



## CORPORATION OF THE NATION MUNICIPALITY

### POLICY

**Policy Number:** POL-AD-01-2025

**Version Number:** V1

**Policy Title:** Electronic Monitoring of Employees

**Effective Date:** 2025-XX-XX

**Approval Authority:** CAO

**Resolution / By-law Number:** N/A

**Scheduled Review Date:** 2030-XX-XX

**Policy Contact:** Pierre Leroux, CAO

**Initiating Department:** Administration

**Abstract:** This policy outlines the Corporation of The Nation Municipality's approach to electronic monitoring of employees, specifying the types of monitoring used, the purpose, and its compliance with legislative requirements.

**Revision History:**

Date (YYYY-MM-DD)	Nature of Change	Approved by	Comments
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## Contents

1. Policy Statement .....	3
2. Purpose .....	3
3. Legislative Requirement.....	3
4. Scope .....	3
5. Legislative Authority .....	3
6. Definitions .....	3
7. Policy .....	4
8. Responsibilities .....	5
9. Administration .....	5
10. Exemptions (if applicable).....	6
11. Housekeeping Amendments .....	6
12. Errors or Omissions .....	6
13. Policy Review.....	6
14. Effective Date .....	6
15. References (if applicable).....	6
16. Approval .....	6

## 1. Policy Statement

The Corporation of The Nation Municipality (hereinafter referred to as the "Employer") utilizes electronic monitoring systems to enhance communication, facilitate operations, protect municipal assets, and ensure the safety and security of employees, clients, property, and resources.

## 2. Purpose

The purpose of this policy is to inform employees about the types of electronic monitoring used, the information collected, and its intended use. This policy also ensures compliance with applicable legislation while promoting transparency regarding employee monitoring practices.

## 3. Legislative Requirement

As mandated by the Working for Workers Act, 2022, and amendments to the Employment Standards Act, 2000, this policy has been established to fulfill the Employer's obligation to provide employees with a written policy on electronic monitoring.

## 4. Scope

This policy applies to all employees of The Nation Municipality, regardless of whether they work on-site, remotely, or are mobile. It may also apply to contractors or external service providers when using municipal systems or resources.

## 5. Legislative Authority

- a. Working for Workers Act, 2022
- b. Employment Standards Act, 2000
- c. Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)

## 6. Definitions

- a. **Electronic Monitoring:** Includes all forms of employee monitoring done electronically by the Employer.
- b. **Employer:** The Corporation of The Nation Municipality.
- c. **Employee:** Any individual performing work or providing services to the Employer for wages.

## **7. Policy**

The following electronic monitoring systems are utilized by the Employer:

### **7.1.1 Building Security Systems**

- a. Electronic security codes and key fobs control entry to municipal buildings.
- b. Monitoring is conducted for security and operational purposes, with access logs reviewed as needed.

### **7.1.2 Video Surveillance**

- a. The Employer uses video surveillance at its locations to enhance security.
- b. Footage may be reviewed for security investigations, property protection, and legal compliance.

### **7.1.3 Internet and Intranet Monitoring**

- a. The Employer monitors internet and intranet activity for cybersecurity, operational efficiency, and appropriate use of municipal resources.
- b. Logs of user activity may be reviewed for accountability purposes.

### **7.1.4 Electronic Communication Monitoring**

- a. Employer-provided communication systems (such as email and online chat) may be monitored for cybersecurity and compliance purposes.
- b. Text messaging on municipal devices is not actively monitored, but may be subject to review in exceptional circumstances, such as during a legal investigation or security concern.
- c. Communications may be reviewed for operational and legal requirements.

### **7.1.5 Computer Software and Platform Monitoring**

- a. Software usage is tracked to ensure compliance with municipal policies and cybersecurity best practices.
- b. Data may be analyzed to assess efficiency and security risks.

### **7.1.6 GPS Monitoring**

- a. Employer-owned vehicles are equipped with GPS tracking for safety, operational efficiency, and route optimization.
- b. GPS data may be used to verify employee movements during working hours and ensure compliance with municipal policies.

### **7.1.7 Cellular Phones and Phone Systems**

- a. Employer-issued cellular phones and internal phone systems (e.g., Microsoft Teams) are monitored for security and appropriate usage.

## **7.2 Use of Collected Information**

- a. Information collected through electronic monitoring may be used for operational oversight, security, and disciplinary actions if an employee contravenes corporate policies or the Employer's Code of Conduct.
- b. Monitoring does not create new privacy rights but ensures transparency and compliance with applicable laws.
- c. Information collected shall only be used for legitimate business purposes and handled in compliance with applicable privacy laws.

## **8. Responsibilities**

### **8.1 Employer Responsibilities**

- a. Ensure that electronic monitoring systems are used in compliance with applicable laws and municipal policies.
- b. Maintain transparency regarding monitoring practices and communicate any changes to employees.
- c. Provide employees with access to this policy via the corporate intranet (SharePoint and HR Downloads).
- d. Electronic monitoring may be conducted by the Employer or its authorized representative, including UCPR IT services, as required for security and operational purposes.

### **8.2 Employee Responsibilities**

- a. Employees must adhere to all municipal policies related to technology use, security, and workplace conduct, ensuring compliance with electronic monitoring guidelines.
- b. Employees shall be provided with reasonable notice of any significant changes to electronic monitoring practices.
- c. Use municipal resources appropriately and in compliance with this policy.

## **9. Administration**

The Chief Administrative Officer (CAO), in collaboration with the Human Resources and IT functions (including services delivered by UCPR), is responsible for the implementation, enforcement, and ongoing administration of this policy.

## **10. Exemptions (if applicable)**

This policy applies to all employees of The Nation Municipality. There are no specific exemptions at this time. Any exceptions shall be reviewed and approved by the CAO.

## **11. Housekeeping Amendments**

Minor, non-substantive updates to this policy (e.g., corrections to grammar, formatting, or outdated references) may be made by the Policy Contact without requiring formal approval, provided that the intent of the policy remains unchanged.

## **12. Errors or Omissions**

If any errors or omissions are identified in this policy, they should be reported to the Policy Contact. Clarifications or amendments may be made to ensure continued accuracy and compliance with legislation.

## **13. Policy Review**

This policy will be reviewed every five years or as required due to legislative changes and operational needs. Any amendments shall be communicated to employees within 30 days of adoption.

## **14. Effective Date**

This policy shall come into effect upon approval by the Chief Administrative Officer (CAO).

## **15. References (if applicable)**

- a. Ontario Employment Standards Act, 2000
- b. Working for Workers Act, 2022
- c. MFIPPA (Municipal Freedom of Information and Protection of Privacy Act)

## **16. Approval**

Approved by: Pierre Leroux, Chief Administrative Officer (CAO)

Signature: \_\_\_\_\_

Date: \_\_\_\_\_