

Privacy Audits for Public Libraries

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Privacy Audits for Public Libraries



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Who Are We?

What are we going to cover?

- Introduce privacy audits
- Provide examples of audits
- How to plan for an audit and evaluate the results
- Additional resources for privacy audits

What is a privacy audit?

- Varies depending on the needs of the organization
 - Basic idea is physical and electronic access to patron and staff information
- Evaluate and examine the flow of data
 - Where is data originated?
 - Where is it stored?
 - How is it accessed and by whom?



What is a privacy audit?

- Who has access to patron and staff information?

- Examine third-party organizations
- Outside contractors, contracts

- Policy review

- Review and examine all policies regarding privacy for staff and patrons

- Training

- What training do staff receive regarding privacy?
- How often?



Comparing Across Organizations

Different Types of Libraries

Public Libraries: Often integrated into other facets of the municipal government. Administration, budgetary, and privacy risks.

Academic Libraries: Report to the university and have intertwined financial and technology. FERPA.

Special Libraries: Part of a corporation or non-profit agency, will have integrated technology and risks.

Examples of Privacy Audits

- San Francisco Public Library
 - <https://sfpl.org/about-us/sfpl-data-privacy-audit>
 - Identify core focus
 - Introduction and Background
 - What data they used
 - Recommendations



Examples of Privacy Audits

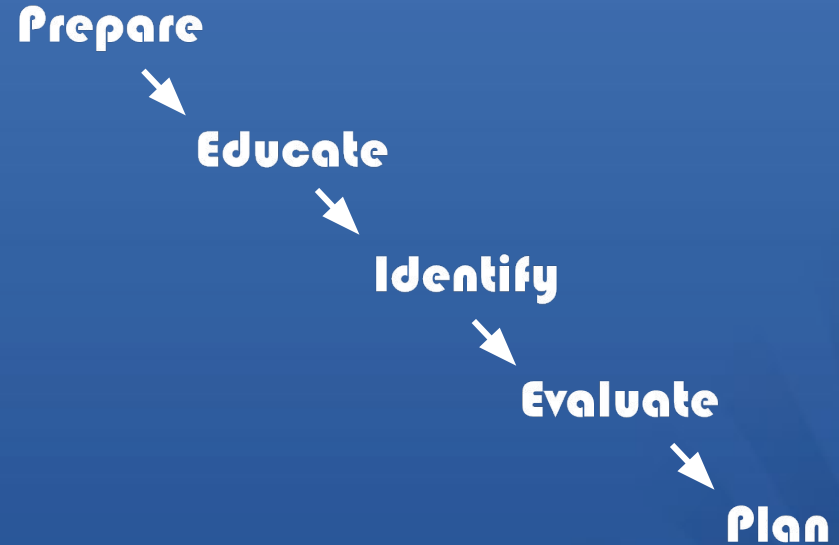
- San Jose Public Library
 - <https://www.sjpl.org/privacy/privacy-audit>
 - Separation of various areas
 - Each section has an overview, the information collected, partners, ALA recommendations
 - Action plan

Examples of Privacy Audits

- Duke University Libraries
 - <https://tinyurl.com/2zrbsc8n>
 - Begins with an executive summary of the key findings and recommendations - this summary may be seen by individuals outside of the library.
 - Account of all technologies and associated privacy risks.
 - Next steps for acting upon these findings.
 - Copies of the assessment instruments (interview protocol, list of everything evaluated).

Flow of an audit

- Prepare for Audit
- Educate Staff/Stakeholders
- Identify Focus Areas
- Evaluate and Prioritize
- Plan for Improvement



Flow of an audit

- Prepare
 - Survey organization
 - Discuss with stakeholders potential needs
 - Review recent literature
 - Review other audits



Flow of an audit

- Educate
 - Prepare staff for what is happening and any disruptions if necessary
 - Talk with vendors and third-party entities about what is required and how to provide it
 - Inform identified stakeholders of audit, areas of focus, timelines

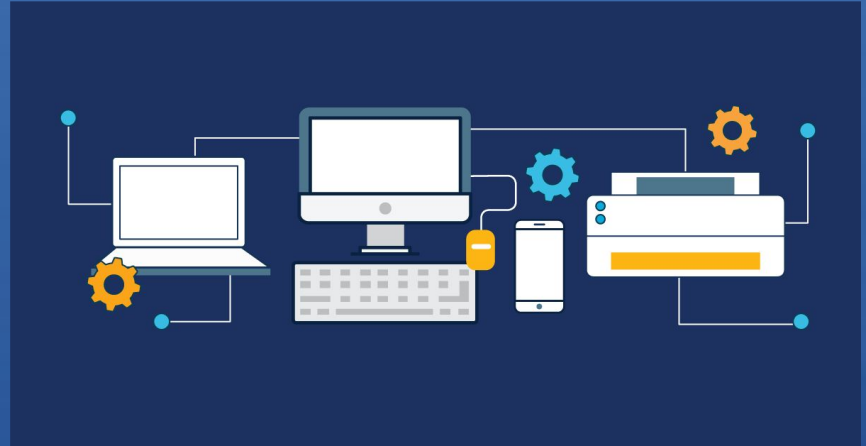
Flow of an audit

- Identify

- Locate the resources needed for each focus area
- For each focus area, identify the data, where it comes from, where it is stored, and how it is used
- Work with focus area staff to determine how to evaluate each identified system
- Identify and contact third-party entities involved

Flow of an audit

- Identify
 - Identify the areas of focus
 - Information Technology
 - Internal communication
 - Marketing, social media
 - Physical security
 - Internet resources
 - Technical services
 - Public Services
 - HR
 - ILS



Flow of an audit

- Evaluate and prioritize
 - Document everything during process
 - Work with each identified area to prepare documentation and evaluation of audit
 - Prepare final documents
 - Review all findings and identify areas to work on
 - Plan the next steps for each identified solution and prioritize them

Flow of an audit

- Plan
 - Look back at what worked and what did not
 - Survey stakeholders and focus area members
 - Layout a timeline to evaluate long term effectiveness
 - Plan next audit



The next audit

- When planning next audit
 - Different audit types
 - In-depth audit of one area
 - Move to secondary levels of areas
 - Outside audits
 - Third-party entities that perform audit
 - Scheduled audits



Resources

- ALA Field Guides -
https://www.ala.org/advocacy/sites/ala.org.advocacy/files/content/privacyconfidentiality/PrivacyAudits-Privacy-Advocacy-Guides_v2.pdf
- ALA privacy guidelines -
<https://www.ala.org/advocacy/privacy/guidelines>

Resources

- Vendor contact and policy rubric - <https://publish.illinois.edu/licensingprivacy/files/2021/11/Licensing-Privacy-Vendor-Contract-and-Policy-Rubric.pdf>
- Choose Privacy Everyday - <https://chooseprivacyeveryday.org/privacy-basics-and-beyond/audits/>

Resources

- Library Freedom Project -
https://libraryfreedom.org/wp-content/uploads/2021/02/LFP-Vendor_Privacy_Audit_022121.pdf
- Lessons from a privacy audit -
<https://kmlussier.com/lessons-from-a-library-privacy-audit/>

Thanks!

Thank you so much for participating in our Privacy Audit webinar. Feel free to contact us if you have questions.

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