I. POLICY:

All Community Services Offices (CSOs) that serve youth shall maintain an accountability system for keys that ensures constant control of each key. Under no circumstances will a youth be permitted to handle office or vehicle keys.

II. DEFINITIONS:

Back-up Keys: A single ring of keys that contains a duplicate of all keys.

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

Key Control Staff: The staff member designated by the Juvenile Program Manager to be responsible for the storage and inventory of the office keys.

Secured Location: A location that is only accessible by authorized staff, such as a locked box, an unlocked box behind a locked door, or a locked desk drawer.

Security Equipment: Leg Cuffs and keys, Handcuffs and keys, OC Spray, Mini DVR-Lapel, Still Camera, or Video Camera.

III. GENERAL PROCEDURES:

A. The Juvenile Program Manager (JPM) will designate Key Control Staff to be responsible for the storage and inventory of all keys.

B. Two handcuff and leg cuff keys will remain part of the security equipment verification logs (DJJ 20.9, Use of Security Equipment by Community Services Staff). The back-up keys will be stored and inventoried by Key Control Staff.
C. The Key Control Staff will maintain an inventory of all keys.

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) Permanent issuance by position/title (if applicable); and
   d) Number of keys in the key box.

2. The keys that will be inventoried will include, at a minimum:
   a) Main office door(s);
   b) Individual office door(s);
   c) File cabinets;
   d) Desks;
   e) Health records;
   f) Security Equipment Storage Cabinet;
   g) Supply closet(s);
   h) Chemical closet(s);
   i) DJJ vehicle(s); and
   j) Handcuff and Leg Cuff Keys.

3. The JPM must authorize all changes affecting the inventory in any way (see Attachment A, Request for Key/Lock Change, Addition, or Maintenance).

4. The key inventory will be adjusted as necessary to reflect the making of keys or other changes to the inventory.

D. Keys will be numbered or labeled unless the size of the key makes this impossible. Only identical keys will have the same number. The JPM will complete audits of the key control system twice per year, once in January and once in July. The audit will include, at a minimum:

1. Inventory of keys; and
2. Evaluation of adherence to policy and procedure.

E. A written report using the Key Control Audit Form (Attachment B) will be provided to Key Control Staff detailing audit findings. All key control audit forms will be kept in a labeled file located in the JPM’s office. The JPM and/or Key Control Staff will take corrective action within 7 days, if needed. A copy of the Corrective Action Plan will be forwarded to the District Director.

F. No employee will possess, alter, mark, duplicate, manufacture, make impressions of keys, or add/remove keys from rings without authorization from the JPM. Likewise, no employee will alter or change locking devices or doors without authorization from the JPM. Any such incident will be reported in writing to the JPM. The JPM 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 criminal prosecution.

G. Keys to health records must be stored in a secured location only accessible to authorized staff as maintained by the JPM. The keys to health records must be signed in and out by the staff receiving the key using the Key Log (Attachment C).

H. Back-Up Keys:
   1. The Back-up Keys will be maintained in a secure location that is accessible only to authorized staff.
   2. Replacement keys will be made from the Back-Up Key as needed by the Key Control Staff.

IV. LOST, MISPLACED, AND DAMAGED KEYS AND LOCKS:

A. The JPM 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 Staff using the Request for Keys (Attachment D).
   2. The Key Control Staff will review the request and forward it with his/her recommendations to the JPM for approval.

B. Lost/Misplaced, Damaged, or Broken Keys:
   1. A verbal report of any lost/misplaced, damaged, or broken key or key ring will be made immediately to the employee’s supervisor, stating when loss or misplacement was discovered, the circumstances surrounding that loss or misplacement, and specifically identifying the key/key ring. The staff member
discovering a missing key will complete an in-house Special Incident Report in accordance with DJJ 8.5, Special Incident Reporting.

2. When keys are lost or misplaced, including personal key rings, local operating procedures will establish precautions to be taken to preclude use of the key(s) for unauthorized access. The JPM will determine if office locks should be changed.

3. Force will not be used to operate locks. If the lock does not function easily, it will be immediately reported to the supervisor and/or the property owner. The JPM will maintain documentation of all reports of inoperable locks.

V. KEY ISSUANCE:

A. 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.

B. The JPM may issue the following keys to authorized employees on a 24-hour basis:

1. Main office door(s);
2. Individual office door(s);
3. File cabinets; and
4. Desks.

C. The Key Control Staff will use the 24-Hour Key Authorization Form to document which staff have been assigned 24-hour keys (Attachment E). The 24-Hour Key Authorization form will be maintained with the key inventory.

D. The following keys will be maintained in a secured, centralized location:

1. Vehicle(s);
2. Health records;
3. Security Equipment Storage Cabinet;
4. Supply closet(s); and
5. Chemical closet(s).

E. Emergency Keys:

1. The Back-Up Keys may serve as the emergency keys.
2. The JPM of each office may designate a set of emergency keys which allow entry into the location and offices be maintained in a secure location away from, but near, the office (e.g., another DJJ office/facility, local law enforcement facility, fire station, etc.).

   a) The keys will enable complete access to the office in the event of an emergency.

   b) The offsite location of emergency keys will be documented in the key inventory.

VI. LOCAL OPERATING PROCEDURES REQUIRED: YES