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The CATHOLIC WOMEN'S LEAGUE of CANADA

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MEMO

Date: August 30, 2023

Re: Updates to the National Manual of Policy and Procedure

Following are instructions for updating the *National Manual of Policy and Procedure* (2023). A digital, current and searchable version of the *National Manual of Policy and Procedure* is available free of charge on the League website at cwl.ca for those who choose not to maintain a paper copy.

Remove	Insert	Page/Line reference	Description of Change
77-81	77-81	Page 77, lines 19-32	Annual reporting procedures updated to current
			practice
171-179	171-180	Page 173, lines 19-21	Recognition that a third-party marketer collects, stores
		Page 174, lines 27-29	and uses member information to provide marketing
		Page 175, lines 25-26	message to those members who consent to contact
		Page 176, lines 39-40	
		Page 177, lines 1-3	

- any special emphasis needed...when...why
- 2 5. Be prepared to attend meetings, conferences and seminars on the topic, with prior approval of the chairperson.
- 4 6. Send information/communiques to the chairperson for circulation in order to avoid duplication of effort.
- 7. Send a brief report of the work accomplished to the chairperson according to *Executive Handbook* guidelines.
- 8 Operating expenses for a sub-committee chairperson are included as part of the expenses of the
- 9 appropriate chairperson. The chairperson should be notified of any perceived need. Sub-committee
- 10 chairperson's expenses must be approved by the chairperson and executive and will be included
- 11 under her budgetary allowance.
- 12 The sub-committee chairperson shall serve the same term as the chairperson. A second term may
- 13 be served at the discretion of the new chairperson and in consultation with the sub-committee
- 14 chairperson.

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Signing Officers

- 16 Signing officers shall be the president, the treasurer and the secretary. All cheques must be signed
- 17 by two of the signing officers.

GUIDELINES FOR ANNUAL WRITTEN REPORTS

- 19 Annual reports bring accountability and credibility to the achievements of each council and reflect
- 20 the work of all members across Canada. Annual reports are an important means of communicating
- 21 to others in the parish, community and country at large the activities that occurred over the past
- 22 year.
- 23 At the national level, the annual report is based on an annual report survey sent to parish councils
- in the fall parish council mailing, distributed by mid-October. The survey is open for parish council
- 25 input by November 1st and closes by December 15th. Councils having trouble entering their
- 26 information online may mail their report to national office, postmarked no later than December
- 27 15th.
- The process and method for compiling the annual reports at other levels and the deadlines for
- 29 doing so are set by provincial executives and communicated within their provincial council
- 30 according to the best practice in their region. Diocesan and parish councils should seek instruction
- 31 from provincial executives no later than September to ensure they have the instructions they need
- 32 to complete their portion of the annual report.

- 1 Annual Reporting Guidelines for Diocesan, Provincial and National Officers
- 2 All reports should be prepared in a concise, factual style, double-spaced, typed in Times New
- Roman 12-point font, with a word count of 1,800 to 2,000.
- 4 In preparing your report:

- Review the annual report summary of parish council activities provided by national office.
- Report actual activities, events or special projects.
 - Categorize members' and council involvement in charities and projects.
 - Include information from sub-committee chairpersons.
- Include new projects undertaken on a one-time basis with successful results.
- Report on the use of national resources, in particular new initiatives.
- When referring to an organization by name, person or title, make every effort to ensure the spelling is correct.
- Do not list every activity in the report summary. Instead, summarize the common activities and highlight one or two that were unique in some way.
- Recommendations and suggestions for the future should be general and simply stated.
- Highlight the activities of the chairperson.
- Do not include scripture, prayers or poetry.
- Do not include activities that pertain to other committees. For example, Canadian Catholic Organization for Development and Peace service; Coady International Institute social
- justice; Catholic Missions In Canada faith.
- If an activity relates to a resolution that has been adopted, the chairperson whose committee the action plan was referred to would report. The chairperson of social justice's annual report should include a list of actions taken by councils or members on current and previous resolutions. The list must include resolution numbers and titles.
- When you have completed your report:
- Read it again. Did you include all the information? Did you report exclusively on activities that occurred, with a brief mention of plans for the future?
- Check for accuracy in figures, spelling, typographical errors, grammar and punctuation.
- Be clear so that the reader will better understand.
- Add to it if a point was left out or an explanation is needed.
- Edit your report if it is longer than 1,800-2,000 words.

