

OP-23 – Artificial Intelligence (AI) Policy

Policy Type	Operational
Policy Number	OP-23
Policy Title	OP-23 Artificial Intelligence (AI)
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1. Purpose

Norfolk County Public Library (NCPL) may use Artificial Intelligence (AI) only where it supports library service, staff work, accessibility, digital literacy, operational efficiency, and responsible innovation. AI must be used in a manner that protects privacy, intellectual freedom, human judgment, equity, security, and public trust.

This policy establishes requirements for responsible, ethical, transparent, and secure AI use by or on behalf of NCPL. It is intended to align with Norfolk County Policy GP-30: Use of Artificial Intelligence and with applicable law and NCPL policies.

2. Scope

This policy applies to:

- all NCPL employees, volunteers, placement students, contractors, consultants, and presenters using AI for NCPL work or on NCPL systems;
- Library Board members when using AI for NCPL Board business or NCPL-related work products;
- AI tools, systems, or features procured, piloted, embedded, promoted, configured, or deployed by NCPL; and

3. Definitions

Artificial Intelligence (AI): A machine-based system that can generate output such as content, predictions, recommendations, classifications, or decisions from inputs it receives.

Generative AI: AI that creates or revises content, including text, images, audio, video, code, summaries, translations, prompts, metadata, or other digital outputs.

Approved AI Tool: An AI tool or AI-enabled function that has been approved by the CEO or designate, in consultation with Norfolk County Information Technology and other appropriate authorities where required for the intended NCPL use.

Public AI Tool: An AI tool available through a public or general online platform where prompts, files, inputs, or outputs may be processed by a third party, stored outside NCPL or Norfolk County systems, or used to improve or train the tool.

Personal or Confidential Information: Information about an identifiable individual, patron, employee, donor, vendor, partner, or community member, and any non-public NCPL, Norfolk County, Board, legal, procurement, security, HR, closed-session, donor-restricted, archival, or other sensitive information.

High-Risk AI Use: AI use that could materially affect a person's rights, access to services, employment, reputation, safety, privacy or financial interests, or that involves surveillance, biometric identification, automated decision support, security monitoring, personal or confidential information, or other significant legal, ethical or operational risk.

4. Policy Principles

Responsible and Approved Use

AI may be used only for approved NCPL purposes where the expected benefit is proportionate to the risk, and the use is consistent with NCPL's mission, values, and legal obligations.

AI must assist, not replace, library service, professional expertise, human judgment, Board accountability, or staff decision-making. NCPL will not use AI where a lower-risk, lower-impact or more appropriate method is reasonably available.

Privacy, Confidentiality and Security

NCPL has a heightened duty to protect patron privacy and confidentiality. Patron borrowing history, reference questions, technology use, program registration, images, security records, and other patron information must not be entered into public or unapproved AI tools.

Personal, confidential, sensitive, closed-session, HR, legal, procurement-sensitive, security, donor-restricted, archival, or municipal-election information must not be entered into public or unapproved AI tools.

AI use involving personal or confidential information requires prior written approval by the CEO or designate and the required Norfolk County information technology, privacy, records, legal, procurement, accessibility, or risk review.

Staff must use the minimum information necessary for an approved AI purpose and must anonymize, de-identify or aggregate information where appropriate.

Human Oversight and Accountability

Staff remain accountable for AI-assisted work they create, approve, publish, share, or rely upon.

Designated staff must review Material AI outputs before they are used for decision-making, public communication, Board materials, programming, catalogue or discovery work, local history or archival work, official records, procurement, reporting, or service delivery.

AI must not be the sole or final decision-maker for any matter affecting patrons, employees, volunteers, vendors, partners, community members, access to services, complaints, exclusions, employment, reputation, safety, privacy, or financial interests. Where appropriate, affected persons must have access to meaningful human review.

Transparency and Disclosure

NCPL will provide clear and accessible notice when AI is used in a material way in public-facing services, tools, exhibits, programs, communications, or decision-support processes.

Staff must disclose material AI use in public communications, Board reports, policies, program materials, images, exhibit content, analyses, or other work products using wording approved by the CEO or designate. Disclosure is not required for routine spelling, grammar, formatting, or accessibility checks unless the AI contribution is substantial or the context requires disclosure.

AI use must be documented where it supports a decision, public report, recommendation, procurement activity, service change, or high-risk process.

Equity, Accessibility and Intellectual Freedom

AI tools must not be used in ways that reinforce bias, discrimination, exclusion, harassment, stereotyping, or barriers contrary to the Ontario Human Rights Code, the Accessibility for Ontarians with Disabilities Act, intellectual freedom principles, or NCPL values.

