

REPORT TO COUNCIL

To: Mayor and Councillors

Subject: Mayor's Gala Discovery Review File #: 0110.00

Doc #: 170963

From: Francis Cheung, P. Eng.

Chief Administrative Officer

Date: March 13, 2020

RECOMMENDATION:

1. THAT Council receive the <u>Interim Report: Mayor's Gala Discovery Review</u> dated March 15, 2020 from Paul Gill for information.

2. THAT Council endorse the recommended actions as outlined in the Summary section of this report.

PURPOSE:

The purpose of this report is to present the <u>Interim Report: Mayor's Gala Discovery Review</u> to City Council for information.

POLICY:

Not applicable.

COMMENTS/ANALYSIS:

At the January 27, 2020 Regular Council Meeting, City Council unanimously passed the following motion:

"WHEREAS Langley City Council adopted the Use of Corporate Identity and Brand Policy CO-64 on November 4, 2019;



Subject: Mayor's Gala Review

Page 2

WHEREAS this policy ensures that only those initiatives being supported or endorsed by the City are granted permission to use the brand as applicable;

WHEREAS the use of the term Langley City Mayor's Gala, the City coat of arms and the RCMP coat of arms was used in advertising which suggests that this event was an official city event;

THEREFORE BE IT RESOLVED THAT as this is deemed to be an annual event, that staff prepare a report outlining the following:

- liability to Langley City;
- unauthorized use of the Langley City crest;
- use of the RCMP crest:
- use of the wording "Langley City Mayor" on marketing and advertising materials for a non-City event; and
- a financial report outlining all material and in-kind costs to Langley City associated with the Mayor's Gala, including RCMP costs."

The Chief Administrative Officer retained Mr. Paul Gill¹ to conduct a discovery review of the Mayor's Gala. The rationale for retaining a third party independent consultant to carry out the review include:

- City staff will not be placed in a position to question or arbitrate the conduct of the Mayor; and
- There will be a greater degree of confidence of the impartiality and objectivity of the review if it was conducted by a third party independent consultant.

The mandate of the review, which was unanimously approved by City Council, is as follows:

The consultant(s) shall investigate and prepare a report on the Mayor's Gala to fully address the motion passed by Council at the January 27, 2020 Regular Council Meeting.

The consultant(s) shall consider, but not be limited to, the following:

¹ Mr. Paul Gill has over 30 years of local government experience. He was the General Manager of Finance and Corporate Services for the City of Maple Ridge for much of this period with the last two years as the Chief Administrative Officer. Mr. Gill was the Principal Police Contact (PPC) for the City of Maple Ridge and he was instrumental in the creation of the Lower Mainland District RCMP Integrated Homicide Team. Mr. Gill was the former Chair of the CAOs/PPCs Forum and Integrated Team Advisory Committee. And he was the staff person appointed by the UBCM on the national RCMP Contract Management Committee representing the interest of local governments in British Columbia.



Subject: Mayor's Gala Review

Page 3

- Determine if the Mayor's Gala was a private fund raising event organized and hosted by Ms. Val van den Broek or a City sanctioned event organized and hosted by Mayor Val van den Broek with the support of the City.
- Determine if the use of the wording "Langley City Mayor" on marketing and advertising materials is appropriate for a non-City event.
- Determine the potential liability to the City if the Mayor's Gala was a private fund raising event organized and hosted by Ms. Val van den Broek.
- Determine the potential liability to the City if the Mayor's Gala was organized and hosted by Mayor Val van den Broek with the support of the City.
- Determine if proper process was followed under the City's Use of Corporate Identity & Brand Policy CO-64 to use the Coat of Arms on the marketing and advertising brochures.
- Determine if proper process was followed from the RCMP to use the RCMP Insignia on the marketing and advertising brochures.
- Determine the role and involvement of the RCMP and members of the Langley RCMP Detachment with the Mayor's Gala.
- Determine all material, staff costs and in-kind costs incurred by Langley City and the Langley RCMP associated with the Mayor's Gala.

