

THE INTERNATIONAL WOMEN'S CLUB - BERMUDA

Standing Rules

IWC Standing Rules

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STANDING RULES

Introduction- What are Standing Rules?

Standing Rules – are the general administrative policies, procedures and guidelines that are to be followed by the Board and all members of the International Women’s Club (the “Club” or “IWC”).

The Constitution and Bylaws as drafted at the Club’s inception and amended from time to time, governs the Club’s mandate and structure and should rarely be changed.

The Standing Rules are established over time, and may be changed as needed to reflect changes in club administration and/or changes in legislation or international standards.

The Document is split into two sections:

1. **Members’ Rules** – policies, procedures and guidelines that apply to all members of the Club; and
2. **Board and Committee Rules** – those policies, procedures and guidelines that apply to the Board, its committees or activities.

Members' Rules

Rules that apply to all members

Ethical Standards

In accordance with the Bylaws, the Club requires its Board and all members to observe high standards of ethical conduct in the execution of their duties and responsibilities and while participating in Club meetings, events, and activities, as outlined in the Constitution, Bylaws and Standing Rules. This also includes when using IWC communication platforms, the website or other social media platforms.

Confidentiality

Members shall not disclose personal information held by the Club other than with the consent of the person concerned and/or with persons who have a legitimate or legal need for such information. (Refer also to **Privacy Policy** and **Social Media Policy**, below).

Conflicts of Interest

1. A club member who has a conflict of interest shall disclose such conflict of interest, and in cases where that conflict of interest impedes her ability to act in the best interest of the Club, the member may be asked to excuse herself from the discussion and/or be excused from the vote.
2. Presumption of Conflict - A member is presumed to have a conflict of interest when she or her family has a financial interest in, or has close ties to, a business, organization or charity being considered by the Club.
3. Members may not be paid for their services, either in cash, or "in kind".
4. Members may not solicit business from other members (including handing out business cards) during Club meetings, events, and activities or on official IWC social media platforms.

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Indemnification

The Club agrees to indemnify, defend and hold harmless, the Board, its Officers and its members who serve or have previously served on the Board or on Club committees, from and against all liability, loss, cost or expenses (including attorney's fees) by reason of liability imposed upon them, arising out of or related to Club activities whether caused by or contributed to by the members, or any other party indemnified herein, unless caused by the sole negligence of the member or any other party indemnified herein.¹

Discrimination

The International Women's Club is committed to providing an inclusive and welcoming environment for all its members at all times during official Club meetings, events and activities. The Club will not tolerate discrimination against any person based on, but not limited to, race, colour, religion, national origin, disability, age, sexual orientation, or political affiliation.

Anti-Bullying

Bullying shall not be tolerated within the Club. Bullying occurs when a person or group of people repeatedly behaves unreasonably towards another person and the behavior causes, fear, distress and/or harm to another person's body, feelings, self-esteem or reputation.

Bullying behavior may include, but is not limited to, the following:

- Aggressive or intimidating conduct
- Belittling or humiliating comments
- Spreading of malicious rumours
- Continued teasing, practical joking, or requiring "initiation ceremonies"
- Continued posting of requests or unreasonable comments on social media
- Unreasonable volunteer expectations, including too much or too little activity
- Displaying of offensive material
- Pressure to behave in a manner that may be uncomfortable to others

¹ This is typical boilerplate language that is used when drawing up new bylaws for non-profits and organizations for the protection of anyone who is serving on the Board or its committees. Essentially it means that the IWC as an organization will defend and not blame anyone who is serving on the Board or on its committees, or other leadership roles while carrying out her duties in accordance with the Constitution, Bylaws and Standing Rules. The IWC will cover any costs or expenses ("indemnify") that may be incurred, including legal fees. Note - if the IWC has insurance coverage, such amount would be capped by the maximum amount as provided for under the insurance policy. If not covered by insurance, the amount would be capped to available funds held in reserve by the Club. The Club will not cover expenses where the action of a member is illegal or as a result of her negligence.

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In the event of a bullying complaint or allegation, members should follow the Conflict Resolution and/or the Complaints procedures (below).

Conflict Resolution

From time to time members may have differences of opinion. Before filing an official Complaint, we ask that you:

- Remind yourself – what is the primary purpose and objective of the Club?
- Have you tried to understand the issues of the other party(ies) from their stand point?
- Have you attempted to resolve the issue privately and respectfully yourself/ves? If you are not comfortable in doing this, please reach out to a board member for direction or assistance.
- Can you agree to disagree and move on?
- Will filing your complaint serve the better interests of the Club?

