

Policy: Operational - Confidentiality & the Protection of Privacy

Department: Library

Effective Date: August 2014

Review Date: November 2020

Next Year of Review: 2022

Introduction

The Bruce County Public Library adheres to its legal responsibility to protect the rights of the Library's members to privacy. In order to achieve the mission of the Library, and to encourage the uninhibited use of the Library's services, library members must be confident that the personal information they entrust to the Library remains confidential.

The Bruce County Public Library abides by the provisions of the Public Libraries Act, R.S.O. 1990, Chapter P. 44 and the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), R.S.O. 1990, Chapter M.56.

The Library's confidential patron information includes, but is not limited to:

- All records identifying the names, addresses, contact information, or identification and PIN numbers of library members
- All records identifying the materials borrowed by any library member
- All outstanding financial account balances
- All inter-library loan transactions
- All reserves placed, caught or held
- All items photocopied for library users
- All items faxed to and for library users
- All suggestions for purchase of library materials submitted by library users
- All databases and other files or materials consulted by, or on behalf of, library users
- All customer comments submitted by library users
- All program registration information

Information Collected

BCPL collects the following information when registering a new user:

- Name
- Address
- Telephone number

- Name of guardian (in the case of minor children under 14 years of age)
- email (optional)
- Date of birth (optional)
- Anonymous statistical information

Reason for Collecting Information

Personal information is collected and used by internal staff for the purpose of providing library services including, but not limited to, the following:

- Access to library materials and services
- Program registration
- Computer use and bookings
- Automated telephone system
- eNewsletters and marketing of library resources and services
- Electronic Communications - email alerts for holds, fines, fees or outstanding library materials
- Library fund development
- Non -identifying statistical purposes
- Fraud prevention or abuse of library services

Information will only be used for the purpose for which it was collected and will not be disclosed except with consent of the individual or as required by law.

Consent

Consent to collect personal information is provided by any one of the following scenarios:

- Verbally by the patron at the time of registration.
- Patron accepting and signing a BCPL card.
- Patron completing and submitting an application form.
- Patron completing and submitting an electronic form through the website.

Individuals may choose to not provide all requested information. However, this may result in the Library not being able to provide the individual with all available services.

Parents or legal guardian must be available to give consent for a child under the age of 14 to access library services.

Disclosure of Personal Information

BCPL has a responsibility to respect the privacy of individuals and the confidential nature of personal information. Staff may view and amend patron information as required to perform appropriate library functions. Staff are not permitted to view or amend records outside the scope of their duties. Personal Information may be provided to law enforcement officers by the Director or designate. Other Library staff are not permitted to release personal information.

Personal information may only be disclosed if:

- A subpoena or court order is presented, or an active law enforcement investigation is underway.
- An active child in need of protection investigation is being conducted by the Children's Aid Society.
- An adult patron gives written consent.
- A legal guardian for minor children (under the age of 16) gives written consent.
- Information is required to ensure the safety of Library staff, the general public, to protect the Library property, or to enforce Library policy.
- In accordance with section 32 of MFIPPA.

Parents and legal guardians may request access to library records for children under the age of 16. Access to records may be provided after the identity of the parent/guardian is confirmed and the age of the child is established.

Staff who are registered as patrons of the library have the same privacy and confidentiality rights as members of the public.

Accuracy

BCPL updates patron information every two years. Patrons may change their personal information at any time, by visiting any branch location or by electronically accessing their account through the BCPL online catalogue. Photo identification with a current address is required to verify patron records.

Retention of Information

Personal information is collected voluntarily and stored electronically in a central secured database. Personal information is used to create a borrower record. Borrower records allow the library to assign resources and services to an individual.

Resource and service transactions remain on the database:

- As long as circulation records indicate an item remains on loan.
- As long as fees or fines associated with library materials or services remain unpaid.
- As a historical record of items lost, material fees and fines remain attached to all borrower records.
- To provide a circulation record and to assist library staff with the selection of materials for patrons unable to independently attend the library.

Disposal

Paper records no longer needed to conduct library business are shredded prior to disposal.

Exception

If customers do not return items on time, or owe the library money in fines, lost or overdue items, etc., the Bruce County Public Library reserves the right to provide such information to other libraries, a collection agency or to take legal action if warranted. Nothing in this policy prevents the appropriate library staff from using library members' information in order to conduct the legitimate business of the Library. This includes, but is not restricted to, the circulation of materials, the collection of outstanding financial accounts, and issues related to the temporary or permanent banning of patrons.