Sioux City Art Center
Code of Ethics
(Formally approved August 4, 2005, by the Art Center Board of Trustees
and October 12, 2005, by the Art Center Association's Board of Directors)

Introduction

Museums in the United States are grounded in a tradition of service and stewardship. They are organized as public trusts, holding their collections and using their resources to benefit those they were established to serve. The members of museums' governing authorities, their staffs, and volunteers are committed to the interests of these beneficiaries and are accountable for the care and proper management of collections, as well as the content, nature and quality of their scholarship, exhibitions and programs.

As non-profit institutions, museums comply with applicable local, state and federal laws and international conventions, as well as with specific legal standards governing trust responsibilities. In addition, as part of the City of Sioux City, the Art Center adheres to the City of Sioux City's policies and regulations.

<u>But museums and those responsible for them must do more than simply avoid legal liability; they must take affirmative steps to maintain their integrity and to insure that they act not only legally but also ethically.</u>

The Art Center's collections, programs and facilities are a public trust. This must always be recognized by all persons associated with the Art Center, but primarily by persons having important responsibilities in formulating or administering policies and procedures governing the Art Center. Persons holding such responsibilities have a duty and obligation to preserve and protect this public trust. It is understood that such duty may entail the voluntary surrender of certain rights to personal privacy and economic activity; it is the goal of this Code of Ethics to preserve the public trust with the least possible sacrifice of personal rights. Those individuals affected in varying degrees are the Trustees, Directors, employees of the Art Center, volunteers and others who may serve on various committees or otherwise be associated in an official capacity with the Art Center from time to time.

Definition of Terms

Administration: authority of the Sioux City Art Center
Art Center: Sioux City Art Center, a partnership of the City of Sioux City's Sioux City Art Center and the private, non-profit Art Center Association of Sioux City.
Art Center Association of Sioux City: private, non-profit "friends" organization supporting Art Center's exhibitions and programs
Collections: the permanent collections (two- and three-dimensional artwork) owned by the Art Center
Collections Committee: standing committee consisting of representatives of the Directors and the Trustees and the professional community at large which oversees the Collections
Committee on Ethical and Professional Practices: standing committee consisting of representatives of the Directors and the Trustees and the professional community at large which oversees compliance to the Code of Ethics
Directors: the advisory board of the Art Center Association of Sioux City, elected by the membership and consisting of up to 30 members
Gift Shop: the Atrium Gift Gallery, retail outlet for the Art Center

Gift Shop Committee: advisory committee with representatives of the Directors and Trustees and community professionals at large
Officials: Directors, Trustees and staff of the Sioux City Art Center
Program Committee: advisory exhibition and educational programming committee with representatives from the Directors and Trustees and the professional community at large
Staff: employees of the Sioux City Art Center
Trustees: the governing board of the Art Center's City-funded operating budget, appointed by and answerable to the City Council of the City of Sioux City, consisting of seven (7) members.

General Principles

All persons associated with the Art Center are entitled to engage in the full range of personal and professional activities of their choice, limited by the restraints imposed in these Code of Ethics and the following principles:

1. They shall fully and conscientiously fulfill the duties of their positions in the Art Center;
2. They shall avoid conflicts of interest;
3. They shall not misuse the Art Center's name, reputations, property, or services, nor shall they compromise its good will in the community.

I. Collections

A. Management, Maintenance, Conservation

The obligation of the Art Center to its collections is paramount. The Art Center derives its central purpose and its use to the general public from its collections, which are an essential part of a cultural fabric shared by our city, state and nation.

An ethical duty of the Art Center is to transfer to posterity when possible in enhanced form the material record of human culture. The Trustees and the Directors, the latter to the extent of its responsibility**,** must be in control of the collections, monitoring the location and the condition of the objects held.

Each object is an integral part of an historical and cultural composite, including a body of information about the object that establishes its proper place and importance and without which the value of the object is diminished. The maintenance of this information in orderly and retrievable form, its public availability, and the educational programs whereby the public may understand the collections are critical concerns of those charged with collections management.

Procedures must be established for the periodic evaluation of the condition of the collections and for their general and specific maintenance in keeping with professionally accepted standards.

B. Acquisition and Disposal

In the area of acquisition and disposal of Art Center objects, the Art Center must weigh carefully the interests of the public for which it holds the collections in trust, the donor's intent in the broadest sense, the interests of the scholarly and the cultural communities, and the Art Center's own financial well-being.

