



## DETENTION STANDARD

### KEY AND LOCK CONTROL (SECURITY, ACCOUNTABILITY, AND MAINTENANCE)

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#### I. POLICY

Every facility will maintain an efficient system for the use, accountability, and maintenance of keys and locks.

#### II. APPLICABILITY

The standards provided in this Detention Standard shall apply to the following facilities housing INS detainees:

1. Service Processing Centers (SPCs);
2. Contract Detention Facilities (CDFs); and
3. State or local government facilities used by INS through Intergovernmental Service Agreements (IGSAs) to hold detainees for more than 72 hours; referred to as “IGSA facilities.”

Where procedures for incorporating specific standards into a facility’s daily operations are specified (Section III., below), they are mandatory for SPCs and CDFs only. While IGSA facilities may find such procedures useful as guidelines, they are not bound by them.

Each IGSA facility may implement INS standards in a manner aligned, to the extent possible, with its generally applicable operating procedures. IGSAs shall adopt, adapt or establish alternatives to the procedures specified for SPCs/CDFs, provided they meet or exceed the objective represented by each standard.

See the separate “Definitions’ Standard for the meaning of certain terms used in this document

#### III. STANDARDS AND SPC/CDF PROCEDURES

##### A. Security Officer (Key-Control Officer)

Each facility should establish the position of Security Officer. If this is impracticable, the OIC shall assign a staff member the collateral duties of Security Officer.

##### 1. **Major Duties and Responsibilities of the Security Officer**

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

In SPCs/CDFs, the Security Officer reports directly to the Chief Detention Enforcement Officer (CDEO) and conducts physical security surveys of all buildings to determine security needs. The Security Officer submits written recommendations addressing deficiencies and corrective action(s) to the CDEO. The Security Officer plans and practices preventive maintenance/replacement for locks and other security-

devices, identifies technical problems or malfunctions in electronic/automated and manually operated security systems, immediately performs repair work or coordinates with the Maintenance Supervisor to complete repairs promptly. The Security Officer overhauls, adjusts, and replaces the worn parts on locking devices and systems; and, with the Maintenance Supervisor, reviews all major work orders and in-house designs (plans and specifications) for compliance with security requirements.

The Maintenance Supervisor will consult with the CDEO and Security Officer before proceeding with new construction and renovation projects involving door hardware.

The Security Officer maintains, adjusts, and services machines used in the lock shop; knows how to operate gas/oxygen-cutting tools and end-saw equipment in an emergency; and conducts routine tests on emergency-exit doors. The Security Officer also checks the keys to all emergency exits every 30 days; all other keys needed in emergencies, quarterly. The results of every key testing shall be documented.

## **2. Required Locksmith Training**

All security officers shall successfully complete an approved locksmith-training program.

The Security Officer in an SPC/CDF shall attend the locksmith-training course offered by the Bureau of Prisons. This should be supplemented with training in Occupational Safety and Health Administration standards and the National Fire Prevention Association's life safety codes. Manufacturers' instructions/user manuals/product orientations/demonstrations can also provide useful guidance.

## **3. Administrative Responsibilities**

The Security Officer is responsible for all administrative duties, including recordkeeping, concerning keys, locks, etc.

In SPCs/CDFs, the Security Officer maintains a recordkeeping system that cross-references keys in the Control Center and lock-shop, alphabetically and numerically. This facilitates quick identification of the key or key ring needed for a particular lock.

The administrative duties shall include maintaining accurate inventories of padlocks in use, master keys for cabinets, key blanks, and all keys currently in use.

For the historical record, the Security Officer shall maintain a collection of reference material on locking devices and systems, including devices and systems previously used in the facility.

## **4. Supervision**

The Security Officer shall train and direct employees in key control.

In SPCs/CDFs, the Security Officer is responsible for training an Assistant Security Officer in all duties related to this position. The Security Officer must be proficient in all phases of security, and able to demonstrate proper equipment use to other employees.

## **B. Lock Shop Operation (Keys, Locks, and Locking Mechanisms)**

### **1. Inventories**

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

In SPCs/CDFs, Lock Shop inventories shall include, among other things:

- a. 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.
- b. All key blanks, identified by model number and manufacturer's name, inventoried in a bound ledger or electronic database.
- c. All unassigned padlocks.
- d. An inventory of assigned padlocks, with locations identified alphabetically or numerically.

