

Campus security release of information procedure

Parent Policy

300-3-2: Security Services Policy

Purpose

This procedure provides the administrative requirements for distributing information collected and administered by Campus Security to other College departments or external agencies.

Scope

This procedure applies to Campus Security. All Bow Valley College employees, learners, alumni and independent contractors are required to understand and abide by the limitations of this procedure.

Compliance

Members of the college community are expected to adhere to the policies, procedures, and standards established by the college. These policies are designed to foster a safe, respectful, and inclusive environment that supports learning, teaching, and professional integrity.

Non-compliance may create risk for the college and will be addressed accordingly through applicable college policies, procedures and contracts. This may result in disciplinary action, up to and including termination for employees and expulsion for students.

Procedures

1. All information banks administered or created by Campus Security are the sole property of Bow Valley College and shall be treated as protected information.
 - 1.1. These records include, but are not limited to:
 - 1.1.1. Guard notebooks;
 - 1.1.2. Dispatch records;
 - 1.1.3. Activity / incident reports;
 - 1.1.4. Shift briefs;
 - 1.1.5. Key Performance Indicator (KPI) reports;
 - 1.1.6. Work authorization forms;
 - 1.1.7. Independent contractor /visitor /afterhours sign in sheets;
 - 1.1.8. Access control system reports;
 - 1.1.9. Key management software reports; and
 - 1.1.10. Closed circuit television (CCTV) footage.
2. All requests to access an information bank, held by Campus Security, shall be directed to the Bow Valley College Manager, Security and Emergency Services or his/her designate.
3. The Manager, Security and Emergency Services or his/her designate must approve the

installation and use of all security related video surveillance equipment, as well as the disabling or disconnection of CCTV surveillance.

4. The Manager, Security and Emergency Services or his/her designate is responsible for the supervision of the use of security related CCTV surveillance equipment and records.
5. Monitoring of security related CCTV surveillance shall only be conducted by authorized members of Campus Security. The Manager, Security and Emergency Services or his/her designate must ensure that those members of Campus Security who are authorized to monitor the CCTV surveillance are aware of the privacy considerations and obligations owing to individuals pursuant to Provincial Legislation.
6. Security related CCTV surveillance shall not be used to monitor any specific person unless the individual is engaged in suspicious or criminal behavior that may threaten the safety and security of the Bow Valley College community or its buildings or assets.
7. Authority for Campus Security to release information shall only be granted by the following, or their designate;
 - 7.1. President and CEO;
 - 7.2. Vice President, responsible for security services;
 - 7.3. Director, responsible for security services;
 - 7.4. Manager, Security and Emergency Services
 - 7.5. The Security Site Supervisor (urgent law enforcement requests when Manager, Security and Emergency Services is unavailable.)
8. The release of information shall be in accordance with the Alberta FOIP Act, which states:

“Disclosure of personal information

40(1) A public body may disclose personal information only

(h) to an officer or employee of the public body or to a member of the Executive Council, if the information is necessary for the performance of the duties of the officer, employee or member.

(i) to an officer or employee of a public body or to a member of the Executive Council, if the disclosure is necessary for the delivery of a common or integrated program or service and for the performance of the duties of the officer or employee or member to whom the information is disclosed.”

Internal Access to Information Banks (as defined in Section 1)

9. Request for access to information banks for the purposes of an Employee Code of Conduct or an Occupational Health & Safety investigation, will require the pre-authorization of the Executive Team member responsible for People, Equity, Diversity & Inclusion or his/her designate.
10. Request for access to information banks for the purposes of a Learner Code of Conduct investigation will require the pre-authorization of the Director, Student Services or his/her designate.
11. All requests for access to the recorded CCTV surveillance images must be submitted in writing or emailed to the Manager, Security and Emergency Services or his/her designate. Disclosure will be approved only if the applicant has obtained the appropriate pre-authorization as outlined in section 9, 10 and 11.
12. Information obtained through the CCTV surveillance system will only be released or disclosed upon the authorization of the Manager, Security and Emergency services or his/her designate, and in accordance with the provisions of provincial freedom of information and protection of

privacy legislation.

13. Where possible the Manager, Security and Emergency Services or his/her designate will do their best to ensure that information pertaining to individuals not under investigation is omitted.
14. All requests for access control reports regarding Bow Valley College employees must be approved for release by the Vice President, People, Equity, Diversity & Inclusion or his/her designate.
15. All records created by the CCTV surveillance system will be viewed and stored in a restricted access area. The Manager, Security and Emergency Services or his/her designate will be present while the selected CCTV footage is viewed and will retain that footage.

Release of information to external agencies

16. Information shall only be released to Municipal, Provincial, or Federal agencies, in support of an active police investigation.
 - 16.1. The Manager, Security and Emergency Services or in his/her absence the Security Site Supervisor shall approve these requests, so long as there is no real or perceived conflict of interest between Bow Valley College and the external agency. Should there be a perceived conflict of interest, the external agency shall be denied access, pending direction from Bow Valley College, or court order. In this event, the Director of Campus Services shall be immediately notified.
 - 16.2. If information on learner records is being requested, then law enforcement should be directed to contact the Registrar. Note: The only exception to this is if there is an imminent/urgent safety concern, certain learner information may be provided to security. The Manager, Security and Emergency Services, and the Director, Campus services will be notified immediately if an imminent/urgent life safety concern is identified. The Registrar will be notified as soon as possible thereafter.
 - 16.3. If approved, the requesting agency must complete a Law Enforcement Disclosure Form.

Retention Period

17. If a CCTV surveillance record has been reviewed for law enforcement purposes or for the purposes in section 10 or 11 above, the record shall be retained with the Manager, Security and Emergency Services for:
 - 17.1. one year from the date of viewing; or
 - 17.2. one year from the date of final resolution of the incident.

Definitions

Campus Security:

An external contracted security company awarded a limited term contract with Bow Valley College. Campus Security is assigned to make Bow Valley College a safe and secure environment to live, learn and work.

Closed circuit television (CCTV) footage:

A television system in which signals are not publicly distributed but are monitored and recorded, primarily for surveillance and security related purposes.

Key Performance Indicators (KPI):

Key performance indicators are quantifiable measurements that are considered to be critical to the success of BVC.

Records/Reports:

An electronic detailed account or statement

Security Manager:

Bow Valley College, Security and Emergency Services Manager

Security Site Supervisor:

The senior on-site Supervisor of contracted security company assigned to the College.

Data sheet

Responsible Officer

Director, Campus Services

Relevant Dates

Approved	Executive Team: EXT20200211-1
Effective	February 11, 2020
Next Review	February 2025
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Verified by	Office of the President, May 2024

Related Policy

Security Services Policy #300-3-2

Associated Policies, Procedures, and Guidelines

On Campus Cash Transfer Procedure #300-3-2-A

Lost and Found Procedure #300-3-2-B

Patrol Routine Procedure #300-3-2-C

Security Removal of Individuals from College Premises Procedure #300-3-2-E

Security Incident Reporting Procedure #300-3-2-F

Campus Security Safe Escort Procedure #300-3-2-G

Related Legislation

Access to Information Act (Canada)

Freedom of Information and Protection of Privacy Act (Alberta)

Personal Information Protection Act (Alberta)

Personal Information Protection and Electronic Documents Act

(Canada) Public Interest Disclosure Act (Alberta)