While the Directors and the Trustees bear legal responsibility for their respective collections, the curatorial and administrative staffs, together with their technical associates, are best qualified to assess the pertinence of an object to the collections or the Art Center's programs.

The Art Center has a Collections Policy (available to the public) regarding the acquisition and disposal of art objects. Objects collected by the Art Center should be relevant to the museum's mission and activities; be accompanied by a valid legal title (preferably unrestricted but, if not, with any limitations clearly described in an instrument of conveyance); and be properly catalogued, conserved, stored or exhibited**.** Acquisitions are subject to the approval procedures of the Director and the Collections Committee for ratification by the Directors and/or the Trustees as appropriate.

The Art Center will acquire or accept an object only when it can determine with reasonable certainty that the work has not been derived from illicit trade and that its acquisition does not contribute to the continuation of illicit trade in works of art.

As a general rule acceptance of an art object as a gift from an art dealer should be accompanied by documentation (signed by the director and stating the circumstances of the gift) for review by the Art Center's Collections Committee and for ratification by the Directors and/or Trustees as appropriate.

The Art Center must, in principle, remain free to improve its collections through selective disposal as well as acquisition. Works of art that no longer retain their physical integrity, that are not authentic, or that no longer meet mission and/or goals of the museum, in accordance with the Art Center's De-accession Policy and Procedures (see policy for details) may be de-accessioned from the collections.

The procedure for disposal shall be on the recommendation of the Art Center Director to the Collections Committee. Upon approval the recommendation is taken to the Directors for approval with final ratification by the Trustees. (See Art Center De-accession Policy and Procedures for details.)

When disposing of an object, the Directors and/ or Trustees, as appropriate, must determine the legal right to do so. Funds generated from the de-accessioning of objects must be used solely for acquisitions of new art for the Collections. When mandatory restrictions accompany the acquisition, they must be observed unless modified by an appropriate legal proceeding or the written consent of the interested parties.

No person associated with the Art Center or his/her representative may acquire any property from the Art Center for their personal account except in the normal course of business from the museum shop or other areas approved by the Administration. Objects, materials or supplies that the Art Center cannot sell and that must be discarded may be offered to a nonprofit organization.

C. Appraisals

1. Appraisal of Donated Art Objects

Staff and others involved in accepting gifts of art objects to the Art Center should be familiar with IRS Publication 526 dealing with the valuation of donated

property, especially as concerns the material relating to charitable gifts of art objects and the appraisal requirements as described in the instructions to IRS Form 8283.

The donor of an art object to the Art Center must secure his/her own appraisal at his/her own expense. The Art Center shall avoid any action that might appear to be an effort to assist the donor in securing an improper income tax deduction.

The Art Center cannot provide the donor with an appraisal for income tax or estate tax purposes. For internal record-keeping purposes, however, the Art Center should establish its own valuation.

2. Appraisal of Non-Institute Art Objects

The Directors, Trustees and staff are prohibited from appraising non-Art Center art objects.

D. Commercial Use

In arranging for the manufacture and sale of replicas, reproductions or other commercial items adapted from an object in the Collections, all aspects must be carried out in a manner that will neither discredit the integrity of the Art Center nor trivialize or damage the original object. All laws dealing with copyright rules and regulations will be strictly adhered in all maters of reproduction. With regard to the question of reproduction of works of art, awareness of the nature and relative importance of replicas and reproductions is a central issue. Therefore, great care must be taken to identify such objects for what they are in a manner that will be permanent and to ensure the accuracy and high quality of their manufacture.

E. Availability of Collections

Although the public must have reasonable access to the collections on a nondiscriminatory basis, the Art Center assumes as a primary responsibility the safeguarding of materials and therefore must regulate access to them. Nevertheless, the art collections should be made available to the general public within regularly maintained hours of operation that are published periodically. Some parts of the collections may be set aside for the active scholarly pursuits of staff members and scholars but normally only for the duration of the research effort.

Storage areas where reserve collections are maintained should be organized for the purposes of conservation and security but also categorized for easy access for research and study.

F. Truth in Presentation

It is the responsibility of staff to present the best current information about the works of art the Art Center displays. This forms a part of the primary charge of the Art Center to preserve significant materials unimpaired for the future. Therefore, intellectual honesty and objectivity in the presentation of objects is the duty of every museum professional.

