



**National Gallery
of Canada**

**Musée des beaux-arts
du Canada**

SECURITY POLICY

This Policy was approved by the Board of Trustees on 8 December 2020

TABLE OF CONTENTS

- 1. INTRODUCTION..... 1
- 2. CONTEXT..... 1
 - 2.1 PROTECTION OF PEOPLE 1
 - 2.2 PROTECTION OF PHYSICAL ASSETS 1
 - 2.3. PROTECTION OF INFORMATION..... 2
- 3. POLICY OBJECTIVE 2
- 4. POLICY REQUIREMENTS 2
 - 4.1 CHIEF SECURITY OFFICER 2
 - 4.2 PROFESSIONAL SECURITY CAPACITY 3
 - 4.3 OCCUPATIONAL HEALTH AND SAFETY AND SECURITY AWARENESS 4
 - 4.4 SECURITY RISK MANAGEMENT..... 4
 - 4.5 PHYSICAL SECURITY AND OPERATIONAL MEASURES..... 4
 - 4.6 REPORTING OF SECURITY INCIDENTS 5
 - 4.7 BUSINESS CONTINUITY PLANNING 5
 - 4.8 PERSONNEL SCREENING 6
 - 4.9 LOSS PREVENTION..... 7
 - 4.10 INFORMATION TECHNOLOGY SECURITY..... 7
 - 4.11 FIRE PROTECTION 7
 - 4.12 PROTECTION OF EMPLOYEES 8
- 5. INQUIRIES 8

1. INTRODUCTION

The National Gallery of Canada (the Gallery or NGC) is a federal Crown corporation subject to a number of federal laws related to the protection of individuals, as well as physical and intellectual assets. The Government of Canada's National Strategy for Critical Infrastructure calls for strengthening the resilience of critical infrastructure in Canada. Enhancing the resiliency of critical infrastructure can be achieved through the appropriate combination of security measures to address intentional and accidental incidents, business continuity practices to deal with disruptions and ensure the continuation of essential services, and emergency management planning to ensure adequate response procedures are in place to deal with unforeseen disruptions and natural disasters.

To safeguard its buildings and physical assets, including the national collection and other works of art in the Gallery's care, and to provide a safe environment for the visiting public, staff, volunteers and contractors, the Gallery has implemented a comprehensive and robust security program.

As a Crown corporation, the Gallery is not subject to the Treasury Board's *Policy on Government Security* (PGS) or the *Directive on Security Management* (DSM). The Gallery does, however, adopt government security best practices in providing a secure environment for the visiting public, staff, volunteers and contractors, and for the assets entrusted to its care.

To this end, the Gallery's *Security Policy* follows basic principles outlined in the federal government's PGS and DSM that are appropriate to the protection of the its assets. The Gallery also applies the principles of the *Standard on Security Screening*, which forms part of the PGS, having promulgated its own internal *Policy on Personnel Screening* to facilitate proper security screening of its employees, volunteers and contractors.

2. CONTEXT

2.1 Protection of People

The Gallery main building at 380 Sussex Drive welcomes several hundred thousand visitors each year, including those attending special events. The institution employs approximately 250 staff, along with a large number of contract personnel for security, building operations, and food and janitorial services. Additionally, a large cadre of volunteers contributes to the Gallery's programming.

2.2 Protection of Physical Assets

The Gallery's property holdings consist of its main building on Sussex Drive in Ottawa, three offsite storage facilities within the National Capital Region, and the Canada Pavilion in Venice, Italy — a property for which the Gallery is responsible (with outsourced security services). The complex at 380 Sussex Drive comprises a gross area of 72,180 square metres and includes 11,999 square metres of exhibition spaces, a 400-seat auditorium, art-storage areas, seminar and meeting rooms, loading docks, food-services areas, a retail outlet, a two-level indoor parking garage, staff offices, and an exterior amphitheatre and gardens.

The national collection includes more than 80,000 works of art, along with extensive library and archival holdings. In addition to works of art in Gallery's custody in Ottawa, each year,

approximately 400 to 600 works of art from the national collection are in the care of other institutions as part of outreach travelling shows or the Gallery's loans-out program. Before lending art, the Gallery ensures that borrowing institutions are able to meet requirements of proper security and environmental conditions, as outlined in the *NGC Loan Policy*.

