



PRIVACY

AUDITS



- 4 What is a Privacy Audit? .....
- 5 Why are Privacy Audits Important? .....
- 6 Building the Audit Framework .....
- 10 Using Guidelines and Checklists .....
- 14 Performing the Audit .....
- 15 Telling the Audit Story .....
- 16 Rinse and Repeat! .....

# What is a Privacy Audit?

Privacy audits are procedures to ensure that your organization's goals and promises of privacy and confidentiality are supported by its practices, thereby protecting confidential information from abuse and the organization from liability and public relations problems.

**A privacy audit provides a library an opportunity to examine:**

- How privacy matters are handled at all levels
- The flow and storage of data
- The role data plays within the organization
- Staff training about privacy matters
- Existing and needed privacy policies
- User privacy and confidentiality

**This is an ongoing process, not a one-shot project. Audits will look different depending on the size of the library and the level of control staff have over their technology infrastructure.**

# Why are Privacy Audits Important?

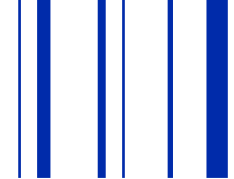
Privacy is essential to the exercise of free speech, free thought, and free association. It is the responsibility of all libraries to ensure that their procedures and policies are designed with privacy in mind. If users lose their privacy, then they lose what makes a library so great: that freedom to seek information without fear of reprisal. It is the responsibility of all libraries to ensure that their procedures and policies are designed with privacy in mind.

In today's society, there is almost no place a person can go to seek out information without being tracked. Libraries have an ethical and democratic duty to be that place. When people are being watched, they change their behavior. A library that monitors and shares a user's information is no longer protecting intellectual freedom. Libraries should make every effort to provide a private place for people to exercise their information access rights by performing regular privacy audits.

Every library needs to perform audits to understand how they, their vendors, partners, and administrators are handling user data. Even if your library is one room with one person on staff you can ask the core set of audit questions. Understanding what current practices are is the first step in crafting privacy-minded procedures and policies. With an increased reliance on third-party vendors, libraries are not able to have full control over users' data. However, a privacy audit will assist libraries in being transparent with users about how their data is handled by the library and its vendors.

# Building the Audit Framework

A privacy audit will cover a wide breadth of information, allowing you to dig deep into all areas of your library that interact with user data. The first step is to brainstorm all the places you will need to audit.



## EXERCISE

What are the different places in your library that collect user data?

- Examples
  - Integrated Library System
  - Volunteer Paperwork
  - Social Media
  - Learning Analytics Software
  - Website
  - Student Dashboards

■ Where is User Data Collected in Your Library?

A white rectangular area containing ten horizontal blue lines for writing, intended for the user to list locations where user data is collected in their library.



## Core Questions

Once you've identified all the areas in the library that interact with user data, you'll want to ask yourself a set of Core Questions. Keep these questions handy and ask them anytime you, a partner, or a vendor is planning to collect user data. They will help you to collect the least amount of data needed, ensure it's stored securely, and deleted according to a regular schedule.

### EXERCISE

Pick one of the places in your library that collects user data. Answer these Core Questions.

- What information do you collect?

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- Why do you collect it? Do you need to collect it?

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- How do you collect it?

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- Who has access?

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- What are the storage and retention policies/procedures?

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- What are the current best practices and policies?

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Is the user data shared with or collected by third-party vendors?

- What vendors are used?

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- What information is shared or collected by the vendor?

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- Is the information collected by the vendor necessary for business operations?

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- What are the vendor's privacy policies and do they align with the library's?

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- What changes need to be made to ensure the privacy and security of user data?

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# Using Guidelines and Checklists

The Core Questions are a great starting place for any audit. The next step is to dig in deeper and align your library with the privacy guidelines established by the American Library Association (ALA). ALA has created a set of guidelines and checklists that are available to assist librarians, libraries, schools, and vendors to develop best practices for online privacy, data management, and security.

The guidelines and checklists were created for every library, of any size, to be able to use. The checklists are broken down into three priority levels.

- **Priority 1** items should be achievable by every library. These are the must do items.
- **Priority 2** items will be able to be met by larger systems and those with more control over their IT systems.
- **Priority 3** are for those libraries with a deeper technological understanding and resources. Some of these will be optional.

You can use these checklists as part of the audit process. They will enable your library to be in alignment with the ALA guidelines and give you insight about current practices and policies.

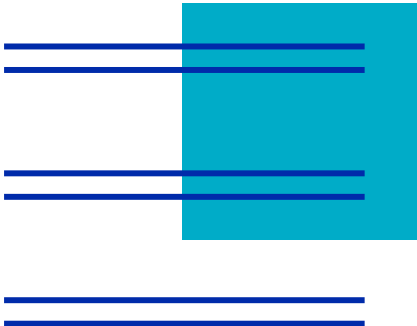
## EXERCISE

### ■ Read through all of the checklists

- Privacy Checklist Overview ..... <https://bit.ly/checklistoverview>
- Vendors ..... <https://bit.ly/checklistvendor>
- Data Exchange Between Networked  
Devices & Services ..... <https://bit.ly/checklistnetwork>
- Public Access Computers & Networks ..... <https://bit.ly/checklistcomputer>
- Library Websites, OPACs, &  
Discovery Services ..... <https://bit.ly/checklistdiscover>
- Library Management Systems ..... <https://bit.ly/checklistlms>
- Students in K-12 Schools ..... <https://bit.ly/checkliststudent>
- Assistive Technology ..... <https://bit.ly/checklistassist>

### ■ Select the priority level your library would like to meet.

- Priority 1       Priority 2       Priority 3



## EXERCISE

Complete the Privacy Checklist Overview. As you complete the checklist, ask yourself, “Is our library already doing this?” or, “Is our library doing this, but it needs work?” or if you’re not doing it all, “What does our library need to do in order to complete this checklist item and who’s going to do it?”.

