



SECTION: Health and Safety

POLICY: HS 13

DATE: June 2025

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Electronic Monitoring Policy

PREAMBLE:

Contact Brant is committed to abiding by all its obligations under Ontario's Employment Standards Act, 2000 (ESA), including those which apply to electronic monitoring. As such, Contact Brant is committed to informing its employees about the presence (if any) of electronic monitoring software or equipment either in the workplace or contained on any of the organization's servers or programs.

This policy is based on *Bill 88: Working for Workers Act, 2022*. As an organization with more than 25 employees, Contact Brant is required to have a policy regarding electronic monitoring in place. The policy applies to all employees, whether their primary work location is in the office, at home, on the road, or a combination of any or all of the above.

ESA Requirements

The ESA requires transparency about whether employees are electronically monitored.

The ESA requirements do not:

- Establish a right for employees not to be electronically monitored by their employer; or
- Create any new privacy rights for employees.
- Limit the use of information obtained through electronic monitoring.

Contact Brant's Electronic Monitoring Policy specifies:

- A description of how and in what circumstances, Contact Brant may electronically monitor employees,
- The purposes for which Contact Brant may use the information obtained through electronic monitoring, and
- The date the policy was prepared and the date any changes were made to the policy.

POLICY

Contact Brant uses video surveillance technology at both entrances to the building to ensure employee safety and security, and to deter theft and vandalism.

PROCEDURE

1. Electronic Monitoring Equipment in Place

Contact Brant uses video surveillance technology at both entrances to the building to ensure employee safety and deter theft and vandalism. This means that employees entering and exiting the building will be included in the surveillance footage.

The video surveillance equipment does not include audio. The equipment is clearly visible (one in the front lobby and one outside the back door) and is marked with signage.

2. Reasons for Accessing the Electronic Records for Monitoring Equipment

Contact Brant employees will access records from this equipment in the following circumstances:

- All employees working in the office have access to live streaming from the video surveillance to see who is entering the building or ringing the doorbell.
- In the event of a security alarm call after hours, alarm-responders will have access to the footage to see if anyone has entered the building.
- In the event of an investigation into a client complaint, or a complaint of harassment or violence, managers will have access to footage.
- Should illegal conduct be uncovered, video surveillance footage may be disclosed to the authorities and approved third parties.