

# Privacy Policies Implementation Team

Final report – February 4, 2016

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## Background

The Privacy Policies Implementation Team was charged by the Library Executive Committee on June 8, 2015. (See *Appendix 1*.) The committee's original deadline for completing its tasks was July 31; the EC approved an extension to August 31; later this deadline was extended to the end of the year and the group thanks EC for the additional time in order to complete the work. Members are: Melody Allison, Jim Dohle, Tom Habing, Lisa Hinchliffe, Karen Hogenboom (starting October) Lynne Rudasill, and Sue Searing (ending September). Sue Searing chaired the committee until her retirement in September; Karen Hogenboom and Tom Habing were co-chairs after that time. The team continued the work begun by the Privacy Policies Working Group.

## Summary of Recommendations

1. Through the Library's website, provide users and staff with a consolidated view of and searchable platform for all relevant Library policies regarding privacy, confidentiality, and security of personal data.
2. Maintain a PDF version of each policy as the "official" version.
3. Adopt a set of principles (see *Appendix 2*) to govern the creation and revision of policies related to privacy, confidentiality, and personal data security.
4. Adopt a standard template for privacy-related policies. Convert existing policies to the Privacy Policy Template format. (See *Appendix 3*.)

5. Designate a member of the Library Administration to provide oversight of all Library privacy, confidentiality, and personal data security policies, practices, and issues; and to lead / coordinate a comprehensive “privacy audit” as recommended in the ALA Privacy Toolkit.
6. Identify the “owner” and the “approving authority” for each policy, current and future.
7. Regularly review all policies, following the schedule provided in the Privacy Policy Review Matrix. (See *Appendix 4*.)
8. Use the Privacy Policy Review Rubric to conduct the review of policies. (See *Appendix 5*.)
9. Create additional policies to cover areas not addressed by current policies. (See “recommended policies” in *Appendix 4*, the matrix.)
10. Create a forum for ongoing discussion of privacy, confidentiality, and personal data security in libraries.
11. Develop programs to educate users about Library privacy policies and practices, as well as broader issues of personal data privacy and security.
12. Continue to monitor trends in privacy standards and library practices, modify our practices as appropriate, and consider proactive unilateral and collaborative initiatives to foster privacy in library (local and global) digital environments.
13. Assess the overall management of Library policies and institute more robust knowledge management practices.

## Detailed Recommendations, with Discussion

1. Through the Library’s website, provide users and staff with a consolidated view of and searchable platform for all relevant Library policies regarding privacy, confidentiality, and security of personal data.
  - a. Create a landing page which includes links to:
    - i. The University web privacy policy
    - ii. The Library’s overarching privacy policy
    - iii. All Library policies related to privacy, confidentiality, and personal data security for specific services or resources via searchable platform
    - iv. Links to relevant policies of third-parties that collect personal data about Library users.
  - b. Place a link to the landing page in the footer of all Library pages.

*Discussion:* The team was charged to “consider and make recommendations on the Library’s role in educating our users about the privacy and security of their library records.” Currently the Library home page links, through its footer, to the Vice President for Academic Affairs’ (VPAA) Web Privacy Notice ([http://www.vpaa.uillinois.edu/policies/web\\_privacy.cfm](http://www.vpaa.uillinois.edu/policies/web_privacy.cfm), one click from the home page) and through our Library Policies & Procedures Index to the University Library Privacy Policy ([http://www.library.illinois.edu/administration/services/sub\\_policies/p\\_privacy.html](http://www.library.illinois.edu/administration/services/sub_policies/p_privacy.html), four clicks from the home page). It would be better to present a consolidated view of all policies related to privacy. This also provides a means for alerting users to third-party policies. (See *Appendix 6* for a mock-up of the proposed landing page.)

Relatedly, we recommend providing users and staff with a consolidated view of and searchable platform for *all* library policies. (See *Summary of Recommendations* and *Detailed Recommendations, with Discussion # 13.*)

2. Maintain a PDF version of each policy as the “official” version.

*Discussion:* While the Privacy Policy Template requires that a complete history of origin, revisions, approvals, and expiration be included in every policy, confusion results when a web page’s “last updated” date is misinterpreted. Further, a web page can be modified without approval from a policy’s owner or approving authority. Therefore,

- The official version of the policy should be maintained as a searchable PDF document.
- The PDF should be downloadable from the policy’s web page.
- Maintain previous versions in a central location for historical reference and accessible via a searchable platform

3. Adopt a set of principles (see Appendix 2) to govern the creation and revision of policies related to privacy, confidentiality, and personal data security.

*Discussion:* Privacy principles are important in order to provide a somewhat comprehensive set of guidelines that apply to all library policies. These principles should help to ensure that as policies are revised and developed that they are consistent with each other in content and level of detail, though no two policies will be alike. Appendix 2 contains the principles recommended for EC adoption.

