was considerable variance in how charities complied with the Act. We knew that decisions were often made by legacy officers rather than trustees and we wanted to convey that message. We also felt that the Consultation paper failed to consider whether trustees should be able to delegate decisions about property sales to employees and legacy officers in particular.

We asked charities whether their trustees always considered s.119 reports prior to a property being marketed. It was perhaps surprising that as many as 13% of charities claimed that this was the case. The fact this number is so low probably reflects not only the fact that trustees are not interested in considering reports at this stage but also ,as mentioned previously, the fact that reports are often obtained after the property has been

marketed and an offer been made. We perhaps expected more yes's from smaller charities but that was not the case with there being no correlation between the extent to which trustees considered reports and charity size.

Trustees are a little more likely to consider reports before an offer is accepted with 29.5% of charities saying that this usually happens. There is a further increase in the number of trustees who consider reports before contracts are exchanged but it is still only 32.6%.

However, it seems that while trustee may have sight of reports prior to completion it was established that trustees make the decision to accept an offer at only 18.6% of charities we heard from.

A number of charities (33.3%) attempt to comply with the requirement that trustees consider s.119 reports by producing a schedule of all the decisions made on disposals of property.

**2.6 Are Trustees best placed to make decisions relating to the sale of charity property?**

We were interested to hear our member's thoughts about who should make decisions relating to the sale of legacy property.

We asked our members whether they felt better placed to make decisions relating to the sale of a legacy property than their trustees. There was overwhelming agreement (85.7%) that legacy officers are better placed than trustees to make decisions about the sale of legacy properties.

Indeed 97.7% of respondents said that trustees should be able to delegate all decisions relating to the sale of legacy property. Having said that respondents were slightly less equivocal (64.3%) about whether trustees would prefer legacy officers to make decisions. This is likely to be because in some instances charity's have property teams who make these decisions.

Our final question relating to delegation of powers in relation to sales of property asked respondents to describe the processes that they have in place in relation to legacy property. Of those that responded most said that decisions had already been delegated to either the Head of the Legacy Team or to their charity's property specialist.

It seems very clear that our members' charities are already pragmatic in their interpretation of the current legislation and that the involvement of trustees in property disposals is kept to a minimum.

**2.7 Protection for purchasers of charity property**

Paragraph 8.98 of the Consultation Paper gives the impression that wherever a charity acquires a property a restriction will be entered on the register of title. However, as mentioned at 2.1 that is often not the case with legacy property.

Whether the property has been appropriated to the charity to avoid CGT or passed automatically to the charity on the death of a life tenant the property will be held on bare trust for the charity. The register of title will have no record of this and therefore purchasers might not be aware that the property is "owned" by a charity and that the transaction could be voided if Part 7 has not been properly complied with.

Only 36.6% of respondents said that they always ensured that the statement of compliance with Part 7 was included when the property was disposed. We failed to ask whether they believed that solicitors acting in the sale knew of the necessity to include this statement but given that so few of our respondents knew this, it does not seem unreasonable to assume that many solicitors were also unaware of the requirement.

Finally we asked respondents if they had concerns about the level of protection afforded to purchaser of charity land. While only 5.1% of respondents said this concerned them the vast majority (79.5%) said they had not considered this.

The importance of including the statement of compliance has been expressed to some members by their legal advisors but it is fair to say that many charities are not alert to the need to ensure that the certificate of compliance (s.122) is included in the contract for sale.

The fact that when disposing of legacy property the charity's interest in the land is often not included on the register emphasises the slightly different nature of disposals of charity legacy property. We believe that legacy properties should not be subject to Part 7, if not for charities then for the sake of purchasers. This is a change we would strongly advocate if the proposals to remove Part 7 are not adopted by Government.

