## ALA Intellectual Freedom Committee Report to Council 2015 Annual Conference San Francisco, CA Tuesday, June 30, 2015

The ALA Intellectual Freedom Committee (IFC) is pleased to present this update of its activities.

#### **INFORMATION**

#### We Need Diverse Books and Intellectual Freedom

Eight out of the Top Ten Books challenged in 2014 had themes of diversity and race. What is it about these stories that people want them removed from libraries? Intellectual freedom is being stifled because multiple viewpoints aren't represented.

OIF has collaborated with We Need Diverse Books to provide authors and promotion for two programs at Annual Conference in San Francisco. Diverse Books Need Us and Diverse Authors Need Us. They have also worked with OIF to create a panel for the National Conference of African American Librarians with the help of the Black Caucus of ALA.

#### The Intellectual Freedom Manual, Ninth Edition

Editor Trina Magi of the University of Vermont has re-imagined and re-designed the 9<sup>th</sup> Edition of the Intellectual Freedom Manual for use as a practical guide for librarians in the field. As part of the redesign, the historical materials will be published as a separate supplement to the manual. It is available for purchase both online and at the ALA Store at Annual.

## Challenges to Library Materials Update

Kite Runner by Khaled Hosseini in North Carolina has been retained

Of Mice and Men by John Steinbeck in Idaho has been retained

Absolutely True Diary of a Part-Time Indian by Sherman Alexie in Iowa has been removed This Day in June by Gayle Pitman in Texas has been moved to the adult collection and is being appealed

My Princess Boy by Cheryl Kilodavis in Texas has been retained

Handmaid's Tale by Margaret Atwood in Oregon has been retained

King and King by Linda De Haan and Stern Nijland in North Carolina has been retained but the teacher who read the book and the assistant principal who provided the book have resigned

Parent's Rock organization challenged 4 books in Collier County, Florida; *Dreaming in Cuban* by C. Garcia, *The Bluest Eye* by Toni Morrison, *Killing Mr. Griffin* by Lois Duncan, and *Beloved* by Toni Morrison. All have been retained.

## Online Learning

With the publication of the 9<sup>th</sup> edition of the Intellectual Freedom Manual, OIF hosted a webinar with editors; Trina Magi and Martin Garnar and contributors; Deborah Caldwell Stone, Helen Adams, Sarah Houghton and Nanette Perez.

During ALA's School Library Month, OIF coordinated with AASL to profile and celebrate the successful challenge cases of four school librarians.

To help achieve its goal of educating librarians and the general public about the nature and importance of intellectual freedom in libraries, OIF will continue to host webinars on founding principles and new trends of intellectual freedom. Upcoming topics include

- Advocating Intellectual Freedom: Beyond Banned Books Week
- Embracing the Concerned Parent
- Preparing your Administration
- The Parenting Shelf

Every quarter there are web meetings to connect state IFC chairs and AASL IF affiliates. We discuss state, local, and national intellectual freedom issues; the projects and programs OIF and various chapter IFCs are working on; and how ALA can provide assistance and support to the state IFCs and members of state affiliates.

#### **Privacy Subcommittee**

The IFC Privacy Subcommittee completed the Library Privacy Guidelines for E-book Lending and Digital Content Vendors after a lengthy consultation with many other groups and it was approved by the committee and it will be available online. It is attached as additional information.

#### **PROJECTS**

#### Banned Books Week

OIF has partnered with SAGE again this year and hosted a Banned Books Virtual Read-Out booth. Over 200 people participated in the Read-Out. The videos will be made available via the Banned Books Week channel on YouTube at <a href="www.youtube.com/bannedbooksweek">www.youtube.com/bannedbooksweek</a>. OIF and SAGE also coordinated a Banned Books Week photo mosaic. The mosaic featured photos of people holding their favorite banned/challenged novel and was presented during Opening General Session.

Banned Books Week 2015 will take place September 27–October 3. Banned Books Week merchandise, including posters, bookmarks, t-shirts, and tote bags, are sold and marketed through the ALA Store and will be available online in the late Spring. More information on Banned Books Week can be found at www.ala.org/bbooks and www.bannedbooksweek.org.

