



**STAFF REPORT
ACTION REQUIRED**

Artificial Intelligence Policy

Date: January 27, 2025

To: Toronto Public Library Board

From: City Librarian

SUMMARY

This purpose of this report is to seek Toronto Public Library Board approval of the Artificial Intelligence (AI) Policy (Attachment 1).

Although there is currently little policy or legislative direction related to AI either locally or nationally, and the field is evolving rapidly, the need for an AI Policy for Toronto Public Library (TPL) has been identified, both to mitigate known risks, as well as to leverage the opportunities that AI may create. The policy provides guidance to TPL staff for the secure, responsible, ethical and effective use of AI tools.

The policy will support implementation of TPL's 2025-2029 Strategic Plan priority for Learning and Growth and the objective of providing residents and staff with the digital literacy skills they need to adapt to changes in technology, like AI. This will include the launch of new AI upskilling initiatives in 2025 that will make AI tools and resources available in TPL branches, equip 3,700 Torontonians from equity-deserving groups with formal AI training

certifications, and expand access to TPL's AI and digital inclusion programs and services supported by a sponsorship secured by the TPL Foundation.

The AI Policy sets out principles for the responsible use of AI tools by TPL staff in the areas of security and reliability, privacy, accountability and transparency, algorithmic bias and equity, sustainability and continual learning. These principles were developed based on emerging best practices identified through the jurisdictional scan, as well as consultation with stakeholders to identify TPL-specific considerations.

The policy aligns with current relevant and available legislation, frameworks and leading practices. It outlines TPL's commitment to responsible AI use to ensure ethical considerations are upheld, AI risks are managed and compliance to emerging regulation is achieved. AI has the potential to dramatically change the workplace and library services, and TPL needs to be prepared to respond and adapt. TPL also has an opportunity to be a leader in this space by establishing an AI policy that can potentially serve as a model for other libraries and organizations.

Over the next several months, an implementation plan will be developed by staff to ensure the effective operationalization of this policy, including timelines for the short- and medium- term initiatives. As the technological and regulatory environment for AI is rapidly evolving, TPL is committed to continued engagement, monitoring and assessment of developments related to AI, and to adapt services and policy as needed in response.

RECOMMENDATIONS

The City Librarian recommends that the Toronto Public Library Board:

1. approves the Artificial Intelligence Policy, appended as Attachment 1; and
2. directs staff to provide an update report to the Board with further details on the implementation plan by the end of Q2 2025.

FINANCIAL IMPACT

This report has no financial impact beyond what has been approved in the current year's budget.

The Director, Finance & Treasurer has reviewed this financial impact statement and agrees with it.

ALIGNMENT WITH STRATEGIC PLAN

This policy advances TPL's 2025-2029 Strategic Plan priority of Learning and Growth, specifically contributing towards achieving the outcome of ensuring that residents have the digital literacy skills they need to adapt to changes in technology, like AI, and thrive in the modern world. By supporting staff to use AI technology effectively and responsibly, the policy also contributes to the Strategic Plan objective of equipping staff with the skills they need to support the development of multiple literacies for customers.

EQUITY IMPACT STATEMENT

This policy advances the Library's commitment to achieving equity and inclusion by ensuring that any use of AI tools is conducted in an ethical and responsible manner that mitigates against the risks of algorithmic bias and discrimination. It commits TPL to undertaking a Human Rights AI assessment, as recommended by the Ontario Human Rights Commission, prior to deploying any AI tool, and also directs staff to ensure appropriate accountability and oversight to assess for discrimination in any content and decisions produced by AI tools.

DECISION HISTORY

At its meeting on April 25, 2022, the Library Board approved [TPL's Policy Development Framework](#), which sets out how policies are developed, reviewed and approved for TPL.

At its meeting on December 2, 2024, the Board approved the report [Sponsorship for TPL Artificial Intelligence Upskilling Initiative](#), which approved a

sponsorship to make AI tools and resources available in TPL branches and expand access to TPL's AI and digital inclusion programs and services.

COMMENTS

Context and need for the AI Policy

AI technology and tools are rapidly developing and increasingly available, both through publicly available online tools like ChatGPT, as well as AI functionality integrated into existing software and applications like Google and Microsoft. These AI tools present opportunities to increase efficiency and provide valuable insights, as well as raising significant risks and concerns for public sector and information organizations like TPL.

