

Policy 11.0 Protection of Privacy & Record Management

Libraries Regulation 141/98:

7(1) *Subject to section 40 of the Act, every board shall establish policies with respect to the following:*

(a) *confidentiality of user records, except where disclosure is required by law*

11.1 Records Management

The official management of Library records is outlined in Privacy Management Plan (PMP) found in schedules

11.2 Privacy Management Plan (PMP)

- In alignment with the Protection of Privacy Act (POPA), OML will maintain a Privacy Management Plan.
- The Privacy Management Plan will be updated as required in alignment with POPA. (Schedules).
- All board, staff, and volunteers will receive training in alignment with the PMP.

April 15, 2026

Chair's Signature

Date Last Affirmed or Approved Update

Library Patron Code of Conduct

Purpose

The Olds Municipal Library strives to provide a welcoming, inclusive, and safe environment that supports reading, learning, creativity, and community connection. This Code of Conduct outlines expectations for all who use the Library's spaces, collections, and services.

1. Respect for People

Everyone in the Library, patrons, staff, and volunteers, has the right to be treated with respect and dignity. To maintain a positive atmosphere:

- Speak and act respectfully toward others.
- Avoid disruptive, intimidating, harassing, or discriminatory behavior.
- Follow staff instructions promptly and courteously.
- Respect the rights of others to quiet study, work, or recreation.
- Children under 10 must be accompanied by a responsible caregiver if attending the library for longer than two hours.
- Alcohol, drugs, and smoking (including vaping and cannabis) are prohibited on Library premises.
- Only service animals, as defined by Alberta's Service Dogs Act, or approved program animals are permitted.

Harassment, threats, or physical violence toward staff or other patrons will not be tolerated and may result in immediate removal from Library property and loss of privileges.

2. Respect for Space

The Library's facilities, furniture, technology, and materials are shared community resources. Please:

- Use bicycles, scooters, or similar devices only outside the building.
- Dispose of garbage and recyclables properly.
- Refrain from eating or drinking near computers or other electronic devices.
- Follow any staff direction during emergencies or closures.

3. Respect for Collections

The Library's collections and equipment are for community use. Patrons must follow the borrowing agreement if borrowing library materials.

- Handle all materials carefully.
- Return or renew borrowed items on time.
- Pay all penalties if items are returned late, damaged, or not returned.
- Use computers and Wi-Fi in accordance with the Library's Internet Access Policy.
- Respect copyright and licensing agreements.

4. Consequences for Non-Compliance

Failure to follow this Code may result in:

- A verbal or written warning;
- Temporary or permanent suspension of Library privileges at the discretion of the Library Manager or staff.
- Trespass notice or referral to law enforcement, if necessary.
- Suspensions may be appealed in writing to the Library Manager within 10 business days.

Privacy Management Plan (PMP)

Purpose

The Olds Municipal Library (OML) is governed by the Protection of Privacy Act (POPA) of Alberta and is committed to the privacy of personal information that is in the custody or control of the Library. OML will only collect personal information if the information is necessary for employment records and purposes, an operating program, or activity of the library.

Scope

This PMP applies to all OML employees, volunteers, board members, contractors, and any agent providing service on behalf of the Library. This PMP is applicable to all personal information in the custody or control of the Library, regardless of the medium or form.

Definition: (MIN) refers to Ministerial Regulation

Designation of a Head and Privacy Officer *POPA Section 6(1)a (MIN)*

- The Library Board shall be considered the Head of the organization in reference to POPA.
- The Library Manager will be assigned the role of the privacy officer and is responsible for compliance with the *Protection of Privacy Act (POPA)*.
- Tasks related to duties and authorities as outlined in *Delegation Table* may be assigned to trained staff members.

Gathering of Personal Information Section 6(2) iv (MIN), Section 5(2)

Consent to Gather Personal Information

OML will require written or electronic consent for the gathering of personal information. If the information is to be used to make a decision that directly affects the individual, the outlet will retain the records for one year, or the amount of time agreed to in writing by

- The individual
- The Library Manager, or the “Head”
- The Outlet Library Records Retention Schedule

Manner of Collection

OML will collect personal information directly from the individual the information is about. A collection notice will be provided at the time of collection and can be provided either in writing, digitally, or verbally during an in-person conversation. The collection notice will include:

- The purpose for which the information is collected
- The specific legal authority for the collection
- The contact information to which the individual may direct the individual’s questions about the collection

Correction of Personal Information *POPA Section 7*

An individual who believes there is an error or omission in their personal information held by the library may request that their information be corrected, in accordance with guidelines outlined in Section 7 of the *POPA*.

Notification of Incident or Loss of Personal Information *POPA Section 10(2)*

If an incident occurs involving the loss of, unauthorized access to, or unauthorized disclosure of personal information in the library's custody where there is real risk of significant harm to an individual as a result of that loss, the outlet library will give notice to

- the individual
- Parkland's Privacy Officer
- the Commissioner
- the Minister

Request for Review *Section 38(2)*

If OML receives a complaint regarding personal information, the individual must first allow the library up to 30 business days to respond. If the library does not respond within that time, or if the individual is not satisfied with the response, they may request a review by the Commissioner.