**2.8 Other ways of reducing the burden of Part 7 on charities with respect to Legacy Properties.**

When considering how to respond to the consultation the ILM had conversations with a number of solicitors and interested parties. One suggestion that was considered was that an exemption from CGT should apply where the proceeds of the asset are legally due to a charity in much the same way that the exemption from IHT applies. This suggestion was well received by respondents with 95.3% of respondents being in support of this proposal. This proposal would have benefits with regard to the sale of investment portfolios and other assets where currently the only way to avoid CGT is by appropriation.

Another suggestion made was that Part 7 should not apply to residential property. This was not put to respondents as it was suggested after the survey had been published but there is merit to the suggestion and it would greatly reduce the burden of the legislation.

**2.9 The "Connected Persons" Test**

The Law Commission propose that the connected person test be removed altogether on the basis that it is implied within general trust law. The Law Commission not only propose the removal of the test altogether but also propose that if it is retained the definition of "connected person" test should exclude (1) a charity's wholly-owned subsidiary company;

and (2) a trustee for a charity who is not also a “charity trustee”, as defined by the Charities Act 2011.

We asked our members a number of questions relating to the connected person test to see to what extent they complied with the legislation and also to establish if they were in favour of it being removed.

We began by asking if charities were aware that the approval of the court or Charity Commission was required when disposing of a property to a connected person. While it was reassuring that most charities were aware of this almost a quarter (22.6%) admitted to not being aware of this.

Even more significantly 49% of charities do not carry out checks to establish whether a purchaser is a “connected person”.

Another area of particular confusion was around the definition of “donors of land” and their relatives.

Two thirds (68% of respondents) confirmed that they were aware that a “connected person” included a donor of land and the spouse, civil partner, child, parent, grandchild, grandparent, brother or sister of trustees of a donor of land.

However, only 37.5% of respondents thought that this included the spouse, civil partner, child, parent, grandchild, grandparent, brother or sister of trustees of the testator who had left the property in question. While just 26.2% of respondents thought that the spouse, civil partner, child, parent, grandchild, grandparent, brother or sister of trustees of another supporter who had left a property to the charity would qualify as “connected persons” for the purposes of the Act.

Whether or not charities are breaching the law by not obtaining the approval of the Charity Commission before agreeing sales to relatives of supporters who have given land to the charity is unclear. What is clear is that our members are willing to allow this and if the “connected person” test is not removed then clarity is needed as to whether it is permissible. It might also help if some explanation was given as to why this approval is so required and what test might practically be used to identify when a purchaser is a “connected person” by virtue of the donor of land clause of the Act.

Having considered the definition of “connected person” we then asked respondents to let us know if they were in favour of the Law Commission’s proposal to remove the “connected person” test altogether. We were pleased to see that 83% of respondents favoured the requirements being removed. Furthermore respondents were also in favour of the definition excluding donors of land and their relatives if the “connected person” requirements were not removed in their entirety.

Ultimately it must be the case that the important question is whether property and land is being sold for full value. The identity of the purchaser is all but irrelevant where that is the

case and we are therefore very supportive of the Law Commission's suggestion that the connected person test be removed entirely.

### 2.10 Conclusions

ILM members and their charities are very vigilant to the need to obtain full value from the sale of legacy property and ILM training and guidance very much promotes the importance of getting multiple valuations and subjecting the property to the open market. Many legacy officers would say that "adding value" by maximising the return from properties is one of their most important roles.

The ILM and its members would welcome the Law Commissions proposal to remove the connected person test and it we would equally welcome the removal of the obligation to obtain a surveyors report.

We also believe that if authority is delegated to them by their trustees, legacy officers are extremely well placed to make appropriate decisions relating to the disposal of charity legacy property.

The most important thing for our members is that there is clarity as to what transactions are subject to the legislation and what requirements result from it. We feel strongly that the sale of legacy property does not need to be subject to the same level of regulation as the disposal of other charity land. We would therefore encourage distinguishing between land where the charities' ownership is recorded on the title register, and land in which the charity has a non legal interest or perhaps distinguishing between residential and non residential property.