Mr. Gill's discovery review of the Mayor's Gala and his findings are articulated in the Interim Report: Mayor's Gala Discovery Review (Attachment 1). The following is a brief summary of his findings:

- The use of corporate identity creates the appearance that this was a City event, though Council did not endorse it. This appears to go against the intent of Council Policy CO-64.
- Council Policy CO-64 should identify consequences for not abiding by the policy and the delegation of responsibility should be reviewed.
- A Code of Conduct should be considered which would include consequences for not abiding by the code.
- If this appears to be a City event, the City could have some legal exposure. However, this exposure is largely mitigated by steps that were taken by the Mayor.
- On a go-forward basis, where a member of Council wishes to pursue an initiative like this, there should be formal consultation with Council.
- Two staff members spent less than a total of two hours with logistics related to the event. This included the time that a staff member spent loading the Coat of Arms and logo onto a folder that was accessible by the Mayor.
- With respect to the use of the facility, the Convention Centre is owned by the City and is allotted six free bookings per year for its own use. The arrangement for the use of the facility for the gala was in the Mayor's personal name and will not count towards the uses allowed to the City.



Subject: Mayor's Gala Review

Page 4

- With respect to the RCMP, the Officer-In-Charge (OIC) authorized the use of the RCMP crest for the event.
- The Officer-In-Charge (OIC) sent an email to his senior officers to encourage them to attend. In the email, the OIC pointed out that a "Four-hour Overtime Shift (approved by him) is enough to cover the costs for 2 persons" for the tickets.
- 35 members attended the event and 19 of them came with spouses/quests. What this means is that a total of 54 tickets were paid for by the RCMP members for a total value of \$8,100.
- The OIC advises that RCMP members who attended the event were not paid for the time that they were at the gala, nor were they given extra time off for attending the gala. He also advises that no member has ever been approved to claim overtime without having to work for it.

Mr. Gill made several recommendations in his report for our consideration:

- On a go-forward basis, where a member of Council wishes to pursue an initiative like this, there should be formal consultation with Council.
- Council Policy CO-64 should be reviewed.
- A Council Code of Conduct should be developed and adopted.
- City staff should meet with the OIC to establish expenditure protocol and expectations for future initiatives like this.

BUDGET IMPLICATIONS:

Mr. Paul Gill's consultant fee to prepare the Interim Report: Mayor's Gala Discovery Review was \$6,000 inclusive of GST and disbursements.

ALTERNATIVES:

That Council direct staff to carry out a more detailed cost analysis to determine the salary and benefits costs and which accounts were charged to for those RCMP members that worked the four-hour overtime shift to cover the cost to purchase two tickets to the gala.



Subject: Mayor's Gala Review

Page 5

SUMMARY:

It should be noted that Mr. Paul Gill's report is an interim and discovery report. Upon review of the recommendations made by Mr. Gill in his report, it is recommended that the following actions be undertaken:

- 1. Mr. Gill concluded that it appears the use of corporate identity creates the appearance that this was a City event, though Council did not endorse it and it goes against the intent of Council Policy CO-64. On a go-forward basis, where a member of Council wishes to pursue an initiative like this, there should be formal consultation with Council.
- 2. Council Policy CO-64 does not identify consequences for not abiding by the policy. Staff supports this recommendation and this policy will be reviewed.
- 3. A junior staff, who is trying to be helpful and proactive, may carry out a task for any members of Council even if it was only mentioned by passing. Additionally, a junior staff may take action without recognizing the sensitivity of the matter. Therefore, staff supports the recommendation that the delegation of responsibility should be reviewed under Council Policy CO-64.
- 4. A Council Code of Conduct should be developed and adopted by Council which would include consequences for Council members for not abiding by the code. Staff supports this recommendation and a Council Code of Conduct will be developed with City Council.
- 5. While the Officer-In-Charge acknowledged that he had authorized a "Four-hour Overtime Shift" to cover the costs for two tickets for the gala and that legitimate work were carried out by the members, staff question the appropriateness of such expenditure even if it was well intended. To this end, staff supports the recommendation that City staff should meet with the OIC to establish expenditure protocol and expectations for future initiatives like this.

Respectfully Submitted,

Francis Cheung, P. Eng.

Chief Administrative Officer



Subject: Mayor's Gala Review

Page 6

Attachments:

- 1. Interim Report: Mayor's Gala Discovery Review by Paul Gill
- 2. Terms of Reference, Mayor's Gala Review
- 3. Use of Corporate Identity & Brand Policy CO-64



Mr. Francis Cheung,
Chief Administrative Officer
City of Langley

Dear Mr. Cheung:

Re: Interim Report: Mayor's Gala Discovery Review

I have been asked to look into the Mayor's Gala that was held on January 25, 2020. The gala was a fundraising event with net proceeds going to the Langley Hospital Foundation. At the January 27, 2020 Regular Council Meeting, Council passed a motion asking a series of questions about the event. The questions revolve around the following themes:

- Whether the event was a City event or a private event.
- Whether the guidelines in Council Policy CO-64 on the use of corporate identity were followed.
- · The ramifications of the event to the City.
- The resources expended by the City to support the event.

