


<p align="center"><b>GEORGIA DEPARTMENT OF JUVENILE JUSTICE</b></p>	<p align="center">Transmittal # 23-4</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</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: 8/8/23  Scheduled Review Date: 8/8/24</p>	
<p>Subject: KEY CONTROL</p>	<p>Replaces: 3/15/22  Secure Facilities</p>	
<p>Attachments:   A – Request for Key/Lock Change  B – Key Control Audit  C – Key/Cylinder Ordering Request  D – Request for Replacement of Lost Chit  E – Administrative/White Chit Log  F – Quarterly Emergency Key Inspection</p>	<p>APPROVED:      _____  Shawanda Reynolds-Cobb, 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 any keys used at the facility.

**II. DEFINITIONS:**

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

**Electronic Key Storage System:** Technology driven means of storage/issuing/tracking keys in a secure environment and provides a method to generate electronic reports for accountability/inventory.

**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 Doors:** Doors that provide access to outside fresh air.

**Key Control Logbook:** A logbook maintained by the facility Key Control Officer to log all pertinent key control activities.

**Key Control Officer:** The staff member designated by the facility Director to manage the facility’s key control program.

**Knox Box:** A small wall or post mounted safe that holds Emergency keys for First Responders to retrieve in emergency situations.

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

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

**Vehicle Keyboard:** The keyboard that contains the facility’s vehicle keys.

Chapter	Subject	Policy #	Page
SAFETY, SECURITY, AND CONTROL	KEY CONTROL	8.12	2 of 9

### III. GENERAL PROCEDURES:

- A. The facility Director will designate a Key Control Officer to manage the facility's key control program. The Key Control Officer will maintain a Key Control logbook.
- B. The Key Control Officer will maintain inventories and reports of all keys and keyboards and will file them in a central location.
  1. The Master Inventory will include, at a minimum:
    - a) Key code number;
    - b) Door number, or lock that key operates;
    - c) Location of door, room, or lock;
    - d) Back-up board number;
    - e) Number of keys on back-up board; and
    - f) Keypad numbers associated with each key.
    - g) Total number of keys on Backup Keyboard and all associated keysets.
  2. The Key Control Officer will maintain a separate inventory of the Vehicle Key Board, the Back-Up Key Board, and the Emergency Keys. The Key Control Officer will maintain a physical copy of each inventory in a central location. As applicable, the inventory will include at least the following information:
    - a) Key Board hook number;
    - b) Keypad number;
    - c) Number of keys on each key ring; and
    - d) Key code numbers.
  3. The Key Control Officer will maintain the following Key Pro III reports to account for all users and keys stored in the Electronic Key Storage System:
    - a) List of Individual Key by Key Name (To reflect most current changes)
    - b) Detailed List of Users (To reflect most current changes)
    - c) Inconsistent Key Report (Weekly)
    - d) All Alarms (As needed but no less than monthly)

Chapter	Subject	Policy #	Page
SAFETY, SECURITY, AND CONTROL	KEY CONTROL	8.12	3 of 9

4. The Director must authorize all changes affecting the inventory in any way (see Attachment A, Request for Key/Lock Change).
5. The key inventory will be adjusted as necessary to reflect the removal and/or addition of keys or other changes to the system.

C. Key Inspections and Audits

1. The Key Control Officer will inspect at least 5 keysets weekly. Inspection will focus on the condition of keys to identify broken or overly worn keys. This inspection will be documented in the facility Key Control logbook.
2. 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 Key Control Audit (Attachment B) will be used to conduct the quarterly audit and provide detailed findings to the Director and Key Control Officer. Corrective action will be taken as needed.

D. Handling of Keys

1. 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.
2. All keys (except back-up keys) will be maintained on a metallic tamper-proof key ring to prevent loss, removal, or unauthorized changes.
3. A metal tag showing the number of keys and another metal tag showing the keyset number will be attached to each key ring.
4. 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.
5. 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.
6. 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 the floor. Keys will be carried in a secure manner on the person and will never be left unattended.
7. Force will not be used to operate locks. If the lock does not function easily, it will be immediately reported and repaired.