## Choose Privacy Week

Now in its sixth year, Choose Privacy Week (May 1-7) is ALA's national public awareness campaign that seeks to deepen public awareness about personal privacy rights and the need to insure those rights in an era of pervasive surveillance. Choose Privacy Week is an opportunity for libraries to offer programming, online education and special events in order to give individuals opportunities to learn, think critically and make more informed choices about their privacy.

The theme for this year's Choose Privacy Week was "Who's Reading the Reader?" and focused on the privacy of library patrons. It featured a week-long online forum that included guest commentaries by librarians and privacy experts on the challenges of protecting reader privacy. These included Michael Robinson, chair, ALA-IFC Privacy Subcommittee on the importance of Choose Privacy Week; technologist, entrepreneur and writer Eric Hellman; Alison Macrina of the Library Freedom Project on personal password security; Marshall Breeding on online Catalogs, discovery services, and patron privacy; Gretchen McCord, attorney and librarian on aggregated data and anonymity; Michael Zimmer of the University of Wisconsin- Milwaukee's School of Information Studies on the NISO Patron Privacy Project to support patron privacy in digital library and information systems; and Erin Berman and Jon Worona of San Jose Public Library on using games to teach digital privacy literacy.

The IFC Privacy Subcommittee is working with the LITA Patron Privacy Interest Group to develop the themes and programming for next year's observance of Choose Privacy Week.

## **ACTION ITEMS**

The Intellectual Freedom Committee moves the adoption of the following action items:

CD # 19.3, Internet Filtering: An Interpretation of the *Library Bill of Rights* 

CD # 19.4, Labeling Systems: An Interpretation of the Library Bill of Rights

CD # 19.5, Rating Systems: An Interpretation of the Library Bill of Rights

CD #42 Resolution Against Mass Surveillance of the American People was referred to COL and IFC during Council I. IFC and COL jointly request that the following resolution be substituted in lieu of CD #42.

CD # 19.6, Resolution on the Passage of the USA Freedom Act and Reaffirming ALA's Commitment to Surveillance Law Reform

#### **INFORMATION ITEM**

Library Privacy Guidelines for E-book Lending and Digital Content Vendors In closing, the Intellectual Freedom Committee thanks the division and chapter intellectual freedom committees, the Intellectual Freedom Round Table, the unit liaisons, and the OIF staff for their commitment, assistance, and hard work.

Respectfully Submitted,
ALA Intellectual Freedom Committee
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## Internet Filtering: An Interpretation of the Library Bill of Rights

In the span of a single generation the Internet has revolutionized the basic functions and operations of libraries and schools and expanded exponentially both the opportunities and challenges these institutions face in serving their users. During this time many schools and libraries in the United States have installed content filters on their Internet access. They have done so for a variety of reasons, not least of which is the requirement to comply with the Children's Internet Protection Act (CIPA) in order to be eligible to receive federal funding or discounts through the Library Services and Technology Act, Title III of the Elementary and Secondary Education Act, and the Universal Service discount program (E-rate), or to comply with state filtering requirements that may also be tied to state funding. Their rationale for filtering is that it is better to have filtered access than no access.

CIPA specifically requires public libraries and schools seeking e-rate discounts for internet connections to install technology protection measures, i.e., content filters, to block two categories of visual images that are unprotected by the First Amendment: obscene images and images of child pornography. These are categories of images the Supreme Court has consistently ruled outside the constitutional protection of the First Amendment. CIPA also requires those libraries and schools to block a third category of images for minors under the age of 17 that courts deem "harmful for minors" that are constitutionally protected for adults but not for minors. CIPA does not require libraries and schools to block any other constitutionally protected categories of images, or any constitutionally protected categories of speech.

Research demonstrates that filters consistently both over and under block the content they claim to filter. Filters often block adults and minors from access to a wide range of constitutionally protected speech. Content filters are unreliable because computer code and algorithms are still unable to adequately interpret, assess, and categorize the complexities of human communication whether expressed in text or image. In the case of websites containing sexually explicit images, the success rate of filters is frequently no greater than chance. In addition, the use of content filters cedes vital library and school resource and service decisions to external parties (private companies and contractors) who then exercise unknown and unaccountable influence over basic functions of the library or school and users' access to library or school resources and services. In addition to this research, the experience of librarians and educators working within the constraints of CIPA suggests that filters are unreliable and routinely circumvented by technologically adept users.

