

# Identification and Access

## Purpose

Outlines requirements associated with identification and access control to ensure the physical security of BCLC corporate facilities.

## Scope

This policy applies to all BCLC employees and contractors and provides direction on identification and access as it relates to BCLC corporate facilities. The policy also outlines identification requirements for employees and contractors while on site at any British Columbia gaming facility for the purpose of employment duties.

## Policy Statement

BCLC is committed to maintaining the integrity of corporate assets and the security of all individuals at a corporate facility. As such, BCLC requires every individual to wear a BCLC employee, contractor or visitor identification card, at all times and in a clearly visible manner. In accordance with the *Gaming Control Regulation*, British Columbia, BCLC employees and contractors are also required to display their identification cards in the same manner while on site at any British Columbia gaming facility during the course of their employment duties.

To ensure a high level of protection, access to BCLC corporate facilities is electronically controlled. Each employee or contractor is required to use an individually issued access card and if required, an associated biometric scanner, to access any controlled entrance. Within BCLC's corporate facilities, employees and contractors are issued access limited to specific areas of the building during a specified timeframe, in accordance with their position and duties. Employees who access BCLC corporate facilities outside of regular business hours must comply with requirements for after-hours access outlined in the policy details below. Employees must not attempt to gain or provide others with unauthorized access to any controlled area in a BCLC corporate facility.

To maintain the highest level of physical security and operational integrity, the Corporate Security and Asset Protection department is responsible for the control, issuance and records maintenance of all electronic access cards and corporate facility keys (excluding the keys for desks, cabinets and fleet vehicles).

It is the responsibility of the senior specialist, corporate security, to evaluate the identification and access systems in place for operational effectiveness on an ongoing basis and, where appropriate, initiate changes to the existing systems and procedures for all corporate offices.

## Context

Section 26(c) of FIPPA provides authority for Personal Information to be collected by BCLC for the purpose of visitor access to BCLC corporate facilities.

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## Policy Details

### EMPLOYEE AND CONTRACTOR IDENTIFICATION

Each BCLC employee and contractor is issued a corporate identification card based on their employment relationship with BCLC. Identification cards must be retained, at all times, in the care and control of the employee or contractor, unless otherwise specified. All employee and contractor identification cards have a GPEB registration number and associated expiry date printed on the card. This expiry date is considered the end of the validity period for the identification card. Upon expiry, the identification card must be returned to Corporate Security and Asset Protection to be re-issued upon the confirmation of a GPEB registration renewal.

All identification cards remain the property of BCLC and must be returned upon termination of employment or at the request of the employee's manager or Corporate Security and Asset Protection. Upon the termination of an employee, it is the responsibility of the employee's manager to collect and return the identification card to Corporate Security and Asset Protection as soon as reasonably possible.

If an identification card is misplaced or stolen, the employee or contractor is required to report this to Corporate Security and Asset Protection in accordance with BCLC's [Corporate Security Incident Reporting Procedure](#). A charge may be levied for lost or damaged cards against the responsible employee's associated cost center.

### ACCESS TO CORPORATE FACILITIES

All electronic access card requests (issuance and changes) must be approved by the employee's manager and are provided at the discretion of Corporate Security and Asset Protection. Access to operational areas that are designated with increased security requirements are provided at the discretion of the area manager, in addition to the approval of the employee's manager\*.

Access to facility keys is at the discretion of the senior specialist, corporate security, or designate. The senior specialist, corporate security, is responsible for tracking and documenting the use of facility keys. Facility keys will be issued for immediate use to perform the employee's duties. Following the completion of those duties, the facility keys must be returned immediately. Issuance of facility keys is restricted to the employees of the respective operational area or to employees with duties that require the use of the facility keys.

\* Exemptions may apply for emergency response programs

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## IDENTIFICATION AND ACCESS CARD SECURITY REQUIREMENTS

As outlined within this policy and the [Standards of Ethical Business Conduct for Employees and Contractors](#), employees and contractors must keep and store their identification and access cards safely and securely, at all times, and must adhere to the following security requirements:

- employees and contractors must not lend or share their identification and/or access card with any other person;
- identification and/or access cards must be used for work-related purposes only and are not official government identification;
- identification and/or access cards must not be copied, duplicated or manipulated in any way; and
- identification cards must not be posted to social media or a similar broadcast tool/platform.

