Title: Communications Policy
Policy Type: Means
Policy No.: M-07

Effective Date: October 27, 2016          Review Date: October 2018

PURPOSE:

The purpose of this policy is to ensure that London Public Library (LPL) external communications are accessible, engaging and professional. It is also to ensure that LPL external communications are well-managed.

This policy supports the Library’s communications so that:

- LPL’s communications are consistent with the Library’s Purpose Statement and core values;
- LPL provides useful, accurate and understandable information;
- Communication strategies and requirements are an essential part of the Library’s community consultation and collaboration;
- Library Board Members, Employees and Volunteers understand how to meet the legislative requirements that govern communications and content, including the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), and other legislation and related Library policies; and
- Library Board Members, Employees and Volunteers understand what is expected of them when using Library communications channels.

SCOPE:

This policy refers to:

- External communications about or on behalf of London Public Library.
- Communication by LPL Board Members, Employees and Volunteers; and
- All forms of communications, including all online forms of communication, such as social media.

This policy is supported by Library guidelines such as: Guideline for Communication Regarding Personnel Matters and Guideline for Social Media Communications.
Title: Communications Policy  
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DEFINITIONS:  

**Communications** means the interaction between two or more people or groups where information and other content is provided, sent or received.  

**Communications Channel** means a physical transmission medium, such as print or electronic media, through which information and other content is sent or received.  

**Communications Platform** means a tool that supports back-and-forth communication such as conversations rather than just one-way or broadcast communication.  

**Confidential** means access is permitted only by those who have been authorized.  

**Employee** means a person who is employed by the Library and includes all Employees, including Page and Casual staff.  

**Non-partisan** is defined as not favoring or promoting any political party, platform or candidate.  

**Personal Information** is defined as information which can be used to identify an individual.  

**Record** means recorded information in any format.  
These formats can include documents, business records, financial statements, personnel files, minutes, accounts, letters, emails and other forms of correspondence, memoranda, photographs, films.  

**Transparency** means a situation in which business and financial activities are done in an open way without secrets, so that people can trust that they are fair and honest.  

**Volunteer** means a person who voluntarily extends his or her services to actively support the Library, and who does so without remuneration.
While Library Board Members volunteer their time and do not receive remuneration, for the purposes of this policy they will be referred to as Board Members as they have roles and responsibilities that are different from those of other volunteers.

POLICY STATEMENT:

London Public Library values the role that communications plays in:

- Engaging and consulting with the community and members of the public;
- Sharing information about the Library;
- Celebrating our value to the community; and
- Providing transparency about how the Library operates.

The Library will:

- Communicate in a respectful and positive manner, reflecting the Library’s values and its commitment to responsive public service;
- Support intellectual freedom while protecting privacy rights;
- Ensure that communication materials represent the diverse nature of the community in a fair and inclusive manner;
- Make sure that communications reflect the value of accessibility and comply with accessibility legislation and standards;
- Provide information in different formats so that a variety of a person’s needs can be met for library services;
- Use different ways and tools to communicate;
- Communicate possible danger, hazard or threat, to public health and safety as needed;
- Ensure that the Library Board and all Library Employees work together to achieve clear and effective communications with the public; and
• Manage communications effectively, efficiently and in a financially responsible manner.

Corporate Identity

LPL will maintain a clear and consistent corporate identity to help the public recognize and understand Library policies and use library programs and services.

Official Spokespersons

LPL's Communications Department has the responsibility for looking after the Library's communications protocols, channels and tools.

The Chair of the London Public Library Board and/or the CEO & Chief Librarian (CEO), or designate, will be the spokesperson when statements on behalf of London Public Library are required. This could include communicating Board decisions or corporate information about LPL. Corporate matters include how the Library is governed and financial matters. These spokespersons may assign other representatives to speak on certain topics as appropriate.

Employees will communicate openly and on a regular basis with members of the public about policies, programs, services and initiatives with which they are familiar and for which they have responsibility.

Employees will not speak on behalf of LPL and/or the Board about corporate matters unless they have been asked to do so by the CEO or the Manager, Communications. Corporate matters include how the Library is governed and legal, financial and personnel matters. Employees will inform the CEO or Manager, Communications if they are asked by the media for information about corporate matters or to comment on corporate matters.