PARISH ACTIVITIES

- This standing committee is included in the *Constitution & Bylaws* to assist CWL parish councils in accurate reporting on parish activities vs. CWL activities to the diocesan president.
- 4 Parish activities may include fundraising, financial support to the parish or liaising and cooperating
- 5 with parish pastoral councils and/or other groups operating in the parish. These activities may
- 6 vary from parish to parish, depending on the size and nature of the council. The parish activities
- 7 standing committee comprises an elected chairperson at the parish level and, as such, is an optional
- 8 standing committee for any parish council.

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- 9 The parish activities chairperson, in consultation with the president and executive, shall complete
- 10 an annual report on her activities and forward same to the diocesan president. If no standing
- committee has been established, the president and her executive are responsible for reporting to
- the diocesan president. A sample parish activities report is printed in Appendix 3.

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QUORUM AT ALL LEVELS

- 3 Due notice having been given in all instances, the quorum for a regular meeting is:
- the regular and annual general parish council meetings shall be 10% of the voting members of
 the council
- a regular parish, diocesan or provincial executive meeting shall be a majority of the members of
 the executive
- a diocesan or provincial annual meeting of members shall be 10% of the voting members of the
 council
- a national executive meeting shall be a majority of the members of the executive
- a national annual meeting of members shall be 25 members of the national council
- 12 [C&B Part XIV Section 2, 3 & 4]

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MEETINGS

Meetings General

- 15 Members have a definite role to play while attending a meeting, whether presiding or participating.
- This role, to be effective, requires the formation of good meeting habits and knowledge of some
- basic parliamentary procedure. Meetings will run more smoothly and take less time if members are
- familiar with the proper procedures, using them in a fair and courteous manner. An added benefit
- 19 will be the feeling of satisfaction knowing that all members had the opportunity to take part in the
- decision-making process.
- 21 A partially-virtual meeting, where some participants attend in person and others participate
- 22 through a digital channel that allows participants to communicate adequately with each other
- 23 during the meetings, is permitted according to the Canada Not-for-profit Corporations Act.
- 24 Participants can vote digitally as long as the votes can be gathered in a way that allows them to be
- verified, tallied and presented while maintaining the anonymity of the voter.
- 26 Councils at all levels should acknowledge territory before all meetings, conventions and gatherings,
- i.e., "We acknowledge that we are on treaty (#) territory and the traditional homeland of the (insert
- 28 first nation) and the Metis nation, where applicable.
- 29 For more detailed information on meetings, please refer to Parliamentary Procedure, Executive
- 30 *Handbook* and *Leading the League*.
- 31 The president has the overall responsibility for most of the meeting preparation, however, details
- 32 can be delegated to other officers or members; there are specific duties for each officer, as well as
- duties for members. Everyone is expected to take an interest and share in the duties.
- 34 Ideally, members benefit from in-person meetings. Unforeseen circumstances such as fires, floods,
- 35 snowstorms, blackouts or epidemics may interfere with the ability to meet in person.

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PREAMBLE

- 3 The federal *Personal Information and Electronics Document Act* (PIPEDA) came into force January 1,
- 4 2004 and applies to personal information collected in the course of commercial activities. The
- 5 Privacy Commissioner of Canada has ruled The Catholic Women's League of Canada does not
- 6 conduct commercial activities and is therefore exempt from PIPEDA. Notwithstanding the
- 7 foregoing, the League strives to share with members how their personal information is protected in
- 8 the areas of management, notice, choice and consent, collection, use and retention, access
- 9 disclosure to third parties, security, quality, and monitoring and enforcement.

