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1.0 PURPOSE

As a registered person with the Control Goods Directorate (CGD) a security plan must be developed and implemented to protect goods, as well as the development, implementation and maintenance of a record keeping mechanism at the University of Windsor. The purpose of this plan is to outline the University of Windsor's Security Plan to ensure that adequate security measures are implemented in the protection of controlled goods and/or technology.

2.0 SCOPE

This procedure applies to goods listed in the schedule to the Defence Production Act (DPA), are those military, strategic and military-related goods and technology, as well as dual-use goods and technology as identified in Group 2 (most items), item 5504 and Group 6 (all items) of the Export Control List (ECL) made under the authority of the Export and Import Permits Act (EIPA), administered by Foreign Affairs and International Trade Canada. Items such as military vehicles, certain firearms and related ammunition, military aircraft, military electronics, missiles, satellites and most related components are generally considered to be controlled goods and/or controlled technology.

This plan is in effect over the period of registration under the Controlled Goods Directorate (CGD).

3.0 EXECPTIONS TO THE SECURITY PLAN

None

4.0 CROSS-REFERENCES

Controlled Goods Regulations, SOR/2001-32

Defence Production Act, R.S.C. 1985. c/ D-1. Section 40

Export and Import Permits Act

CGP-2010-1; University of Windsor – Controlled Goods and Technology Plan

CGP-2010-B; University of Windsor – Controlled Goods and Technology – Registered Personnel Security Assessment Procedure

5.0 DEFINITIONS

Director – Means a member of the University of Windsor's Board of Governors as outlined in the University of Windsor Act (1962)

Designated Controlled Access Area – Means the location that has had a security risk management assessment completed and approved by the designated official for the storage or use of a controlled good.

Designated Official – Individual appointed by the University of Windsor to carry out certain duties, as specified within the University of Windsor Controlled Goods and Technology Policy (CGP-2010-1)

Employee – Means an individual who through their course of their employment with the University of Windsor requires access to controlled goods and/or controlled technology.

Examination – Means to consider in detail or subject to an analysis in order to discover essential features or meaning.

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Officer – Officer of the University are those persons excluded from the bargaining unit as managerial by the certificate issued by the Ontario labour Relation Board who are authorized to act on behalf of the employer.

Possession – Means either actual possession, where the person has direct physical control over a controlled good at a given time, or constructive possession, where the person has the power and the intention at a given time to exercise control over a controlled good, either directly or through another person or persons.

Transfer - Means, with respect to a controlled good, to dispose of it or disclose its content in any manner.

Note: Officers, directors, employees, and temporary workers need to be reminded of the importance not to discuss controlled goods matters with employees or other individuals who have not been the subject of a security assessment, as the discussion is considered a transfer of information.

Remote access - Refers to communication with a data processing facility or server from a remote location through a data link. There is no remote access.

6.0 RESPONSIBILITIES

SECURITY ORGANIZATION

The following people, on behalf of the registered person, (University of Windsor) will be responsible for the security of controlled goods/technology at the institution.

Dr. Alan Wildeman is the Authorized Individual.

Ms. Sherri Lynne Menard is the Designated Official.

Site Address: 640 Patricia Avenue – B34 Essex Hall

Responsibilities of the Security Organization

The responsibilities of the individuals stipulated below are as follows:

- **The Authorized Individual**, on behalf of the registered person, will be responsible for the following:
 - Ensuring that a Designated Official is appointed for each place of business in Canada where controlled goods and/or controlled technology are kept; and
 - Approving by his/her signature any changes in any of the information contained in the application for registration.
- **The Designated Official**, on behalf of the registered person, will be responsible for the following:
 - conducting, with the consent of the individual concerned, a security assessment in accordance with section 15 of the CGR with respect to each officer, director and employee of the registered person who requires in the course of his/her duties access to controlled goods/technology,
 - to determine, the extent to which the individual concerned poses a risk of transferring controlled goods/technology to any person who is not registered, exempt or excluded from registration by making an evaluation as to the honesty, reliability and trustworthiness of the individual concerned;
 - to authorize the extent to which the individual concerned may examine, possess and/or transfer controlled goods/technology; and
 - must maintain records of the security assessment during the period of employment and for a period of two years after the day on which the individual concerned ceases to be an officer, director or employee of the registered person; and

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- submitting applications for exemptions to the Controlled Goods Directorate with respect to temporary workers and visitors.
- Mr./Ms. (*insert name of employee*) will be responsible, on behalf of the registered person, to keep and maintain, during the period of registration and for a period of five years after the day on which the person ceases to be registered, records that contain:
 - a description of any controlled goods/technology received by the person, the date of their receipt and an identification of the person from whom they were transferred;
 - a description of any controlled goods/technology transferred by the person, the date of their transfer and the identity and address of the person to whom they were transferred; and
 - a description of the manner and date of disposition of the controlled goods/technology.
- The designated official will be responsible, on behalf of the registered person, to keep a copy of the evidence referred to in subsection 16(2) of the *CGR* for a period of two years after the day on which the individual who is exempt ceases to have access to the controlled goods/technology of the registered person:
 - evidence of the individual's status as a director, an officer or an employee of the person registered to access controlled goods/technology under the *International Traffic in Arms Regulations*, Title 22, Parts 120-130 of the *Code of Federal Regulations* (United States) (Confirmation that the individual is employed by that person);
 - evidence of the registration and eligibility of that person under the International Traffic in Arms Regulations; and
 - evidence of the eligibility of the individual under the International Traffic in Arms Regulations.
- The designated official will be responsible, on behalf of the registered person, to establish and implement a security plan with respect to each place of business in Canada where controlled goods/technology are kept;
- The designated official will be responsible, on behalf of the registered person, to provide training programs to officers, directors, employees and temporary workers who are authorized to examine, possess and/or transfer controlled goods, with respect to the secure handling and safeguarding of controlled goods/technology;
- The designated official will be responsible, on behalf of the registered person, to provide security briefings to authorized visitors with respect to the secure handling and safeguarding of controlled goods/technology;
- The designated official will be responsible, on behalf of the registered person, to inform the Controlled Goods Directorate of any change of information contained in the application for registration; and
- The designated official will be responsible, on behalf of the registered person, to (list any additional responsibilities you deem necessary).

