Policy Number: OP 01

Policy Title: Confidentiality of, Access to and Disclosure of Personal Information

Policy Status: Required under the Libraries Regulation pursuant to the Libraries Act and the Freedom of Information and Protection of Privacy Act as amended from time to time

Date Approved: August 8, 1977

Date Amended: February 2, 1987; October 15, 1992; May 9, 1994; September 14, 1998; September 13, 1999; June 10, 2002; June 18, 2007; December 17, 2007; March 21, 2011; June 16, 2014; December 16, 2019

Date for Review: 2024

Principle

All Strathcona County Library employees, volunteers, and Board Members shall hold in strict confidence any personal information held by the Library in accordance with the Alberta Libraries Act and Regulation and the Freedom of Information and Protection of Privacy Act as amended from time to time. See **Schedule A** for a list of personal information banks (PIBs) held by Strathcona County Library.

Information about Cardholders using Strathcona County Library

Records or transactions relating to any cardholder's use, borrowing, complaints, delinquent accounts, etc., will be held in confidence, but information may be shared with resource sharing libraries and collection agencies for the purposes of providing library services, collecting fines and retrieving borrowed materials. By signing a library card, cardholders are signing a contract with the Library acknowledging that their contact information may be made available for these purposes. This also applies to Alberta-Wide Borrowing (ME Libraries) patrons as they have signed at their local library.

Library employees and, on occasion, volunteers who work on behalf of the Library, shall have access to cardholders' files as required in order to carry out the business of the Library.

Upon request and presentation of a library card or identification, a cardholder will be given access to all information concerning him or her on file with the Library. Access to a cardholder's record is limited to that cardholder, and in the case of a minor under the age of 18years, to the minor and/or his or her parent(s) or legal guardian.

Employee and Volunteer Information

Records and information respecting employees are confidential, in accordance with the terms and conditions of the Freedom of Information and Protection of Privacy Act.

Upon request, employees or volunteers will be given access to all information concerning them on file with the Library in accordance with the Employee File Guideline.

Library Operations

Access to records and documents pertaining to the operations of the Strathcona County Library Board is provided to the public as set out in library legislation, except where personal information is concerned as set out in the Freedom of Information and Protection of Privacy Act and its regulations.

In order to shield personal information from coming under the jurisdiction of the United States Patriot Act, Library software acquired from foreign sources shall be examined for the possibility that it may report patron information to foreign agencies, and such capacity shall be disabled where possible. Where possible, the Library will give preference to vendors whose computer servers are resident in Canada. When the Library engages vendors or services where patrons' personal information could reside on servers not in Canada, patrons will have the choice of using the service or not, whenever possible. For example, when it is necessary to contract with vendors that provide Library patron program registration and that have computer servers in the United States, patrons will be informed and given the chance to opt out and to use alternative means of registration.

Security measures will be taken to ensure hard copy and digital personal information cannot be accessed by unauthorized persons.
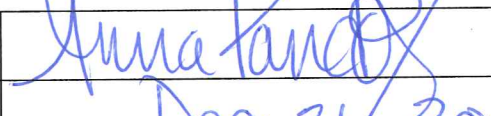
Exceptions

Records of employees, volunteers or Library patrons shall not be made available to any agency or provincial, federal, or local government except pursuant to such process, order, or subpoena as may be authorized under the authority of, and pursuant to federal, provincial, or local law relating to civil, criminal, or administrative discovery procedures or legislative investigatory powers.

Upon receipt of any process or subpoena, the person named and/or served shall immediately report to, and consult with the CEO, who will contact the Library Board Chair or designate and legal counsel of the Library to determine if such process, order or subpoena is proper and in full compliance with accepted legal authority. In the event the legal process fails to sufficiently identify or name in specific terms or specifications the records on file in respect to an identified employee, volunteer or Library patron, the request is considered to be defective and not binding

upon the Library and its personnel, except under further due process of law. Circulation and/or registration files will be released to someone other than the employee, volunteer or Library patron only when a written order to do so is received from the CEO.

Unless requested not to do so by the Library patron, volunteer or the employee, the Library may disclose personal information about a Library patron, volunteer or employee with respect to attendance at or participation in a public event or activity taking place at the Library, or the receipt of an honour or award bestowed by the Library Board.

An employee or volunteer who wishes to have personal information about himself or herself disclosed to a third party must make such a request for disclosure in writing to the CEO.

Approved by Board Chair	*Anna Panco*
Date	Dec. 31/2019

Schedule A

Personal Information Banks (PIBs)

Strathcona County Library maintains and houses the following banks of personal information at the Library (401 Festival Lane, Sherwood Park, Alberta), under the legal authority of the Freedom of Information and Protection of Privacy Act as amended from time to time.

1. Board member phone list of members of the public appointed to the Library Board by Strathcona County Council.
   - Information that may be contained: name, address, phone numbers, email addresses, number of years of service, offices held, and committees served on.
   - Date of birth is collected for the "Directors/Trustees and Like Officials Worksheet", a requirement for the Library's annual charitable return.
   - If the Board member accepts WCB coverage, birthdate is required.
   - If the Board member claims meeting compensation, a social insurance number is required for the purpose of issuing T4A forms.

2. Cardholder email notices and letters for/from Strathcona County Library cardholders and cardholders from other libraries regarding their circulation accounts.
   - Information that may be contained: patron name, address, barcode, computer identification number, status of material, charges, outstanding balance of materials and fees.

3. Cardholders' registration records on computer for Strathcona County Library cardholders and cardholders from other libraries; Bookmobile cardholder information on paper; registration information for The Alberta Library Cards.
   - Information that may be contained: name, address, postal code, phone numbers, birth date, identification, parent/guardian, alternate address, email address, personal identification number, guarantor, type of membership, day the card was last used, date record was last modified, expiry date of membership, the number of items checked out on the card, barcode number of card and of items borrowed from the Bookmobile on the day of registration, and access code for accessing the Internet.
   - Exceptions may apply under particular circumstances; e.g. spouses may waive FOIP so that the Library has permission to share some personal information between spouses.