My review is based on discussions with a number of parties and at the outset, it is important to note that the issues that I heard about transcend the gala. I urge Council to work through these issues so that they can remain focused for the rest of the Council term. Further, while an understanding of what occurred is important, it is also important to consider what, if anything, could be done differently in the future. In other words, while there are lessons to be learned from this event, it is important for Council to find a path forward.

Members of Council are elected to represent the community. The duties and responsibilities of these positions are outlined in the Community Charter, however, from a practical perspective, the Mayor and Councillors represent the community around the clock, on a 24/7 basis. This means that it is very difficult to distinguish when a member of Council is acting in their elected capacity from when they are acting in their private capacity. This is even more difficult when elected officials are referred to by their titles and/or where corporate identity is used.

The City of Langley has a policy around the use of corporate identity and this policy was adopted on November 4, 2019. One of the aims of this policy is to distinguish the City's events and services from those of others. This is important for a number of reasons:

- If a function is being provided by others, the City should make sure it does not assume legal liabilities and obligations that should rest with others.
- Where the function is provided by the City, it should be provided to the City's standards, with full regard for the City's risk management practices.
- If the function is to be identified as a City service, it is important that it be aligned with the City's strategic direction.

If we examine the January 25, 2020 Mayor's Gala against this backdrop, the following points emerge:

- The event was advertised as the Mayor's Gala. Material related to the event included the City's Coat of Arms, logo and a photo of the Mayor with the Chain of Office. This use of corporate identity creates the appearance that this was a City event, though Council did not endorse it. This appears to go against the intent of Council Policy CO-64.
- If this appears to be a City event, the City could have some legal exposure. This exposure is largely mitigated by the following steps that were taken:
 - The agreement for the use of the facility was in the personal name of the Mayor, and not the City.
 - o Liability Insurance for the event was arranged through a private insurer.
 - o A Gaming License was obtained for the raffles and 50-50 draw.
 - Liquor service was handled by the operator of the facility, under their own licenses and permits.
 - Eventbrite was used to handle ticket sales and an accounting of the admissions is available through them.
- The event was in recognition of the contributions of the RCMP and served as a fundraiser for the local hospital. Both of these services are of great value to Council and the Community.
- The event served to engage community volunteers who found the event rewarding.

On a go-forward basis, where a member of Council wishes to pursue an initiative like this, there should be formal consultation with Council. The main reason for doing this is that while a Council member may wish to act in his/her capacity as an individual, it is difficult to do this, given the 24/7 nature of the elected position they hold. If Council does not support the event, that does not mean that it cannot be held. Rather, steps should be taken to mitigate the potential risk exposures to the City, as was done with the 2020 Mayor's Gala. Further, while Council Policy CO-64 provides direction on the use of corporate identity, I suggest that it be reviewed. Here are some of the factors that should be considered in that review:

- Council, staff and the public should understand the rationale for having such a policy and this rationale should be articulated in the policy.
- The policy should identify consequences for not abiding by this policy.
- The delegation of responsibility in the policy should be reviewed. As a general rule, Council member interactions with staff should be through the CAO.

Council may also wish to consider a Code of Conduct which would include consequences for not abiding by the code.

With respect to the City's resources expended to support this event, two staff members spent less than a total of two hours with logistics related to the event. This included the time that a staff member spent loading the Coat of Arms and logo onto a folder that was accessible by the Mayor. With respect to the use of the facility, the Convention Centre is owned by the City and is allotted six free bookings per year

for its own use. The arrangement for the use of the facility for the gala was in the Mayor's personal name and will not count towards the uses allowed to the City.

As far as the involvement of the RCMP is concerned, the Mayor asked the RCMP to be partners in the event. The Officer-in-Charge (OIC) was in support of this for a number of reasons including:

- He saw this as a way for the RCMP to positively contribute to a worthwhile community cause.
- He saw this as an opportunity for RCMP members to meet community partners who they may not get a chance to meet otherwise.
- RCMP members would be attending in red serge and the OIC saw this as a morale booster as
 members would be able to wear their red serge with pride and have positive interactions with
 each other and the public.

