

<p align="center">GEORGIA DEPARTMENT OF JUVENILE JUSTICE</p>	<p align="center">Transmittal # 17-10</p>	<p align="center">Policy # 8.12</p>
<p>Applicability: <input type="checkbox"/> All DJJ Staff <input type="checkbox"/> Administration <input type="checkbox"/> Community Services <input checked="" type="checkbox"/> Secure Facilities (RYDCs and YDCs)</p>	<p>Related Standards and References ACA Standards: 4-JCF-2A-23, 4-JCF-2A-24, 4-JCF-2A-14, 3-JDF-3A-22 DJJ 3.80, 8.5, 8.40</p>	
<p>Chapter 8: SAFETY, SECURITY, AND CONTROL</p>	<p>Effective Date: 10/31/17 Scheduled Review Date: 10/31/18</p>	
<p>Subject: KEY CONTROL</p>	<p>Replaces: 1/1/14 Secure Facilities</p>	
<p>Attachments:</p> <p>A – Request for Key/Lock Change, Addition, or Maintenance B – Key Control Audit C – Highly Restricted Key Log D – Request for Keys E – Request for Replacement of Lost Chit F – Administrative/White Chit Log G – 24-Hour Key Authorization H – Quarterly Emergency Key Inspection</p>	<p>APPROVED:</p>  <hr/> <p>Avery D. Niles, Commissioner</p>	

I. POLICY:

All secure facilities shall maintain an accountability system for keys that ensures constant control of each key. Under no circumstances will a youth be permitted to handle security or any other keys used at the facility, except those specifically issued and authorized (if any) for youth such as a personal locker key.

II. DEFINITIONS:

Back-up Key Board: The keyboard containing back-up and pattern keys located in a secure location as determined by the Director.

Emergency Keys: A ring of keys that is grouped separately from the regularly issued keys to permit ready access to the facility in the event of an emergency.

Fire Door: Doors that provide access to outside fresh air.

Highly Restricted Keys: Keys that provide access to highly sensitive areas and are issued only to authorized staff, as designated by the facility Director.

Key Control Officer: The staff member designated by the facility Director to be responsible for the storage and inventory of facility keys.

Master Key: A single key that will open all locks of a particular type.

Security Key: Any facility key which, if lost or duplicated by youth, would jeopardize the security of the facility, facility property, employees, visitors and youth and may directly or indirectly facilitate an escape.

Sub-Master Key: A single key that will open some locks of a particular type.

Chapter	Subject	Policy #	Page
SAFETY, SECURITY AND CONTROL	KEY CONTROL	8.12	2 of 10

Working Key Board: The keyboard that contains the keys issued on a regular basis for operation of the facility.

III. GENERAL PROCEDURES:

- A. The facility Director will designate a Key Control Officer to be responsible for the storage and inventory of all keys.
- B. The Key Control Officer will maintain a master inventory of all keys and keyboards.
 1. The key inventory list will include, at a minimum:
 - a) Key code number;
 - b) Door and/or room number, or lock that key operates;
 - c) Location of door, room, or lock;
 - d) Permanent issuance by position/title/names of staff possessing the keys (if applicable);
 - e) Number of keys to a lock
 - f) Back-up board number;
 - g) Working board number;
 - h) Key and lock manufacturer; and
 - i) Number of keys on back-up board and working key board.
 2. The Key Control Officer will maintain a separate inventory of the Working Key Board, the Highly Restricted Key Board, and the Back-Up Key Board. The inventory will be posted at the location of each Key Board and the Key Control Officer will maintain a copy in a central file. The inventory will include the following information, at a minimum:
 - a) Key Board hook number and/or box number;
 - b) Key code number;
 - c) Designated door/room or lock the assigned key fits; and
 - d) Number of keys on each key ring.
 3. The Key Control Officer will maintain a master count of all key blanks. Key blanks will be stored in a secure location determined by the Director.