II. Exhibitions

A. Obligations of Educational Program

An ethical duty of the Art Center is to provide the highest quality exhibition programs possible that enhance the understanding and appreciation of art and art history. Representatives of the Directors and the Trustees, through their advisory capacity as members of the Program Committee, must monitor and evaluate the exhibition program (See: Program Committee policies), while respecting the opinions of the professional staff.

B. Loans of Art Objects from the Private Collections of Directors or Trustees

While loans of objects from the private collections of Directors or Trustees or members of their families can be of benefit to the Art Center, it should be recognized that exhibition can enhance the value of the exhibited object and care should be used to achieve objectivity in such cases.

C. Exhibition of artworks created by Trustees, Directors and Staff

Directors, Trustees and staff who are artists must understand that while serving on either board or being employed by the Art Center the exhibition of their artworks or a close family member is a conflict of interest. The exceptions to this rule include the donation of artworks for fundraising events to benefit the Art Center, and participating in exhibition competitions judged by outside jurors

III. Education

A. Education program

An ethical duty of the Art Center is to provide the highest quality education programs possible that enhance the understanding of art and art history, while paying special attention to the Art Center's exhibitions and collections. The Directors and Trustees, through their advisory capacity as members of the Program Committee, must monitor and evaluate the education program (See: Program Committee policies), while respecting the opinions of the professional staff.

B. Employment of Trustees, Directors and Staff as Educators

While employment of Directors, Trustees or staff as educators, due to their skills, knowledge and credentials, may be beneficial to the goals of the education program, special care should be used to achieve objectivity in such cases to avoid conflict of interest.

IV. Gift Shop

A. **Gift Shop Merchandise and Evaluation**

An ethical duty of the Art Center is to offer merchandise in its Gift Shop that supports its mission, is educational and enhances the understanding of art and art history, while paying special attention to the Art Center's exhibitions and collections. The Art Center's Trustees and Directors, through their advisory capacity as members of the Gift Shop Committee, must monitor and evaluate the Gift Shop (See: Gift Shop Committee policies), while respecting the opinions of the professional staff.

B. Trustees, Directors and staff

While the consignment of merchandise by Trustees, Directors, or staff to the Gift Shop may be beneficial to the goals of the Gift Shop care should be used to achieve objectivity in such cases to avoid conflict of interest.

IV. Trustees, Directors, Staff, Contracted Labor and Volunteers

A. General Deportment, Responsibilities, Avoidance of Conflicts of Interest

1. Governing Boards: Trustees and Directors

The Directors and Trustees shall be loyal to the purposes of the Art Center. Each Director and Trustee must devote time and attention to the affairs of the Art Center to ensure that the Art Center and its governing boards act in accordance with the City policies and the governing instruments of the Art Center Association and with applicable state and federal laws.

A critical responsibility of the Directors and Trustees derives from their relationship to the Art Center Director, the Art Center's chief executive. The continuing surveillance of his/her professional activities is a primary responsibility that cannot be delegated and must be diligently and thoughtfully fulfilled.

All actions of the Directors and Trustees should be taken as a board, committee, or subcommittee, or otherwise in conformance with the bylaws or applicable policies of the Art Center Association of Sioux City and/or the City of Sioux City and the State of Iowa. The Directors and Trustees must work for the Art Center as a whole and not act solely as advocates for particular activities or subunits of the Art Center.

Each Director and Trustee should endeavor to conduct all of his/her activities, including those relating to persons or organizations closely associated with him/her, in such a way that no conflict will arise between those other interests and the policies, operations and interests of the Art Center.

Whenever a matter arises for action by the Directors or Trustees involving a conflict between the interests of the Art Center and an outside or personal interest of a Director or Trustee or that of a member of his/her family, that interest should be disclosed and made a matter of record. In those cases where the Directors or Trustees is present when a vote is taken in connection with such a question, he/she should disclose the interest and abstain from voting. There may be situations where the conflict is so grave that it cannot be resolved, in which case resignation may be appropriate.

A Director or Trustee having personal questions on any Art Center-related issue and wishing to avoid a conflict of interest may file with the Committee on Ethical and Professional Practices a statement disclosing his/her personal, business or organizational interests and affiliations and those of members of his/her family and all other circumstances and facts that may give rise to a conflict of interest**.** The Committee will advise the individual of instances where a conflict of interest exists.

