

1 May 2002

To: John Tanno, SOPAG Chair
From: Tammy Dearie, RSC Chair
Re: RSC Comments on the Report of the Task Force to Develop Model
Policy on Privacy for Library-Provided Digital Services

Thank you for the opportunity to comment on the Report of the SOPAG Privacy Task Force. The Resource Sharing Committee and its subcommittees, the Circulation Advisory Group (RSC-CAG) and the Interlibrary Loan Advisory Group (RSC-IAG), have reviewed the report and accompanying web site. The scope of the report and the breadth of issues addressed within the report greatly impressed the committees. The committees discussed the report in detail either during a committee meeting or via electronic mail discussions.

Circulation and interlibrary loan staffs have been aware of the importance of adhering to privacy requirements regarding user and circulation records since the original California State Privacy Act. However, the report provided a much deeper review of the issues, the records we keep, and the importance of applying privacy policies in a new era of electronic and digital services and resources. While the committees endorsed all the recommendations, we found the following of particular importance to the work of the committees and their work on their home campuses.

- Recommendation 1, to further develop the draft UC libraries' privacy web site, the committees found this recommendation to be of particular significance. The web site is already of great value and many campuses have begun to review their operations and existing policies and procedures for compliance. RSC suggested adding resources to assist campuses in evaluating ILS systems and their privacy components since many campuses are currently involved in negotiating for new systems or up-grades. Another area for future development is to address the sharing of otherwise confidential information between UC Libraries. For instance, many UC circulation units deal with delinquent borrowers who use multiple libraries across the system. While we maintain a desire to protect the privacy of the borrower, their behavior also impacts all our libraries. We strongly encourage that development of the web site be expanded to cover these types of issues and maintained. It is, and will continue to be, an extremely useful resource for libraries.
- Recommendation 3, the creation of a task force to review and revise the University Records Management Disposition Schedule for Library Records, was also of importance to the committees. Many libraries reported confusion in what records they need to keep, for how long, and in what format. Clarification and updating of the policy would assist staff in their procedures and operations. Recommendation 4 will also assist in this effort.

- Finally, recommendation 5 was also seen as being of great value to the committees. Without leadership the committees felt that privacy policies and compliance would be overlooked as staff change positions and institutional history is lost. A staff member on each campus, and by extension, a group of nine colleagues with which to consult, would mean greater conformity, awareness, and compliance.

The committees also had some questions for the Task Force to consider. Specifically, the document does not mention training or oversight of staff in privacy policy and questioned whether there is any thought being given to this area. Also, the report does not mention privacy issues related to relationships the libraries have with outside entities. For example, what are the implications for the document delivery services the University libraries provide (for a fee) to outside entities? Perhaps coverage of this area can be expanded in the web site.

The Resource Sharing Committee and subcommittees strongly endorse the recommendations listed in the report. We encourage SOPAG to adopt the recommendations and move forward with implementation.