Most content filters are designed and marketed for a much larger market than libraries and schools, and offer options for filtering wide categories of protected speech such as objectionable language, violence, and unpopular or controversial opinion, as well as entire categories of Internet-based services such as e-mail and social media. In addition many content filters operate on an "opt out" model where the filter defaults "on" unless the user is given the option to shut it off. Categories frequently are set to default to the most stringent settings and may only be adjusted by administrative intervention.

Unblocking for adults on request was a key factor in the Supreme Court decision to uphold CIPA in public libraries.<sup>2</sup> This has proved to be equivocal in actual practice in some libraries, because of the unwillingness or inability of libraries to unblock when requested, especially when system administrators may be outside of library administrative control. While some filtering systems allow librarians at the local or end user level to

modify the filter settings, others restrict that authorization to the highest administrative levels, creating lengthy delays in the processing of user requests to unblock erroneously filtered content.

This same situation also occurs in schools. Such delays represent de facto blocking for both library users and K-12 students, because most users rarely have the flexibility or time to wait hours or even days for resources to become available. This dilemma is exacerbated by the secrecy surrounding category definitions and settings maintained by the filtering industry, frequently under the guise of trade secrets. There are also issues of user privacy when users must identify themselves and their interests when asking for specific websites to be unblocked. Certainly, both adults and students researching highly personal or controversial topics will be reluctant to subject themselves to administrative review in order to have access to information that should be freely available to them.

In schools, the CIPA requirements have frequently been misinterpreted with the result of overly restrictive filtering that blocks many constitutionally protected images and texts. Educators are unable to use the wealth of Internet resources for instruction, and minor students are blocked from content relevant to their school assignments and personal interests. Interactive websites and social media sites are frequently restricted, and are thus unavailable to educators for developing assignments that teach students to live and work in the global digital environment. In many cases students are prevented from creating and sharing their documents, videos, graphics, music and other original content with classmates or the wider world; thus valuable learning opportunities are lost. These situations occur in schools when librarians, educators and educational considerations are excluded from the development and implementation of appropriate, least-restrictive filtering policies and procedures. Minor students, and the librarians and educators who are responsible for their learning experience, should not be blocked from accessing websites or web-based services that provide constitutionally protected content that meets educational needs or personal interests even though some may find that content objectionable or offensive. Minors and the adult educators who instruct them should be able to request the unblocking of websites that do not fall under the categories of images required to be filtered under the Children's Internet Protection Act.

CIPA-mandated content filtering has had three significant impacts in our schools and libraries. First, it has widened the divide between those who can afford to pay for personal access and those who must depend on publicly funded (and filtered) access. Second, when content filtering is deployed to limit access to what some may consider objectionable or offensive, often minority viewpoints religions, or controversial topics are included in the categories of what is considered objectionable or offensive. Filters thus become the tool of bias and discrimination and marginalize users by denying or abridging their access to these materials. Finally, when over-blocking occurs in public libraries and schools, library users, educators, and students who lack other means of access to the Internet are limited to the content allowed by unpredictable and unreliable filters.

The negative effects of content filters on Internet access in public libraries and schools are demonstrable and documented. Consequently, consistent with previous resolutions, the American Library Association cannot recommend filtering.<sup>3</sup> However the ALA recognizes that local libraries and schools are governed by local decision makers and local considerations and often must rely on federal or state funding for computers and internet access. Because adults and, to a lesser degree minors, have First Amendment rights, libraries and schools that choose to use content filters should implement policies and procedures that mitigate the negative effects of filtering to the greatest extent possible. The process should encourage and allow users to ask for filtered websites and content to be unblocked, with minimal delay and due respect for user privacy.

<sup>&</sup>lt;sup>1</sup> Kristen R. Batch. "Filtering Out Knowledge: Impacts of the Children's Internet Protection Act 10 Years

Later." (ALA OITP & OIF Policy Brief No. 5, June 2014).

<sup>2</sup> United States v. American Library Association, Inc., <u>539 U.S 194 (2003)</u>.