Although there is currently little policy or legislative direction related to AI either locally or nationally, and the field is evolving rapidly, there is a need for a TPL AI policy, both to mitigate some of the concerns that are being raised in regards to AI and to provide guidance to staff about the use of AI tools, as well as to leverage the opportunities that AI may create.

TPL's 2025-2029 Strategic Plan priority for Learning and Growth includes a focus on ensuring that residents have the digital literacy skills they need to adapt to changes in technology, like AI, as well as equipping staff with the core digital literacy skills they need, including in emerging technologies like AI. This will include the launch of new AI upskilling initiatives in 2025 that will make AI tools and resources available in TPL branches, equip 3,700 Torontonians from equity-deserving groups with formal AI training certifications, and expand access to TPL's AI and digital inclusion programs and services, supported by a sponsorship secured by the TPL Foundation. This policy will support implementation of that initiative and TPL's Strategic Plan priority.

AI has the potential to dramatically change the workplace and library services, and TPL needs to be prepared to respond and adapt. TPL also has an opportunity to be a leader in this space by establishing an AI policy that can potentially serve as a model for other libraries and organizations.

This policy aligns with relevant available legislation, frameworks and leading practices related to the ethical and transparent use of AI. It outlines TPL's

commitment to responsible AI use to ensure ethical considerations are upheld, AI risks are managed and compliance to emerging regulation is achieved.

Legislative and Jurisdictional Scan Summary

In developing the AI policy, staff conducted a comprehensive environmental scan of best practices and leading guidance on developing AI policies, and internal staff from a cross section of departments were consulted. TPL also engaged external legal council with expertise in emerging AI regulatory context, as well as Dr. Ben Lee, a professor at the Information School at the University of Washington, whose research focusses on the ethical and sociotechnical implications of machine learning.

While there are few library systems that have AI policies currently in place, Vancouver Public Library, Columbus Public Library, and New York Public Library were identified in the environmental scan as having some form of AI policies, which were reviewed.

Municipally, the City of Toronto has a [Digital Infrastructure Strategic Framework](#) that was approved in April 2022, which includes a strategic priority related to Algorithmic Transparency and Responsibility. The framework proposes a number of implementation considerations related to AI which are still in development, including establishing a governance structure, developing a City policy and ensuring appropriate oversight mechanisms and safeguards are in place.

Provincially, [Bill 194, Strengthening Cyber Security and Building Trust Act](#) was approved in December 2024 and includes provisions to enact an Enhancing Digital Security and Trust Act at a future date to be proclaimed by the Lieutenant Governor. The Act creates regulatory authority for the government to establish rules related to providing information to the public about use of AI, creation of risk management and accountability frameworks, as well as establishing prohibited uses. There are no details currently available about when that Act may come into force or when the regulations may be developed. A [Trustworthy Artificial Intelligence Framework](#) for Ontario is also under development.

Federally, the [Artificial Intelligence and Data Act \(AIDA\)](#) is intended to set the foundation for the responsible design, development and deployment of AI

systems in Canada. The Act received a second reading in 2023 and was being considered by the Standing Committee on Industry and Technology prior to Parliament being prorogued in early January. Innovation, Science and Economic Development Canada (ISED) announced a [Voluntary Code of Conduct on the Responsible Development and Management of Advanced Generative AI Systems](#) in September 2023, which is a set of voluntary commitments intended to commit developers and managers of advanced generative systems to take steps to identify and mitigate related risks. It is intended to act as a bridge to when the proposed Artificial Intelligence and Data Act (AIDA) comes into force. There are currently 40 signatories to the code of conduct.

AI Policy Overview

The AI Policy for TPL sets out principles for the responsible use of AI tools by staff in the areas of security and reliability, privacy, accountability and transparency, algorithmic bias and equity, sustainability and continual learning. These principles were developed based on emerging best practices identified through the jurisdictional scan, as well as consultation with internal stakeholders to identify TPL-specific considerations.

Security and reliability

- Ensuring that AI tools used by TPL staff are secure and reliable is a critical aspect of responsible AI use.
- The policy commits TPL to conducting an IT Security Assessment before any AI tool is approved or deployed for staff use, and appropriate risk mitigation measures are identified and implemented based on the Assessment.
- TPL will align this approach with the [National Institute of Standards and Technology AI Risk Management Framework](#) (NIST AI RMF), which is an internationally-recognized standard that was developed through a consensus-driven, open, transparent, and collaborative process. It also aligns with TPL's existing approaches to Information Security and cybersecurity risk assessment.

