

ICE/DRO RESIDENTIAL STANDARD

KEY AND LOCK CONTROL

I. **PURPOSE AND SCOPE.** Keys and locks are properly controlled and maintained, enhancing safety and security at the facility.

II. **EXPECTED OUTCOMES.** The expected outcomes of this Residential Standard are:

1. All staff will be trained in the proper care and handling of keys and locks.
2. Keys will be controlled and accounted for.
3. Locks and locking devices will be continually inspected, maintained, and inventoried.
4. Firearms will be stored in secure gun lockers before their carriers enter the facility.
5. Where required, residents have regular access to translation services and/or are provided information in a language that they understand.
6. The standard complies with federal laws and with DHS regulations regarding residents with special needs.

III. **DIRECTIVES AFFECTED.** None

IV. REFERENCES

The First Edition National Residential Standards were written using a variety of methodologies including previous and current practices, review and comment from various subject matter experts, review and comment from various government and non-government organizations, and a review of current state codes in Pennsylvania and Texas. Each standard is written in a manner that affords each resident admission and continuous housing to a family residential facility in a dignified and respectful manner.

There are no specific codes, certifications, or accreditations that deal specifically with unique management requirements of families awaiting the outcome of their immigration proceeding in a non-secure custodial environment.

American Correctional Association 4th Edition Standards for Adult Local Detention Facilities: 4-ALDF-2D-01, 7B-10.

V. EXPECTED PRACTICES

1. Proper Care and Handling of Keys and Locks

All staff shall be trained and held responsible for adhering to proper procedures for the care and handling of keys, including electronic key pads where they are used. Initial training shall be completed before staffs are issued keys, and key control shall be among the topics covered in subsequent annual training.

- a. An employee who inadvertently leaves the facility with a key ring shall return it immediately upon realizing his or her mistake (which constitutes unauthorized possession of U.S. property as well as a breach of procedures).
- b. An employee, who loses, misplaces, or otherwise cannot account for a key or key ring shall immediately alert the shift supervisor and promptly submit a written report.
- c. Staff shall never allow any resident to handle facility keys.
- d. Key rings, including those for gun lockers, shall be securely fastened to a belt with a metal clip or other approved device. Fastening keys to a holsters or belt loop is prohibited.
- e. Employees shall not refer to key numbers or other means of identification within earshot of a resident.
- f. Employees shall neither throw nor slide keys to one another.
- g. Force shall not be used to operate locks.
- h. If a key breaks inside a lock, the employee shall maintain visual oversight of the lock until its extraction. If the key breaks inside a padlock, the padlock itself shall be removed and taken to the Control Center. In every instance, the employee shall submit a memorandum on the incident to the facility administrator.
- i. It is recommended that every facility use key covers for large security keys, however, it is within the discretion of the facility to determine if key covers will be utilized.

2. Facility Staff (Key-Control Staff)

Each facility administrator shall, either, establish the position of Security Officer, or, assign a staff member the collateral security officer duties, as described herein.

a. Major Duties and Responsibilities of the Facility Staff

The Security Officer shall have a written position description that includes duties, responsibilities, and chain of command.

The Security Officer:

- 1) Reports directly to the Assistant Facility Administrator for Operations;
- 2) Conducts physical security surveys of all buildings and provides the Assistant Facility Administrator for Operations written recommendations regarding deficiencies and needed corrective actions;
- 3) Plans and practices preventive maintenance/replacement of locks and other security-devices;
- 4) Identifies technical problems or malfunctions in electronic/automated and manually operated security systems and immediately repairs them or coordinates prompt repairs with the facility maintenance department;

- 5) Overhauls, adjusts, and replaces worn parts on locking devices and systems;
- 6) Maintains, adjusts, and services machines used in the lock-shop;
- 7) Is capable of operating gas/oxygen-cutting tools and end-saw equipment in an emergency;
- 8) Conducts routine tests on emergency-exit doors;
- 9) Checks the keys to all emergency exits every 30 days and all other keys needed in emergencies quarterly, and documents the results.
- 10) Reviews all major work orders and in-house designs, plans, and specifications with the facility maintenance department for compliance with security requirements.