4. Adopt a standard template for privacy-related policies. Convert existing policies to the template format. (See *Appendix 3.*)

*Discussion:* We reviewed a sample of policies, which had been identified by the earlier Privacy team, in order to understand how much effort will be involved in ongoing reviews, as well as to develop a review rubric. This exercise brought home the extreme diversity of policy language and formats. We therefore recommend the adoption of a standard policy template for the sub-set of policies governing privacy, confidentiality and data security. Such standardization will make such policies more comprehensible to users and staff, and will make it much easier to conduct periodic reviews and updates. A proposed template is presented in *Appendix 3.*

Furthermore, we recommend using this template, or a refinement of it, for ALL library policies.

5. Designate a member of the Library Administration to provide oversight of all Library privacy, confidentiality, and personal data security policies, practices, and issues; and to lead or coordinate future privacy audits as recommended in the ALA Privacy Toolkit.<sup>1</sup>

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<sup>1</sup> <http://www.ala.org/advocacy/privacyconfidentiality/toolkitsprivacy/Developing-or-Revising-a-Library-Privacy-Policy#privacyaudit>

*Discussion:* Although we do not have a recommendation for who this person should be, the team agreed that someone should be appointed as the single point of contact for issues related to privacy. We believe this would provide for accountability and a more centralized approach to policy development, maintenance, and review. This person would not necessarily be responsible for the content of policies, but they would be responsible for ensuring that policies are regularly reviewed, that staff and patrons are aware of the policies, and that the policies are easily accessible. When revisions or new policies are required this “policy czar” would be responsible for coordinating the effort.

While not reaching consensus, the team discussed a number of possibilities for this responsibility, such as a part-time Assistant to the Dean position, incorporating this duty into the responsibilities of the AUL for User Services, or assigning the duties to a member of EC or to an EC-appointee. In any case, the team felt this responsibility was best served by a dedicated person from the administrative realm who has authority as well as responsibility for managing privacy policies and thus, while not specifying a particular position, recommends against an EC or EC-appointee.

The team felt that periodic privacy audits as described in the ALA Privacy Toolkit and coordinated by the “policy czar” would be useful to examine how the Library collects, stores, shares, uses, and destroys information about library patrons and employees. This audit would provide information about areas such as:

- Current privacy policies,
- Potential and known areas that could lead to privacy breaches, and
- Consistencies and inconsistencies of policies and practices.

The results of future audits will provide a foundation to:

- Identify and diminish privacy breaches where feasible,
- Identify opportunities for user consent (opt-in / opt-out),
- Identify ways to inform users about what types of data we collect, what we preserve, how we use such data, who has access, how we protect it, what we control and what we don’t – especially ways to do so at point-of-need,
- Identify where new policies are needed, and
- Support our promises with our practices.

An additional role for this person is to keep abreast of the broader privacy universe – campus, professional, global; become fluent with related issues; participate in privacy discussions locally and globally on how to best conform to current professional privacy guidelines and advocate for same locally (e.g., vendor agreements) and globally. (See *Summary of Recommendations* and *Detailed Recommendations, with Discussion # 12.*)

6. Identify the “owner” and the “approving authority” for all policies, current and future.

*Discussion:* All policies should clearly indicate an “owner,” i.e. the unit or body responsible for writing the policy and revising it. The owner should be a position, Library unit, or standing committee, but not an individual person as we should not assume that a given person will always be in a particular role. All policies should be approved before taking effect and clearly indicate the “approving authority.” Typically, approval is the responsibility of the Executive Committee, the Administrative Council, or the University Librarian/Dean.

7. Regularly review all policies, following the schedule indicated in the Privacy Policy Review Matrix. (See *Appendix 4*.)

*Discussion:* Policy review will be initiated by the designated member of library administration in collaboration with the policy's owner, and revisions must be approved by the approving authority. Every policy should have a regular review cycle, even if the result is simply to affirm the policy without revisions. The committee made its best estimation at appropriate review cycles, but these may need to be modified in the future. The changing landscape for privacy, confidentiality and data security in academic libraries and society in general suggest a fairly frequent review cycle. Off-cycle reviews may be prompted by court rulings, changes to University policies, new technologies, etc.

8. Use the Privacy Policy Review Rubric to conduct the review of policies. (See *Appendix 5*.)

*Discussion:* By using a common outline for the Policy Template and the Policy Review Rubric, we hope to make the review process as simple as possible. The criteria in the rubric were field-tested against five of the existing policies identified as relevant by the earlier Privacy Policies Working Group and were refined based on that experience.

