**POLICY & PROCEDURE DOCUMENT**

NUMBER:     6.0100
                        9.0100

DIVISION:     Student Affairs
                        Campus Services and Facilities

TITLE:          Key Control Policy and Procedures

DATE:          February 28, 2011

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**I. Purpose and Scope**

The WKU Police Department provides key/lock services through the WKU Police/Access Control Section for campus buildings under the direction of the Vice President of Student Affairs.  All persons using University keys, whether assigned or on a check-out basis, shall subscribe to this policy.

A. Definitions

   1. *Authorized Agent*: The individual designated by the administrative or department head as responsible for the issuance, control, and return of keys for a unit or department.

   2. *Authorization Form*: This form must be on file in the WKU Police/Access Control Section before keys can be issued and shows the authorized agents for each department if it is someone other than the administrative or department head responsible for the issuance, control, and return of keys for a unit or department.

   3. *Emergency Management Core Group*:  This group is a subset of the Emergency Management Committee.  Members of the Core Group are represented by the following positions: Assistant Chief of Police, Chief of Staff/General Counsel, Communications/Staff Services Commander, Director of Human Resources, Director of Communications Technologies, Director of Media Relations and Director of Environmental Health and Safety.  Additional members to be added will include representatives from the Athletics Department, Faculty, Housing and Department of Facilities Management.

4. *Key Request*: The head of the administrative unit or Authorized Agent must complete a Key Request Form available at http://www.wku.edu/accesscontrol/documents/key-request.pdf and submit it to the WKU Police/Access Control Section by inter-campus mail, walk-up, or **fax 5-2892**.  Note: the WKU Police/Access Control Section Administrator reserves the right to confirm with the Authorized Agent of the requesting department any faxed requests before issuing any keys.  The request will contain:

   a. The department/unit's name;
   b. The name of the administrative/department head or Authorized Agent or Designee responsible for the issuance, control, and return of keys for a unit or department;
   c. The administrative/department head or Authorized Agent or Designee's telephone number;
   d. The administrative/department head or Authorized Agent or Designee's email address;
   e. The administrative/department head or Authorized agent or Designee's building and room number;
   f. The specific keys requested;
   g. The account number to be charged for the key(s);
   h. The signature of the administrative/department head or Authorized Agent responsible for the issuance, control, and return of keys for a unit or department.

5. *Key Control System*: The electronic system used to record key actions such as issuance, loss, theft, or return.

6. *Re-key/Re-core*: When the physical keys and/or cores must be removed, replaced, or re-worked in order to restore pre-event security.

**II. Policy**

A.  Overview of key inventory control, replacement and recovery

1. Keys are to be issued for the purpose of conducting University business only.

2. Faculty, staff, and students are issued keys upon the written authorization of a WKU appointed administrative head, dean, departmental chair or his/her designee.  The WKU Police/Access Control Section should be notified in writing when a designee is appointed. Authorized Agent Form Link:
http://www.wku.edu/accesscontrol/documents/authorized-agent-form.pdf

3. Keys are to be issued based on the need for access, not convenience.  Only those keys needed for regular work assignments shall be authorized.  Keys shall be issued only for the locks required for the duties of the key holder.  Keys shall not be used for purposes other than intended.

4. All keys issued are the property of the University and must be surrendered to the WKU Police department or an Authorized Agent upon separation from WKU.  All keys should be returned in person to the WKU Police Department.  Do not return keys through campus mail.  In special circumstances, keys may be surrendered to an Authorized Agent.  An example of surrender of keys to an Authorized Agent would be an employee termination.

5. All keys must be returned to the WKU Police/Access Control Section when no longer needed for official business and never transferred from one individual to another.  The department an individual works for will be held liable for the costs of returning a building to a secure state if keys are not returned.

6. Building masters are only to be issued to those personnel who need access to all rooms controlled by that master key on a regular or frequent basis.

7. For security reasons the Chief of Police has the right to reject any key request.  The WKU Police/Access Control Section will notify the parties involved in the event a request is denied.

8. Employees of the WKU Police/Access Control Section will be subject to a criminal background investigation by WKU Police.

9. A computerized list of all keys issued to each department will be sent annually to department heads/administrators on October 1st for the purpose of a key audit.  Each department head will be responsible for insuring this audit is conducted accurately and returned to the WKU Police/Access Control Section by November 15th.