<sup>3</sup> "Resolution on the Use of Filtering Software in Libraries" (1997) and "Resolution on Opposition to Federally Mandated Internet Filtering" (2001)

#### **Labeling Systems**

An Interpretation of the Library Bill of Rights

The American Library Association affirms the rights of individuals to form their own opinions about resources they choose to read, view, listen to, or otherwise access. Libraries do not advocate the ideas found in their collections or in resources accessible through the library. The presence of books and other resources in a library does not indicate endorsement of their contents by the library. Likewise, providing access to digital information does not indicate endorsement or approval of that information by the library. Labeling systems present distinct challenges to these intellectual freedom principles.

Labels may be a library-sanctioned means of organizing resources or providing guidance to users. They may be as simple as a colored dot or strip of tape indicating reference books or fiction or as elaborate as the Dewey Decimal or Library of Congress call number systems.

Labels as viewpoint-neutral directional aids are intended to facilitate access by making it easier for users to locate resources. Users may choose to consult or ignore the directional aids at their own discretion. Viewpoint-neutral directional labels are a convenience designed to save time. These are different in intent from attempts to prejudice, discourage, or encourage users to access particular library resources or to restrict access to library resources. Labeling as an attempt to prejudice attitudes is a censor's tool. The American Library Association opposes labeling as a means of predisposing people's attitudes toward library resources.

Prejudicial labels are designed to restrict access, based on a value judgment that the content, language, or themes of the resource, or the background or views of the creator(s) of the resource, render it inappropriate or offensive for all or certain groups of users. The prejudicial label is used to warn, discourage, or prohibit users or certain groups of users from accessing the resource. Such labels sometimes are used to place materials in restricted locations where access depends on staff intervention.

Directional aids can also have the effect of prejudicial labels when their implementation becomes proscriptive rather than descriptive. When directional aids are used to forbid access or to suggest moral or doctrinal endorsement, the effect is the same as prejudicial labeling. Even well- intentioned labels may have this effect.

Prejudicial labeling systems assume that the libraries have the institutional wisdom to determine what is appropriate or inappropriate for its users to access. They presuppose that individuals must be directed in making up their minds about the ideas they examine. The American Library Association opposes the use of prejudicial labeling systems and affirms the rights of individuals to form their own opinions about resources they choose to read, view, listen to, or otherwise access.

## **Rating Systems**

An Interpretation of the Library Bill of Rights

Libraries, no matter their size, contain an enormous wealth of viewpoints and are responsible for making those viewpoints available to all. However, libraries do not advocate or endorse the content found in their collections or in resources made accessible through the library. Rating systems appearing in library public access catalogs or resource discovery tools present distinct challenges to these intellectual freedom principles.

## **Rating Systems**

Many organizations use or devise rating systems as a means of advising either their members or the general public regarding the organizations' opinions of the contents and suitability or appropriate age or grade level for use of certain books, films, recordings, websites, games, or other materials. Rating systems presuppose the existence of individuals or groups with wisdom to determine by their authority what is appropriate or inappropriate for others. Rating systems also presuppose that individuals must be directed in making up their minds about the ideas they examine. The creation and publication of such systems is a perfect example of the First Amendment's right of free speech. However, The American Library Association also affirms the rights of individuals to form their own opinions about resources they choose to read or view.

The adoption, enforcement, or endorsement, either explicitly or implicitly, of any of these rating systems by a library violates the Library Bill of Rights and may be unconstitutional. If enforcement of rating systems is mandated by law, the library should seek legal advice regarding the law's applicability to library operations.

Libraries often acquire resources that include ratings as part of their packaging. Librarians should not endorse the inclusion of such rating systems; however, removing or destroying the ratings—if placed there by the publisher, distributor, or copyright holder—could constitute expurgation (see "Expurgation of Library Materials: An Interpretation of the *Library Bill of Rights*").

Because AACRII, RDA and the MARC format provide an opportunity for libraries to include ratings in their bibliographic records, many libraries have chosen to do so – some by acceptance of standard records containing such ratings and others by a desire to provide the maximum descriptive information available on a resource. Libraries are not required by cataloging codes to provide this information. However, if they choose do so, whatever the reason, they should cite the source of the rating to their catalog or discovery tool displays indicating that the library does not endorse any external rating system.

The inclusion of ratings on bibliographic records in library catalogs or discovery tools may be interpreted as an endorsement by the library. Therefore, without attribution, inclusion of such ratings is a violation of the *Library Bill of Rights*.

The fact that libraries do not advocate or use rating systems does not preclude them from answering questions about such systems. In fact, providing access to sources containing information on rating systems in order to meet the specific information seeking needs of individual users is perfectly appropriate.