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MANAGEMENT

Policies and Communications

- 1. The League defines, documents, communicates and assigns accountability for its privacy policies and procedures.
- 14 2. The national executive is responsible for ensuring that a well-formulated privacy policy exists 15 to protect the personal information provided by all members and former members of The 16 Catholic Women's League of Canada.
- 17 3. The national administrative committee is responsible for ensuring that the League's privacy policies are monitored and updated regularly, including in its regular review of organizational governance.
- 4. The privacy officer is responsible for implementing the policy, monitoring compliance and initiating action to clarify policies and practices.
- 5. The privacy officer also trains and regularly updates employees about their responsibility and the consequences of non-compliance.
- 24 6. The privacy officer ensures that the privacy policy is documented and readily available to employees, members and relevant third parties.

Procedures and Controls

- 1. The privacy policy and procedures are periodically reviewed by the national administrative committee, ensuring consistency with all applicable laws and regulations. Any suggested modifications to the policy are recommended for approval to the national executive.
- The privacy officer governs the development, acquisition, implementation and maintenance of
 information systems and the related technology used to collect, use, retain and disclose
 personal information.
- 33 3. The privacy officer ensures that the hiring process includes procedures to screen for employees who would be diligent in protecting members' privacy.

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1 NOTICE

Policies and Communications

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- 1. The League provides notice about its privacy policies and procedures and identifies the purposes for which personal information is collected, used, retained and disclosed.
- 5 2. The League's privacy notice describes:
 - a. the reason for collecting personal information
 - b. the form of consent required
- 8 c. procedures used for collection
 - d. uses and retention of information
- e. methods of access by members
- f. required disclosures, including third-party users
- g. security of information procedures
- h. quality of information provided
- i. how the policy is monitored and enforced

Procedures and Controls

- 16 1. The League's privacy notice must be readily accessible and available when personal information is first collected from the member. It can be found:
 - a. in the membership renewal packages sent annually to parish council presidents with instructions that the notice be prominently displayed wherever the council is accepting renewals
- b. on the League's website
- 22 2. The privacy notice will be dated to allow members to determine whether the notice has changed since they submitted personal information.

24 CHOICE AND CONSENT

Policies and Communications

- 1. The League describes the choices available to the member and obtains implicit consent with respect to the collection, use and disclosure of personal information.
- 28 2. The League collects sufficient personal information to allow for the processing of a subscription to *The Canadian League* magazine. It is assumed that because the subscription is automatic, consent is implied when the membership fees are received. The information is used by employees and disclosed to a third-party mailing company to apply address labels to the magazine.
- 3. The League collects contact information for those who hold elected office at all levels of the
 League. It is assumed that because the member is willing to hold office, consent is implied to
 allow other members to contact her about League undertakings. The information is used by
 members only and disclosed to no other parties without the express written consent of the
 individual member.

- 4. The League collects educational information and personal goals for those interested in applying for League bursaries. It is assumed that because the member is willing to have a committee review her application to assess her credentials consent is implied when the bursary application is received. The information is used by the bursary committee only and disclosed to no other parties.
- 5. The League collects service history and personal interests for those interested in being awarded life memberships. It is assumed that because the member is willing to serve, consent is implied to allow national executive members to determine how to best ask the candidate to serve. The information is used by the national executive and the life member liaisons and disclosed to no other parties.
- 11 6. The League collects shipping addresses and credit card information for those interested in purchasing national office supplies either via telephone, fax or e-mail. It is assumed that because the member wishes to receive the order, consent is implied to allow for national office staff to process the payment and ship the order.
 - 7. The League collects and publishes photographs of members involved in League activities for use in internal League publications. It is assumed that members involved in League activities consent to having their photographs used in internal publications when League events or League sponsored events are being attended.
- 8. A third-party supplier of marketing services collects the names, email addresses and telephone
 numbers of members who explicitly consent to being added to a website information mailing
 list through cwl.ca.
- 9. Members will be informed of their right to "opt-out" in the privacy notice.
- 23 10. Consent may be withdrawn at any time by providing written notice to the privacy officer, and allowing a 30-day processing time. Members are informed of the consequences of refusing to provide personal information or of withdrawing consent for the purposes identified in the privacy notice.

