



Policy Title:	Privacy and Access to Information
Policy Type:	Public Service
Policy #:	PS 011-02
Policy Authority:	CEO
Effective Date:	May 2011

PURPOSE

This policy provides guidance in the protection of all personal information in its custody and its appropriate access. Please also refer to the policy on the Confidentiality of Individual Customer Records.

DEFINITIONS

“Personal information”: as defined in the Municipal Freedom of Information and Protection of Privacy Act, means 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;
- 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.

POLICY

The Clarington Public Library will make information about the Library available to the public, and will protect the privacy of all personal information in its custody in keeping with the access and privacy provisions of the [Municipal Freedom of Information and Protection of Privacy Act](#), (MFIPPA) and other applicable legislation.

GUIDELINES

ONLINE PRIVACY

When visiting the Clarington Public Library website, <http://www.clarington-library.on.ca>, personal information will not be collected unless the visitor chooses to use and receive online products and services that require it. Personal information will then only be used to provide the Library services and programs selected, and for no other purpose. In addition, the Library does not monitor or track what websites are visited when using library computers.

LOGGING PRACTICES

All Web servers automatically record Internet Protocol (IP) addresses of visitors to their sites. The IP address is a unique number assigned to every computer on the Internet. As well as recording the IP addresses of users, the Library's web server also keeps track of sites that users visited immediately prior to the Clarington Public Library's website and the search terms they used to find it. The web server keeps track of the pages visited on the Clarington Public Library's website, the amount of time spent on those pages and the type of searches done on them. Searches remain confidential and anonymous. The Library only uses this information for statistical purposes, to find out which pages users find most useful and to improve the website.

COOKIES

Cookies are electronic placeholders that are placed on computers by websites to track individual movements through that website over time. Cookies used by the Library are session based and therefore only last for the duration of the user's session. They are used by the Clarington Public Library website to keep track of user sessions in order to balance the usage of the Clarington Public Library's website on Library web servers. They are not tied to a specific identity – no identifiable personal information is stored by them.

EXTERNAL LINKS

Some of the Clarington Public Library's websites link to other sites created and maintained by other public and/or private sector organizations. The Library provides these links solely for information and convenience. When a user links to an outside website, the user leaves the Clarington Public Library website and the Library's information management policies no longer apply. The Library encourages users to read the privacy statement of each and every website visited before providing any personal information.

ELECTRONIC COMMUNICATION

If contacting Library staff using an e-mail address (e.g., *Ask Us! Service*), a discussion forum, library blog, text message or other electronic communication method, or if choosing to complete an online form provided on the Clarington Public Library website (e.g., *Suggestion Form*) users may be asked to provide name, e-mail address or other personal information.

The purpose of collecting this information is to allow staff to respond to enquiries or to evaluate individual web services. Only authorized staff will have access to the information provided and the information will only be used for the purpose it was intended.

ACCESS TO INFORMATION

GENERAL INFORMATION

General information on the operations of Clarington Public Library (the Library) is available on the Clarington Public Library's website and can be accessed free of charge. General information available on the Clarington Public Library's website includes the following:

- a. Clarington Public Library Board meeting minutes;
- b. Various Clarington Public Library policies;
- c. Information related to using Library services;
- d. Locations and hours of operation of library branches;
- e. Information related to collections development, fees and charges;
- f. Employment opportunities at Clarington Public Library.

PERSONAL INFORMATION

Personal information relating to material out on loan, is available online for those wishing to access it. All that is needed is a Library card barcode and a Personal Identification Number (PIN). A PIN is a security code that allows the Library to verify that a request to access an account is authorized. Once information is verified, personal information relating to material out on loan can be accessed on the Clarington Public Library website. A staff member will gladly assist, or instructions are available on the CPL website.

HOW TO MAKE A FORMAL ACCESS REQUEST

In addition to the information available on the CPL website, users have the right to access information about Library operations and other personal information the Library holds, all subject to the exemptions as contained in MFIPPA. Library staff will be happy to assist. Personal identity will need to be confirmed before being provided with access to personal information. Generally, the Library does not charge for providing information, but if the request requires significant staff time, the Library reserves the right to charge a fee for such requests as outlined in MFIPPA's Regulations.

The Library asks that all requests be in writing. An Access Request Form is available both on the CPL website and in all branches to fill out. When writing a letter rather than filling out a form please include the following:

- a. Full mailing address;
- b. Day telephone number;
- c. Names of specific files or types of records to which access is requested including specific dates of those records where possible. Please provide as much detail as possible.

All formal access requests will be directed to the Freedom of Information Coordinator, the Library Director, who will then review each request to determine if the Library will disclose the requested information. The Library Director will also receive and address all privacy complaints the Library receives.

The Library Director can be reached at:

Administration, Clarington Public Library
163 Church Street, Clarington, ON L1C 1T7
Phone: 905-623-7322 X 2702 Fax: 905-623-8608
E-mail: lkent@clarington-library.on.ca

Notice will be given if access is granted or denied to the records requested and to which exemptions apply.

RIGHT TO APPEAL AN ACCESS DECISION

Requesters of information can appeal the Library's decision about access to the Ontario Information and Privacy Commissioner (IPC). In order to make an appeal, an Appeal Form must be completed or a letter written, to the IPC's Registrar within 30 days of receiving the Library's decision. This correspondence must include a description of the circumstances of the request, a copy of the Library's decision, and, if available, a copy of the original access request to the Library. Include the appropriate fee as required by the IPC. Once the appeal request has been processed, the IPC will send a written confirmation, explaining whether the appeal will be:

- a. Handled through an informal mediation
- b. Handled through a formal inquiry by an Adjudicator; or
- c. Dismissed.

HOW TO CORRECT PERSONAL INFORMATION HELD BY THE LIBRARY

If it is believed that there is a mistake in the personal information collected, the user has a right to ask for it to be corrected. Documentation may be requested to show where the Library's files are incorrect. MFIPPA provides the right to request correction of personal information held by the Library if it is believed there is an error or omission. A statement of disagreement to the information reflecting any correction requested but not made by the Library may be attached. The Library will notify any person or organization to which personal information was disclosed within the year prior to a correction request and advise them about the correction or statement of disagreement.