2.3. Protection of Information

The National Gallery of Canada requires that information be managed as a strategic resource, supported by common processes, standards, roles and enabling technologies. Guidance for the management and protection of the Gallery's extensive information assets is articulated in the Gallery's separate *Policy on Information Management*.

3. POLICY OBJECTIVE

The objective of the National Gallery of Canada's *Security Policy* is to establish the principles within which the Gallery develops, implements, monitors and maintains a sound risk-based security program. This program will ensure a secure environment for the visiting public, employees and other personnel working or helping at the Gallery, including volunteers, interns, fellows, contractors, and students as well as the institution's physical, intellectual and cultural assets.

The Gallery's security program will follow the basic principles found in the PGS, one of which is the application of physical security safeguards (such as deter, detect, deny, delay, and defend), in order to provide reasonable assurance that individuals, information and assets are adequately protected.

4. POLICY REQUIREMENTS

The Gallery is committed to providing a secure environment for all individuals on site, and for the assets and information entrusted to its care. This will be attained through the policy requirements described below.

4.1 Chief Security Officer

The Gallery will designate the Chief of Protection Services as the Chief Security Officer (CSO), responsible for establishing and directing an adequate security program that ensures the coordination of all policy functions, and implementation of policy requirements. These functions include:

- a. Physical security of Gallery buildings their occupants and their content
- b. Security Screening of individuals in relation to access to Gallery buildings
- c. Business Continuity Management
- d. Security Requirements associated with contracts and other arrangements (e.g., security escorts)
- e. Security Event Management

- f. Security Awareness and Training
- g. Information Management Security*
- h. Information Technology Security*

*In coordination with the Chief Information and Technology Officer (CITO)

The CSO will provide Gallery-wide strategic advice and guidance to senior management on security-related matters. The CSO will also liaise with lead governmental agencies and other departments to ensure that the Gallery is well informed of changes in government policy, and made aware of any threats that could affect the institution.

The CSO serves as the lead Gallery contact with the Government Operations Centre (GOC) of Canada security command centre. The GOC provides an all-hazards integrated federal emergency response to events (potential or actual, natural or human-induced, accidental or intentional) of national interest. It provides 24/7 monitoring and reporting, national-level situational awareness, warning products and integrated risk assessments, as well as national-level planning and whole-of-government response management.

4.2 Professional Security Capacity

The Gallery will ensure that properly trained, equipped and qualified individuals are available at all times, ready to, and capable of, carrying out security-related responsibilities and responding to security incidents, emergencies, and/or injury or sudden illness to building occupants. To that end, the Gallery will:

- a. respond quickly to life-threatening emergencies, intervene, and provide lifesaving assistance to individuals in distress on its property, by having First Responders - trained in emergency First-Aid CPR, Mental Health First Aid, Automated External Defibrillator (AED) and Oxygen – for its Protection Services staff and among the security guards working under contract at the Gallery;
- b. ensure Protection Services operational staff that are not designated First Responders and Emergency Floor Wardens will receive Emergency First-Aid CPR, Mental Health First Aid, AED and Oxygen training;
- c. liaise with the contractor which provides outsourced security personnel to ensure their staff receive Emergency First-Aid CPR, AED and Oxygen training and that their supervisory and core staff permanently assigned to the Gallery also receive Mental Health First Aid training;
- d. maintain a network of trained and equipped volunteer staff members (Emergency Floor Wardens) to assist in facility emergencies and evacuations; and
- e. ensure that all Protection Services staff, as well as all contract security personnel, abide by any and all legislation governing the licensing of individuals to carry out professional security work in their designated positions, and/or hold suitable professional designations in the security field.

4.3 Occupational Health and Safety and Security Awareness

The Gallery will carry out its occupational health and safety responsibilities to ensure the safety of individuals in the workplace. To that end, the Gallery will:

- a. abide by all relevant Occupational Health and Safety legislation;
- b. promote awareness of safety in the workplace and provide related training; and
- c. maintain a Security Awareness Program to educate on-site individuals on the importance of security in the workplace, and how they can assist.