Chapter	Subject	Policy #	Page
SAFETY, SECURITY AND CONTROL	KEY CONTROL	8.12	3 of 10

4. The Director must authorize all changes affecting the inventory in any way (see Attachment A, Request for Key/Lock Change, Addition, or Maintenance).
5. The key inventory will be adjusted as necessary to reflect the making of keys or other changes to the system.
6. The Key Control Officer will count the number of keys on one key ring each working day. This count will occur at different times each day and will be documented in the facility logbook.
7. Keys will be numbered, either by the manufacturer or by engraving, unless the size of the key makes this impossible. Identical keys will have the same number. Dissimilar keys will never have identical numbers.
8. All keys (except back-up keys) will be maintained on a metallic key ring that is tamper proof or soldered/crimped at the joint to prevent tampering, loss or removal.
9. A metal tag, showing the number of keys and the hook number, will be attached to each key ring.
10. Once per quarter, a complete audit will be conducted of the key control system. The Director will appoint someone other than the Key Control Officer to perform this function. The audit will include, at a minimum:
 - a) Inventory of keys;
 - b) Testing of all locks/keys for proper function; and
 - c) Evaluation of adherence to policy and procedure.
11. A written report using the Key Control Audit (Attachment B) will be provided to the Director and Key Control Officer detailing audit findings. Corrective action will be taken as needed.
12. Each facility Director will ensure local operating procedures provide for vehicular keys to be maintained in the control room and issued to assigned staff with documentation of receipt and return.
13. Each facility Director will ensure local operating procedures provide for the securing of the personal key rings of all persons entering the secure area of the facility, including visitors, staff regularly assigned to the facility and staff not regularly assigned to the facility.
14. Employees will avoid references to key numbers and other identifying information in the presence of youth. Employees will avoid dropping keys, keys will never be thrown from one person to another, and keys will not be slid across

Chapter	Subject	Policy #	Page
SAFETY, SECURITY AND CONTROL	KEY CONTROL	8.12	4 of 10

the floor. Keys will be carried in a secure manner on the person and will never be left unattended.

15. Padlocks will be used only for chains, gates, file cabinets and chemical/tool storage lockers. Padlocks and their keys will be inscribed with a control number and accounted for in the same manner as keys as provided for in this policy.
16. No employee will possess, alter, mark, duplicate, manufacture, make impressions of keys, or add/remove keys from rings without authorization from the Director. No employee will alter or change locking devices or doors without authorization from the Director. Any such incident will be reported via a Special Incident Report (SIR) (DJJ 8.5 Attachment A) and immediate verbal notification to the Director. The Director will cause any such incident, or suspected incident, to be thoroughly investigated. Such actions by staff or youth may result in disciplinary action, adverse employment action and/or may be referred for criminal prosecution.

- C. Employees are prohibited from taking facility keys off campus for any reason. Removal of keys from the facility may subject an employee to disciplinary action, up to and including termination. (See DJJ 3.80, Employee Progressive Discipline.)

IV. KEY BOARDS:

A. Working Key Board:

1. Regularly-issued, non-restricted keys will be assigned to the Working Key Board.
2. Every hook on the Working Key Board will be filled at all times containing either a set of keys, key chit(s), or a metal tag stamped with the working number assigned to that hook indicating that the hook is not currently assigned a key ring. Keys are stored so that their presence or absence can be easily determined.
3. The Working Key board will have sufficient hooks to accommodate all key rings and keys. Each hook on the board will be assigned a number.
4. Only one key ring will be assigned to each hook on the Working Key Board.
5. The employee assigned to the control room will check the Working Key Board upon reporting for duty assuring that they account for each key ring and will log this check in the facility logbook.
6. Key chits will be used to withdraw working keys.
7. The Working Key Board will remain locked when not being used.

B. Highly Restricted Keys:

Chapter	Subject	Policy #	Page
SAFETY, SECURITY AND CONTROL	KEY CONTROL	8.12	5 of 10

1. The following keys will be maintained as highly restricted keys:
 - a) Sub-master keys;
 - b) Master keys;
 - c) Keys to the location of the Back-Up Key Board;
 - d) Keys to the Back-Up Key Board;
 - e) Keys to the personal property storage room/area;
 - f) Keys to active and inactive records storage areas;
 - g) Keys to medication storage/administration areas;
 - h) Keys to the medical clinic;
 - i) Keys to tool and chemical storage areas;
 - j) Keys to food service areas; and
 - k) Keys to the vocational education areas.
2. Key chits will be used to issue highly restricted keys.
3. In addition to key chit exchange, highly restricted keys must be signed in and out by the staff receiving the key using the Highly Restricted Key Log (Attachment C).
4. Each Highly Restricted Key set must be stored in a separate, locked individual storage box. The front of the box will be designed so that the control room operator can see the keys or chit.
5. Staff authorized to be issued highly restricted keys will be issued an access key to the box on a 24-hour basis. Staff authorized to have access on a 24-hour basis will be documented using the 24-hour Key Authorization form (Attachment G). Each facility must develop procedures that provide for how highly restricted keys are routinely accessed, the completion of a SIR if the box is accessed by unauthorized person(s), and emergency access to highly restricted keys.

