

Warren-Newport Public Library District

Lake County, Illinois

Board of Trustees

Policy 4040

Identity Protection

Adopted: March 15, 2011

Reviewed/Revised: September 17, 2013; September 16, 2014; October 21, 2014;
September 19, 2017

ARTICLE 1. PURPOSE

The Warren-Newport Public Library District (WNPLD) adopts this Identity Protection Policy pursuant to the Identity Protection Act, 5 ILCS 179/1 et seq. The Identity Protection Act requires each local government agency to draft, approve, and implement an Identity Protection Policy to ensure the confidentiality and integrity of social security numbers that agencies collect, maintain, and use. It is important to safeguard social security numbers (SSNs) against unauthorized access because SSNs can be used to facilitate identity theft. One way to better protect SSNs is to limit the widespread dissemination of those numbers. The Identity Protection Act was passed in part to require local government agencies to assess their personal information collection practices and make the changes to those practices necessary to ensure confidentiality of SSNs.

ARTICLE 2. SOCIAL SECURITY NUMBER PROTECTIONS PURSUANT TO LAW

Whenever an individual is asked to provide WNPLD with an SSN, WNPLD shall provide that individual with a statement of the purpose or purposes for which WNPLD is collecting and using the SSN. WNPLD shall also provide the statement of purpose upon request. That Statement of Purpose is attached to this Policy.

The WNPLD shall not:

- Publicly post or publicly display in any manner an individual's Social Security number. "Publicly post" or "publicly display" means to intentionally communicate or otherwise intentionally make available to the general public.
- Print an individual's Social Security number on any card required for the individual to access products or services provided by WNPLD.
- Require an individual to transmit his or her social security number over the Internet, unless the connection is secure or the social security number is encrypted.
- Print an individual's social security number on any materials that are mailed to the individual, through the U.S. Postal Service, any private mail service, electronic mail, or any similar method of delivery, unless State or federal law requires the social security number to be on the document to be mailed. SSNs may be included in applications and forms sent by mail, including, but not limited to, any material mailed in connection with the administration of the Unemployment Insurance Act, any material mailed in

connection with any tax administered by the Department of Revenue, and documents sent as part of an application or enrollment process or to establish, amend, or terminate an account, contract, or policy or to confirm the accuracy of the SSN. A social security number that is permissibly mailed will not be printed, in whole or in part, on a postcard or other mailer that does not require an envelope or be visible on an envelope without the envelope having been opened.

In addition, the WNPLD shall not*:

- Collect, use, or disclose an SSN from an individual, unless required to do so under State or federal law, rules, or regulations, or the collection, use, or disclosure of the SSN is otherwise necessary for the performance of the WNPLD's duties and responsibilities; and the need and purpose for the SSN is documented before collection of the SSN.
- Require an individual to use his or her SSN to access an Internet website.
- Use any SSN for any purpose other than the purpose for which it was collected.

ARTICLE 3. REQUIREMENT TO REDACT SOCIAL SECURITY NUMBERS

WNPLD shall comply with the provisions of any other State law with respect to allowing the public inspection and copying of information or documents containing all or any portion of an individual's SSN. WNPLD shall redact SSNs from the information or documents before allowing the public inspection or copying of the information or documents.

When collecting SSNs, the WNPLD shall request each SSN in a manner that makes the SSN easily redacted if required to be released as part of a public records request. "Redact" means to

* These prohibitions do not apply in the following circumstances:

- (1) The disclosure of SSNs to agents, employees, contractors, or subcontractors of a governmental entity or disclosure by a governmental entity to another governmental entity or its agents, employees, contractors, or subcontractors if disclosure is necessary in order for the entity to perform its duties and responsibilities; and, if disclosing to a contractor or subcontractor, prior to such disclosure, the governmental entity must first receive from the contractor or subcontractor a copy of the contractor's or subcontractor's policy that sets forth how the requirements imposed under this Act on a governmental entity to protect an individual's SSN will be achieved.
- (2) The disclosure of SSNs pursuant to a court order, warrant, or subpoena.
- (3) The collection, use, or disclosure of SSNs in order to ensure the safety of: State and local government employees; persons committed to correctional facilities, local jails, and other law-enforcement facilities or retention centers; wards of the State; and all persons working in or visiting a State or local government agency facility.
- (4) The collection, use, or disclosure of SSNs for internal verification or administrative purposes.
- (5) The disclosure of SSNs by a State agency to any entity for the collection of delinquent child support or of any State debt or to a governmental agency to assist with an investigation or the prevention of fraud.
- (6) The collection or use of SSNs to investigate or prevent fraud, to conduct background checks, to collect a debt, to obtain a credit report from a consumer reporting agency under the federal Fair Credit Reporting Act, to undertake any permissible purpose that is enumerated under the federal Gramm Leach Bliley Act, or to locate a missing person, a lost relative, or a person who is due a benefit, such as a pension benefit or an unclaimed property benefit.

alter or truncate data so that no more than five sequential digits of a SSN are accessible as part of personal information.

ARTICLE 4. EMPLOYEE ACCESS TO SOCIAL SECURITY NUMBERS

Only employees who are required to use or handle information or documents that contain SSNs will have access to such documents. All employees who have access to SSNs shall be trained to protect the confidentiality of SSNs from the time of collection through the destruction of the information.

What does the Warren-Newport Public Library District do with your Social Security Number?

Statement of Purpose for Collection of Social Security Numbers

The Identity Protection Act, 5 ILCS 179/1 et seq., requires each local government agency to draft, approve, and implement an Identity Protection Policy that includes a statement of the purpose or purposes for which the agency is collecting and using an individual's Social Security number (SSN). This statement of purpose is being provided to you because you have been asked by the Warren-Newport Public Library District (WNPLD) to provide your SSN or because you requested a copy of this statement.

Why does WNPLD collect your Social Security Number?

You are being asked for your SSN for one or more of the following reasons:

- Complaint mediation or investigation;
- Crime victim compensation;
- Vendor services, such as executing contracts and/or billing;
- Law enforcement investigation;
- Child support collection;
- Internal verification;
- Administrative services: employment eligibility verification, payroll and tax purposes, retirement and pension plan purposes, employment benefit plan purposes, and background checks; and/or
- Other _____

What does WNPLD do with your Social Security Number?

- We will use your SSN only for the purpose for which it was collected.
- We will not do any of the following:
 - Sell, lease, loan, trade, or rent your SSN to a third party for any purpose;
 - Publicly post or publicly display your SSN;
 - Print your SSN on any card required for you to access our services;
 - Require you to transmit your SSN over the Internet, unless the connection is secure or your SSN is encrypted; or
 - Print your SSN on any materials that are mailed to you, unless State or Federal law requires the number be on the documents mailed to you or unless we are confirming the accuracy of your SSN.

Questions or Complaints about this Statement of Purpose

Send correspondence to
Warren-Newport Public Library District
Attn: Executive Director
224 N. O'Plaine Road
Gurnee, IL 60031