



# Woodstock Public Library Policy

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**Policy Name:** Access to Information, Protection of Privacy, and Electronic Messaging

**Category:** Library Administration

**Version:** June 10, 2025

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## POLICY STATEMENT AND RATIONALE

The Woodstock Public Library recognizes that all people have the right to privacy and confidentiality regarding their use of library services, collections, and online spaces, and in the collection of personal information in the library. In matters related to privacy and access to information, the Woodstock Public Library is guided by the Ontario ***Municipal Freedom of Information and Protection of Privacy Act***, R.S.O 1990, c. M.56 (MFIPPA).

### Scope

This policy applies to all services and operations of the Woodstock Public Library Board, its staff, Board members, and volunteers.

### The Library and Privacy

The Woodstock Public Library Board will protect the privacy of all individuals' personal information in its custody or control, in keeping with the privacy provisions of MFIPPA and other applicable legislation.

#### 1. Collection of Information

- a. Personal information is defined in ***Municipal Freedom of Information and Protection of Privacy Act***, R.S.O 1990, c. M.56 (MFIPPA), in part, as "recorded information about an identifiable individual." This could include, in the library context, information on an individual's borrowing habits, as well as information related to computer use or program registration.

- b. The Woodstock Public Library collects the following identifiable pieces of information:
- i. Name, address, birthdate, telephone number, and email address of each registered library user (i.e. patron),
  - ii. Information about what an individual library user has on loan or items placed on hold,
  - iii. Information about fees,
  - iv. Information about a public meeting room space booked by a specific individual,
  - v. Information about programs an individual has registered to attend,
  - vi. Information about when an individual booked a public computer and/or their internet search history,
  - vii. Information about an individual's request for material through inter-library loan. As part of a provincial network, some of this information resides on external servers and the Library cannot guarantee the use or protection of this information.
- c. The Library and patrons 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 patron.
- d. The Library collects comment forms, registration forms, requests for materials and program reconsideration, and correspondence. All received correspondence to the Library Board is part of the Board's public documents, except for correspondence related to a closed meeting as permitted under the Ontario **Public Libraries Act**, R.S.O. 1990, c.P.44. The library system collects images and video through security cameras. Images are used to ensure the security and safety of staff and individuals using the library.
- e. Identifiable information may be given to authorized agencies in any of three formats – in person, in writing, electronically – and this privacy policy covers all three circumstances.
- f. The Library provides access to digital content through subscriptions and services provided by third-party vendors, whose policies concerning privacy and user information may differ from the Woodstock Public Library. Each digital vendor must include a statement in their contract that states the personal information they have access to can only be used for the purpose of carrying out the intended library service. Use of these services is optional and any additional information provided by the patron to a third-party vendor is considered voluntary and not within the scope of this policy.

## 2. Use of Information

- a. The collection of personal information is limited to that which is necessary for the administration of the library and the provision of library services and programs.
- b. The purpose for which personal information is collected from an individual is identified by the library at, or before, the time the information is collected, and that consent is given by the individual at that time.
- c. As using personal information for other purposes than originally intended is not permitted by MFIPPA, if the Library wishes to use an individual's personal information for a purpose that is not consistent with the one for which it was originally obtained or compiled, it must first acquire the individual's written consent to use the personal information for that new purpose.

## 3. Disclosure of Information

- a. The Library will not disclose personal information related to a visitor or library patron to any third party without obtaining consent to do so, subject to certain exemptions as provided in section 32 of MFIPPA. Disclosure is permitted in some situations with the approval of the CEO, which are covered by the Library's Trespass Policy, Video Surveillance Policy, Safety of Children in the Library Policy, and the Library's Public Code of Conduct.

## 4. Retention of Information

- a. The Library will not retain personal information related to the items borrowed or requested by a patron, or pertaining to a patron's online activity, longer than is necessary for the provision of library services and programs.

## 5. Responsibility for Privacy

- a. The Library Board is responsible for personal information under its control and designates the Chief Executive Officer (CEO) as the individual accountable for the library's compliance with legislation. The CEO ensures that the requirements around the collection, use, and disclosure of information are followed.
- b. All Woodstock Public Library staff and volunteers will be made aware of the importance of maintaining the confidentiality of personal information.

