



Privacy Governance

Purpose

The Brantford Public Library is committed to protecting the privacy of the personal information given to us by individuals wishing to use library services. The authority to collect such information is authorized under the Ontario Public Libraries Act R.S.O 1990 P44.

Policy

What information is collected?

When registering a new library user the library requires;

Name, address, telephone#, Date of birth, and email (optional)

We record the name of parent/guardian in the case of library users who are 15 years of age and younger.

Proof of identification is required at the time of registration. Membership applications must be accompanied by 2 pieces of identification showing name and current address. None of the information from any personal identification provided is recorded or kept by the library.

Personal information which may include name, address, and telephone number is recorded when a person registers for library programs.

Why this information is collected?

Proof of residency is required at the time of registration. The above information is contained in your library account and is used for contacting members regarding holds, and overdue library materials, fines and fees. Date of Birth identifies patrons with similar/same names and allows us to update borrower records from 'child', to a 'high school', to 'adult'. Updating is necessary as certain materials restrict use based on age.

Personal information is collected when registering for programs in order that the library can contact registrants to remind them of the program or alert them if the program has been cancelled.

Borrower accounts are deleted from the database after 5 years of inactivity as long as there are no outstanding items and/or fees.

Information about the items you borrow is not kept once the material is returned to the library unless it is incomplete or damaged.

Consent

Separate consent is requested at the time of registration for the Brantford Public Library to use name, address, telephone number and email to contact members for library research, promotion, programming and development purposes.

In order to protect the privacy of each member only the cardholder will be allowed to use their card. Only parents/guardians may use the cards of those they are responsible for.

The library system collects photos of library users at library events and programs. Photos/video of recognizable individuals taken by library staff or for library purposes will not be used without prior permission.

Disposal

Once completed membership forms have been input and checked they are shredded.

Personal information that is recorded to register for a library program is destroyed by shredding following the event.

Online Privacy

Brantford Public Library Website

Web servers recording personal information regarding the use of the Brantford Public Library website are owned by Visible Media and are not housed at the Brantford Public Library.

The Library uses Google Analytics to track the use of the Brantford Public Library website. Data recorded and stored by Google Analytics includes:

- visitor's Internet Protocol (IP) address
- websites that direct the visitor to the Brantford Public Library website
- pages visited on the Brantford Public Library's website
- time and length of visit

Google's policy ensures that IP addresses and personal information collected are not accessible to their customers and is only used for non-identifying statistical purposes.

Customers using the Internet Public Access Catalogue (IPAC) to set holds and check their personal account must enter their library card number and Personal Identification Number (PIN) for verification. Customers using commercial databases through the Brantford Public Library website are required to enter their library card number to access the databases. The library card number is verified against the automated library system's patron database. A log of this verification remains on the database server for a short time and is automatically purged.

The Brantford Public Library does not use tracking "cookies." However, specific databases or websites available on the Library's website may employ tracking cookies.

Links to websites of other organizations are included on the Brantford Public Library's website. These links are provided for information only and are not subject to the privacy policy of the Brantford Public Library. Customers are urged to consult the privacy policies of the specific websites before providing any personal information.

Online Public Access Catalogues (OPACs)

The Brantford Public Library's OPACs provide access to the Library's Internet Public Access Catalogue (IPAC), databases and selected websites. The use of the Library's online catalogue does not require the provision of any personal information unless account access is required. Customers can access their personal library account with their library card number and PIN through the OPACs. Personal account information can include name, address, telephone, e-mail as well as items checked, on hold and fines/fees. Verification of the library card number and PIN is done through the automated library system's patron database. A log of this verification remains on the database server for a short time and is automatically purged.

OPACs are programmed to close after a short period to prevent access to personal information by other customers. However, it is advisable to logout when finished with the OPAC.

Use of databases on the OPAC does not require the provision of any personal information, although some do authenticate the customer against the library's patron database as described above. Database use counts are made remotely by database vendors without the retention of any personal identification. The Library accesses this information for statistical purposes.

Some websites available on the OPACs may require the provision of personal information. Customers are urged to consult the privacy policies of the specific websites before providing any personal information.

