

2.4 Key and Lock Control

Introduction

This U.S. Immigration and Customs Enforcement (ICE) Family Residential Standard ensures that keys and locks, including electronic keycards and codes, are properly controlled and maintained, thereby enhancing safe and secure Center operations.

Various terms used in this standard may be defined in the ICE Family Residential Standard on *Definitions*.

Program Philosophy

The requirements of this standard must be implemented in accordance with the ICE Family Residential Standard on *Program Philosophy, Goals, and Expected Outcomes*.

A. Language Access and Disability Requirements

Centers will adhere to the language access and disability laws, regulations, responsibilities, requirements, and laws cited in the ICE Family Residential Standard on *Program Philosophy, Goals, and Expected Outcomes* and the ICE Family Residential Standard on *Disability Identification, Assessment, and Accommodation*. These requirements must be promulgated in all Center policies, practices, and operations and its themes must be fully incorporated into every Center activity. This is of critical importance and will directly impact resident life, health, and safety.

Expected Outcomes

The expected outcomes of this standard are as follows (specific requirements are defined in the Expected Practices section in this standard):

1. All staff will be trained in the proper care and handling of keys and locks, and wherever used, electronic keycards and keypads with codes.
2. Keys will be accounted for and controlled.
3. Locks and locking devices will be inspected, maintained, and inventoried continually.
4. All firearms will be stored in secure gun lockers before their carriers enter the Center.

Standards Affected

This standard replaces the ICE Family Residential Standard on *Key and Lock Control* dated 12/21/2007.

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Expected Practices

A. Overview

Centers will have written policies and procedures to address the care and handling of keys, electronic keycards, and electronic codes (keys).

B. Proper Care and Handling of Keys and Locks

All staff will be trained in and held responsible for adhering to proper procedures for the care and handling of keys, including electronic key pads where used. Initial training will be completed before staff is issued keys, and key control will be among the topics covered in subsequent annual training. Ordinarily, such training will be done by the key control staff, as described below:

- An employee who leaves the Center with a key ring will return it immediately upon realizing his/her mistake or when instructed to by the Center. Such an act will constitute unauthorized possession of Center property as well as a breach of security procedures;
- An employee who loses, misplaces, or otherwise cannot account for a key or key ring will alert the Shift Supervisor immediately and submit a written report promptly;
- Under no circumstances will staff allow a resident to handle Center keys;
- Employees will neither throw nor slide keys to one another;
- Staff will not use force to operate locks. If a key fails to operate a lock, then a supervisor will be notified immediately;
- If a key breaks inside a lock, then the employee will maintain visual oversight of the lock until the problem is repaired. If the key breaks inside a padlock, then the padlock itself will be removed and taken to the control center. In every instance, the employee will submit a memorandum on the incident to the Center Administrator; and
- Centers will use key covers for large security keys to prevent residents or other unauthorized persons from observing and duplicating them.

C. Key Control Staff/Designated Locksmith

Each Center Administrator will establish the position of key control staff, or at a minimum, will assign a staff member the collateral security duties, as described herein. Centers may contract with a local locksmith provider to perform duties for which the assigned staff does not have the requisite expertise.

1. Major Duties and Responsibilities of the Key Control Staff

The key control staff and/or approved contracted locksmith will have a written position description that includes duties, responsibilities, and a chain of command.

The key control staff and/or approved contracted locksmith will have the following duties and responsibilities:

- Reports directly to the Security Manager;

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- Conducts physical security surveys of all buildings and provides the Security Manager written recommendations regarding deficiencies and needed corrective actions;
- Plans and implements adequate preventive maintenance/replacement locks and other security devices;
- Identifies technical problems or malfunctions in electronic/automated and manually operated security systems and repairs them immediately or coordinates prompt repairs with the Center maintenance department;
- Overhauls, adjusts, and replaces worn parts on locking devices and systems;
- Maintains, adjusts, and services machines used in the lock shop;
- Is trained in the operation of gas/oxygen cutting tools and end saw equipment in case of an emergency;
- Conducts routine tests on emergency exit doors;
- Checks the keys to all emergency exits every 30 days and all other keys needed in emergencies quarterly, and documents the results; and
- Reviews all major work orders and in-house designs, plans, and specifications with the Center maintenance department for compliance with security requirements.

The Center Maintenance Supervisor or equivalent will consult with the Security Manager or equivalent and key control staff/designated locksmith before proceeding with new construction and renovation projects involving door hardware.

2. Required Locksmith Training

Designated key control staff will complete an approved locksmith training program successfully or have a contractual agreement with locksmith services, preferably within the community.