- c. Any library patron who feels their privacy has not been protected may challenge library practices, in writing, to the CEO. A patron who is not satisfied with the result of a challenge submitted may appeal, in writing, to the Library Board, maintaining either that the current policy has been violated or that the current policy needs to be changed to address a perceived issue.
- d. A breach is any unauthorized or illegal collection, use, or disclosure of personal information. In the event of a breach, the CEO or designate will:
  - i. Contain the breach and repatriate the information (if possible to do so),
  - ii. Assess the severity of the breach,
  - iii. Notify affected parties and the Information and Privacy Commissioner, as required,
  - iv. Investigate the cause of the breach,
  - v. Implement corrective actions.

## **The Library And Access to Information**

1. The Woodstock Public Library is committed to making access to information about the operations of the Library available to the public. Library Board agendas and minutes, annual reports, policies, and a variety of other information are made a matter of public record through the Library's website and through Library publications and postings. In accordance with the Public Libraries Act, the public can inspect any records that the Board's secretary has on file except where exemptions are allowed under Section 6-16 of MFIPPA.
2. Responding to requests for library information is a statutory obligation and will be completed in a timely manner.
3. All Library patrons 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. All requests are subject to the exemptions outlined in the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).
  - a. Informal Requests
    - i. Patrons must provide appropriate identification before personal information will be provided. For example, upon presentation of his/her library card or other approved photo identification, a patron may query his/her records and/or the records of his/her minor age children or wards.

b. Formal Requests

- i. Information from the Library's database files shall only be released to the police or government agencies upon the presentation of a proper and valid warrant. In the absence of a warrant, the information requested must be in accordance with Section 32(g) and 32(i) of the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA). In such cases, the CEO or designate has the authority to release personal information to the police or government agencies in Canada to aid an investigation leading or likely to lead to a law enforcement proceeding or in compassionate circumstances to facilitate contact with next of kin of an individual who is injured or deceased. All such requests must be documented.
- ii. All formal requests for personal or operational information must be done in writing. Freedom of Information (FOI) forms are available through the Woodstock Public Library's Freedom of Information Coordinator, or via the City's website. For more information or to submit a formal request, patrons should contact:

FOI Coordinator  
City Clerks Department  
Woodstock City Hall  
P.O. Box 1539  
Woodstock ON N4S 0A7  
519-539-1291

## **The Library and Electronic Messages under CASL**

1. All electronic messaging sent by the Library is consistent with Canada's Anti-Spam Legislation (CASL).
2. The Library will ensure that all electronic messages clearly identify the:
  - a. Subject of the communication,
  - b. Sender (Woodstock Public Library),
  - c. Library's mailing address and contact information,
  - d. Mechanism that an individual may unsubscribe from receiving further messages.
3. At the time of registration for a library card, specific pieces of information are collected. Obtaining a library card implies the individual's consent to authorize the Library to send electronic notifications regarding personal borrowing, transactional activities, and library service information if an email address was provided at time of registration. Individuals may request not to receive these

notifications, although such an action may affect their ability to use certain library services.

4. The Library may use electronic means to promote services, share information, or announce special events. The Library will provide an opportunity for individuals to sign up for this communication, as well as provide options to easily unsubscribe from these services or to change their preferences at any time.

## **RELATED DOCUMENTS AND POLICIES**

Woodstock Public Library – Circulation Policy

Woodstock Public Library – Patron Code of Conduct

Woodstock Public Library – Safety of Children in the Library

Woodstock Public Library – Trespass Policy

Woodstock Public Library – Video Surveillance Policy

Canada's Anti-Spam Legislation (CASL), 2014

Municipal Freedom of Information and Protection of Privacy Act, RSO, 1990, c. M.56 (MFIPPA)

Public Libraries Act, 2011, S.O. 2001, c. P. 44

## **DOCUMENT REVISION RECORD**

|                 |                  |
|-----------------|------------------|
| Adoption Date:  | January 12, 2021 |
| Review Cycle:   | Once per Term    |
| Last Reviewed:  | June 10, 2025    |
| Resolution No.: | 25-57            |