

Part A:

Code of Conduct – SAIT employees licensed under *Security Services and Investigators Act, SA 2008, c.S-4.7*

A. Conduct requirements for all SAIT employees

1. Employees must conduct themselves in accordance with federal, provincial and municipal legislation, with SAIT's FIRST Principles (Fairness, Integrity, Respect, Safety and Transparency), and with SAIT's policies and procedures. All employees are responsible for making themselves aware of and complying with SAIT's policies and procedures¹.
2. Employees are required to maintain a high standard of integrity in all their business relationships, such that their honesty, impartiality and propriety are clearly evident and cannot reasonably be questioned².
3. Employees are required to respect and maintain the confidentiality, integrity and security of the personal information they access or use in the course of their employment at SAIT, and to access and/or use SAIT's records and information only for the intended purposes of those records and information³.
4. Employees who breach SAIT's procedures and SAIT's conduct expectations will be subject to corrective action by SAIT, which may result in corrective measures including written warnings, suspension, demotion, and/or dismissal. Examples of unacceptable employee conduct subject to corrective action include but are not limited to⁴:
 - deliberate disregard for SAIT's policies and procedures
 - dishonesty
 - discrimination
 - disregard for safety regulations
 - falsification of records or documents
 - harassment
 - impairment due to the use or consumption of alcohol or illicit drugs (i.e. a substance, excluding a medication, that has legal restrictions or prohibitions on its use, sale, possession, purchase or transfer)
 - insubordination
 - sexual harassment, sexual violence and/or gender-based violence
 - smoking and/or the unauthorized use of tobacco products (including cannabis)

¹ SAIT procedure HR.4.11.1 Conflict of Interest, Governing Principle 2; SAIT procedure AD.1.3.1 SAIT Procedures, Governing Principle 3.

² SAIT procedure HR.4.11.1 Conflict of Interest, paragraph D.1.

³ SAIT procedure HR.4.11.1 Conflict of Interest, paragraphs E.1 and E.2. See also SAIT policy AD1.1 Privacy and its accompanying five procedures.

⁴ SAIT procedure HR.4.4.1 Corrective Action procedure, paragraph 4. See also SAIT procedure HR.4.10.1 Respectful Workplace and Learning Environment; SAIT procedure HS.1.2.1 Prevention of Violence; SAIT procedure HS.1.6.1 Sexual Assault, Sexual Violence and Gender-Based Violence – Principles and Support.

- theft
- unethical conduct
- violence

B. Additional requirements for employees licensed under the Safety Security Services and Investigators Act

1. SAIT employees licensed under this legislation must comply with the policies of the Security Services and Investigators Program. In particular, they are required to:
 - a) Comply with and respect/use all property and equipment in accordance with the terms and conditions of SAIT's licence and SAIT's procedures.
 - b) Report all adverse information, complaints and reports about any other licensee governed by the Security Services and Investigator's Program.
2. Breaches of these additional requirements by SAIT employees licensed under this legislation will be reported to the Security Services and Investigators Program, and may result in suspension/cancellation of SAIT's licence.

Part B:

Policy for Public Complaints against Licensed Employees

As per sections 24, 25, 26 and 27 of the *Security Services and Investigators Act* ("the Act"), if a public complaint is received about a SAIT employee licensed under the Act, the following process will be followed. This policy only applies to individuals directly employed by SAIT and does not apply to the licensed employees of contract service providers.

For the purposes of this section, Registrar refers to the Registrar, *Security Services and Investigators Act*, Alberta Justice and Solicitor General. Contact the Complaints Coordinator at poprogram@gov.ab.ca for assistance and to ensure that all required documentation is submitted to Security Programs regarding the below situations.

1.0 PUBLIC COMPLAINTS REQUIRING INVESTIGATION

- 1.1** Complaints against individual licensees ("the employee") employed by SAIT must be made in writing to the employee's manager, within 90 days of the action or circumstances that prompted the complaint.

If a complainant is unable to provide a written document due to a valid reason such as language barrier or disability, the manager shall take the necessary steps to have the complaint recorded in writing on behalf of the complainant. The complainant must sign the written complaint.

The employee's manager will forward the complaint to the Office of General Counsel, which will work in collaboration with the manager to ensure that SAIT meets its obligations under the Act and under this policy.

- 1.2** Within 30 days of receiving the complaint, SAIT must acknowledge receipt of the complaint, in writing, to the complainant (as per section 26 of the *Security Services and Investigators Ministerial Regulation*).

- 1.3** In acknowledging the complaint, SAIT must notify the employee who is subject of the complaint.

SAIT may delay notification to the employee under the following circumstances. In the case where it is uncertain as to the appropriateness of informing a licensee about a complaint, the Registrar should be consulted.

- The complainant may be placed in danger.
- The complainant may face other inappropriate action by the employee should the licensed employee be informed.
- The notification may impede the gathering of evidence during an internal investigation.

