



Privacy Policy

Policy Number: 16-05

Policy Approval Date: January 11, 2016

Policy Review Date: December 2019

DEFINITIONS

Access Request is a formal request for access to records made under the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).

Delegate refers to the individual appointed by the CEO/Chief Librarian to make recommendation for release of information in his/her absence.

The CEO/Chief Librarian is the **Freedom of Information/Privacy Officer** for Huntsville Public Library.

HPL or **Library** means the Huntsville Public Library or, if the context so requires, any premises used by the Huntsville Public Library for Library purposes.

PURPOSE

All visitors to Huntsville Public Library have the right to privacy and confidentiality regarding their use of Huntsville Public Library's services, collections and virtual content, and regarding the collection of personal information by Huntsville Public Library.

Personal information is defined by Huntsville Public Library as recorded information about an identifiable individual. The personal information is given voluntarily by Library users either in person, in writing or electronically. This privacy statement covers all three circumstances.

To ensure that the Huntsville Public Library Board is in compliance with the Municipal Freedom of Information and Protection of Privacy Act 1990, and that the Library adheres to the principles outlined in the Canadian Standards Association Model Code for the Protection of Personal Information. They are:

Accountability

The Library will clearly state who is to be contacted whenever a user questions the use of personal information. The Library will ensure that its privacy policy is enforced by all Library staff members as well as any third party organizations or agencies that may have legitimate access to such information in support of the Library's business.

Identifying Purpose

The Library will clearly state the purpose for collecting any personal information before such information is collected. Consent must be obtained before the information can be used in any new way, except where such use is required by law.

Consent

Any individual may choose not to allow the collection of such information, although such an action may affect a person's ability to use the affected Library services.

Limiting Collection

Information shall be collected using only legal and lawful means and use shall be limited to that which is necessary for the purposes identified by the Library.

Use, Disclosure and Retention

Personal information shall not be used or disclosed for purposes other than that for which it was collected, except with the consent of the individual or as required by law. If access to information is required for the purpose of a law enforcement investigation, the requesting Officer must complete the Disclosure of Personal Information Form and forward it to the CEO/Chief Librarian. The CEO/Chief Librarian will provide the recording for the specified date and time of the incident requested by the Law Enforcement Officer, subject to MFIPPA exemptions.

Personal addresses and phone numbers that are collected by the Huntsville Public Library will not be given or sold to other organizations and will only be used for Library-only mailings that are approved by the Board. Information may be shared with agencies or companies working within the scope of their duties on behalf of the Library. The Library shall ensure that such agencies or companies abide by the Library's policy. Personal information shall be retained only for the period of time required to fulfill the purposes for which it was collected.

Accuracy

Under the terms of the legislation, we will commit to an annual review to ensure that the collection, storage and disposal of the information is carried out in a manner that conforms to the Municipal Freedom of Information and Protection of Privacy Act 1990. Personal information shall be as accurate, complete and as up-to-date as is necessary to fulfill the purpose for which it is collected. Individuals may challenge the accuracy of their personal information.

Safeguards

Personal information shall be protected by safeguards that are appropriate for the sensitivity of the information collected.

Openness

The Library shall answer any individual's questions about the uses of specific information and about specific practices, ensuring that practices abide by this policy.

Access

The Library shall allow users to see personal information about themselves. Library staff must provide loan information about a child less than 16 years of age to that child's parent or guardian. Library staff must also honour court orders issued by a judge that require the release of personal information. With approval of the CEO/ Chief Librarian or delegate, Library staff may also disclose personal information in compassionate circumstances, to facilitate contact with the next of kin or a friend of an individual who is injured, ill or deceased. Any disclosures to law enforcement officials or to assist in compassionate circumstances must be reported to the Library Board, without identifying the individual concerned.

Challenging Compliance

Any Library users who feel their privacy has not been protected may challenge Library practices through the CEO/Chief Librarian. A Library user who, after such a challenge, is not satisfied with the result, may appeal to the Library Board, maintaining either that the current policy has been violated or that the current policy needs to be changed in order to address a perceived issue.

WHAT WE COLLECT AND WHY

The staff of the Huntsville Public Library collects the following information about individual Library users.

1. The Library collects the name, address, and telephone number of each registered Library user. Such information is used by staff and by agencies and companies working within the scope of their duties on behalf of the Library. Such information can be used in the provision of Library services.
2. The Library may collect an email address which is used to provide a user with electronic notification about their borrowed and requested library materials. The email address is also used for the purpose of circulating an electronic newsletter for users who subscribe to one or any other purpose approved by the user.
3. The Library collects information about what an individual Library *user* may have borrowed from the Library. Information about what an individual Library *user* may have borrowed is not shared with anyone. Possession of a Library card is considered consent by the person to share such information with the person holding the Library card. *Users* may designate family members or others to check out material for them, using their card. Information about what a person may have borrowed is not retained when the item is returned except where fines and fees may have occurred or where the person is registered for the Visiting Library Service.

