
**MOOSE FACTORY ISLAND
DISTRICT SCHOOL AREA BOARD**

ADMINISTRATIVE PROCEDURE NO. 416	
Effective	February 22, 2023
Revision Date	

ELECTRONIC MONITORING OF EMPLOYEES

PURPOSE

The Moose Factory Island District School Area Board seeks to ensure the safety and efficiency of its operations. The Board uses electronic monitoring to protect the staff, students, and its technology, facilities, and property from harm.

This administrative procedure has been developed to provide transparency to all employees with regard to the electronic monitoring conducted by the Board in its physical and virtual locations. The supervisory officer, system administrators, and the school principal are committed to fulfilling their responsibilities under the *Working for Workers Act 2022*, the *Employment Standards Act 2000*, and any guidance provided by the Ministry of Labour.

DEFINITION

Electronic Monitoring: Electronic monitoring is the use of technology to keep track of digital activities to ensure an organization complies with security, health and safety responsibilities, and regulatory requirements.

APPLICATION

This procedure applies to all employees, as employees are defined by the *Ontario Employment Standards Act, 2000*. In addition, this procedure also applies to third parties and trustees where access to Board facilities or the Board network or devices is available.

PROCEDURES**1. Scope**

- 1.1. This administrative procedure describes how and in what circumstances the Moose Factory Island District School Board electronically monitors its employees, and the mechanisms and purposes for doing so.
- 1.2. There is no expectation of privacy in using the Board's technology. Communications are not private or personal despite any such designation by the sender or recipient, unless subject to specific legal or legislative requirements. The Board may monitor and access electronic communications, Internet history files, documents, and any system use. Communications may be accessed, reviewed, copied, deleted, retained, or disclosed at any time and without notice.

- 1.3. All electronic communication and Internet communications sent and received by users of the Board's systems are the property of the Board.

2. Purposes for Electronic Monitoring

The right of the Board to access any employee's Internet history, documents, and voicemail on Board-provided technology or personal devices when using Board credentials may arise in situations which include but are not limited to the following:

- a) to comply with legislative disclosure or access requirements under the *Municipal Freedom of Information and Protection of Privacy Act* and the *Personal Health Information Protection Act*, or to assist with the investigation and resolution of a privacy breach;
- b) for Board-owned technology because of regular or special maintenance of the electronic information systems;
- c) for Board-owned technology when the Board has a business-related need to access the employee's system, including, for example, when the employee is absent from work or otherwise unavailable;
- d) to comply with obligations to disclose relevant information in the course of a legal proceeding; and
- e) when the Board has reason to believe that there has been a policy violation or is undertaking an administrative, legal, or disciplinary investigation.

3. Posting, Notice, and Retention

- 3.1. 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 with a copy of the revised procedure within 30 days of the revisions being made.
- 3.2. This procedure will be provided to all new employees upon hiring and within 30 calendar days of the employee commencing employment with the Board.
- 3.3. A copy of this procedure will be retained for three years after it ceases to be in effect.

4. Electronic Monitoring Practices

See Appendix A for details of the Board's monitoring practices.

REFERENCE DOCUMENTS***Legal References:***

Working for Workers Act 2022

Employment Standards Act 2000

Municipal Freedom of Information and Protection of Privacy Act

Personal Health Information Protection Act

Education Act, section 283 Chief Executive Officer: Maintain Effective Organization

Education Act, section 286 Duties of Supervisory Officers: Supervise Property

Board References:

Board Policy GOV-01 Vision, Mission, and Values

Board Policy GOV-03 Role of the Board

Board Policy GOV-04 Role of the Supervisory Officer

Board Policy GOV-05 Delegation of Authority

Board Policy GOV-08 Learning and Working Environment: Safe Schools

Board Policy GOV-09 Safe Schools: Board Code of Conduct

Board Policy GOV-20 Access to School Premises

Board Policy GOV-26 Health and Safety

Administrative Procedure 147 Staff and Student Use of Technology

Administrative Procedure 215 Effective Use of Technology

Administrative Procedure 310 Personal Information of Students

Administrative Procedure 493 Workplace Conflict and Harassment

Administrative Procedure 534 Damage to School Property

Administrative Procedure 537 Key Control and Security

APPENDIX A

ELECTRONIC MONITORING PRACTICES

Tool	Circumstances	Method	Purpose
Electronic communications tracking	Continuous for all electronic traffic	Data loss and prevention tools. Device and management software records all messages sent or received within the Board's domain	Network security To prevent transmission of private or confidential data over insecure email
Electronic key system	Each scan	An electronic sensor creates a record each time an authorized user scans their card key and enters Board premises	Facility security
Video surveillance (facility)	Continuous	Cameras record video footage of specific areas within the Board's facilities	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 an employment contract
Filtering Network Traffic	Continuous for all network traffic	Network tools monitor and record traffic, incoming and outgoing traffic, from/to devices/endpoints/users connected to the Board networks	Network security; protection from harmful and inappropriate content
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.