Complaints

Before making a decision to file a Complaint, members are asked to first review the Conflict Resolution Procedures (above).

1. Complaints should be submitted in writing to the Secretary at secretary@iwcbda.com with:
 - a. full details of the Complaint and
 - b. an outline of the steps that have already been taken to attempt to resolve the issue.
2. The Secretary & President (or if there is a conflict of interest, another Board member) shall attempt to resolve the complaint directly, if practical and reasonable to do so.
3. If unable to resolve the matter directly, the President, in consultation with the Board, may call a **Complaints Review Committee (“CRC”)** to be made up of three objective and impartial members. (Where possible, one of whom shall be a past president or officer of the IWC). Note – in such cases, the President and Board should be mindful to share only such information as needed in order to keep information confidential and not create unnecessary bias in case an appeal decision is needed later.

If necessary, the President, in consultation with the Nominations Committee, shall appoint members for the CRC.²

² EXPLANATION – Remove the requirement to appoint a CRC annually, but rather appoint, as and when needed.

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4. The CRC shall investigate the complaint as it sees fit, including meeting with all relevant parties involved as deemed necessary, in order to come to a satisfactory resolution. Such meetings shall take place as soon as practical, ideally within 30 days. The relevant parties to the complaint may attend with one other person for support. Confidentiality of all parties involved must be respected.
5. The CRC shall write up its findings and its attempts to resolve the complaint together with any follow up recommendations, as appropriate.
6. The President, on consultation and agreement with the Board by simple majority, is authorized to take disciplinary action up to and including termination of membership.
7. The President shall arrange for the outcome to be distributed in writing as appropriate, to the relevant parties to the complaint.

Appeal

The Parties to a Complaint have the right to request an appeal to the decision, within 7 days, by submitting an Appeal Request in writing to the Secretary at secretary@iwcbda.com.

The Board (subject to any board members with either a conflict of interest, or who may have already been involved in dealing with the complaint, removing themselves from the discussion and vote) shall review the findings of the CRC.

The decision of the Board carrying out an Appeal Review is final.

Agree to Disagree – or request Termination.

In cases where it is determined that it is not possible to reach satisfactory agreement, the result may be finalized on the basis that the parties agree to disagree. In such cases, all parties shall agree to drop the complaint(s) with no further discussion on the matter, in order to move forward. If this is not satisfactory to all parties, a decision may be made that it is in the best interests of the well being of the Club to terminate the membership of one or more of the parties.

Suspension

The Board reserves the right to suspend a member for non payment of fees and charges, or while carrying out an investigation. Such suspension may include, inter alia, removing rights and privileges to meetings, events, activities, IWC website and/or social media platforms.

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Immediate Termination - Notwithstanding the foregoing, the Board reserves the right to terminate a membership immediately in circumstances where a member has threatened the Board or any member of the Club, or where a member has exhibited abusive or bullying behavior, carried out fraud, other illegal activity or otherwise acted in a manner that is inconsistent with the IWC, its objects, Constitution & Bylaws, or Standing Rules.

Bermuda's Personal Information Protection Act ("PIPA")³

The IWC is committed to ensuring the security and protection of the personal information held on its members and being compliant and consistent with its approach to Bermuda's privacy laws. To meet these legal requirements and its operational goals, the Club collects and holds personal information on its members. As a registered charity, the Club is also required to maintain financial records of day-to-day transactions received and expended for seven years after the financial year end. To meet these requirements, the Club will only retain key information on its members so as to identify the incoming source of funds, for seven years after the termination of membership. A detailed list of the data held by the Club and their respective retention periods can be found, in the Board section of these Standing Rules, under Webmaster or by contacting the Club's Privacy Officer (the Webmaster) directly. webmaster@iwcbda.com

Privacy Policy

The Club's stand-alone privacy policy can be found under Member Documents or by following the relevant link in the footer sections on the Club's website.

Consent

The IWC shall hold personal information on its members for the Club's sole use in meeting its goals and objectives as a social club and as required by law as a registered charity.

As the Club is run solely by volunteers and has in excess of 300 members, it is not possible to effectively police when members have not provided a specific consent to use their photograph in IWC newsletters or IWC social media. As such, if a member does not wish for their photo / image to be used in IWC communications, it is the obligation of the member to remove themselves from being photographed.

