PRIVACY POLICY

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1 PURPOSE

Connected Libraries Ltd (Connected Libraries) is committed to managing personal, sensitive and health information lawfully, transparently and securely. This Policy explains how information is collected, used, disclosed, stored, accessed, corrected, retained and protected across library services, programs, digital services and corporate operations.

VALUES

CL's organisational values underpin the expectations and behaviours outlined in this policy.

2 SCOPE

This Policy applies to Connected Libraries' handling of personal, sensitive, health and other identifying information collected or held in connection with library operations, programs, employment, volunteering, governance, feedback, website use and other services.

It applies to all employees, volunteers, contractors, officers, Board directors, service providers and third parties who handle information on behalf of Connected Libraries.

3 DEFINITIONS

Personal information	Personal information means recorded information or an opinion, whether true or not, about an identified individual or an individual who is reasonably identifiable. Examples of personal information include a person's name, sex, date of birth, address, financial details, marital status, and education and employment history.
Sensitive information	Sensitive information means personal information about matters such as racial or ethnic origin, political opinions, religious beliefs or affiliations, philosophical beliefs, trade union membership, sexual orientation or practices, or criminal record.
Health information	Health information means information or an opinion about an individual's physical, mental or psychological health, disability, or a health service provided or to be provided to the individual.
Library record	Library record includes membership and borrower records, circulation records, reservations, fines or accounts, correspondence, technology use records where applicable, and other records created as part of service delivery.

4 POLICY STATEMENT

The following principles apply to all aspects of CL privacy, membership and employee details collection.

4.1 WHAT INFORMATION CONNECTED LIBRARIES MAY COLLECT

Connected Libraries collects and uses information to administer membership, lending, reservations, events, outreach and digital services; maintain safety and security; communicate with members and the community; plan and improve services; manage workers and volunteers; respond to enquiries, feedback, incidents and complaints; and meet legal, governance, financial, records and safety obligations

Connected Libraries collects only information that is reasonably necessary for its functions and activities, or otherwise required or authorised by law. Depending on the service or activity, this may include:

- name;
- residential and/or postal address;
- telephone number(s);
- email address(es);
- date of birth;
- proof of identity or membership eligibility details;
- parent/guardian or guarantor details for children or other users where required;
- records of current loans, reservations, lost/damaged items, account notes, charges or recovery action;
- program, event, room booking or home library service information;
- website, Wi-Fi, device, CCTV, clickstream or digital service information where relevant to service delivery, security or systems administration;
- employee, volunteer, applicant and contractor information required for recruitment, engagement, payroll, safety and people management; and
- health information only where necessary and permitted, for example to support a service adjustment, accessibility requirement, workplace process, or safety obligation.

Connected Libraries may also collect de-identified or aggregated data for planning, reporting, service evaluation, demand management and improvement of library services, provided individuals are not identified unless lawful and necessary.

4.2 HOW INFORMATION IS COLLECTED

Where reasonable and practicable, Connected Libraries collects personal information directly from the individual. Information may be collected in person, by phone, in writing, online, through forms, digital platforms, email, service interactions, security systems, website or analytics tools, or from trusted third parties where lawful and appropriate.

If information is collected from another person or source, Connected Libraries will take reasonable steps to notify the individual unless an exception applies.

Collection notices will generally explain who is collecting the information, why it is collected, usual disclosures, any legal requirement, the consequences of not providing it, and how access or correction can be requested.

4.3 USE AND DISCLOSURE

Connected Libraries will only use or disclose personal information for:

- the primary purpose for which it was collected;
- a directly related secondary purpose that the individual would reasonably expect;
- another purpose with the individual's consent; or
- a purpose otherwise permitted or required by law.

Health information will only be used or disclosed in accordance with the Health Records Act 2001 (Vic). Connected Libraries does not sell, rent or trade personal information.

Information may be disclosed to service providers, contractors or agents where necessary for library operations, including library management systems, digital platforms, website and communication tools, payment processing, printing and booking systems, debt recovery, security, legal, audit and professional services.

Where information is disclosed to third parties or under lawful authority, Connected Libraries will take reasonable steps to ensure privacy, confidentiality and security obligations are met and records are retained as required.

4.4 TRANSBORDER DATA FLOWS AND THIRD-PARTY PLATFORMS

Connected Libraries uses SirsiDynix and other third-party platforms to support library operations, including bookings, surveys, newsletters, eResources, communications, security, analytics and website services.

Some information may be handled through cloud-based or externally hosted systems, including systems located outside Victoria or Australia. Connected Libraries will only disclose information in these circumstances where permitted by law and where appropriate privacy, confidentiality and security protections apply.

Connected Libraries remains responsible for how information is handled and will take reasonable steps to ensure third-party providers apply appropriate contractual, technical and organisational safeguards.