## AFTER HOURS ACCESS

Employees who access the Kamloops or Vancouver corporate office outside business hours (M-F 0500-1900 hrs) must check-in with the Kamloops security desk upon arrival, in person or by phone, to confirm and verify BCLC identification, work location and expected duration in the corporate facility (this includes employees who have access to the corporate facility 24/7). Employees must contact the Kamloops security desk again when leaving the corporate facility. BCLC's [Corporate Security intranet page](#) provides further information on how to contact the Kamloops security desk.

Managers may also be required to create check-in procedures for an employee who is Working Alone or in Isolation in accordance with the *Occupational Health and Safety Regulation*, British Columbia.

## VISITOR ACCESS

All visitors must be sponsored in order to access a BCLC corporate facility. Only BCLC Executives, directors, managers, or persons designated by them, may sponsor a visitor.

It is the sponsor's responsibility to ensure the visitor has reported to the facility's public entrance, front desk upon their arrival. Front desk personnel are authorized under the FIPPA to request the visitor's valid, government-issued, picture identification. Front desk personnel are responsible to request and verify the visitor's identification, issue each visitor a BCLC visitor identification card and maintain an access log that records all visitor access to BCLC corporate facilities. A visitor may be permitted access without providing identification at the discretion of the senior specialist, corporate security, or designate.

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It is the responsibility of the sponsor to ensure the visitor wears the visitor identification card at all times and in a visible manner while in the BCLC facility. The sponsor also assumes responsibility for all actions of the visitor and must escort the visitor, at all times, while inside a corporate facility, up to and including returning to the facility's public entrance and front desk area. It is the responsibility of the sponsor to collect and return the visitor identification card back to the issuing location.

All visitors provided access to a BCLC facility with no business purpose must be approved by Corporate Security and Asset Protection, with or without condition. It is the responsibility of the sponsoring employee to obtain this approval prior to the commencement of the visit. The director of Enterprise Security and Compliance may refuse visitors at any time.

### Compliance

Exemption from policy requirements may be made on a case-by-case basis with written approval of the director of Enterprise Security and Compliance.

### Definitions

Defined (capitalized) terms and acronyms used but not defined within this policy have the meaning attributed to them within the [Policy Glossary](#).

<b>Working Alone or in Isolation</b>	Has the meaning attributed to it within the Occupational Health and Safety Regulation, being , as at the date of this policy, to work in circumstances where assistance would not be readily available to the employee in case of an emergency, or in case the employee is injured or in ill health.
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### Policy Ownership

<b>Contact Position</b>	Senior Specialist, Corporate Security
<b>Policy Owner</b>	Director, Enterprise Security and Compliance
<b>Approving Body</b>	Vice President, Legal, Compliance, Security

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## Revision History

Version	Effective	Approved by	Amendment
3.0	Jul 28, 2023	Vice President, Legal, Compliance, Security	Updates to add requirements for after hours access and security requirements for ID and access cards. Other housekeeping changes made throughout.
2.3	Oct 27, 2020	Vice President, Legal, Compliance, Security	Updates to authority titles to reflect changes following the organizational restructure for OneBCLC.
2.2	Jun 26, 2019	Vice President, Legal, Compliance, Security	Removed reference to Progressive Discipline Policy.
2.1	Jun 12, 2017	Vice President, Corporate Security and Compliance	Amendment to <i>Access to Corporate Facilities</i> to include exemption for emergency response programs.
2.0	Jul 18, 2016	Vice President, Corporate Security and Compliance	Amendment made to the responsibilities of BCLC's front desk personnel for maintaining an access log for all visitor access to a BCLC corporate facility. New compliance section has been added and position titles were updated.
1.0	Jul 24, 2015	Vice President, Corporate Security and Compliance	New policy replacing multiple policy documents related to identification and access to corporate facilities. The policy documents being replaced are 3.6 Key Control, Physical Security Policy, 3.1 Identification and 3.2 Access to Corporate Facilities.