Volunteers will not speak on behalf of LPL and/or the Board about corporate or operational matters. Volunteers will inform the Administrator, Volunteer Services if they are asked for information or to comment on corporate or operational matters.
LONDON PUBLIC LIBRARY
POLICY

Title: Communications Policy
Policy Type: Means
Policy No.: M-07

Effective Date: October 27, 2016        Review Date: October 2018

Library-Owned Intellectual Content

All intellectual content created by the Library and its Board and Employees acting on behalf of the Library is owned by the Library and the Library is the copyright holder. This includes information about the Library and its services, programs and initiatives. It includes content in all formats and content posted on LPL online and social media channels. LPL content may be reproduced by others with appropriate acknowledgement and used in accordance with Canadian copyright law. Questions regarding use and acknowledgement of content will be handled by the office of the CEO.

Accessibility

LPL works to provide “universal access” to library services for all people to the greatest extent possible. Where possible, the Library will provide access without the need for adaptation or specialized design in order to integrate services to persons with disabilities.

In accordance with LPL’s values and its Accessibility for Users with Disabilities Policy, the Library will:

- Communicate in ways that are accessible to persons with disabilities;
- Comply with the requirements of the Accessibility for Ontarians with Disabilities Act (AODA) and regulations; and
- Be consistent with the City of London Accessible Customer Service Policy.

LPL will:

- Provide accessible formats and communications supports as quickly as possible when a person with a disability requests them;
title: Communications Policy
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- Ensure that feedback processes, such as the Library Board delegations and public participation, are accessible. Communications supports and accessible formats will be arranged upon request;
- Make its website and web content accessible according to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 per AODA web content accessibility requirements; and
- Provide emergency procedures, plans or public safety information in an accessible format or with appropriate communication supports, as soon as is possible, upon request.

Access to Information and Protection of Privacy

Access to and communication of information held by the Library is governed by legislation and the LPL Access to Information and Protection of Privacy Policy.

It is the policy of the London Public Library that the Library will make information about the Library available to the public.

The Library will protect the privacy of all individuals’ personal information in its custody or control and will comply with the access and privacy provisions of the MFIPPA and other applicable legislation.

Spokespersons, as described above, will respect privacy rights at all times.

Inappropriate Content

Inappropriate content, as determined by the Library, will not be communicated or shared using the Library’s communications channels, platforms or equipment.

Examples of inappropriate content are: information that identifies individuals without their permission, copyrighted material, negative comments about the Library or its Board Members, Employees or Volunteers, hate propaganda, discriminatory or profane language, harassing language and behaviours.
Non-Partisan Content

One of LPL’s core values is to be open and welcoming to all. We strive to be non-partisan in our services, spaces and communications. To accomplish this London Public Library will be non-partisan in its communications and will not:

- Support, endorse, or advocate the viewpoints or beliefs of any one candidate, political party, organization or group;
- Allow the posting or distribution of election or campaign material in or around library facilities or on the website; or
- Participate in, or lend support to, partisan events organized for political party purposes.

Communication Regarding Personnel Matters

The Library Board or individual Board Members may receive communications which contain information about Library Employees or Volunteers. This information may meet the definition of personal information. LPL has a Guideline for Communication Regarding Personnel Matters in place to be followed in such cases.

Employees and Volunteers who receive communications which contain information about Library Employees that would meet the definition of personal information will refer the communications to the CEO and/or Manager, Human Resources.

Crisis and Emergency Communication

In the event of a crisis or emergency in which the Library is involved, LPL will communicate during and after the event using available means in a timely and
appropriate manner based on the response priorities for the crisis/emergency situation. The intent of this communication is to prevent injury or loss of life, limit damage to Library assets and property, maintain public services, assist in the process of recovery, and maintain or restore public confidence in the Library.

The Chair of the London Public Library Board and/or the CEO & Chief Librarian, and/or the Manager, Communications, assumes the role of spokesperson for crisis or emergency communications. Communications regarding the stewardship or reputation of the Library will also be the responsibility of those persons.

The Library will support the City of London and its boards and commissions in any crisis or emergency communications, as required.

**Media Relations**

LPL will operate and respond effectively in a 24-hour media environment. The CEO and Manager, Communications will proactively reach and inform the media about issues of importance to decision-makers and the public. LPL will engage the media using a variety of communication tools, including social media, news conferences, background or technical briefings, news releases, etc.

