London Public Library

REPORT TO THE LIBRARY BOARD

OCTOBER 22, 2026

SUBJECT: Policy Review – Communications Policy

PURPOSE: For Approval

PREPARED BY: Ellen Hobin – Director, Communications & Development

PRESENTED BY: Ellen Hobin – Director, Communications & Development

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RECOMMENDATION

It is recommended that the Library Board approve revisions to the Library's *Communications Policy*.

BACKGROUND

The purpose of this policy is to ensure that the Library's external communications are engaging, professional, accessible and well-managed.

The current policy, a summary of significant revisions, and the revised policy are appended.

NEXT STEPS

Upon approval, the Library's *Communications Policy* will be updated to incorporate revisions and post online. As part of the Board Policy Revision Cycle, the next review of this policy is scheduled in December of 2030 unless it is deemed necessary to review sooner.

CURRENT POLICY

PURPOSE:

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

SCOPE:

This policy refers to all forms of external communications, in all mediums, by Library Board Members, Employees and Volunteers.

DEFINITIONS:

Communications means the interaction between two or more people or groups, where information and other content is provided, sent or received. For the purposes of this policy, Communications referred to are external.

Communications Channel means a 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.

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 that can be used to identify an individual.

Transparency means business and financial activities are conducted openly in a fair and honest manner.

Volunteer means a person who voluntarily extends their 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:

The 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 its commitment to responsive public service;
- support intellectual freedom and protect privacy rights;
- ensure that communication materials represent the diverse nature of the community and are considered through an anti-racism/anti-oppression lens;
- ensure that Communications comply with accessibility legislation and standards;
- provide information in multiple formats using multiple Communications Channels and Communications Platforms so that a variety of a person's needs can be met for library services;
- communicate possible barriers to access, and dangers, hazards or threats to public health and safety as needed;
- ensure that the Library Board and all Employees work together to achieve clear and effective Communications with the public; and,
- manage Communications effectively, efficiently and in a financially responsible manner.

Communications Management

The CEO & Chief Librarian (CEO) and the Manager, Communications are accountable for Communications management. Communications requirements will be identified and met when planning, managing or reviewing policies, programs, services or initiatives.

- *Technological Innovation and New Media*
  The Manager, Communications will implement strategies to ensure that technology and new media advance the Library's ability to connect with the public in an efficient and effective manner.

- *Partnerships and Collaborative Arrangements*
  Communications requirements will be considered when planning, negotiating or implementing a partnership or other collaborative arrangement. Agreements governing collaborative arrangements will establish the Communications roles and responsibilities of the parties involved.

- *Environmental Stewardship*
  The Library will endeavor to be environmentally responsible in the management and delivery of Library Communications and the marketing of Library services and initiatives.

Corporate Identity

The Library will maintain a clear and consistent corporate identity to help the public recognize and understand Library policies and services.

Media Relations

The Library will operate and respond effectively in London's media environment. The Manager, Communications and CEO will proactively reach out to and inform the media about issues of importance to decision-makers and the public. The Library will engage the media using all communication tools at its disposal.

Media enquiries will be answered promptly, whenever possible and prudent, to meet publication deadlines. The CEO and/or the Library Board Chair (or designate(s)) will be the spokesperson for media inquiries and/or when statements on behalf of the Library are required. These spokespersons may assign other representatives to speak on certain topics as appropriate.

Employees, Volunteers and Board Members will inform their Manager, the CEO, and/or the Manager, Communications immediately if they are contacted by the media and will not speak on behalf of the Library and/or the Library Board unless they have been asked to do so by the CEO or the Manager, Communications.

Communicating with the Public

Employees are encouraged to 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.

The Library's expectations for Communications with the public by Employees, Volunteers and Board Members are thus that Employees, Volunteers and Board Members will:

- act in a manner of mutual respect and not engage in harassing or bullying behaviours;
- act in an inclusive manner and not engage in discrimination based upon age, ancestry, citizenship, creed, colour, race, ethnic origin, place of origin, disability, family status, marital status, gender identity, gender expression, sex, sexual orientation, education or socioeconomical status;
- provide relevant information that is useful and timely in accordance with Library services standards;
- communicate in a positive manner, using respectful language;
- protect and not disclose Personal Information and/or other protected or classified information;
- respect the Non-partisanship and impartiality of the Library; and,
- respect intellectual property, including copyright.

Email Communications and CASL Compliance

The Library will send external electronic messages (emails) to support and market Library services to patrons, partners, clients, vendors, contractors, tenants, donors and the community at large and must comply with Canada's Anti-Spam Legislation (CASL).

