
BC INFRASTRUCTURE BENEFITS

Workplace Monitoring Policy



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REVISION HISTORY

Date of revision	Reason (refer to blackline version to see revisions)
May 14, 2020	Initial Board Approval
July 15, 2021	Rename: Workplace Monitoring Policy Minor changes; insert 'other monitoring devices', clarifying content regarding Contractors; and other minor changes.
December 6, 2022	Minor edits regarding contact details and to align with recent regulation changes to FIPPA.

1. PURPOSE

BC Infrastructure Benefits Inc. (“BCIB”) is committed to protecting personal information of its employees and to compliance with the *Freedom of Information and Protection of Privacy Act* (“FIPPA”).

The purpose of this policy is to outline the practices that apply to video and other forms of monitoring on BCIB projects and at the corporate office.

2. APPLICATION

This policy applies to BCIB project sites and the corporate office.

3. INFORMATION COLLECTION

Video Monitoring

BCIB has video cameras in place at the corporate office and may have cameras in place at BCIB trailers at project sites. If used, cameras will be placed in a way to most effectively meet the purposes set out in this policy while being minimally invasive on employee and third-party privacy.

Contractors may also implement video monitoring or use monitoring devices at project sites for the purposes set out herein or for similar purposes. In some circumstances, BCIB and Contractors may work together to implement video or other monitoring as appropriate. BCIB may review and access video monitoring implemented by Contractors as required for the purposes set out in this policy or as otherwise authorized by law.

Due to the nature of BCIB projects, monitoring may be implemented on a 24-hour basis.

Purpose of Video Monitoring

BCIB and/or Contractors may use video cameras or other monitoring devices for the following, non-limited purposes:

- a. To protect safety and security of BCIB and Contractor employees, e.g.:
 - For the protection of employees who may be working alone;
 - For the safety of employees who are working in areas where members of the public pass-through traffic-controlled areas in vehicles; or
 - For the protection of employees performing safety sensitive work or working on safety sensitive project sites.
- b. To protect BCIB and/or Contractor assets and property;

- c. To record incidents and document inspections;
- d. To comply with contractual or statutory reporting obligations;
- e. To comply with BCIB's and/or Contractor health and safety obligations;
- f. To monitor wildlife hazards;
- g. Investigations, including, but not limited to, safety investigations;
- h. Productivity and efficiency; and
- i. Other purposes required or authorized by law.

4. USE AND DISCLOSURE

Information collected through video or other forms of monitoring is treated with a high degree of confidentiality and only used for the purposes identified in this Policy, except as required or authorized by law.

BCIB and/or Contractors may share information collected through video monitoring with each other in accordance with the terms of the contract between BCIB and the Contractor, and with service providers, public bodies and or regulators for the purposes set out in this policy, or as otherwise required or authorized by law.

In the event that BCIB and/or a Contractor becomes aware, through examination of information collected through video or other forms of monitoring that an individual has engaged in behaviour that is prohibited in the workplace, the individual may be subject to disciplinary action up to and including termination.

5. SAFEGUARDING OF EMPLOYEE PERSONAL INFORMATION

BCIB utilizes the highest security standards to ensure that the personal information that is in BCIB's custody and/or control is secured at all times. BCIB requires Contractors and other third-party service providers to implement adequate security controls to protect personal information.

Access to information collected from video cameras or other devices under BCIB's custody or control is limited to authorized BCIB employees, Contractors, and/or other third-party service providers who need to access the information for the purpose of performing their duties or responsibilities to BCIB or as otherwise required or authorized by the terms of the contract between BCIB and the Contractor or applicable law. BCIB requires Contractors to comply with applicable privacy law in respect of access to employee personal information where video cameras or other forms of monitoring are under their custody or control.

Employees are prohibited from engaging in video or audio recording for personal reasons at any BCIB workplace and/or for purposes that are not permitted by BCIB.

6. RETENTION

Information collected through video monitoring will only be retained until the purposes set out in this policy have been fulfilled, except as required or authorized by law or contract.

7. QUESTIONS REGARDING PRIVACY AND REQUESTS FOR ACCESS

Questions regarding privacy protection at BCIB and requests for access may be submitted to BCIB's Manager, Procurement and Compliance at:

Email: foi@bcib.ca
Telephone: (778) 783 - 1200
BC Infrastructure Benefits Inc.
Suite 1050 – 89 West Georgia Street
Vancouver, BC V6B 0N8

Access to an employee's personal information is subject to the application of Part 2 of the *Freedom of Information and Protection of Privacy Act* ("FIPPA").

8. REFERENCES AND RELATED POLICIES

- Employee Privacy Policy
- IT Security Policy

9. POLICY AMENDMENTS

BCIB reserves the right to amend this policy from time to time and will publish revisions at the earliest reasonable opportunity.