Privacy

- Because AI systems can collect and process large amounts of data, and require certain inputs in order to be used, privacy is a critical risk to address when considering AI use.

- The policy identifies that a privacy impact assessment will be completed before any AI tool is approved or deployed for use by staff, and appropriate risk mitigation measures identified and implemented.
- All current TPL confidentially and privacy practices will be upheld by staff when using AI tools, and staff are directed by the policy to never upload Personal Information (PI) and other restricted and confidential information into an AI tool, unless the tool has been specifically approved by TPL for that purpose.
- Additional training and guidance will be provided to staff related to privacy to ensure clear understanding of these requirements.

Accountability and Transparency

- AI tools have a well documented issue with providing false or misleading information in its results, sometimes referred to as 'hallucinations'. Some early tests and research studies have shown that AI does not perform as well as humans in summarizing information correctly, and demonstrates the need for effective human oversight of AI-generated outputs as a key component of responsible AI use.
- The policy outlines the requirement for TPL staff to critically evaluate all outputs of AI tools. They are accountable for the accuracy and appropriateness of AI generated content.
- The policy also outlines TPL's commitment to transparency about where and how AI is used, and to provide information to the public about where and how AI is used.

Algorithmic bias and equity

- Bias and discrimination are also well-known risks associated with AI outputs.
- To mitigate this risk, the policy identifies that TPL will complete a Human Rights AI assessment before an AI tool is deployed, as recommended by the [Ontario Human Rights Commission](#), that aims to identify, assess, minimize or avoid discrimination and uphold human rights obligations throughout the lifecycle of an AI system.
- The policy also identifies that TPL will strive to ensure that AI tools are tested for bias, that data used in AI tools is high quality and accurate, and that products created by AI tools are vetted for discriminatory bias.

Sustainability

- The United Nations Environmental Programme (UNEP), the leading global environmental authority, has identified that AI creates negative environmental impacts across its lifecycle, including increased demand for mineral extraction related to processing chips, production of e-waste, significant consumption of freshwater resources and increasing energy use which contributes to greenhouse gas emissions. For example, a single request made through an AI-based virtual assistant is estimated to consume 10 times the electricity of a traditional internet search.
- However, limited data or research is available about the specific environmental impacts of AI tools, due to the proprietary nature of such systems and lack of standardization and regulation in this area.
- The policy identifies that TPL will strive to incorporate a sustainability assessment, based on available information, into the selection of AI tools and aim to recommend AI tools that incorporate lower energy consumption approaches where possible.
- It also directs staff to be mindful of the extreme resource needs of AI tools and consider using an alternative approach if the use of AI for the same task would yield a comparable result and use of staff time.

Continual Learning

- The technological and regulatory environment for AI is rapidly evolving, and TPL is committed to continued engagement, monitoring and assessment of the field to adapt services and policy as needed in response.
- Staff will be provided with ongoing training on the use of AI in the workplace to ensure effective implementation of this policy.

Next steps

Over the next several months, an implementation plan will be developed by staff to ensure the effective operationalization of this policy, including timelines for the short- and medium- term initiatives. An update with more details on the implementation will be provided to the Board by the end of Q2 2025.

Deliverables to be included in the implementation plan include:

- Establishing a process to identify and assess recommended tools for staff use, including privacy and risk assessments;
- Providing relevant training for staff;

- Developing guidelines for the use of AI in specific service areas to provide direction to staff in the application of the policy;
- Communicating the policy to partners and integrating policy requirements into new contracts and service agreements; and
- Identifying emerging and future opportunities to leverage AI tools to improve efficiencies and services for customers

CONTACT

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SIGNATURE

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ATTACHMENTS

Attachment 1: Artificial Intelligence Policy

Policy Title: AI Policy

Page 1 of 8

Policy Classification: Board Policy

Artificial Intelligence (AI) Policy

Policy Classification: Board Policy

Motion # and Approval Date: [Include the Motion # and date the policy was *first* approved by the Board]

Purpose

The purpose of this policy is to provide guidance to all Toronto Public Library (TPL) staff for the secure, responsible, ethical and effective use of AI tools. The policy outlines the requirements that all staff must follow when using AI tools in the workplace.

Scope

This policy applies to all TPL staff using public AI tools, including AI functions embedded within existing software, and any private AI systems that TPL develops or purchases for TPL business purposes. The policy applies to the use of AI tools in all of TPL's service pillars and administrative functions, including programming, collections, technology, data analysis, human resources, and procurement.