Chapter	Subject	Policy #	Page
SAFETY, SECURITY, AND CONTROL	KEY CONTROL	8.12	4 of 9

8. Padlocks will only be used 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.
9. 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.
10. Employees are prohibited from taking facility keys off campus for any reason. Removal of keys from the facility's perimeter for any reason other than work related task will subject an employee to disciplinary action, up to and including termination. (See DJJ 3.80, Employee Progressive Discipline.)
11. In the event an employee carries a key home, he/she will be contacted and required to return it immediately. Any such incident will be reported via a Special Incident Report (SIR) (DJJ 8.5 Attachment A) and immediate verbal notification to the Director. Failure to adhere to this directive will result in disciplinary action, up to and including termination. (See DJJ 3.80, Employee Progressive Discipline.)

#### **IV. KEYBOARDS:**

##### **A. Back-Up Key Board:**

1. The Back-up Key Board will be maintained in a secure location determined by the Director.
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 the Key Control Officer's keyset.
3. The Back-up Key Board will be arranged so that a hook is designated for each facility key.
4. 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.
5. Replacement keys will be drawn from Back-up Key Board for replacement of active keysets as needed by the Key Control Officer.
6. Requests to purchase additional back up keys will be documented on the Key Ordering Request (Attachment D) and submitted to all required approvers.

Chapter	Subject	Policy #	Page
SAFETY, SECURITY, AND CONTROL	KEY CONTROL	8.12	5 of 9

**B. Vehicle Keyboard**

1. Every hook on the Vehicle Keyboard will be filled at all times containing either a set of keys, key chit, or a metal tag stamped with NIU (Not in Use) indicating that the hook is not currently assigned a key ring. Keys are stored so that their presence or absence can be easily determined.
2. The Vehicle Keyboard will have sufficient hooks to accommodate all key rings and keys. Each hook on the board will be assigned a number.
3. Only one key ring will be assigned to each hook on the Vehicle Keyboard.
4. Key chits will be used to withdraw vehicle keys.
5. The Vehicle Keyboard will remain locked when not being used.

**V. LOST, MISPLACED AND DAMAGED KEYS AND LOCKS/CYLINDERS:**

A. The Director must approve all key making, duplication or change of any key, cylinder door or lock. Requests for changes to keysets or locks will be made in writing to the Key Control Officer using the Request for Key/Lock Change form (Attachment A). The Key Control Officer will review the request ensuring the integrity of the facility's master keying system remains intact and then forward it with his/her recommendations to the Director for approval.

**B. Lost / Misplaced Keys:**

1. 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.
2. Each facility will ensure that the Key Control Officer is provided a copy of the Special Incident Report as soon as possible after the incident.
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.
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.)

**C. Damaged Keys, Key Rings, and Locks:**

Chapter	Subject	Policy #	Page
SAFETY, SECURITY, AND CONTROL	KEY CONTROL	8.12	6 of 9

1. A verbal report of any damaged or broken key, key ring, or lock will be made to the employee's supervisor immediately. The Request for Key/Lock Change Form (Attachment A) and Special Incident Report (SIR) (DJJ 8.5 Attachment A) specifically stating all known circumstances surrounding the damaged item(s) will be completed before the end of the shift and submitted to the shift supervisor.
2. Each facility will ensure that the Key Control Officer is provided copies of these forms as soon as possible after the incident.

## **VI. KEY ISSUANCE:**

### **A. Key Assignment:**

1. Keys will be assigned to staff based on position and level of responsibility.
2. No key set utilized inside the facility will contain keys allowing access through the outer perimeter, with the exception of Emergency Keys and Perimeter Keys.
3. Each staff member authorized to receive keys will be issued a User ID, personal identification number (PIN), and have fingerprint templates created for access into the Electronic Key Storage System. Key restrictions will be established to provide staff with specific sets of keys based on their position. PIN's will only be used if the fingerprint readers are inoperable.
4. When removing or returning keys only one staff member at a time is authorized to be in the designated area of the Electronic Key Storage System. For facilities with multiple Electronic Key Storage Systems, one staff member is authorized at the security system and one at the non-security system, but not more than two (2) people are to be present in the room at any given time.
5. Staff will not exchange any keys with other staff members. Once a key is removed from the Electronic Key Storage System by a staff member, it must be returned into the system by the same staff member. The Key Control Officer will generate an Inconsistent Key Report weekly and provide a copy to the facility director to monitor and manage acceptable key access practices.
6. 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. Control Room:**

1. Staff will not exchange control room keys with other staff members. Once a control room key is removed from the Electronic Key Storage System by a staff member, it must be returned into the system by the same staff member.
2. There will be a control room keyset available for each shift. Each keyset will be identical to the other.