LPL will respond to information or interview requests from the media. Media enquiries will be answered promptly, whenever possible, to meet publication deadlines.

Employees may be designated by the CEO and/or Manager, Communications, to speak to the media about services and initiatives they are familiar with and for which they have responsibility. Such communication will be done in collaboration with the CEO and/or Manager, Communications.

**Advertising**

LPL will advertise its programs, services and initiatives in non-library communications channels and publications.
LONDON PUBLIC LIBRARY
POLICY

Title: Communications Policy
Policy Type: Means
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Review Date: October 2018

LPL may, at its own discretion, publish advertisements in its print publications from a public sector, non-profit, private-sector or non-government source.

LPL will not sell or provide advertising space or time, on the LPL web site or social media to any person, other organization or entity outside of the Library.

Communications Management

Gathering and providing information of importance to the public and other Library stakeholders requires professional tools and resources, and effective, accountable management. The CEO and the Manager, Communications are accountable for communications management.

Internal and external communication requirements will be identified and met when planning, managing or reviewing policies, programs, services or initiatives.

Responsible use of public funds to obtain maximum value for taxpayer investments is a requirement in all communication activities.

Technological Innovation and New Media

LPL will implement strategies to ensure that technology and new media advance the Library’s ability to connect with the public in efficient and practical ways. The Manager Communications and Director, Information Technology shall be accountable for the integration of communications with technology and new media.

Partnerships and Collaborative Arrangements

Communication requirements will be taken into account when planning, negotiating or implementing a partnership or other collaborative arrangement.
Joint activities or initiatives will be communicated in a manner that is fair and equitable to all parties.

Agreements governing collaborative arrangements will establish the communication roles and responsibilities of the parties involved.

*Environmental Stewardship*

LPL will be environmentally responsible by conserving energy and using energy and other resources, e.g. paper efficiently in the management and delivery of Library communications and the marketing of Library services and initiatives, where possible and feasible.

*Risk Management*

Communication, in person, in print and online will be clear, consistent and positive. LPL's corporate values, image, assets, and interests shall be protected and used to maximum effect.

Online and social media channels are dynamic and interactive. They have both opportunities and risks. Online messages have the potential to harm the image and brand of the London Public Library. To ensure positive and proactive communications and to prevent incidents or problems that may occur when communicating online, this policy, along with the *Charter of Library Use* and its associated policies, govern communications by members of the public using the Library’s communications channels, platforms or equipment. LPL will also have in place guidelines and training for Board Members and Employees.

The Library does not accept any responsibility for any content that appears on its online and social media channels that was not created by the London Public Library Board or its Employees.
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Accountability

The CEO & Chief Librarian is responsible for ensuring that:

- Communications priorities and requirements are met;
- London Public Library is compliant with legislation governing communications;
- Communications reflect Library values, policies, and priorities; and that
- Institutional communications are fully integrated into business planning.

LPL’s Manager, Communications is accountable to the CEO for managing the communications function, meeting all communications priorities and requirements and adhering to policy directives and guidelines.

BACKGROUND:

INQUIRIES:

Board Chair
CEO & Chief Librarian
Manager, Communications
Manager, Human Resources

KEYWORDS:

access to information, accessibility, communications, crisis communication, media, media relations, privacy, spokesperson
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RELATED DOCUMENTS:
Canadian Charter of Rights and Freedoms
Copyright Act and Regulations and other legislation governing intellectual content
Criminal Code of Canada
Accessibility For Ontarians With Disabilities Act (2005) and Ontario Regulation 191/11(Including Part II Communications Standards)
Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) and its regulations
Canadian Anti-Spam Law (CASL)
Public Libraries Act, R.S.O. 1990
Canadian Library Association Statement on Intellectual Freedom
Ontario Library Association Statement on Intellectual Rights
Board-CEO Linkage Policy (G-02)
Accessibility for Users with Disabilities (M-04)
Access to Information and Protection of Privacy Policy (M-05)
Delegations and Public Participation (M-100)
Intellectual Freedom Policy (M-01)
Race Relations Policy (M-03)
Records Management Policy (IP-A-01)
Library Board Communication Guidelines Regarding Personnel Matters (M-07-GU)

DOCUMENT CONTROL:
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