Procedures and Controls

- 28 1. Implicit consent to collect, use and disclose personal information is obtained for all purposes identified in Policies and Communications.
- All members will receive the option to "opt out" of receiving the magazine by stating their intent
 to the membership chairperson at the parish level. An "opt out" box will be placed on the
 annual membership list.
- 3. It is presumed that those holding office will be accessible to sister members, that bursary applicants would wish to fully meet the criteria and that life members are choosing to be contacted in order to serve. For those reasons, no "opt out" provision is available. Instead, members with reservations should decline to serve/apply if they cannot meet these criteria.
- 4. If personal information is to be used for a purpose not specified in the privacy notice, express
 written permission must be obtained from the member. This is especially applicable when a
 council at another level wishes to disclose members' information to an external third party.

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COLLECTION

Policies and Communications

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- 3 1. The League collects personal information only for the purposes identified in the privacy notice.
- 4 2. The privacy notice discloses the types of personal information collected and the methods used to collect the personal information.
- 6 3. The League uses personal contact, and in some instances League approved forms, to collect personal information. No information is obtained from external third parties or by way of Internet cookies and other tracking techniques.

Procedures and Controls

- 1. Personal information for all members includes the member's name and address and is added automatically by the membership database is the year joined, the years paid and the years of service of each member. Information is collected by internal third parties, i.e., the member assigned to collecting per capita fees within the parish. Parish councils are responsible for ensuring that the information is collected by fair and lawful means.
- Contact information for parish council presidents and treasurers, and diocesan, provincial and national officers includes telephone numbers and e-mail addresses, where available.
 Information for parish council presidents and treasurers is collected and mailed along with the annual membership list. Information for diocesan, provincial and national officers is collected at the first executive meeting following election and forwarded to national office for distribution.
- Information for use in tracking re-applications for bursary awards is collected from the results
 of the bursary committee meeting and is obtained directly from the applicant when completing
 the form.
 - 4. A history of executive positions held at diocesan, provincial and national levels that is used to verify life membership applications is collected from the contact information received in 2 above. Life membership information is collected from both the submitting council and the member nominated.
- 5. A third-party supplier of marketing services collects names, email addresses and telephone numbers of members who explicitly consent to being added to a website information mailing list through cwl.ca directly from members.

30 USE AND RETENTION

Policies and Communications

- 1. The League limits the use of personal information to the purposes identified in the privacy notice and for which the individual has provided implicit consent.
- 2. The League retains personal information for only as long as necessary to fulfil the stated purposes.
- 36 3. Members will be notified of the use and retention of personal information in the privacy notice.

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Procedures and Controls

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- 1. National office staff will not disclose the information on record for any "non-executive" member without the express consent of the member. This includes inquiries from sister members. The only exception will be the mailing of the annual membership lists to allow the membership chairperson an opportunity to ensure that the record is both complete and accurate. The membership chairperson, as the keeper of personal information, is also bound by the privacy notice.
 - 2. National office staff will disclose the contact information on record for executive members in accordance with the established protocol of the League; i.e., members to parish council presidents, parish council presidents to diocesan presidents, etc.
 - 3. The membership database will include "anonymous subscriber" records for members who wish to "opt out" of obtaining the magazine. Each record will count as one member for the membership statistics, but no subscription information will be collected or retained in order to mail the member her copy of *The Canadian League*. The parish membership chairperson will be expected to retain enough personal information on anonymous subscribers, on a confidential basis, to allow for annual renewal of membership.
- 4. Information on members is stored with a professional IT service provider in Toronto. Hard copies of membership lists are shredded after two years.
- Information on life members is kept on file as long as they remain members of the League.When no longer needed, the information is shredded.
- 21 6. Information on bursary applicants is kept for a five-year period, after which the information is shredded.
- 7. Information on orders is retained electronically until the end of the fiscal year when completed orders are purged. Hard copies are retained for seven years.
- 25 8. The personal information of members who consent to being added to the mailing list of the League's third-party supplier will be retained until such time as they opt out of the mailing list.

