CHAPTER: 700
Operational Security

DEPARTMENT ORDER:
702 – Key Control

OFFICE OF PRIMARY RESPONSIBILITY:
OPS

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ACCESS
☐ Contains Restricted Section(s)

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PURPOSE [Revision – December 21, 2014]

This Department Order establishes a system for Department key control providing an exact accounting for all keys. The system establishes requirements for the continuous control and accountability of all keys in Central Office buildings, Department institutions, and private prisons.

PROCEDURES

1.0 CENTRAL OFFICE KEY CONTROL

1.1 Central Office Building Access

1.1.1 Employees shall use their magnetic strip identification cards for Central Office building access, in accordance with Department Order #515, Identification System. [Revision – November 9, 2018]

1.1.2 Communications staff shall provide Central Office building access to authorized staff outside of regular business hours.

1.2 Central Office employees with valid reasons for requesting keys/key cards/key rings for specific Central Office rooms/areas shall submit memorandums to their immediate supervisor, specifying their reason or reasons for the request.

1.3 Immediate supervisors shall forward key/key card/key ring access requests through their chain of command to the appropriate Central Office key access approval authority (i.e., Deputy Director, Division Director/Assistant Director, Bureau Administrators, etc.). [Revision – December 21, 2014]

1.4 Central Office key access approval authorities receiving key/key card/key ring request memorandums shall:

1.4.1 For approved requests, indicate approval of valid key access requests by signing and dating the memorandums and forwarding them to the Central Office Physical Plant Supervisor for additional review and approval.

1.4.2 For disapproved requests, return memorandums to submitting employees.

1.4.2.1 Key access approval authorities shall indicate the reason or reasons for denying requests.

1.5 The Central Office Physical Plant Supervisor shall:

1.5.1 Determine access methods for all Central Office building rooms/areas.

1.5.2 Review key/key card/key ring access memorandums received from key access approving authorities to ensure approved access requests are relevant to the performance employees’ work duties, and then issue appropriate building keys/key cards/key rings.

1.5.2.1 The Central Office Physical Plant Supervisor shall inform key access approving authorities of any requests not relevant to the performance of employees’ work duties.
1.5.3 Ensure all building keys/key cards/key rings are stamped or marked with permanent identifying numbers.

1.5.4 Ensure all Central Office keys/key cards/key rings’ identifying numbers are recorded when issued.

1.5.5 Maintain all un-issued, spare and returned building keys/key cards/key rings in a secure area and manner.

1.5.6 Maintain an inventory record of all issued Central Office building keys/key cards/key rings.

1.5.7 Conduct annual audits of building key assignments for each Central Office Division and Bureau to determine assignment accuracy and compliance with this Department Order.

1.5.8 Forward copies of annual audit reports to the Deputy Director or appropriate Division Director/Assistant Director and Bureau Administrators, etc. when inaccuracy and/or noncompliance problems are discovered. [Revision – December 21, 2014]

1.6 Central Office employees receiving approval for keys/key cards/key rings to Central Office rooms/areas shall:

1.6.1 Complete and sign Receipt of Permanent Issue Keys/Key Rings, Form 702-5 for each Central Office building key/key card/key ring.

1.6.2 Accept responsibility for the security of issued building keys/key cards/key rings.

1.6.3 Ensure issued keys/key cards/key rings are not duplicated or loaned.

1.6.4 Keep issued building keys/key cards/key rings in their personal possession and control at all times.

1.6.4.1 Issued keys/key cards/key rings shall not be left in office desks or other office storage areas.

1.6.5 Immediately report any lost or missing building keys/key cards/key rings to the Central Office Physical Plant Supervisor.

1.6.6 Return building keys/key cards/key rings to the Central Office Physical Plant Supervisor if they are no longer needed due to changes in employment status or work location.

1.6.6.1 Costs associated replacing keys/key rings and/or re-keying locks shall be assessed and may be withheld from employees’ paychecks if employees fail to return all keys/key rings they are responsible for.

2.0 KEY INVENTORY, STORAGE, ISSUANCE AND INSPECTIONS

2.1 Wardens and Deputy Wardens shall ensure master key inventories are maintained specifying the following:

2.1.1 Key and key tag numbers
2.1.2 Lock/locking device locations

2.1.3 The number of keys available for each lock/locking device

2.1.4 The number of keys on each key ring

2.2 All keys/key rings including emergency keys and locking devices shall be:

2.2.1 Commercially manufactured and can be permanently fastened closed.

2.2.2 Inspected monthly for proper function.

   2.2.2.1 Repair or replacement of keys/key rings shall be completed as needed and documented on Locksmith Work Order, Form 702-6.