³ EXPLANATION - New sections incorporated to include obligations under PIPA and to make clear the location of the Club's standalone Privacy Policy. Consent language added to be in line with the Club's practice and as previously communicated to members.

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Personal Information Data Breach

If a member becomes aware of, or suspects, a personal information data breach, e.g. hacking, sharing of a membership list (whether intentional or otherwise), etc. that is likely to adversely affect the Club or its members, they should immediately contact the Club's Privacy Officer (the Webmaster).

For further information, members should contact the Club's Privacy Officer, (the Webmaster). webmaster@iwcbda.com

Social Media Policy

Social media and networking sites, such as, amongst others, Facebook, Instagram, YouTube, Twitter, Messenger, Whatsapp, emails, texts, etc.) (together referred to as "social media") are a useful way for keeping in touch and exchanging information with friends and club members.

When using social media, members should not forget that what they post may be seen across multiple networks and may be permanent. Members are asked to think twice before posting and must take full personal responsibility for anything that they post. Members must not display offensive images or make offensive comments, or in any way harass, intimidate, bully, victimize or discriminate against other members. See also **Anti-Bullying Policy**, above.

Failure to adhere to this policy may lead to disciplinary action up to and including immediate termination of membership.

Before posting, members must first think:

- Does this post add value to IWC members?
- Does this post respect the privacy, confidentiality and propriety of IWC?
- Does this post respect the privacy, confidentiality and propriety of other members?
- Does the post make sense?
- Could any member misinterpret what is meant or intended?
- Could the post make other members uncomfortable?
- Could the post be considered harassment, or distressful to others?
- Could the post be considered bullying?

Members should not post anything that:

- will or could bring the IWC into disrepute
- is or could be interpreted as demeaning
- divulges any confidential information about a member (including emails or tel numbers)
- divulges any information belonging to IWC that is not already public information or expand upon such information already available in the public domain.

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makes references to the IWC in their own personal posts (Note, in such cases, the post should be removed and/or it be made clear that the views expressed do not represent the official position of the IWC)

Other

- Members may not write a blog about, or on behalf of the IWC, unless it is first sanctioned and minuted as such by the Board. If however, they give a personal opinion as an experienced person in a particular field, they must state that this is solely their view and not necessarily the views of the IWC.
- Members must not use any IWC logo or other copyright material that infers official endorsement of any photograph, article, document or opinion.
- Any photographs of IWC members must not be used to harass or intimidate them, or bring the club into disrepute.

Administration

The Board shall assign members to administer IWC social media platforms. The Board through its Administrators are authorized in their sole discretion:

- to remove or delete any posts that they believe could be considered offensive to others,
- to remove or delete posts that they deem not to be in alliance with the Club's Social Media policy or General Guidelines (a summary of which can be found in Friends of IWC Facebook site under "Featured" or by scrolling down under "About" or in "Files")⁴,
- block users from continued use of the social media, and/or
- to request the persons commenting on Club sites to take their conversations offline.

The Board further reserves the right to send any comments to law enforcement authorities for investigation as deemed necessary or as may be required by law.

What to do if you think you are being bullied

Members should contact the Webmaster, or Administrator to ask that the relevant posts be removed; seek assistance by contacting a Board member for support and direction; and/or file a Complaint in accordance with the IWC's Complaint procedures (above).

Membership Dues

- IWC's fiscal year end is June 30th.

⁴ EXPLANATION – Updated to show where members can find the General Guidelines in Friends of IWC Facebook page

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- Membership fees are payable annually in advance by 30th June.

Membership Dues, (Effective October 1, 2022)

As approved by members at the Annual General Meeting, May 11, 2022

Existing Members

Annual membership fee: \$60.00/annum if paid by June 30th.
\$75.00 if paid after June 30th.

New Members to the Club

Brand new members to the Club shall pay \$60.00 when joining the Club. In cases where the new member is joining the Club after April 30th, the new member shall have their membership extended to the end of the following fiscal year.

Non-Payment of Fees or Charges

Any member who cancels a reservation for an IWC activity or event after the designated reservation deadline has passed, must pay all appropriate charges within 30 days. Failure to pay may result in suspension and/or termination of membership.

Vacancies on the Board or Committees

In accordance with the Bylaws, in each year, the President may appoint up to 3 replacements for any vacancies on the Board. In cases where such vacancies exceed 3, the Nominations Committee process as outlined in the Bylaws should be activated. If members of the Nominations Committee are no longer available to act, the President may identify, after consultation with the Board, members to fill any vacancies on the Nominations Committee. Members should be invited to submit suggestions of suitable replacements directly to the Nominations Committee email group prior to the Nominations Committee selecting their recommended replacement.

