

Vice-President Finance and
Administration

Executive Team

October 4th, 2022

Not applicable

1. Purpose

This Policy on Electronic Monitoring (the "Policy") is intended to:

State Laurentian University of Sudbury's (the "University") commitment to clear, concise and transparent sharing of information related to the uses of, and reasons for, electronic monitoring of employees on the University infrastructure, information systems and end-user devices; and

Meet the requirements of Electronic Monitoring under the
of Ontario as defined by Bill 88,

2. Scope

This Policy applies to all Laurentian University (hereinafter referred to as "the Employer") employees, in any capacity, as defined by the term "employee" under the
and shall hereinafter be referred to as Employee(s).

This Policy will not cover items that the Employer deems to be the normal course of business operations or in the course of performing its fiduciary duty to implement technical, financial and operational controls to monitor transactions or ensure compliance (e.g. monitoring of purchases on a corporate credit card).

3. Principles

Electronic Monitoring measures, are:

In response to a legitimate academic or research need;

Protecting an employee's digital safety and data privacy;

For quality control, quality assurance programs, continuous improvement and/or business analytics; and,

Used for workforce and capacity planning

3.2 Definitions

“ ” - means all University owned and operated spaces, including, but not limited to: offices, student residences, classrooms, labs, study spaces, libraries, recreational facilities, dining halls and eateries, buildings, building entrances, loading docks, University vehicles and outdoor areas.

“ ” - the collection and/or use of information about an employee by an employer, for the benefit of an employer, by means of electronic equipment, software (including those managed or hosted by a third-party, e.g cloud software) or electronic network.

“ ” - Laurentian University of Sudbury and all subsidiaries and affiliate groups subject to organizational policies, standards and procedures.

“ ” - an individual who performs work, in any capacity, for an employer (“Laurentian University”) as defined by the of Ontario. Without limiting the generality of the foregoing, this includes paid and unpaid employees, contractors, temporary assignment and digital workers, who work on campus, remotely or in a hybrid capacity.

“ ” - the intentional tracking of activities and events, usually in real time, including without limitation: audit logs, audio and video files, camera footage, physical entry á

4. Policy Statement

4.1 General

The employer will only actively electronically monitor its employees for reasons listed in section 4.2 and in congruence with the principles and uses of monitored data in section 3.

The employer shall use the recorded events and activities for the purpose for which it was obtained and communicated and where its purpose remains consistent.

The employer shall make every effort to inform the employee, using explicit statements and warnings, where technology permits, or using awareness and training, that an employee is
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This Policy may be amended, by the University at its own discretion, at any time for any reason. Amendments to the policy will be shared with employees at least thirty (30) calendar days before the changes are in effect.

The employer shall retain a copy of this Policy and any subsequent versions for a period of three (3) years after it ceases to be in effect.

4.2 Types of Electronic Monitoring

The University will, in general terms, electronically monitor the following systems, events and activities:

CCTV/ Security management	University campus cameras record video footage of various areas, (indoors and outdoors)	Passive	Video
Door access & digital badges	Entry and/or exits via an access card, smart card or other digital badging technologies are recorded by the card access system(s). Records are not limited to pedestrian traffic and may include vehicular traffic when there is an exit/entry at a parking gate.	Passive	Text/Logs
Location services	Wireless end-user devices may be tracked while on the University campus wireless network as a result of network security and wireless network management operations. While metadata about Internet activity may be tracked, the exact nature and content of the activity is not.	Passive	Telematics

Location services	Location tracking occurs when the virtual walkhome feature is activated by the user from the University's campus safety mobile app.	Active	Telematics/ Location/GPS
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Telephones	Telephone conversations may be recorded, where the individual is part of a service unit, or engages in contact center operations, for quality control & customer service training. Telephone calls may be recorded for safety and security investigations or the normal discharge of university operations. An announcement alerting the parties of the recorded call will be played back before the recording starts.	Active	Audio
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University's _____, or as defined by the University storage and records management standards, or as is deemed necessary and proper in the discharge of the University's function.

While the University does not subscribe to a “right to erasure / right to be forgotten” policy at the time of the approval of this document, it is committed to granting such requests, within the scope of records, activities and events that were collected and recorded as part of the employer's electronic monitoring, for employees that change or cease their relationship with the University, where technical and operational controls permit it and where the request is based on reasonable grounds.

4.5 Data Retention

In order to comply with the _____ and other statutory requirements, all records, activities and events recorded using electronic monitoring within the scope of this policy, shall be kept for a minimum of one (1) calendar year from the date that the data was first captured.

Additional retention and data disposition schedules are applicable provided that it is in compliance with clause 4.6.1. Data may, in absence of a set disposition schedule, be kept in perpetuity as the employer sees fit to maintain proper University operations and functions or for quality control purposes.

5. Related policies

Laurentian University [Policy on Freedom of Information and Protection of Privacy](#)

Laurentian University [Policy on Access to Electronic General and Personal Information](#)

Laurentian University [Policy on Managing Confidential Digital Information](#)