This training will be supplemented with additional 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 also provide useful guidance and will be housed in a secure location.

3. Administrative Responsibilities

The key control staff member is responsible for all administrative duties, including record keeping, concerning keys, locks, and related security equipment.

The key control staff or equivalent:

- Maintains a record keeping 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;
- Maintains accurate inventories of padlocks in use, master keys for cabinets, key blanks, and all keys currently in use; and

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- Maintains, for the historical record, a collection of reference material on locking devices and systems, including devices and systems previously used in the Center.

4. Supervision and Training

The key control staff will train and direct employees in key control, including electronic key pads where used.

The key control staff member is responsible for training an assistant locksmith or designated key control staff in all duties related to the position. The designated locksmith or key control staff member must be proficient in all phases of security and be able to demonstrate proper equipment use to other employees.

D. Lock Shop Operation

1. Inventories

The key control staff member will maintain inventories of all keys, locks, key cards, electronic codes, and locking devices in the lock shop.

Lock shop inventories will include, at a minimum, the following:

- A secure master key cabinet containing at least one pattern key (never issued), and one or more spare keys. The cabinet will be kept locked except when in immediate use. The contents will be 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; and
- An inventory of assigned padlocks, with locations identified alphabetically or numerically.

2. Compromised Keys and Locks

The Center Administrator or Security Manager will establish procedures for handling compromised keys and locks.

Note: Compromised keys will be cut into pieces until irretrievably destroyed. The Center will document the type of key or lock; the number of keys or locks compromised; and the date, time, and method of destruction.

3. Safe Combinations

The key control staff will implement procedures for protecting the integrity of all safe combinations and electronic codes.

Note: The combination for each safe will be changed at least every 12 months and any time a staff member with access to a combination is assigned to another post or terminates employment. The combination to a safe will 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 will be listed, by name and title, on the front of the envelope. Envelopes containing safe combinations will be stored in the lock shop.

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Electronic codes will be kept on secure computer drives and encrypted databases. Only authorized person(s) will have access to the database. Printed hard copies of codes will be sealed in envelopes bearing across the flap the date and signature of the person who deposited and sealed the code inside the envelope. Any person(s) authorized to open the envelope will be listed, by title, on the front of the envelope. The code for electronic security devices will be changed any time staff with access to the code changes post assignments or is terminated, or if a keycard is lost or stolen.

4. Keying Authorized and Non-authorized Locks

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 will be phased out and replaced with mortise lock sets and standard cylinders.

Grand master keying systems are not authorized.

A master keying system may be used only in living and activity areas where residents have individual room keys. The number of doors will be kept to a minimum and the unit staff's key must override all functions of such locks.

After removing the Center number and key cuts, the key control staff will cut into pieces and dispose of worn or discarded keys and locks.

Entrance/exit door locks of living and activity areas, work areas, chapels, gyms, and other areas with room capacity of 50 or more people will 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.

Individual doors to areas with room capacity of 50 or more people will have no more than one lock each. Padlocks will not be used on exit doors or intermediate doors along the exit route.

Padlocks and/or chains may not be used on living and activity area/suite doors.

Padlocks and hasps may be used only where specified below:

- Fence gates in areas without ceilings;
- Freezer door interiors whose lock release systems include panic release device(s); and
- Vehicle roll-up door walk-through exit(s).

5. Preventive Maintenance

The key control staff or designee will implement a preventive maintenance program.

The key control staff will perform preventive maintenance services, including but not limited to the following:

- Adjust and service vehicle gates for changing weather conditions (i.e., hot/cold) twice a year, in the spring and early fall;
- Adjust and service front entrance and other gate operations at least once a year;
- Lubricate all other locks quarterly, per manufacturers' instructions;

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- Perform maintenance checks on locks and locking systems, taking corrective action as necessary; and
- Once every five years, at least:
 - Steam-clean vehicle gates; and
 - Clean locking mechanisms of front entrance gates, other gates, and locking mechanisms using steam or other means.

The Center Maintenance Supervisor is responsible for door hardware installation and maintenance (e.g., closures, hinges, pulls, kick plates), and for providing certain support services (e.g., welding, electrical work) to the designated locksmith or key control staff, as needed.

6. Preventive Maintenance Documentation

The key control staff will maintain all preventive maintenance records. The key control staff's preventive maintenance files will include:

- Date;
- Location of lock or locking mechanism;
- Type of maintenance performed;
- Rationale for changing key combination(s); and
- Signature of service provider.

E. Key Cabinet

1. Location

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

This operational keyboard will be located in the control center. An electronic key control box may be placed outside the control center if in a secure unit.

