



Privacy

Policy Objective

Vancouver Island Regional Library (VIRL) is committed to ensuring the privacy of all library users and staff, and complies with the provisions of the *Freedom of Information and Protection of Privacy Act* ("FIPPA").

This policy explains the ways in which VIRL collects, uses, discloses and protects personal information in compliance with *FIPPA*, and its processes for receiving and responding to requests that it receives for records in the custody or control of VIRL.

In accordance with the objectives of FIPPA, VIRL seeks to:

- be open and accountable by providing the public with a right to access records in the custody or control of the Library in accordance with the requirements of *FIPPA*;
- protect the personal information privacy of staff and library users as required by FIPPA and other applicable laws.

Definitions

The following terms when used in this Policy have the following meanings:

"records" include anything on which information is recorded or stored. At Vancouver Island Regional Library, this includes all paper and electronic records such as circulation records and Library user information.

"personal information" is recorded information about an identifiable individual, and includes such things as an individual's name, address, birth date, personal contact information and Library user ID number, but does not include business contact information.

"staff" includes all individuals employed or engaged by VIRL to perform services for or on behalf of VIRL, and includes volunteers.

Personal Information Privacy

VIRL is committed to protecting the privacy of individuals whose personal information we collect, use, share and retain through responsible information management practices.

All VIRL staff are expected to respect the privacy and confidentiality of personal information entrusted to the Library and to comply with the requirements of FIPPA.

Questions about how the *FIPPA* applies to VIRL records may be directed to VIRL's Privacy Officer at privacy@virl.bc.ca.

Limiting Collection, Use and Disclosure

VIRL collects, uses and discloses personal information about staff and library users only for purposes that are directly related to and necessary for its programs or activities or for other purposes authorized by FIPPA. VIRL ensures that personal information is collected, used and shared only for the purposes for which it was collected, except with the individual's consent or as required or permitted by FIPPA.

Identifying Purposes

Vancouver Island Regional Library communicates the purposes for which personal information is collected at or before the time the information is collected.

VIRL may collect, use or disclose personal information of library users for purposes that include:

- to track materials that have been borrowed from the Library;
- to ensure that Library materials are returned in a timely manner and in good condition;
- to monitor compliance with library policies;
- to communicate programs, contests or events to Library users;
- to process payments, such as unpaid fees, fines or other charges;
- to investigate incidents;
- to evaluate and improve the Library's programs and services;
- to ensure the safety and security of the Library, staff and Library property, including by the use of video security cameras; and
- for other purposes permitted or required by law.

VIRL may collect, use or disclose personal information of staff for purposes that include:

- to establish, manage, administer and end the employment or contractor relationship;
- to evaluate staff performance;
- to investigate breaches of Library policy or other misconduct and take corrective measures;
- for the purposes of paying salary or administering employment related benefits;
- to evaluate and improve the Library's employment related programs and services;
- to ensure the safety and security of the Library, staff and Library property;
- for other purposes permitted or required by law.

The Library may release relevant information to other libraries or companies acting on the Library's behalf for the collection of library property, unpaid fees, fines or other charges as permitted by law.

Securing Personal Information

The Library protects personal information by ensuring security safeguards appropriate to the sensitivity of the information are in place. Such security safeguards include physical, organizational and electronic safeguards.

Access to personal information by staff is role based and limited on a need to know basis. All staff members are expected to participate in required privacy training, and to be familiar with their obligations under this Policy and FIPPA.

Every member of Staff has a duty to protect the privacy and security of personal information collected and used by them as part of his/her ongoing employment responsibilities. The management and safekeeping of such information is the responsibility of all staff.

For information regarding privacy on the VIRL website, please see the Internet Access Policy.

Retention

Any personal information that is no longer required for either administrative, financial, legal or historical purposes shall be securely destroyed in a confidential manner in accordance with VIRL-approved record retention protocols.

However, personal information will be retained for specified periods where required by law. The *FIPPA* requires that any personal information that is used by VIRL for making a decision that directly affects an individual is to be retained by VIRL for at least one year after being used.

Accuracy and Correction

VIRL endeavours to ensure the accuracy and completeness of the personal information it collects and uses.

If a person believes that there is an error or omission in his or her personal information collected by VIRL, he or she may request the correction of the information in writing to the department responsible for the information. The department head or designate is responsible for, as appropriate, correcting the information or annotating the information, in consultation with the Privacy Officer and in accordance with the requirements of the *FIPPA*.

If a correction is made, VIRL will notify any other public body or third party to whom it has provided the incorrect information during the one-year period before the correction was requested.

Access to Information

Any person can make a request for access to records held by VIRL. All such requests must be in writing and be directed to the Library's Privacy Officer at privacy@virl.bc.ca. Records will be released in accordance with the requirements of FIPPA. Access requests will be date stamped and processed in accordance with the timelines set out in FIPPA.

No records may be released in response to an access to information request under any circumstances without the written authorization of VIRL's Privacy Officer.

Compliance and Contact Information

Requests for access to information, issues or complaints about the Library's compliance with the *FIPPA*, and questions or comments about this Policy may be addressed to the Library's Privacy Officer at privacy@virl.bc.ca

This policy may be updated from time to time.

Adoption History

ADOPTED BY:	DATE:
VIRL Board of Trustees	June 2010
VIRL Board of Trustees	November 25, 2017
VIRL Board of Trustees	June 11, 2022
DATE OF NEXT REVIEW: 2027	REVIEW CYCLE: 5 years