

Manual of Administration

| | | |
|----------------------------------|--|------------------------------------|
| TOPIC: Human Resources | SUBJECT: Electronic Monitoring Policy | Code: HR100 |
| | | Date of Issue: October 2022 |
| | | Revised: |
| | | Page 1 of 3 |

POLICY

Avenue II maintains ownership over all Avenue II's Technology and all data created, sent, received or stored on or using Avenue II's Technology. As an organization of more than 25 employees as of January 1, 2022, Avenue II is required to have this policy in place regarding Electronic Monitoring (as defined herein) effective November 10, 2022.

This Policy is intended to outline the Agency's approach to Electronic Monitoring, in accordance with the requirements of Ontario's *Employment Standards Act, 2000*. All Employees (as defined herein) must read this policy in conjunction with the following policies:

- Video Surveillance Recording
- E-mail, Network and Computer Use
- Cell Phone Use

SCOPE

Avenue II's Electronic Monitoring Policy applies to all Staff. This Policy applies equally whether the Staff is performing work at a physical Agency location, is Working Remotely (as defined below), Working in the Community or any combination of three.

DEFINITIONS

"Electronic Monitoring" includes all forms of Employee monitoring that is done electronically. This includes, but is not limited to, tracking employee communications and location or activities through various devices, such as video cameras, computers, and cell phones.

POLICY LIMITS

Note that this policy:

- does not establish a right for Employees not to be Electronically Monitored by the Agency;
- does not create any new privacy rights for Employees; and,
- does not affect or limit Avenue II's ability to use information obtained through the Electronic Monitoring of Employees as may legally be permitted or required.

| | | |
|--------------------------------------|--|------------------------------------|
| TOPIC: Human Resources | SUBJECT: Electronic Monitoring Policy | Code: HR100 |
| | | Date of Issue: October 2022 |
| | | Revised: |
| | | Page 2 of 3 |

PROCEDURES

Subject to compliance with applicable legislation, including the *ESA*, Avenue II may from time to time, electronically monitor its Employees.

The purposes for which monitoring, and information gathered through monitoring may be used include the following:

- Ensuring the whereabouts, health and safety of staff while on duty;
- To investigate workplace issues, incidents of concern, allegations of abuse and implement corrective measures.

This section outlines the purpose and how Avenue II may engage in Electronic Monitoring.

| Electronic Monitoring Equipment | Circumstances/Purposes | How |
|--|---|---|
| Video cameras and recording equipment in public areas | To investigate workplace issues and incidents of concern, allegations of abuse and implement corrective | Through video footage recorded on cameras installed |
| Internet and app activity monitoring, including downloaded documents and accessed websites | Ensure proper and safe use of Avenue II's internet and website usage | Through programs and platforms that identify improper use or activity. |
| Recording equipment on all agency phones for external calls and Avenue II provided cell phones | To ensure Agency provided phones are used for Agency purposes only | Through reviewing invoices and from services provided by external providers. |
| Oversite and review of agency email accounts as needed. | To ensure Avenue II email is used appropriately and does not violate any internal policy. | Random review of email accounts by external provider in addition to admin review. |

| | | |
|----------------------------------|--|------------------------------------|
| TOPIC: Human Resources | SUBJECT: Electronic Monitoring Policy | Code: HR100 |
| | | Date of Issue: October 2022 |
| | | Revised: |
| | | Page 3 of 3 |

POLICY DISTRIBUTION, RETENTION AND FEEDBACK

- A) Distribution.** Avenue II will ensure communication of the policy to Employees within thirty (30) days of the Policy's implementation. If any changes are made to this policy, all Employees will be provided with a written copy of the updated policy within 30 days of any amendments and notified of the updated policy within 30 days of any amendments. Newly hired Employees will be provided a copy of this policy to them within 30 days of their date of hire.
- B) Retention.** Avenue II will ensure that the policy reflects the date of initial creation and that all subsequent versions reflect the dates of any amendments and ensure retention of the policy for at least three years after it ceases to have effect and otherwise comply with document retention policies.
- C) Feedback.** Employees who have questions or concerns with respect to electronic monitoring should speak with their supervisor.