9. Create additional policies to cover areas not addressed by current policies. (See *Appendix 4*, the matrix.)

*Discussion:* The team was charged to “identify gaps in current policy and practice regarding privacy and engage in the development of new policies, guidelines and best practices.” Gaps were identified and the following policies are recommended for development:

- Internal Library Systems
  - Illinois Researcher Connections, using the Elsevier Pure system
  - EZProxy
  - Email correspondence with Library patrons
  - Graduate assistant job application database
  - JOYCE, the hourly employee tracking system
  - The Illinois Data Bank run by the Research Data Service
  - MINRVA, the Library's mobile application
  - Easy Search
  - Journal and Article Locator
  - Public copiers/scanners with internal computer hard drives in the Library
  - Physical spaces used for reference consultations
- External Systems
  - HireTouch job application system
  - Third-party library vendors
  - Google Docs
  - Google Gmail

For internal Library systems, the system owners, working with the previously described policy czar should be responsible for developing the privacy policy for their systems with the

expectation that the policies will conform to the principles, rubrics, and templates described in this report.

For external systems, the policy czar should ensure that the policies are identified and linked to as appropriate, or they may work as the Library's advocate when working with third-parties to develop missing policies.

As new policies are developed or identified to fill gaps, the policy czar should make sure that the privacy policy matrix is kept up-to-date.

10. Create a training/development forum for ongoing discussion of privacy, confidentiality, and personal data security in libraries.

*Discussion:* Privacy and personal data security are areas where policies, law, and best practices are rapidly evolving, both within the academic library world and in society generally. It would be useful to periodically review the landscape and provide opportunities to share new knowledge and opinions with the Library faculty and staff.

11. Develop programs to educate users about Library privacy policies and practices, as well as broader issues of personal data privacy and security.

*Discussion:* There are different levels of possible user training. Fundamental to any user education will be a robust program of staff training, for example, as part of graduate assistant training and in division meetings. User instruction on privacy is likely to be most effective when embedded in the context of existing instructional programs, bringing nuance and perspective to topics already discussed, or during typical service transactions, for example, at the reference desk explaining that the computers do not keep track of what you have searched. The Undergraduate Library has a standard approach to developing LibGuides on a wide range of contemporary topics and issues ([http://guides.library.illinois.edu/sb.php?subject\\_id=70304](http://guides.library.illinois.edu/sb.php?subject_id=70304)) and we recommend that they consider developing a guide on privacy, which would include information on libraries and privacy but be broader in scope.

12. Continue to monitor trends in privacy standards and library practices and modify our practices as appropriate and consider proactive unilateral and collaborative initiatives to foster privacy in library digital environments.

*Discussion:* As the team work progressed it became apparent that due to the massive change from print to digital resources, the scope of library privacy issues is much more complex both locally and globally. Due to these new complexities there is a growing movement to identify and mitigate privacy breaches found in various venues, both in libraries and generally. This is especially important to include in our efforts as privacy is a core value of libraries. Our users expect that we are protective of their privacy and may extrapolate that idea of our protection to all aspects of library operations, services, and resources – physically and electronically. For these reasons it is imperative that we do what we can to foster the privacy of user (and employee) information. Where it is impossible we should make the user aware of such and provide opt-in or opt-out options as feasible. Though a global unifying privacy policy across the Library and all of its vendors may not be currently possible, we can remain vigilant for new developments that in

future may make a global resolution possible. Joining or leading coalitions and collaborations with organizations with similar goals can be one way of doing this, as is being an advocate for same. As an example, the team considered recommending that the Library sign the “Library Digital Privacy Pledge” (<http://go-to-hellman.blogspot.com/2015/07/the-library-digital-privacy-pledge.html>). However, the team felt that several provisions of the pledge would be problematic.

Privacy issues are an area of focus among the LIS and IT professions at the present time. Because conversations about problems and proposed solutions are ongoing, the Library should monitor the trends carefully before adopting a public stance.

13. Assess the overall management of Library policies and institute more robust knowledge management practices.

*Discussion:* Our attempts to bring better control and oversight to the Library’s policies about privacy and confidentiality brought into focus a larger problem with lack of control and inconsistent access to policies and procedures. We strongly encourage the Library Administration to designate a “policy czar” to assess the current state of policy information management and institute a new approach. For instance, a single, login-accessible Library policy manual for staff and a separate, open policy website for users could replace the current Library Policies and Procedures Index at <http://www.library.illinois.edu/administration/services/policies/>, which mixes internal and user-facing policies and is incomplete. (See *Appendix 7, Selected Examples of Policy Templates, Portals, Platforms, and Repositories for Six Academic Institutions.*)

**Appendix 1:** Charge to the Privacy Policies Implementation Team, approved by Executive Committee, 6/8/15

## Background

The University of Illinois Library supports its users' right to privacy, and confidentiality, in concert with current law and statements from the American Library Association, the Family Education Rights and Privacy Act, the Illinois Library Records Confidentiality Act and the University of Illinois' statements on privacy including the Web Privacy Notice and the Campus Administrative Manual. Many of the Library's policies relating to the maintenance of the right to privacy and confidentiality were articulated prior to the full development and application of many of the tools that we currently use, including the development of various social media outlets.

