

SECTION: Human Resources		POLICY #: HR-007
Date Approved:		Electronic Monitoring
Revision Date:	Review Date:	
Authority: Report HR-07-22		

1.0 POLICY STATEMENT

Town of Hanover (the Town) uses digital technologies and equipment to electronically monitor certain work-related activities. The Town values trust, discretion, and transparency and is committed to adhering to provincial legislation and regulations as it relates to electronic monitoring in the workplace, and keeping employees informed about electronic monitoring that occurs in the workplace.

2.0 PURPOSE

This policy is intended to inform applicable parties of when and how electronic monitoring is used in the workplace, and the purpose of doing so.

3.0 SCOPE

This policy applies to all employees of the Town, including full-time, part-time, contract, casual, and students, as well as members of council, whether working remotely or physically in the workplace they report to.

This Policy should be read alongside the Town's associated policies and procedures including, but not limited to social media, information technology, and video surveillance, as well as any relevant and applicable legislation, or other policy or procedure that may become applicable and/or relevant.

4.0 DEFINITIONS

Electronic Monitoring: Using technological, electronic, or digital means to gather, track, observe, or monitor someone's actions.

Employee: For the purposes of this policy, applies to all individuals identified under the scope of this policy.

Personal Information: Any factual or subjective information about an identifiable individual.

5.0 ROLES AND RESPONSIBILITIES

5.1 Managers/Supervisors will:

- a) Uphold transparency of electronic monitoring that occurs in the workplace.
- b) Ensure the privacy of employees is respected while maintaining a standard of appropriate use of Town-issued devices, vehicles, and accesses.
- c) Discuss concerns related to this policy.
- d) Inform Human Resources of any changes to work equipment, practises or protocols which may impact this policy.

5.2 Employees will:

- a) Read and acknowledge this policy.

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- b) Use Town-issued devices, vehicles, and accesses appropriately, respectfully, and in compliance with applicable Town policies, procedures and guidelines.
- c) Discuss any concerns related to this policy with their Supervisor or Human Resources.

5.3 Human Resources will:

- a) Provide a copy of this policy to each employee within 30 days of preparing or amending this policy.
- b) Provide a copy of this policy to every new employee at the time of orientation within 30 days of the date of commencement of employment.
- c) Ensure that supervisors and employees are aware of, and comply with, related legislation in all jurisdictions such as the ESA and applicable collective agreements.
- d) Support problem solving where challenges are experienced in relation to this policy.

6.0 POLICY

The Town collects information through electronic monitoring for a variety of reasons to protect the company's legal and business interests. Electronic monitoring helps ensure compliance, security, information retrieval, and minimizes liability and insurance risks.

6.1 GPS in Town Vehicles

- a) Some of the Town's Public Works vehicles are equipped with Global Positioning System (GPS) tracking devices. These vehicles include:
 - i. Snow plows;
 - ii. Backhoe;
 - iii. Grader;
 - iv. Trackless machines; and
 - v. On-call pickup truck.
- b) Information collected using GPS includes vehicle locations, timing, and the level of salt and/or sand applied to road surfaces. The on-call pickup truck also includes a dashboard camera which can be turned on by employees to capture photos and/or live video.
- c) The Town uses GPS information to demonstrate compliance with required operations and road maintenance standards, and to investigate unusual activity, incidents, or complaints.
- d) GPS monitoring occurs in Public Works vehicles between the months of November and April each year to coincide with winter weather and increased maintenance requirements.

6.2 Town Computer and Email Activity

- a) While computer activity is logged and tracked, the Town does not actively engage in regular electronic monitoring of work-issued computers, unless specifically required due to security breach, unusual activity, incidents, complaints or retrieval of information.
- b) The following activities are logged, whether completed in-office or through VPN access:

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- i. All emails sent via Town-issued email addresses;
 - ii. All incoming emails sent to Town-issued email addresses;
 - iii. Files accessed on the Town network by each user;
 - iv. Time of logging in and out of the VPN system along with the user's IP address; and
 - v. Websites accessed via Town-issued computers along with the user's IP address.
- c) Email boxes are archived for employees with Town-issued email addresses upon termination of employment.

