



Electronic Monitoring of Employees

Human Resources

Purpose

The purpose of this policy is to be transparent about the Brantford Public Library's practices relating to the electronic monitoring of employees. This policy will describe how electronic monitoring of employees occurs and communicate the purposes for which the information obtained through electronic monitoring may be used.

Defined Terms

"Employee" means a person who works at the Brantford Public Library, either part-time or full-time.

"Electronic Monitoring" is a general term that refers to the technological surveillance of an individual or individuals. It includes all forms of employee monitoring that is conducted electronically.

Policy

1.0 Scope

This policy applies to all full-time and part-time employees of the Brantford Public Library, including probationary, temporary, permanent, and contract staff, as well as employees on leave. This policy applies to all Brantford Public Library branches and the broader workplace as defined in the *Occupational Health & Safety Act (OHSA)* and includes offsite work.

2.0 Systems with Electronic Monitoring Capabilities

- 2.01 The Brantford Public Library does engage in the electronic monitoring of employees, as defined within this policy. Monitoring occurs on work-issued/networked hardware, Library owned/operated software/apps, public online platforms owned/operated by the Library, and social media platforms.
- 2.02 The Library currently makes use of the following systems that are capable of electronically monitoring and collecting information relating to employees or their use of these systems:
 - Library network, hardware devices, and file storage and sharing systems;

- Email accounts (including individual accounts, shared accounts, and distribution lists that are issued and managed by the organization);
- Social media platforms, listservs, and message boards that the Library and/or staff participate in and/or post to;
- Chat, instant messaging and videoconferencing services available to staff for work purposes;
- Library website;
- Video surveillance cameras that monitor the Library's public areas, entrances/exits, and exterior property;
- Library telephones and work-issued cell phones;
- Scheduling, time and attendance, and training software;
- Staff Intranet;
- Integrated Library System;
- Security systems at Library facilities.

3.0 Use of Systems for Electronic Monitoring

- 3.01 The Library does not typically collect and review electronic data to monitor employees on a routine basis. The systems and programs that permit the Library to electronically monitor employees are intended primarily for the provision of services and productivity tools, and to meet technological infrastructure and security needs.
- 3.02 Electronic monitoring data will only be collected or used where there is reasonable cause to do so, and where the monitoring is appropriate and proportionate to the identified purpose. Monitoring activities will be limited to what is necessary to achieve that purpose, and will not be excessive in scope, duration, or intrusiveness.
- 3.03 Although it is not the primary purpose, the Library may use any available forms of electronic data for the purposes of:
- Supporting the evaluation of staff performance;
 - Identifying safety concerns;
 - Gathering information to analyze and improve Library operations and workflow;
 - Ensuring security of facilities and property;
 - Investigating complaints, suspected breaches of Library policy, or suspected criminal activity.
- 3.04 In appropriate cases, the Library may rely on data/information gathered through the Library's electronic monitoring systems to investigate (formally or informally) and discipline employees.
- 3.05 Any electronic data captured through employee monitoring will be treated as confidential. Access to monitoring data will be restricted to authorized personnel with a legitimate need to know and retained only as long as necessary.

4.0 Interpretation

- 4.01 This policy shall be read in conjunction with all collective agreements and contracts of employment to which the Library is a party.

- 4.02 If any collective agreement or contract of employment specifically limits the Library's ability to electronically monitor employees or to use electronic data to investigate or discipline employees, those contractual provisions will govern and the Library will comply with the terms of any contract of employment or collective agreement.

5.0 Posting Notice and Retention

- 5.01 The Library shall provide a copy of this policy to each employee within 30 calendar days of its implementation or within 30 days after any changes are made to this policy.
- 5.02 The Library shall provide a copy of this policy to all new employees within 30 calendar days of the employee commencing employment with the Library.
- 5.03 The Library shall retain a copy of this and any revised version of this policy for three years after it ceases to be in effect or such other time as may be prescribed by legislation.
- 5.04 This policy will be reviewed and updated in accordance with *Employment Standards Act (ESA)* requirements, ensuring compliance with the ongoing direction to have the policy in place by March 1st every year, as applicable.

History

Supersedes: Not applicable

Background documents, related policies: *Employment Standards Act (ESA)*; *Labour Relations Act*; *Occupational Health & Safety Act (OHSA)*; Brantford Public Library Employee Code of Conduct; Brantford Public Library Social Media Policy.

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