### **2. Compromised Keys and Locks**

The OIC shall establish procedures for handling compromised keys and locks.

In SPCs/CDFs, 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.

### **3. Safe Combinations**

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

In SPCs/CDFs, the combination for each safe will be changed at least every 12 months and any time staff with access to the combination(s) is assigned to another post. The combination to a safe shall be sealed in an envelope bearing the date and signature, across the flap, 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.

### **4. Keying, Authorized, and Non-Authorized Locks**

- a. Either deadbolts or deadlocks shall be used in detainee-accessible areas.
- b. Locks not authorized for use in detainee-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.
- c. Grand masterkeying systems are not authorized.
- d. A masterkeying system may be used only in housing units where detainees have individual room keys. The number of doors will be kept to a minimum and the Unit Officer's key must override all functions of this lock.

- e. After removing the facility number and key cuts, the Security Officer shall cut up and dispose of worn or discarded keys and locks.
- f. 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). Specifically, the doors shall be equipped with prison-type locking devices modified to function when pressure is applied from inside the room. Panic-hardware is an acceptable alternative to the prison-type-locking device.

Individual doors to large-capacity areas (50 people or more) shall have no more than one lock each. Padlocks shall not be used on exit doors or intermediate doors along the exit route

Padlocks and/or chains shall not be used on cell doors.

In SPCs/CDFs:

- a. Padlocks and hasps may be used only where specified:
  - 1. Fence-gates in areas without ceilings;
  - 2. Freezer-door interiors whose lock-release systems include panic-release device(s);
  - 3. Vehicle roll-up door walk-through exit(s).
- b. Entrances and exits from the secured perimeter will be sally ported, with all doors and gates interlocking electronically. (Only one door can unlock at a time, canceling the electrical control of other doors until the unlocked door is returned to its secure position.)
- c. Prison-type security keys and/or blanks (active, non-active, or discarded) shall under no circumstances be used or distributed for presentation purposes.

## **5. Preventive Maintenance**

The Security Officer shall implement a preventive maintenance program.

In SPCs/CDFs, the Security Officer shall perform the following preventive maintenance services, among others:

- a. Adjust and service all cellblock-locking mechanisms in the Special Management Unit and in housing units with secure rooms, at least once a year.
- b. Adjust and service vehicle-gates for changing (hot/cold) weather conditions twice a year, in the spring and early fall.
- c. Adjust and service front-entrance and other gate operations at least once a year.
- d. Lubricate all other locks quarterly, per manufacturer's instructions.
- e. Perform maintenance checks on locks and locking systems, taking corrective action as necessary.
- f. At least once every five years: steam-clean vehicle-gates; clean locking mechanisms of front-entrance gates, other gates, and cellblock locking mechanisms using steam or other means.

The 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 Officer, as needed.

## **6. Preventive Maintenance Documentation**

The Security Officer will maintain all preventive-maintenance records.

In SPCs/CDFs, the Security Officer'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.

## **C. Key Cabinet**

### **1. Location**

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

In SPCs/CDFs, this operational keyboard shall be located in the Control Center.

### **2. Basic Construction**

In SPCs/CDFs, the key cabinet shall be constructed such that keys will be visible only when being issued. Keys shall never be seen by detainees or visitors. If small, closet-type space becomes available in the control area, staff may use it instead of the cabinet. In that case, access limitations shall be the same as for a key cabinet; other key/lock standards shall also apply; and the space shall be used solely for key control.

In the key cabinet, keys in vertical rows shall be arranged in alphabetical order; 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 indicating "hook not in use."

### **3. Key Rings**

The Security Officer 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.

In SPCs/CDFs, 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. The larger tag will identify the key ring with a number/letter corresponding to the hook number/letter; the smaller tag will identify the number of keys on the key ring.

### **4. Emergency Keys**

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

In SPCs/CDFs:

- a. 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.
- b. 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 (e.g., in a tower), 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.
- c. The emergency keys shall be cut precisely to manufacturer's specifications.
- d. Emergency keys will not be rotated.

