Implementing Board Policy <u>3.40.01</u> Contact: Chief Administration Officer, 434-5037

1.0 Purpose

For the purposes of health and safety, to provide the procedure for regulating, at a minimum, the writing, approval, filing, dissemination and retention of security reports involving student information.

2.0 Limitations and Requirements

- 2.1 Release of student records is limited by the Family Educational Rights & Privacy Act of 1974 (FERPA), and WAC 132Q-02-350 Confidentiality of student records. Security reports containing education records must comply with FERPA regulations.
- 2.2 Incidents involving criminal conduct must be reported to the appropriate law enforcement agencies.
- 2.3 In cases where records are made available without student release as permitted for health and safety reasons, the CCS institution shall maintain a record kept with the education record released which will indicate the parties which have requested or obtained access to a student's records maintained by the college and which will indicate the legitimate interest of the investigating party (WAC 132Q-02-380(3)). As campus safety officers are recognized as school officials, releases in accordance with WAC 132Q-02-380(1) (a) need not be recorded.
- 2.4 Release of personally-identifiable records: Information from education records may be released to appropriate persons in connection with an emergency if the knowledge of such information is necessary to protect the health and safety of a student or other person(s) (WAC 132Q-02-380(7)). If the CCS institution determines that there is an articulable and significant threat to the health or safety of a student or other individuals, it may disclose information from education records to any person whose knowledge of the information is necessary to protect the health and safety of the student or other individual(s). CCS recognizes health care professionals (doctors, psychological counselors) and campus safety officers can be designated as school officials (FERPA updated December, 2008).

3.0 Security Incident Reporting

- 3.1 Observed incidents that are or have a reasonable possibility of becoming issues involving the safety and security of students, CCS employees, or other individuals, are recorded in a computerized tracking system. Campus security personnel at each institution have access to the information and when appropriate this information may be shared with the Spokane Police Department or other appropriate law enforcement agencies.
- 3.2 Security incident reports may first be reported on a Security Incident Report (SIR) form by CCS employees. As soon as practical, campus security officers will document incidents, investigation and findings.
 - 3.2.1 The report must include all information necessary for the purposes of safety and security in the given situation. The report must not include any personally-identifiable student information that is not relevant to the security issue of the incident.

3.2.2 Data will be analyzed frequently to identify trends and inform SCC and SFCC security and administrators of any needed changes in security planning.

4.0 Student Conduct Incident Report

Student Conduct Incident Report (SCIR) forms are used to record incidents that may or may not be related to safety and security issues. These forms may be completed by faculty members or other CCS employees regarding student conduct that is disruptive to the educational environment in some way and may or may not require disciplinary action. Release of a SCIR is protected under the limitations afforded by FERPA and the appropriate WACs (See section 2.0, Limitations and Requirements, above). To obtain a SCIR form, see paragraph 7.6, below.

- 4.1 All SCIRs will be routed to the appropriate administrator at each institution: SCC Associate Dean of Student Services and SFCC Associate Dean of Student Life.
- 4.2 If the SCIR has the box checked that the incident is a security issue, or if after reviewing the SCIR, the appropriate administrator identified in 4.1, above, deems that it may be a security issue, the appropriate security officer is immediately notified and shown the SCIR. The security officer inputs only the security relevant information into SIRTS.
- 4.3 The appropriate administrators identified to 4.1, above, retain the SCIR forms.

5.0 Retention of Security Records

Records of the campus security department which are kept apart from academic records and which are maintained solely for law enforcement purposes and which are not made available to persons other than law enforcement officials of the same jurisdiction are not considered "education records" (WAC 132Q-02-360). As such, students do not possess the right to inspect such records as is the case with education records; however, such records may be subject to disclosure through the Washington State Public Records Act (Chapter 42.56 RCW).

- 5.1 Security records shall be kept separate and apart from academic records. Special precautions shall be exercised to ensure that information from disciplinary, security, or counseling files is not revealed to unauthorized persons.
- 5.2 Provision shall be made for periodic review and routine destruction of inactive disciplinary records by the offices maintaining such records (WAC 132Q-02-360). As security records kept by campus security personnel are not education records, such records will be retained and destroyed as prescribed in the Washington State General Retention Schedule.

6.0 Campus Contacts

- 6.1 Spokane Community College
 - > Office of the Associate Dean of Student Services for Student Development, Bldg. 6
 - > Office of the Vice President for Student and Instructional Services, Bldg. 50

6.2 Spokane Falls Community College

- Office of the Associate Dean for Student Life, Bldg. 17, Rm 126
- > Office of the Vice President of Student Services, Bldg. 17, Rm 150A
- Security, Bldg. 17

7.0 Related Information

- 7.1 Chapter 132Q-02 WAC, Student records
- 7.2 Public Law 93-380, the Family Educational Rights and Privacy Act (FERPA) of 1974
- 7.3 Chapter 42.56 RCW, Public Records Act
- 7.4 General Retention Schedule for Washington's Community & Technical Colleges
- 7.5 Security Incident Report, <u>CCS 1286</u>

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