27 ACCESS

Policies and Communications

- 29 1. The League provides individuals with access to their personal information for review and update.
- Members will be notified of their right to access personal information in the privacy notice, andthe procedure for doing so.

Procedures and Controls

- 1. Members have two methods for accessing their personal information. They can request to see the membership list from the membership chairperson. The membership chairperson is authorized, on behalf of all members in her council, to modify personal information contained on the membership list when disparities or inaccuracies are noticed, via telephone, fax or e-mail.
- 2. Members may also contact national office in writing to obtain a copy of their personal information. The requests should be sent c/o the privacy officer, and responses should be

- received within 45 days of the original date of the request. All requests should include a selfaddressed stamped envelope in which to return the information.
- 3 3. A member's identity is confirmed prior to providing access to the personal information by comparing the return address to the membership database.
- 5 4. All validated members' requests will be honoured.
- 5. Members may call in modifications to their personal information at any time, with the exception of modifications to diocesan, provincial and national offices held. Any suggested modifications to offices held must be supported by a letter from the current council executive, signed by the council secretary and president and supported by executive listings from the years in question.
- 6. Because national office staff is required to make information changes on behalf of the members, a record of the date, time and identification of the member making a modification will be kept.
 - 7. If a disagreement arises about the accuracy and completeness of the personal information, either between national office and the member, or the membership chairperson and the member, the member will be informed in writing about the reason a request for correction of personal information was denied, and that an appeal could be made to the national administrative committee.

DISCLOSURE TO THIRD PARTIES

Policies and Communications

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- 1. The League discloses personal information to third parties only for the purposes identified in the privacy notice and with the implicit consent of the member.
- 2. The League communicates its privacy policy to all identified third parties and obtains written agreements from these parties that its practices ensure the security and confidentiality of the personal information given.

Procedures and Controls

- 1. The only identified third party that requires members' personal information is the mailing company, entrusted with labelling magazines for the post. The personal information forwarded includes only members' names, addresses and the council to which they belong. These records, sent on disk, are promptly returned following the labelling process. No information is retained by the mailing company.
- 2. A contract exists between the mailing company and the League that members' personal information will be protected from loss, misuse, unauthorized access, disclosure, alteration (with the exception of an address accuracy check required by Canada Post) and destruction. The contract stipulates that the level of protection is equivalent to that of the League and limits the use of the personal information to purposes necessary to fulfill the contract.
- 3. Should the need arise to disclose personal information to additional third parties for new purposes or uses not outlined in the privacy notice, members will be informed in *The Canadian League*, at least six months in advance, and consent will be implied. Written requests to "opt out" will be accepted.
- 4. A contract exists between the third-party supplier of marketing services and the League that protects members from sale, loss, misuse, unauthorized access, disclosure, alteration and

- destruction. The contract stipulates that the level of protection is equivalent to that of the League and limits the use of the personal information to purposes necessary to fulfill the contract.
- 4 5. For external and identified third parties, the privacy officer will:
 - a. monitor complaints to identify indications of any misuse of personal information by third parties
 - b. respond to any knowledge of a third party using or disclosing personal information in variance with the League's privacy policies and procedures and contractual arrangements
 - c. mitigate any harm caused by the use or disclosure of personal information by an identified third party in violation of the League's privacy policies and procedures
 - d. take remedial action in the event that a third party misuses personal information
 - 6. For internal unidentified third parties (i.e., councils at other levels), the privacy officer will:
 - a. inform the third party of its breach of policy and request that it immediately cease using the information
 - b. request that the third party retrieve any personal information circulated
 - c. inform the third party that it must contact each member whose personal information has been disclosed and take appropriate remedial action to mitigate any harm

18 SECURITY

Policies and Communications

- 1. The League protects personal information against unauthorized access.
- 2. Members will be notified of the types of security measures used to protect their personal information.

Procedures and Controls

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- 24 1. Only authorized national office staff has access to personal information through the application of user names and passwords.
- 26 2. All changes to personal information are dated and include the name of the user who has modified the record.
- 28 3. Information on members is stored with a professional IT service provider in Toronto.
- 4. The file server is accessible by national office staff through a series of security names and passwords.
- 31 5. Hard copies of the membership lists are placed in locked filing cabinets.