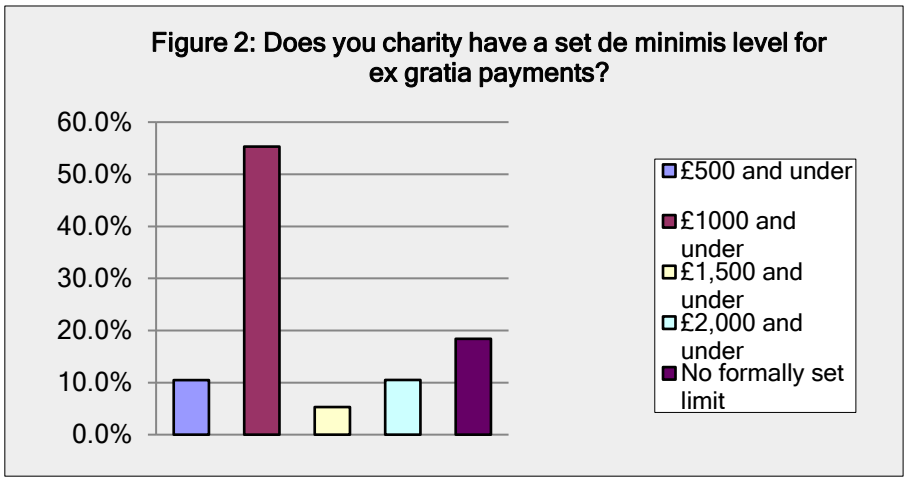
Finally we hope that consideration might be given to creating an exemption from CGT where the sale proceeds of assets are legally due to a charity. Charities are of course already exempt from CGT and it makes sense that assets can be sold by executors without the need for appropriation.

## 3. Ex Gratia Payments and s.106 of the Charities Act 2011

The ILM was very pleased that the Law Commission included a consideration of Ex Gratia payments in the consultation. While technically not the sole domain of legacy teams the Charity Commission confirm that almost invariably ex gratia requests relate to legacies.

For a number of reasons very few requests actually make it to the Charity Commission each year. This is mainly because our members are well versed on the wording of s.106 and know that the Charity Commission will only approve applications where it is clear that a moral obligation exists. Our members also save their trustees from having to make decisions by only asking their trustees where they believe that they will feel a moral obligation to make the payment.

However perhaps the main reason is that our members rely on the Charity Commission's declaration that they happy for charities to make small payments without their approval. Figure 2, below, shows that most charities have set an internal limit below which they will approve payments without application to the Charity Commission.




### 3.1 Who decides whether to approve de minimis ex gratia payments?

We asked respondents if these decisions were always taken by trustees even and 84.2% said that was not always the case even though the legislation is clear that it is the trustees who must feel a moral obligation.

### 3.2 Is reform actually needed?

Whilst discussing how to respond to the Law Commission, we heard from one prominent solicitor in the legacy sector who felt that we should be wary of encouraging reform. This advice was made on the basis that we can already act in the best interests of our charities whilst also being able to use the legislation to say that we could not approve requests.

It is true that legacy officers regularly respond to requests by setting out the extensiveness of the process and the likelihood that the Charity Commission will not approve the request. However the legacy sector also suffer from the lack of clarity over what is, and what is not permitted under s.106.