4.4 Security Risk Management

The Gallery is committed to the management of risks to the security of building occupants, cultural assets and physical infrastructure. To that end, the Gallery will:

- a. identify threats to people, assets and infrastructure, and define security priorities based on the results of threat and risk assessments, or analysis of various options;
- b. apply appropriate security counter-measures to mitigate these threats;
- c. evaluate external threats and risks to the security of the Gallery's collection while in transit or on loan, and to works of art within its care, and apply appropriate security counter-measures to mitigate and prevent these threats;
- d. request a facility report and physical security surveys to gauge a borrowing institution's environmental controls, fire-detection and fire-suppression systems, and physical security, as well as protection services and response capabilities; and
- e. ensure that the physical security requirements outlined in loan agreements with lending and borrowing institutions are met.

4.5 Physical Security and Operational Measures

The Gallery will have appropriate physical security measures in place to prevent, detect and respond to any unauthorized access to its property. To that end, it will:

- a. use deterrents to crime, including appropriate signage, physical and psychological barriers, exterior lighting, physical patrols, physical escorts, security hardware and software;
- b. follow PGS//DSM guidelines by designating security zones for various areas of the Gallery's buildings, and apply appropriate security measures, including security escorts, to each of these zones;
- c. maintain access-control measures, as defined in the Gallery's *Building Access Control Policy*, to grant or deny entrance to designated areas;
- d. use high-quality locking hardware and maintain a sound key-control system; keys will be

issued to (and recovered as required) only those persons having an operational requirement for them;

- e. require that individuals and their personal belongings — as well as any packages entering or leaving the Gallery buildings — be subject to a reasonable visual or electronic search by security personnel;
- f. monitor security, fire and environmental alarm systems in the Gallery buildings, and respond to alarm signals appropriately;
- g. recognize that proper maintenance of, and upgrades to, security, fire and environmental systems are critical to the effective functioning of the security program;
- h. acknowledge that, to achieve required security within a project, expansion or new building, security requirements and concerns must be considered from the early planning stages;
- i. adjust physical security safeguards to reflect changes in risk, and to benefit from new cost-effective technologies; and
- j. use surveillance equipment, such as a closed-circuit television (CCTV) system and cameras, pursuant to the *Guidelines for the Use of Video Surveillance*.

4.6 Reporting of Security Incidents

Through effective reporting and investigation of security incidents, vulnerabilities can be determined and the risk of future occurrence reduced. To achieve this, the Gallery will:

- a. maintain procedures for reporting and investigating all security-related incidents, taking prompt corrective action, and recording details in a timely manner;
- b. investigate all security-related incidents that are either suspected of being, or that constitute, criminal offences and report them to the appropriate law enforcement authorities; and
- c. report all incidents involving employee injury to the Health and Safety Committee, and to the Health and Safety Officer appointed under the *Canada Labour Code*.

4.7 Business Continuity Planning

The Gallery will have a control plan in place related to the organization, its resources and potential disasters, based on an all-hazards approach. It will use the Incident Command System to respond effectively to threats, protect life, reduce the exposure of critical assets, control loss if assets are exposed, and restore normal operations as quickly as possible. To achieve this, the Gallery will:

- a. maintain a disaster control plan, known as the *Business Continuity Plan* — based on four pillars: prevention, preparedness, response and recovery — which will specify actions to be taken in the event a threat occurs;
- b. assign roles and responsibilities to fulfill the needs of the Emergency Operations Centre,

and identify command structure and section leads with a minimum of two alternates, to ensure the continuity of authority, decision-making and communication;

- c. ensure that Responsibility Centre Managers complete and maintain their department's individual recovery plans;
- d. maintain a Pandemic Advisory Committee, consisting of Senior Management and Responsibility Centre Managers who will oversee the implementation of pandemic-related protocols;
- e. ensure that the *Business Continuity Plan* is reviewed and updated on a regular basis by a designated committee consisting of Senior Managers, Responsibility Centre Managers and select Gallery staff;
- f. test the *Business Continuity Plan* regularly and ensure that business resumption is attained within an acceptable timeframe;
- g. take ongoing action to mitigate identified threats;
- h. enter into agreements with outside institutions, associations or individuals that can aid in dealing with such threats;
- i. call upon external emergency services to assist, should their assistance be required; and
- j. carry out post-mortem investigations following crisis situations.

