



## POLICY

**Policy Type:** Library Services      **Policy Number:** 03-06-1  
**Policy Title:** Privacy

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### Policy:

The Library collects personal information of Library users under the authority of section 23(2) of the Public Libraries Act, R.S.O. 1990, c.P.44, and personal information will only be used to administer services and programs at St. Thomas Public Library. Personal information is collected directly from the customer (or parent/guardian), and Library employees take precautions to ensure the information is accurate and up-to date. The individual will be informed of the purpose for which personal information is being collected.

The Library is subject to the Municipal Freedom of Information and Protection of Privacy Act (R.S.O. 1990, Chapter M.56) that protects the privacy of personal information in the Library's records and ensures the right of access to information held by the Library.

To ensure that the St. Thomas Public Library Board is in compliance with the Municipal Freedom of Information and Protection of Privacy Act ("The Act"), the Library adheres to the principles outlined in the Canadian Standards Association Model Code for the Protection of Personal Information. These principles 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 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. Personal addresses and phone numbers that are collected by St. Thomas Public Library will not be given or sold to other organizations. 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:** 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 Chief Librarian/CEO, 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. As required by the Act, the annual statistics report on requests and disclosures will be completed for the Information and Privacy Commissioner of Ontario, and results will be reported to the Board.

**Challenging Compliance:** Any Library users who feel their privacy has not been protected may challenge Library practices through the Chief Librarian/CEO. 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.

St. Thomas Public Library does not host the Patron Database locally. It is hosted by a third party under contract with London Public Library. Every effort has been made to ensure that while data is outside of St. Thomas Public Library control it is nonetheless secured by any such third party contractor entrusted with same. These measures include physical security of the premises and Firewall and Authentication routines in place at the hosting site. St. Thomas Public Library makes no warranty and accepts no liability as to the actions of any third party named in this document.

St. Thomas Public Library will surrender no information unless required by law to do so, or if it becomes necessary within the framework of an action taken by the Library to enforce the Library's policies or protect its legal rights.

No attempt is made to gather personal information from Public Computer Workstations unless criminal activity is suspected. Usage numbers are gathered for statistical purposes only.

Information about material borrowed by customers is not kept in the customer record beyond the return of the item unless it becomes overdue or unless the customer has initiated the Reading History option. Overdue charges and outstanding material may remain on a customer account indefinitely. Once Library material is returned and checked in, a number is retained in a background file, which may be used to identify the last customer to use an item. This information is for use by authorized personnel only.

Personal information related to an individual is held for the duration of said individual's association with the Library and may be required to be updated periodically.

Details of information gathered related to an individual can be accessed by that individual by contacting the undersigned with proper identification. In responding to any request for access to Library records the requirements and procedures of "The Act" will be observed.

If you have concerns or questions regarding this policy please contact the undersigned:

Heather Robinson, CEO  
St. Thomas Public Library  
153 Curtis St.  
St. Thomas, ON N5P 3Z7  
519-631-6050  
hrobinson@stthomaspubliclibrary.ca

**Related Documents:**

Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. M56

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