## Charge

Building upon the work of the Privacy Policies Working Group, this team is charged with developing procedures for reviewing and maintaining the Library's policies regarding personal privacy in the use of Library materials and related Library records, and providing an articulation of these policies to our users. In addition, the group will identify gaps in current policy and practice regarding privacy and engage in the development of new policies, guidelines and best practices. Finally, the Group will consider and make recommendations on the Library's role in educating our users about the privacy and security of their library records.

## Scope

The work of this group should include, but not be limited to, the following issues:

- Patron privacy regarding the use of materials
- Patron privacy regarding the use of electronic media
- Retention/disposal of records to support library services, research, security and related activities
- Investigation of other areas for development of training related to privacy awareness for staff and users
- Recommendations regarding implementation and dissemination of privacy policies and best practices

## Timeline & Process

The group is asked to provide a report to the Library's Executive Committee regarding the restatement, replacement, or reaffirmation of the Library's various privacy policies and suggest a way forward no later than July 31, 2015. To facilitate its work and engage others, the group should create a shared space for access to existing and draft documents.

## Membership

Melody Allison

Jim Dohle

Tom Habing (co-chair after September, 2015)

Lisa Hinchliffe

Karen Hogenboom (co-chair after September, 2015)

Lynne Rudasill

Sue Searing (chair until September, 2015)

*External experts were engaged as needed*



**Appendix 2:** Principles of Privacy, Confidentiality and Data Security

Grounded in the American Library Association’s Code of Ethics, the University Library strives to include these principles into its policies and practices:

1. Privacy, confidentiality and data security are service priorities for the Library.
2. We will create and regularly review policies and procedures for all Library activities that impact our patrons’ privacy or the confidentiality and security of their personally identifiable data.
3. We will collect only the data necessary to provide, improve, and sustain excellent service.
4. We will retain data only as long as needed to provide, improve, and sustain excellent service.
5. We will inform users of Library resources and services about the Library’s personally identifiable data collection practices, including:
  - a. what types of data we collect;
  - b. what types of data we preserve;
  - c. how we use such data;
  - d. who has access to it;
  - e. how long we keep it;
  - f. mechanisms for opting out or opting in to personal data collection, when such exist;
  - g. the steps we take to assure the confidentiality and integrity of the data;
  - h. the distinction between services and data under the Library’s control and services and data controlled by third parties, such as database vendors;
  - i. links to third party policies, when available.
6. Whenever possible, we will give users a choice about whether their data is collected and/or which data are collected and the default approach will be “opt out.”
7. Whenever possible, we will provide alternative channels for users to receive information or help (e.g. chat reference, telephone reference, face-to-face reference, etc.) and will explain the privacy ramifications of different choices.

8. Whenever possible, we will allow individuals to view the personally identifiable data we have collected about them and to verify its accuracy and, if necessary, correct or update it.
9. We will take reasonable steps to assure that the data we collect is accurate and to preserve its integrity and security.
10. We do not sell personal data. We will not share it with third parties except when necessary to maintain or improve Library services, and with stated safeguards for privacy and data security.
11. We will educate our staff to understand and apply these principles and to follow Library policies and procedures to implement them.
12. We will strive to educate library users about privacy, confidentiality, and data security, not only about Library content and services, but also about related larger issues in the information landscape.
13. We will monitor trends in privacy standards and practices and will modify Library practices as appropriate. In addition, we will consider proactive unilateral and collaborative initiatives to foster privacy in library (local and global) digital environments.

**Appendix 3:** Policy Template Form

Title:		
Owner(s) (Unit and Sub-Unit or Position):	Original Date of Approval:	Revision Date(s):
Approved by:	Review Cycle:	

**BACKGROUND/PURPOSE:**

Address the following:

- *Why does the policy exist?*
- *What are the driving and/or extenuating circumstances that require this particular policy in addition or exception to general Library policy?*
- *Is the context provided, such as legal requirement versus professional ethics?*

**POLICY STATEMENT:**

The following should be addressed as applicable:

- a. *Notice/Awareness*
  - *How are users and patrons informed of and directed to this policy?*
  - *How are Library Faculty and staff informed of and directed to this policy?*
  - *How are changes to the policy vetted and communicated?*
  - *Are the following points addressed and to what extent?*
    - *identification of the entity collecting the data; identification of the uses to which the data will be put;*
    - *identification of any potential recipients of the data;*
    - *the nature of the data collected and the means by which it is collected;*
    - *whether the provision of the requested data is voluntary or required;*
    - *steps taken by the data collector to ensure the confidentiality, integrity and quality of the data.*
- b. *Choice/Consent*
  - *Are options for opting in and/or opting out clearly explained?*
  - *If options for opting in and/or opting out do not exist, is this clearly indicated?*
  - *If choice/consent is limited (e.g., does not extend to third-party services) is this clearly explained?*
- c. *Access/Redress*
  - *Can an individual access data on himself or herself*
  - *Can an individual contest the data's accuracy and completeness?*
  - *If users have the ability to examine and/or revise their personal data, is the procedure clearly explained?*
  - *If users do not have the ability to examine and/or revise their personal data, is this clearly indicated?*
  - *What are the problems or limits to the user in accessing their personal data?*

d. *Integrity/Security*

- *Does the policy specify:*
  - *how data is protected*
  - *who has access to the data*
  - *how long the data is kept*
  - *whether it is anonymized*
- *If data collected is to be used for research purposes, is that stated?*

e. *Other Aspects of Content*

- *Is the content of the policy accurate?*
- *Is the policy up-to-date (note last reviewed date)?*
- *Is it clear whether it is a policy or a procedure?*
- *Is it specific enough? Is it too specific?*
- *Do links to documents or other information sources referenced within the policy still work?*

DISCLAIMERS/SCOPE (AS NEEDED)

To be addressed as needed:

- *Does the policy cover all relevant situations? If not, are exceptions clearly explained?*
- *Does the policy make clear when a third-party data provider is involved, and provide a link to the third-party entity’s relevant policies?*
- *Does the policy indicate how the involvement of third parties constrains the Library’s ability to control data content and use?*

SUMMARY OF CHANGES

*A brief summary of significant changes to existing documents. **Please include the last revision date and title of the document being replaced.***

DOCUMENT APPROVAL & TRACKING

Item	Contact	Date
Departmental or Committee Ownership		
Responsible Position	[Administrator, Unit Head or Chair]	
Departmental or Committee Approval		
AC or EC Approval		
University Librarian Approval		

**Appendix 3a:** Style Guidelines and Other Considerations for Privacy Policy Development

**Style Guides:**

1. Use the clearest and simplest language.
2. Include links to related policy and procedures, rather than repeating content from other sources, which may go out of date.
3. State each item in the future (e.g. “the staff member will report such incidents to...”) or imperative (e.g. “Report such incidents to...”) tense. Use the same tense throughout.
4. Avoid over-use of jargon.
5. Spell out acronyms the first time.
6. Refer to people by position or role, not name.

**Other factors to consider:**

1. Is it in the right location on the website?
2. Is it in the right category in the policy index?
3. Is it linked from other appropriate web pages?
4. Is it easily discoverable?
5. Is the “official” version available as a downloadable PDF?

**Appendix 4:** Privacy Policy Matrix

Only a subset of columns is shown in the below table. The complete table will include these columns:

- Policy
- Currently exists
- Link
- Privacy Addressed?
- Internal to Library
- Protected user/group?
- Owner
- Policy - last update
- Topic/Area
- Description
- Notes
- Last review
- Reviewed by
- Results of review
- Next review (date)
- Review frequency

It will be maintained and available on the Library'

Policy	Exists	Link	Privacy Addressed?	Internal to Library	Protected user/group?	Owner	Last Update	Topic/Area
Circulation Confidentiality	Yes	<a href="http://www.library.illinois.edu/circ/policies/Confidential.html">http://www.library.illinois.edu/circ/policies/Confidential.html</a>	Yes	Yes	UIUC Library patrons	Library Administrative Council	Oct-92	Patron Records

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Policy	Exists	Link	Privacy Addressed?	Internal to Library	Protected user/group?	Owner	Last Update	Topic/Area
Archives Website Privacy Notice	Yes	<a href="http://archives.library.illinois.edu/about-us/documents-and-policies/privacy-notice/">http://archives.library.illinois.edu/about-us/documents-and-policies/privacy-notice/</a>	Yes	Yes	All users	University Archives	2012	Patron Usage Data
Permission to Film in Library Facilities	Yes	<a href="http://www.library.illinois.edu/administration/services/policies/permission_film.html">http://www.library.illinois.edu/administration/services/policies/permission_film.html</a>	Not directly	Yes	UIUC community	Library Administrative Council	2006	photo/audio/video recordings in Library
Scholarly Commons Social Media Policy	Yes	<a href="http://www.library.illinois.edu/sc/about_us/socialmedia_policies.html">http://www.library.illinois.edu/sc/about_us/socialmedia_policies.html</a>	No	Yes	Scholarly Commons Faculty, staff and Graduate assistants	Scholarly Commons	2013	Twitter and Blog protocol for Scholarly Commons
Requests for Library Patron Information	Yes	<a href="http://www.library.illinois.edu/administration/services/policies/patronrequest.html">http://www.library.illinois.edu/administration/services/policies/patronrequest.html</a>	Yes	Yes	UIUC Library patrons	Library Administration (AC or EC?)	2013	Request for patron library records by law enforcement or other government officials
Ask a Librarian Privacy Policy	Yes	<a href="http://www.library.illinois.edu/askus/privacy.html">http://www.library.illinois.edu/askus/privacy.html</a>	Yes	Yes	UIUC Library patrons	Library Research and Information Services (RIS); Undergraduate Library (UGL)	2009	The use of chat reference through our VR service

