



## Information Technology Services Policy 10.1

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**Subject:** COLLECTION AND USE OF ELECTRONIC MONITORING  
INFORMATION POLICY

**Scope:** ALL COUNTY COUNCIL, LIBRARY BOARD, EMPLOYEES OF THE  
COUNTY, STRATHMERE LODGE AND LIBRARY BOARD, AND  
VOLUNTEERS

**Issued:**

**Revised:**

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**Purpose:**

The Corporation of the County of Middlesex (the "County") values trust, discretion, and transparency. This policy is intended to advise employees on County practices relating to the collection and use of Electronic Monitoring data.

Electronic monitoring is an essential part of ensuring compliance with County policies, maintaining the security and integrity of County information technology infrastructure, and ensuring information technology services (ITS) assets are used safely and appropriately.

**Definitions:**

**Data Collection** refers to the automated or manual processing of employee data. This includes the collection, use, and storage of employee data such as computer activity data and other forms of personal information.

**Electronic Monitoring** refers to the practice of collecting user activity data on company-owned computers, networks, and other IT infrastructure. This data includes, but is not limited to, facility access card monitoring, electronic employee time tracking, video surveillance, web browsing history, files downloaded, data input, network traffic, logons to corporate systems, interactions with data, peripheral (printer, mouse, keyboard, external drive) device usage, and information about the employee's computer.

**Employee** refers to any Members of Council, Library Board, directors, officers, managers, employees, contract employees, volunteers, other representatives, and agents including consultants and independent contractors of the County of Middlesex.



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**Personal Information** refers to any data collected about an identifiable individual. This includes data that when combined with other information, could identify the individual.

**Policy:**

The County is committed to maintaining a transparent and fair workplace. Therefore, in this policy, the County identifies how Electronic Monitoring information is collected and used.

The County uses various electronic monitoring methods for data collection generated by its employees, contractors, and visitors as outlined in HR Policy 1.17 – Electronic Monitoring. Electronic Monitoring data may be used for auditing compliance, analytics, information technology infrastructure security and integrity, troubleshooting, and in certain circumstances, employee performance or disciplinary action.

**Procedure:**

Requests for access to any information gathered as part of HR Policy 1.17 – Electronic Monitoring shall be directed to the Director of Information Technology Services.

Any requests related to employee performance or disciplinary action shall be directed to the CAO and/or Director of Human Resources.

The Middlesex County ITS Department shall log any requests for information collected under this policy for future review. Logs shall include the requester's name, the nature of the request (with confidential information redacted), approvals obtained, the type of data obtained, and the date and time in which it was delivered to the requester. These logs will be maintained by the Middlesex County ITS Department.

Appropriate controls are in place regarding electronic monitoring data collected under this policy to ensure that it is only accessible by authorized individuals with appropriate approval.

Middlesex County ITS staff may, through the course of approved regular support activities, come across information regarding staff activities (both real-time and historical). In these circumstances, this data may only be used for the purposes of troubleshooting and supporting day-to-day activities of the organization.



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### **Privacy and Confidentiality**

Middlesex County's data collection is aimed at collecting electronic monitoring information related to its business. At times, some information collected by electronic monitoring may be considered personal information. When personal information is under County control, it is the responsibility of the county to protect it.

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. The County will adhere to all privacy and confidentiality legislation that applies to the collection, use, and disclosure of personal information obtained by electronic monitoring, including but not limited to the Employment Standards Act and the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).

### **Retention of Electronic Monitoring Records**

The retention of electronic monitoring records will be done in accordance with the timelines set out in By-law 5654, as amended, or replaced.