10. All building master keys shall be secured on campus prior to leaving at the end of each workday.

11. The WKU Police/Access Control Section, under the authority of this policy, is responsible for supplying keys, monitoring the issuing of keys, and providing key inventory reports according to University Policy.

12. The University project manager over the contractors/vendors/service personnel needing key access to a specific area will be the authorizing agent and will be responsible for seeing keys are returned within the time frame prearranged by the WKU Police/Access Control Section and the Project Manager.   PDC, IT, HRL, DFM, or WKUPD may act as the Authorizing Agent based on the needs of WKU.

13. The DFM Director is responsible for the assignment of keys to DFM employees to meet requirements throughout the campus.

14. Each building will have designated entrances for use "after normal business hours".  All other entrances should remain locked and **never** propped open.

15. Only one (1) key with the same function will be issued per person.

16. Assignment of keys to vendors, contractors, and service personnel will be by the same means as other staff, except that an officer or other signatory of the key holder's company will sign an appropriate form found on the WKU Police website http://www.wku.edu/accesscontrol/documents/contractor-agreement.pdf as designated by the WKU Police/Access Control Section making the firm responsible for the key, its use and care, and consequences of loss**.  This provision shall include but will not be limited to indemnification of the University for suits, thefts or other losses arising out of inappropriate use of the key, or the rekeying of all key cylinders operated by the key and any attorney's fees and related expenses incurred by the University.**

17. Key Storage: All keys not carried on a person must be stored in a locked key control cabinet approved by the WKU Police/Access Control Section Administrator.  Key control cabinets shall be equipped with numbered hooks only.  Key tags shall not indicate the lock(s) operated by the key nor shall any written record containing identification information be kept in the same cabinet as the keys.  High level master keys or keys to extremely high risk spaces shall not be maintained in these cabinets or stored elsewhere on the premises without special protections as directed by the WKU Police/Access Control Section   Administrator or Chief of Police.  Examples of locations that may have key storage include: PDC, IT, HRL, DFM, and WKUPD where cabinets are secured and require additional credentialing for access.

18. Keys shall not be duplicated.

19. Keys shall not be left in lock cylinders.  Once a door is opened, the key shall be removed from the key cylinder and re-secured by the key holder.

20. Keys shall not be hidden outside the area accessed by the key.

21. Keys shall remain in the key holder's possession at all times when on duty.

22. Except for those keys indicated as "checkout", **keys shall not be borrowed or loaned.**

23. Keys shall be returned upon separation from the institution.

24. Keys shall be used only for official duties.

25. Keys shall not be used to provide access to others unless authorized.

26. Keys will be subject to periodic audit by WKU Police/Access Control Section personnel under the direction of the WKU Police/Access Control Section Administrator or Chief of Police. The key holder is required to surrender any unauthorized  keys that operate University locks in his/her possession regardless of how the key was acquired (i.e., duplicated outside the University.) This is in addition to the annual departmental key audit.

27. Where the master key operates locks within more than one department, the key request must include approval from the authorized agent in all affected departments.  Exception: If the Vice President governing the area is the Authorizing Agent, no other signatures will be required. Building and department master keys will be subject to more frequent audit as ordered by the Chief of Police

28. No administrative head, department chair, or his/her designee is authorized to issue keys to spaces for which he or she does not have direct responsibility.

29. Keys are not to be obtained from a source other than the University.  If a key is discovered to have been transferred or duplicated from a source other than the WKU Police/Access Control Section, it is to be confiscated and the individual(s) involved reported through the WKU Police/Access Control Section Administrator to the Emergency Management Core Group for investigation.  Actions of this type constitute a violation of University policy.

30. Keys are not to be transferred from one individual to another.

31. All key issuance shall be conducted by the WKU Police Department, HRL, or approved campus extension site locations. The department administrator or Authorized Agent shall maintain all key/core transaction logs.  These records would include issuance logs with signatures and key marks and provide appropriate written records of transactions to auditors upon request.  Department Heads or Authorized Agents will at all times maintain an accurate accounting of keys as directed by this policy.  The keys issued to any department will be subject to audit at any time by the WKU Police/Access Control Section and/or WKU Police.