The OIC authorized the use of the RCMP crest for the event. He also sent an email to his senior officers to encourage them to attend. He did not want to reach out to the more junior members, until there was support from the more senior officers. In the email, the OIC pointed out that a "Four-hour Overtime Shift (approved by him) is enough to cover the costs for 2 persons". This line may have been interpreted differently by different people. The OIC advises that from his perspective, there is meaningful police work to be done and this work warrants the payment of overtime. Such work includes:

- Crime Scene security
- Surveillance
- · Proactive traffic enforcement
- Proactive police visibility efforts such as bike and foot patrols
- Ensuring public safety at public gatherings and events.
- · Catching up on priority paper work

As far as the OIC is concerned, there was no intent to pay overtime, simply to cover the cost of gala tickets. Rather, the intent was to make members aware that there were opportunities to earn additional income by doing meaningful work.

The OIC is following up to see what messages were passed on by others at the detachment. A summary of the tickets purchased by the RCMP follows:

35 members attended the event and 19 of them came with spouses/guests. What this means is that a total of 54 tickets were paid for by RCMP members for a total value of \$8,100.

The OIC advises that RCMP members who attended the event were not paid for the time that they were at the gala, nor were they given extra time off for attending the gala. He also advises that no member has ever been approved to claim overtime without having to work for it.

This is the first time that the detachment has participated in an event such as this and the OIC regrets the confusion that has been created around the tickets purchased by the RCMP. Steps will be taken to avoid such confusion in the future and additional questions should be referred directly to the OIC.

These are my initial findings based on interviews with several individuals. A summary of my recommendations is as follows:

- On a go-forward basis, where a member of Council wishes to pursue an initiative like this, there should be formal consultation with Council.
- Council Policy CO-64 should be reviewed.
- A Council Code of Conduct should be developed and adopted.
- City staff should meet with the OIC to establish expenditure protocol and expectations for future initiatives like this.

I hope this information is helpful and I would welcome your further direction.

Respectfully,

Paul Gill

LANGLEY

Terms of Reference

Mayor's Gala Discovery Review

1. Background:

Mayor Val van den Broek held a Mayor's Gala on January 25, 2020. It was a fund raising event in honour of Mayor van den Broek's mother with the proceeds going to the Langley Hospital Foundation.

At the January 27, 2020 Regular Council Meeting, City Council passed the following motion:

"WHEREAS Langley City Council adopted the Use of Corporate Identity and Brand Policy CO-64 on November 4, 2019;

WHEREAS this policy ensures that only those initiatives being supported or endorsed by the City are granted permission to use the brand as applicable;

WHEREAS the use of the term Langley City Mayor's Gala, the City coat of arms and the RCMP coat of arms was used in advertising which suggests that this event was an official city event;

THEREFORE BE IT RESOLVED THAT as this is deemed to be an annual event, that staff prepare a report outlining the following:

- liability to Langley City;
- unauthorized use of the Langley City crest;
- use of the RCMP crest;
- use of the wording "Langley City Mayor" on marketing and advertising materials for a non-City event; and
- a financial report outlining all material and in-kind costs to Langley City associated with the Mayor's Gala, including RCMP costs."

As referenced in the Council's motion, the marketing and advertising for the Mayor's Gala contains the City's Coat of Arms and the RCMP Insignia. A subsequent brochure for the Mayor's Gala depicts a photo of Mayor van den Broek with the Mayor's Chain of Office.

Under the City's Use of Corporate Identity & Brand Policy CO-64, it states, in part, that:



"This Policy clarifies, defines and governs the use of the City's Corporate Identity and Brand which includes the Logo, Coat of Arms and City Images.

This policy applies to Elected Officials and Staff, Stakeholders, and Person working on behalf of the City. This Policy ensures that only those initiatives being supported or endorsed by the City are granted permission to use the Logo as applicable.

This policy ensures the Coat of Arms is reserved for sanctioned protocol, historical and legal purposes; therefore, only the Logo can be requested for use. Unless written permission has been obtained from Designated Staff, and other use of the Logo is prohibited.

If the City becomes aware of unauthorized use of the Coat of Arms, Logo or City Images, it may pursue legal action. In order to protect the integrity of the symbol and graphic identity of the Logo. Stakeholders or Persons wishing to use the Logo must seek prior approval from Designated Staff.

