.2401 PURPOSE

The purpose of this policy is to promote public safety through the safe and secure operation of facilities in the Division of Prisons by ensuring that all facilities adopt regulations for the control of keys and locks. These regulations will enable correctional staff to maintain effective security through control of all doors, gates, grills and other locking devices that comprise physical plant security both inside and outside of the perimeter. This policy will ensure that correctional staff will have total command of all keys and locking devices supplies, equipment and storage areas that support the key control program. In addition, this policy will promote safety by ensuring that in case of fire or other emergency, exit keys will be readily accessible to designated correctional staff.

.2402 RESPONSIBILITY

(a) The Facility Head is responsible for developing key and lock control procedures for the correctional facility. Institutional procedures regarding key control must be clearly written and available for staff to reference but inmates must not have access to these procedures or to record keeping systems that support them.

(b) The Assistant Superintendent is responsible for ensuring that key control procedures are consistently enforced and audited to assure safe operation of the correctional facility.

(c) The Facility Head shall designate a key and lock control inventory, record keeping, making of keys, ordering of keys, issuance of keys, storage of keys, numbering of keys, and any other tasks that are related to key and lock control.

(d) All correctional employees are responsible for safe, secure, and effective key and lock control management practices. Good key control is a system that every staff member must learn and practice. Its fundamentals must be incorporated into every facility's operations and every staff member's work habits.

.2403 PROCEDURES

Facility key control procedures is a confidential document and is subject to an annual review to ensure that procedures remain consistent with day to day operation requirements. Inmates should not be permitted to establish any base of information about the facility's key control system or locking devices. Facility key control procedures must contain the following elements:

(a) Descriptions and Categories of Keys - Procedures must clearly define various categories of keys used in the facility so that staff are aware of different accountability requirements for each category. Key categories generally include the following:

(1) **Master Keys:** Cut so that one key may actuate more than one locking device in a series of locks from a single manufacturer.

(2) **Security Keys**: In the possession of unauthorized persons, these could facilitate an escape or jeopardize the security of the institution, or the safety of employees, visitors, or inmates. Immediate remedial action is necessary if a security key is lost, compromised, or missing.

(3) **Emergency Keys**. Keys maintained on key rings and kept separate from all regular-issue keys. They provide prompt access to all parts of the institution during fires, disturbances, evacuation, or other urgent situations.

(4) **Restricted Keys:** Allow access to sensitive areas of the institution. Special authorization must be obtained before they are issued to anyone other than the employee designated to draw them on a regular basis.

(5) **Non-security Keys:** Do not require immediate security response if lost or stolen.

(6) **Vehicle Keys**: Typically operates state owned vehicles including tractors and other specialized machines located inside or outside the perimeter of the facility.

(7) **Inactive Keys:** Keys no longer used but which are retained as spares and backups for active locks or spare locks. These are also keys maintained separately for other purposes, including storage for other institutions within the system.

(8) **Pattern Keys:** Keys from which all other keys for a for a particular lock or series of locks are cut. They are maintained separately from all other spare or blank keys.

(b) Key Issue System - Facility key control procedures must include a description of the key issue system. The key issue system should describe centralized points from which keys are issued with the centralized location being secure and not accessible to inmates. The system must require employee accountability as keys are issued from a central location or exchanged between employees as post assignments are changed. The key issue system should accommodate at least the following:

(1) Key Boards as required;

(2) Separate handling of state vehicle keys;

(3) Provisions for the permanent issue to an individual or to a post of selected keys;

(4) Actions required by employees who lose or break keys;

(5) Compatibility of key issue procedures with respective post orders, and

(6) A Key Issue Log.

(c) Key Handling - Procedures should specify appropriate methods of handling of keys by correctional staff. Key handling procedures should include at least the following:

(1) Keys should be carried and used as inconspicuously as possible;

(2) Keys should be securely carried.

(3) Accountability of keys should be checked and logged when keys are drawn or passed from one employee to another;

(4) Correctional staff should avoid reference to key numbers and other identifying information in the presence of inmates;

(5) Keys should never be thrown from one staff member to another or slid from one point to another across a desk or floor;

(6) Keys should never be left in locks or used to lift or pull open a lockable door;

(7) Force should not be used to operate locks, If the lock does not function easily, it should be reported and repaired, and

(8) Inmates should never be allowed to handle security keys. Inmate management of any other keys should be minimized to the greatest extent possible.