32. Keys to desks, cabinets, lockers, etc. are to be maintained by the department.  The WKU Police/Access Control Section will charge to cut keys for these departmental items.  You may contact the WKU Police/Access Control Section for a cost estimate.

33. Damaged or broken keys shall be returned to the WKU Police/Access Control Section for replacement.  Broken key parts should be taped together.  The number of this key will remain in the database.  A replacement charge will be issued to the individual or department requesting the replacement of a damaged or broken key.

34. Any University keys that are found are to be returned to the WKU Police/Access Control Section, WKU Police Department, or DUC Lost and Found.  The Night Lockup/Assistant Locksmith will be responsible for checking DUC Lost and Found for returned keys.

35. It is the responsibility of the Administrative/Department Head or Authorized Agent to ensure that keys are issued and returned based on the Key Policy and Procedures stated herein.

36. Reports of missing keys will be reviewed by the Emergency Management Core Group.  After review by the Emergency Management Core Group, the issuing department will be held liable for payment of replacement parts and labor necessary to place a building back into a secure state.

37. A Faculty/Staff member or student may be asked to surrender keys in their possession.

Following are examples of reasons for key surrender:

Faculty / Staff

- Termination of employment.

- Transfer to another department or building.

- Request of the administrative head, Department Chair, a WKU Police Officer, or Authorized Agent or designee.

Students

- When not enrolled or employed (including the summer term).

- Request of the Housing Director, a WKU Police officer, or Authorized Agent or designee.

38. The department which authorized the issuance of a key(s) to an individual that cannot produce the key(s) after being asked to surrender them will be charged for the loss as outlined on the Department Key/Core Cost Data and Examples page.

39. The WKU Police/Access Control Section will maintain a record of the missing key.

40. The WKU Police/Access Control Section Administrator will notify the Chief of Police of all missing keys.

41. For a student who does not return issued keys, in addition to the loss charges, a hold will be placed on the student's record that will preclude the student from obtaining an official transcript or receiving a degree.  Any holds on the student's transcript or degree will be removed once the issue is resolved.

**III. Procedure**

A.  Key requests

1. For obtaining a key: Refer to Table 1 **Access, Eligibility, and Approval Chart** for authorization guidelines.

2. The head of the administrative unit or department provides the WKU Police/Access Control Section with the names of the unit/department's Authorized Agent.  Each Vice President must also sign an Authorizing Agent form.  The form can be obtained at the following link: http://www.wku.edu/accesscontrol/documents/authorized-agent-form.pdf

3. Anytime there is a change in the Authorized Agent, the unit or department head must notify the WKU Police/Access Control Section by filling out a new Department Authorized Agent Notification Form.

4. To request a key, the Authorized Agent submits a signed copy of the key request to The WKU Police/Access Control Section.  If the signature on the form is missing or not an Authorized Agent, the WKU Police/Access Control Section will attempt to contact the Authorized Agent or designee to obtain the needed signature.  The forms are found at: www.wku.edu/Dept/Support/FacMgt/keyrequests.htm

5. All requests will be verified by the WKU Police/Access Control Section.

6. The WKU Police/Access Control Section will contact the department Authorized Agent and/or the individual to whom the key(s) were requested for when the key(s) are ready to be picked up.

7. All keys can be picked up at the WKU Police Department during normal business hours, which are 8:00 am to 4:00 pm Monday through Friday.  The WKU Police/Access Control Section is located in the Public Safety Building under PS1.  A valid WKU or government ID must be presented before the key is issued.

8. Key(s) must be signed for by the individual making the request.  All persons receiving a key will sign an agreement at the time of key pickup that specifies use and care rules.

9. To return a key: When the assigned key(s) are no longer needed the person to whom the keys are issued should return them to The WKU Police/Access Control Section.  In special

cases, an Authorized Agent may obtain the keys from the individual or their family and return them to the WKU Police/Access Control Section.

10. To request maintenance: submit a work order through DFM, who will forward the work order to the WKU Police/Access Control Section. Any out of town travel, such as to an extended campus site, will be billed to the requesting department.