TPL will work to ensure that all external partners, vendors and presenters adhere to this policy and incorporate the responsible and ethical use of AI tools in their dealings with TPL.

The individual customer use of AI tools is out of scope of this policy. The TPL Rules of Conduct policy, Public Computing & Internet Use policy, and Wireless Terms and Conditions apply to all customer activities, including those undertaken using AI tools provided by or accessed through resources provided by TPL.

Underlying Principles

This policy is driven by principles as defined in the Library's Values, Vision and Mission and in TPL's Equity Statement and Intellectual Freedom Statement.

Policy Statement

Toronto Public Library recognizes the transformative potential of AI tools to enhance library operations and services. They have the potential to enhance access to knowledge, provide valuable insights, improve efficiency and spur innovation. However, the use of AI tools also presents challenges and risks to TPL operations related to information security, privacy, transparency, equity and disruption to information environments.

TPL is committed to providing staff with the tools and information they need to successfully engage with artificial intelligence platforms and the content that they generate. This policy sets out principles for the secure, responsible, ethical and effective use of AI tools by staff, while mitigating the risks involved. This policy aligns with relevant legislation, frameworks and leading practices related to the ethical and transparent use of AI. It outlines TPL's commitment to responsible AI use to ensure ethical considerations are upheld, AI risks are managed and compliance to emerging regulation is achieved.

1. Security and reliability

- 1.1 TPL is committed to responsible deployment of AI tools that strive to achieve appropriate levels of the trustworthy characteristics outlined by the National Institute of Standards and Technology AI Risk Management Framework (NIST AI RMF).
- 1.2 An IT Security Assessment will be completed before an AI tool is approved and/or deployed for use by staff and appropriate risk mitigation measures identified and implemented.
- 1.3 TPL staff will only use AI tools that have been assessed and approved before use to ensure they are safe, secure and robust, and reliable for the specific purpose intended.
- 1.4 All TPL IT security practices will be applied to the use of AI tools, consistent with TPL's Information Security Policy.

2. Privacy

- 2.1. Recognizing that uploading or inputting data into some AI tools may provide data to third parties for their own use and/or contribute to the training of the AI model, TPL is committed to minimizing the impact of this risk. Assessment and understanding of how the AI tool will store, transmit, and use inputs will be incorporated into the review of recommended AI tools.
- 2.2. An AI Privacy Impact Assessment will be completed before an AI tool is approved and/or deployed for use by staff and appropriate risk mitigation measures identified and implemented.
- 2.3. When using AI tools, all TPL confidentiality and data privacy practices will be upheld, in accordance with TPL's Access to Information and Protection of Privacy Policy and the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).
- 2.4. At a minimum, Personal Information (PI) and other restricted and confidential information will never be uploaded into an AI tool, unless the tool has been specifically approved by TPL for that purpose. Staff will not input data (including any confidential information), text, or pictures that would compromise the TPL.

3. Accountability and transparency

- 3.1. TPL is committed to ensuring that all processes and content related to AI are subject to proper oversight mechanisms and to providing transparency about the use of AI.
- 3.2. When using AI tools, TPL staff should recognize the limitations and biases of AI technologies and critically evaluate the outputs. AI tools can enhance productivity but do not replace professional judgement or decision making.
- 3.3. TPL staff are responsible for the accuracy and appropriateness of AI-generated content and will review outputs for accuracy as well as compliance with organizational standards and values. No AI-generated work product will be used or published without oversight from a TPL staff person. Decisions impacting peoples' lives should not be fully automated and should always be

made by humans.

- 3.4. TPL is committed to transparency about where and how AI is used. Meaningful and timely information about use of AI tools by the Library will be provided publicly, that includes clear explanation in accessible plain language.
- 3.5. TPL staff are responsible for clearly identifying all work products that have been substantially generated using AI.

4. Algorithmic bias and equity

- 4.1. TPL recognizes that algorithmic bias is a well-known risk associated with AI and is committed to using AI in ways that are non-discriminatory and promote inclusivity and equitable outcomes.
- 4.2. A Human Rights AI Impact Assessment will be completed before an AI tool is deployed.
- 4.3. TPL will strive to ensure that AI tools are tested for bias and that work products created through AI tools are vetted by staff subject area specialists for discriminatory bias.
- 4.4. TPL staff are responsible for ensuring that the data chosen to be used in an AI tool for a specific purpose is of high quality, accurate and free of bias that can pose risks, cause harm, or reinforce various forms of discrimination.