The use of Logo, Coat of Arms, City Images and Brand is restricted to corporate activities, and City Images shall not be modified, copied, distributed, reproduced, published, licensed, transferred, in whole or in part, without the written consent of Designated Staff. Use of the Logo, Coat of Arms, and City Image, without the express prior written consent of Designated Staff is a violation of the City's intellectual property rights, and the City of Langley will protect such right to the fullest extent of the law."

The City has no knowledge if permission was sought and approval received from the RCMP to use their Insignia on the marketing and advertising brochures.

2. Mandate:

The consultant(s) shall investigate and prepare a report on the Mayor's Gala to fully address the motion passed by Council at the January 27, 2020 Regular Council Meeting.

The consultant(s) shall consider, but not be limited to, the following:

- Determine if the Mayor's Gala was a private fund raising event organized and hosted by Ms. Val van den Broek or a City sanctioned event organized and hosted by Mayor Val van den Broek with the support of the City.
- Determine if the use of the wording "Langley City Mayor" on marketing and advertising materials is appropriate for a non-City event.



- Determine the potential liability to the City if the Mayor's Gala was a private fund raising event organized and hosted by Ms. Val van den Broek.
- Determine the potential liability to the City if the Mayor's Gala was organized and hosted by Mayor Val van den Broek with the support of the City.
- Determine if proper process was followed under the City's Use of Corporate Identity & Brand Policy CO-64 to use the Coat of Arms on the marketing and advertising brochures.
- Determine if proper process was followed from the RCMP to use the RCMP Insignia on the marketing and advertising brochures.
- Determine the role and involvement of the RCMP and members of the Langley RCMP Detachment with the Mayor's Gala.
- Determine all material, staff costs and in-kind costs incurred by Langley City and the Langley RCMP associated with the Mayor's Gala.

The Consultant(s) may obtain legal and other appropriate advice to fulfill the mandate of this review.

The Consultant(s) shall protect the confidentiality of individuals being interviewed in connection with this review.

3. Access to Information:

All members of City Council, City Staff and members of the Langley RCMP Detachment shall cooperate fully with the Consultant(s) and provide all relevant materials to the Consultant(s) in order to fulfill the mandate of this review.

4. Reporting:

The Consultant(s) shall report directly to the Chief Administrative Officer.

5. Deliverable:

The Consultant(s) shall prepare and present this report to City Council at a Regular Council meeting within four weeks from the award of this assignment.



| | Title: Use of Corporate Identity & Brand | Number: CO- 64 |
|--|--|------------------|
| | Authority (if applicable): Council | Section: Council |
| | Date Adopted: November 4, 2019 | |
| | Historical Changes (Amended, | |
| | Repealed, or Replaced): | |
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Purpose:

This policy provides guidelines for the management of City's Corporate Identity and Brand and guides the proper use and display of the official Coat of Arms, Logo and City Images. The purpose is to maintain Brand continuity, consistency, and positive Brand Equity in all corporate Brand applications. This policy clarifies, defines and governs the use of the City's Corporate Identity and Brand which includes the Logo, Coat of Arms and City Images.

Scope:

This policy applies to Elected Officials and Staff, Stakeholders, and Persons working on behalf of the City. This policy ensures that only those initiatives being supported or endorsed by the City are granted permission to use the Logo as applicable.

Definitions:

Brand: the visual representation of the City; it distinguishes the organization from others in the eyes of the community at large. The City's Brand consists of Logo, Logo alternatives, colour standards, Brand architecture (department colours), typographic standards (typeface/font), and Brand graphics, stationary, print and digital templates, signage, City Images, some graphic design rules and elements. It is the overall visual appeal of the City.

Brand Equity: The value a consumer places on the Brand. Brand equity is more than the value placed on a particular product or service; it encompasses everything that a consumer thinks, feels and knows about the Brand.

City: means the City of Langley.

City Images: means all images owned by the City other than the Coat of Arms and Logo, including but not limited to print and digital photos, images, artwork, slogans, audio clips and video clips.

Coat of Arms: means the City of Langley's Coat of Arms.

Corporate Activities: mean business activity undertaken by the City; covering all the functions, processes, activities and transactions of an organization including the City's Elected Officials and Staff.

Corporate Identity: means the manner in which the City presents itself to the public (such as stakeholders and residents as well as staff). Corporate Identity defines how the Brand is used within a set of corporate guidelines that are defined in the Logo Use Guide and Corporate Identity Manual.