(d) Restricted Keys Use - Restricted key use procedures shall be established. Restricted keys should be issued as needed only rather than on a permanent basis. Restricted key use procedures should apply to the following sections of the facility:

(1) Armory and/or gun locker;

(2) Inmate Records Office;

(3) Property storage rooms;

(4) Personnel records storage areas;

(5) Lock shop or other key or lock storage areas;

(6) Other areas designated by the Facility Head as having special security requirements;

(7) Drug Storage:

(A) Licensed Pharmacy - G.S. 9 - 85.6 (ACCESS TO DRUG INVENTORY) requires that a licensed pharmacy manager shall have complete authority and control of all keys to locked drug cabinets in the pharmacy. The pharmacy manager is accountable to provide security and placing reasonable restrictions on access to the pharmacy area.

(B) Drug Cabinets - Correctional health care professionals are authorized for the permanent issue of keys to locked drug cabinets and locked drug storage boxes.

Keys to the above areas should be issued only to authorized staff and only after supervisory approval. A specific record shall be required to document the issue of restricted keys.

(e) Emergency Key System - Key control procedures shall provide for clear instructions pertaining to the handling of emergency keys. Emergency key procedures should include at least the following:

(1) Maintenance of emergency keys in a separate section or separate key board than other keys;

(2) A duplicate set of emergency keys to be kept in an outside armory or tower;

(3) The rotation of emergency keys to ensure that they are serviceable at all times;

(4) Regular use of emergency keys in emergency locking devices to ensure serviceability of locking devices at all times;

(5) Assignment of emergency keys to staff necessary to affect timely evacuation of dormitory housing areas, and

(6) A method of coding or identifying emergency keys for quick identification by sight and touch during emergency situations.

(f) Key Inventory - Key control procedures must provide for a current inventory of all keys and key blanks. The maintenance of this inventory will be the responsibility of the key and lock control officer. The key and lock control officer will document the inventory on a monthly basis. Any and all changes effecting the inventory in any manner must be authorized by the facility head. Keys, key blanks, and locks will be inventoried as to number, date issued out, ring location, etc. Keys or locks lost or destroyed will be logged

in a similar manner.

(g) Record Keeping - Key control procedures require accurate records of key and locking devices. A key control record system should include at least the following:

(1) Inventory of all keys and key blanks;

(2) Appropriate key issuance logs;

(3) Records of lost, damaged or replaced locks and keys;

(4) Continuous records of facility keying systems so that rationale for keying schemes and modification to keying schemes is available for review;

(h) Auditing - Facility key control procedures must require that a yearly audit be performed by the Facility Head. Annual audits must be reviewed and approved by Region Directors or their designee.

(i) Training - Key control procedures should require thorough staff training. The assistant superintendent should ensure that correctional staff receive the required initial training and regular refresher training. Training priorities should be provided to supervisory personnel and control center officers and other staff who are regularly involved in the issuance and management of keys.

.2404 OTHER REQUIREMENTS

(a) Each facilities key control procedures must include operational procedures to be followed in the event of a:

(1) Lost key ring;

(2) Lost individual key;

(3) Broken key.

(4) Broken lock.

(b) All facilities will establish procedures that require employee responsibility and accountability for the management and control of their personal keys.

(c) An employee taking a key away from the facility inadvertently shall be contacted and required to return the key to the institution promptly. Any employee who discovers that he or she has taken a key from the facility shall immediately notify the facility and return the key.

(d) Security locks and doors when not in use will be locked at all times. No security padlock should ever be left hanging without being locked closed in a manner that it cannot be removed.

(e) Any lock shops that are developed as a result of key control procedures should be located outside the secure perimeter so that inmates have no access to them.

(f) When security keys are lost or misplaced, proper security precautions must be taken to preclude use of the keys for unauthorized access or escape from the facility by inmates.

(g) The Facility Head is responsible for the security of the facility's safe combination.

(h) Key Control Procedures must be compatible with facility emergency plans in order to expedite staff response to emergency circumstances.

(i) Inmates' visitors should be discouraged from bringing personal keys into the correctional facility.

Boyd Bennett 10-12-07

Director of Prisons Date

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