Amending Members' Rules

For Rules that apply to all members, unless otherwise stated:

I Non Material changes to Members' Rules

1. Non-material changes⁵ to Members' Rules shall be approved and adopted by a simple majority of the Board (which may be made by way of email).
2. Changes shall be communicated to members.
3. Changes to the updated Rules shall be taken to the next members' meeting for approval.

⁵ Material Changes - any amendments that have a significant impact on members' Club participation or on members' behavior.

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II New and Material Changes to Members' Rules

1. New Members' Rules or material changes to existing Rules shall be approved and adopted by a simple majority of the Board (which may be made by way of email).
2. Changes shall be communicated to members for comments and feedback (min. of 21 days).
3. If there is minimal to no feedback, then the changes shall be taken to the next members' meeting for approval.
4. If there are significant comments and feedback, then a special information session should be held, if required.
5. Following the feedback received, changes shall be communicated to members (min of 7 days).
6. Final changes shall be approved and adopted by a simple majority of the Board.
7. Changes to the updated Rules shall be taken to the next members' meeting for approval.

When drafting new or significant changes to Standing Rules it is recommended that interested members be consulted. This may include members from a current or previous Bylaws Working Group and previous Board members who have longstanding history and knowledge of the Club. This will help to gain an understanding of any possible issues that should be taken into consideration before changes are proposed. This may also help to alleviate the need for steps 4-6.

Board and Committee Rules

Rules (Policies, Procedures, Guidelines) that apply to the Board, Committees and/or Activity Coordinators

Board and Activity Coordinators

Non-Members

1. Non-Members may attend two Hospitality events or Social events per calendar year, either as a guest of a member or by invitation of the Board.
2. Non-Members may participate in Club functions at the discretion of the Board.

Record Keeping

Each Board member and Activity coordinator shall keep appropriate records to hand over to her successor.

Activities Liaisons to the Board

3. The President shall appoint specific Board members each year to act as the liaison (referred to as the activity's "Board Liaison") with the Activity Coordinators and provide support to the Activity Coordinators.
4. The President shall advise the Activity Coordinators who their Board Liaison is.
5. Board Liaisons shall update the President and fellow Board members on their represented activities at the Board meetings.
6. The Board liaison shall act as one of the "Administrators" to any social media groups. See also under Activity Coordinators below.

Activity Coordinators

7. Each Activity Coordinator shall nominate a deputy.
8. The Activity Coordinator or deputy for each Activity shall update information on the IWC website by advising the Webmaster of the changes required accordingly.
9. When an Activity must be cancelled or venue changed the Activity Coordinator or their designate must notify all participants
10. In the case where a Facebook Group (or other social media platform) is set up for the Committee or Activity – The group should be set up as "closed" or "secret" so that all activities on the group are restricted to existing group members only. In such cases, the Activity Coordinator, their deputy and the Board Liaison should be the "Administrators" for the group.

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New Activities

1. Anyone wishing to start up a new activity shall seek Board approval to be classed as an IWC Activity.
2. The following information should be submitted to the Board before consideration can be given to any proposed new activity in order to assist the Board in understanding if the activity will be sustainable going forward:
 1. A trial of 2 to 3 months is recommended before the proposed Activity shall be considered.
 2. Name of the Coordinator and Deputy of the activity once approval has been granted
 3. Number of members interested and engaged.
 4. How often and on what day and time is this activity proposed to take place?
 5. What are the revenues & costs to this activity?
 6. Does the activity conflict with any other existing activity?
 7. While being tested as a possibility, the Board will support and publicize the effort to the whole membership.
3. Once Board approval is given for a new Activity, a Board liaison shall be appointed who shall then update the Board on progress.

Procedures applicable to specific Board Positions

NOTE These are in addition to those as mandated in the Bylaws.

All Board Members

Payments for Club expenses

Wherever possible, Board members should avoid using their own personal credit or debit cards to pay for Club expenses unless pre-approved by the Board, or in urgent cases, by the President and the Treasurer. The IWC cannot be held responsible for any additional fees and charges that may be incurred.

Hospitality and Social Functions

Only Board members may make or cancel reservations for Hospitality events, Social functions, activities and meetings.