4.8 Personnel Screening

In accordance with the Gallery *Policy on Personnel Screening*, the Gallery will:

- a. undertake screening checks to verify personal data, educational and professional qualifications, previous employment, and the personal references of individuals seeking employment with the Gallery, to ensure that they are reliable and trustworthy;
- b. conduct required Reliability Status checks, criminal-record checks and credit checks for all employees, and (where applicable) for designated contractors and volunteers;
- c. notwithstanding section 4.8.b, there may be situations when it is not possible to conduct a Reliability Status check for a contractor (e.g., unforeseen mechanical failure that requires immediate emergency repair) — in such cases, the Gallery will provide a security escort to contractors without a valid Reliability Status while on Gallery premises, and exceptions to the requirement for an escort must be approved by the CSO;
- d. ensure that a security clearance of *Secret (Level II)* be sought for all Senior Managers, Responsibility Centre Managers, Protection Services staff, and individuals requiring access to information classified as Protected B and Secret; and
- e. regularly update background checks and security clearances every ten (10) years or as required

4.9 Loss Prevention

The Gallery's collection and physical assets as well as its materials and equipment will be safeguarded as required. Procedures and preventative measures will be used to limit access and movement of such assets. To achieve this, the Gallery will:

- a.** maintain asset and inventory lists by department, and register the collection with required identification numbers;
- b.** ensure that records requesting the movement or removal of assets are signed only by individuals duly authorized to do so;
- c.** document the entry and removal of collection and other assets to/from Gallery buildings;
- d.** document the internal and external movements of all cultural property; and
- e.** carry out collection inventory verifications, as established by management and approved by the Board of Trustees.

4.10 Information Technology Security

Information Technology (IT) systems must be secured against rapidly evolving threats that have the potential to affect their confidentiality, integrity, availability, intended use and value. In recognition of the importance of IT security, the Gallery will focus on security controls, monitor service-delivery levels, track and analyze threats to its IT systems, and establish effective incident-response and IT-continuity mechanisms.

In addition to continuing periodic, independent assessment against the PGS/DSM (Appendix B - Procedures for information Technology Security Control) standard, the Gallery's Information Technology Services Division will ensure that its security and disaster-recovery procedures are aligned with the Gallery's *Business Continuity Plan*.

4.11 Fire Protection

The Gallery is committed to protecting the building, its occupants, and its contents against hazards caused by fire. To achieve this objective, the Gallery will:

- a.** maintain an electronic fire-alarm system capable of the detection and suppression of potential fire hazards;
- b.** train individuals in alarm-system operation and monitor the system continually;
- c.** abide by all relevant fire-protection standards in all its buildings, and comply with any locally legislated fire regulations;
- d.** publish, implement and maintain fire-evacuation plans that reflect the needs of visitors, staff, volunteers and contractors during fire emergencies; and
- e.** require that institutions borrowing works from the Gallery's collection submit a facility report, which will be used to gauge a borrowing institution's fire-prevention capability.

4.12 Protection of Employees

Under the *Canada Labour Code*, Part II, the Gallery is responsible for the health and safety of its employees at work. This responsibility extends to situations where employees are under threat of harassment or violence because of their duties, or because of situations to which they are exposed. The Gallery will maintain a *Harassment and Violence Prevention Policy* to address this requirement.

5. INQUIRIES

Questions concerning the interpretation of this policy should be addressed to the Chief of Protection Services.

REFERENCES

Canada Labour Code
National Gallery of Canada, Building Access Control Policy
National Gallery of Canada, Business Continuity Plan
National Gallery of Canada, Video Surveillance, Collection, Use, and Disclosure Policy
National Gallery of Canada, Harassment and Violence Prevention Policy
National Gallery of Canada, Loan Policy
National Gallery of Canada, Policy on Information Management
National Gallery of Canada, Policy on Personnel Screening
Public Safety Canada, National Strategy for Critical Infrastructure
Treasury Board of Canada, Policy on Government Security
Treasury Board of Canada, Directive on Security Management
Treasury Board of Canada, Standard on Security Screening