For the purposes of this policy, and in accordance with CASL, a reference to the person to whom an email is sent means the holder of the account associated with the email address to which the message is sent, as well as any person who it is reasonable to believe is or might be authorized by the account holder to use the email address.

Collection, storing and management of email addresses by the Library shall be as follows:

a. Email addresses for Library patrons collected by or on behalf of the Library for the purposes of the provision of core library services, including but not limited to, lending services and programming, shall be entered, stored and managed by the Library in the Library's Integrated Library System (ILS) and event registration platforms (ERP).

b. Email addresses collected for Library patrons shall be imported, stored and managed by the Library in an email marketing software database (EMD). Email addresses will also be collected on the Library's website through direct requests to subscribe by patrons and the wider public. The EMD is used for communicating Library news and occasional fundraising opportunities on a scheduled basis to subscribers.

c. Email addresses for Library room booking clients collected by or on behalf of the Library shall be entered, stored and managed by the Library in its Room Booking System (RBS). The RBS is used for business transactions relating to the booking of meeting space.

d. Email addresses for Library donors collected by or on behalf of the Library shall be entered, stored and managed by the Library in the Library's Donor Database (DD).

Staff who obtain and/or collect email addresses on behalf of the Library will enter the email addresses into the appropriate database(s), in accordance with the Library's *Access to Information and Protection of Privacy Policy*, *Records Management Policy* and other applicable policies and procedures respecting the collection of Personal Information.

The Library, when requesting consent via email, will set out clearly and simply the following information:

- a request that the recipient consent to receive emails from the Library;
- the purpose for which the consent is being sought;
- the Library's name and mailing address;
- the Library's email address/telephone number/website; and,
- a statement that consent may be withdrawn at any time via an unsubscribe mechanism.

Employees, requesting oral consent either in person or by telephone on behalf of the Library, shall identify themselves as Library Employees and follow the procedures above. If consent is requested by telephone, the individual seeking the consent shall request that the person send an email or text message to a designated Library email address with the following sentence: "I/we hereby consent to receive electronic communications from London Public Library."

An Employee who obtains consent on behalf of the Library shall enter the consent into the ILS, ERP, EMD, RBS or DD within two (2) business days of receiving it, or as soon as is reasonably possible, in accordance with the Library's procedures.

On occasion, the Library may exercise its right of exemption under CASL to send emails for the primary purposes of raising funds as a Registered Charity.

The Library will use an opt-in approach based on a person's consent to provide their email address and to receive emails and will not send messages to persons unless they have requested such Communications and/or have provided implied or express consent in accordance with CASL and this policy.

All Persons who receive emails from the Library have the ability to unsubscribe, i.e., opt out. Requests to unsubscribe from electronic messages shall be entered into the Library's ILS, ERP, EMD, RBS and DD within two (2) business days of being notified of the request, in accordance with the Library's procedures. Library patrons can also update their own accounts and can stop receiving emails from the ILS by removing their email addresses.

Any person, including a Library patron, who uses Library equipment or the Library's connection to the Internet must carry out their activities in a manner that is compliant with CASL. See the Library's *Internet Policy* for further details.

Library-Owned Intellectual Content

All intellectual content created by Library and Employees, Volunteers and Board Members 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 Library online and social media channels. Library content may be reproduced by others with appropriate acknowledgement and/or used in accordance with Canadian copyright law. Questions regarding use and acknowledgement of content will be handled by the office of the CEO.

Records Management

The Library is responsible for the custody and control of its intellectual content as "records" in accordance with the Library's *Records Management Policy*.

The Library will ensure that relevant content can be stored and retrieved and that the Library's records management requirements and procedures are followed.

Accessibility

The Library will communicate in accordance with the Library's *Accessibility for Users with Disabilities Policy* and *Accessibility Plan*.

Access to Information and Protection of Privacy

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

Inappropriate Content

In accordance with the Library's *Rules of Conduct*, *Internet Service Policy* and *Technology Use Policy*, inappropriate content, as determined by the Library, will not be communicated or shared using the Library's Communications Channels, Communications Platforms or equipment.

Non-Partisan Content

The Library strives to be Non-partisan in our services, spaces and Communications and must abide rules set forth in the Library's *Elections Policy*.

Communications Regarding Personnel Matters

Employees, Board Members, and Volunteers who receive Communications about other Library Employees, Board Members or Volunteers that would include that which meets the definition of Personal Information will refer the Communications to the CEO and/or Director, Human Resources.

