

Sara Brown
Week 11

Implementing a Privacy Checklist in My Library

I evaluated the Library Privacy Checklist - Overview since I do not work with vendors.

Steps:

1. Develop questions about website privacy policy (attached)
2. Develop questions about circulation manual privacy information (not included since it is internal)
3. Evaluate, to the best of my knowledge and based on available documentation, how the library currently does or does not meet each Priority (see attached chart)
4. Determine what departments/people should be contacted with each question/concern
5. Ask questions of relevant departments/individuals
6. Update chart to record how the library performs in each sub-section of each priority (fully, partially, not at all, unknown)

Questions:

These are questions I have about the web privacy policy. Italics are mine for emphasis. These are excerpts of the policy followed by my questions with a bullet point. The full policy is attached.

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- What is the justification for/necessity of collecting each piece of information stated? How does collecting links and date/time of visit as stated above help with navigation and improving the website?

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- How is “appropriate” defined here?

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- Does this include reference questions submitted through the website? What about customer account questions? We get both through email and LibAnswers.

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- What privacy protections are in place here? Who does the monitoring? Are they monitoring generally or looking for specific terms/actions?

ALA Priorities	Web Privacy Policy	Circulation policy (internal)
Priority 1 Actions		
1. Create a policy that addresses the collection of patron information. Such a policy should specify that the library is not collecting more patron information than what it needs and that it is not keeping the personally identifiable information of patrons longer than what is necessary.	Amount collected and time kept partially addressed	No public policy about circulation records appears to exist
a. Create a privacy policy that is understandable by a layperson.	Some parts have a lot of legal terminology	N/A since not public
b. Make sure the privacy policy is posted in the library where the public can see it.	Website policy is online only	Nothing publicly posted. Board of Library Trustees policy given upon request.
c. Ensure that the privacy policy includes information about what information the library is tracking, why, and for how long the data is kept.	Why and timeline not addressed in most cases	Relevant documentation not found
d. Ensure that the privacy policy includes when patron information can be shared and under what conditions.	Web use addressed	Partially addressed in internal circulation manual as well as Memo #2015-023
2. Destroy all paper records with user data, such as computer sign-in sheets.	N/A (computer sign-on is digital)	Policy not found. Informally, branch shreds such documentation
3. Ensure all existing security certificates for HTTPS/SSL are valid and create a procedure for revalidating them annually.	Procedure unknown	N/A
4. Designate a Library Privacy Officer to handle requests for personally identifiable information of patrons from law enforcement officials and other	Does not exist	

third parties.		
Priority 2 Actions		
1. Ensure there is a formal process in place to address breaches of patron data directly under library control or maintained by third parties. The library should notify affected users when they become aware of a breach.	Existence of process/procedure unknown	Existence of process/procedure unknown
2. Encrypt all user data with secure algorithms in all network and application communications.	Unknown	Unknown
3. Purge search history records regularly, ideally when the individual computer session ends.	Unknown	N/A
4. Purge circulation and interlibrary loan records when they are no longer needed for library operations. Any patron data that is kept for analysis should be anonymized or de-identified and have access restricted to authorized staff.	Unknown for web use data	Unknown
5. Utilize HTTPS wherever possible.	Unknown	N/A
6. Ensure that the privacy policy is updated often and schedule regular times for its review. Unknown	Unknown	Unknown
Priority 3 Actions		
1. Publish and distribute flyers and/or web content for patrons that includes information on how to protect personally identifiable information and other data.	Do not exist on system level	
2. Publish and distribute flyers and/or web content for patrons about available software and alternative browsers and plugins to protect their	Do not exist on system level	

privacy online and can be used in the library.	
3. Publish and distribute flyers and/or web content about VPN services and/or Tor and patrons' ability to use these systems on the library network.	Do not exist on system level
4. Test compliance with these standards through a trusted third party service or individual.	Unknown

From <https://www.bcpl.info/about-us/policies.html>

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