

Title	Confidentiality of User Records		
Number	86/28 (replaces 86/04)	Date	Jan 10, 1991
Revised	Nov 12, 1997; Oct 01, 2012; Mar 16, 2026; Aug 10, 2026		
Policy			
The Fort Saskatchewan Public Library Board and staff are committed to protecting individual privacy and maintaining the absolute confidentiality of patron user records. All collection, use, disclosure, safeguarding, and retention of personal information are governed strictly in accordance with the <i>Protection of Privacy Act</i> (POPA), the <i>Access to Information Act</i> (ATIA), the <i>Libraries Act</i>, and the Library's Privacy Management Program (PMP). 1. PURPOSE To establish clear statutory rules governing the protection, confidential handling, limited disclosure, and secure disposal of personal information collected from library patrons, employees, volunteers, Board Trustees, and service providers. 2. SCOPE This policy applies to all personal information in the custody or under the control of the Library across all media and formats (physical paper records, Integrated Library System [ILS] databases, digital logs, emails, and video surveillance). In accordance with Section 1(h) of POPA, this policy binds all Library Board Trustees, paid employees, volunteers, practicum students, third-party contractors, and service providers acting on behalf of the Library. 3. POLICY PROVISIONS 1. Need-to-Know Access & Confidentiality • Strict Need-to-Know Access: Access to patron borrower records, digital resource usage, and account histories is restricted strictly to authorized staff, volunteers, and contractors who require the information to perform assigned operational duties (POPA s. 12(4)).			

- Oath of Confidentiality: All Trustees, staff, volunteers, practicum students, and contractors must sign a formal Declaration of Confidentiality prior to being granted access to library systems or physical staff areas.
- Patron Privacy Protections: Staff and volunteers shall not track patron visit frequencies, nor discuss individual reading habits, reference inquiries, digital resource use, or library activities with unauthorized parties.

2. Statutory Disclosure Authorities (POPA ss. 13 & 54)

Personal information under library custody or control will not be disclosed to any third party except under the following specific legal authorities:

1. Resource Sharing & Consistent Purpose: Shared with regional library partners (e.g., TRAC/ILS network) strictly for account management, interlibrary loans, fee recovery, or material retrieval (POPA s. 13(1)(b), s. 14).
2. Law Enforcement & Legal Process: Disclosed in response to a court order, warrant, subpoena, or formal written law enforcement request approved by the Library Director/Privacy Officer.
3. Imminent Health or Safety Threat: Disclosed when there are reasonable grounds to believe disclosure is necessary to avert or minimize an imminent danger to the health or safety of any individual (POPA s. 13(1)(cc)).
4. Parent/Guardian Access for Minors: Account details of cardholders under the age of 14 will be disclosed to a parent or guardian who has authorized and accepted legal financial responsibility for the child's borrowing privileges.

3. Collection Notices & Transparency (POPA s. 5(2))

Unless a statutory exception applies, a collection notice must be provided whenever personal information is collected directly from an individual. Collection notices must state:

- The specific operational purpose for the collection.
- The legal authority (POPA s. 4(c) and *Libraries Act*).
- Contact information for the Privacy Officer.

4. Records Retention & Decision Retention Rule (POPA s. 6(b))

- 1-Year Decision Retention Rule: If personal information is used to make a decision that directly affects an individual (such as suspension of privileges, fee waivers, exam proctoring verification, or employment decisions), the record must be retained for at least one (1) year after use to ensure the

individual has a reasonable opportunity to obtain access and request a correction.

- Transitory Records Disposal: Personal information no longer required for business or legal purposes, as well as temporary operational lists, must be promptly and securely destroyed. Physical paper records must be deposited into locked bins for certified destruction by the library's contracted paper disposal service.

5. Rights to Access & Correction (POPA s. 7 & ATIA)

- Right of Access: Patrons have the right to request access to their own personal information held by the Library (ATIA s. 11).
- Routine Updates vs. Formal Correction: Informal updates to contact information (e.g., address, phone number) are updated directly in the ILS. Formal requests to correct factual errors or omissions in historical records will be processed under Section 7 of POPA within 30 business days.

Approval

Signature



Nicole Starker Campbell
Board Chair