
PRIVACY, ACCESS TO INFORMATION, AND RECORDS GOVERNANCE

Title: Privacy, Access to Information, and Records Governance	Policy Number: PRIV-GP-01
Oversight: Board of Directors	Approved: May 20, 2026
Statutory: Yes	Last Revision: n/a
Legislative Authority: Protection of Privacy Act, Access to Information Act	Last Review: n/a
	Next Review: May 20, 20, 2029

POLICY STATEMENT

The Library is committed to protecting personal information, ensuring appropriate access to information, and managing records in accordance with the Protection of Privacy Act (POPA), the Access to Information Act (ATIA), and other applicable legislation.

The Library will maintain a comprehensive Privacy Management Program (PMP) to support compliance, accountability, transparency, and the responsible stewardship of information.

PURPOSE

The purpose of this policy is to establish governance principles and accountability for:

- the collection, use, disclosure, protection, retention, and disposition of personal information;
- access to records and information;
- records management practices; and
- the implementation and oversight of the Library’s Privacy Management Program.

SCOPE

This policy applies to:

- all records and personal information in the custody or control of the Library, regardless of format or location; and
- all individuals acting on behalf of the Library, including employees, volunteers, contractors, library board members, students, consultants, and service providers.

DEFINITIONS

Personal Information: Recorded information about an identifiable individual as defined under the *Protection of Privacy Act (POPA)*. This includes any information that can be used to identify an individual, either on its own or in combination with other information.

Privacy Breach: The loss of, unauthorized access to, or unauthorized disclosure of personal information in the custody or control of the Library.

Privacy Management Program: A framework of policies, procedures, roles, and practices established by the Library to ensure compliance with privacy legislation and to support the responsible management of personal information

Privacy Officer: The individual designated by the Chief Executive Officer (CEO) to oversee the Privacy Management Program, support compliance with privacy legislation, and act as a point of contact for privacy-related matters.

Record: Information created, received, or maintained by the Library in any format as evidence of activities, decisions, or transactions

POLICY PRINCIPLES

Legislative Compliance: The Library will comply with all applicable privacy and access to information legislation, including the Protection of Privacy Act (POPA) and the Access to Information Act (ATIA).

Accountability and Governance: The CEO is responsible for ensuring the Library maintains a Privacy Management Program and complies with this policy and applicable legislation. The Library will establish appropriate administrative procedures, schedules, safeguards, and operational practices to support compliance.

Collection, Use and Disclosure of Personal Information: The Library will collect, use, and disclose personal information only:

- as authorized by law;
- for purposes related to Library programs, services, operations or legal obligations; and
- to the extent necessary to fulfill those purposes.

The Library will provide notice regarding the collection of personal information where required by legislation.

Access to Information and Correction Rights: The Library recognizes individuals' rights under applicable legislation to:

- request access to records;
- request correction of personal information; and
- request review of decisions through the Office of Information and Privacy Commissioner.

The Library will establish processes to respond to such requests within legislated timelines.

Privacy Complaints: The Library will establish processes for receiving, investigating, documenting, and responding to privacy complaints in a fair, timely, and transparent manner.

Records Management: The Library will create, maintain, retain, archive, and dispose of records in a consistent and systematic manner that:

- Supports operational, legal, financial and historical requirements;
- Protects the integrity and reliability of records; and
- Supports compliance with applicable legislation.

Retention and Disposition: Records will be retained and securely disposed of in accordance with approved records retention schedules and applicable legal requirements. The destruction of records will be suspended where records are subject to legal hold, investigation, audit, or other legal requirement.

Protection and Safeguarding of Information: The Library will implement reasonable administrative, physical, technical, and operational safeguards to protect records and personal information from unauthorized access, use, disclosure, alteration, loss, or destruction.

Privacy by Design and Risk Management: Privacy considerations and risk assessment will form part of the development, procurement, implementation, or modification of programs, technologies, systems and services involving personal information.

Privacy Breach Management: The Library will establish procedures for identifying, reporting, documenting, and responding to privacy breaches, including notification and reporting obligations under applicable legislation.

RESPONSIBILITIES

Board of Directors

- Approve this policy and review every three (3) years or more often as required;
- Provide governance oversight regarding privacy, access to information, and records-related risk; and
- Receive reports regarding significant compliance matters, privacy breaches, and legislative risk.

Chief Executive Officer (CEO)

- Ensure compliance with applicable legislation and this policy;
- Establish and maintain the Privacy Management Program;
- Designate a Privacy Officer;
- Establish administrative procedures, schedules, and operational controls;
- Ensure appropriate training and compliance monitoring; and
- Report significant risks and compliance matters to the Board.

Privacy Officer

- Support implementation and maintenance of the Privacy Management Program;
- Support compliance monitoring and risk management; and
- Oversee privacy-related compliance activities delegated by the CEO.

Staff, Volunteers, and Representatives

- Comply with this policy and related procedures
- Complete required privacy training; and
- Report privacy incidents, breaches, or records-related concerns promptly.

DELEGATION

The CEO is authorized to establish, implement, amend, and maintain administrative procedures, schedules, forms, standards, and operational practices necessary to support this policy and ensure compliance with applicable legislation.

RELATED DOCUMENTS

Privacy Management Program Manual
Records Retention and Disposal Schedule
Personal Information Bank Directory

REVISION HISTORY

Version	Date	Description of Change	Approved By
1.0	May 20, 2026	Initial approval of Policy	Board