2. Basic Construction

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

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 will be arranged in alphabetical order;
- Keys in horizontal rows will be arranged in numerical order;

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- The label identifying the letter or number of the key ring that belongs on a particular hook will be visible even when the key ring is on the hook; and
- Any hook without an assigned key ring will be tagged with a metal chit that indicates “hook not in use.”

3. Key Rings

The designated locksmith or key control staff will 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 will be heavy-gauge wire that has been welded or brazed to prevent removal of keys from the ring.

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

- The larger tag will identify the key ring with a number/letter corresponding to the hook number/letter; and
- The smaller tag will identify the number of keys on the key ring.

4. Emergency Keys

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

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.

The emergency key cabinet will contain a hook for each key ring. If an emergency key ring is kept outside the main emergency key cabinet, then a metal tag providing the key ring's location will hang on the hook intended for that key ring in the main emergency key cabinet.

The emergency keys will be cut precisely to manufacturer's specifications.

Emergency keys will not be rotated in and out of the lock shop.

F. Issue of Key Rings

1. Chit System

Centers will use a chit system or other standard system for the issuance and accountability of key distribution. A key chit is a tag (usually metal) that identifies the person who has drawn a set of keys.

The chit will be labeled with the staff's first initial and last name. All key rings will be issued as needed (e.g., at the beginning of a shift) with the exchange of a chit for a key and with 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 room staff, which he/she can exchange for keys according to standard procedure.

Control room staff will maintain accountability for the issued chits.

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At the end of the shift, the employee will return the temporary chits personally to the control room staff.

At shift rotation, to obtain keys from a staff person on post, the relief staff first must exchange his/her key chit at the control room center for the key chit of the employee being relieved. The relief staff will take his/her key chit to the employee being relieved and exchange the key chit for the appropriate ring of keys. Staff will then count the keys on his/her ring, immediately reporting any discrepancies to the Shift Supervisor. If the relief staff needs to gain access to any location while heading from the control room center to his/her post, then the control room staff may issue him/her a second set of keys. In such a case, staff will return the extra set of keys to the control room staff at the end of the relief shift.

2. Restricted Keys

The Center Administrator will establish rules and procedures for authorizing use of restricted keys. Control room staff must have authorization from the Shift Supervisor to issue a restricted key.

Pharmacy. Pharmacy keys will 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; and
- Maintaining a second set of pharmacy keys in the lock shop.

In the event of a non-medical emergency that necessitates entry into the pharmacy by anyone other than authorized pharmacy staff, the highest-ranking supervisor on duty may authorize immediate entry to the pharmacy. The supervisor will then document the reasons for entry and sign the authorization.

Such documentation will not impede the immediate provision of emergency medical care to a resident by medical staff.

ICE and Executive Office for Immigration Review (EOIR) Offices. Keys to ICE and the EOIR office and courtroom areas will be restricted and controlled similarly. In the event that a key is authorized for emergency withdrawal, a copy of the restricted key form is to be provided to ICE.

3. 24-hour Issue Keys

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

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

Individual authorizing record forms will 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

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- The door each key unlocks.

Each record must bear the signatures of the authorizing Center Administrator, Security Manager, and the employee to whom the keys are issued.

4. Security Keys

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

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

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

5. Key Accountability

The Center Administrator will establish written policy and implementation procedures to ensure key accountability.

Control room staff will conduct a key ring audit upon reporting for duty, accounting for each key ring in the control center logbook, and will report discrepancies in the record immediately to the Shift Supervisor.

Control room staff also will identify broken or bent keys. All keys (regular issue and emergency) will be checked and counted daily.

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

6. Request for Key Change

Key change requests will be submitted, in writing, to the Center Administrator. Upon Center Administrator approval, only the designated locksmith or key control staff may add or remove a key from a ring.

7. Split Key Ring

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

G. Gun Locker Keys

Officers will store all their weapons in individual lockers before entering the Center.

The Center Administrator will develop and implement site-specific procedures for controlling gun locker access.

In all Centers, gun lockers will:

- Be placed in locations where officers can observe them continuously, in person or on a video monitor, and not in any area that has resident or public access;

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- Be used to store the weapons of all on-duty officers, except those whose assignments require them to carry weapons; and
- Not be used for long-term storage. (A staff member may arrange with the Center Firearms Control Officer for long-term storage of a weapon in the armory.)

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

References

- ICE Family Residential Standard on Definitions
- ICE Family Residential Standard on Program Philosophy, Goals, and Expected Outcomes
- National Fire Protection Association Life Safety Codes (#101)
- Occupational Safety and Environmental Health Manual (Chapter 3)