

NON-PUBLIC INFORMATION SECURITY POLICY/PROCEDURES

Purpose

The Northeast Georgia Regional Library System Services Office, along with its affiliated partners, is entrusted with numerous items of personal information and data that are non-public in nature and which must be protected from exposure and loss. Legitimate use of this information is essential to personnel administration and the delivery of library services. Security and protection of this information is an important part of the System's service and credibility. This policy establishes practices, precautions, and internal awareness that will adequately protect non-public information from exposure and loss. Policy in this area is an ongoing and continuous initiative which considers protective measures in the context of legal requirements, user needs, patron service, personnel administration, and potential exposure to loss.

Identification

The Northeast Georgia Regional Library System identifies two types of non-public information within the organization. These are patron personal information and certain types of employee personal information.

Employee Non-Public Information

The Library System and its affiliates comply with Georgia Code 50-18-72, which deems certain personnel related information non-public.

Employee non-public information includes but may not be limited to:

- Social Security number
- Family background and names
- Date of birth
- Home Address
- Health information
- Phone Number(s)
- E-Mail Address

Some of these elements may be public in some respects and may be available from State of Georgia and other sources, but since in some instances they are not, such information will not be made available by the library.

The following procedures and standards for physical security are required to ensure physical protection of non-public information:

- Provision of locking and/or fireproof files for the information;
- Secure locks and doors on offices and areas where non-public information is stored;
- Locking of building areas and offices containing non-public information when these areas are not in use or under supervision of library staff;

- Limitation of keys and access to regional and affiliated library facilities to that which is essential for operation;
- Monitoring of facility use by non-employees with appropriate security instruction to facility users;
- Provision of readily available document destruction services or equipment and instruction of staff in use of these services or equipment;
- Timely destruction of non-essential documents containing non-public information;
- Removal of non-public information from storage areas and transportation of the information by library staff only as is essential for conduction of library functions;
- Avoidance of receipt of unneeded non-public information by library staff whenever possible and deletion and/or redaction of non-public information from necessary documents whenever possible;
- Return of documents containing non-public information to secure storage areas in a timely manner when not in use.

The following procedures and standards for electronic and technological security are required to ensure protection of non-public information:

- Maintenance of non-public information in secure electronic form rather than in paper form whenever possible;
- Measures by technology staff to ensure that public access to non-public information is not possible through the library networks, including the wireless communications systems;
- Limitation of sharing non-public information within the library staff and with external users to only sharing that which is necessary for conduct of library business and service;
- Limitation of non-public information storage to library-owned electronic equipment;
- Timely deletion of non-public electronic information with adherence to legal requirements for retention of library documents;
- Physical destruction of hard drives and other storage devices and/or media containing non-public information once they are removed from service;
- Use of high-security passwords and access codes to library computers and e-mail accounts;
- Secure storage of written passwords and access codes;
- Avoidance of e-mail and other electronic transmission of non-public information except when security measures such as encryption or secure transmission systems are utilized;
- Avoidance of fax transmission of non-public information whenever possible, notification of appropriate staff whenever it is necessary to fax documents containing non-public information, and verification of receipt of faxed non-public information by the intended recipient;

- Log-off or shutdown of computers when computers are not in use or are unattended.

Patron Non-Public Information

Patron non-public information includes but may not be limited to:

- Social Security number (we no longer ask for this information when issuing a library card)
- Other identifying numbers
- Home Mailing Address
- Phone Number
- E-Mail Address
- Circulation records

The following security procedures and standards are required to ensure protection of patron non-public information:

- Library staff members shall not release, publish, or disclose patron non-public information to any unauthorized parties and shall protect such information in accordance with relevant laws and regulations; they shall understand that violation of this requirement may subject them to criminal and civil penalties;
- The libraries shall not allow any non-staff member, including volunteers, access to the patron database;
- All computers that can access the patron database shall have proper passwords/ access codes;
- All computers that can access the patron database shall be shut down properly at the end of each day;
- The Library System and its affiliates comply with Georgia Code 24-9-46 which states that the records of patron transactions and the identity of registered library patrons are confidential material, and may only be released upon presentation of a legal court order--we are obligated to comply with state law even when law enforcement personnel may knowingly or unwittingly ask us to violate the law;
- As the patron database is not maintained locally, but is part of the statewide database maintained by Georgia Public Library Service in Atlanta, we have no control over security measures there. We will protect all information that is locally stored and used;

Reporting Information Loss

All library employees will immediately report the loss, possible loss, or exposure of non-public information to their supervisor upon determination that a loss, possible loss, or exposure has occurred. The supervisor will determine the nature and extent of the information loss or exposure and will immediately report the loss or exposure to the Library Manager, who will consult with the Regional System Services Director. They will determine the steps necessary to correct conditions relative to the loss or exposure and will determine notification steps that may be required.

EMERGENCY AUTHORITY POLICY

In cases of a management emergency at an affiliated library, the System Services Director will contact the Chairman and other officers of the appropriate board (the Executive Committee) as soon as possible to determine the course of action to be taken.

When the Executive Committee cannot be reached, or if immediate action is absolutely necessary in the judgment of the Director, he/she is authorized to intervene to the extent deemed necessary and appropriate.

Situations where exercise of such authority may become necessary include but are not limited to the following:

- 1 – Misuse, mismanagement, or embezzlement of public funds
- 2 – Mental health issues which may jeopardize the staff and/or public
- 3 – Situations that may result in endangerment of the public and staff
- 4 – Illegal activities
- 5 – Any activities that might damage the reputation of the library or the library system

The Director may appoint temporary management or act as temporary manager if necessary so that the library can continue operation.

The county library board will be fully informed of the situation and all actions taken at a called board meeting as soon as possible. Operations and responsibility for resolution of the situation will be turned over to the county board as soon as possible. In no case will regional emergency management remain in effect for more than 1 week. All regional board members will be apprised of the situation as soon as possible via email or by phone. A called meeting of the Northeast Georgia Regional Library Board will be held if necessary.

POLICY ON GIVING REFERENCES

Official references for employees of libraries in the Northeast Georgia Regional Library System will be released by the Affiliate Manager for an affiliate or by the Regional Director for the Regional Services Office. These references will consist of verification of dates of employment, the actual position held, the duties performed, and the salary of the employee. The question "Would you rehire this person?" will be specifically answered only if asked and if the employee has indicated in writing that that information can be released.

It is standard practice not to give references which reflect the institution. A supervisor may, however, give a verbal or written personal reference clarifying first that this is not a library or library system reference but a personal one.

If a current employee has informed the supervisor of his/her intent to interview outside the library system and has asked the supervisor to give a personal reference, the supervisor needs to talk with the employee (ahead of time) about the personal reference he/she is going to give.

When a personal reference is given, library letterhead and envelopes may not be used.

**Northeast Georgia Regional Library System
Policy on Equipment Capitalization and Inventory**

Adopted by the Northeast Georgia Regional Library Board of Trustees - January 24, 2006

With the exception of specific items or situations approved by the Regional Library Board of Trustees, the Northeast Georgia Regional Library System will follow the guidelines for tangible personal property (equipment) established for programs funded in whole or in part by state funds or U.S. Department of Education federal program funds. (Financial Management for Georgia Local Units of Administration, p.v.41-107)

Definition:

Equipment is a material item of a non-expendable nature, such as a movable unit of furniture or furnishings; an instrument or apparatus; a machine (including attachments); an instructions skill training device; or a set of small articles whose parts are replaceable or repairable, the whole retaining its identity and utility over a period of time which is characteristic of and definable for items of its class. It has a life expectancy of two or more years and a unit cost of \$5,000 or more.

