ADMINISTRATIVE PROCEDURES AND GUIDELINES

DIGITAL TOOLS, PLATFORMS AND SOFTWARE ASSETS

Version 1.0 | Prepared By Yolanda Butler | November 14, 2026 | Effective Date To Be Recorded

Purpose And Scope

GFMN keeps control of every digital tool, account and record it uses, so people can do their work safely and nothing is lost when someone leaves. One register lists every asset; every access change links to an approval; routine work runs under a recorded standing approval without repeated forms.

These guidelines apply to everyone who does GFMN work: directors, officers, employees, contractors, subcontractors, interns and volunteers. They cover all current and future digital tools, platforms, accounts, subscriptions, licenses, websites, domains, databases, AI services, integrations and related data or content, including free tools, vendor-managed accounts and work assets held in an individual's account.

Use with GFMN's Cybersecurity and Data Protection Controls Administrative Reference v1.0 (effective November 9, 2026), the Decision Matrix, and Resolution 6 (Spending Controls). An authorized administrator records the effective date before use.

Roles And Current Holders

The roles below administer this procedure. One person may hold more than one role. A vacant role is covered by the Executive Director until it's filled, and the Secretary updates this table when a holder changes.

Role	Current holder	What the role does here
Cybersecurity and Data Protection Officer (CDPO)	Yolanda Butler	Approves access, security and data sharing. Holds owner-of-record and recovery for every asset. Leads incident response. Carries out offboarding.
Executive Director (ED)	Max Graves	Assigns work, confirms asset owners, approves spending within authority, sets access start and end dates.
Secretary	Raeanne Makinen-Brown (Acting)	Maintains the register and the approval records. Checks gaps and completion.
Finance Officer	Maggiy Emery (Acting Treasurer)	Processes approved spending; tracks renewals and cancellation deadlines with the asset owner.
Communication Manager	Fellicia Smith	Day-to-day administration of the website, social accounts and communications files.
Asset owner	Per the register, by role	Accountable for the asset's use, upkeep, renewals and user list. Ownership doesn't by itself grant administrator access.

Contractors may gather information and prepare requests or drafts within their approved scope. They don't administer these guidelines, approve access, or hold privileges beyond those of the employees they work alongside.

When Approval Is Required

Approval is required for exactly five things. Everything else is routine work under the standing approval recorded in the register.

1. A new tool, account, subscription or integration.
2. A new user, or a user moving to a new asset.
3. A higher permission than the one recorded for that user.
4. New or increased cost, a renewal, or a cancellation.

5. Sharing data outside GFMN, or a change in what data an asset holds.

Who approves what:

Decision	Approver	Recorded by
Access, permissions, security settings, data sharing	CDPO	Secretary
Assignments, asset ownership, start and end dates	ED	Secretary
Spending, renewals, cancellations	ED under Resolution 6, with the Finance Officer	Secretary

One approver per request. A standing approval is written once, in the register, and names its purpose, recipient, access level and conditions. Work inside those conditions continues without a new request; a change to any of them is a new request.

Requesting Tools or Changing Access

Four steps, in writing, every time one of the five triggers applies.

1. Describe the need. Tool, purpose, users, minimum permission, data involved, duration, cost, and any existing approval it falls under.
2. Get the approval. Send the request to the one approver for that decision, or cite the standing approval by its register reference. Contractor access must fit the approved agreement and scope of work.
3. Set up the approved access. Individual logins only, at the minimum permission the work needs. Record the platform's actual permission label and MFA status in the register. A request doesn't grant access; the setup does.
4. Record and close. Link the approval and setup to the register entry, notify the requester, and refer any scope change back to the approver.

Everyday Security

Owner and recovery contacts stay under GFMN's control, on an organizational mailbox, never a personal address. Every account uses an individual login, a strong unique password kept in the approved vault, and multifactor authentication wherever the platform supports it. Keep software current.

Never share passwords, verification codes or recovery codes, by private message, by email, or through an organizational mailbox. Never enter them on any form or in the register; record a vault reference instead. Report a suspected security problem to the CDPO immediately.

Renewals And Financial Controls

The asset owner checks need, usage and cost at least 60 days before each renewal or cancellation deadline, and the Finance Officer keeps a 90-day lookahead of renewal dates, cancellation-notice deadlines and automatic charges from the register. Every renewal, cancellation or new charge follows the Decision Matrix, the adopted financial controls and the spending pause under Resolution 6, with the approval and the vendor's confirmation filed against the register entry.