The facility maintenance supervisor (or equivalent) shall consult with the Assistant Facility Administrator for Operations (or equivalent) and Security Officer before proceeding with new construction and renovation projects involving door hardware.

b. Required Locksmith Training

All security staff shall successfully complete an approved locksmith training program.

The Security Officer shall complete formal locksmith training.

Locksmith training should be supplemented with training in Occupational Safety and Health Administration standards and the National Fire Prevention Association's life safety codes. Manufacturer's instructions, user manuals, product orientations, and demonstrations can also provide useful guidance.

c. Administrative Responsibilities

The Security Officer is responsible for all administrative duties, including recordkeeping, concerning keys, locks, and related security equipment.

The Security Officer:

- 1). Maintains a recordkeeping system that cross-references keys in the Control Center and lock-shop, alphabetically and numerically, to facilitate quick identification of the key or key ring needed for a particular lock;
- 2). Maintains accurate inventories of padlocks in use, master keys for cabinets, key blanks, and all keys currently in use;
- 3). Maintains for the historical record a collection of reference material on locking devices and systems, including devices and systems previously used in the facility.

d. Supervision and Training

The Security Staff shall train and direct employees in key control, including electronic key pads where they are used.

The Security Staff is responsible for training an Assistant Security Staff in all duties related to the position. The Security Staff must be proficient in all phases of security and be able to demonstrate proper equipment use to other employees.

3. Lock Shop Operation

a. Inventories

The Security Staff shall maintain inventories of all keys, locks and locking devices in the Lock Shop.

Lock Shop inventories shall include, at a minimum:

- A secure master-key cabinet containing at least one pattern key (never issued), and one or more spare keys; always locked; with all contents itemized on an inventory form.
- All key blanks, identified by model number and manufacturer's name, inventoried in a bound ledger or electronic database.
- All unassigned padlocks.
- An inventory of assigned padlocks, with locations identified alphabetically or numerically.

b. Compromised Keys and Locks

The facility administrator or Assistant Facility Administrator for Operations shall establish procedures for handling compromised keys and locks.

Compromised keys shall be cut into pieces until irremediably destroyed. The facility shall document the type of key or lock, the number of keys/locks compromised, and the date, time, and method of destruction.

c. Safe Combinations

The Security Staff shall implement procedures for protecting the integrity of all safe combination(s).

The combination for each safe shall be changed at least every 12 months and any time a staff member with access to a combination is assigned to another post. The combination to a safe shall be sealed in an envelope bearing across the flap the date and signature of the person who deposited and sealed the combination inside the envelope. Any person(s) authorized to open the envelope shall be listed, by title, on the front of the envelope. Envelopes containing safe combinations shall be stored in the lock-shop.

d. Keying, Authorized, and Non-Authorized Locks

- 1) Either deadbolts or deadlocks shall be used in resident-accessible areas.
- 2) Locks not authorized for use in resident-accessible areas include, but are not limited to: snap-, key-in-knob, thumb-turn, push-button, rim-latch, barrel or slide bolt, and removable-core-type locks (including padlocks). Any such locks in current use shall be phased out and replaced with mortise lock sets and standard cylinders.
- 3) Grand master-keying systems are not authorized.
- 4) After removing the facility number and key cuts, the Security Staff shall cut up

and dispose of worn or discarded keys and locks.

- 5) Entrance/exit door locks of housing units, work areas, chapels, gyms, and other areas with room capacity of 50 or more people shall meet the standards specified in the Occupational Safety and Environmental Health Manual (Chapter 3) and in the National Fire Protection Association Life Safety Code (#101). Panic-hardware is an acceptable alternative to such locking devices.
- 6) Individual doors to areas with room capacity of 50 or more people shall have no more than one lock for each door. Padlocks shall not be used on exit doors or intermediate doors along the exit route.
- 7) Padlocks and/or chains may not be used in a family residential center.

e. Preventive Maintenance

The Security Staff shall implement a preventive maintenance program.