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Treasurer

1. Ensure that annual accounts, including a balance sheet and income statement, is prepared and published on the website in September of each year.
2. Ensure the Club holds sufficient cash in its accounts to fund at least one hospitality event and one social function.
3. Maintain reserves for unforeseen legal or administrative expenses as agreed with the Board.
4. Ensure Financial Statements, including balance sheet and income statement, are retained for at least 7 years as required under The Charities Act.
5. Ensure detailed financial records are maintained for at least 7 years. In accordance with The Charities Act – “Accounting Records shall include day to day entries of money received and expended by the charity, and the matters in respect of which the receipt and expenditure takes place, and the assets and liabilities of the charity”.

Secretary & Compliance

1. File with the Registrar within 30 days, completed Trustee Declaration Forms for each new officer, and provide them with an updated Directors and Officers Listing which includes full contact information.
2. File with the Registrar within 30 days, any changes to the Board members and/or their addresses.
3. File within 30 days to the Registrar – any changes of information that are included in the annual filings.
4. Coordinate with the Webmaster to ensure that the following documents are current and up to date on the Club’s website:
 - a. The Compliance Certificate – public
 - b. Constitution & Bylaws - public
 - c. The Standing Rules – available to members only
 - d. Schedule of Membership Dues – public
 - e. Financials – public
 - f. Privacy Policy – public – (link also found in footer section of website)
5. Coordinate with the Webmaster to ensure that the Board section of the Club’s network (currently on Go Daddy) is maintained after each Board meeting.

NOTE - In accordance with The Charities Act, registered charities with an annual gross income of less than \$50,000 is exempted from having a Compliance Officer that has received approved AML/ATF Training; establishing and implementing AML/ATF Controls; and retaining certain records for specified periods. Should annual income reach or exceed \$50,000/ annum additional financial and compliance requirements will kick in.

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Communications Chair

On a regular basis, and at least annually, the Communications Chair shall check that a summary of the Club's Social Media Policy and relevant General Guidance for Administrators is up to date and readily accessible by users, on the IWC Friends of Facebook site (under Featured or Files or by scrolling down under About), or such other social media platform that is being widely used by members.

Social Media Administrators

Shall review and ensure that items posted by members are in accordance with the Club's Social Media Policy / General Guidance for Administrators prior to approving posts.

Webmaster

PIPA Guidelines and Procedures

Background

In accordance with the requirements under Bermuda's Personal Information Protection Act ("PIPA"), the IWC is required to have a Privacy Policy and appoint a "Privacy Officer". See above in the Member's section of the Standing Rules. The Club's Privacy Policy can also be found as a link in both the "footer" section and in the Club Documents tab of the IWC Website.

The Webmaster is the Club's **Privacy Officer**. Any member may contact the Privacy Officer to ask what information is held by the Club on that member.

The Club may retain personal information on its members in order to meet its goals and objectives and as may be required by law. Once the Club no longer requires such information, it should be deleted.

In accordance with the Charities (Anti-Money Laundering, Anti-Terrorist Financing and Reporting) Regulations (S36), the Club is required to maintain records showing day-to-day transactions received and expended by the Charity for seven years after the financial year end. As incoming funds are from its members, in order to meet these obligations, the Club has taken the view that it will only retain key information on its members so as to identify the incoming source, for seven years after the termination of the membership.

The Board has reviewed each of the data fields held on each member in its database and categorized them as follows:

CATEGORY	RETENTION PERIOD
Key fields required to identify a member who made deposits into The Club’s account (“Money related data fields”)	Retain for 7 years after the member has ceased being a member;
Fields that are relevant for the first year of membership as a “New Islander”	Retain for 1 year after becoming a member;
Board member Related data fields	Remove once no longer a Board member. Relevant data copied to the Board’s archives and held for statistical purposes.
All remaining fields that are not deemed “Money related Data Fields”	Retain for 7 months after the member ceases to be a member
Member’s Name, Date Joined and Date membership expired	Removed and copied to the Board’s archives. Held for statistical purposes

Procedures

By February of each year, or within 4 months of the Club receiving the Compliance Certificate from the Registrar, **the Webmaster shall:**

A. Data Fields Review

- i) Compare the Club’s data fields within the Club’s database to the data fields listed in the schedule below to determine whether there have been any changes to the data fields collected by the Club.

Any changes to the list shall be communicated to the President, Immediate Past President and Membership Officer for review. These changes should then be added to this List of Data Fields, together with an applicable deletion schedule.

