

TITLE: Identity Protection Policy
POLICY NUMBER: 270
EFFECTIVE DATE: 10-18-23
REVIEW DATE: October 2026
SUPERSEDES: None



Article 1: Purpose

The Board of Trustees of the Waukegan Public Library complies with the provisions of the Identity Protection Act (5 ILCS 179/1 *et seq.*) which requires local governments to draft and approve a policy to ensure confidentiality and integrity in the collection and handling of Social Security numbers (SSNs) and to protect them from unauthorized disclosure.

Article 2: Requirements

Section 2.01 – Staff Training

All employees who have access to Social Security numbers (SSNs) in the course of performing their duties must be trained to protect the confidentiality of social security numbers. Training will include instructions on the proper handling of information that contains social security numbers from the time of collection through the destruction of the information.

Section 2.02 – Staff Access

Only employees who are required to use or handle information or documents that contain social security numbers will have access to such information or documents.

Section 2.03 – Restrictions to Public Access

Social Security numbers requested from an individual will be provided in a manner that makes the social security number easily redacted if required to be released as part of a public records request.

Section 2.04 – Reasons for Collection

When collecting a social security number, or upon request by the individual, a statement of the purpose or purposes for which the social security number is being collected and used must be provided.

Article 3: Prohibited Activities

No employee may engage in any of the following activities which are prohibited by law.

Section 3.01 – Posting or Sharing

Publicly post or publicly display in any manner an individual's social security number, which means to intentionally communicate or make available to the public.

Section 3.02 – Printing

Print an individual's social security number on any card required for the individual to access products or services.

Section 3.03 – Equipment

Encode or embed an individual's social security number in or on any cards or documents, including, but not limited to, using a bar code, chip, magnetic strip, RFID technology, or other technology.

Section 3.04 – Electronically

Require an individual to use their social security number to connect to the Internet or to transmit their social security number over the Internet, unless the connection is secure or the social security number is encrypted.

Section 3.05 – Mail

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.

Notwithstanding any provision in this section to the contrary, social security numbers 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 social security number. A social security number that may permissibly be mailed under this Section may 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.

Section 3.06 – Collection Guidelines

Collect, use, or disclose a social security number from an individual, unless:

- Required to do so under State or federal law, rules, or regulations, or the collection, use, or disclosure of the social security number is otherwise necessary for the performance of that agency's duties and responsibilities;
- The need and purpose for the social security number is documented before collection of the social security number; and
- The social security number is relevant to the documented need and purpose.

Section 3.07 – Other Uses

Use the social security number for any purpose other than the purpose for which it was collected.

Article 4: Exceptions to Prohibitions

Section 4.01 - Per Order

The disclosure of social security numbers pursuant to a court order, warrant, or subpoena.

Section 4.02 - Safety

The collection, use, or disclosure of social security numbers in order to ensure the safety of other employees.

Section 4.03 - Administration

The collection, use, or disclosure of social security numbers for internal verification or administrative purposes.

Section 4.04 - Other Legal Purposes

The collection or use of social security numbers 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 pension benefit or an unclaimed property benefit.

Article 5: Public Inspection and Copying of Documents

Notwithstanding any other provision of this policy to the contrary, all employees must 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 social security number. This includes requests for information or documents under the Illinois Freedom of Information Act. Employees must redact social security numbers before allowing the public inspection or copying of information or documents.

Statement of Purpose Collection of Social Security Numbers

The Identity Protection Act, 5 ILCS 179/1 et seq. requires the Waukegan Public Library to provide an individual with a statement of the purpose or purposes for which the library is collecting and using the social security number (SSN) anytime an individual is asked to provide the library with their SSN or if an individual requests it. This Statement of Purpose is being provided to you because you have been asked by the library to provide your SSN or because you requested a copy of this statement.

Why are we collecting your Social Security number?

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

What will we do with your Social Security number?

We will only use your SSN for the purpose for which it was collected.

We will not:

- 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 of your SSN is encrypted; or
 - 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.
- Notwithstanding any provision in this section to the contrary, social security numbers may be included in applications and forms sent 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 social security number. If mailed, your SSN will not be visible without opening the envelope in which it is contained.

If you have questions or complaints about this Statement of Purpose submit them to:

Waukegan Public Library
Attention: Executive Director
128 N. County St.
Waukegan, IL 60085
847-623-2041

ADDENDUM TO POLICY

Commented [TV1]: Addendum approved by attorney

While the Illinois Identity Protection Act and its provisions applies only to Social Security numbers, Waukegan Public Library handles other personal identifying information with care and confidentiality, and will not publicly disclose or share Individual Tax Identification Numbers (ITIN), I-9 paperwork, medical, and other personnel or patron information unless required by state or federal law, Freedom of Information Act, or other legally binding requirements.