



The Alberta Fish & Game Association is your voice in conservation

November 1, 2022

Notice of DRAFT Proposed Change to AFGA Management of Membership Rosters

Dear Affiliated AFGA Clubs (Presidents and Membership Contacts) and AFGA Zones;

We have identified several concerns with the current Membership Roster process, including potential legal issues. In response, we have developed a new DRAFT process that deals with these issues. It is proposed to introduce these changes **effective January 1, 2023**.

Both aspects are addressed in the DRAFT document that follows. We are seeking your input, comments, and feedback.

Please respond to my email address, president@afga.org and I will answer your queries.

If needed, we are prepared to schedule ZOOM meetings to address your concerns.

Yours sincerely,

Victor Benz
President, Alberta Fish and Game Association

cc:

Kelly Carter Chief Executive Officer, Alberta Fish and Game Association
Alberta Fish and Game Association Executive

Affiliated Club Roster Collection and Management

The Alberta Fish and Game's (AFGA's) process and procedures around Affiliated Club roster collection and management are changing for 2023. There are two key drivers for this action.

1. Alberta's Personal Information Privacy Act (PIPA)

PIPA is intended to provide regulation on the collection, protection, use and disclosure of personal information by provincially regulated private sector organizations, businesses and, in some instances, non-profit organizations.

The Government of Alberta (GoA) website for PIPA helpfully provides a workbook to determine whether an organization is subject to PIPA.

<https://www.alberta.ca/personal-information-for-non-profits-and-other-organizations.aspx>

Today, I believe the AFGA is not subject to PIPA. That worksheet-based assessment is presented in Appendix 1. The determination rests heavily on whether the AFGA engages in Commercial Activity, such as offering training or selling products for fees like those charged by the for-profit sector, which we have done in the past.

Regardless of whether an organization falls under PIPA, all organizations are still strongly encouraged to "... *adopt best practices to protect the personal information of your clients and staff.*"

Since the AFGA, the AFGA Zones, and all AFGA Affiliated Clubs are separate, legal, sovereign entities, these best practice concepts apply to each entity, and specifically to any personal information transferred between them. Those best practices generally include:

- Unless consent is implicit, the individual's consent to gather the data is required. Completing an Affiliated Club Membership form is viewed as providing implicit consent to the Affiliated Club.
- Gather only the information that is required to provide the services promised by the organization.
- Obtain explicit consent to transfer personal information to another entity. Transfer only that personal information that is required to provide the services promised by the organization receiving the personal information.
- Keep the personal information only for as long as it is valid, usually the current membership year.
- Protect the gathered personal information.

2. Affiliated Club Roster Collection and Management Workload

The workload of managing the Affiliated Club roster collection today often requires the full-time attention of an AFGA staffer. As well:

- A great deal of time is wasted in trying to get to an agreed-to roster between the AFGA and the Affiliated Club.
- Most of the data collected by the AFGA is not required by the AFGA to provide its services to the Affiliated Club or its member
- There is often a time lag of several months between when the Affiliated Club roster is first submitted and the Affiliation Due invoice for that Affiliated Club roster is finally paid.

Affiliated Club Roster Collection and Management Proposal

1. Annual Affiliation Confirmation

The AFGA Affiliation Year is the calendar year.

The system presented in the current registered bylaws for the calculation of voting delegates for the Annual General Meeting (AGM) and Special General Meetings (SGMs), together with the issues of Affiliated Club roster collection is not workable. A practical work-around has been to use the previous calendar year's Affiliated Club headcount to determine the current calendar year's voting delegate allocation.

The problem with this approach is that an Affiliated Club's delegates could vote at the current year's AGM and SGMs and never actually affiliate with the AFGA for that year, as happened in the 2022 AGM.

To avoid a recurrence, an Annual Affiliation Confirmation must first be completed by each club. An example appears as Appendix 2.

2. Affiliated Club Membership Application Form

It is strongly recommended that all clubs carefully review their current Club Membership Application form and confirm that all fields are indeed necessary for the club to provide the expected services to the club member.

For its part, the AFGA requires the following information with each Affiliated Club roster submission to properly calculate Affiliation Dues and determine the Personal Liability Insurance Coverage cost paid by the AFGA:

- The number of Youth memberships in the roster submission,
- The number of Regular memberships in the roster submission,
- The number of Family memberships in the roster submission,
- The number of Family membership Dependant members 13 years of age and older in the roster submission, and
- The number of Family membership Dependant members 12 years of age and younger in the roster submission.

Should there be an insurance claim, the only question that is asked of the AFGA is whether the club in question was affiliated with the AFGA on the date of the potentially insured incident. The onus has always rested with the club to:

- Prove the claimant was a member of the club on the date of the potentially insured incident. This rests on the date on the completed Club Membership Application form.
- Prove that all of the club members have always been registered with the AFGA.

This has always been the process for resolution of an insurance claim.

The AFGA also requests the following personal information with each Affiliated Club roster submission for communicating with Affiliated Club members:

- An email address for each membership to provide AFGA updates and the Hook and Bulletin.
- A mailing address for each membership to provide the AFGA version of Outdoor Canada West.

Since the AFGA and the Affiliated Club are separate, legal, sovereign entities, the Affiliated Club needs explicit consent of the Club Membership applicant to provide their personal information to the AFGA. An opt-out checkbox on the Club Membership Application form, such as the one show below, is recommended.