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Policy	Exists	Link	Privacy Addressed?	Internal to Library	Protected user/group?	Owner	Last Update	Topic/Area
RBML Privacy Notice	Yes	Not on web - have internal policy.	Yes	Yes	UIUC RBML patrons	UIUC Rare Books and Manuscripts Library		
IDEALS Policy	Yes	<a href="https://wiki.cites.illinois.edu/wiki/display/IDEALS/Access+and+Use+Policy">https://wiki.cites.illinois.edu/wiki/display/IDEALS/Access+and+Use+Policy</a>	Yes	Yes	IDEALS service users	IDEALS service owners	2014	Dissemination of content; access to content; copyright; tacking use of content
Overview of University Library Search Process	Yes	<a href="http://www.library.illinois.edu/administration/human/pdffiles/search_procedures_manual.pdf">http://www.library.illinois.edu/administration/human/pdffiles/search_procedures_manual.pdf</a>	Only cursorily	Yes	Job Applicants	Library Human Resources	PDF file was last updated Sept. 2014	Search committees; recruiting; hiring process
Illinois Research Connections (PURE)	(in progress)			Yes				
Ezproxy	No			Yes				
Email with patrons	No			Yes	research, students, faculty on and off campus			



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Policy	Exists	Link	Privacy Addressed?	Internal to Library	Protected user/group?	Owner	Last Update	Topic/Area
Job applications - GA				Yes				
Job applications - Joyce	No	--	--	Yes	Graduate assistant job applicants	Library Human Resources	--	
RDS - Illinois Data Bank	No	--	--	Yes	Researchers, research subjects, system users	Research Data Service	--	Research Data
MINRVA and other Library cell phone apps	No			Yes				
Easy Search	No			Yes				
Journal Locator	No			Yes				
Family Educational Rights and Privacy Act (FERPA)	Yes	<a href="http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html">http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html</a>	Yes	No	Students	US Dept of Education		

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Policy	Exists	Link	Privacy Addressed?	Internal to Library	Protected user/group?	Owner	Last Update	Topic/Area
Appropriate Use of Computers and Network Systems at UIUC	Yes	<a href="http://cam.illinois.edu/viii/VIII-1.1.htm">http://cam.illinois.edu/viii/VIII-1.1.htm</a>	Yes	No	UIUC Community	Office of the Provost and Vice Chancellor for Academic Affairs	2003	UIUC campus computer and network Use
Illinois Library Records Confidentiality Act	Yes	<a href="http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=1004&amp;ChapterID=16">http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=1004&amp;ChapterID=16</a>	Yes	No	All Library Patrons	Illinois State Government	1985	Registration and Circulation records
VPAA Web Privacy	Yes	<a href="http://www.vpaa.uillinois.edu/policies/web_privacy.cfm">http://www.vpaa.uillinois.edu/policies/web_privacy.cfm</a>	Yes	No	All users	UI Vice President Academic Affairs	May-03	Terms governing use of UIUC web sites
Health Insurance Portability and Accountability Act (HIPAA)	Yes	<a href="http://www.hhs.gov/oc/privacy/index.html">http://www.hhs.gov/oc/privacy/index.html</a>	Yes	No	Medical records of all users	US Dept of Health and Human Services	1996 (law); 2002 (regulations)	Governs use of personal health information

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Policy	Exists	Link	Privacy Addressed?	Internal to Library	Protected user/group?	Owner	Last Update	Topic/Area
Interlibrary Loan Code for the United States	Yes	<a href="http://www.ala.org/rusa/resources/guidelines/interlibrary">http://www.ala.org/rusa/resources/guidelines/interlibrary</a>	Yes	No	All US interlibrary loan users	ALA	Prepared 1994, revised 2001, 2008	Governs use of information received in the process of requesting and receiving materials
i-card programs	Yes	<a href="https://www.icardnet.uillinois.edu/appPublicWebsite/policies.cfm">https://www.icardnet.uillinois.edu/appPublicWebsite/policies.cfm</a>	TBD	No	University of Illinois faculty, staff, and students	University of Illinois Administration		
Campus policy on Photography/Talent Release information	Yes	<a href="http://publicaffairs.uillinois.edu/resources/release/index.html">http://publicaffairs.uillinois.edu/resources/release/index.html</a>	Yes	No	anyone on UIUC campus	UIUC Public Affairs Office	2006	talent/model and location release (approval to use)
Security Camera Policy	Yes	<a href="http://www.cam.uillinois.edu/viii/VIII-1.5.htm">www.cam.uillinois.edu/viii/VIII-1.5.htm</a>	Yes	No	anyone on UIUC campus	Office of the Chancellor delegated to the Chief of Police	Sept. 2009	Security cameras
Library Camera Policy	Yes	-						
Electronic Theses & Dissertations	Yes	<a href="http://www.grad.uillinois.edu/thesis/faq">http://www.grad.uillinois.edu/thesis/faq</a>	Partial	No	Thesis submitters	Graduate College		

