



POLICY SECTION: ADMINISTRATION
SUB-SECTION:
POLICY NAME: EMPLOYEE ELECTRONIC MONITORING
POLICY NO: A.41

Date Approved:	Date of Next Review:	Dates of Amendments:
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Cross References:

1. *Education Act*
2. *Municipal Freedom of Information and Protection of Privacy Act*
3. *Personal Health Information Protection Act*
4. *Employment Standards Act, 2000*
5. Records Management & Archives Policy (A.20)
6. Acceptable Use of Technology Policy (A.29)
7. Municipal Freedom of Information and Protection of Privacy Policy (A.38)
8. Video Security Surveillance Policy (B.M.07)

Purpose:

The Toronto Catholic District School Board is committed to transparency in its employee electronic monitoring practices.

This Policy discloses how and in what circumstances the Board electronically monitors Employees and the purpose for which information obtained through electronic monitoring may be used by the Board.



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Scope and Responsibility:

This Policy is required by Part XI.1 of the *Employment Standards Act, 2000*.

This Policy applies to all Employees of the Board while using any Board owned or managed information technology or related services of any kind (“**Board Technology**”) either remotely or while on Board premises.

This Policy also governs the Board’s access to Employee data on its information technology, which means the hardware, software and services (including cloud services) that the Board provides to Employees so they can perform work, including on personally-owned electronic communication technology when used by Employees to access Board resources from any location (“**Network**”).

The Director of Education is responsible for the implementation of this Policy in alignment with the Multi-Year Strategic Plan, with the support of the Chief Information Officer and all supervisory personnel. All Employees and technology users share responsibility for compliance.

Alignment with MYSP:

Learning – Growing in Knowledge

Continue to develop a Christ-centered learning organization in pursuit of knowledge, innovation, and responsiveness.



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Equity – Growing in Knowledge with Justice

Apply Catholic social justice to nurture a community focused on equity, diversity, inclusion, anti-racism, and anti-oppression.

Well-Being – Growing in Knowledge with Justice and Hope

Strengthen an environment rooted in Gospel values that nurtures hope and well-being.

Policy:

It is the Board's Policy to be transparent with its Employees about its employee electronic monitoring practices.

Regulations:

1. **The Board engages in electronic monitoring of Board Technology and the Network**
2. **The Board does not routinely engage in the active electronic monitoring of Employees. The Board may permit the inspection, monitoring or disclosure of Board Technology and the Network in the following circumstances:**
 - a. **Inspection, monitoring, or disclosure that is required by or consistent with Board policies and procedures, applicable law, court orders or as otherwise required by law;**
 - b. **Where the Board has reasonable suspicion that a violation of law or**

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Board policies and procedures has occurred or may occur;

**c. Where the Board has a reasonable suspicion that a threat or threats to
Employees, workers or students have occurred or may occur;**

**d. Where there are time-dependent, critical operational needs related to
Board business, including in response to allegations of misconduct by
Employees, workers or students; and,**

**e. As part of the responsible management, maintenance, repair and
protection of Board Technology and the Network.**

**3. Information obtained from the electronic monitoring of Board Technology
and the Network may be used for all purposes consistent with Board
responsibilities. Such purposes include, but are not limited to, safety and
security, compliance with Board policies and procedures, compliance with
applicable law, as part of a reasonable investigation and responsible
management of the Board's infrastructure, systems and assets.**

**4. If Employee privacy is required, a personal device that is not connected to the
Network should be used.**



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5. The Board collects information about how Board Technology and the Network are used through a variety of tools, including those set out below. **The Board collects this information as part of routine management of its infrastructure, systems and assets.** Information may be logged for subsequent inspection, may generate alerts that are sent to IT staff or may **be** monitored by IT staff who have access to a dashboard and other reports.

Type of monitoring	Explanation
Computer and Network Tracking - Tools for filtering and logging traffic in and out of the Board’s network	Network monitoring provides data on who is communicating in and out of the Network , what type of application they are using to communicate, when they are using it, and whether the traffic may indicate a security problem.
Computer and Network Tracking - Tools for managing how applications and systems are used	Applications and systems (e.g. phone systems, student information system, financial system) monitoring typically provides data on who has used an application and when. Applications and systems may also track user actions, though this varies depending on the application or system
Computer and Network Tracking -Tools for managing and detecting anomalous	Device monitoring (e.g. anti-malware software, anti-virus software, device



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events on devices – <i>i.e.</i> , Board Technology, personal devices connected to the Network or using Board account credentials	management software and configuration tools) provides data to determine if a device is being used without authorization or if there is another problem on a device.
Video and Audio Recording	The Board employs video surveillance at some facilities for security purposes. For information about how and in what circumstances the Board uses video surveillance please see the Board’s <i>Video Security Surveillance Policy (B.M.07)</i> .
Access control systems	The Board employs electronic systems for controlling access to its facilities. If a Board facility is accessed using a Board access card, these systems will record the user identity, the point of entry and the time and date of entry.
Vehicle telematics (GPS) systems	The Board employs telematics in several Board owned and leased vehicles. These systems collect location data when vehicles are being used for work purposes. The Board uses this data to manage its vehicle fleet and uphold driver safety and security.

The Board collects the above information routinely and accesses it on an as needed basis and, **as noted above**, does not actively monitor Employees, as a matter of course.



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Definitions:

Board Technology includes any Board owned or managed information technology or related services of any kind, including all information and communication tools and applications.

Employee means employee of the Board, within the definition of the *Employment Standards Act, 2000*.

Network includes information technology: hardware, software, and services (including cloud services) that the Board provides to Employees so they can perform work.

Evaluation and Metrics:

The effectiveness of the policy will be determined by measuring the following:



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1. Ongoing consultation with union partners, educators, administrators and business leaders.
2. Feedback resulting from communication of policy.