Creation, Use, and Disclosure of Personal information *Section 6(1) ii (MIN)*

OML may create and use non-personal data for statistics to assist in decisions about member library services but will ensure that individuals cannot be re-identified.

Personal Information in Automated Systems *Section 6(1) iii (MIN)*

OML does not use automated systems to generate content or make decisions, recommendations, or predictions.

Administrative, Technical, and Physical Safeguards and Security Classification

Section 6(2) b (MIN), Section 6(1) c (MIN)

- *Administrative Safeguards:* OML will restrict access to personal information to those who need it for the regular duties of their employment.
- *Physical Safeguards:* Personal information will be locked in regular or fire-proof filing cabinets depending on the Security Classification of the information.
- *Technical Safeguards:* OML will employ firewalls and restriction as administered by Parkland Regional Library to electronic access to personal information within the SuperNet.

Security Classification System

High-sensitivity information is defined in the (Ministerial) Regulations to include personal information related to biometric, financial, or personal information regarding a minor, senior, or vulnerable individual. Any high-sensitivity information will be protected with additional safeguards.

Mandatory Training and PMP Review *POPA Section 6(1) d & e (MIN)*

- OML staff will receive the POPA certified training and procedures surrounding these policies.
- OML Staff and Board will be required to refresh their knowledge of the PMP and responsibilities under POPA annually.
- Volunteers will receive training about POPA policies relevant to their position and duties from their supervisor.

Privacy Impact Assessments *POPA Section 7(1) (MIN)*

OML will conduct a Privacy Impact Assessment (PIA) whenever there is new or changes to any administrative practice, program, project, or service that will involve the collection, use, or disclosure of personal information if one or more of the following apply:

- the loss of personal information could result in significant harm
- one or more of the factors requiring the submission of a PIA to the Commissioner apply. See POPA Section 7(5) (MIN)

OML will submit a copy of any PIA to the Commissioner, if required by guidelines outlined in the Ministerial Regulation (MIN) or by specific request of the Commissioner.

A Privacy Impact Assessment will:

- include a summary of the purpose of the collection, use, or disclosure of personal information for the new, or substantial change to an existing, administrative practice, program, project or service
- identify the types of personal information that will be collected, used or disclosed and reasonable security arrangements in place to protect that personal information.
- identify the legal authorities for the collection, use, or disclosure of the personal information
- identify of any privacy risks and mitigation strategies respecting the personal Information
- identify the administrative, physical, and technical safeguards in place to protect the personal information
- describe accuracy, correction, and retention procedures that will be implemented to ensure the personal information is accurate and complete

Completed PIAs will be retained for six years. See Records Retention Schedule.

Delegation by Head of Public Body Section 55

As designated by the Protection of Privacy Act Delegation Tables

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POPA Delegation Table

Duty, power or function of Head	Section reference	Retained by Head	Delegated to Privacy Officer
Collection, Correction, Protection of Personal Information			
Authority to set aside collection requirements	5(3), (4)	X	
Authority to decide on requests for correction of personal information	7(1)		X
Duty to correct, annotate or link personal information, duty to notify previous recipients	7(3), (4)		X
Duty to give notice to individual requesting correction	7(7)		X
Authority to transfer a request for correction	8		X
Duty to ensure protection of personal information by making reasonable security arrangements	10(1) Regulation 2,3	X	
Duty to notify the affected individual when there exists a significant risk of harm	10(2) Regulation 4	X	
Duty to ensure protection of data derived from personal information	20		X
Duty to ensure protection of data derived from non-personal data	24	X	
Use and Disclosure of Personal Information			
Establishing rules for electronic consent	Regulation 2(4)(a)	X	
Establishing rules for oral consent	Regulation 2(5)(a)	X	
Authority to disclose to guardian of a minor	54(1)(e)		X
Authority to disclose to relative or adult interdependent partner of deceased individual	13(1)(s)		X
Authority to disclose to avert imminent danger to health or safety	13(1)(cc) Regulation 1(1)(b)		X
Authority to approve conditions for disclosure for research and statistical purposes and for administration of research agreements	15	X	
Reviews and Complaints			
Authority to ask the Commissioner for advice	28(1)		X
Authority to require Commissioner to examine original record on site	29(4)	X	

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Right to make representations to the Commissioner	41(6),(8)	X	
Duty to comply with Commissioner's Order	44	X	
General Provisions			
Duty to publish a directory of the body's personal information banks and keep it current	57(2),(5)		X
Duty to record uses or disclosures of personal information not included in directory	57(4)		X
Establishing controls over the collection, use, and disclosure of personal information	2(a)		X
Authorizing routine correction of personal information	2(b)		X
Ensuring authorized purpose of collection	4		X
Assuring proper collection and notification	5		X
Assuring accuracy of personal information	6(a)		X
Applying retention standards	6(b)		X
Use and Disclosure of Personal Information			
Assuring appropriate uses	12		X
Assuring appropriate purposes of data matching	17		X
Assuring appropriate uses of data derived from personal information	18		X
Assuring appropriate purposes of disclosure of data derived from personal information	19		X
Assuring appropriate purposes for creation of non-personal data	21 Regulation 5(1)		X
Assuring appropriate use and disclosure of non-personal data	22, 23 Regulation 5(2)		X