Greater Essex County District School Board

Policy: Electronic Monitoring

Reference No: P-HR-22

The Greater Essex County District School Board is committed to abiding by all of its obligations under Ontario's Employment Standards Act, 2000 (ESA), specifically those which apply to electronic monitoring. As such, GECDSB is committed to informing its employees about the presence (if any) of electronic monitoring software or equipment either in the workplace or contained on any of the organization's servers or programs.

This policy is based on Bill 88: Working for Workers Act, 2022 and is subject to change as per any new information provided by the Government of Ontario.

Greater Essex County District School Board

Regulation: Electronic Monitoring

Reference No: R-HR-22

This regulation applies to all employees, as defined by the Ontario *Employment Standards Act*, *2000* (ESA). In addition, this regulation applies also to Trustees where access to board facilities or board network or board devices is available.

This regulation is intended to specify:

- A description of how, why, and in what circumstances, GECDSB may electronically monitor employees, and
- The purposes for which GECDSB may use the information obtained through electronic monitoring.

This regulation offers standards to ensure the following:

- Employee safety and security;
- That the board operates efficiently; and
- That appropriate data is collected to make informed business decisions, as needed.

The Employment Standards Act, 2000 **(ESA)** requires transparency about whether employees are electronically monitored.

The ESA requirements do not:

- establish a right for employees not to be electronically monitored by their employer; or
- create any new privacy rights for employees.

Nothing in this regulation affects or limits the GECDSB's ability to use information obtained through electronic monitoring.

Electronic Monitoring Equipment in Place

GECDSB has the following electronic monitoring equipment in the workplace:

Tool	Circumstances	How	Purpose
Email monitoring software	Continuous	Software records copies of all messages sent or received by addresses within the GECDSB's domain	Network security
Internet and App activity monitoring	Continuous	Monitors employee network and computer activities to	To detect malicious or high-risk behaviours, monitor

		verify that GECDSB IT resources are used only for work related or professional activities	network performance, and avoid security incidents
Biometrics technology	Continuous	Windows Hello iPhone users Face ID	Device security
Video surveillance (facility)	Continuous	Cameras record video footage of specific public areas within the GECDSB facilities	Employee and student safety
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
GPS monitoring (equipment)	Continuous	GPS monitoring in GECDSB vehicles	To ensure employee safety and security
GPS monitoring (investigation)	With reasonable grounds to suspect unlawful activity or breach of contract	GPS monitoring in GECDSB vehicles	Reported employee misconduct
Electronic card (key) system	Each scan	An electronic sensor creates a record each time an authorized user scans their card (key) to gain access to GECDSB facilities	Facility security

Posting, Notice and Retention

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

This regulation will be provided to all new employees at orientation and within 30 calendar days of the employee commencing employment with GECDSB

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