6.3 Town Phones and Mobile Devices

- a) Though incoming and outgoing phone calls are logged through the Town's partnership with phone service providers on phone bills, the Town does not regularly engage in active monitoring of use of Town-issued landline or mobile devices unless specifically necessary.
- b) Long distance calls are itemized on monthly phone bills, including the number called and the duration of the call.
- c) Local calls are not itemized on monthly phone bills but can be viewed by account administrators, if necessary.
- d) Monthly mobile device bills display the date data was used and the amount of data used on that specific date. However, the Town does not regularly engage in active monitoring of data usage.
- e) Any emails sent or received via mobile phone, tablet, or other device, are logged in accordance with Section 6.2 of this policy.
- f) Monitoring or investigation is only completed if specifically required due to security breach, unusual activity, incidents, complaints, or for retrieval of information.

6.4 Video Surveillance

- a) The Town recognizes the balance between right to privacy and the need to protect the safety and security of employees, the public, and property. Video surveillance is present in and around a number of municipal properties in which employees are present, including:
 - i. Public areas of the P&H Centre, including customer service desk (not in restrooms, change rooms, or offices);
 - ii. Landfill;
 - iii. Public areas of the Civic Centre (not in rest rooms or offices); and
 - iv. Public areas of the Hanover Medical Clinic (not in rest rooms or exam rooms)
- b) Information on the use and disclosure of video surveillance information is detailed within ADM-020 Video Surveillance Policy.

6.5 Fire Department Monitoring

- a) Data or information related to items electronically monitored by the Hanover Fire Department is accessed only if specifically required due to security breach, unusual activity, incidents, complaints, for retrieval of information, or for training purposes.
- b) Hanover Fire Department uses applications to track firefighter location using location services enabled

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on each user's mobile device when an emergency call is received. The application is used to determine if firefighters are able to respond to emergency calls and their distance from the fire station. This tracking can be viewed by all users of the application and aids in planning effective and timely emergency response.

- c) An accountability application is used during emergency response to track the location of firefighters within structures for overall scene safety.
- g) All apparatus contain a device that tracks vehicle operations including speed, seat belt use, emergency lighting, brake application, etc.
- d) Video dash cameras are installed in all apparatus to record all activity when the apparatus is operational. Video recording is also available through use of tablets on scene.
- e) GPS tracking is installed on all portable radios as well as the boat radio. This is for location tracking during emergencies for safety purposes.
- f) Officers have access to helmet cameras that can be used to record video for training and reference purposes.
- g) A drone with photo and video capabilities may be used to assist in emergency response and for training and reference purposes.
- h) Specific radios have record capabilities.
- i) Dispatch records all incoming and outgoing communications.

6.6 Privacy and Confidentiality

- a) Access to information collected through electronic monitoring is restricted to applicable parties who require such access.
- b) Electronic monitoring completed by the Town is aimed at collecting information related to its operations. However, some information collected by electronic monitoring may be considered personal information.
- c) All personal information collected through electronic monitoring will be securely stored and protected. If any personal information is collected, its use and disclosure will be limited to achieve the stated purpose of its collection, and will be done so in compliance with the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) and other related legislation.

RETENTION

In compliance with the Employment Standards Act (ESA), the Town will retain a copy of every written policy on electronic monitoring that was required by the ESA for at least three years after the policy is no longer in effect.

REVIEW FREQUENCY

This policy will be reviewed every 4 years, at minimum, or more frequently as needed to maintain an effective and compliant policy.

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RELATED DOCUMENTS

HR-001 Personnel Policy

HR-002 Employee Code of Conduct

ADM-008 Information Technology & Mobile Devices

ADM-020 Video Surveillance Policy