



## Landscape of Grand Pré Inc.— Le Paysage de Grand-Pré inc.

### Communication Policy

Policy Sponsor:	Governance and Nominating Committee
Policy Contact:	Executive Director
Effective Date:	2017-11-15
Approval:	Board of Directors
Approval Date:	2017-11-15
Review Date:	Every 2 years or as needed

#### 1. Purpose and Application

This Communication Policy is to establish requirements and guidelines for Landscape of Grand Pré Inc. ("**Corporation**") for external communications by the Corporation, including the sharing of information about the Corporation to the public, visitors, stakeholders, donors and media. This policy applies to all directors, officers, employees, contractors, and volunteers of the Corporation.

#### 2. Guiding Principles

The success and long-term viability of Landscape of Grand Pré Inc., and the UNESCO World Heritage Site to which it dedicates its work, is furthered by positive and balanced relationships with its stakeholders, communities and the public. The Corporation's aim for these relationships is effective consultation and cooperation, to be achieved through transparent and timely communications. Internal and external communications will be conducted with honesty and integrity and will respect the Corporation's Code of Conduct.

Open dialogue, including difference of opinion must occur with respect. Destructive criticism, which is designed to detract from the Corporation's business or harm another person, will not be permitted.

The corporation will foster a work environment where the diverse perspectives of everyone are respected.

### **3. Types of Information**

General and routine information is information that would not otherwise be classified as information required to be kept confidential, or private because of privacy laws.

Confidential information is information not widely disseminated within, or external to, the Corporation which, if disclosed, could be detrimental to the Corporation's interests by interfering with the Corporation's pursuit of a specific objective or strategy, with ongoing negotiations, or with its ability to complete a transaction, project or obtain funding.

Wherever practical, confidential information should:

- be identified as such;
- be stored in locked cabinets or rooms to which access is restricted, and/or be subject to secure limited access of electronically stored computer information;
- be removed promptly from meeting rooms at the conclusion of meetings;
- not be discussed in places where the discussion may be overheard; and
- not be copied unnecessarily or discarded where others can easily retrieve it.

Private information is information that meets the definition of Private Information in Canadian and provincial regulation. Private information will be secured and protected as required by such regulations.

The definitions of "confidential" and "personal" information, as provided in the Municipal Government Act of Nova Scotia, apply to Landscape of Grand Pré Inc. and are appended to this policy.

#### **4. External Communications**

All public statements made on behalf of the Corporation must be made or authorized by the Board Chair or the Executive Director.

No other officer, director, committee member, volunteer or contractor of the Corporation will speak to the media without the prior consent of the Board Chair or the Executive Director. Only the Board Chair and the Executive Director have authority to act as spokespersons for the Corporation. Generally, directors and committee members will not make public statements about the business of the Corporation, other than providing factual information about their association with the Corporation. Should a director be required to speak or make a presentation about the activities of the Corporation, she/he will consult the Executive Director about the specific details of the information to be provided.

The approval of the Board Chair or Executive Director is required before agreeing to make speeches or presentation about the Corporation.

Records of the Corporation are available to the members and the public upon request to the Board Chair or Executive Director, with the following notable exceptions:

- personal information
- law enforcement or legal proceedings information
- information which might violate the solicitor-client privilege
- a trade secret, a trademark, or commercial, technical, financial, or labour relations information which might, if released, harm the competitive or sustainable position of the Corporation; and
- draft or preliminary information which is not in final or approved form.

In the normal course of business, the Corporation will make all corporate and financial information filings as required by law. Any external requests for records or information regarding the Corporation should be directed to the Board Chair or Executive Director.

#### **5. Media / Press Communication**

All media relations activities are coordinated by the Executive Director who will consult with the Board Chair on the appropriate action and spokesperson assignment. Unless otherwise

authorized by the Board Chair, media relations activities and media interviews are restricted to the Board Chair and the Executive Director. In addition, the Board Chair is the primary spokesperson for the Corporation on matters of corporate governance.

All media enquiries must be referred to the Executive Director as soon as possible for consultation with the Board Chair and for follow-up by a designated spokesperson.

From time to time, other designates or subject-matter experts may be called upon to speak to the media regarding specific areas of responsibility or subject matter. These opportunities will be pre-arranged in consultation with the Board Chair.

Unless in conflict with business purposes or the resources of the Corporation, media deadlines are to be respected wherever possible.

The designated spokesperson has a duty to speak truthfully and openly to the best of his/her knowledge regarding the Corporation, subject to any disclosure restrictions for confidentiality or privacy purposes.

## **6. Stakeholder Relations and Communication**

The Corporation fosters an approach and environment in which it actively seeks ideas, input and feedback from stakeholders in order to advance the mandate of the Corporation and to cultivate connections with others. The Corporation especially recognizes the unique cultural and historic perspectives of Indigenous Peoples, the Acadians, and the local community in these efforts.

