

**Access to Information and Protection of Privacy Policy –
Revisions**

Date:	June 21, 2010
To:	Toronto Public Library Board
From:	City Librarian

SUMMARY

This report presents proposed revisions to the Library's Access to Information and Protection of Privacy Policy.

The current policy has been in force since March 2007. It is important at this time to update the policy to reflect current information collection and practices resulting from changes to the Integrated Library System (ILS) and the Library website, to update information related to the use of new technologies, and to meet the changing expectations of the public.

The current policy allows for the disclosure to the Toronto Public Library Foundation of customer contact information with the consent of the user, for fundraising purposes. In order to support more effective interactions with donors and potential donors, the Foundation has requested that additional information be included in the request for consent.

RECOMMENDATIONS

The City Librarian recommends that the Toronto Public Library Board:

1. approves the revised Access to Information and Protection of Privacy Policy (Attachment 1).

Implementation Points

1. The proposed revisions are to be implemented on a go-forward basis.
2. Registration procedures will be amended to reflect the changes to the policy.
3. Changes will be made to the conditions of use and communicated to library card holders upon registration and renewal, and through other communication vehicles.

FINANCIAL IMPACT

This report has no financial implications.

The Director, Finance & Treasurer has reviewed the financial impact statement and is in agreement with it.

DECISION HISTORY

The Access to Information and Protection of Privacy Policy was introduced in 2006 and revised in 2007. The Library's privacy policy was enacted when the Library was using the previous ILS system, Dynix, to administer the circulation function and to manage personal information. With the upgrade to Symphony, the Library's retention practices have changed.

The Foundation's fundraising strategies include direct contact with existing donors and potential donors. This includes those Library users who have opted-in to be contacted by the Foundation for fundraising purposes. The Foundation is seeking access to additional personal information in order to enhance the effectiveness of these communications.

Other factors that have led to the revision of the Library's privacy policy include the introduction of radio frequency identification (RFID) and the need for opt-in provisions.

ISSUE BACKGROUND

It is important for the Library's privacy policy to accurately reflect its operations and practices. The Library is committed to protecting the users' personal information as prescribed in MFIPPA. The Library, in its Access to Information and Protection of Privacy Policy, commits itself to only disclose personal information with the consent of its users.

ILS

With the upgrade from the existing ILS, retention practices have changed. The previous policy included the retention periods for information held by the ILS; the revised policy includes a current and accurate description of the retention of personal information related to circulation functions, and a reference to the Library's Directory of Personal Information Banks. The Directory of Personal Information Banks provides a comprehensive list of all of the personal information retained by the Library.

RFID

The Library's technological environment has changed since the previous revision of the policy. In addition to the new ILS and associated databases, the Library now employs the use of radio frequency identification (RFID) for circulation services. RFID readers do not collect or allow access to any personal information. The inclusion of a statement regarding RFID was identified as a point of action in the Privacy Impact Assessment of the ILS.

Opt-in option

The expectations of the public to access their own information and to personalize their library experience have been changing. As an example, many customers are interested in being able to review information such as borrowing history to help guide future reading. This will require changes in the technology and, while not immediately available, it is important to introduce language to address this anticipated change. The current policy does not discuss the retention of information such as borrower history information, or other information retained on a voluntary, opt-in basis. The new policy describes the new opt-in retention of information. As these options are introduced, the Library will also need to develop clear communications about the implications of these new approaches. The public expects that the Library will not only use that information to provide new services and enhance existing services, but that this information will be protected with the same integrity that personal information in the ILS is afforded.

Toronto Public Library Foundation

The Foundation wishes to contact Library users by key methods of communication, including telephone, mail and email. The Foundation is requesting the addition of the consenting users' telephone number, gender and date of birth information to the current information received which includes name, address and email address and frequency of use under the current policy. With this additional information, the Foundation can properly address Library users in a professional and accurate manner and ensure personalized correspondence.

The Foundation currently receives 'frequency of use' information which is a term associated with the previous ILS. The 'date of last activity' used by the current system provides more useful information which is defined as the most recent activity on a customer account. Similarly, the Foundation would like to receive information about the length of time card holders have been members, in order to communicate personally and appropriately with both long-time and new library users.

The provision of this additional personal information for fundraising purposes to the Foundation is consistent with the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).

There is also some clarifying language and some additional changes included to the format of the policy.

CONTACT

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SIGNATURE

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ATTACHMENTS

Attachment 1: Revised Access to Information and Protection of Privacy Policy