



Electronic Monitoring of Employees

Adopted:
September 6, 2022

Last Reviewed/Revised:
September 6, 2022

Next Scheduled Review: 2025-2026

Associated Policies & Procedures: Ass

[I-43](#)

[VI-62](#)

[I-02 Records and Information Management](#)

[VI-82 Records and Information Management Procedure](#)

[I-07 Protection of Privacy](#)

[I-30 Video Surveillance](#)

[VI-02 Video Surveillance Procedure](#)

Purpose

The purpose of this procedure is to inform Halton Catholic District School Board (HCDSB) employees that HCDSB uses technology to monitor its technology resources in its physical and virtual locations. This procedure is consistent with the Ontario Education Act, the Employment Standards Act.

Application and Scope

This procedure applies to the mechanisms and the systems for data on HCDSB equipment used by HCDSB technology. The HCDSB may monitor and access electronic communications, Internet files, documents, and overall system use. The monitoring mechanisms ensure the security and integrity of HCDSB systems and data. This Administrative Procedure applies to all HCDSB staff, including third parties and trustees, who use HCDSB systems.

All electronic communication and Internet communications sent and received by users while using their HCDSB-provided credentials are the property of the HCDSB. Communications are not private or personal despite any such designation by the sender or the recipient, unless subject to specific legal or legislative requirements. Personal or private communications transmitted on the HCDSB's electronic information systems may be accessed, copied, deleted, retained, or disclosed at any time and without notice.

References

[Employment Standards Act, 2000](#)

[Municipal Freedom of Information and Protection of Privacy Act \(MFIPPA\)](#)

[Working for Workers Act, 2021](#)

Relevant Collective Agreements

Definition

Electronic Monitoring: The use of technology to keep track of digital activity on devices used to access HCDSB systems, to ensure that all employees comply with security, health and safety, and regulatory requirements (including applicable laws and regulations).

Principles

This Administrative Procedure is constructed to adhere to laws and regulations passed by the Province of Ontario and guidelines issued by the Ministry of Labour. Specifically, this procedure seeks to follow the Working for Workers Act 2021, along with any guidance provided by the Ministry of Labour, as amended from time to time.

Requirements

The HCDSB reserves the right to monitor and access electronic devices and systems used to access HCDSB systems. Further, the HCDSB reserves the right, without prior notice, to monitor any activity on any device at any time or location as long as the employee is using HCDSB-provided credentials. HCDSB reserves the right to monitor and access electronic devices and systems used to access HCDSB systems.

The right of the HCDSB to monitor and access electronic devices and systems used to access HCDSB systems may arise in the following circumstances, but not limited to:

- for HCDSB-owned technology because of regular or special maintenance of the electronic device or system;
- for HCDSB-owned technology, when the HCDSB has a business related need to access the employee's information, for example, when the employee is absent from work and otherwise unavailable;
- to comply with obligations to disclose relevant information in the course of a legal proceeding;



and when the HCDSB has reason to believe that there has been a policy violation or is

An electronic copy of this administrative procedure will be provided to each employee within 30 calendar days of implementation. Should any changes be made to the procedure after its implementation, each employee will be provided a copy of the revised procedure within 30 days of the revisions being made.

A copy of this procedure will be retained for three years after it ceases to be in effect.

APPROVED: Debra Martinich, Director of the Administrative Council

AUTHORIZED BY: _____
Director of Education and Secretary of the Board



Appendix A

Tool	Scope	How	Purpose
Web filtering	All internet traffic	Network management and monitoring tools	Protect from harmful and inappropriate content
Electronic Communications	Electronic communications traffic	Data Loss and	