C. Back-Up Key Board:

1. The Back-up Key Board will be maintained in a secure location determined by the Director.

Chapter	Subject	Policy #	Page
SAFETY, SECURITY AND CONTROL	KEY CONTROL	8.12	6 of 10

2. The key to the location of the Back-up Key Board and the key to open the Back-up Key Board will be on a Highly Restricted Key Set. The Key Control Officer will be issued an access key to the Highly Restricted Key Set on a 24-hour basis.
3. The Back-up Key Board will not contain highly restricted keys to medication.
4. The Back-up Key Board will be arranged so that a hook is designated for each facility key.
5. Duplicate keys to the same lock will be displayed on the same hook. Excess duplicate keys that cannot be displayed on the same hook will be stored in a secure locked cabinet with an inventory posted at the location.
6. Replacement keys will be drawn from Back-up Key Board for replacement on the working/highly restricted key rings as needed by the Key Control Officer.

V. LOST, MISPLACED AND DAMAGED KEYS AND LOCKS:

- A. The Director must approve all key making, duplication or change of any key, door or lock.
 1. Requests for changes, duplication, or additional keys or locks will be made in writing to the Key Control Officer using the Request for Keys (Attachment D).
 2. The Key Control Officer will review the request and forward it with his/her recommendations to the Director for approval.
- B. Lost / Misplaced Keys:
 1. The Key Control Officer will monitor the facility logbook and any incident reports on a daily basis and correct any unresolved deficiencies regarding key control.
 2. A verbal report of any lost or misplaced key or key ring will be made to the employee's supervisor immediately, stating when loss or misplacement was discovered, circumstances surrounding that loss or misplacement, and specifically identifying the key/key ring. The staff member discovering a missing key will complete a Special Incident Report in accordance with DJJ 8.5, Special Incident Reporting.
 3. When keys are lost or misplaced, including personal key rings, local operating procedures will establish precautions (e.g., facility lockdown, emergency count, search of youth and facility, etc.) to be taken to preclude use of the key(s) for unauthorized access or escape from the facility. The Director will determine if locks should be changed.

Chapter	Subject	Policy #	Page
SAFETY, SECURITY AND CONTROL	KEY CONTROL	8.12	7 of 10

4. An employee who misplaces a key through negligence or carelessness will be subject to disciplinary action, up to and including dismissal. (See DJJ 3.80, Employee Progressive Discipline.)
5. In the event an employee carries a key home, he/she will be contacted and required to return it immediately or at the discretion of the Director or designee. Failure to adhere to this directive will result in disciplinary action, up to and including dismissal. (See DJJ 3.80, Employee Progressive Discipline.)

C. Damaged Keys, Key Rings, and Locks:

1. A verbal report of any damaged or broken key, key ring, or lock will be made to the employee's supervisor immediately, stating when the damage was discovered, the known circumstances surrounding the damage, and specifically identifying the damaged item (key, key ring, or lock). The Request for Key/Lock Change, Addition, Maintenance Form (Attachment A) will be completed before the end of the shift and submitted to the shift supervisor.
2. Force will not be used to operate locks. If the lock does not function easily, it will be immediately reported and repaired.

VI. KEY ISSUANCE:

A. Key Assignment:

1. Keys will be issued to staff based on position and level of responsibility.
2. Staff member who work in Annex Buildings outside the secure perimeter will not be allowed to take keys providing access inside the facility outside the secure perimeter.
3. No key set utilized inside the facility will contain a master key.

B. When receiving a key ring, the employee will check the key ring to ensure that it has the number of keys indicated, and that no keys appear to be damaged.

C. Chits:

1. Each employee will be provided metal key chits stamped with his/her name or assigned number. These chits will be used as receipts for all keys drawn.
2. A list of all employees' names and their assigned number will be maintained by the key control officer and at the location where keys are issued.
3. Individuals who have forgotten or lost their chit must be issued a temporary administrative white chit (Attachment E, Request for Replacement of Lost Chit). Use of an administrative white chit requires approval of the employee's

Chapter	Subject	Policy #	Page
SAFETY, SECURITY AND CONTROL	KEY CONTROL	8.12	8 of 10

supervisor and will be returned at the end of the work day. Administrative white chits will not be issued for longer than one work day. A log will be maintained of administrative chits that are issued (Attachment F, Administrative/White Chit Log).