The Security Staff shall perform the following preventive maintenance services, among others:

- 1). Adjust and service vehicle-gates for changing (hot/cold) weather conditions twice a year, in the spring and early fall
- 2). Adjust and service front-entrance and other gate operations at least once a year.
- 3). Lubricate all other locks quarterly, per manufacturers' instructions.
- 4). Perform maintenance checks on locks and locking systems, taking corrective action as necessary.
- 5). At least once every five years: steam-clean vehicle-gates; clean locking mechanisms of front-entrance gates, other gates, and other critical locking mechanisms using steam or other means.

The facility maintenance supervisor is responsible for door-hardware installation and maintenance (closures, hinges, pulls, kick plates, etc.), and for providing certain support services (welding, electrical-work) to the Security Staff, as needed.

f. Preventive Maintenance Documentation

The Security Staff shall maintain all preventive maintenance records.

The Security Staff's preventive maintenance files shall include:

- 1). Date,
- 2). Location of lock or locking mechanism,
- 3). Type of maintenance,
- 4). Rationale for changing key combination(s), and
- 5). Signature of service provider.

4. Key Cabinet

a. Location

An operational keyboard large enough to accommodate all facility key rings, including keys in use, shall be located in a secure area.

This operational keyboard shall be located in the Control Center.

b. Basic Construction. The key cabinet shall be constructed so that keys are visible only when being issued. Keys may never be seen by residents or visitors.

c. Small, closet-type space in the Control Center may be used instead of a cabinet, as long as:

- Access limitations are the same as for a key cabinet,
- All other key/lock standards are met, and
- The space is used solely for key control.

In the key cabinet:

- Keys in vertical rows shall be arranged in alphabetical order, and
- Keys in horizontal rows shall be arranged in numerical order.
- The label identifying the letter or number of the key ring that belongs on a particular hook shall be visible even when the key ring is on the hook.
- Any hook without an assigned key ring shall be tagged with a metal chit that indicates "hook not in use."

d. Key Rings

The Security Staff shall implement procedures for identifying every key ring and every key on each key ring, and for preventing keys from being removed from key rings, once issued.

All key rings shall be heavy-gauge wire that has been welded or brazed to prevent removal of keys from the ring.

Two metal tags of unequal size shall be attached to each key ring:

- 1) The larger tag shall identify the key ring with a number/letter corresponding to the hook number/letter.
- 2) The smaller tag shall identify the number of keys on the key ring.

e. Emergency Keys

Emergency keys shall be on hand for every area to or from which entry or exit might be necessary in an emergency.

1. Emergency keys may be kept in a separate key cabinet or in a readily identified area of the regular-issue key cabinet. A separate key cabinet located in the Control Center is recommended for the emergency keys.
2. The emergency-key cabinet shall contain a hook for each key ring. If an

emergency-key ring is kept outside the main emergency-key cabinet (for example, in a tower), a metal tag providing the key ring's location shall hang on the hook intended for that key ring in the main emergency-key cabinet.

3. The emergency keys shall be cut precisely to manufacturer's specifications.
4. Emergency keys shall not be rotated in and out of the lock shop.

5. Issue of Key Rings

a. Chit System

Facilities shall use a chit system or other standard system for the issuance and accountability of key rings.

The chit shall be labeled with the staff's first initial and last name. All key rings shall be issued as needed (at the beginning of a shift, etc.) with the exchange of a chit for a key and the chit placed on the hook from which the key was removed.

An employee who reports to work without chits must obtain temporary chits from the Control Staff, which he or she can exchange for keys according to standard procedure.

- The Control Staff shall maintain accountability for the issued chits.
- At the end of the shift, the employee shall personally return the temporary chits to the Control Staff.