Corporate Identity Manual: means the guidelines that govern how the Brand is applied and used by Staff.

Designated Staff: means authorized exempt Staff who have approval to give Persons and Stakeholders permission to use the Logo.

Unless otherwise authorized, Designated Staff for the City are:

- Chief Administrative Officer (CAO);
- Members of the Senior Management Team and their designate(s);
- Communications Officer:
- Other Staff as authorized by the Communications Officer.

Elected Official(s): a member of City Council including the Mayor.

Logo: means the City's Logo as approved by Council.

Logo Use Guide: means the City's guidelines that govern how the Logo is applied and used.

Person(s): an individual, corporation, partnership or any other legal entity.

Staff: means regular full-time, regular part-time, temporary full-time, and casual employees, as well as any individual retained by the City who is acting on the City's behalf.

Stakeholder(s): means residents, businesses, community groups, municipal neighbours, elected officials, municipal candidates, volunteers, provincial and federal governments, boards, committees, authorities, agencies, consultants, contractors, associations and anyone with an interest in municipal affairs.

Policy Statement:

The consistent and correct application of the City's Corporate Identity and Brand is a valuable organizational asset that distinguishes the City's services from those of other organizations.

The City of Langley's Coat of Arms and Logo are registered and protected under the Trade-marks Act of Canada.

This policy ensures the Coat of Arms is reserved for sanctioned protocol, historical and legal purposes; therefore, only the Logo can be requested for use. Unless written permission has been obtained from Designated Staff, any other use of the Logo is prohibited.

If the City becomes aware of unauthorized use of the Coat of Arms, Logo or City Images, it may pursue legal action. In order to protect the integrity of the symbol and graphic identity of the Logo, Stakeholders or Persons wishing to use the Logo must seek prior approval from Designated Staff.

Principles:

Corporate Identity is a combination of many factors, such as the name, Logo, Coat of Arms, symbols, design, City Images, packaging, and the manner in which the City presents themselves to the public.

The Brand must have a consistent quality and character that accurately and honestly reflects the City and its aims. Signage, City Images, uniforms and vehicles are visible components that must reflect this consistency.

Education from the Communications Officer shall be provided to all Elected Officials, Staff, Stakeholders, and Persons working on behalf or with the City, regarding the basic requirements of the City's Brand.

Guidelines for proper use of the Logo are contained in the Logo Use Guide. Guidelines for proper use of the City's Corporate Identity is in the Corporate Identity Manual.

Roles and Responsibilities:

Designated Staff will grant permission to display or otherwise use the City's Logo subject to the provisions of this Policy, including the following conditions for the use of the Logo:

- Reproduction of the Logo shall adhere to the Logo Use Guide wherein the technical specifications of the Logo are prescribed;
- Permission to use the Logo may not be transferred or extended to any other Persons or Stakeholders;
- Users acknowledge and agree that the City assumes no liability with respect to the
 use of the Logo and shall be required to release, defend and indemnify the City and
 hold it harmless from any demands, claims, damages, losses or liabilities which
 directly or indirectly arising from:
 - the use of the Logo;
 - the user's failure to comply with any provision of this policy;

- Users shall, at their own expense, provide a sample of each product and any
 material upon or in which the Logo is used to Designated Staff who authorized the
 use of the Logo;
- Permission constitutes a license to use the Logo and the City reserves the right, in
 its sole discretion, to terminate or modify permission to use the Logo at any time and
 without prior notice upon termination, all use of the Logo must cease immediately;
 and.
- Users shall not threaten or commence any claim against a third party regarding the Logo, and shall promptly notify the Communications Officer of any use or suspected use of the Logo by a third party.

The use of the Logo, Coat of Arms, City Images and Brand is restricted to corporate activities, and City Images shall not be modified, copied, distributed, reproduced, published, licensed, transferred, in whole or in part, without the written consent of Designated Staff. Use of the Logo, Coat of Arms, and City Image, without the express prior written consent of Designated Staff is a violation of the City's intellectual property rights, and the City of Langley will protect such right to the fullest extent of the law.

References

| Policy Number: | CO-64 |
|-----------------------|---|
| Policy Owner: | Communications Officer, Administration Department |
| Endorsed by: | Senior Management Team |
| Final Approval: | Council |
| Date Approved: | November 4, 2019 |
| Revision Date: | |
| Amendments: | |
| Related Policies: | |
| Related Publications: | Graphic Standards Guide |
| | Logo Use Guide |
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