

Town of Greater Napanee

Management Directive: Electronic Monitoring Policy



Effective Date:	November 9, 2022		
Revised Date:			
Review Scheduled:	November 9, 2023		
Department:	Human Resources	Contact:	Human Resources
Approval Authority:	CAO		

Introduction

The Town of Greater Napanee (The Town) is committed to maintaining a fair and transparent workplace. Through this policy, the Town is communicating to its employees its abilities and intended use in the collection, examination, and review of electronic monitoring information.

This Policy should be read alongside the Town’s various policies and procedures, applicable legislation, and any other policy that may become applicable and/or relevant.

Purpose

To inform employees where the Town of Greater Napanee may make use of electronic monitoring systems to ensure the health, safety, security, performance, and protection of Town equipment, property, information, personnel, and resources.

Scope

This policy applies to all Members of Town Council and Town employees, as defined by the Ontario *Employment Standards Act, 2000* (“ESA”), whether they are working remotely, traveling or working in a municipal Town building. For clarity, “employee” under this Policy means only those employees of the Town which are considered employees under the ESA.

Definitions

Active Monitoring refers to the ability and action of the Town to monitor electronic monitoring equipment and information in real-time.

Computer Monitoring refers to the practice of collecting use activity data on Town-owned computers, networks, and other IT infrastructure. This data includes, but is not limited to, web browsing history, files downloaded, data input, network traffic, logon to corporate systems, interactions with data, peripheral device usage, and information about the employee’s computer.

Data Collection refers to the automated or manual processing of employee data. This includes the collection, use, and storage of employee data such as computer activity data and other forms of personal information.

Electronic Monitoring shall refer to electronic systems that may be used to monitor the movement and work of employees including but not limited to building security codes and fobs, computer system log-in and usage, GPS technology, and video surveillance.

Employee collectively refers to any member of Council, directors, officers, managers, employees, other representatives, and agents including consultants and independent contractors of the Town

Passive Monitoring refers to the ability of the Town to review data collected by electronic monitoring devices

Personal Information refers to any data collected about an identifiable individual. This includes unclear data that, when combined with other information, could identify the individual.

Personal Use refers to an employee using company-owned devices, networks, and other assets for personal tasks such as non-work web browsing and sending personal emails.

Video Surveillance/Monitoring refers to surveillance by means of a camera that monitors or records visual images of activities on Town-owned property. Video surveillance does not include the capture of audio.

Employer Obligations

The Town will provide a copy of this policy to all employees within 30 days of implementation or change.

Employee Obligations

Employees are to comply with all safety and security policies and protocols as they relate to Town property and information, including its electronic equipment, resources and information.

Electronic Monitoring Systems

The Town utilizes a range of electronic monitoring systems to ensure the health, safety, security, performance and protection of Town equipment, property, information, personnel and resources. Use of Electronic Monitoring may be used to resolve complaints and/or investigations. Electronic Monitoring may be used to support or enforce any Town policy or procedure. All electronic monitoring systems are passively monitored and as deemed necessary are actively monitored. The following Electronic Monitoring Systems are utilized by the Town:

1. Building Security Systems – The Town monitors access to Town properties with the use of electronic fobs and security codes and motion sensors.
2. Video Surveillance – The Town utilizes mounted and mobile video surveillance at its locations, including job site locations, which may include video surveillance installed on town vehicles and drones.
3. Internet, Email and Communication Systems and devices – All use of Town internet, email and communication systems and devices are identifiable by user, device and device location, the Town has the ability to review correspondence, including internet page clicks and messages.
4. Computer systems, applications and programs – All use of Town computers, computer systems, applications and programs have the capabilities to track and record use and changes made by user, device and in some cases location of the device.

5. GPS Technology – Town vehicles and equipment, laptops and mobile devices are equipped with GPS technology. This information may be used to track and locate Town property and personnel as required.

Information gathered via the aforementioned electronic monitoring activities may also be used to assess productivity and in the investigation of alleged violations of the law, regulations, or applicable Company policies, procedures and expectations, or other instances of performance or misconduct.

Posting, Notice and Retention

The Town shall provide a copy of this Policy to each employee of the Town within thirty (30) calendar days of implementation. Should any changes be made to the Policy after its implementation, the Town shall provide each employee of the Town a copy of the revised Policy within thirty (30) days of the changes being made.

The Town shall provide a copy of this Policy to all new employees upon onboarding and within thirty (30) calendar days of the employee commencing employment with the Town.

The Town shall retain a copy of this and any revised version of this Policy for three (3) years after it ceases to be in effect.

Policy Implemented on: November 9, 2022

Reference Documents

[Bill 88, Working for Workers Act](#)

[Employment Standards Act, 2000, S.O. 2000, c. 41](#)

[Employee Code of Conduct](#)