STATE OF MONTANA
DEPARTMENT OF CORRECTIONS
POLICY DIRECTIVE

Policy No. DOC 3.1.13	Subject: **KEY CONTROL**	
Chapter 3: FACILITY/PROGRAM OPERATONS		Page 1 of 5
Section 1: Security Operations		Effective Date: Feb. 1, 1997
Signature: /s/ Mike Ferriter, Director		Revised: 04/23/12

I.   POLICY

The Department of Corrections secure facilities will provide procedures and establish practices that govern the control and use of keys in accordance with the provisions of this policy.

II.   APPLICABILITY

The facilities that include Riverside and Pine Hills Youth Correctional Facilities, Montana State Prison, Montana Women's Prison, Montana Correctional Enterprises, Treasure State Correctional Training Center, and facilities contracted to the Department of Corrections, as specified in contract.

III. DEFINITIONS

Administrator – The official, regardless of local title (division or facility administrator, bureau chief, warden, superintendent), ultimately responsible for the division, facility or program operation and management.

Chief of Security – The staff person, regardless of local title (security major, director of operations), designated by the facility administrator to manage the facility security program.

Designee – The person designated to act on behalf of the person responsible for specific decisions or actions.

IV.   DEPARTMENT DIRECTIVES

A.   Key Responsibility

1. The chief of security will:
    a. oversee the facility key control program;
    b. ensure all key and lock operations effectively secure the facility;
    c. require maximum staff control over locks, keys, and locking devices;
    d. approve any keys permanently issued to staff;
    e. restrict access to sensitive keys;
    f. enable prompt emergency response; and
    g. identify and train an employee to manage the key control program.

2. Each facility will have written procedures that describe in detail the inventory, storage, issue, distribution, and handling of keys, including the staff positions responsible for key control at specific posts.

3. Where applicable, lockshop operations may be located in or adjacent to the armory; if so,

the facility will follow access controls as described in *DOC Policy 3.1.7 Emergency Equipment and Armory Operations.*

B.   Key Categories

1. Facilities will account for keys in two basic key categories:
    a. security keys are keys that if lost, or duplicated by offenders, would jeopardize the safety or security of the facility, employees, visitors, or offenders, or directly or indirectly facilitate an escape that may jeopardize public safety; and
    b. non-security keys are those that do not control access to security-type doors, grilles, or areas with hazardous or sensitive materials and, if lost, would not require urgent security action.

C.   Key Storage and Issue

1. The facility will maintain a control center key board, or its automated equivalent, as the prime issue point and the main repository for all assigned general issue, emergency, and restricted keys.

2. Facilities may have an automated key issue and inventory system that reasonably duplicates key issue, accountability, and security as described in this section.

3. The key board will:
    a. be of sufficient size to accommodate all keys and key rings routinely used;
    b. contain rows of hooks that are lettered vertically and numbered horizontally;
    c. provide one hook for each key ring identifiable by its location in the matrix of letters and numbers; and
    d. be filled at all times with one of the following: a set of keys, an employee key chit indicating drawn keys, or an appropriately numbered and stamped key chit indicating the hook is presently unused.

4. The facility will:
    a. use a durable chit-based system to issue a suitable supply of metal or plastic receipt chits inscribed with the name of each staff member authorized to draw keys;
    b. prohibit the use of temporary chits to draw keys from the control center unless authorized by the shift supervisor;
    c. affix small metal tags to each key ring, indicating the hook number of the key ring and the number of keys on the ring;
    d. solder or epoxy shut all key rings in circulation to prevent tampering or removal;
    e. establish procedures for key exchange between staff on post and relief staff, including reporting any discrepancies to the shift supervisor; and
    f. where applicable, establish a secondary secure emergency key storage area outside the facility to include keys that access the control center, armory, and lockshop area.

D.   Emergency Keys

1. The facility will:
    a. establish emergency key rings to provide access to every facility area in case of fire, riot, or other major emergency;

  b. color-code red and store emergency key rings in a separate section of the control center key board;

  c. configure and color-code each key ring to identify the doors and locks each key will open;

  d. stamp on each key ring the number of keys and whether the keys are emergency or regular issue;

  e. solder the ring shut to prevent easy removal;

  f. test the working order of emergency key rings at least quarterly and submit the inspection results in writing to the chief of security;

  g. regularly use and rotate the keys on the emergency rings to prevent uneven wear, ensure locks are properly functioning, and familiarize staff with the key system operation;

  h. forward a record of issue to the chief of security whenever a set of emergency keys is drawn;

  i. maintain a duplicate set of emergency key rings in a secure location separate from the area containing operational keys, unless the issuing point is outside the perimeter; and

  j. train all staff in the use of the emergency key system.