11. To request a cost estimate: contact the WKU Police/Access Control Section Administrator at **270-745-5050.**

12. Eligibility and Approval: (Table 1) Indicates, by keying level, who may receive a key and who may authorize such keys. This table is intended to provide general direction as there may be special circumstances not covered. Special Circumstances will be directed to the WKU Police/Access Control Section Administrator who, after consulting with the Chief of Police, will approve or deny these requests. To receive a key, the key holder must qualify under the table below *AND* must also have a demonstrable need for the access level assigned by this table.

| (Table 1) Keying Level | Access Level | Eligibility to Carry and/or Check Out | Authority to Issue |
|---|---|---|---|
| Exterior Door Key | Designed to operate exterior doors only | Faculty, staff, or students | Approval from Dean or Department Head or designee |
| Office, Room, or single location Key | Will operate a single door | Faculty, staff, or students | Approval from Dean or Department Head or designee |
| Classroom and Labs | Ability to operate multiple rooms keyed alike | Faculty, staff, or students | Approval from Dean or Department Head or designee |
| Restricted Access Areas | Will operate doors that have been designated as high risk areas. This may involve high valued items; biohazards; weapons storage; radiation or chemical storage; other restricted research facilities. | As permitted by the person responsible for the area or process | Department Dean; Director of Housing; Chief of Police, Director of PDC, or Director of Athletics. |
| Department Master | Will operate a given group of locks within a building and/or department | Department Heads and Building Management Personnel for those areas under their jurisdiction and those designated by the Department Head | Vice President of the governing area ; Chief of Police; Director of Housing; Department Dean; or Director of Athletics. |

| Building Master | Will operate all locations within a given building except mechanical and IT rooms. | Dept. Heads and Building Mgt. personnel for those areas under their jurisdiction and those designated by the Dept. Head | Vice President of the governing area; Director of Housing; or Chief of Police |
|---|---|---|---|

B. Checkout keys

**Note: Checkout keys are issued for a specific non regular/infrequent need and are for a short time increment such as a day.**

1. Checkout keys shall be located in a secured container at all times prior to check out.  The areas where these containers contain keys for housing rooms, housing area masters, and higher key levels for checkout purposes shall be staffed 24/7 or shall be alarmed.

2. The checkout process shall include a method to ensure the key holder is authorized; that the check out process is documented (time out, time in, key set checked out) and that keys are properly inventoried.

3. Key sets (multiple keys on a ring) shall be provided on a sealed key ring as directed by the WKU Police/Access Control Section.  Keys so issued shall not be removed from this key ring. Checkout keys for residence hall rooms will be handled according to the housing agreement terms and conditions.

4. Checkout keys are subject to audit as ordered by the WKU Police/Access Control Section Administrator or the Chief of Police.

5. WKU Police, DFM, IT, PDC, and HRL are the authorized locations on campus for Checkout Keys.   Elizabethtown Radcliff/Ft. Knox, Glasgow, Owensboro and South Campus are the approved campus extension site locations for Checkout Keys.

6. Any department head or administrator requesting Checkout Keys to be maintained in their department must submit the request in writing to the WKU Police/Access Control Section.  The Chief of Police will approve or deny these requests.

7. For contractors, venders and service persons: Individuals authorized to receive a checkout key shall be listed by the employing department or firm by name and contact information provided to the WKU Police/Access Control Section.  A key request form http://www.wku.edu/accesscontrol/documents/key-request.pdf shall be filled out and signed by the authorized Contractor/Vendor/Service Agent.  This list will be maintained by the WKU Police/Access Control Section.  Checkout keys not obtained from PDC may be picked up at the WKU Police/Access Control Section.  A vendor, contractor, business will be liable for compensatory damages/loss incurred by Western Kentucky University due to the loss or misuse of keys issued to their Authorized Agent.

8. The following procedures will be followed for obtaining checkout keys from the WKU Police/Access Control Section:

a. Prior to the checkout event, the key rings will be inventoried and counted to verify all keys are present.  The keys will be verified by the person signing for the keys.

b. A valid WKU or government ID must be presented before the key(s) are issued.  The name(s) will be verified according to the Key Request Form.

c. Times of check out/in shall be recorded.  Key(s) checked out/in shall be recorded.

d. All checkout keys shall be returned at day's (or end of shift) end except where keys are checked out for a longer term through special arrangement.

e. The record of these transactions will be maintained by the WKU Police/Access Control Section.