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- A reasonable likelihood exists that the complaint may lead to charges under federal or provincial legislation and that notification could impede any resulting police or other investigative agency investigation.
- Any other situation identified by SAIT or the Registrar in which it may be appropriate to delay informing the employee about the complaint.

1.4 SAIT must, within 90 days,

- Investigate and dispose of the complaint (unless section 3.0 below applies), and
- Notify the complainant, the employee who is the subject of the complaint, and the Registrar (use Incident Report Form PS3750), in writing, of the disposition of each individual allegation noted within the complaint, with reasons. See section 28 of the *Ministerial Regulation* for the required disposition wording options. Each allegation may have a different disposition finding.

1.4.1 The letter of disposition must advise the complainant of their right to request a review of the outcome by the Registrar. The letter must indicate the following:

- If dissatisfied with the outcome of the company's investigation, the complainant may request a review of the disposition by the Registrar.
- The request must be made in writing within 30 days of receipt of the disposition.
- Requests for review must be submitted to:
Complaints Coordinator, Security Programs Justice and Solicitor General
9th floor, 10365-97 Street
Edmonton, Alberta
Email: poprogram@gov.ab.ca

2.0 CRIMINAL MATTERS

SAIT must report any allegations of criminal misconduct to the Calgary Police Service for investigation. Complaints that contain allegations of excessive force are considered criminal allegations.

2.1 In allegations of criminal misconduct, SAIT may consider the obligation to reach a conclusion within 90 days, as per section 25(4) of the Act, fulfilled if SAIT has:

- Notified the Calgary Police Service of the allegation, and
- Provided written notification to the complainant, and
- Provided written notification to the Registrar that these actions have occurred.

- 2.2** A concurrent internal investigation may proceed provided that SAIT interacts/cooperates with the Calgary Police Service and take such steps that are necessary to avoid contaminating the criminal investigation. If a concurrent investigation is conducted, it must be completed within 90 days as per section 25(4) of the Act and the outcome report as per section 1.0 of this policy.

3.0 COMPLAINTS NOT REQUIRING INVESTIGATION

In some situations, a complaint may be made that does not require investigation.

- 3.1** Under one or more of the following conditions, SAIT may choose not to investigate a complaint:

- SAIT utilizes an informal resolution process (see section 3.4 below).
- The employee no longer works for SAIT.
- SAIT cannot make contact with the complainant after their submission of the initial complaint (documentation showing this is the case should be kept in case of request for review by the Registrar).
- Anonymous complaint.
- Frivolous complaint: a complaint intended merely to harass or embarrass.
- Vexatious complaint: a complaint that has no basis in fact or reason, with its purpose to bother, annoy, and embarrass the employee or SAIT.
- Bad faith complaint: filing a complaint with intentional dishonesty or with intent to mislead.
- Having regard of all the circumstances, no investigation, in the option of SAIT or the Registrar, is deemed necessary.

- 3.2** Notification that investigation will not proceed

SAIT must notify the complainant within 90 days of receipt of the complaint that the matter will not be investigated, except in situations where an informal resolution process is undertaken, the complainant cannot be contacted or the complaint is anonymous.

- 3.2.1** The letter must advise the complainant of their right to request a review of the outcome by the Registrar. The letter must indicate the following:

- If dissatisfied with the outcome of SAIT's investigation, the complainant may request a review of the disposition by the Registrar.

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- The request must be made in writing within 30 days of receipt of the disposition.
- Requests for review must be submitted to:
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3.3 Anonymous complaints

Anonymous complaints do not allow either SAIT or the Registrar to discharge their required legal responsibilities and therefore are not considered a complaint under the Act.

If the nature of an anonymous complaint is serious, SAIT shall review the matter and consider what, if any, further action should or can be taken. If some element of substance to the allegation is uncovered, SAIT must:

3.3.1 Within 90 days,

- Investigate and dispose of the complaint, and
- Notify the Registrar in writing (use Incident Report Form PS3750), of the disposition of the complaint with reasons.

3.4 Informal resolutions of formal written complaint

Successful informal resolution allows an investigation to be discontinued. If, in SAIT's opinion and having regard to all of the circumstances, no investigation is necessary, SAIT may discontinue the investigation.

- a) The employee's manager shall, within 90 days of receiving the complaint, discuss the situation with the employee and determine the reasons for the complaint, identify and implement ways to correct the situation, and identify ways to prevent a similar situation from occurring in the future.
- b) The employee's manager shall document the outcome of these discussions and, where possible, obtain the complainant's signature to show that the matter has been informally resolved, so that the complainant is unable to claim duress or to claim that they did not agree with the outcome. Without such clear documentation, informally resolved complaints may, in some circumstances, be eligible for review by the Registrar and, subsequently the Director of Law Enforcement, Province of Alberta.
- c) The employee's manager shall notify the Registrar (use Incident Report Form PS3750), in writing, of the informal resolution with details, and provide a copy of the original written complaint.