

Policy No.: P01

Policy Title: Freedom of Information and Protection of Privacy

Date Originated: April 2019

Date Last Reviewed/Revised: October 2023

Point of Contact: Director of Support Services

1. POLICY STATEMENT

The Pickering Public Library is committed to providing both access to information and protection of privacy as outlined in the *Municipal Freedom of Information and Protection of Privacy Act R.S.O. 1990, c. M.56*, as amended and the *Public Libraries Act R.R.O 1990*. It is the policy of the Pickering Public Library to make information about the Library available to the public and protect the privacy of all individuals' personal information in its custody or control in keeping with the applicable legislation. Personal information collected about individuals is limited to that information necessary for the provision of services and the proper administration of the Library.

2. POLICY OBJECTIVES

1. General Privacy Principles

- 1.1. The Library will not sell, lease, or otherwise distribute or disclose your email address, postal address, phone number, or other personal information for non-library purposes to outside parties, except in circumstances detailed in this policy.
- 1.2. Photographs or videos of attendees may be taken at Library events. Signage will be in place at the event to communicate to attendees when this is happening. The Library may feature this content on our website or in other materials and this content may be retained as part of the Library's corporate archive. If you attend a Library event that includes photographs and video and do not wish your photograph to be used in Library materials please speak to a library staff member at the event.

- 1.3. The Library will use or display only a child's first name, last initial and age, to announce contest winners, or display any work submitted to the Library by a child.
- 1.4. The Library keeps copies of comments and suggestions with identifiable client information linked to it for a period of up to three years for service monitoring and improvements. If you are concerned about your privacy, you may submit written documents anonymously. If comments are used for publicity, the Library use only the first name and initial if available or seek the permission of the commenter to use their full name. Retention of comments made on the Library's social media platforms vary based on the rules of the particular platform.
- 1.5. The Library will release information to the Children's Aid Society, under the authority of the *Child and Family Services Act*, which states that a person who believes, on reasonable grounds, that a child under 16 is at risk of harm, must report this suspicion to the Children's Aid Society immediately, directly and on an ongoing basis.

2. Privacy and Your Library Account

- 2.1. All information related to your registration, including your birth date and the materials you borrow, are for internal library purposes only (to create and confirm your unique record, issue loans, etc.) The information is confidential except in the following circumstances:
 - Overdue and holds notification from the Library by telephone, email or mail to your home (title information may be included in mail and email).
 - Fees payment: a receipt including title information is given to the person paying.
 - Agencies collecting monies and materials owed to the Library.
 - Official police investigations.
 - Parental request for information regarding their child's account, provided the child is under 16 and the parent is able to provide proper identification.
 - The Library will disclose personal information concerning an individual to a third party who has been assigned supplementary card privileges, provided that the individual and the third party have indicated their agreement, and the agreement has been recorded in the patron record. This has been done to support the Books+ Express program where volunteers need to sign out resources on behalf of homebound clients.
- 2.2. The library catalogue provides access to your library records with your library card number and PIN number. In order that you may review your library activity, information is stored in your personal library account, which includes your name, email address, phone number, date of birth, fees owing, current checkouts, and

requests/holds information. An individual's borrowing history, personal lists of items and suggested purchases can be stored if a client chooses to do so. You are cautioned to protect this information on public or shared workstations by always signing out from your personal library account before leaving a workstation and by protecting your login information.

- 2.3. A person in possession of a library card is assumed to be the owner or have the owner's permission to use the card. Therefore, to protect your record, you should notify the Library immediately upon loss of your library card.
- 2.4. Staff access to information about items you borrow is not kept beyond the return of the item unless it is incomplete, damaged, or overdue. Outstanding items & fees remain on your record indefinitely even once paid, as do notes regarding any unresolved issues in your account.