At shift rotation, to obtain keys from staff on post, the relief staff must first exchange his or her key chit at the Control Center for the key chit of the employee being relieved. The relief staff shall take his or her key chit to the employee being relieved and exchange the key chit for the appropriate ring of keys. The staff shall immediately count the keys on his or her ring, immediately reporting any discrepancies to the shift supervisor. If the relief staff needs to gain access to any location(s) while heading from the control center to his or her post, the Control Staff may issue him/her a second set of keys. In this case, the staff shall return the extra set of keys to the Control Staff at the end of the relief shift.

b. Restricted Keys

The facility administrator shall establish rules and procedures for authorizing use of restricted keys.

The Control Staff must have authorization from the shift supervisor to issue a restricted key.

1). Pharmacy

Pharmacy keys shall be strictly controlled.

Ordinarily, such controls include:

- Maintaining pharmacy keys in a Restricted Keys cabinet in the Control Room and issuing them only to authorized pharmacy staff.
- Maintaining a second set in the lock shop.

In the event of an emergency that necessitates entry into the pharmacy by other than authorized pharmacy staff, the highest-ranking supervisor may authorize the withdrawal, document the reasons, and sign the authorization. Such documentation is ordinarily done via a Restricted Key form. A copy shall be sent to the Pharmacist, who shall maintain a file of such emergency authorizations.

2). ICE and EOIR Offices

Keys to ICE and EOIR (Executive Office of Immigration Review) shall similarly be restricted and controlled. If a key is authorized for emergency withdrawal, a copy of the Restricted Key form is to be provided to ICE.

b. 24-Hour Issue Keys

No key or key ring may be issued on a 24-hour basis without the facility administrator's written authorization.

A key chit identifying the borrower of the key ring shall be placed on the appropriate hook in the key cabinet, along with a metal tag marked "24-hour issue."

Individual 5" x 8" cards shall be used to record the following information about each set of 24-hour-issue keys: the key-ring identifiers (number and title), the number of keys on the ring, the individual key numbers and the door each key unlocks. Each card must bear the signatures of the authorizing facility administrator, Assistant Facility Administrator for Operations, and the employee to whom the keys are issued.

c. Security Keys

Key rings used but not issued on a 24-hour basis because the attached security keys shall be kept in a dedicated, glass-front, lockable box in the Control Center. Identical boxes may be kept and used in different departments, provided staffs are authorized to receive 24-hour keys. The key to every such box shall be issued on a 24-hour basis.

The staff member removing keys from the box shall place his or her chit on the hook in place of the key ring, returning the keys and reclaiming the chit at the end of the shift. The individual to whom the keys were issued shall personally return the keys to the box, without exception.

Security keys may not be taken off facility property (except for bus, van and other authorized-vehicle keys). As a rule, security keys shall not be issued on a 24-hour basis.

d. Key Accountability

The facility administrator shall establish written policy and implementing procedures to ensure key accountability.

The Control Staff shall conduct a key-ring audit upon reporting for duty, accounting for each key ring in the Control Center logbook and shall immediately report discrepancies in the record to the shift supervisor.

The Control Staff shall also identify broken or bent keys. All keys (regular-issue and emergency) shall be checked and counted daily.

To ensure accountability, keys shall be issued only on the assigned key rings.

e. Request for Key Change

Key-change requests shall be submitted, in writing, to the facility administrator. Upon facility administrator approval, only the Security Staff may add or remove a key from a ring.

f. Split Key Ring

The splitting of key rings into separate rings is not authorized.

6. Gun-Locker Keys

Staff shall store their weapons in individual lockers before entering the facility.

The facility administrator shall develop and implement site-specific procedures for controlling gun-locker access; however, in all facilities, gun lockers:

- a. Shall be placed in locations where staff can continuously observe them, in person or on a video-monitor, and not in any area that has resident or public access.
- b. Shall store the weapons of all on-duty staff, except those whose assignments require them to carry weapons.
- c. May not be used for long-term storage. (A staff member may arrange with the facility firearms control staff for storage of a weapon in the armory.)

Chits and logbooks are useful for maintaining accountability for gun-locker keys and gun-locker use.

Standard Approved:

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Date