   2.2.2.2 Inspectors shall prepare inspection reports and submit them to Wardens and Deputy Wardens.

   2.2.2.2.1 Inspection reports shall be retained in accordance with Department Order #103, Correspondence/Records Control.

2.3 All keys/key rings including emergency keys shall:

2.3.1 Have tags attached stamped with the number of keys on the ring.

2.3.2 Be issued from a designated central control area and/or main control room.

2.3.3 Be stored in such a manner as to:

   2.3.3.1 Prevent inmate access when they are not in the possession of a staff member or other authorized person.

   2.3.3.1.1 Inmates shall not possess keys/key rings unless with prior Warden or Deputy Warden written approval using Inmate Key Receipt, Form 702-4.

   2.3.3.1.2 In the event an inmate’s work status requires the issuance of a key on a daily/temporary basis, staff issuing the key shall note the action on the Key and Credit Card Control Log, Form 702-1. [Revision – July 29, 2012]

   2.3.3.2 Allow easy determination of the presence or absence of keys/key rings.

   2.3.3.3 Provide an exact accounting for all institution/unit keys to include present locations and possessors.

2.3.4 Be inventoried at the beginning and ending of each shift and documented on the appropriate logs by assigned staff.

2.4 Issuing and Returning of Keys and Key Rings - Assigned central control and/or main control room employees shall document the following entries on the Key and Credit Card Control, Form 702-1:

2.4.1 Key/key ring number
2.4.2 Date of issue and return
2.4.3 Name of employee or other authorized person to whom the key/key ring was issued
2.4.4 Initials of the staff member who issued keys and/or key rings
2.4.5 Name of the staff member or other authorized person returning keys/key rings
2.4.6 Initials of the staff member to whom the key/key ring was returned

2.5 Employees Key/Key Ring Responsibilities
2.5.1 Employees permanently issued keys/key rings shall complete the Receipt of Permanent Issue Keys/Key Rings, Form 702-5.
2.5.2 Employees shall be responsible for the safe-keeping and control of keys/key rings issued to them until they are formally relinquished and returned to the control area.
2.5.3 Pharmacy and Medical keys are issued and maintained in accordance with Health Services Division Technical Manual and this Department Order. [Revision – December 21, 2014][2]

2.6 Wardens and their designees shall have unrestricted access to all areas of the institution and shall be accountable for any area they access. [Revision – December 21, 2014][2]

2.7 Shift Commanders shall also have keys for all areas of the Kitchen and Inmate Commissary. [Revision – July 29, 2012: Sections 2.7 and 2.7.1]
2.7.1 This Key-set shall be a pass along set and always be in possession of the senior ranking security supervisor (Shift Commander) of the shift.

3.0 KEY DUPLICATIONS

3.1 Keys shall not be duplicated without the written approval of the Warden, or designee. All materials for duplication/repair of keys shall be secured when not in use.
3.1.1 Duplicate emergency keys rings may be maintained/stored in a secure control room.

4.0 LOCKOUT/TAGOUT SYSTEMS - Wardens, Deputy Wardens, and Administrators shall ensure an isolated lock and key system exists through the use of Lockout/Tagout Program in accordance with Department Order #404, Fire, Safety and Loss Prevention. The Lockout/Tagout Program shall operate in accordance with 29 Code of Federal Regulations (CFR) Part 1910.147, OSHA Control of Hazardous Energy Standard. [Revision – November 9, 2018: Section 4.0 thru 4.2.4.2]

4.1 Lockout/Tagout systems shall be maintained and administered by the Physical Plant Manager/Administrator or Arizona Correctional Industries Operations supervisor who shall supply sufficient keys, locks, and disabling devices.
4.2 The Physical Plant Manager/Administrator or supervisors shall ensure each employee engaging in the installation, removal, repair, or maintenance of machinery or systems are issued their own Lockout/Tagout lock box consistent with their job discipline.
4.2.1 Lockout/Tagout locks and keys shall not be of the same type utilized in security operations. Example: Best or Arrow key systems with the same keyway or core are not appropriate due to their use in securing areas of an institution against unauthorized access.

4.2.1.1 Once a Lockout/Tagout lock has been placed, the key shall remain with the employee until they determine the device is approved for safe operation.

4.2.1.1.1 The employee is not required to return the key to the Lockout/Tagout box until the lock has been removed.

4.2.1.2 Authorized Personnel who place a lock or Lockout/Tagout Tags on equipment, machines or systems are responsible for their removal. The Physical Plant Manager/Administrator shall develop procedures in accordance with Department Order #404, Fire, Safety and Loss Prevention that address the steps required to remove the Lockout/Tagout lock in the event of an emergency.