3. Privacy When You Use a Library Computer Workstation

- 3.1. Library computer workstations provide access to some or all of the following resources: the catalogue, selected online resources, selected computer programs (such as MS Office suite software) and the internet.
- 3.2. The Library cannot guarantee your privacy when using library workstations. All library workstations are located in a public environment and any files that are displayed on monitors are subject to viewing by members of the public. Library clients are cautioned to be vigilant about displaying personal information.
- 3.3. Clients are urged to be cautious about displaying information that might be considered offensive or harassing in a public environment. See the Internet Use Policy for details. From time-to-time staff may view client workstations to ensure that the Internet Use Policy is being followed.
- 3.4. The privacy implications of using the library catalogue from a workstation are addressed in section 2 above.
- 3.5. When you use a Library workstation to access resources such as online magazines and newspapers, the Library will track the use of these products for statistical purposes only. The use is anonymous and not associated with a library client account in any manner.
- 3.6. When you use a Library workstation to access the internet, sites that you visit are kept in a memory cache on the workstation until you close the browser. You are cautioned to close your browser before leaving a workstation to ensure that any personal information (such as email and bank account information) is not left on the workstation.

4. Privacy When You Visit the Library in Person

- 4.1. Some Library locations have security cameras inside and outside the buildings. The images are kept for no more than one hundred and twenty (120) days. In order to ensure the safety and security of visitors and staff,

these images may be monitored or reviewed by library or city staff or for official police investigations. Please see the Video Surveillance Policy for further details.

- 4.2. The Library uses an RFID (Radio Frequency Identification) system for circulation and security. No personal information is stored on the RFID tags. The only information stored is the item identifying number and the current status of the item (checked in or checked out). General privacy of borrowing information is covered in section 2 above.
- 4.3. The Library provides public wireless Internet access at all of its locations. You are responsible for protecting your own hardware and software and for the transmission of personal information. The Internet Access Policy applies to all clients, whether connecting via wireless access or computers provided by the Library. See the Internet Use Policy for details.

5. Privacy When You Visit the Library Website from an External Location

- 5.1. When you visit the Library's website, the following information is collected, stored, and deleted from our files within one year:
 - The address (IP) of your computer or of your internet provider.
 - The date and time you access our site.
 - The internet address of the website which referred you to our site.
- 5.2. The Library will use this information to measure the number of visitors to the different sections of our site, and to help us make our site more useful to you. We do not make any links between website data and individual clients.
- 5.3. We may ask visitors to our site to provide their email address, postal address and/or telephone number only when needed to assist in answering inquiries or providing information and library services. Such personal information is confidential except if requested as part of an official police investigation.
- 5.4. If you contact the Library by email or fill-in forms available on the website, the information provided will only be seen by Library staff to respond to the request or comment.
- 5.5. The Library's website contains some resources that are restricted to library cardholders only. For these resources the library will request your library card number and PIN for the purposes of validation. The information about what was accessed is not retained beyond the end of the session.

6. Privacy and Third-Party Services

- 6.1. The Library website contains links to external sites not maintained by the Library. The Library is not responsible for your privacy when you disclose information to external websites: it is your responsibility to protect your personal information. Clients are encouraged to review the privacy policies of third-party services that they use. Third parties must either agree to adhere to strict confidentiality obligations in a way that is consistent with this Privacy

Policy and the agreements we enter into with them or we require them to post their own privacy policy.

7. Access to Information Principles

- 7.1. Individuals have the right to request access to general Library records and access to personal information (information about yourself) held by the Library. You may also request a correction to personal information. Your identity will need to be confirmed before you are provided with access to your personal information.
- 7.2. Library Board agendas and minutes, annual reports, policies, and a variety of other information will routinely be made a matter of public record through the Library.
- 7.3. In addition to the information that is available on the Library website, you have the right to request access to general records of the Library subject to the rules laid out in the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA). All such requests for access to information must be sent in writing to:

Director of Support Services
Pickering Public Library
One The Esplanade, P.O. Box 368
Pickering, ON L1V 2R6

- 7.4. Where possible, requests will be handled through the informal request/routine disclosure process. You will be contacted by the Library to discuss the nature of your request and the type of records at issue to determine whether the matter should be handled informally or by means of a formal request under the Act.

8. Making an Informal Request

- 8.1. Typically, if the request is simply for information or for an answer to a question, no specific record is desired. Therefore, your request is considered to be "informal". If a specific record is requested, the Library shall verify that the record is classed as a public record and qualifies for routine disclosure. Otherwise, you will be directed to complete a "formal" Application for Access/Correction of Records (see Appendix 1).