Please do not share my personal information with the Alberta Fish and Game Association. I understand that by checking the box to the left, I will **NOT** receive the AFGA Hook and Bulletin, occasional AFGA update emails on topics important to Alberta outdoors, and the special AFGA subscription to Outdoor Canada West.

3. Affiliated Club Roster Submission to the AFGA

Each Club Roster Submission to the AFGA has five key components.

- The total number of new club members since the last submission, broken down into the categories required by the AFGA.
- The calculation of the Affiliation Dues owed by the club for the total number of new club members since the last submission.
- A cheque for the total amount of the Affiliation Dues owed by the club for the total number of new club members since the last submission
- The grand total of current club members since the last submission, broken down into the categories required by the AFGA.
- A listing of the emails and mailing addresses of those new members agreeing to share that personal information with the AFGA, as an Excel spreadsheet.

Those submission documents are presented as Appendix 3.



Worksheet 1

Is your organization subject to PIPA?

1. Is your organization
 - incorporated under Alberta's *Societies Act*,
 - incorporated under Alberta's *Agricultural Societies Act*, or
 - registered under Part 9 of Alberta's *Companies Act*?

YES. Go to question 2.

NO. Your organization is fully subject to PIPA. (Go to next page.)
2. Does your organization
 - Operate a private school (as defined by the *School Act*),
 - operate an early childhood services program (as defined by the *School Act*), or
 - operate a private college (as defined by the *Post-secondary Learning Act*)?

YES. Your organization is subject to PIPA for the collection, use and disclosure of personal information for that operation.

NO. Go to question 3.
3. Does your organization sell, barter or lease a membership list, donor list, or other fund-raising or client, volunteer or employee list?
- YES. Your organization is subject to PIPA for the collection, use and disclosure of personal information on that list.

NO. Go to question 4.
4. Does your organization engage in any other “commercial activity”? For example, are you operating a day care centre or a fitness centre, or offering training or selling products for fees like those charged by the for-profit sector?
- YES. Your organization is subject to PIPA for the collection, use and disclosure of the personal information connected to the commercial activity.

NO. Your organization is not subject to PIPA. Your organization may choose to adopt best practices to protect the personal information of your clients and staff.

Appendix 2 - Club Affiliation Declaration

AFGA Club Affiliation Annual Declaration - 2023

I, _____, with signing authority for the _____ (the Club), state that the Club wishes to affiliate with the Alberta Fish and Game Association (AFGA) for the 2023 Calendar year.

I affirm that the Club “subscribes to the objects of the Association and whose expressed aims are the renewal of our fish, wildlife, and natural resources and their conservation and management for the future” (registered AFGA Bylaw 2.1).

I also commit the Club to submitting the correct total number of all current members of the Club, regardless of whether they are also members of other Clubs, Direct Members or Life Members, with each roster submission to the AFGA for proper calculation of the required Affiliation Dues.

I understand that until this Declaration is completed, the Club will not be represented by Voting Delegates at any Annual General Meeting or Special General Meeting in 2023.

I understand and accept that failure to meet these requirements shall result in the Club’s affiliation request being denied or the Club’s affiliation status being rescinded.

On behalf of the Club

Club President

_____ (Print Name)
_____ (Signature)
_____ (Date)

Club Vice-President

_____ (Print Name)
_____ (Signature)
_____ (Date)

Club Membership Contact

_____ (Print Name)
_____ (Signature)
_____ (Date)

Received by the AFGA

_____ (Print Name)
_____ (Date)

Appendix 3 - Affiliated Club Roster Submission to the AFGA



2023 REMITTANCE FORM

The Alberta Fish and Game Association
 13045 156 Street NW, Edmonton, AB T5V 0A2
 Phone: 780-437-2342
 Email: membership@afga.org

Roster Submission Date (yyyy-mmdd) _____

Affiliated Club Name _____

Membership Contact: Name _____

Phone Number _____

email _____

	Previous Total Membership	Memberships Expired	Current Starting Total Membership	This Submission	Current Total Membership
Youth Memberships					
Regular Memberships					
Family Memberships					
Family Dependants 13 yrs. & older					
Family Dependants 12 yrs. & younger					
Total Members					

Affiliation Due Payment included based on this submission

_____	YOUTH Memberships	@ \$20.00	= \$	_____
_____	REGULAR Memberships	@ \$45.00	= \$	_____
_____	FAMILY Memberships	@ \$60.00	= \$	_____
TOTAL AMOUNT SUBMITTED			= \$	_____

	A	B	C	D	E	F	G	H	I	J
	Date of Expiry	First_Name	Last_Name	Email	Mailing_Address	City	Province	Country	Postal Code	Club
1										
2	2023-Dec-31	JOHN	LENNON	email@email.com	12307-111 Avenue NW	Edmonton	Alberta	Canada	T61 0P1	Affiliated Club X
3	2023-Dec-31	GERRY	PACEMAKER	email@email.com	12307-111 Avenue NW	Edmonton	Alberta	Canada	T61 0P1	Affiliated Club X
4	2023-Dec-31	FRED	PLAYBOY	email@email.com	12307-111 Avenue NW	Edmonton	Alberta	Canada	T61 0P1	Affiliated Club X
5	2023-Dec-31	GEORGE	HARRISON	email@email.com	12307-111 Avenue NW	Edmonton	Alberta	Canada	TG1 0P1	Affiliated Club X
6	2023-Dec-31									
7	2023-Dec-31									
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9	2023-Dec-31									
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