

Policy on the Use and Distribution of Member Information to Locals and Local Organizing Committees (LOCs)

Effective Date: April 24, 2026

1. Purpose

- 1.1. This **Policy on the Use and Distribution of Member Information to Locals and Local Organizing Committees (LOCs)** (the “**Policy**”) governs the use of Member Information and the use of digital tools provided by CAPE. The purpose of this Policy is to ensure that Member Information and digital tools are used in a responsible, secure, and privacy-conscious manner, consistent with CAPE’s organizational values and governing documents, including CAPE’s Constitution, By-laws, and [*Privacy Policy*](#).

2. Application

- 2.1. This Policy applies to all members of Local Executives and LOCs who access or handle Member Information through digital tools provided by CAPE, including Action Network, Action Builder, and CAPE-issued email accounts.

3. Definitions

- 3.1. In this Policy,
- a. “**Action Network**” a mass communication tool used by Local Executives to create and distribute emails, forms, polls, petitions, and related materials.
 - b. “**Action Builder**” is a digital organizing tool used by LOCs for worksite mapping, relational tracking, and campaign organizing.
 - c. “**Local Executive**” means the members of a CAPE Local, that have been duly elected or acclaimed to positions on the Local Executive Committee, or appointed as Stewards, in accordance with CAPE’s Constitution and By-laws, as well as the Local’s By-laws.
 - d. “**Local Organizing Committee**” or “**LOC**” means a group of members of a local that have been approved by the National Office to form a Local Organizing Committee in accordance with CAPE’s [*Policy on local organizing committees approved by the CAPE National Office*](#).
 - e. “**Member Information**” means information about individual or groups of CAPE members and may include name, membership status, email address, mailing address, online identifiers, messaging handles, phone number, work location, work department, classification group, and other contact or organizing-relevant information.

4. Permitted Uses of Member Information and Digital Tools

- 4.1. Member information and CAPE-issued digital tools may be used solely for the following purposes, where members have consented to the collection, use, and disclosure of their information for such purposes:
 - a. To communicate Local-related matters, including campaigns, updates, meetings, and events;
 - b. To support organizing and mobilization efforts that are consistent with CAPE's strategic objectives;
 - c. Administering and coordinating CAPE Local business; and
 - d. In accordance with CAPE's Constitution, By-laws, and Policies, including the [Privacy Policy](#).
- 4.2. It is the responsibility of Local Executives and LOCs intending to use CAPE-issued digital tools to verify with CAPE's Privacy Officer, as designated in the [Privacy Policy](#), that the required consent has been obtained from members prior to accessing, using, or disclosing Member Information.

5. Platform-Specific Permitted Uses

5.1. Action Network (used by Local Executives):

- a. Sending broadcast emails to members on Local matters
- b. Creating and distributing forms, surveys, petitions, and event invitations
- c. Tracking participation and engagement in Local campaigns

5.2. Action Builder (used by LOCs):

- a. Identifying and mapping members within a Local for organizing purposes
- b. Logging one-on-one conversations and member interactions
- c. Tagging or grouping members for targeted outreach
- d. Coordinating mobilization efforts in alignment with Local and national priorities
- e. All data entry, use, and access in both platforms must be limited to what is necessary to carry out these functions.

5.3. CAPE-Issued Email Accounts for Locals

- a. Used to login to various digital platforms for the purposes of communicating with members, local organizing, and tracking engagement
- b. Used solely for Local-related communications and administration
- c. Must not be used for personal, commercial, or non-union purposes

- d. Must not be shared with unauthorized individuals
- e. Remain the property of CAPE and may be subject to access review or audit by CAPE's Privacy Officer

6. Access and Authorization

- 6.1. All access to Member Information, digital platforms, and email accounts is granted and managed by CAPE's Privacy Officer.
- 6.2. Access shall only be granted to members of Local Executives and LOCs who have signed and submitted to the National Office a copy of the applicable Solemn Declaration:
 - a. [Solemn Declaration for Local Executives](#)
 - b. [Solemn Declaration for LOCs](#)
- 6.3. Only authorized individuals may access these tools.
- 6.4. Authorization may be revoked at any time, particularly upon change in role or violation of this Policy.
- 6.5. Authorized users must receive appropriate training on platform use and data handling.

7. Data Sensitivity and Security

- 7.1. Member information may only be accessed or used when necessary for union purposes and must be handled with care.
- 7.2. Member information must not be downloaded, copied, exported, or stored outside the platforms without express written authorization from the National Office.
- 7.3. CAPE Local email accounts must be protected with secure passwords and used exclusively for CAPE local purposes.
- 7.4. Multi-factor authentication (“**MFA**”) will be required to access some platforms using CAPE local email accounts. One individual from each Local shall be responsible for their Local's MFA.
- 7.5. All users must take reasonable steps to protect Member Information from loss, unauthorized access, or misuse.
- 7.6. Devices used to access platforms or email accounts must have appropriate security protections (e.g. password or biometric locks, up-to-date software).
- 7.7. Immediately inform CAPE National if you suspect that a CAPE local email account or any data contained therein has been compromised.

8. Prohibited Uses of Member Information

8.1. The following uses of Member Information are strictly prohibited:

- a. Using any Member Information or CAPE-issued tools for personal or commercial purposes;
- b. Sharing login credentials or providing access to unauthorized persons;
- c. Downloading or exporting member data without permission from CAPE's Privacy Officer;
- d. Using Member Information for purposes other than those stated in this Policy;
- e. Campaigning for or against an election candidate or otherwise supporting external or non-union campaigns using CAPE resources;
- f. Using CAPE Local email accounts for non-union communications; and
- g. Otherwise using Member Information for any purpose contrary to the best interests and welfare of CAPE.

9. Accountability

- 9.1. All communications to members of a Local must clearly identify at the start of each communication that they originate from the Local in order to avoid confusion with communications generated from CAPE's National Office.
- 9.2. The **Disclaimer** attached in **Appendix "A"** must be included in the signature line of all communications from CAPE local email addresses and anywhere that CAPE local email addresses are listed including on CAPE National or CAPE local web pages. Emails sent through Action Network should use the standard email wrapper provided by CAPE National, which includes the Disclaimer.
- 9.3. Members of Local Executives and LOCs with access to Member Information are responsible and will be held accountable for ensuring that they comply with this Policy.

Appendix “A”

Disclaimer

DISCLAIMER:

Please do not to send any private or confidential information to a CAPE local email address. Multiple individuals have access to CAPE local email accounts and CAPE cannot guarantee the confidentiality of any communications sent to or from these accounts. If you have questions or concerns about a labour relations issue, please contact your CAPE labour relations officer at representation@acep-cape.ca.