4.5 DATA QUALITY

Connected Libraries will take reasonable steps to ensure that the information it holds is accurate, complete, up to date and relevant for the purpose for which it is used. Connected Libraries relies on individuals to provide accurate information and to notify it when their details change.

4.6 DATA SECURITY

Connected Libraries will take reasonable steps to protect information from misuse, loss, unauthorised access, modification or disclosure through measures such as role-based access, confidentiality obligations, training, authentication controls, logging, secure disposal, backups, vendor controls and physical security.

4.7 DATA BREACHES

Connected Libraries will maintain procedures to identify, contain, assess and respond to privacy breaches and data security incidents, including mitigating harm, investigating the incident, documenting decisions and improving controls where required.

Where required, Connected Libraries will notify affected individuals and relevant regulators, including under the Notifiable Data Breaches scheme if applicable.

4.8 ACCESS AND CORRECTION

Individuals may request access to, or correction of, their personal information held by Connected Libraries. Connected Libraries will respond in accordance with applicable law and its procedures.

Connected Libraries may provide access informally where appropriate. More formal requests, including requests concerning documents, may need to be managed under the Freedom of Information Act 1982 (Vic) or other applicable law.

Requests for access or correction should be made to:

Chief Executive Officer
Connected Libraries Ltd
Locked Bag 2400
Cranbourne East, VIC 3977
information@connectedlibraries.org.au

Once PRINTED, this becomes an UNCONTROLLED DOCUMENT. Refer to Governance Portal for latest version.

Proof of identity or authority may be required. Access may be refused or limited where permitted by law.

4.9 UNIQUE IDENTIFIERS AND ANONYMITY

Connected Libraries may allocate a unique identifier to a person where reasonably necessary for efficient service delivery and administration, for example a library membership number or employee identifier. Connected Libraries will not generally adopt, disclose or require other organisations' unique identifiers except where permitted by law.

Where lawful and practicable, Connected Libraries will provide individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with Connected Libraries. This may be possible, for example, for general enquiries. In many library, employment, security or transaction-based situations, however, it will not be practicable to deal with an individual anonymously or pseudonymously.

4.10 SENSITIVE INFORMATION AND HEALTH INFORMATION

Connected Libraries will only collect sensitive information or health information where the individual consents, the collection is required or authorised by law, or another lawful basis applies. Such information will be handled with particular care and used or disclosed only in accordance with applicable law.

4.11 WEBSITE, DIGITAL SERVICES, CCTV AND TECHNOLOGY RESOURCES

Connected Libraries may collect limited technical, website and usage information through websites, online services, Wi-Fi, booking systems, eResources, cookies, analytics tools and other platforms for security, functionality, administration, planning and service improvement.

CCTV or other monitoring systems may be used for safety, security or incident management in accordance with applicable law and related internal policies.

4.12 RETENTION AND DISPOSAL

Connected Libraries will retain information only for as long as required for operational, legal, governance, evidentiary and records management purposes, and will securely destroy or de-identify information when it is no longer required and disposal is authorised.

Retention and disposal decisions must be consistent with applicable legislation, organisational requirements, and any relevant Retention and Disposal Authority or other lawful records management framework. Connected Libraries must not rely solely on arbitrary deletion periods where legal retention obligations apply.

4.13 COMPLAINTS

Any person who believes Connected Libraries has mishandled their personal information or health information may make a complaint to Connected Libraries in writing. Connected Libraries will handle complaints confidentially, fairly and in a timely manner.

Complaints should be addressed to:

Chief Executive Officer
Connected Libraries Ltd
Locked Bag 2400
Cranbourne East, VIC 3977
information@connectedlibraries.org.au

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If a person is dissatisfied with Connected Libraries' response, they may contact the relevant external body, including OVIC for Victorian public sector privacy matters, the Health Complaints Commissioner for health information matters, or the OAIC where the Privacy Act 1988 (Cth) applies.

5 RESPONSIBILITIES

Reporting
If information is required to be provided by legislation or court order, a record of that disclosure must be kept, by the Chief Executive Officer

No additional reporting is required.

Review
This policy is to be reviewed annually, or as required due to any changes in the handling and storage of personal information by the Library Service.

6 RELATED LEGISLATION AND DOCUMENTS

Our Documentation
Employee Code of Conduct
Freedom of Information Policy

Other Related Documentation
Australian Privacy Principles
Health Records Act 2001 (Vic)
Privacy Act 1988 (Cth)
Privacy and Data Protection Act 2014 (Vic);

7 APPROVAL AND REVIEW DETAILS

Approval and Review	Details
Approval Authority	General Manager, Finance & Digital Operations
Advisory Committee to Approval Authority	Executive Team
Administrator	Executive Assistant
Next Review Date	October 2027

Approval and Amendment History	Details
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Amendment Authority and Date	October 2026
Notes	This is a new document that replaces and combines 1.07 Privacy Policy and 6.12 Privacy of Records and Membership Details.