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Policy	Exists	Link	Privacy Addressed?	Internal to Library	Protected user/group?	Owner	Last Update	Topic/Area
University Library Privacy Policy	Yes	<a href="http://www.library.illinois.edu/administration/services/sub_policies/privacy.html">http://www.library.illinois.edu/administration/services/sub_policies/privacy.html</a>	Yes	Yes	University of Illinois faculty, staff, and students	AUL for User Services	2015	
External Services	Yes/No	<a href="http://www.library.illinois.edu/administration/services/sub_policies/privacy.html">http://www.library.illinois.edu/administration/services/sub_policies/privacy.html</a>						Use of external abstracting and indexing services provided by Library
Google Docs	Yes	<a href="http://www.google.com/intl/en/policies/privacy/">http://www.google.com/intl/en/policies/privacy/</a>	Yes	No	Google users	Google	June 30, 2015 but multiple frequent updates exist	Use of all Google tools and resources
Google Mail	Yes			No				
OTRS	No			Yes	Staff and Patrons submitting help request tickets	Library IT		Help request tickets
Copiers / Scanners	No			Yes	Users of Library public scanners or copiers	Library Facilities and Library IT		Scanners/Copiers

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Policy	Exists	Link	Privacy Addressed?	Internal to Library	Protected user/group?	Owner	Last Update	Topic/Area
Physical Consultation Spaces	No			Yes	Patrons engaged in face-to-face consultations with Librarians	AUL for User Services		Library Reference and Instruction

**Appendix 5:** Rubric for Privacy Policy Reviews

## PART ONE – The policy itself

This part of the rubric is organized to align with the template for privacy-related library policies.

### **I. Title.**

- Does it have a title?
- Is the title meaningful and distinct from other policy titles?

### **II. Background / Purpose.**

- Why does the policy exist?
- What are the driving and/or extenuating circumstances that require this particular policy in addition or exception to general Library policy?
- Is the context provided, such as legal requirement versus professional ethics?

### **III. Policy points to be addressed**

#### *a. Notice/Awareness*

- How are users and patrons informed of and directed to this policy?
- How are Library Faculty and staff informed of and directed to this policy?
- How are changes to the policy vetted and communicated?
- Are the following points addressed and to what extent?
  - identification of the entity collecting the data; identification of the uses to which the data will be put;
  - identification of any potential recipients of the data;
  - the nature of the data collected and the means by which it is collected;
  - whether the provision of the requested data is voluntary or required;
  - steps taken by the data collector to ensure the confidentiality, integrity and quality of the data.

#### *b. Choice/Consent*

- Are options for opting in and/or opting out clearly explained?
- If options for opting in and/or opting out do not exist, is this clearly indicated?
- If choice/consent is limited (e.g., does not extend to third-party services) is this clearly explained?

*c. Access/Redress*

- Can an individual access data on himself or herself
- Can an individual contest the data's accuracy and completeness?
- If users have the ability to examine and/or revise their personal data, is the procedure clearly explained?
- If users do not have the ability to examine and/or revise their personal data, is this clearly indicated?
- What are the problems or limits to the user in accessing their personal data?

*d. Integrity/Security*

- Does the policy specify:
  - i.* how data is protected
  - ii.* who has access to the data
  - iii.* how long the data is kept
  - iv.* whether it is anonymized
- If data collected is to be used for research purposes, is that stated?

**IV. Other aspects of content:**

- Is the content of the policy accurate?
- Is the policy up-to-date (note last reviewed date)?
- Is it clear whether it is a policy or a procedure?
- Is it specific enough? Is it *too* specific?
- Do links to documents or other information sources referenced within the policy still work?

**V. Disclaimers /scope**

- Does the policy cover all relevant situations? If not, are exceptions clearly explained?
- Does the policy make clear when a third-party data provider is involved, and provide a link to the third-party entity's relevant policies?
- Does the policy indicate how the involvement of third parties constrains the Library's ability to control data content and use?

**VI. Uniform policy requirements**

- Is the policy's "owner" (entity responsible for reviewing and updating) indicated by position or role, not by name?