#### **D. Issue of Key Rings**

##### **1. Chit System**

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

In SPCs/CDFs, the metal-chit system shall apply. The chit will be labeled with the officer's first initial and last name. All key rings shall issued as needed (at the beginning of a shift, etc.) with the exchange of a chit for a key. The key chit shall hang on the vacant hook from which the key was removed.

An employee who reports to work without chits must obtain temporary chits from the Control Officer, which he/she can exchange for keys according to standard procedure. At the end of the shift, the employee shall personally return the temporary chits to the Control Officer.

The Control Officer will maintain accountability for the issued chits.

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

##### **2. Restricted Keys**

The OIC will establish rules and procedures for authorizing use of restricted keys.

In SPCs/CDFs, the Control Officer must have authorization from the shift supervisor to issue a restricted key.

##### **3. 24-Hour-Issue Keys**

No key(s) shall be issued on a 24-hour basis without the OIC's written authorization.

In SPCS/CDFs, 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 will 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 will unlock. Each card must bear the signatures of the authorizing OIC and CDEO, and the employee to whom the keys are being 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 is 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 shall place his/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 will not be issued on a 24-hour basis.

#### **5. Gun-Locker Keys**

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

The OIC shall develop and implement site-specific procedures for controlling gun-locker access. However, the following standards apply to all facilities:

- a. Gun lockers shall be placed in locations where officers can continuously observe them, either in person or on a video-monitor.
- b. Gun lockers store the weapons of all on-duty officers, except those whose assignments require them to carry weapons.
- c. Using the gun locker for long-term storage is prohibited. An officer in need of storage space shall arrange with the Firearms Control Officer to place the weapon in the armory for an indefinite period.
- d. Chits and logbooks are tools useful in maintaining accountability for gun-locker keys and gun-locker use.
- e. Gun lockers shall not be located in an area that has detainee or public access.

#### **6. Key Accountability**

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

In SPCS/CDFs, the Control Officer shall conduct a key-ring audit upon reporting for duty, accounting for each key ring in the Control-Center logbook. The officer will immediately report discrepancies in the record to the shift supervisor.

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

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

#### **7. Request for Key Change**

Key-change requests shall be submitted, in writing, to the OIC. The Key-Control Officer alone shall add or remove a key from a ring, upon OIC approval.

#### **8. Split Key Ring**

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

#### **9. Proper Care and Handling of Keys**

All staff members shall be trained and held responsible for adhering to proper procedures for the care and handling of keys.

- a. An employee who inadvertently leaves the facility with a key ring will return it immediately upon realizing his/her mistake (unauthorized possession of U.S. property, breach of procedures).
- b. An employee, who loses, misplaces, or otherwise cannot account for a key/key ring shall alert the shift supervisor, promptly following-up with a written report.
- c. Under no circumstances will staff allow a detainee 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 detainee.
- f. Employees shall neither throw nor slide keys to one another.
- g. Force will 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 will be removed and taken to the Control Center. Whatever happens, the affected employee shall submit a memorandum on the incident to the OIC.

**IV. AMERICAN CORRECTIONAL ASSOCIATION STANDARDS REFERENCED**

American Correctional Association 3rd Edition Standards for Adult Local Detention  
Facilities: 3-ALDF-3A-21

**Approval of Standard**



**Michael D. Cronin**  
**Acting Executive Associate Commissioner**  
**Office of Programs**

SEP 20 2000

**Date**



**Michael A. Pearson**  
**Executive Associate Commissioner**  
**Office of Field Operations**

SEP 20 2000

**Date**

**U.S. Immigration and Naturalization Service  
NATIONAL DETENTION STANDARDS  
MONITORING INSTRUMENT**

**Policy** It is the policy of the INS Service to maintain an efficient system for the use, accountability and maintenance of all keys and locks.