- ii) These Guidelines and Procedures should be updated with the revised Data Fields accordingly and submitted to the Board for approval.
- iii) Upon Approval, the Standing Rules on the Club’s Website to be updated.

B. Data Clean up

- iv) Delete any records where the applicant never paid their dues or otherwise did not become a member.
- v) Except for the Club's Permanent Members (of which there are about 20 Past Presidents); systematically review the entire membership database and identify those members whose membership expired in excess of 7 years, and:
 - i. Extract and copy Name, Registration Date and Membership Expiry Date and add to the Historical Archive; and
 - ii. Purge record from the membership database.
- vi) Review the remaining data elements and remove the relevant data from the fields, in accordance with the List of Data Fields and their corresponding Deletion Schedule.
- vii) Report completion of this exercise at the next Board Meeting in sufficient detail to ensure that all steps have been completed,

C. List of Data Fields and their Corresponding Deletion Schedule.

Data Field Name	Deletion Schedule	Rationale
First Name	7 Y after cease to be a member - AND Archive	
Last Name	7 Y after cease to be a member - AND Archive	
Email	7 Y after cease to be a member	
Secondary Email /Social Media Email	7 Y after cease to be a member	
Phone Number	7 Y after cease to be a member	
Other Names (nicknames) ('alias')	7 Y after cease to be a member	Keep - often used as the means to identify an incoming payment
WhatsApp Number	7 Y after cease to be a member	
Parish	7 Months after cease to be a member	Used to assign mentor, used by members to find others that live near them to get rides, etc.
Photo (member uploads if they want to)	7 Months after cease to be a member	
Emergency Contact Name	7 Months after cease to be a member	
Emergency Contant Number	7 Months after cease to be a member	
Year of Birth	7 Months after cease to be a member	Agreed to delete and just maintain Year of Birth for statistical record purposs only
Bermudian / Long Time Resident? Y/N	7 Months after cease to be a member	Archive for historical knowledge and information
Country from which the member moved	7 Months after cease to be a member	Archive for historical knowledge and information
How they were introduced to IWC	7 Months cease to be a member	Archive for historical knowledge and information
Who introduced them (Name)	1 Y after joining	
Activity Participation (multiple choice)	7 Months after cease to be a member	
Organize Activities (multiple choice)	7 Months after cease to be a member	

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Data Field Name	Deletion Schedule	Rationale
Bank Account Name (voluntarily provided)	7 Y after cease to be a member	
Newsletter mailer consent	7 Months after cease to be a member	
Agreement to BL, Constitution and SR	7 Y after cease to be a member	
Certification	7 Y after cease to be a member	
Membership Status	7 Y after cease to be a member	
Membership Dues Payment Amount	7 Y after cease to be a member	
Membership Dues Payment Date	7 Y after cease to be a member	
New Islander Status	7 Months after cease to be a member	
Mentor (Y/N)	7 Months after cease to be a member	
Employment Status	7 Months after cease to be a member	used to ID those for the Working gals group
Member Dues Expiration Date	7 Y after cease to be a member - AND Archive	Archive This field is also used if a member pays more than one year in advance.
Member Dues Payment Type	7 Y after cease to be a member	
Member Dues Payment Status	7 Y after cease to be a member	
End Date of being a New Islander	1 Y after joining	
Assigned Mentor	1 Y after joining	
IWC Board Email	Immediately after leaving Board	
IWC Board Biography	Immediately after leaving Board	Where appropriate, archive for the historical record.
Registration Date	7 Y after cease to be a member - AND Archive	Archive. (system auto generated since 2013 when this database created)
IWC Board Position	Immediately after leaving Board	Archive for the historical record.

Personal Information - Data Breach Procedure

Background and Definition

The following extract from: A Guide to PIPA, Bermuda issued by the Office of the Privacy Commissioner

What is a personal information breach?

A personal information breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal information. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just losing personal information.

Personal information breaches can include:

- access by an unauthorised third party;
- deliberate or accidental action (or inaction) by an organisation or an overseas third party;
- sending personal information to an incorrect recipient;
- computing devices containing personal information being lost or stolen;
- alteration of personal information without permission; and
- loss of availability of personal information.

A personal information breach can be broadly defined as;

a security incident that has affected the confidentiality, integrity, or availability of personal information. In short, there will be a personal information breach whenever any personal information is accidentally lost, destroyed, corrupted, or disclosed; if someone accesses the information or passes it on without proper authorisation; or if the information is made unavailable and this unavailability has an adverse effect on individuals.