7.0 PROCEDURES

7.1 Procedures to Monitor Controlled Goods

7.1.1 Examination & Possession

While on site at the University of Windsor controlled goods and/or controlled technology are used and/or stored in designated controlled access areas. Controlled access areas are to have doors equipped with proximity cards which;

- Restrict access only to registered individuals.
- Records the identity and time of access of individuals entering the area.
- Facilitates real time monitoring by Campus Community Police through cameras.

Registered personnel maintain the security of the equipment while it is in the field. Deployment of controlled goods and/or controlled technology for field research requires a security plan, including a risk management assessment, which is prepared in consultation with the designated official. The registered individual, who has

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been assigned responsibility for the controlled goods and /or controlled technology while in the field, prepares a security plan specific to the field mission and obtains final authorization from the institutions designated official.

Repairs to controlled goods and/or controlled technology will only be carried out by registered individuals or the original equipment manufacturer.

All items are to be purchased in accordance with the University of Windsor's Controlled Goods and Technology Purchasing Policy.(CGP-2010-E)

7.1.2 Transfer

Registered individual shall not discuss controlled goods and/or controlled technology matter with employees or other individual who have not been the subject of a security assessment (CGP-2010-B) as the discussion is considered a transfer of information.

All purchasing, shipping and receiving of the controlled goods and/or technology is to be conducted by the Chemical Control Centre under the approval of the designated official prior to arranging the purchase or transportation of the goods.

All shipments must involve a bonded courier. Delivery to be documented, and must include, proof-of-delivery demonstrating receipt signature of an identified registered individual.

The controlled goods and/or technology are to be shipped in secure, sealed containers.

Registered individuals or the original equipment manufacturer will only carry out repairs of the controlled goods and /or controlled technology.

Planned disposal of controlled goods and/or technology shall require written approval from institutions designated official. Disposal is to be documented and retained by the designated official.

All transfers will be documented and retained by the designated official.

7.2 Reporting and Investigating Security Breaches

The University of Windsor will advise the Controlled Good Directorate, without delay, of any security breach in relation to controlled goods and/or controlled technology.

Security breaches can be categorized as follows: loss, unauthorized examination/possession/transfer, willful damage, and tampering of controlled goods and/or controlled technology. The following list is provided as examples of security breaches:

- Loss of controlled good – (known theft or disappearance)
- Unauthorized access to a controlled good.
- Appearance of willful damage to a controlled good
- Appearance of willful tampering of a controlled good.
- Witnessing of unauthorized persons examining controlled goods and/or controlled technology.
- Transfer of a controlled good (including information format) to an unauthorized person.

Security breaches are to be properly investigated by the University of Windsor's Campus Community Police in close collaboration and consultation with the institutions designated official. Corrective action will be taken to address any identified deficiencies and prevent any recurrence.

Any breach of a criminal nature that can be subject to conviction under the Criminal Code (such as theft), will be reported immediately to the appropriate criminal police body or agency, by Campus Community Police and in turn the designated official will notify, without delay, the CGD.

As a condition of registration under the *Controlled Goods Regulations* designated official must advise the CGD of a security breach via:

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Telephone: 613-948-4176 or 1-866-368-4646 (toll free)

Facsimile: 613-948-1722

E-mail: dmc-cgd@tpsgc-pwgsc.gc.ca

Mailing Address

Controlled Goods Program
Public Works and Government Services Canada
2745 Iris Street, 3rd Floor
Ottawa ON K1A 0S5

Courier Address

Controlled Goods Program
2745 Iris Street, 3rd Floor
c/o PWGSC Central Mail Room
Place du Portage, Phase III, 0B3
11 Laurier Street
Gatineau QC K1A 0S5

7.3 Training Program

In order to maintain the person's awareness of controlled goods and/or controlled technology, the officers, directors, employees and temporary workers will have to undergo the following training:

- read the security plan on an annual basis;
- read the CGP Newsletters; and
- complete the University of Windsor's Controlled Goods and Technology Training Procedure (CGP-2010-C)

7.4 Security Briefings

Visitors who have not been exempted from registration by the CGD will be informed that they are unauthorized to examine, possess, or transfer controlled goods/technology in the course of their visit.

Visitors who have been exempted from registration by CGD will be reminded of the proper handling and safeguarding procedures in regards to controlled goods/technology.

All security briefings are to be documented and retained by the designated official.

7.5 Review Process

This plan will be reviewed every (5) years with the following exceptions:

1. Changes in legislation occur that directly affects this procedure
2. A specific incident triggers a review of this procedure.
3. A request is made by individual responsible, senior administration or the board of governors to review this procedure.

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7.6 Process for Communication

Electronic: This procedure will be stored in a secure electronic format on the Chemical Control Centre Shared document library within two weeks of the approval of this procedure.

Print: A memo will be sent to all departments and/or individuals that are directly affected by this procedure.

Date (yyyy/mm/dd)	Revision
2014/04/09	New format and logo change, update designated official, change examination definition to reflect Controlled Goods Directorate (CGD), added note regarding information technology-remote access to reflect the addition in the CGD.