

Topic:	Electronic Monitoring
Effective:	October 2022
Cross-Reference	<u>Code of Ethics Administrative Procedure;</u> <u>Social Media and Electronic Use for Staff Administrative Procedure;</u> <u>Privacy Breach Protocol Administrative Procedure</u>
Revision Date:	
Review Date:	
Responsibility:	Superintendent of Information Services Superintendent of Human Resources

INTENDED PURPOSE:

The Halton District School Board (“HDSB”) is committed to transparency with regard to electronic monitoring. “Electronic monitoring” refers to employee monitoring that is done electronically. This administrative procedure governs HDSB use of electronic monitoring.

Procedures:

1. This procedure applies to all employees, as defined by the Ontario *Employment Standards Act, 2000* (“ESA”). For clarity, “employee” under this procedure means only those employees of the Halton District School Board which are considered employees under the ESA. In addition, this procedure applies also to trustees where access to Board Facilities or Board Network or devices is available.

Electronic Monitoring Practices

2. The following table outlines the electronic monitoring technologies utilized by the HDSB:

Tool	Circumstances	How	Purpose
Email tracking	Continuous	Software records copies of all messages sent or received by addresses within the company’s domain	Network security
Electronic key system	Each scan	An electronic sensor creates a record each time an authorized user scans their card key and enters the employer’s premises	Facility security
Endpoint threat detection and response	Continuous	“ETDR” monitors the use of workstations (programs run, files read and written, etc.) and compares it against a baseline to detect abnormalities and potential unauthorized use.	Network security

Tool	Circumstances	How	Purpose
Video surveillance (facility)	Continuous	Cameras record video footage of specific areas within the Company's facility	Facility security
Video surveillance (investigation)	With reasonable grounds to suspect unlawful activity or breach of contract	Private investigators may be retained to document employee activity outside of work using video camera technology	To detect unlawful activity or activity in breach of employment contract
Network Traffic	Continuous	Network tools monitor and record traffic, incoming and outgoing traffic, from/to devices/endpoints/user connected to the HDSB Network(s)	Network security
Board Procured Software/Tools	Continuous	Software tools include audit capabilities that can monitor and report on areas like changes users have made, navigation of users within the system, potential location of users and devices. Including monitoring for users with escalated access.	Data protection and application security

- Nothing in this policy affects or limits the HDSB's ability to use information obtained through electronic monitoring.

Posting, Notice and Retention

- 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.
- This procedure will be provided to all new employees upon onboarding and within 30 calendar days of the employee commencing employment with HDSB.
- A copy of this procedure will be provided to employees assigned to perform work for HDSB within 24 hours of the start of the assignment or within 30 days of the Policy's implementation, whichever is later.
- A copy of this procedure will be retained for three years after it ceases to be in effect.