# Resolution on the Passage of the USA Freedom Act and Reaffirming ALA's Commitment to Surveillance Law Reform

Whereas the recent enactment of the USA FREEDOM Act of 2015 and the reforms that it will effect will significantly contribute to the necessary recalibration of the nation's privacy and surveillance laws to restore civil liberties lost upon passage of the USA PATRIOT Act;

Whereas passage of the USA FREEDOM Act accomplished only a small fraction of all such necessary change;

Whereas the ALA has previously vigorously committed itself to defend the privacy rights of library users and supported open government, government transparency, and accountability; and

Whereas both individually and collectively, librarians have the responsibility and ability to again contribute significantly to ending mass surveillance and to the passage of other critical additional surveillance law reforms through education of the public, professional practice, civic engagement, and political action; now, therefore, be it

**RESOLVED**, that the American Library Association, on behalf of its members:

- 1. commends the authors and primary supporters of the USA FREEDOM Act for their efforts, courage, and success in securing its passage;
- 2. recommits itself to the maximum possible restoration of the public's privacy and civil liberties through statutory and other legal reforms; and
- 3. reaffirms its commitment to fostering maximum transparency in all workings of government.

See, *e.g.*, Resolution Reaffirming the Principles of Intellectual Freedom in the Aftermath of Terrorist Attacks (2002); Resolution on the USA PATRIOT Act and Related Measures That Infringe on the Rights of Library Users (2003); Resolution on the Terrorism Information Awareness Program (2003); Resolution on the USA PATRIOT Act and Libraries (2005); Resolution on the Use and Abuse of National Security Letters: On the Need for Legislative Reforms to Assure the Right to Read Free of Government Surveillance (2007); Resolution on the Reauthorization of Section 215 of the USA Patriot Act (2009); Resolution on the Need for Reforms for the Intelligence Community to Support Privacy, Open Government, Government Transparency, and Accountability (2013); Resolution on Curbing Government Surveillance and Restoring Civil Liberties (2014); and Resolution Commends (sic) Sen. Patrick Leahy and Congressman James Sensenbrenner for Sponsoring the USA Freedom Act (2014).

#### **Library Privacy Guidelines for E-book Lending and Digital Content Vendors**

#### Introduction

Protecting user privacy and confidentiality has long been an integral part of the intellectual freedom mission of libraries. The right to free inquiry as assured by the First Amendment depends upon the ability to read and access information free from scrutiny by the government or other third parties. In their provision of services to library users, librarians have an ethical obligation, expressed in the ALA Code of Ethics, to preserve users' right to privacy and to prevent any unauthorized use of patron data<sup>i</sup>. Librarians and libraries may also have a legal obligation to protect library users' data from unauthorized disclosure.

Libraries enter into licenses or agreements with commercial vendors in order to provide library users access to digital information, including e-books, journals, and databases. Access to these resources is most often provided via networks and the internet. In the course of providing these services, most e-book and digital content vendors collect and use library patron data for a variety of reasons, including digital rights management, consumer analytics, and user personalization. Libraries and vendors must work together to ensure that the contracts and licenses governing the provision and use of digital information reflect library ethics, policies, and legal obligations concerning user privacy and confidentiality.

These guidelines are issued to provide vendors with information about appropriate data management and security practices in respect to library patrons' personally identifiable information and data about their use of digital content.

#### Agreements, Ownership of User Data, and Legal Requirements

Agreements between libraries and vendors should address appropriate restrictions on the use, aggregation, retention, and dissemination of patron data, particularly information about minors. Agreements between libraries and vendors should also specify that libraries retain ownership of all data and that the vendor agrees to observe the library's privacy policies and data retention and security policies.

Vendors are strongly encouraged to implement the principles of privacy by design, i.e. products and services should have privacy concerns "built in, not bolted on." In addition, agreements between libraries and vendors should reflect and incorporate restrictions on the potential dissemination and use of library patrons' records and data imposed by local, state, and federal law.

#### **Clear Privacy Policies**

Library users should be notified about vendor privacy policies when accessing a product or service. The privacy policies should be made easily available and understandable to users. Safeguarding user privacy requires that individuals know what information is gathered about them, how long it is stored, who has access to it and under what conditions, and how it is used. There should be a way to actively notify ongoing users of any changes to the vendor's privacy policies.