32 QUALITY

Policies and Communications

- 1. The League endeavours to maintain accurate, complete and relevant personal information for the purposes identified in the privacy notice.
- Members will be notified of the League reliance on the membership chairperson to supplyaccurate and complete personal information for their council members.

Procedures and Controls

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- 2 1. National office relies on the membership chairperson to systematically update and maintain relevant, accurate and complete personal information on her council members, submitting changes to national office on a timely basis.
- 5 2. The membership chairperson does so by maintaining regular, periodic contact with each member, at least once annually during the membership renewal drive.
- 7 3. Postal codes are verified using an address accuracy program provided by Canada Post.

MONITORING AND ENFORCEMENT

Policies and Communications

- 1. The League monitors compliance with its privacy policies and procedures and has procedures to address privacy-related complaints and disputes.
- 12 2. Members will be notified of how to contact the privacy officer with complaints.

Procedures and Controls

- 1. The privacy officer will address all privacy-related complaints and disputes, once notified of the complaint or dispute in writing, using the procedure outlined in Disclosure to Third Parties on page 177.
- 2. Should the complaints and disputes not be resolved satisfactorily, the complainant may appeal to the national administrative committee for resolution.
- 3. All complaints and disputes will be reviewed periodically by the laws chairperson in concert with the annual revisions to the *National Manual of Policy and Procedure*, with suggested changes to be raised at the winter executive meeting.
- 22 4. Compliance with privacy policies and procedures is examined annually.

BENEFITS OF USING BLIND CARBON COPY

- 24 For security and privacy reasons, it is best to use the "blind carbon copy" (BCC) feature when
- sending an e-mail message to a large number of people. When e-mail addresses are placed in
- the BCC field of a message, those addresses are invisible to the recipients of the e-mail.
- 27 Using the BCC field to send an e-mail message to a large group of people has a number of benefits,
- 28 including:
- 29 1. The privacy of e-mail addresses is protected in the original message. The recipients will receive a
- 30 copy of the message, but they will not be able to see the addresses of the recipients listed in the BCC
- 31 field.
- 32 *2. The privacy of e-mail addresses is protected if the message is forwarded.* When an e-mail message
- 33 is forwarded, the addresses of everyone in the TO field and the CC field are also forwarded along
- 34 with the message. Addresses that have been placed in the BCC field are not forwarded.
- 35 3. If a recipient uses the "Reply to All" option, the reply will not be sent to those individuals in the BCC
- 36 field. Occasionally an e-mail recipient may respond to a message using the "Reply to All" feature. If
- 37 the TO or CC field in the original e-mail contains a large list of recipients, all of them will receive the
- reply. This can be an annoyance to other recipients, particularly if the reply is not relevant to them

- or was intended only for the original sender. Placing recipients in the BCC field protects them
- 2 against receiving unnecessary replies.
- 3 4. Using the BCC field acts as an anti-spam precaution. Many viruses and spam programs are now
- 4 able to sift through mail files and address books for e-mail addresses. Using the BCC field is an
- 5 effective anti-spam precaution because it reduces the likelihood that recipients will receive a spam
- 6 message or a virus from another recipient's infected computer.
- 7 **Note:** Make certain to include an address in the TO field after listing the recipients in the BCC field.
- 8 **Note:** When using BCC, be sure to indicate to whom the e-mail is being sent in the body of the e-
- 9 mail. (e.g., This e-mail is being sent to all provincial officers, diocesan presidents and diocesan vice-
- 10 presidents).
- Note: Forwarding: If forwarding an e-mail that has the addresses of prior recipients in it (the
- address is there, even if only the names are listed on the TO or CC line), first remove all prior e-mail
- 13 addresses.
- 14 Note: It is the policy of national council that, "When sending information electronically by mass
- mailing, the originator will use the blind carbon copy (bcc) feature to hide the individual e-mail
- 16 addresses."