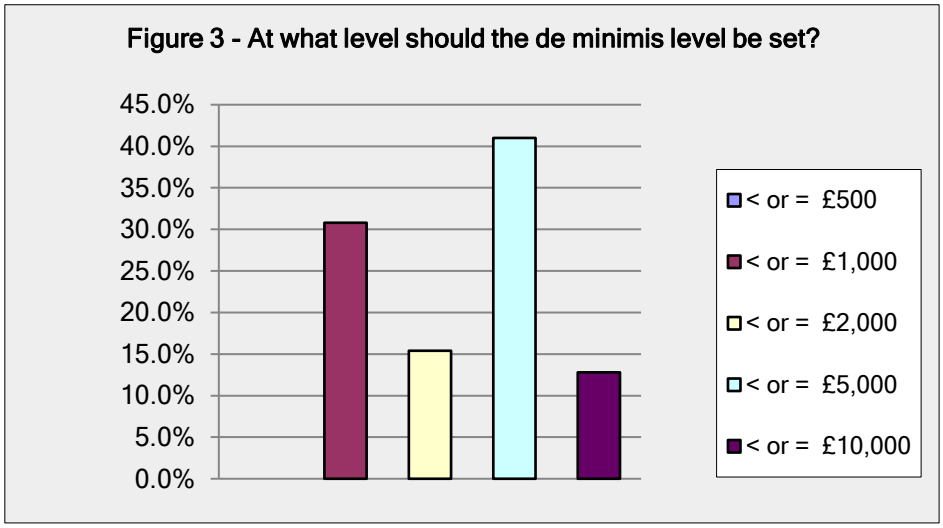
We therefore asked respondents "Do you feel the current legislation in conjunction with the Charity Commission's approach to de minimis payments always allows charities to make decisions in their best interests?" The fact that 67% of respondents felt that the current position allowed charities to act in their best interests to some extent supports the views of the solicitor we had discussed this with.

Even though the majority feel that they can already do what they need to, there was overwhelming support (97%) for the Law Commission's proposal that a formal power is introduced allowing charities to make small ex gratia decisions without the approval of the Charity Commission.

This support is despite 30% of respondents expected that the proposal would lead to an increase in the number of ex gratia requests and 56% admitting some degree of concern that it would be harder to reject requests.

### 3.3 What would be the appropriate threshold for charities to be required to receive Charity Commission approval?

The Law Commission asked consultees to provide them with their views on the appropriate level for this threshold we therefore asked this question of our members.




We are conscious that we may have unfortunately anchored respondents to a low level by not offering far higher options such as £50,000, £100,000 and £500,000. It would have been interesting to see how answers would have differed were these options offered.

With respect to the threshold we were interested to read Cancer Research UK's response to the Law Commission. We think that there is a huge amount of merit in their suggestion that rather than having a threshold at which the approval of the Charity Commission is required, there should instead be a move to a model where the Charity Commission is available when to assist trustees with more challenging requests leaving trustees to make easy decisions irrespective of value.

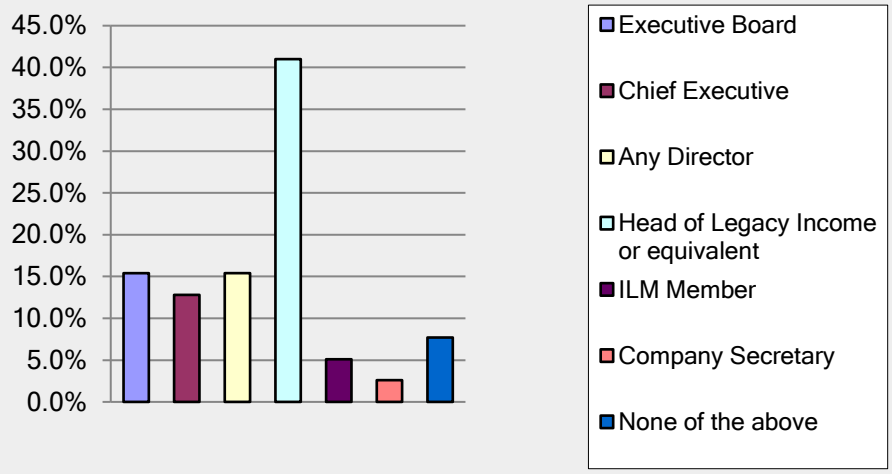
We have set out our member's views on the appropriate threshold in figure 3 above. From this you can see that 50% of members want the threshold to be at least £5,000. We would urge the Law Commission to give charities the largest threshold possible and certainly welcome the Minister having the power to change the threshold using secondary legislation.

