

## **Electronic Monitoring**

Policy Number: **HR-11**

Initial Policy Approval Date: **Mar. 2023**

Last Review/Revision Date: **Mar. 2025**

Year of Next Review: **2027**

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The Port Colborne Public Library values trust, discretion, and transparency and believes employees deserve to know when and how their work is being monitored. This policy is to be used in conjunction with other policies and is intended to establish guidelines for Library practices and procedures related to the electronic monitoring of employees.

### **Section 1: Definitions**

1. **Employee:** a person who performs work for an employer for wages, as set out in the Employment Standards Act.
2. **Electronic monitoring:** includes all forms of employee and assignment employee monitoring that is done electronically.
3. **Personal information:** any factual or subjective information about an identifiable individual.

### **Section 2: Policy Statement**

The library has the capability to monitor library staff, but will only access such data under specific circulations as outlined below.

The City of Port Colborne provides electronic support for library operations including email, website, networking, cameras and surveillance recording. The City may conduct electronic monitoring and uses information gathered from such monitoring as follows:

#### **1. Cameras and Surveillance Equipment**

Video and audio transmissions and recordings are monitored, saved, and archived for security purposes, and to monitor compliance with applicable policies, procedures and expectations. Areas being monitored include all City-owned facilities (including the Library), buildings, and public parks which are considered workspaces for many City and, on occasion, Library employees.

## **2. Email and Website Activity**

The library uses the City's email and website services for Board purposes. The City may retrieve messages from City/Library email accounts or review websites visited during work hours in order to retrieve information following a computer failure, identify sensitive information leaving the organization, investigate acts of potential wrongdoing, and to monitor compliance with applicable policies, procedures, and expectations.

## **3. Handheld Devices**

Library staff use both City- and Library-issued handheld devices. The Board and the City may review all communications on devices that utilize the network, including telephone logs and internet usage.

## **4. General Provisions**

Other Purposes: Information gathered via the aforementioned electronic monitoring activities may also be used to assess productivity, protect the Board and the City's legal and business interests, and in the investigation of alleged violations of law, regulations, or applicable Board and/or City policies, procedures, and expectations, or other instances of misconduct. Any information collected by electronic monitoring may be used during performance reviews or during consideration of disciplinary decisions.

## **5. Privacy and Confidentiality**

All information collected through electronic monitoring will be securely stored and protected by the City on behalf of the Board where applicable. If any personal information is collected, its use and disclosure will be limited to achieve the stated purpose of its collection. The City will adhere to all privacy and confidentiality legislation that applies to the collection, use, and disclosure of personal information obtained by electronic monitoring.

## **6. Posting, Notice, and Retention**

- a) The CEO shall provide a copy of the Electronic Monitoring policy to each library employee within 30 calendar days of implementation.

- b) Should the City make any changes to its policy, the City shall notify the CEO immediately who will update the Board policy and provide each Library employee a copy of the revised policy within 30 days of the changes being made.
- c) The CEO shall provide a copy of this policy to all new employees upon onboarding and within 30 calendar days of the employee commencing employment with the library.
- d) All data collected pursuant to this policy will be retained in accordance with both the City's and Board's Record Retention policies.
- e) 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.

**Related Documents:**

- City of Port Colborne. Electronic Monitoring (CAP-73)