(For conflicts of interest by members of the Directors and Trustees, see IIB Exhibition, and IIC Education.)

The Directors and Trustees together hold the ultimate fiduciary responsibility for the Art Center and for the protection and nurturing of its various assets: the collections and related documentation, the building and grounds, financial assets,

and staff. The Art Center has an obligation to develop and define its purposes and policies and to ensure that its assets are properly and effectively used for public purposes. The governing boards should provide adequate legal protection for all Art Center officials, including themselves, staff and volunteers, so that no one will incur inequitable financial sacrifice or legal liabilities arising from the performance of duties for the Art Center.

2. The Art Center Director and the Directors and the Trustees

The Art Center Director reports to and is accountable to the Trustees as the governing body of the Art Center. Since Art Center Association of Sioux City matters and City of Sioux City responsibilities are closely meshed, the Art Center Director should report to both bodies at agreed-upon intervals and upon request or need. While the Trustees serve at the pleasure of the City Council of the City of Sioux City and the Directors serve at the pleasure of the Board of Directors of the Art Center Association of Sioux City, they both must carry out the public trust responsibilities in the same manner as the Art Center Director.

Whenever a matter arises for action involving a conflict between the interests of the Art Center and an outside or personal interest of the Trustees or the Directors or that of a member of their respective families, their actions should be guided by the same rules.

3. Governing Boards and Staff

a. Communication

Governing boards communicate with staff though the Art Center Director. The Trustees and the Directors should not give administrative directives to Staff, not solicit administrative information unless such action is in accord with established procedures of the Directors and/or Trustees and the Art Center Director. Staff should communicate with the Boards through the Art Center Director or with the consent of the Art Center Director's full knowledge**.**

b. Staff Assistance

The Directors and Trustees may not seek staff assistance for personal need except as would be available to a member of the general public with similar needs.

4. The Staff

a. Responsibilities

Employment by the Art Center is a public trust and involves great responsibility. In all activities Art Center employees must act with integrity and in accordance with stringent ethical principles as well as with the high standard of objectivity.

Every Art Center employee is entitled to engage in the full range of professional and personal activities with a measure of personal independence equal to that granted comparable professionals in other disciplines and consistent with his/her professional and staff responsibilities**.** Loyalty to the Art Center must be paramount, since museums enjoy high public visibility and their employees a generous measure of public esteem. To the public, Art Center employees are never wholly separate from their institution. Any Art Center-related action by employees may reflect on the Art Center or be attributed to it. Employees can never consider themselves or their activities wholly independent of the Art Center despite disclaimers that may be offered. They must be concerned not only with their own, true personal motivations and interests as they see them but also with the way in which such actions might be construed by the outside observer.

b. Conflicts of Interest

Art Center employees should never abuse their official positions or their contacts within the museum community, impair in any way the performance of their official duties, compete with the institution, or bring discredit or embarrassment to the Art Center or to the profession in any activity, museum-related or not. They should be prepared to accept as conditions of employment the restrictions that are necessary to maintain public confidence in the Art Center's goals and in the museum profession; they are therefore expected to agree in writing to act in conformity with these Code of Ethics.

No staff member should use in his/her home or for any other personal purpose any object or item that is part of the Collections or under the guardianship of the museum, or use any other property, supplies, or resources of the Art Center except for the official business of the Art Center and as approved by the Art Center Director.

The reputation and name of the Art Center are valuable assets and should not be exploited either for personal advantage or the advantage of any other person or entity. Information about the administrative and non-scholarly activities of the Art Center that an employee may acquire in the course of his/her duties, and which is not generally known or available to the public, must be treated as information proprietary to the Art Center. Such information should not be used for personal advantage or for purposes detrimental to the Art Center. No person associated with the Art Center may use confidential information (e.g., information about ownership of works of art) acquired through his/her position in any outside employment or activity (see Collections Policy) without the express prior consent of the Art Center Director.

Staff members should be circumspect in referring members of the public to outside suppliers of services, such as appraisers, conservators, or framers. Whenever possible, more than a single qualified source should be provided so that no appearance of personal favoritism in referrals is created.