- Is the entity that approved the policy, and subsequent revisions, identified? (Note: usually Administrative Council or Executive Committee for Library-wide policies.)
- Is the review cycle indicated (e.g., every year, every five years)?
- Are vague indications like “as needed” avoided?
- Are the dates of origin, approvals, revisions, and expiration all provided?

## PART TWO: Other factors:

- I. Is it in the right location on the website?
- II. Is it in the right category in the policy index?
- III. Is it linked from other appropriate web pages?
- IV. Is it easily discoverable?
- V. Is the “official” version available as a downloadable PDF?



**Appendix 6:** Mock-Up of Landing Page for User Access to Policies

The following is a mockup of the proposed new privacy policy web site, <https://wordpress.library.illinois.edu/privacy/>.

**UNIVERSITY LIBRARY**  
UNIVERSITY OF ILLINOIS AT URBANA-CHAMPAIGN

Search Library Webpages

# Library Privacy Policy

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## Documentation

- [Report](#)
- [Principles](#)
- [Template](#)
- [Rubric](#)
- [Policy Matrix](#)

## In this page:

- Documentation
- Additional Resources
- How to:
- Contact the Library Privacy Policy Implementation Team

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## Additional Resources

- [Library Policies](#)
- [Campus Policies](#)
- [State Policies](#)
- [Federal Policies](#)

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## How to:

- [Find Help](#)
- [Ask About a Policy](#)

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## Contact the Library Privacy Policy Implementation Team

If you have any questions or suggestion related to the Library Privacy Policy, please use the [Contact the Library Privacy Policy Implementation Team form](#).

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<b>Contact Us: ▾</b> University Library University of Illinois at Urbana-Champaign 1408 W. Gregory Dr.   Urbana, IL 61801 217.333.2290 Find us on Facebook Make a Gift	<b>Information for:</b> Undergraduates Graduate Students Faculty Alumni Visitors Affiliated Organizations Users with Disabilities Distance Learners Library Staff	<b>Feedback</b> Suggest an item for purchase Give us feedback/suggestions	<b>About this site</b> Privacy 
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## **Appendix 7:** Links to examples of unified policy repositories

The following are selected examples of policy templates, portals, platforms, and repositories for six academic institutions

Note: These are all examples from campus level policies. The University of Illinois does not seem to have a comparable web page – just a page that links to our campus policies. But this is the sort of thing that could be done at the Library level to help us organize, access, and archive policies in a uniform, consistent way.

### Rutgers University

<http://policies.rutgers.edu/resources/download-policy-template>

It contains major sections representing required information in every policy document. For example, “When building your policy in this template, please keep the text formatting ...”

Includes how to develop, revise, rescind plus policy portfolios by ownership.

“About” links to information about how they handle “Recent Policy Updates” and provides access to current and previous versions of recently updated policies in chronological date order.

### Yale University

<http://policy.yale.edu/policies-and-procedures-development-page-process-owners>

“The Policies and Procedures development page is designed for process owners who are responsible for the creation and modification of policy and procedure ...”

The web page contains templates, guides, and forms. It does not seem to contain links to previous versions, but it is a nice platform.

### University of New Mexico

<http://hsc.unm.edu/policyoffice/templates.html>

UNM’s web page provides templates including a guidelines template. Does not seem to contain links to previous versions, but it has page for policies under review which is nice.

### University of North Carolina at Chapel Hill

<http://policies.unc.edu/>

It is a portal for policies and procedures. You can also submit a policy recommendation! This page provides a template for university or administrative policy, <http://policies.unc.edu/files/2013/10/Policy-Template.docx>.

### Purdue University

<http://www.purdue.edu/policies/writing-guidelines.html>

<http://www.purdue.edu/policies/index.html>

The above templates may be used for campus policies and unit-level standards. There are no templates for operating procedures or system-wide guidelines.

There are templates, plus grammar style and rules, including ones for title and hyperlinks. They state: “The University Policies website is not a repository for policy-related documents. Instead, these items should be available on an appropriate unit-level website to which the policy or standard can link.” (Note: This is not necessarily what this committee is recommending. A single uniform policy repository would provide for a less chaotic solution.)

In general, the concept of a policy repository is potentially very useful! Plus, they have a whole office for policy – University Policy Office (UPO) with a portal that has new and recently revised and withdrawn policies, link to A-Z policy list, search by volumes and chapters (departments), search by audience (faculty, staff, students, visitors), plus a policy archive by issue and revision dates.

## Indiana University

<http://policies.iu.edu/development/template.shtml>

<http://policies.iu.edu/index.shtml>

The first link is to a policy template: “Download the template below to create a policy draft. Submit the draft to the Office of Policy Administration at [policies@iu.edu](mailto:policies@iu.edu).”

IU provides a search for policies, including an A-Z list, category, alphabetically, and most viewed policies. They list policies under review and new and recently revised. The “Policy Development Approval Process” workflow might be something the Library could adopt.