Crisis and Emergency Communications

In the event of a crisis or emergency in which the Library is involved, the Library 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 as per the Library's *Business Continuity Policy and Plan*.

The Library CEO and/or the Library Board Chair and/or the Manager, Communications assumes the role of spokesperson for crisis or emergency Communications and the steward of the Library's reputation.

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

Risk Management

The Library's brand and reputation shall be protected and used to maximum effect. 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 Library Board, Employees or Volunteers.

The Manager, Communications and the Director, Information Technology are responsible for ensuring that any unique risks to information, information technology assets and service delivery associated with the use of Communications Platforms, tools and services are assessed, documented and understood, and that risk management and business continuity protocols are in place.

Issues Specific to Social Media

Information shared on social media platforms by a Library Employee, Board Member or Volunteer, by virtue of their employment or relationship with the Library, may be perceived as a corporate position rather than a personal opinion and should be avoided.

Social media accounts that are created and used for Library business should be linked to a Library email address and should be used exclusively for professional purposes and not personal use.

Accountability

The CEO is responsible for ensuring this policy is adhered to by Employees, Board Members and Volunteers. The Manager, Communications is accountable to the CEO

for managing Communications and meeting and adhering to policy directives and guidelines.

SUMMARY OF SIGNIFICANT REVISIONS

- Cosmetic changes (capitalizing bullets)
- The title of Manager, Communications has been updated to Director, Communications & Development
- The Email Communications and CASL Compliance section has been simplified to focus on policy statement.
- Internet Service Policy and Technology Use Policy references have been replaced with single Technology and Internet Use Policy.

REVISED POLICY

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POLICY STATEMENT

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- 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 its commitment to responsive public service;
- Support intellectual freedom as per the Library's *Intellectual Freedom Policy*;
- Protect privacy rights as per the Library's *Access to Information and Protection of Privacy Policy*;
- Ensure that communication materials represent the diverse nature of the community and are considered through an anti-racism/anti-oppression lens;
- Ensure that Communications comply with accessibility legislation and standards;
- Provide information in multiple formats using multiple Communications Channels and Communications Platforms so that a variety of a person's needs can be met;
- Communicate possible barriers to access and dangers, hazards or threats to public health and safety as needed;
- Ensure that the Library Board, Employees and Volunteers work together to achieve clear and effective Communications with the public; and,
- Manage Communications effectively, efficiently and in a financially responsible manner.

Communications Management

The CEO & Chief Librarian (CEO) and the Director, Communications and Development are accountable for Communications management. Communications requirements will be identified and met when planning, managing or reviewing policies, programs, services or initiatives.

- *Technological Innovation and New Media*
  The Director, Communications and Development, in consultation with the Director, Information Technology, will implement strategies to ensure that technology and new media advance the Library's ability to connect with the public in an efficient and effective manner.

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- Provide relevant information that is useful and timely in accordance with Library services standards;
- Communicate in a positive manner, using respectful language;

- Protect and not disclose Personal Information and/or other protected or classified information;
- Respect the Non-partisanship and impartiality of the Library; and,
- Respect intellectual property, including copyright.

Email Communications and CASL Compliance

The Library collects, stores and manages email addresses for purposes related to Library operations, programs, fundraising, room bookings and rentals, and other Library services. Email addresses are collected and managed through various Library platforms and databases, depending on their use.

The Library is committed to protecting Personal Information and ensuring that email addresses are collected, stored, accessed, used and disclosed in accordance with Canada's *Anti-Spam Legislation* (CASL), the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA), the Library's *Access to Information and Protection of Privacy Policy*, *Records Management Policy* and other applicable legislation and policies.

The Library will comply with CASL requirements when sending electronic messages (emails), including obtaining consent where required, providing appropriate sender identification and contact information, and offering a clear 'unsubscribe' mechanism. Email addresses will only be used for authorized purposes consistent with the purpose for which they were collected and the consent that was provided. The Library will take reasonable measures to protect email addresses from unauthorized access, use or disclosure, regardless of the platform in which they are stored.

Library Employees are responsible for adhering to applicable legislation, Library policies and established procedures when collecting, managing, and using email addresses for Library business.

Any person, including a Library patron, who uses Library equipment or the Library's connection to the Internet must carry out their activities in a manner that is compliant with CASL. See the *Library's Technology and Internet Use Policy* for further details.

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INQUIRIES

CEO & Chief Librarian
Director, Communications and Development