### 3.4 Delegation of Ex Gratia decisions

We earlier reported that 84.2% of legacy officers approve ex gratia payments without reference to their trustees. It is therefore not particularly surprising that 87.2% of legacy officers think that trustees should be able to delegate this decision to employees of the charity.

We also asked respondents who they thought the decision making on property sales should be delegated to. We had intended to make this a multiple choice question but unfortunately the formatting of the survey only allowed one selection. Figure 4 is nonetheless an indication of who members feel it would be appropriate to delegate the decision to. We can't be certain but we suspect that every one of the options would have seen more selections had the multiple selections been available. It therefore seems that charities would like to see the Head of the Legacy Team have the authority to make these decisions.

**Figure 4: To who should trustees be capable of delegting ex gratia decisions to?**



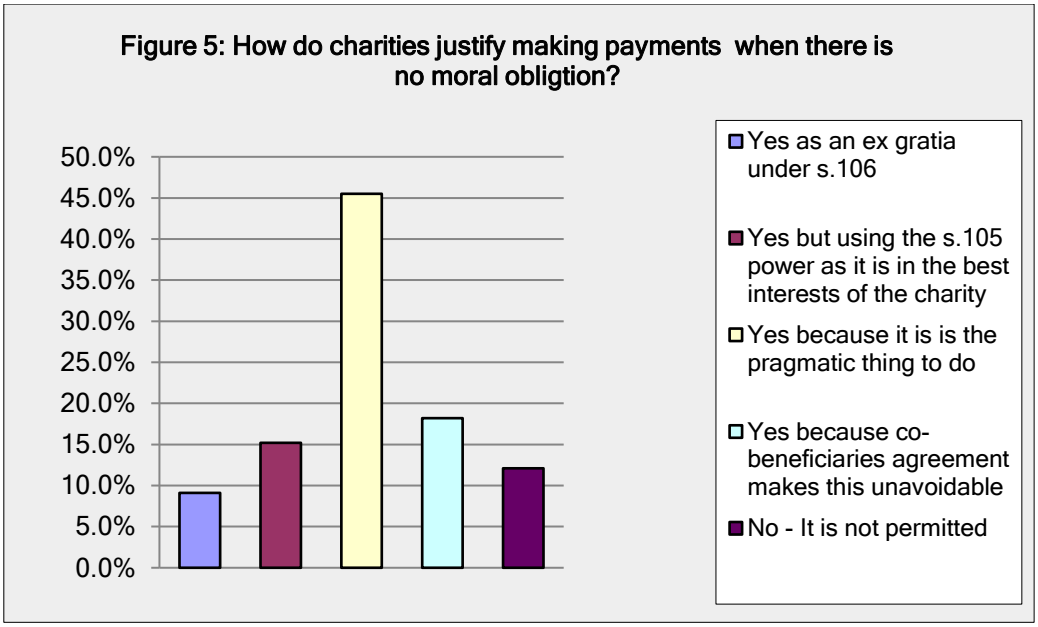

The impression given when speaking to members is that many trustees are bemused at being asked to consider ex gratia decisions. The vast majority of decisions are relatively small and trustees feel that their time is being wasted considering them. We understand that on one occasion one of the trustees of Cancer Research UK quite seriously asked if a 0 was missing when being asked to consider an ex gratia request for £5,000.

### 3.5 Is moral obligation the right test?

69.4% of respondents confirmed that they came across situations where despite there being no legal duty or moral obligation to agree to a request for a payment ,they nonetheless felt that that it was in their charity's best interests to agree to the payment.

Respondents were then asked what they did in these circumstances and the results are shown in figure 5 below. Our results show that 69.8% of charities make these payments despite the wording of s.106.

One member that we heard from was adamant that this was the purpose of s.105 of the Charities Act which allows trustees to make decisions which are expedient in the interests of the charity and 68.8% of respondents agreed that the s.105 power could be used in this way.