PRIVACY CHECKLIST OVERVIEW	STATUS	STAFF ASSIGNED	DUE DATE	NOTES
Create a privacy policy that addresses the collection of user information. For guidance see the Privacy Policies Field Guide.	<input type="checkbox"/> NOT STARTED <input type="checkbox"/> IN PROGRESS <input type="checkbox"/> NEEDS WORK <input type="checkbox"/> COMPLETED			
Destroy all paper records with user data that no longer have a business need, such as computer sign-in sheets. Keep any future records in a secure location.	<input type="checkbox"/> NOT STARTED <input type="checkbox"/> IN PROGRESS <input type="checkbox"/> NEEDS WORK <input type="checkbox"/> COMPLETED			
Ensure all existing security certificates for HTTPS/SSL are valid and create a procedure for revalidating them annually.	<input type="checkbox"/> NOT STARTED <input type="checkbox"/> IN PROGRESS <input type="checkbox"/> NEEDS WORK <input type="checkbox"/> COMPLETED			
Decide who in the library will handle requests for personally identifiable information of users from law enforcement officials and other third parties.	<input type="checkbox"/> NOT STARTED <input type="checkbox"/> IN PROGRESS <input type="checkbox"/> NEEDS WORK <input type="checkbox"/> COMPLETED			
Ensure there is a formal process in place to address breaches of user data directly under library control or maintained by third parties. The library should notify affected users when they become aware of a breach.	<input type="checkbox"/> NOT STARTED <input type="checkbox"/> IN PROGRESS <input type="checkbox"/> NEEDS WORK <input type="checkbox"/> COMPLETED			
Purge search history records regularly, ideally when the individual computer session ends.	<input type="checkbox"/> NOT STARTED <input type="checkbox"/> IN PROGRESS <input type="checkbox"/> NEEDS WORK <input type="checkbox"/> COMPLETED			
Purge circulation and interlibrary loan records when they are no longer needed for library operations. Any user data that is kept for analysis should be anonymized or de-identified and have access restricted to authorized staff.	<input type="checkbox"/> NOT STARTED <input type="checkbox"/> IN PROGRESS <input type="checkbox"/> NEEDS WORK <input type="checkbox"/> COMPLETED			
Complete the additional privacy checklists found on the ALA website.	<input type="checkbox"/> NOT STARTED <input type="checkbox"/> IN PROGRESS <input type="checkbox"/> NEEDS WORK <input type="checkbox"/> COMPLETED			

# Performing the Audit

If you are at a larger library you will want to establish a team to complete the audit. Smaller libraries may find themselves with a team of one. That's okay! Even if you don't have the ability to make large sweeping changes, plan to audit whatever you can. Ask those Core Questions and identify the areas where you can make changes

## EXERCISE

- **Create spreadsheets for each of the ALA Privacy Checklists.** Only add the items from the priority level that your library is following. Also, create documents where you can answer the Core Questions for each of the areas of your library that handle user data.
- **Assign tasks.** Establish who will be responsible for seeing if the library is currently in compliance with a checklist item. Will that same person be responsible for bringing you into compliance? Identify who will research and document the answers to the Core Questions.
- **Build a timeline.** Create due dates for completing checklist items and answering Core Questions. If changes need to be made, when do they need to be completed?
- **Document your findings.** Everything you audit should have a document that outlines your findings. If you discovered changes that need to be made, determine who has the authority to change them. Bring your documentation to the appropriate staff to make a case for new policies and procedures.

You may have to interact with units outside of the library such as campus or school IT. Set up a meeting to discuss the audit. Do they already perform one regularly? Can the ALA checklist items be added to their audit process?

# Telling the Audit Story

An audit doesn't just happen in someone's head as they think about all those questions and checklist items. You must have a method for capturing findings and noting what changes are going to be made and when. Each area of the library being audited should have a document detailing the findings. The documents will be a reflection on the checklist items, answers to the Core Questions, and any recommendations or future actions that need to be done or are in the process of getting started.

## EXERCISE

How will your library tell its audit story? Detail methods of transparency and any stakeholders that the audit should be shared with.


Consider sharing your findings documents with stakeholders inside and outside the library. This provides transparency and highlights the importance of privacy in the library.



# Rinse and Repeat!

Your first privacy audit will be the most challenging and require the most work. Establish how often the library will perform audits and stick to a schedule. Remember that after each audit you should go back to your policies and procedures to ensure they are up-to-date.

## EXERCISE

Determine a schedule for a regular audit. What position at the library will take the lead? What resources will your library need to support this ongoing work?

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## NOTES

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## PRIVACY ADVOCACY GUIDES

Privacy is a core value of librarianship, yet it often feels like an overwhelming and onerous undertaking. Use these Privacy Field Guides to start addressing privacy issues at your library. Each guide provides hands-on exercises for libraries. Check out all the available guides at [bit.ly/PrivacyFieldGuides](http://bit.ly/PrivacyFieldGuides).