Whenever a matter arises that could be perceived as a conflict between the interests of the Art Center and an outside or personal interest of an employee or an employee's family, the employee should bring the matter to the attention of his/her supervisor for resolution.

c. Outside Employment, Consulting, Teaching, Lecturing, Writing

Art Center professional staff may engage in outside employment or gainful activities only under the following guidelines:

1. In the case of employment of a professional nature, the Art Center Director must give prior consent in writing;

2. Outside employment for compensation shall not be undertaken while traveling at Art Center expense unless previous arrangement have been made to donate such compensation to the Art Center and prior approval has been granted by the Art Center Director or Chair of the Trustees;

3. Such activities must not lessen the ability of staff to perform their duties and responsibilities in an acceptable manner;

4. Activities for which staff members are paid shall be performed on their own time outside of regular museum working hours and off site;

Staff members shall not be required to disclose non-Art-Center-related activities on behalf of voluntary community groups or other public service organizations but shall conduct themselves so that their activities on behalf of such organizations do not reflect adversely on the reputation or integrity of the Art Center.

5. Volunteers

Volunteer participation within the Art Center is a strong and vital tradition, and the Art Center's programs could not continue without the contributions and personal involvement of devoted volunteers. The staff should be supportive of volunteers, receive them as fellow workers, and willingly provide appropriate training and opportunity for their intellectual enrichment. While volunteers participate in most Art Center activities, those with access to the Collections, programs, and associated, privileged information work in areas that are sensitive.

Access to the Art Center's internal activities and information is an honor, and the lack of material compensation for effort expended on behalf of the Art Center in no way frees the volunteer from adherence to standards that apply to paid staff. The volunteer must work toward the betterment of the Art Center and not for personal gain other than the gratification and knowledge to be derived from Art Center participation.

Although the Art Center may accord them stated special privileges, volunteers should not accept gifts, favors, discounts, loans, or other dispensations of things

of value that accrue to them from outside parties in connection with carrying out duties for the Art Center. Conflict of interest restrictions placed upon the staff must be explained to volunteers and, where relevant, observed by them.

Volunteer organizations should understand clearly the policies and programs adopted by the Art Center and must adhere to the administrative application of such policies and programs. Volunteers must hold confidential matter of program function and administration that are not generally known or available to the public.

B. Personal Collecting

Personal art collecting is encouraged subject to the following guidelines for persons having significant responsibility for acquiring art objects for the Art Center (i.e., Trustees, the Directors, the Art Center Director, and staff, hereinafter collectively called "Officials".):

1. Officials shall not become involved in any transactions that by virtue of their office give rise to a conflict of interest;

2. Officials shall not buy from, sell to, or trade works of art with the Art Center except where the specific transaction is approved in advance in writing by the joint Committee on Ethics and Professional Practices;

3. Where a conflict of interest with the Art Center may be involved, Officials shall make available to the Committee on Ethical and Professional Practices, within 90 days of the date of occurrence, full details of all significant purchases, trades, and gifts or sales of art objects.

To aid in the administration of these Code of Ethics, the Art Center shall have the option to purchase from an Official at his/her cost, including related expenses, any art object such Official has acquired under circumstances that involve a known conflict of interest. The option to purchase shall be exercised by the Art Center within 90 days of disclosure by the Official to the joint Committee on Ethical and Professional Practices of the facts involved, whether by voluntary action of the Official or by action of the Committee, which request all pertinent details for its consideration. The right of the Art Center to acquire from an Official shall not extend to art objects collected prior to the date he/she became an Art Center Official.

While it is expected that the foregoing and other requirements of these Code of Ethics will be effective in minimizing or eliminating conflicts of interest, it is suggested that where serious doubt exists as to the presence of a conflict, the Official should present full details orally or by written submission to the joint Committee on Ethics and Professional Practices for a determination prior to proceeding with the contemplated transaction.

C. Art Dealing

No Official (as defined in IIB above) shall act as an art dealer. Upgrading a personal collection by occasional trades or purchases is not considered dealing in works of art. The acquisition and deletion of objects from a personal collection may require disclosure as set forth in this Code of Ethics (see IIB).

While the sale of art objects from an exhibition is allowed, the Art Center must never take this into consideration in determining the selection of artworks to be exhibited. While the Art Center will provide visitors with the price of an artwork which is included in an exhibition when requested, the Art Center does not allow prices to be included on labels or in galleries except as part of a fundraising event by the Art Center Association of Sioux City or on artworks consigned to the gift shop and featured in the shop or as part of a gift shop exhibition in the Gardner Conference Room. Gift shop exhibitions, while not a part of the regular exhibition program, must be selected to avoid a conflict of interest or even the appearance of a conflict of interest.