D. Key Exchange at Shift Change:

1. For Highly Restricted Key sets, all key exchanges will take place at the control room. Highly Restricted Key sets will be accounted for with only one chit at any given time.
2. Incoming staff will receive keys in exchange for their chit, which will be placed on the key hook to indicate to whom the keys were issued. When a shift ends, outgoing staff will report to the control room to return their key sets for placement on the numbered hook and retrieve their chit.
3. If the incoming shift relieves a security post, the key exchange may take place at the post. The key chits must also be exchanged at the control room (i.e., the incoming staff member's key chit must be placed on the key hook and the outgoing staff member must retrieve his/her key chit). The incoming staff member may give the outgoing staff member his/her chit to be placed on the key hook when the outgoing staff member retrieves his/her chit.

E. Perimeter Entrance/Exit Keys:

1. Perimeter entrance/exit key ring will be a highly restricted key set that will be chitted in and out for each perimeter check, if applicable.
2. Upon completion of the Perimeter check the perimeter entrance/exit keys will be immediately returned to the control room and checked in.
3. Sally port doors operated by the control room will only be accessed via the electronic control panel. No staff will utilize keys to unlock these doors.
4. No key set utilized within the facility will contain keys with access to perimeter entrance/exits.

F. Fire (Fresh Air) Doors:

1. No key set will contain keys that access doors that lead outside the perimeter gate (an exit door that leads outside and is not contained inside the perimeter fence).
2. The Facility Director will designate staff authorized to have access to perimeter gate keys.

G. Emergency Keys:

Chapter	Subject	Policy #	Page
SAFETY, SECURITY AND CONTROL	KEY CONTROL	8.12	9 of 10

1. Keys necessary to facilitate emergency evacuation from the facility will be included on emergency key rings maintained in the control center area. These keys will be issued by control room staff in an emergency. They will be stored separately from working keys and highly restricted keys.
2. Emergency key sets must contain all keys necessary for complete evacuation of the facility. (If multiple rings are used, the rings must be attached in some way. Exceptions to this requirement must be approved in writing by the respective Deputy Commissioner of secure facilities.)
3. Each individual fire and emergency key will be color-coded and marked for identification by touch. Fire door keys (e.g., exit doors) will be marked by red color-coding and the corresponding locks will be marked for touch identification to match the respective keys.
4. Each facility door will be numbered.
5. At the location of each lock, there will be a two-inch, color-coded circle. The emergency key that opens that particular lock will be coded with the same marking and color as the circle on the lock. Fire doors will be color-coded with the color red and must match the touch identification markings on the respective key.
6. Emergency keys will be used during emergency drills, and documented using Attachment E, Drill Report (see DJJ 8.40, Emergency Management). A Special Incident Report is not necessary for pulling emergency keys during a drill. Malfunctions will be reported and corrected immediately.
7. The Key Control Officer will test emergency keys quarterly to ensure proper function (Attachment H, Quarterly Emergency Key Inspection). Necessary repairs will be made immediately. This will be documented in writing and provided to the Director.
8. All staff, but particularly security staff, will have a thorough understanding of the use of emergency keys to facilitate evacuation in an emergency. As part of initial on-the-job training, the emergency key system will be thoroughly reviewed and staff will be required to demonstrate working knowledge of the use of emergency keys.

H. Off-Site Emergency Keys:

1. An identical set of emergency keys will be maintained in a secure location away from, but near, the facility (e.g., another DJJ facility, local law enforcement facility, fire station, etc.).
2. The secure location will be provided a locked box for the storage of the facility's emergency keys.

Chapter	Subject	Policy #	Page
SAFETY, SECURITY AND CONTROL	KEY CONTROL	8.12	10 of 10

3. The keys will enable complete access to the facility in the event of an emergency.
4. The Director and senior official of the assisting location will develop a written agreement outlining who has access to these keys and under what circumstances they may be drawn. The Director will identify specific staff members who are aware of the location of these keys and how to access them.
5. When emergency key sets change, the off-site emergency key ring will also be updated.

VII. LOCAL OPERATING PROCEDURES REQUIRED: YES

- Facilities using Keywatch system must develop a local operating procedure.
- Issuance of vehicle keys.
- Process for securing the personal key rings of all persons entering the secure area.
- Procedures for how highly restricted keys are routinely accessed and emergency access to highly restricted keys.