<b>KEY AND LOCK CONTROL (SECURITY, ACCOUNTABILITY AND MAINTENANCE)</b>			
<b>Components</b>	<b>Yes</b>	<b>No</b>	<b>Remarks</b>
1. Does each facility have the position of Security Officer? If not a. Is a staff member appointed the collateral duties of security officer?			
2. Does the security officer have a written position description?			
3. Has the security officers attended an approved locksmith training program? a. Successfully complete?			
4. Is the security officer responsibly for all administrative duties and responsibilities relating to keys, locks etc.?			
5. Does the security officer provide training to employees in key control?			
6. Does the security officer maintain inventories of all keys, locks and locking devices?			
7. Does the security officer follow a preventive maintenance program? a. Maintains all preventive maintenance documentation?			
8. Does the facility policies and procedures address the issue of compromised keys and locks?			
9. Has the security officer developed policy and procedures to ensure safe combinations integrity? a. Is that policy maintained?			
10. Are only dead bolt or dead lock functions used in detainee accessible areas?			
11. Are any of the non-authorized locks (as specified in the Detention Standard) used in detainee accessible areas?			

**KEY AND LOCK CONTROL  
(SECURITY, ACCOUNTABILITY AND MAINTENANCE)**

Components	Yes	No	Remarks
12. Does the facility use the grand master keying systems?			
13. Are all worn or discarded keys and locks cut up and properly disposed of ? a. Are the key cuts and facility number removed?			
14. Are padlocks and/or chains used on cell doors?			
15. Do the entrance/exit door locks to detainee living quarters, or areas with an occupant load of 50 or more people, conform to a. Occupational Safety and Environmental Health Manual, Chapter 3? b. National Fire Protection Association Life Safety Code 101?			
16. Is the operational key cabinet sufficient to accommodate all the facility key rings including keys in use a. Is it located in a secure area?			
17. In SPCs/CDFs, is the key cabinet constructed so keys will not be visible except during issue?			
18. Are procedures in place to ensure that key rings are a. Identifiable? b. Numbers of keys on the ring are cited? c. Keys cannot be removed from issued key rings?			
19. Are emergency keys available for all areas of the facility?			
20. Does the facilities use a chit system for issuance and accountability of key rings? If not a. What system is used?			
21. Is authorization necessary to issue any restricted key? a. Who provides the authorization?			

**KEY AND LOCK CONTROL  
(SECURITY, ACCOUNTABILITY AND MAINTENANCE)**

<b>Components</b>	<b>Yes</b>	<b>No</b>	<b>Remarks</b>
22. Does the OIC authorize all keys issued on a 24-hour basis, in writing? If not a. Whom? b. Are they kept in an individual lockable box with a glass front in the facility control center? c. Are they permitted to be taken off facility property?			
23. Are individual gun lockers provided? a. Are they located in an area that permits constant officer observation, b. Are gun lockers located in an area that has detainee or public access? c. Are gun lockers used as a permanent or long-term storage space for any individual officer?			
24. Does the facility have a key accountability policy and procedures to ensure key accountability? a. Are the keys physically counted daily?			
25. Are all key change requests made in writing to the OIC? a. Is the designated key control officer the only employee who is authorized to add or remove a key from a ring?			
26. Is the splitting of key rings into separate rings authorized?			
27. Are all staff members trained and held responsible for adhering to proper procedures for the handling of keys? a. Are issued keys returned immediately in the event an employee inadvertently carries a key ring home? b. When a key or key ring is lost, misplaced, or not accounted for, is the shift supervisor immediately notified? c. Is a detainee permitted to handle keys assigned to staff?			

**U.S. Immigration and Naturalization Service  
NATIONAL DETENTION STANDARDS  
MONITORING INSTRUMENT**

**KEY AND LOCK CONTROL  
(SECURITY, ACCOUNTABILITY AND MAINTENANCE)**

**Verification Sources:**

The following may serve as sources of information for auditors verifying the facility's compliance with this detention standard:

SOURCE	TIME	DATE	LOCATION
A. Observing key distribution			
B. Observing Officer behavior			
C. Inspection of Lockshop			
D. Facility's written policy and procedures.			
E. Detainee and staff interviews			

Facilities must complete the attached Plan of Action for bringing operations into compliance. For each element found out of compliance, the plan of action will specify remedial action and the estimated timetable for compliance.

**Remarks:** *(Record significant facts, observations, other sources used, etc.)*

\_\_\_\_\_  
Auditors Signature

\_\_\_\_\_  
Date