



MANAGEMENT REPORT

Date: February 20, 2019
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TO: Library Board
FROM: Dawn Ibey, Director, Library Experience
SUBJECT: **Privacy Audit Update**

SUMMARY

This report provides a progress update on the 2017 Privacy Compliance Audit conducted by the City of Vancouver's Internal Audit Division for the City of Vancouver including the Vancouver Public Library.

PURPOSE

This report is for information.

RECOMMENDATIONS

THAT the Committee recommend that the Board receive this report for information.

POLICY

VPL Protection of Privacy Policy: [\[Link\]](#)

VPL Code of Conduct: [\[Link\]](#)

STRATEGIC IMPLICATIONS

The *Protection of Privacy Policy* and the *Code of Conduct Policy* are the foundation of the Library's privacy management program. From the policies, operational guidelines and procedures are put

in place to enhance and ensure that VPL is compliant with the *Freedom of Information and Protection of Privacy Act* (FIPPA).

BACKGROUND

Privacy Policy and Code of Conduct Policy

Vancouver Public Library is committed to protecting personal privacy. Any personal information collected, used, or disclosed by Vancouver Public Library is in accordance with the *B.C. Freedom of Information and Protection of Privacy Act* (FIPPA). The Library's *Protection of Privacy Policy* was revised and approved by the Board in May 2016. The Director, Library Experience serves as the Library's Privacy Officer.

The Library's *Code of Conduct Policy* sets expectations for staff for handling confidential information and protecting privacy. When dealing with personal information, staff must comply fully with the provisions of the *Freedom of Information and Protection of Privacy Act*. The Library's *Code of Conduct Policy* was revised and approved by the Board in January 2016.

The *Protection of Privacy Policy* and the *Code of Conduct Policy* are published on the VPL website.

Privacy Compliance Audit

In the fall of 2016, the City of Vancouver scheduled an internal audit of Privacy Compliance. The objective of the audit was to evaluate the effectiveness of City wide internal controls in place supporting compliance to privacy regulations.

The scope of the audit included the following areas:

- Governance, policies and procedures;
- Collection, use, disclosure, retention;
- Protection of information; and
- Compliance monitoring and incident response.

A final report with recommendations was issued in March, 2017. The Privacy Compliance Audit recommended three actions to strengthen VPL's privacy management program:

- 1) Enhance Privacy Training
- 2) Formalize Breach Management Protocols
- 3) Establish a Personal Information Bank (PIB)

A target date of December 31, 2017 was set for VPL to complete the actions. Prior to beginning the work, project staff participated in intensive training on privacy legislation and municipal government. Work on the recommendations began in July 2017 following the training.

DISCUSSION

All new VPL staff are oriented to and provided with copies of the *Protection of Privacy Policy* and the *Code of Conduct Policy* during the mandatory orientation session. Staff sign the policies to confirm that they understand VPL's requirements and expectations. Unit Heads and Supervisors are responsible for ensuring compliance at the unit level.

Training

To meet the recommendation for enhanced Privacy Training, staff developed a *Protection of Privacy at VPL Crew Talk*, which was presented at the January 2018 Leadership Team meeting and to staff at the unit level in the following weeks. Unit Heads and Supervisors are responsible for training on privacy issues on an ongoing basis. In October 2017 and March 2018 a Board workshop was given on *Privacy, Email and Mobile Devices*. Training on the Board's obligations under the *Freedom of Information and Protection of Privacy Act* has been incorporated into the Board Training Plan. In January 2019 the Board approved the *CCTV Systems Policy*. Training on the new policy has been scheduled for locations with CCTV systems.

Privacy Breach Protocols

The audit identified three components to guide staff and help provide additional risk mitigation in dealing with privacy breaches:

- 1) Document a privacy breach management response plan including appropriate escalation protocols from branch level to VPL senior management
- 2) Implement a privacy breach checklist to guide staff on appropriate steps in responding to a privacy breach
- 3) Ensure that privacy breach incidents are documented and tracked in an incident log noting the severity and outcome of a privacy breach

The City of Vancouver's Access to Information Office is scheduled to complete their Privacy Breach Response Plan in Q2 2019. Following, VPL will create a plan that aligns with the City's protocols. Once completed, a privacy breach checklist, based on the response plan, will be developed for staff. Staff anticipate this work being completed in Q3 2019. VPL currently uses the OIPC checklist for breach response and management. An incident log for privacy breaches was established in Q1 2018.

Personal Information Bank (PIB)

A Personal Information Bank is a directory of the different types of personal information collected by VPL and the purpose under which it was collected. Work on this recommendation began in Q3

2017 following staff training. Staff completed the directory in Q3 2018 and published on the VPL website per FIPPA. The Personal Information Bank will be reviewed annually for updates.

FINANCIAL IMPLICATIONS

There are no financial implications for this work in 2019.

FINAL REMARKS

The Privacy Management Audit provided an opportunity to have our privacy management framework assessed for gaps and potential risks. On completion of its recommendations, an enhanced staff training program, the development of a Personal Information Bank, and the development of privacy breach response protocols, VPL will build awareness of its processes and strengthen its privacy management program.