



**National Gallery
of Canada**

**Musée des beaux-arts
du Canada**

COMMUNICATIONS POLICY

This Policy was approved by the Board of Trustees on March 9, 2021.

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1. INTRODUCTION

Effective communications are critical to the fulfilment of the mandate set out for the National Gallery of Canada (the Gallery) by the *Museums Act*, which is: *to develop, maintain and make known, throughout Canada and internationally, a collection of works of art, both historic and contemporary, with special but not exclusive reference to Canada, and to further knowledge, understanding and enjoyment of art in general among all Canadians.*

The National Gallery of Canada is not subject to the provisions of the Communications Policy of the Government of Canada; nevertheless, the Gallery supports the policy's purpose and applies the policy principles to its own communications management.

2. PURPOSE

The purpose of this Policy is to ensure the Gallery internal and external communications are well coordinated, factually accurate, effectively managed and responsive to the diverse information needs of internal stakeholders and the public.

3. APPLICATION

This Policy applies to Board of Trustees (Board), all employees, interns, fellows, and volunteers. Primary accountability for this Policy rests with the Director and CEO. The responsibility for implementation of this Policy, and for ensuring that Gallery's communications comply with it, rests with the Vice President Corporate/Public Affairs and Marketing (Vice President), under the direction of the Gallery's Director and CEO.

4. POLICY STATEMENT

Through its communications and using all means possible, the Gallery will aim to share the experience of art to as wide an audience as possible with the intention of raising its profile and visibility, maximizing attendance and enhancing visitors' knowledge and experience of art.

All communications, both external and internal, will be consistent with and support the Gallery's commitment to reconciliation with First Nations, Inuit and Métis people, and principles of justice, equity, diversity, accessibility and inclusion.

It is the policy of the National Gallery of Canada to:

4.1 Adhere to the principles of openness, integrity and objectivity in all of its communications by being transparent and responsive to the people of Canada and by providing the public with timely, accurate, clear, objective and complete information about its policies, programs, services and initiatives. This includes treating everyone with respect and fairness, in an inclusive manner, including First Nations, Inuit and Métis people.

4.2 Communicate in English and in French pursuant to the *Official Languages Act*, which recognizes the equal status of English and French as the two official languages of Canada. The

Gallery will also use representative languages, where possible, including Indigenous languages to connect and enhance the narrative of its mandate.

4.3 Not tolerate communications that can be construed as abusive, bullying, harassing, racist, discriminatory, threatening, whether in the workplace or through personal communications channels, including social media. Obscenity will not be tolerated in Gallery communications.

4.4 Depict the diverse nature of Canadian society in a fair, equitable, representative and inclusive manner in all Gallery communications and marketing material, including those delivered by electronic means.

4.5 Strive to be inclusive of race, ethnicity, sex, age, disability, sexual orientation and gender expression, and be committed to learning, recognizing, acknowledging and addressing implicit bias, and have processes in place to ensure that efforts related to diversity and inclusion do not lead to tokenism or stereotype.

4.6 Ensure that all communication is clear and easy to understand. The Gallery must apply plain-language principles to all communications and will commit to equipping its representatives with knowledge and tools, and act to ensure that the language used in Gallery communications and marketing is anti-racist and supports efforts to meaningfully address systemic barriers. This means continuously learning, understanding and improving with an open mind to change.

4.7 Be visible, accessible, transparent and accountable to the public it serves by identifying itself in a distinct and consistent way and maintaining a recognizable and unified corporate identity in all circumstances.

4.8 Employ a variety of ways and means to communicate – from traditional methods to new technologies – to be accessible and communicate with Canadians wherever they may reside. The Gallery will always explore and evaluate appropriate new communication avenues available to the organization.

4.9 Identify and address internal and external communication needs and issues routinely in the development, implementation and evaluation of policies, programs, services and initiatives.

4.10 Consult and encourage the public where applicable, listen to and take account of people's interests and concerns when establishing priorities, developing policies, and planning programs and services. This two-way dialogue must be continuous, open, inclusive and relevant.

4.11 Deliver prompt, courteous and responsive communications that are sensitive to the needs and concerns of the public and respectful of individual rights while depicting the diverse nature of Canadian society in a fair, representative and inclusive manner. The Gallery representatives are honest about what they know and do not know, and will seek opportunities to learn.

4.12 Comply with related government policies and ethical guidelines, particularly: the *Museums Act*, the *Official Languages Act*, the *Access to Information Act*, the *Privacy Act*, the *Copyright Act*, and, when applicable, the Federal Identity Program, and maintain consistency with the Communications Policy of the Government of Canada, and Canada's anti-spam legislation together with Treasury Board guidelines in various areas of communications management.