Chapter	Subject	Policy #	Page
SAFETY, SECURITY, AND CONTROL	KEY CONTROL	8.12	7 of 9

3. The employee assigned to the control room will check the Vehicle Keyboard upon reporting for duty assuring that they account for each key ring and will log this check in the facility logbook.

C. Chits:

1. Chits will be used for vehicle keys and issuance of other items requiring personnel accountability (i.e. radio's, handcuffs, leg irons, etc.).
2. Each employee will be provided metal chits stamped with his/her assigned number.
3. A list of all employees' names and their assigned number will be maintained in the central control room.
4. Individuals who have forgotten or lost their chit must be issued a temporary administrative white chit. Use of an administrative white chit requires approval of the employee's supervisor and will be returned at the end of the workday. Administrative white chits will not be issued for longer than one workday. A log will be maintained of administrative chits that are issued (Attachment F, Administrative/White Chit Log).
5. Individuals who have lost their chits will request replacement chits by submitting the Request for Replacement of Lost Chit (Attachment E) to the Key Control Officer.

D. Perimeter Entrance/Exit Keys:

1. Upon completion of the Perimeter check the perimeter entrance/exit keys will be immediately returned to the Electronic Key Storage System and checked in.
2. Sally port doors operated by the control room will only be accessed via the electronic control panel and keys for these doors will only be on the emergency keyset. Each facility Director will ensure local operating procedures provide for how and which other doors will be operated via the electronic control panel. Staff will utilize keys to unlock these doors in emergencies only.
3. No key set will contain keys that access doors/gates that lead outside the perimeter fence (an exit door that leads outside and is not contained inside the perimeter fence).

E. Emergency Keys:

1. Keys necessary to access any door large enough to house a person and to facilitate complete emergency evacuation from the facility will be included on emergency key ring maintained in the control center area. These keys will be issued by control room staff in an emergency. Emergency keys removed for periodic emergency drills or by the Key Control Officer for the Quarterly

Chapter	Subject	Policy #	Page
SAFETY, SECURITY, AND CONTROL	KEY CONTROL	8.12	8 of 9

Emergency Key Inspection is authorized and a SIR not is required. If the Emergency Keys are removed for any other reason, the shift supervisor will be notified immediately, and an SIR will be required.

2. Each facility door will be numbered.
3. At the location of each cylinder, there will be a two-inch, color-coded circle. The emergency key that opens that particular cylinder will be coded with the same marking and color as the circle on the cylinder.
4. Fire doors and their respective keys will be color-coded with red or combination of red and another color. These color-coded circles will be covered with a two-inch plexiglass circle. Both the key and plexiglass circle covers will be notched with identical notches for touch identification.
5. 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.
6. The Key Control Officer will test emergency keys quarterly to ensure proper function (Attachment H, Quarterly Emergency Key Inspection). All necessary repairs will be reported to CGL/State Maintenance staff using the appropriate work order system. If required, the Request for Key/Lock Change Form will be provided to the Director immediately upon completion of the inspection.
7. All 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.

F. 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, Knox Boxes etc.).
2. The secure location will be provided a locked box for the storage of the facility's emergency keys.
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.



<b>Chapter</b>	<b>Subject</b>	<b>Policy #</b>	<b>Page</b>
SAFETY, SECURITY, AND CONTROL	KEY CONTROL	8.12	9 of 9

5. When emergency key sets change, the off-site emergency key ring will also be updated.

**VII. LOCAL OPERATING PROCEDURES REQUIRED: YES**

- Facilities not using the electronic key storage system must develop and maintain a local operating procedure.
- Issuance of vehicle keys.
- Process for securing the personal key rings of all persons entering the secure area.
- Location of hard-copy inventory of keys and keyboards.
- How and which other perimeter doors will be operated via the electronic control panel.