4.2.2 The Lockout/Tagout system shall remain exempt from the Emergency Key and Correctional Service Log, Form 105-6, requirements of this Department Order.

4.2.3 Lockout/Tagout boxes shall be maintained at a Complex Tool Room when not in use.

4.2.4 Lockout/Tagout locks shall:

4.2.4.1 Be individually keyed with only a single key existent for the lock. Additional copies of Lockout/Tagout keys are not authorized.

4.2.4.1.1 Lockout/Tagout keys shall be issued to the assigned staff member as a PIK (personally issued keys) set and shall be kept on that person at all times while on duty.

4.2.4.2 Not be utilized as a security device except in the manner outlined in this section.

5.0 EMERGENCY KEY RINGS

5.1 Wardens or their designees shall identify locks and locking devices that affect life, health or safety and designate keys to those areas as emergency keys.

5.2 At institutions where the units are closely located, emergency key rings shall be maintained or stored in the institution’s main control room.

5.3 At institutions where the units are not closely located emergency key rings shall be maintained or stored at the unit main control rooms.

5.4 When colored seals/tags on emergency key boxes are broken to receive emergency key sets, two employees shall be present for the inventory.

5.4.1 Two employees shall also be present when emergency key sets are returned to key boxes and new colored seals are put in place.
5.4.2 The names of both employees shall be logged in the Correctional Service Log, Form 105-6. [Revision – December 21, 2014]

5.5 Subject to the approval of the Division Director for Prison Operations or designee, Wardens shall establish a standardized color-code system to identify each building or area within each unit.

5.5.1 Each door or lock within a building or area having a key on an emergency key ring shall be marked with the color and alpha designator for the key.

5.6 Emergency key rings shall be:

5.6.1 Coded using the standardized "Alpha/Color Dot System" of identification and shall enable staff to access every area of the institution/facility rapidly to respond to a disturbance, fire or any other crisis.

5.6.2 Clearly delineated from all other keys and stored in a separate key box than key rings used for regular operational purposes.

5.6.3 Commercially manufactured, approved by the Division Director for Prison Operations and of a type that can be permanently closed.

5.6.4 Coded and configured to provide access to a specific building or area of the institution or unit. Key rings shall be color-coded to match the assigned building color.

5.6.5 Tagged with a red-colored metal tag attached stamped with the assigned number of keys on the ring and the key ring number on the opposite side of the tag.

5.7 All doors or locks within a building or area having keys on emergency key rings shall be marked with the color and alpha designator for the key.

5.7.1 Markings shall consist of a colored circle, or dot, with the alpha designator stenciled within the circle.

5.8 Individual keys shall be identified by having the alpha designator for the door each key fits engraved on the key. Manufacturer numbers shall be removed from the key and shall not be used to identify the key. Manufacturer numbers shall be maintained in the master key inventory.

6.0 KEY CONTROL VIOLATIONS

6.1 Key control violations constitute major security breaches. Employee negligence in failing to follow key control practices shall result in disciplinary action in accordance with Department Order #601, Administrative Investigations and Employee Discipline.

6.2 Employees terminating employment or transferring to other work sites shall return all keys/key rings they are responsible for on their last work day.

6.2.1 Costs associated replacing keys/key rings and/or re-keying locks shall be assessed and may be withheld from employees’ paychecks if employees fail to return all keys/key rings they are responsible for.
6.3 All missing keys shall be reported immediately to security staff.

6.3.1 Employees discovering the loss or misplacement of keys/key rings shall immediately:

6.3.1.1 Notify their supervisor.

6.3.1.2 Initiate a search for the keys/key rings.

6.3.1.3 Submit an Information Report, Form 105-2, to the shift supervisor.

6.4 Employees inadvertently taking keys/key rings off of institution/unit grounds shall immediately return them to the institution/unit and submit an Information Report to the shift supervisor.

IMPLEMENTATION [Revision – December 21, 2014][2]

Within 90 calendar days of the effective date of this Department Order, the Division Director for Prison Operations or designee shall address the contents of this Department Order in authorized Post Orders where appropriate.

DEFINITIONS/GLOSSARY

Refer to the Glossary of Terms

FORMS LIST

702-1 – Key and Credit Card Control Log
702-4 – Inmate Key Receipt
702-5 – Receipt of Permanent Issue Keys/Key Rings
702-6 – Locksmith Work Order

AUTHORITY

A.R.S. §13-3715, Unauthorized Manufacture, Duplication, Use or Possession of Key to a Public Building; Classification