



Policy Title	Electronic Monitoring Policy
Issued By	Human Resources
Contact	Director of Human Resources
Approved By	President, Brescia University College
Effective Date	October 11, 2022
Last Review	November 11, 2022
Next Review	October 11, 2024

Purpose:

To provide details on electronic monitoring of employees by the employer.

Policy:

Brescia University College values trust, discretion, and transparency and believes employees should have knowledge of when and how their work is being monitored. This policy is to be used in addition to Western’s Computer and Internet Acceptable Use Policy and Brescia’s Social Media Policy and is intended to establish an outline of practices and procedures related to electronic monitoring of employees.

Electronic Monitoring Practices

Brescia University College collects information through electronic monitoring for a variety of reasons, including protecting legal and business interests. Information collected by electronic monitoring may be used during employee investigations, during consideration of disciplinary decisions, for safety and security purposes, and as required by law.

Brescia electronically monitors the following activities and procedures:

- Video Cameras: Video cameras are located in various public areas at Brescia. These include entranceways, hallways, and outdoor locations such as parking lots. The purpose of monitoring is for campus security.
- Access Cards/Fobs: Western ONE cards and key fobs provide electronic access to enter Brescia buildings and some rooms on campus when locked or outside of regular business hours. The purpose of monitoring is campus access rights and security.
- Computer ID Login: Computer ID login provides user access to network resources. The purpose of monitoring is for computer access rights and security.
- Software Programs: Most software programs maintain an electronic record of access, and or save work periodically. Software electronic records of access may provide data to departments or ITS to assist users.

To promote impartiality, and to ensure any information collected through electronic monitoring is handled appropriately, Brescia University College monitors these activities by:

- Video Cameras:** Clare Hall Front Desk and Western Campus Security have 24/7 monitoring capability from camera audio and video live feeds. Recordings are stored. Western Campus Security maintains access rights for the authority to review recorded footage.
- Access Cards/Key Fobs:** Brescia Facilities maintains access rights for employees and others that require building access through the activation/deactivation of Western ONE access cards and assigned key fobs.
- Computer ID Login:** Computer login access rights are maintained for employees through Brescia HR and Brescia and Western ITS to activate, verify, or deactivate employee user access rights to utilize network resources. Collected or stored data may include access login details including computer login times and dates.
- Software Programs:** Collected or stored data may include, and is not limited to, user entered data, the date and time of a request, the name and internet protocol address (“IP address”) of the requesting device, the name and IP address of the digital resource being requested, and the physical location of the requesting device. This information may be used to assist users with troubleshooting, prevent exposure to cybersecurity threats, provide services to the Brescia community or provide reporting data. Examples of software that stores user data and may be accessed or monitored include:

Adobe Software
Brescia Website and Forms submissions
Employee Self Service (ESS)
EventWorx
HRDownloads
HRMS
JIRA
Microsoft 365 (Microsoft 365 platform retains logs of text, video, and audio communications on the Teams application)
Microsoft Office Products
Omni CMS
OWL
Raiser’s Edge
ROAMS
Sage ERP
Salesforce CRM
Shared Calendar (user choice)
Volante

Note: this is not an exhaustive list

To promote transparency Brescia University College does not actively monitor these activities:

Documents and Data Backup:	All network drives and associated data is backed up to Western servers. Copies of documents/drives may be obtained or restored by Brescia or Western ITS. Brescia does not utilize monitoring software for documents saved to network drives.
Email:	Emails are stored in Western's Microsoft server and may be accessed for troubleshooting or restoring when required. Brescia does not actively monitor employee email.
Downloads:	Brescia does not utilize monitoring software for downloads to Brescia computers, however downloading access is limited for computer security.
Websites:	Brescia does not utilize monitoring software for accessed websites, however security layers may prevent or provide warnings for unsafe connections.
Social Media:	Brescia monitors institutional social media and the use of Brescia's name and activities in social media. Brescia does not actively monitor individual employee personal social media accounts but may respond to reported posts, such as harassment or discrimination as noted under Brescia's Social Media Policy.
Keystroke, keyboard or mouse trackers:	Brescia does not utilize keystroke, keyboard, or mouse tracking software.

Privacy and Confidentiality

Brescia's monitoring is aimed at collecting information related to its business, providing or denying user access, and to provide services and troubleshooting help. Some information collected by electronic monitoring may be considered personal information.

All 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. Brescia adheres to all privacy and confidentiality legislation that applies to the collection, use, and disclosure of personal information or research data obtained or accessed by electronic monitoring.

Definitions:

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

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

Audience/Scope:

This Policy applies to all employees of Brescia University College. For clarity, “employee” under this Policy means only those employees of the University who are considered employees as defined by the Ontario Employment Standards Act, 2000 (“ESA”).

This Policy does not provide employees any new rights or right to not be electronically monitored. Nothing in this Policy affects or limits the University’s ability to conduct electronic monitoring, or use information obtained through electronic monitoring.

Nothing in this Policy is intended to amend or supersede any grievance procedure or other aspect of any applicable collective agreement.

Relevant Legislation:

Ontario Working for Workers Act, 2022, S.O. 2021, c. 7 – Bill 88

Ontario Employment Standards Act, 2000, S.O. 2000, c. 41

Ontario Occupational Health and Safety Act, R.S.O. 1990, c. O.1