4.13 React responsibly to requests for information while respecting the provisions of the *Access to Information Act* and the *Privacy Act*.

4.14 Take an assertive and measured approach to communications, particularly with respect to media relations, social media conversations, and in the promotion of programs and services.

5. ROLES AND RESPONSIBILITIES

The communications function is a shared role that requires cooperation and coordination of many internal stakeholders whose communications-related responsibilities are as follows:

5.1 The Board of Trustees, in its governance and stewardship role, is responsible for the Gallery's strategic policy and planning frameworks and approves:

- a) Gallery's Corporate Plans and the Annual Reports; and
- b) The Gallery's corporate policies, including the Communications Policy.

While this Policy does not apply to the National Gallery of Canada Foundation, the Gallery's Board of Trustees, as a signatory to the Memorandum of Understanding (MOU) between the Gallery and the Foundation, will ensure that the MOU includes a clause requiring the Foundation's communications to be consistent with the Gallery messaging and brand (or visual identity) and overall spirit of this Policy.

5.2 The Gallery's Director and CEO is accountable to the Board for the management of the corporation and the establishment of the Gallery's policies. In this role, the Director and CEO oversees the work of the Gallery's Senior Management Committee - and provides leadership in establishing the Gallery's overall communications themes, most importantly in designating the Vice President to coordinate the implementation of the Communications Policy.

The Director and CEO will ensure that the Communications Policy and its principles are fully integrated into the planning, management and evaluation of policies, programs, services and initiatives.

5.3 The Senior Management Committee defines communications objectives and priorities and ensures the appropriate distribution of resources to all programs and functions related to communications planning and management.

5.4 Reporting to the Director and CEO, the Vice President, is responsible for the oversight of communications and the implementation of the Gallery's Communications Policy. The Vice President, through the communications staff, works closely with all departments and, where applicable, the Foundation, in carrying out the communications function.

In this role, the Vice President will:

- a) direct the deployment of all internal and external communications, marketing, social media strategies and public relations that support all programs and services;
- b) provide oversight to ensure consistent compliance with the Gallery's Communications Policy across all of the Gallery's operations;
- c) work with other executives and managers to align their communications priorities, objectives and requirements for program and service delivery;

- d) ensure liaison and co-operation with the Strategic Communications Branch of Canadian Heritage for all communications-related matters, and with colleagues in a communications function in other departments and Crown corporations when appropriate;
- e) ensure a proper balance of professional resources among the principal elements of the communications function: internal and external communications; digital communications; social media strategy; media relations and public relations; advertising; sponsorship; and stakeholder relations;
- f) review and approve communications strategies; and
- g) assess all new initiatives within the public environment, and ensure that communications are fully considered in each new plan.

5.5 Curators and Chiefs are responsible and accountable for their programs and will actively participate in planning and executing the Communications Policy by:

- h) identifying the audience, assessing its concerns and information or service needs;
- i) working collaboratively with internal communications colleagues to serve the public, their audience and the media;
- j) reporting on issues or potential issues and opportunities within their areas of expertise, and working with the Vice President to prepare communications messages; and
- k) briefing staff on corporate plans, initiatives and priorities, and reporting on internal communications gaps to senior management.

Curators will ensure that issues, relating to the provenance of artworks in the Gallery collection and those under the consideration, are communicated to the Vice President and relevant external stakeholders.

Should questions or uncertainty arise, Curators and Chiefs will seek guidance from their Deputy Director/Director, and Vice President to ensure that the communications elements of their work are aligned with the requirements articulated in this Policy and with the key messages set forth in the Corporate Plan, and the Gallery's overall communications approach.

5.6 Gallery employees are responsible for promoting the Gallery's key messages and for bringing any communications issues to the attention of management. When communications questions arise, they will seek their supervisor's guidance to address them.

6. POLICY IMPLEMENTATION

Implementation guidelines set out in this Policy apply to the full range of internal and external communications issued by the Gallery regardless of the communications medium or form (i.e., social media, radio, TV, publications, printed or digital material). This includes communications related to affairs at its main location in Ottawa, and where applicable, at its partnering institutions and travelling exhibition venues, whether in Canada or abroad.

Through the efforts of all Gallery departments, the Gallery's visibility and profile are promoted. The following sections describe the implementation of this Policy in a wide range of internal and external communications, public relations and marketing activities that the Gallery undertakes.

6.1 Branding

The Gallery's reputation, or brand, is mainly determined by the quality of the services and experiences it delivers to its audiences. The Gallery's iconic logo* and visual identity wordmark** are key elements of that brand.