NCPL will consider equity, accessibility, Indigenous rights and perspectives, viewpoint diversity, community impact, environmental impact, and public trust when approving, deploying, or reviewing AI tools.

AI-supported discovery, recommendation, catalogue, programming, communication, or collection-related tools must not undermine intellectual freedom, privacy, viewpoint diversity, community inclusion, or equitable access to library services.

Copyright, Licensing and Content Integrity

AI use must comply with Canadian copyright law, licence agreements, database terms of use, vendor terms, moral rights, privacy obligations, and NCPL intellectual property requirements.

Staff must not upload copyrighted, licensed, donor-restricted, unpublished, archival, confidential, or third-party material into an AI tool unless the tool, licence and intended use have been approved for that purpose.

AI must not be used to intentionally impersonate or imitate a living creator, patron, employee, local artist, presenter or community member without appropriate permission and review.

AI output must not be presented as authoritative unless it has been independently reviewed and verified through reliable sources and staff expertise.

Prohibited Uses

Unless expressly approved through the required high-risk review process and permitted by law, AI must not be used to:

- make final decisions about employment, discipline, hiring, performance, patron eligibility, access to services, complaints, exclusions, security responses or any matter affecting rights, interests, obligations or access;
- make collection, discovery, recommendation, programming, or access decisions without meaningful human review;
- input personal, confidential, closed-session, patron, employee, legal, procurement-sensitive, security, donor-restricted, archival, or municipal-election information into public or unapproved AI tools;
- create, approve, or distribute content that is false, misleading, discriminatory, defamatory, harassing, unsafe, unlawful, privacy-invasive, or inconsistent with NCPL values and policies;
- use NCPL-provided AI resources for non-work purposes, private business, political campaigning, candidate or party advocacy, or any purpose contrary to Norfolk County or NCPL policy; or
- circumvent procurement, information technology, privacy, records, cybersecurity, copyright, accessibility, human rights, communications, or approval requirements.

5. Approval, Procurement and Vendor Controls

No AI tool, AI-enabled platform or AI vendor service may be purchased, piloted, integrated, promoted for staff use or deployed for public use without the applicable NCPL and Norfolk County procurement, information technology, privacy, records, accessibility, and risk review.

High-risk AI uses require documented review and written approval by the CEO or designate, in consultation with Norfolk County Information Technology and any other required authority before implementation.

Vendor agreements for AI-enabled services must include appropriate safeguards for privacy, confidentiality, security, records, data use, model training, breach notification, retention, deletion, and accountability.

Approved AI tools and uses may be restricted, suspended, or withdrawn where legal requirements, vendor terms, risk, public impact, operational needs, or NCPL/County direction change.

6. Responsibilities, Training and Compliance

All staff are responsible for complying with this policy and related procedures, using only approved AI tools for approved purposes, protecting personal and confidential information, reviewing AI outputs before use, disclosing AI use where required, respecting copyright and intellectual freedom, and reporting suspected misuse or risk.

The CEO or designate is responsible for administering this policy, coordinating required review with Norfolk County authorities, maintaining any related procedures or approved-use records, and addressing reported concerns.

Designated staff must complete AI training or refresher training required by NCPL or Norfolk County before using AI tools where such training is required.

Suspected AI misuse, inaccurate or discriminatory output, privacy concerns, cybersecurity concerns, vendor data concerns, or policy breaches must be reported to a supervisor, the CEO or designate, and Norfolk County authorities where applicable.

Policy violations may result in removal of AI access, remedial training, investigation, corrective action, discipline up to and including termination for employees, termination of contracts or partnerships, or other measures appropriate to the relationship and circumstances.

7. Review

This policy will be reviewed annually, or earlier if required due to legislative, technological, operational, vendor, privacy, cybersecurity, accessibility, human rights, environmental or other risk developments.

8. Related Documents and Legislation

- Norfolk County Policy GP-30: Use of Artificial Intelligence
- Norfolk County Public Library Intellectual Freedom Policy (FN-04)
- NCPL and/or Norfolk County records management, protection of privacy, cybersecurity, information security, acceptable use, website, internet, and technology policies
- NCPL and/or Norfolk County code of conduct, human rights, accessibility, procurement, communications, and social media policies
- Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)
- Public Libraries Act, R.S.O. 1990, c. P.44
- Ontario Human Rights Code
- Accessibility for Ontarians with Disabilities Act, 2005
- Copyright Act
- Enhancing Digital Security and Trust Act, 2024 / Bill 194, where applicable
- Other applicable Norfolk County or NCPL policies, procedures, by-laws, and legislative requirements, as amended