Computer Workstations

Customers wishing to use the Brantford Public Library's computer workstations must use the PC Reservation software package. This software records the library card number, workstation and time spent on the workstation. This data is stored in a log file which is purged every three months.

The Library uses a public web browser that automatically deletes any temporary files and records of websites visited when the browser is closed. The Library employs a URL filter that records every webpage visited in the Library and the time of the visit. The filter does not record any personal information.

Customers are cautioned that any personal files stored on the hard drive are not deleted when their computing session is closed. Messages in the software urge customers to delete these files or shut the computer off and restart it to remove these files.

All computer workstations are located in a public environment and the Library cannot guarantee privacy when using them. Any documents or images displayed on the workstations may be viewed by other members of the public.

Wireless Internet

The wireless network provided by the Brantford Public Library is an open, unsecured network and the Library cannot guarantee the security of the customer's computer while using it. This is clearly stated on the customer's computer during the log in process. The unique identifier of each computer accessing the wireless network as well as the time spent on the network are recorded and kept for two days on the wireless controller. For one week each quarter, statistics are recorded to determine the number of logins on the wireless network. No personal information is recorded for this survey.

Electronic Communication

Customers may use e-mail to contact library staff. This communication may include the e-mail address, name, postal address, library card number and specific reference request. This communication can only be accessed by authorized members of the library staff and will be stored in their mail account until deleted.

Polls or surveys may be featured on the Brantford Public Library webpage to gauge public opinion. No identifiable data will be collected and any information collected will be used to improve Library resources and services.

RFID Tags

Check-out - Staff assisted and Self-serve

All Brantford Public Library materials now contain RFID (radio frequency identification) tags to identify each item. Staff and self-serve check-out kiosks are RFID enabled allowing them to retrieve item information from RFID tags on all library material being borrowed. RFID tags contain only the barcode of library material. No information about individuals/borrowers is contained on this tag.

How to Access Personal Information

Informal Access Requests

All Brantford Public Library customers have the right to access their personal information as well as information regarding library operations. The request may be submitted on an informal or formal basis, depending on the nature of the request. Any requests are subject to the exemptions outlined in the MFIPPA. Customers must provide appropriate identification before personal information will be provided. Library staff may assist customers if required.

Formal Access Requests

Any formal requests for personal or operational information must be done in writing or through an Access to Information Form. The form is available at both branches of the Brantford Public Library and on the Library's website. Requests by written letter must include the following information:

- Full name and mailing address

- Daytime telephone number
- Detailed information regarding the requested records; including specific files, dates and other pertinent information

All formal requests must be delivered to the Brantford Public Library CEO who serves as the Freedom of Information Coordinator. The CEO will review each request and determine if the Library will release the requested information. Written notice by the CEO will be provided to the individual or group submitting any request.

The CEO/Freedom of Information Coordinator can be contacted at:

Rae-Lynne Aramburo
CEO/Chief Librarian
Brantford Public Library
173 Colborne Street
Brantford, Ontario
N3T 2G8
Telephone: 519-756-2220
Fax: 519-756-4979
E-mail: raramburo@brantfordlibrary.ca

Appealing Access Requests

Any decisions by the CEO regarding requests for information may be appealed to the Information and Privacy Commission. The Appeal Form and information on the appeal process are available on the Information and Privacy Commission's website www.ipc.on.ca

Correcting Personal Information

Customers have the right to request a correction of personal information if erroneous data is identified. The Library has a right to request supporting documentation from a customer when making any corrections.

Personal Information requested by Law Enforcement Agencies

In the case of the library being served by a search warrant the disclosure of personal information is mandatory. However, as stipulated in section 32 (g) of MFIPPA, the library will exercise its own discretion whether to release information to the police when requested to do so in order "to aid an investigation undertaken with a view to a law enforcement proceeding or from which a law enforcement proceeding is likely to result."

Privacy Audit

A privacy audit which looks at what personal information the library collects, how it is used, and who can access it is done on a regular basis.

Privacy Officer

The Privacy Officer of the Brantford Public Library is Rae-Lynne Aramburo, CEO

History

Supersedes: Not applicable

Background documents, related policies: Not applicable

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