

## Policy 2.1: Privacy of Patron Records

*Approved and Adopted by Board of Trustees December 11, 2025*

### Purpose

It is the policy of the Library to preserve the confidentiality and privacy of Library Records (“Library Records” or “Library Record”) to the fullest extent permitted by law.

### Definitions of Library Record

- A. **Agent or Employee.** An agent or employee includes an employee of the Library, a member of the governing body of the Library, an individual who is specifically designated as a volunteer and who is acting solely on behalf of the Library, and any other person who is lawfully performing services on behalf of the Library under a written contract, including a collection agency.
- B. **Crime.** A crime means that term as defined in section 5 of the Michigan penal code, 1931 PA 328, MCL 750.5
- C. **Law Enforcement Officer.** A law enforcement officer means an individual licensed under the Michigan commission on law enforcement standards act, 1965 PA 203, MCL 28.601 to 28.615.
- D. **Library Record.** As defined by the Michigan Library Privacy Act, for the purpose of this policy means:

“a document, record, or other method of storing information retained by a library that contains information that personally identifies a library patron, including the patron’s name, address, or telephone number, or that identifies a person as having requested or obtained specific materials from a library.”

For example, a Library Record would include, but not be limited to patron circulation records, internet browsing history, and program attendance records.

- Excluded from Definition. The following are specifically excluded from the definition of Library Record.
  - *Non-Identifying Material.* Library Record does not include non-identifying material that may be retained for the purpose of studying or evaluating the circulation of library materials in general.
  - *Certain Video Surveillance.* A Library Record also does not include recorded video surveillance images made solely for security purposes that do not include images of any activity or any other document or record that identifies a person as having requested or lawfully obtained specific services, materials, or information resources from the Library.

- District Director Determination of “Library Record.” The District Director, or his/her designee, shall be responsible for determining whether a particular document meets the definition of Library Record or whether the video surveillance footage contains any images that would require it to be considered a “library record.”