C. Lockout

1. Building Services Attendants will unlock a building during normal business hours (typically 8:00 to 4:30 Monday through Friday) to provide access for an individual who has been locked out.  The department an individual works for will be responsible for room unlocks or lockout during regular business hours.  The Night Lockup person will be responsible for the evening lock-down of their assigned building.

2. Personnel from the WKU Police/Access Control Section are available to provide access for individuals who have been locked out without charge Monday-Friday from 8:00 am until 12:00 pm midnight.  If however, personnel must be called in anytime on weekends or after 12:00 pm M-F, an overtime/call-in charge will be billed to the department.  Current personnel policy requires us to pay a minimum of four (4) hours overtime pay for a call-in regardless of the time it takes to address the problem.  To avoid this charge, it is recommended that each department head have a lock-out plan which includes departmental on-call contacts or building coordinators.

3. Each department is responsible for establishing a procedure and identifying an individual to contact in the event of a lockout.  **The Authorization Form shall be on file.**

4. In the event of a lockout, the individual seeking entrance must show a valid WKU ID to the WKU Police/Access Control Section employee who will then call the employee's department Authorized Agent or designee (day or night) for authorization before the locked out individual will be allowed to enter the space.  WKU Police/Access Control Section employees are authorized to make exceptions to this requirement based upon the circumstances of the lockout.

5. HRL will handle lockouts per their policy.

D. Lost/Stolen Keys

1. The department Authorized Agent or designee, WKU Police and the WKU Police/Access Control Section should be notified immediately of lost/stolen keys using a lost key form. http://www.wku.edu/accesscontrol/documents/lost-key-sr.pdf.  This will result in a risk evaluation which may or may not require the affected locks to be rekeyed.  This decision will be based on an assessment of the type of key and the circumstances of the loss.  If, as a result of lost or stolen keys, re-keying locks is determined to be necessary **the unit or department will be responsible for all costs to restore pre-event security status as determined by the**

**Emergency Management Core Group.** If the keys were the specific object of a theft or robbery, special consideration may be given.

2. The WKU Police Department should be notified immediately of any lost or stolen keys by calling **270-745-2548.** The WKU Police Department will dispatch a police officer to complete a report. **No new keys will be issued until a police report has been completed.**

3. Keys lost to residential room doors will be rekeyed regardless of the loss circumstances. Housing policy will dictate any costs passed to the resident.
4. All reports of key loss will be reviewed by the Emergency Management Core Group. The committee will determine the potential impact on building security and create a financial impact report submitted to the Vice President of Student Affairs.

5. Decisions as to rekeying non-residential facilities will be made on a case by case basis with due consideration of the potential impact on security by the Emergency Management Core Group. A key loss will result in at least one of the following decisions:

    a.  No rekeying will be required.

    b.  The change key level will be changed (i.e., mandatory in residential room doors).

    c.  Rekeying will be partially required (i.e., exterior doors where an area master is lost, or rekeying of only the high risk spaces within a building where the building master key was lost).

    d.  Complete rekeying will be required (i.e., all doors affected will be rekeyed).

    e.  Rekeying will take place, but on a phased basis (i.e., exterior doors first, followed by high risk spaces, then other offices).

    f.  Whatever the decision, the process, along with the decision made, will be documented.

## Appendices

- Department Key/Core Cost Data and Examples

- Key Request Form.
  http://www.wku.edu/accesscontrol/documents/key-request.pdf

- Lost Key Form.
  http://www.wku.edu/accesscontrol/documents/lost-key-sr.pdf

- Contractor/Vendor Key Agreement Form.
  http://www.wku.edu/accesscontrol/documents/contractor-agreement.pdf

- Department Authorized Agent Notification Form
  http://www.wku.edu/accesscontrol/documents/authorized-agent-form.pdf

## Department Key/Core Cost Data and Examples

*Note: All costs are based on prices at the time of document inception and are subject to change without prior notification. Total impact costs are determined by the Risk Assessment Committee as defined in the policy.*

<u>BEST Access Systems</u>
    Cores Combinated & Stamped    $30.00
    Keys Cut & Stamped         $5.00

<u>Medeco</u>
    Cores Combinated & Stamped    $30.00
    Keys Cut & Stamped       $10.00

Labor Rate, Regular Time - $25.00
Labor Rate, Overtime - $40.00

Mileage reimbursement - .42 per mile to cover vehicle maintenance costs