Offboarding And Reassignment

Within one business day of a person's end date or role change, the CDPO completes the steps below, the ED having set the date in writing and the Secretary recording completion. The same steps apply when a contractor's engagement ends.

- ☐ Remove or change the person's access on every asset listed against them in the register
- ☐ End active sessions and revoke tokens, API keys and app passwords they held
- ☐ Transfer files, ownership and recovery contacts to the designated successor
- ☐ Change any password or key that may have been exposed, including shared ones
- ☐ Keep records required by retention rules or a legal hold
- ☐ Record completion and any remaining gaps in the register

Initial Review And Follow-Through

Within 30 days of the effective date, the Secretary and CDPO review every GFMN digital asset, including those held by employees, contractors, volunteers and vendors, and confirm ownership, permissions, MFA, renewals and costs with the authorized account holders. Gaps go in the register with a responsible role and a due date. Contractors may gather the information; designated administrators decide and carry out the next steps.

Addendum A: Digital Asset Register

Record one row per asset and use the same asset ID wherever the asset is mentioned. List every user and integration in the Users cell with the platform's exact permission label. Enter a vault reference, never a password, key or recovery code. Rate the account and its private records separately from the content the public sees. Update the row whenever access, ownership, cost or a renewal changes. The Secretary keeps the live register as a spreadsheet; the rows below set its layout and hold the first four entries, which the initial review confirms.

ID	Asset and URL	Owner (role)	Administered by (role)	Org mailbox	Users and exact permission	Approval ref and end date	MFA verified (date)	Recovery holder and vault ref	Account sensitivity	Content sensitivity	Renewal date and cost	Next action, owner, due
A001	EveryAction / Bonterra (account URL to verify)	ED	CDPO	verify	ED-delegated employee, Contributor (exact role to verify)	Pending; standing approval to be recorded	Unverified	CDPO; vault ref to confirm	Confidential	n/a	May 31, 2027; $11,025 paid for June 1, 2026 to May 31, 2027; nonrenewal notice due by April 1, 2027	Confirm recovery and access; CDPO; date to set
A002	End Slavery website, mnendslavery.org (Squarespace)	Communication Manager	CDPO	verify	Communication Manager, Editor (exact role to verify)	Pending	Unverified	CDPO; vault ref to confirm	Confidential	Public	verify date and cost	Confirm Site Owner, contributors, billing, domain registrar and MFA; CDPO; date to set
A003	Facebook, facebook.com/tciwoc	Communication Manager	CDPO	verify	Communication Manager, Contributor (exact role to verify)	Pending	Unverified	CDPO; vault ref to confirm	Confidential	Public	none	Confirm page ownership and admins; date to set
A004	Instagram, instagram.com/mniwoc	Communication Manager	CDPO	verify	Communication Manager, Contributor (exact role to verify)	Pending	Unverified	CDPO; vault ref to confirm	Confidential	Public	none	Confirm ownership and admins; date to set

Sensitivity choices: Public (approved for release), Internal (routine GFMN information for authorized workers), Confidential (personal, donor, personnel, financial or private operating records), Restricted (passwords, keys, recovery codes and anything needing tighter access), Unverified (not yet checked; never assume Public). Never enter passwords, keys or recovery codes in the register; record the vault reference only. The social account links were taken from the legacy MN IWOC page (mniwoc.com/no-slavery) on November 14, 2026; confirm current branding, ownership and any additional accounts during the initial review.

Addendum B: Responsibilities by Role

Use this table to find who does each activity, who answers for it, and who is kept informed. Each activity has one accountable role, and that role may also do the work.

Activity	Who does it	Who answers for it	Who is kept informed
Maintain and apply these guidelines	CDPO and Secretary	ED	Asset owners, Finance Officer
Request a tool or access	Requester, with the asset owner	Asset owner	Secretary
Approve access, security settings or data sharing	CDPO	CDPO	Requester, asset owner
Approve assignments, ownership and end dates	ED	ED	Secretary, CDPO
Approve and process spending	ED, then Finance Officer	ED	Secretary, CDPO
Set up approved access	CDPO	ED	Requester, Secretary
Keep the register and approval records	Secretary	ED	CDPO, Finance Officer
Review renewals and unused licenses	Asset owner, with Finance Officer	ED	Secretary, CDPO
Remove access and transfer assets	CDPO	ED	Secretary, Finance Officer
Lead security incident response	CDPO	CDPO	ED, Secretary, Finance Officer
Check gaps and completion	Secretary	ED	CDPO, Finance Officer

Preparing a request doesn't approve it. Share information only within the recipient's approved access.