Fixed assets include, but may not be limited to, all land, buildings, equipment, and library collections owned by the library. Purchased fixed assets are recorded at historical cost (or estimated historical cost if actual cost figures are not available). Donated or contributed assets are recorded at their fair market value on the date donated. For accounting purposes at the Northeast Georgia Regional Library System, fixed assets will refer to equipment, buildings, and land valued at \$5,000 and above. The general collection of books and materials is also a part of fixed assets.

Inventory Records:

Inventory records will include the following information:

- Description of the equipment
- Serial number
- Identification Tag Number
- Title holder
- Acquisition date
- Cost of the equipment
- Location
- Use and condition
- Any ultimate disposition data, including the date of disposal and sale price of the equipment

Disposal:

When furniture, equipment, and other fixed assets owned by the Northeast Georgia Regional Library System are no longer usable by any of the libraries in the system, they may be disposed of at public auction, by advertisement for sealed bids, or by other means whereby the general public may have an opportunity to purchase them. Items that are not bid upon or purchased, or that are damaged beyond repair, may be discarded. Items must be approved for disposal by the director. Items that are not bid upon may be discarded or given away at the discretion of the library director.

Books, videos, audiotapes, records, and any other library materials may be disposed of in books sales by the library. The Friends of the Library may sell books and other materials that have been discarded by the library in accordance with the Collection Development Policy, as well as those donated to, but unusable by the library. Funds raised by the sale of these materials are directed into the support of the library's materials collection or other resources for the advancement of the library's mission. Books and other materials that have not been purchased at the end of a sale may be retained for future sales, given to other libraries or institutions, or disposed of at the discretion of the library.

MANDATORY CHILD ABUSE/NEGLECT REPORTING POLICY

Under Georgia law, any person employed by or volunteering at an organization, public or private, that provides care, treatment, education, training, supervision, coaching, counseling, recreational programs, or shelter to children is a mandatory reporter of child neglect or abuse (O.C.G.A. § 19-7-5). Failure to do so could result in fines or imprisonment.

Because the libraries provide services to children, library employees are obligated under the mandatory reporting requirements of this law. In the event that an employee suspects that a child is in immediate danger, that employee should notify the police. In all other cases where abuse or neglect is suspected, the employee must notify the Library Manager, who will in turn report the abuse to the county Department of Family and Children Services ("DFCS"). If the Manager is inaccessible or for some reason the employee is unable to communicate with the Manager in a timely manner, the employee, or the person on duty responsible for library management, should make the report directly to the county DFCS.

In all cases, a complete written report will be filed with the Library System Director.

**RECORDS RETENTION SCHEDULE FOR NORTHEAST GEORGIA
REGIONAL LIBRARY SYSTEM**

Bank Statements, Cancelled Checks or Check Copies, Deposit Slips,
Reconciliations - 5 years

Budget File – Including budget requests, worksheets, other working papers, and
related correspondence - Retained permanently for historical purposes

Certificate of Deposit File – Retain until cancellation plus 2 years

Check Register File – 5 years

Financial Statements File – 5 years

General Ledger File – 5 years

Grant Accounting File – Final payment plus 5 years

Journal Entries File – 5 years

Bid and Quote File – 4 years

Invoices File – 5 years

Minutes – Retain permanently for legal and historical purposes

CONCLUSION

This policy repeals all current policies which would be in conflict with any section.

The date this policy will become effective is July 1, 1998.

In adopting this policy the NEGRLS will not penalize or release any current employee as a result of his being in violation of any part of this policy not in force on the effective date.

As outlined on page 5 of this handbook, NEGRLS in no instance condones discrimination. Any problems resulting from affiliated board policies not in compliance with the regional policy of nondiscrimination are the responsibility of the affiliated library board responsible for such policy.

All branch policy variations must be filed with the Regional Services Director for inclusion in Appendix G (Branch Variations) of this policy handbook. Deviation from policies adopted by the Regional Library Board as included in this document which do not expressly allow for affiliate variations shall result in all liability for lawsuits, settlements, legal costs, etc. becoming the responsibility of the affiliated county board making the variation.