

Personal Information Banks Policy

<i>Policy Number</i>	PMP-04
<i>Topic</i>	Privacy Management Program
<i>Authority</i>	Board
<i>Related Documents</i>	Protection of Privacy Act Access to Information Act Privacy Management Program Policy PMP-01

Wood Buffalo Regional Library (WBRL) maintains the following personal information banks in accordance with the Protection of Privacy Act (POPA) and Access to Information Act (ATIA).

WBRL protects personal information using reasonable administrative, technical, and physical safeguards to maintain confidentiality and prevent unauthorized access, use, disclosure, or destruction.

Personal information is collected, used, and disclosed only for the purposes of operating and delivering library programs and services, or as otherwise authorized under POPA.

Access to personal information banks is restricted to employees, volunteers, and authorized service providers on a need-to-know basis for the performance of their duties. All individuals with access to personal information are required to maintain confidentiality.

Privacy Impact Assessments (PIAs) are conducted in accordance with WBRL policy and POPA requirements where new or substantially changed programs, systems, or processes involve personal information, particularly where there is a risk of significant harm, use of sensitive data, or involvement of third-party service providers.

Records are retained and/or destroyed in accordance with the Records Retention Policy.

Registered Patron Records

- *Borrower records* in the integrated library system (ILS) may contain name, contact information, library card number, date of birth, guardian information (where applicable), date of registration, date of last activity, expiration date, items out, holds, and current/historical fines and fees.
- The ILS deletes records of items borrowed from the borrower record upon check in, unless the patron has opted to maintain those records.
- WBRL grants access to patron records per the Confidentiality of Patron Records Policy.
- Access to records: WBRL employees as required for job tasks Innovative Interfaces, Inc.

Customer Newsletters

- *Customer newsletter files* may contain name and email address.
- Access to records: WBRL Communications Coordinator, Constant Contact.

Customer Collection Accounts

- *Customer Collection Accounts* may contain name, contact information, library card number, date of birth, guardian information (where applicable), and balance owing.
- Access to records: WBRL Library Resources, Transworld Systems Canada.

BiblioCommons Account Records

- *BiblioCommons Account Records* on the BiblioCommons server contains name, month of birth, year of birth, email address, library card number and membership expiry date, items charged out, current holds, cancelled and expired holds (six months only), borrowing history (six months only and is user opt-in model), preferred hold pickup location, BiblioCommons username, patron generated lists, comments, and ratings.
- Access to records: BiblioCommons.

Volunteer Records

- *Volunteer files* may contain the name, contact information, and Vulnerable Sector Check (VSC) of WBRL volunteers, the volunteer's application form, a signed copy of the volunteer agreement, and notes from evaluations and meetings.
 - Location: Securely in the volunteer cabinet or electronically.
- Access to records:
 - The Volunteer Coordinator, the Human Resource Generalist, and the volunteer's supervisor have access to volunteer records.
 - Volunteers may have access to their file at any time.

Employee Records

- *Hard copy personnel files or electronic employee records* may contain employee name, contact information, resume, Social Insurance Number, earnings and Income Tax Records, offer of employment, salary grid placement, benefit plans, vacation status, sick leave, performance appraisals, evaluations, training certificates earned, correspondence, letters of discipline, and emergency contact information.
 - Location: Securely in the Administration Office (hard copy files) or electronically.
- Access to records:
 - The Director and the Human Resources Generalist have access to employee records. The Board Chair has access to the Director's records.
 - The Finance Associate has access to some information contained in employee records for financial purposes at the discretion of the Director.
 - Managers/Supervisors may request access to employee records to perform an employee evaluation or enter a comment. The Human Resources Generalist grants access to records at their discretion.
 - Employees may inspect and challenge documents in their record at any time.
 - The Human Resources Generalist or designate must be present when any employee's record is accessed.

The Human Resources Generalist informs employees when documents are added to or deleted from their records.

Employee Schedule

- *Employee schedules* may contain name, contact information, dates of service, and positions held.
- Access to records: WBRL employees.

Board Member Records

- *Board member records* may contain name, contact information, dates of service, date of birth, relevant employment information and positions held.
- Access to records: Director.
 - Location: Securely in the Director's Office (hard copy files) or electronically.

Donor Records

- *Donor records* in the fund development database may contain name, contact information, donation amounts, services funded, and funding dates.
- Access to records: Director and System Administrator.

Financial Records

- *Financial records* in the financial accounting database (Sage) may contain vendor name, contact information, business address, email address, financial amounts owing/paid.
- Access to records: WBRL Administration.

Personal Information Banks Schedule

PIB NAME	Description of Information	Purpose/Use	Authority	Location	Access	PIA Required?
Registered Patron Records (ILS)	Name, contact info, library card #, DOB, guardian info, activity, borrowing data	Deliver core library services	POPA – service delivery	ILS (Innovative Interfaces, Inc.)	Staff (need-to-know); vendor	Yes
Customer Newsletters	Name, email	Communications	POPA – service communication	Constant Contact	Communications Coordinator; vendor	No
Customer Collection Accounts	Name, contact info, DOB, account balances	Fee collection, material recovery	POPA – program administration	Internal + Transworld Systems Canada	Staff; collection agency	Yes
BiblioCommons Account Records	Name, DOB (partial), email, borrowing activity, lists, usage data	User experience, discovery tools	POPA – service enhancement	BiblioCommons servers	Vendor; limited staff	Yes
Volunteer Records	Name, contact info, VSC, evaluations	Volunteer management	POPA – program administration	Secure cabinet / electronic	Volunteer Coordinator, HR	Yes
Employee Records	SIN, payroll, evaluations, health/leave info	HR and employment administration	POPA – employment administration	HR systems / Admin Office	Director, HR, limited staff	Yes
Employee Schedule	Name, contact info, schedules	Staffing operations	POPA – operations	Scheduling system	Employees (as required)	No
Board Member Records	Name, contact info, DOB, employment info	Governance	POPA – governance	Director’s Office / secure systems	Director,	Conditional
Donor Records	Name, contact info, donation amounts	Fund development	POPA – program support	Fundraising database	Director, Sys Admin	Conditional
Financial Records	Vendor info, payment records	Financial operations	POPA – financial admin	Sage system	Admin staff	No

History

Created: November 18, 2020.

Revised: January 19, 2022. September 20, 2023. May 27, 2026