When do we need to tell individuals about a breach?

If a breach is likely to adversely affect an individual, PIPA says you must inform the Commissioner and those concerned directly and without undue delay. In other words, this should take place as soon as possible.

2. Identification and Initial Reporting

If a member becomes aware of a suspected or actual breach (e.g., lost laptop, hacking, mistakenly emailed list, etc.):

- **Immediate Action:** Report the incident immediately to the Webmaster (who is the IWC's Privacy Officer)

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- **Initial Containment:** The Webmaster (together with the reporting member if applicable), shall take immediate action to stop the breach (e.g., change passwords, unplug affected computers, revoke access rights).
- **Determine if Bank information could have been compromised.** Immediately contact the Treasurer and President who shall contact the Bank to have accounts frozen if required,
- **Do Not Panic:** Gather facts, but do not destroy evidence.

3. Incident Assessment (ASAP, within 24 Hours)

The Webmaster shall investigate to determine:

- **Nature of the Breach:** What actually happened? (e.g., stolen, hacked, accidentally emailed or personal information otherwise shared).
- **Data Involved:** What type of data is involved? (e.g., names, DOB, credit card info, contact details).
- **Number of Individuals:** Who and how many members are affected?
- **Risk Assessment:** Is the breach likely to adversely affect one or more individuals? Is there a real risk of significant harm to individuals (identity theft, fraud, embarrassment, physical safety)?

4. Containment and Mitigation (Ongoing)

- **Isolate:** Isolate the compromised system to prevent further data loss.
- **Recover:** Attempt to recover the data (e.g., remote wipe of a device).
- **Secure:** Change all administrative passwords if the database was breached.
- **Mitigate:** If financial data was lost, contact bank/financial institutions immediately.
- **Notify:** Follow notification requirements per below

5. Notification Procedures

Follow and complete the most recent version of ***the Office of the Privacy Commissioner's Incident Reporting Checklist*** and **Breach of Security Notification Form**.

- Under PIPA, if a breach is likely to adversely affect an individual, we are required to advise the Privacy Commissioner and the relevant individuals without delay.
- **Notify Affected Members (if necessary):** Without undue delay via email, phone, or letter.
- **Notify the Privacy Commissioner (if necessary):** As soon as feasibly possible.

The notification must include:

- Nature of the breach,
- The data involved,
- Steps taken to mitigate any risk from the event itself or it happening again, and

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- Steps taken to advise on what members can do to protect themselves.
- **External Notification:** If necessary, notify the police (if theft is involved).

6. Documentation and Retention (Mandatory)

The Club must maintain a record of all breaches, whether or not they are reported to the Commissioner.

The record shall include:

1. Date of breach,
2. cause, data involved,
3. actions taken, and
4. rationale for not reporting (if it was deemed low risk).

And shall be reported by the Webmaster to the Board at the next Board meeting (and retained in the relevant PIPA folder in the IWC's Board files for at least 2 years.

7. Post-Breach Evaluation

- Review the causes of the breach.
- Update security measures (e.g., stronger encryption, improved access controls).
- Update this policy and conduct staff/volunteer training to prevent recurrence, if required.

All

Credit Card Usage and Procedures

1. **Authorization:** The Board may authorize the issuance of a credit card in the name of the Club for authorized expenses of the Club.
2. **Authorized Users:** The Credit Card(s) shall only be held by designated Board members as approved by the Board.
3. **Usage Limitations:** The card(s) shall be used solely for legitimate, pre-approved Club business expenses. Personal use of the card is strictly prohibited and constitutes grounds for immediate cancellation of the card and may lead to immediate suspension or termination of membership.
4. **Transaction Limits:** The Board shall set a maximum credit limit on the card. All transactions in excess of \$1,000.00 shall have prior approval of the Board.
5. **Payment:** The credit card account shall be paid in full prior to the payment due date and shall be set up to be automatically paid in full by standing order if available.

6. Documentation and Reconciliation:

- 1) All transactions must be supported by a valid receipt or appropriate supporting documents.
 - 2) Receipts must be submitted to the Treasurer within 21 days of the transaction, or such earlier dates as may be prescribed by the Board,
 - 3) A monthly statement reconciliation report must be reviewed by an officer other than the cardholder.
 - 4) Copies of the Credit Card statement shall be included in the monthly Treasury reports to the Board.
7. **Loss or Theft:** The cardholder must report any lost or stolen card to the financial institution and the Management Committee immediately.
8. **Monitoring & Control:** A Board member, other than the cardholder, shall review the activity on the card on a regular basis for any unusual activity.
9. **Cancellation and/or Change in Board members?** Cards must be immediately surrendered to the Treasurer or the President, or such other Board member as agreed by the Board at the end of their tenure on the Board.