4. Community Contacts.
   - Information that may be contained in Excel or Outlook: name, organization, address, email address, phone number.

5. Correspondence with patron contact information.
   - Information may include name, address, phone number, email address.

6. Daisy Collection Service registration forms for members of the public that qualify for print disabled services.
   - Information that may be contained: name, address, phone numbers, contact person, CNIB Registration Number.

7. Donor and prospective donor correspondence and contact lists.
   - Information that may be contained on paper or in Giftworks: name, address, phone numbers, email address, amount of donation, special requests, age.

8. Draw forms.
   - Information that may be contained: name, address, phone number, email addresses.

9. Email containing patron contact information.
   - Information may include: name, address, phone number, email address.

10. Employee time sheets, time entry detail, and time entry authorization reports.
    - Information that may be contained: name, employee number, salary, hours worked, and vacation, flex, and extra time accrued, sick time, family illness, medical appointments, special leave.

11. Friends of the Library member list.
    - Information that may be contained: name, address, phone numbers, and email address.

12. Grant Applications that include personal information e.g. STEP, CSJ, Young Canada Works.
    - Information may include: name, contact information.

13. Incident Reports for damage to personal property and health and safety incidents.
    - Information that may be contained: names, contact information, nature of injury or loss.

14. Individuals banned from the Library or persons of interest in behavioral incidents.
    - Information that may be contained: names, pictures, addresses, phone numbers, physical descriptions, activities and offences.

15. Interlibrary loan forms and database for Strathcona County Library cardholders and cardholders from other libraries that borrow library materials.
    - Information that may be contained: name, record number, address, phone numbers, email addresses, membership type, card number, and items requested.

16. Library contact information for current employees of the Library.

- Information that may be contained: name, address, phone numbers, and email addresses.

17. Notification of upcoming events.
    - Information that may be contained: name, address, phone numbers, and email addresses.

18. Outreach registration forms for members of the public requesting this special service.
    - Information that may be contained: name, address, phone numbers, email address, borrower's card number, name of emergency contact, phone number, their relationship to patron, and reading interests.

19. Patron comments: includes testimonials and complaints.
    - Information that may be contained: name, address, phone numbers, and email address.

20. Patrons who have signed up for Library programs using Engaged Patron software.
    - A third-party vendor stores the patron's name, email address, and program choices for six months before deleting them from the vendor server.

21. Patrons who have signed up for Resume Tutor services (held in an Excel spreadsheet.
    - Information may include name, phone number, email address.

22. Patrons who have signed up for one-on-one training (in Drupal for staff use).
    - Information may include name, phone number, email address.

23. Patrons who have signed up to receive Bookletters Newsletter.
    - A third-party vendor stores the patrons email address, then generates customized content to fit patron profile.

24. Patron Reviews of Library material (for local paper, summer reading games).
    - Information may include: name, contact information, title of books reviewed.

25. Patron emails to staff.
    - Information that may be contained: name, email address.

26. Personalized reading lists developed at the request of the patron.
    - Information that may be contained: name, address, phone number, email address, reading interests, and reading history.

27. Personnel files for past and present Library employees.
    - Information that may be contained: name, address, phone numbers, email addresses, resume, social insurance number, birth date, earnings, salary grid placement,

employment commencement date, emergency contact, benefit plans, vacation leave, sick leave, tax records, performance appraisals, correspondence, training certificates, criminal record checks, driver's transcripts, and other information to support administrative and payroll functions.

28. Presenters information.
   - Information that may include name, phone number, email addresses, GST number, certificate of incorporation.

29. Program participants' list/registration forms for members of the public that register for or attend Library programs or use Library services where registration is taken e.g. Resume Tutor.
   - Information that may be contained: name, phone numbers, email addresses, ages, or grade levels.

30. Promotional release forms.
   - Names of people who have given us their permission to use their names and pictures or to quote their comments about the Library in promotional materials or reports.

31. Patron emails requesting information and assistance sent to general information email accounts, including info@ and circinfo@.
   - Information that may be contained: name, phone numbers, addresses.
   - Notes: Contact information is recorded for detailed or difficult reference questions where it might be necessary to contact the patron when additional information is located.

32. Requests by patrons to purchase Library materials.
   - Information that may be contained: name, library card number, phone or emails when e-book purchases are requested. Patron requests on paper may contain name, phone number, email address, library card number.

33. Retired Library Board member list.
   - Information that may be contained: name, address, phone numbers, and email address.

34. Room booking forms (in Drupal for internal Library rooms).
   - Information that may be contained: name, phone numbers, email address, and purpose of meeting.

35. Submitted applications for employment and resumes.
   - Personal information requested on the Library application form (see attached). Additional information depends on what was submitted by the applicant on paper or

via email.

36. Surveys
   - Includes program outcome surveys. Information that may be contained: name address, phone number, and email address.
   - Note: Identifying information included in survey comments are removed from survey results.

37. Teen Advisory Committee member list
   - Information that may be contained: name and contact information

38. Vendors, (including individuals who are program presenters, resume tutor, and fundraising sponsors).
   - Information that may be contained: name, company name, address, phone, email, GST # if applicable.

39. Volunteer forms and schedules for individuals who have applied to volunteer on behalf of the Library.
   - Recorded on paper or electronically. Information that may be contained: name, address, phone numbers, email addresses, skills, and hours available for volunteering.

40. Tax Receipts for donation made to the Library.
   - Information may include: name, contact information, and amount of gift.