D. Personal Gifts

By law all personal gifts to Trustees and staff from artists, dealers and suppliers with whom the Art Center has transactions shall be limited to nominal value of $3.00. Gifts of art to the above are treated as gifts to the Art Center and may be accessioned into the permanent collection by the Art Center Director's nomination and subsequent approval first by the Collections Committee, and then by the Association Board. While not by law, gifts to Directors should also be treated in a similar manner.

V. General Policies

A. Professionalism

Members of the Art Center's administration and its governing entities should respect the professional expertise of staff members, who are engaged because of their special knowledge or ability in some aspect of museum activity. Art Center governance should be structured so that the resolution of issues involving professional matters incorporates the opinions and professional judgments of relevant members of the museum staff. Responsibility for the final decisions will normally rest with the Art Center's administration.

B. Personnel Practices and Equal Opportunity

In all matters relating to staffing practices, the standard should be ability in the relevant discipline. In these matters, as well as in the Directors/Trustees selection, management practices, volunteer opportunity, collections usage, and relationship with the public at large, decisions must not be made on the basis of discriminatory factors such as race, color, creed, sex, age, handicap, or personal orientation.

C. Interpersonal Relationships

Professional museum workers must always be dedicated to the high standards and discipline of their profession, but they must also remain mindful that they are employees as well as independent experts. While they must strive for professional excellence in their own specialty, they must at the same time remember that they are part of a team effort and must cooperate supportively with their colleagues.

D. Inter-institutional Cooperation

The Art Center, in its goal of contributing to the preservation of humanity's cultural heritage and the increase of knowledge, should respond positively to opportunities for cooperative action with museums and other institutions nationally and internationally to further these goals.

E. Ownership of Scholarly Material

Staff members are encouraged to write and publish both for the Art Center and on their own. Ownership of copyright rests with the Art Center on all material prepared as 1) part of the normal duties of the staff member; or 2) specially contracted, unless exceptional arrangement is made prior to publication. Ownership of copyright for works done on the staff member's own time remains his/her possession, but such work must satisfy the outside employment guideline (see IID above).

F. Use of Museum Property and Services

No person may use the Art Center's collections, facilities, personnel, or services in any non-Art Center matter or context without the express prior consent of the Art Center Director.

G. Personal Property

All personal property brought by and used by Official at the Art Center must be registered in order to avoid the issue of ownership and the right of the Official to remove the property at a future date.

VI. Donors

Those individuals, families and organizations that provide voluntary philanthropic gifts and grants in fulfillment of the mission, goals and future plans of the Art Center must be assured of the confidence in the management productivity of their expected commitments. To these ends the Art Center is committed to:

1. informing donors of the organization's mission, of the way it intends to use the donated resources, and of its capacity to use donations effectively for their intended purposes;
2. informing donors of the identity of those serving on the organization's governing boards, and to expect that the board exercise prudent judgment in its stewardship responsibilities;
3. providing donors access to the organization's most recent financial statements;
4. honoring donors with appropriate acknowledgement and recognition;
5. reassuring donors that information about their donations is handled with respect and confidentiality to the extent provided by law.

VII. Establishment of Committee on Professional Practices

There is herewith established a committee to be known as the Committee on Ethical and Professional Practices of the Art Center.

A. Members

C. Operation

The Committee shall establish in writing its own rules of procedure, including provision for an adequate record of all meetings and actions of the Committee, copies of which shall be furnished to the members of the Committee and shall be available in the office of the Art Center Director.

D. Duties

The Committee shall review material and reports submitted on acquisitions, sales, gifts, trades, personal collecting, and the other matters within its jurisdiction. Upon its own motion or upon receipt orally or in writing of specific problems or requests, the Committee shall convene to review the matters and, where appropriate, issue written recommendations to the City Council or the Directors as appropriate**.**

Material filed with or submitted to the Committee will constitute a part of the file of Art Center. The Committee may grant confidential treatment of submitted material to the extent appropriate to aid in the proper discharge of its functions and in consonance with law and the public interest.

The Committee shall transmit a report of its activities to both the City Council and Art Center Association Directors promptly after June 30 of each year or more frequently upon the written request of either entity.