



Policy

Policy Record

Policy Number:	OP 01
Policy Title:	Confidentiality, Protection, and Disclosure of Personal Information Policy
Policy Status:	Required under the Libraries Regulation pursuant to the Libraries Act and the Protection of Privacy Act (POPA) 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; November 17, 2025
Date for Review:	2028

1. Policy Statement

- 1.1 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 Protection of Privacy Act (POPA) as amended from time to time.

2. Information about Cardholders using Strathcona County Library

- 2.1 Records or transactions relating to any cardholder's use, borrowing, complaints, delinquent accounts, etc., will be held in confidence, but information may be shared by the library 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. If cardholders choose to use Alberta-Wide Borrowing (ME Libraries), they are agreeing to also share the above information with other libraries.
- 2.2 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.

3. Employee and Volunteer Information

- 3.1 Records and information respecting employees are confidential, in accordance with the terms and conditions of the Protection of Privacy Act (POPA).

4. Disclosure of Personal Information Exceptions

- 4.1 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.
- 4.2 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.
- 4.3 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.
- 4.4 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.

5. Artificial Intelligence (AI)

- 5.1 In accordance with the POPA provisions, Strathcona County Library must notify individuals if they have any intention to input their personal information into an automated system to generate content or make decisions. This ensures patrons are informed and aware of how their personal information is being used to provide services and programs.


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6. Protection of Personal Information in Digital Form

- 6.1 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.
- 6.2 Security measures will be taken to ensure digital personal information cannot be accessed by unauthorized persons, as set out in the library's Information Security Policy (OP09), Cybersecurity Policy (OP10), and Cybersecurity Strategy (STR02).

7. Record Management

- 7.1 The library takes reasonable security arrangements using a combination of Administrative, Physical and Technical safeguards, to protect all forms of records and the privacy of personal information in the custody or under the control of the library as set out in its Records Retention Policy (OP04). This includes monitoring the continued integrity of the information in the records retention program and the data life cycles at any time for purposes other than its destruction. The library's records security arrangements are detailed in the Privacy Management Program Guideline.
- 7.2 Records held by Strathcona County Library are detailed in the Records Retention Guideline. A directory of the different types of personal information collected by the library can be found in the library's list of personal information banks (PIBs), which are part of the Privacy Management Program.

Approved by Board Chair	
Date	November 17, 2025