Those acting on behalf of the Corporation are receptive to the input of others and capture it for consideration by the Corporation. When disagreements occur and remain unresolved, it is important that directors, officers, employees, volunteers and contractors respect the views presented. As determined appropriate by the Board or the Executive Director, the Corporation will provide relevant, timely and transparent communications to the public.

The Corporation will use the most cost effective and appropriate means of communicating and consulting with stakeholders, which may include using its website, social media, electronic

communications and newsletters, surveys, public events, focus group discussions or open house events.

## 7. Review and Amendment

This Communication Policy will be reviewed every two years or as needed and may only be amended by the Board.

Approval Date: November 15, 2017

Review Date: March 4, 2020

### Appendix

*While these definitions are found in the Municipal Government Act of Nova Scotia, they apply to Landscape of Grand Pré Inc. Whenever the term “municipality” is found, it is interchangeable with Landscape of Grand Pré Inc.*

### **“Confidential information”**

1. The responsible officer shall, unless the third-party consents, refuse to disclose to an applicant information
  - (a) that would reveal
    - (i) trade secrets of a third party, or
    - (ii) commercial, financial, labour relations, scientific or technical information of a third party;
  - (b) that is supplied, implicitly or explicitly, in confidence;and
  - (c) the disclosure of which could reasonably be expected to
    - (i) harm significantly the competitive position, or interfere significantly with the negotiating position, of the third-party,
    - (ii) result in similar information no longer being supplied to the municipality when it is in the public interest that similar information continues to be supplied,

- (iii) result in undue financial loss or gain to any person or organization, or
- (iv) reveal information supplied to, or the report of, an arbitrator, mediator, labour relations officer or other person or body appointed to resolve or inquire into a labour-relations dispute.

2. The responsible officer shall refuse to disclose to an applicant information that was obtained on a tax return or gathered for the purpose of determining tax liability or collecting a tax, unless the third-party consents.

**“Personal information”**

(1) The responsible officer shall refuse to disclose personal information to an applicant, if the disclosure would be an unreasonable invasion of a third party’s personal privacy.

(2) In determining whether a disclosure of personal information constitutes an unreasonable invasion of a third party’s personal privacy, the responsible officer shall consider all the relevant circumstances, including whether

- (a) the disclosure is desirable for the purpose of subjecting the activities of the municipality to public scrutiny;
- (b) the disclosure is likely to promote public health and safety or to promote the protection of the environment;
- (c) the personal information is relevant to a fair determination of the applicant’s rights;
- (d) the disclosure will assist in researching the claims, disputes or grievances of aboriginal people;
- (e) the third party will be exposed unfairly to financial or other harm;
- (f) the personal information has been supplied in confidence;
- (g) the personal information is likely to be inaccurate or unreliable; and
- (h) the disclosure may unfairly damage the reputation of any person referred to in the record requested by the applicant.

(3) A disclosure of personal information is presumed to be an unreasonable invasion of a third party’s personal privacy if the personal information

- (a) relates to a medical, dental, psychiatric, psychological or other health-care history, diagnosis, condition, treatment or evaluation;

(b) was compiled, and is identifiable as, part of an investigation into a possible violation of law, except to the extent that disclosure is necessary to prosecute the violation or to continue the investigation;

(c) relates to eligibility for income assistance or social service benefits or to the determination of benefit levels;

(d) relates to employment or educational history;

(e) was obtained on a tax return or gathered for the purpose of collecting a tax;

(f) describes the third party's finances, income, assets, liabilities, net worth, bank balances, financial history or activities, or creditworthiness;

(g) consists of personal recommendations or evaluations, character references or personnel evaluations;

(h) indicates the third party's racial or ethnic origin, sexual orientation or religious or political beliefs or associations; or

(i) consists of the third party's name together with the third party's address or telephone number and is to be used for mailing lists or solicitations by telephone or other means.

(4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if

(a) the third party has, in writing, consented to or requested the disclosure;

(b) there are compelling circumstances affecting anyone's health or safety;

(c) an enactment authorizes the disclosure;

(d) the disclosure is for a research or statistical purpose and is in accordance with this Part;

(e) the information is about the third party's position, functions or remuneration as an officer, employee or member of a municipality;

(f) the disclosure reveals the amount of taxes or other debts due by the third party to the municipality;

(g) the disclosure reveals financial and other similar details of a contract to supply goods or services to a municipality;

(h) the information is about expenses incurred by the third party while travelling at the expense of a municipality;

(i) the disclosure reveals details of a licence, permit or other similar discretionary benefit granted to the third party by a municipality, not including personal information supplied in support of the request for the benefit; or

(j) the disclosure reveals details of a discretionary benefit of a financial nature granted to the third party by a municipality, not including personal information that is supplied in support of the request for the benefit or that relates to eligibility for or the level of income assistance or social service benefits.

(5) On refusing to disclose personal information supplied in confidence about an applicant, the responsible officer shall give the applicant a summary of the information unless the summary cannot be prepared without disclosing the identity of a third party who supplied the personal information, and may allow the third party to prepare the summary of personal information.

Revised by the Board on February 22, 2022