4. The Library collects information about items placed on Hold to be borrowed by an individual Library user. Information about what an individual Library user places on Hold is not shared with any member of the public. An individual user may designate others to know what has been placed on Hold for him or her so that these specific people may pick up their Holds. Without such a designation, Holds may only be checked out by the person who has the Library card of the individual placing such a Hold.
5. The Library collects information about users who submit purchase recommendations via the OPAC, conversations with Library Staff, and email or print forms. The personal information on these forms is used to place holds on requested materials. The Library retains the forms for the purpose of improving internal ordering processes after which the forms are destroyed.
6. The Library collects information about public meeting room space that a specific individual may rent and programs that people may have registered to attend. Information about what an individual Library user rents or registers to attend is not shared with any member of the public.
7. The Library collects information about when an individual may have booked a public use computer as well as how that computer has been used. All history or cache files which might identify how a person has used a Library public access computer are erased once the computer is rebooted at the end of a session. The Library's goal is to ensure that all such information is erased at the end of the day upon which a computer is used.

Upon complaint, the Library may review the use of a particular computer to ensure that the Library's Technology @ HPL is being upheld. Such a complaint must be lodged on the day of the alleged abuse so that an investigation may occur.

8. The provincial Interlibrary Loan (ILLO) process is managed by software used by all provincial libraries that participate in the Interlibrary Loan Program. The name and phone number of any person requesting material through ILLO is stored on servers not controlled by HPL. While there are safeguards in the software to ensure that personal information is protected, HPL cannot control or monitor the use of this information.
9. The Library collects Comment Emails, letters from individual users and Requests for Reconsideration from individual users (A Request for Reconsideration is a request that an item held in the Library's collection be removed. Suggestion and Comment forms, Ask the CEO/Chief Librarian emails and User Feedback emails are used internally to improve services. Lead Team review the emails received and on occasion this information may be reviewed by the Library Board. Information that would identify an individual is removed from public documents such as the Board package.

Request for Reconsideration that is appealed to the Library Board becomes part of the public record, including the name of the individual making such a request.

10. At times, Library staff collect personal information that may be required to assist in answering reference questions either in person, over the phone, or through email. The Library may collect personal information in order to assist a person but, once the question is complete, staff will keep no permanent records that link reference questions to a specific person.
11. The Library collects visual images through security cameras. Visual images may be used by Library staff to ensure the safety of staff and persons using the Library itself. Agencies or companies working within the scope of their duties on behalf of the Library may also use such images. Images are only used to ensure that Library behavioural policies are enforced or that the safety of the people whose images are collected is protected.
12. The Library may collect the names and contact information of individuals involved in disturbances, accidents or other incidents that take place on Library property. Personal information may be collected so that VPL can respond effectively to security and safety concerns and to breaches of HPL Code of Conduct. Personal information is not shared with other members of the public. In some cases, failure to provide a name and contact information may lead to expulsion from the library premises
13. The Library collects photos of Library users at Library events and programs. Photos of recognizable individuals taken by Library staff or for Library purposes will not be used without proper permission.
14. The Library may, on occasion, permit valid research within the Library. This may include the use of individual Library records. Any such research must be approved by the Library Board, which will apply the principles of the Canadian Standards Association Model Code for the Protection of Personal Information.

Any research that is conducted by an outside agency must be approved by an appropriate research ethics board. Whenever individual user information is used under the approved terms of a research agreement, personal information will be destroyed before the publication of any results.

Municipal Freedom of Information and Protection of Privacy Act

The Municipal Freedom of Information and Protection of Privacy Act protects the privacy of your personal information in the Library's records. It also gives you the right to ask about your own personal information in these records.

The Act includes rules on how the Library can collect, use and dispose of personal information in its records. The Library must follow the Act.

You have the right to ask us to correct your information if you can prove that it is incorrect.

The Library cannot give you information about another person, unless that person is under sixteen and you are his/her parent or legal guardian. You may also give permission for another person to see your information; but you must complete a special consent form.

If you bring a Library card; overdue notice or collection letter that belongs to another person, it implies consent for you to pick up material on hold for that person or pay that person's fines. It does not allow you to have access to other information in that person's record.

RELATED DOCUMENTS & INFORMATION

Canada's Anti-Spam Legislation

Canadian Standards Association Model Code for the Protection of Personal Information

Borrowing Policy

Code of Conduct Policy & Signage

Community Social Media Policy

Intellectual Freedom Policy

Interlibrary Loan Policy

Municipal Freedom of Information and Protection of Privacy Act

MFIPPA Access or Correction Request Form

Ontario Library Association

Planning for Success: Privacy Impact Assessment Guide – Information & Privacy Commission of Ontario, May 2015

Privacy Statement – Town of Huntsville – Virtual Library (www.huntsvilleLibrary.ca)

Public Libraries Act

Security & Video Surveillance Policy

Social Media Procedures

Staff Use of Technology Policy

Technology @ HPL Policy

Technology @ HPL Procedures

POLICY HISTORY

Amendment approved by the Huntsville Public Library Board January 11, 2016 | Motion 16-05

Privacy Policy approved by the Huntsville Public Library Board December 14, 2015 | Motion 15:112

Superseded Privacy Statement | Motion 12-33 | Revised & Adopted by the Huntsville Public Library Board April 16, 2012.

Superseded Privacy Statement | 11-32 | Revised & Adopted June 15, 2011

Privacy Statement | Adopted May 21, 2008