Whether or not s.105 was intended to be used in these situations is subject to debate but given the way it is worded it is hard to see why it should not be used in this way. Indeed, there is a persuasive argument that s.106 is unnecessary due to the power given in s.105 on the basis that wherever there is a moral obligation to make the payment it is invariably the case that making the decision would be expedient in the interests of the charity.

The issue is of course that there is no small payment regime in relation to s.105 and as far as we are aware the Charity Commission have issued no guidance similar to the guidance in relation to small payments under s.106.

It is therefore not a surprise that the most common answer given (45%) was that charities approve these payments because it is the pragmatic thing to do.

We did not ask respondents for examples of occasions when they would make the decisions highlighted in figure 6 however we would imagine that these would include requests for chattels with negligible value.

The legislation as it is currently written is far too inflexible and does not obviously permit charities to give items of “sentimental” value to friends and relatives of supporter’s who have left them a legacy. An argument might be made that the cost of disposing of the items exceeds the value of the item itself but this is not watertight.

The truth is that even a peppercorn has value and charities can therefore only give these items away where there is a moral obligation to do so unless they have the consent of the Charity Commission under s.105.

Another situation which charities struggle with is the payment of lay executors where there is no charging clause. Often the hard work and dedication of these people saves charities considerable costs and it is not wholly unreasonable that they ask for some payment. These people are entitled to instruct professionals to carry out the work at great expense but when they do the work themselves for a fraction of the cost charities are unable to pay them for their work.

A further example which is not infrequent is when charities are asked to contribute to some form of memorial to the testator. If it is a headstone then there is probably a "moral obligation" and s.106 can be used effectively. However, when the headstone is more expensive or the request is more substantial, the moral obligation starts to be less certain.

**3.6 Should the power under s.105 be available without application to the Charity Commission?**

80% of respondents felt that this power should exist. The suggested limit was much the same as that suggested for s.106 with 50% of respondents wanting this to be at least £5,000. As we said in relation to s.106 we feel that respondent's answers here may have been unnecessarily anchored by the options given. On reflection we would have offered more options at the higher end of the spectrum such as £25,000 and £50,000. This would almost certainly have encouraged respondents suggest higher limits.

**3.7 Should trustees be able to delegate this s.105 power?**

The response to this question was an unequivocal yes with 91% of respondents agreeing that trustees should be able to delegate this power.

**3.8 Conclusions**

It is clear from the responses we have received that the current regime does not work effectively. Given that is the case our members strongly support the proposal to introduce an official power in relation to small payments under s.106 and that this power should be capable of appropriate delegation within the charity.

However, there is a strong argument that the proposals in the consultation paper are not the solution. We are in favour of charities being given unlimited powers to make payments which they believe are in their best interests. Like Cancer Research UK we believe that the Charity Commission will be needed to assist trustees when decisions are less straightforward but we do not think that there should be an obligation to obtain approval on straightforward decisions irrespective of value.

We feel it is very important that the Law Commission consider s.105. It seems to us important that any modifications to s.106 are replicated with respect to s.105. As we have said there is an argument to say that there is no need for s.106 at all given the existence of the s.105 power but there is no obvious harm in having both.

## Chapter 12: Charity Mergers

The Consultation Paper made some proposals that we felt were relevant to legacy officers and accordingly we asked our members views on these. We advised members that the Law Commission are proposing that when a charity has merged and that merger has been registered, then for the purposes of ascertaining whether a gift is made to that charity under section 311(2) of the Charities Act 2011 the charity should be deemed to have continued to exist despite the merger.

Somewhat unsurprisingly there was virtually unanimous (96.9%) support for this proposal. Having said that only 78.1% of those who responded thought that this change would give the charities the confidence to shut down shell charities.

## Further consultation

**If the Law Commission would like to discuss anything within this response we would be very happy to speak further with them.**

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