9. Making a Formal Request

- 9.1. Once it has been determined that a formal request is needed, an [Application for Access/Correction of Records](#) form is to be completed. The Application is available from the Director of Support Services and on the Library's website.
- 9.2. All formal requests for information should include a \$5.00 mandatory application fee (see Appendix 2 for Fee Schedule).

- 9.3. Besides the application fee to be paid when your request is submitted, the Library may charge additional fees to respond to requests as outlined in the MFIPPA regulations. Such fees may include search/retrieval time, photocopying charges, and time spent preparing records for disclosure.

10. Correcting Your Personal Information Held by the Library

- 10.1. If you believe there is an error or omission in your personal information, you have the right to request correction of your personal information held by the Library. Library staff at any location will assist you with this process. There is no charge for this process.

3. RELATED POLICIES & PROCEDURES

- Internet Use Policy
- Video Surveillance Policy

4. APPENDICES

- Appendix 1 - Application for Access/Correction of Records
- Appendix 2 - Fee Schedule

For further information please contact the Director of Support Services. Contact information for all members of the Leadership Team can be found on the Pickering Public Library website.

Alternate formats of this document are available upon request. Please speak to Library staff for assistance.

Application for Access/Correction to Records

Municipal Freedom of Information and Protection of Privacy Act

<input type="checkbox"/> Access to general records <input type="checkbox"/> Access to own personal information <input type="checkbox"/> Correction of own personal information	Name of Institution request made to: CEO Pickering Public Library One The Esplanade Pickering, ON L1V 6K7 Tel: 905.831.6265
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If request is for access to, or correction of, own personal information records:

Last name appearing on records: ☐ same as below **or**

Last Name			First Name			Middle Name		
Unit No.	Street No.	Street Name				PO Box		
City/Town					Province		Postal Code	
Day Telephone Number (include area code)					Email			

Detailed description of requested records, personal information records or personal information to be corrected. (If you are requesting access to, or correction of, your personal information, please include **your date of birth** and identify the personal information bank or record containing the personal information, if known)

Note: If you are requesting a correction of personal information, please indicate the desired correction and, if appropriate, attach any supporting documentation. You will be notified if the correction is not made and you may require that a statement of disagreement be attached to your personal information

Preferred method of access to records <input type="checkbox"/> Receive Copy <input type="checkbox"/> Examine Original	Signature	Date (yyyy/mm/dd)
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Each separate request must be accompanied by the \$5.00 application fee. Cheque or money orders should be made payable to the Pickering Public Library.

Payment Options for Visa and MasterCard in person only.	<div style="display: flex; justify-content: space-between; padding: 5px;"> Payment Options by mail Money Order Cheque </div>
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Signature	Date (yyyy/mm/dd)
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Personal information contained on this form is collected pursuant to the *Freedom of Information and Protection of Privacy Act* and will be used for the purpose of responding to your request. Questions about this collection should be directed to Director of Support Services, Pickering Public Library, One The Esplanade, Pickering, ON L1V 6K7.

Fee Schedule

Fee Charges for requests for general information

Application Fee	\$5.00	To be paid when request is submitted
Search Time	\$7.50	Per each ¼ hour required to search and retrieve records
Record Preparation	\$7.50	Per each ¼ hour required to prepare records for release
Photocopying	\$0.20	Per page
Computer Programming	\$15.00	Per each ¼ hour if needed to develop program to retrieve information
CD/DVD	\$10.00	each

Fee Charges for requests for personal information

Application Fee	\$5.00	To be paid when request is submitted
Search Time	N/A	
Record Preparation	N/A	
Photocopying	\$0.20	Per page
Computer Programming	\$15.00	Per each ¼ hour if needed to develop program to retrieve information
CD/DVD	\$10.00	each

Estimates

Fee estimates will be given if anticipated fees are \$25.00 or more. If the estimate of fees to be paid is \$100.00 or more, the requester may be required to pay a 50% deposit.

Appeals

General Records	\$25.00
Personal Information	\$10.00

Appeal fees are to be paid up front and our Notice of Decision must advise the requester of these appeal fees.