#### **User Consent**

The vendor should give users options as to how much personal information is collected from them and how it may be used. Users should have choices about whether or not to opt-in to features and services that require the collection of personal information. Users should also have the ability to opt-out and have their personal information erased if they later change their minds.

#### **Access to Personal Data**

Users should have the right to access their own personal information and contest its accuracy. Verifying accuracy helps ensure that vendor services that rely on personal user information can function properly. Guidance on how the user can access their personal data should be clear and easy to find. Patrons should also have the ability to download their personal data into an open file format such as CSV for their own use.

Access to personal information should be restricted to the user and conform to the applicable state laws addressing the confidentiality of library records as well as other applicable local, state, and federal law.

#### **Data Integrity and Security**

Whenever patron data is collected, the vendor must take reasonable steps to ensure integrity and security, including compliance with applicable statutory requirements.

**Security:** Security involves both managerial and technical measures to protect against loss and the unauthorized access, destruction, use, or disclosure of data. Security measures should be integrated into the design, implementation, and day-to-day practices of the vendor's entire operating environment as part of its continuing commitment to risk management. The vendor should seek compliance with published cybersecurity standards from organizations such as National Institute of Standards and Technology (NIST).

**Encryption:** The use of data encryption helps enhance privacy protection. All online transactions between client applications (web browsers, mobile apps, etc.) and server applications should be encrypted. In addition, any user data housed by the vendor off site (cloud-based infrastructure, tape backups, etc.) should use encrypted storage.

**Anonymization:** Data used for customer analytics and other types of analysis should be anonymized by removing or encrypting personally identifiable information. While data anonymization is a good practice, it is not foolproof (re-identification analysis has been used to identify individuals from anonymized data sets); therefore access should still be restricted.

**Retention:** User data should not be retained in perpetuity. The vendor should establish policies for how long to retain different types of data and methods for securely destroying data that is no longer needed. For example, accounts that are expired or inactive for a certain amount of time should be purged. Retention policies should also cover archival copies and backups.

**Data Sharing**: User data should not be shared with third-party vendors and other business associates without user consent. Most state statutes on the confidentiality of library records do not permit release of library patrons' personally identifiable information or data about their use of library resources and services without user consent or a court order. In addition, ALA policy forbids sharing of library patron information with third parties absent a court order.

**Government Requests:** The vendor should develop and implement procedures for dealing with government and law enforcement requests for library patrons' personally identifiable information and use data. The vendor should consider a government or law enforcement request only if it is issued by a court of competent jurisdiction that shows good cause and is in proper form. The vendor should inform and consult with the library when it believes is obligated to release library patrons' information unless prevented from doing so by the operation of law. The vendor should also inform users through its privacy policies about the legal conditions under which it might be required to release personally identifiable information.

**Company Sale, Merger, or Bankruptcy:** In the event that the vendor is sold to another company, merges with another company, or is dissolved through bankruptcy, all personally identifiable information should be securely destroyed, or libraries and their end users must be notified and given the opportunity to request that their data be securely destroyed.

#### **User Devices**

Privacy protections for library patrons' personally identifiable information and use data should extend to the user's device, including the web browser or any applications provided by the vendor. All communications between the user's device and the vendor's services should be encrypted. If the vendor wishes to employ personalization technology such as persistent cookies on its website or allows third-party web tracking, it should inform the user and give them the chance to opt-in before initiating these features for the user. If a vendor-provided application stores personally identifiable information or use data on the user's device, it should be encrypted. The user should be able to remove a vendor-provided application and delete any data stored on the device.

## **Audit and Notification**

Vendors should establish and maintain effective mechanisms to enforce their privacy policies. They should conduct regular privacy audits to ensure that all operations and services comply with these policies. The results of these audits should be made available upon request to libraries that are customers or potential customers. A vendor that suffers a breach in its privacy policies through inadvertent dissemination or data theft must notify the effected libraries and users about this urgent matter as soon as the vendor is aware of the data breach.

Approved by the Intellectual Freedom Committee 6/29/2015

<sup>&</sup>lt;sup>i</sup> "Patron data" or "user data" is any data or record that identifies the library patron or the patron's use of library information systems and resources.