E. Restricted Keys

 1. The facility will:
  a. classify certain keys as restricted, e.g., keys to the pharmacy, records office, business office, warehouse;
  b. issue keys only to designated, authorized employees;
  c. ensure that any restricted key issue is approved in writing by the shift supervisor;
  d. ensure a copy of the authorization is forwarded to the chief of security;
  e. color-code all restricted keys yellow; and
  f. store on a separate section of the key board.

 2. The administrator must approve the issue of any facility keys for staff personal key rings and restrict the practice to an absolute minimum.

F. Key Accountability

 1. Facilities will have a complete accountability system that is automated and provides key issue and tracking information or a manual accountability system for all keys that meets the following requirements:
  a. a daily, manual inventory of all control center keys;
  b. an accounting of all emergency and restricted keys;
  c. a call-in system for all keys on posts;
  d. tracking the number of keys on each key ring;
  e. determining at all times who has possession of keys; and
  f. recording the key board and post inventories in a control center logbook.

 2. The chief of security must authorize all and any changes that may affect the inventory.

 3. Control center staff will contact and require any employee who may have inadvertently taken keys home to return them to the facility promptly.

4. Facility staff will:
   a. immediately inform the shift supervisor of any lost or misplaced key ring, including facts of the discovery, circumstances, and keys involved;
   b. submit the report in writing to the shift supervisor and chief of security and as soon as possible;
   c. immediately take proper security precautions to guard against unauthorized access to sensitive areas, or facility escape; and
   d. change locks at once if security keys are lost, unaccounted for, or if offenders may have made key impressions, and immediately notify other facilities that may use the same keys.

G.   Duplication of Keys

1. The facility administrator, or designee, will strictly prohibit staff from the unauthorized possession, alteration, marking, duplication, manufacture, or impression making of keys and will require staff to report any such incidents in writing to the chief of security for investigation the alleged incident.

1. Any staff involved in key duplication will be subject to disciplinary action.

3. If criminal acts are involved, the chief of security will refer the matter for prosecution.

H.   Lockshop Operations

1. Lockshop operations will reside in a secure location outside the offender area of the facility or, in the case of small facilities, may be contracted locally.

2. The lockshop operation will:
   a. store and maintain an inventory of locks, keys, and parts;
   b. use a tel-key or similar proprietary storage system to maintain patterns and spare keys for each lock;
   c. issue only duplicate keys and retain pattern keys in secure storage;
   d. employ a cross-reference system to identify which locks and keys are in use, in what locations, and on which key rings they are found;
   e. cross-index all "three-way" fits by alphabetical location of key use, cabinet hook numerical listing, and key numerical listing;
   f. identify a staff member to develop a system to regularly test and repair all locking devices and retire compromised or worn keys and locks;
   g. maintain blueprints or maps showing the location of all permanent locks; and
   h. keep accurate records of the location of all padlocks.

3. The chief of security must authorize any change in lock location or key duplication.

I.   Staff Training

1. All staff must be trained in the key control system, particularly in the emergency key system, so that in a time of crisis any staff issued keys can use them as intended.

2. Employees will be trained in the following key control principles:

      a. carry and use keys as inconspicuously as possible;

      b. fasten keys securely to the belt with a chain and carry them in pant pockets or on a wrist strap that is securely fastened to the wrist;

      c. check the count when exchanging keys from one employee to another, confirming the actual key count with that on the tag;

      d. avoid references to key numbers or any identifying information in the presence of offenders;

      e. do not drop keys; keys must be exchanged hand-to-hand, never tossed or thrown;

      f. do not use force to operate locks; if a lock does not easily function, report the malfunction to the shift supervisor;

      g. do not attempt to repair locks; this should be done only by the locksmith or other qualified employee; and

      h. do not permit an offender to handle any security keys under any circumstances.

V.   CLOSING

Questions concerning this policy should be directed to the immediate supervisor.

VI.   REFERENCES

    A.   *4-4195; ACA Standards for Adult Correctional Institutions, 4th Edition;*

    B.   *4-4186; ACA Standards Supplement, 2008*

    C.   *3-JTS-3A-22, ACA   Standards for Juvenile Correctional Facilities*

    D.   *DOC Policy 3.1.7, Emergency Equipment and Armory Operations*

VII.   ATTACHMENTS

None