The application of the Gallery's visual identity wordmark is detailed in the Gallery's Brand Guidelines available through the office of Vice President. The Gallery's logo and /or visual identity wordmark must be applied to all communication products, including social media posts, advertising, exhibition marketing, printed, audiovisual and digital material (e.g. Gallery's web pages, e-bulletins, apps, social media sites, e-commerce, et cetera).

Exceptions to the use of the Gallery visual identity standards must be approved by the Vice President.

When applicable, the Gallery will comply with the Federal Identity Program and will display the Canada wordmark* on all publicly released communications products.

6.2 Advertising and Marketing

The Gallery will deploy advertising and marketing campaigns, domestically and abroad in support of its mandate and business objectives and priorities.

Before execution, all major advertising campaigns must demonstrate that they will be cost-effective and help achieve well-defined and measurable objectives. Market research, focus groups or similar mechanisms will be used to test the effectiveness of such campaigns. Once implemented, all major campaigns will be monitored and, upon completion, formally evaluated for their effectiveness.

Consistent with the *Official Languages Act*, media buys across Canada will include the purchase of advertising to serve official language minority communities.

All advertising will be consistent with the Gallery's corporate brand for which the Marketing, Communications and New Media department is responsible. In the interest of sustaining a consistent corporate image, no advertising material will be released until approved by the Vice President or the Director and CEO.

The principles of the Communication Policy will adhere to all communications including joint communications that may be required from time to time on national and international basis with other organizations.

6.3 Digital Platform

The Gallery's website and social media channels are the primary platform through which the institution provides information to the public, promotes visits and offers rich content and educational experiences. The website's digital art offerings connect virtual visitors with art and serve as an alternative for those who are unable to visit the Gallery.

The Gallery's digital communication activities will extend to content creation, a social media strategy, e-commerce, e-marketing and the digitization of the collection. As part of its digital strategy, the Gallery will monitor rapidly evolving technologies and identify opportunities and priorities in this area.

In the event of a disagreement with third parties, the Gallery's Communications Policy will determine its approach in communications.

Employee participation on social media channels will be encouraged to promote events and activities at the Gallery. In doing so, employees must comply with the Gallery's Code of Conduct, Social Media Guidelines, Communications Policy and be mindful not to disclose confidential or proprietary information, infringe copyright requirements or breach privacy.

6.4 Copyright

The use of images in print and digital communications products, and their distribution to targeted audiences, will comply with the *Copyright Act*. The Gallery will ensure that the ownership rights associated with works subject to copyright are fully respected in the Gallery's communications channels and products.

6.5 Media Relations

The Gallery uses its Media Relations network to broadly communicate its programs, services and activities. As a publicly accountable institution, the Gallery will proactively engage with the media in English and French on all subjects, issues and questions relevant to its mandate, so long as doing so does not contravene commercial, legislative or privacy obligations.

The Chair of the Board of Trustees and the Director and CEO are the Gallery's authorized spokespersons. Subject to the approval of the Director and CEO, the Vice President or other designated subject matter experts, may be called upon to serve as the authorized spokesperson.

6.6 Disclosure of Information

In keeping with Government of Canada directives applicable to Crown corporations, the Gallery recognizes the public's right of access to the information contained in government-controlled records as an essential element of Canadian democracy.

By making every reasonable effort, the Gallery will proactively disclose applicable records on its website. It will also grant the public access to records in accordance with the *Access to Information Act* and the *Privacy Act*.

6.7 Internal Communications

The Gallery will design and implement effective internal communication processes that will enhance its productivity and effectiveness by applying two key principles:

- a) Ongoing two-way communication whereby management and staff are regularly given opportunities to review and discuss corporate information and contribute to the achievement of corporate objectives, enhancement of projects and improvement of operations.

- b) Face-to-face communication as a preferred method whereby the managers/supervisors communicate to their direct reports the strategic and operational direction, relevant corporate issues and projects.

6.8 Crisis and Emergency Communications

Communications procedures in emergency and crisis situations are outlined in the Gallery's Crisis Communications Plan, which forms part of the *Business Continuity Plan*, available through the office of the Chief, Protection Services.

7. INQUIRIES

Questions concerning the interpretation of this Policy will be addressed by the Vice President, Corporate/Public Affairs and Marketing

REFERENCES

Access to Information Act (1985)
Communications Policy of the Government of Canada (2012)
Copyright Act (1985)
Federal Identity Program Policy (1990)
Financial Administration Act (1985)
Museums Act (1995)
National Gallery of Canada Graphic Guidelines
Official Languages Act (1985)
Privacy Act (1985)
National Gallery of Canada Social Media Guidelines (2012)