[IWC Documents held at the Bermuda Government Archives](#)

Background

In 2023 – 2024, the Board identified it was holding on to a series of boxes of documents passed down from previous Board members and was fearful that these would get lost and wanted to preserve them as part of the Club's History. It approached a number of different organizations. The Bermuda Government Archives was willing and able to accept the documents and assisted The Club in converting many of these into digital files.

At the Bermuda Government Archives, we now have:

1. The Club's hardcopy newsletters from 1982 to 2008.

These documents have been scanned and are available in the Board's archive folders on the network.

2. Hardcopy membership directories - Booklets from 1983 to 2007.

Of these, the first 8 booklets (from 1983 to 1991) have not been scanned and are only available at the Bermuda Government Archives. Those from 1992 to 2007 have been scanned and are available in the Board's Archive folders on the network.

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[Procedure to view IWC Documents stored at Bermuda Government Archives or on the Board's Archive folders on the Network](#)

Any person who expresses an interest to view IWC documents stored in Bermuda Archives or the Board's Network Folders must complete the following steps:

1. Submit an email request to IWC Bermuda to president@iwcbda.com and/or secretary@iwcbda.com with the following details:
 - a. Are you a current or past member of IWC?
 - b. Your First and Last Name
 - c. Your contact telephone number and email address
 - d. Purpose of the request
 - e. Planned date of review
 - f. In the body of the email, include the following text: "By submitting this request, I acknowledge I will not copy, publicize or misuse personal information presented in IWC archived documentation."
2. If the approval to view the IWC Bermuda archive documents is granted, it will be valid for 20 business days. *The Board reserves the right to assign one of its Board members (or their designate) to accompany you in Bermuda Archives.*
3. Present the IWC Board approval to the staff at Bermuda Archives.

Note: IWC Bermuda does not presently charge a fee to access the archived documents.

[Amending Board & Board Committee Rules](#)

Unless otherwise stated, the Board shall consider Standing Rules and may change them from time to time by simple majority vote of the Board.

Document History

Version No	Comments	Author	Approved by
2.7	Version 2.7 – Amended Rules for Board and Board Committees only.	M Jett	Board - 3 Sept 2017
Draft 2.7.14	Introduced brand New Section for Members' Rules, separate from Rules that apply to Board and Committees. Document includes: Ethical standards, Confidentiality, Conflicts of Interest, Indemnification, Discrimination, Anti-Bullying Conflict Resolution, Complaints, PIPA, Social Media Policy, Non Payment of Fees, Procedures for Vacancies on Board when greater than 3; Rules for Amending the document.	B Vesey	Board – 6 Nov. 2019
3	Small amendments to Conflicts of Interest – Removing redundancy; Discrimination-Re-ordered and added political affiliation; Conflict Resolution-small addition; Vacancies on Board – Moved to Members' section of document. Working Draft 2.7.18 Approved. Published as Version 3.	B Vesey	Members – 11 December 2019
3.1	Added new section covering the Schedule for Membership Dues (previously located in Bylaws)	B. Vesey	Members at AGM – 11 May, 2022
3.2	In Board Section – Included new section covering guidelines and procedures for specific Board positions: Treasury, Secretary/Compliance. In Member Section – Removed references to the old schedule of dues. New schedule came into effect October 1 st , 2022, as approved by members at AGM held 11 May 2022	B. Vesey	Board – 7 Sept 2022
3.3	In Board section - Communications, Webmaster and Administrators to refer to Social Media Policy; new procedures for Webmaster re annual database clean-up re Privacy Policy; new procedures for IWC documents held at the Bermuda Government Archives.	B. Vesey	Board – 4 June 2025
3.4	In Board Section – Board members should not use their personal cards for Club expenses; small revisions to Secretary, Communications, New PIPA Data breach procedures, New IWC Credit Card procedures.	B Vesey	Board – 9 April 2026
3.5	In Member Section – Appointment of a CRC changed from annually to as needed. Social media to include location of Facebook Guidelines. PIPA to include where members can find retention information on members data, Consent language re images, and location of standalone Privacy Policy.	B. Vesey	