5. Sustainability

- 5.1. TPL recognizes that generative AI systems can be a significant source of greenhouse gas emissions and water usage and will promote the environmentally responsible development and use of AI.
- 5.2. TPL will strive to incorporate a sustainability assessment, based on available information, into the selection of AI tools, and aim to recommend AI tools that incorporate lower energy consumption approaches in the design of software, hardware and training models.
- 5.3. Staff should be mindful of the extreme resource needs of AI tools and consider using an alternative approach if the use of AI for the same task

would yield a comparable result and use of staff time.

6. Continual Learning

- 6.1. As the technological and regulatory environment of AI rapidly develops, TPL is committed to a culture of open-mindedness, flexibility, and dialogue. TPL will continue to engage with staff, partners, peers, stakeholders, and the public to invest in shared knowledge and a shared vision for responsible AI.
- 6.2. TPL is committed to respecting copyright and will continue to monitor the legal status of AI tools in Canada as policies, regulations and case law evolves.
- 6.3. TPL will provide ongoing training for staff on the use of AI in the workplace. This will include the cybersecurity and privacy implications of the use of AI in the workplace, as well as training on how to assist customers in understanding AI-generated content online and in media.
- 6.4. AI has the potential to have significant impacts on library services, including related to data management, preservation, discovery, analytics and the need for AI literacy skills development. TPL will continue to monitor and assess the future impacts of AI on libraries, and adapt services as needed.

Specific Directives

Guidelines for application of this policy to specific service areas will be developed to provide direction to staff in the application and implementation of this policy.

Accountability

The Director, Policy, Planning and Performance Measurement has overall responsibility for this policy.

All Directors are accountable for ensuring implementation and compliance with the Artificial Intelligence Policy in their respective areas.

Related Legislation

[Enhancing Digital Security and Trust Act, 2024](#)
[Working for Workers Four Act, 2024](#)
[City of Toronto Digital Infrastructure Strategic Framework](#)

Related Library Policies

[Access to Information and Protection of Privacy Policy](#)
Information Security Policy
[Public Computing & Internet Use Policy](#)
[Rules of Conduct Policy](#)

Definition of Terms

Algorithmic discrimination/bias

Refers to instances when automated systems contribute to unjustified different treatment or impacts disfavoring people based on their actual or perceived race, color, ethnicity, sex (including based on pregnancy, childbirth, and related conditions; gender identity; intersex status; and sexual orientation), religion, age, national origin, limited English proficiency, disability, veteran status, genetic information, or any other classification protected by law.

Artificial Intelligence

A machine-based system that, for explicit or implicit objectives, infers from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments. Different AI systems vary in their levels of autonomy and adaptiveness after deployment.

Confidential Data

A class of data that should be contained within the organization to the extent possible as general disclosure could negatively influence operations and/or the TPL brand, but where specific disclosure of certain sub-sets may be permitted or required by law.

Generative AI

A type of AI that produces content such as text, audio, code, videos and images. This content is produced based on information the user inputs, called a “prompt,” which is typically a short instructional text.

Personal Information

Recorded information about an identifiable individual, including:

- (a) information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual,
- (b) information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,
- (c) any identifying number, symbol or other particular assigned to the individual,
- (d) the address, telephone number, fingerprints or blood type of the individual,
- (e) the personal opinions or views of the individual except if they relate to another individual,
- (f) correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence,
- (g) the views or opinions of another individual about the individual, and
- (h) the individual’s name if it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.

Private AI

An AI system that is developed or acquired by an organization, and operates in a closed, restricted environment.

Public AI

AI system that is accessible to a broad audience through open platforms, APIs, or cloud-based services. Data input into public AI systems becomes part of the public dataset and is therefore accessible to other users.

Restricted Data

A class of data that must be contained within the organization to only those staff, volunteers and third parties working on behalf of TPL who need to know the information to perform their duties (including but not limited to personal information), as any disclosure not expressly permitted or required by law could not only negatively influence operations and/or the TPL brand but could also constitute a breach of law or contractual or regulatory requirements, and put TPL, external organizations and/or affected individuals at risk of legal, financial and/or reputational damage

Work product

Any deliverable or tangible outcome produced as a result of work activities within a project or task. This can include documents, emails, software, presentations, reports, designs, models, and other artifacts that demonstrate progress or completion of work, measure performance, ensure quality, or facilitate communication among stakeholders. At TPL, this could also be branch posters, social media posts, programming content, website content, etc.

Contact

Director, Policy, Planning and Performance Management