POLICY & PROCEDURE DOCUMENT

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DIVISION: Enrollment and Student Experience
              Campus Services and Facilities

TITLE: Key Control Policy and Procedures

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I. Purpose and Scope

The WKU Police Department provides key and lock services through the WKU Access Control department for campus buildings under the direction of the Vice President of Enrollment and Student Experience. All persons using University keys, whether assigned or on a checkout basis, shall subscribe to this policy:

II. Policy

A. Definitions

    1. *Authorized Agent*: The individual designated by the administrative or department head is responsible for the request, control, and return of keys for a unit or department. It is the responsibility of the Administrator, Department Head, or Authorized Agent to ensure that keys are issued and returned based on the Key Policy and Procedures.

    2. *Authorization Form*: This form must be on file in the WKU Access Control department before keys can be issued. The form identifies authorized agents for each department if it is someone other than the administrative or department head responsible for the request, 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: Chief of Police or designee, 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 Academics, Access Control, the Athletics Department, Faculty, Housing, and Department of Facilities Management.

4. _Key Request_: The Department Authorized Agent may utilize Simple K Online forms to submit Key Requests. Simple K online is located in the WKU Access Control "Online Forms" tab on the website. Please contact WKU Access Control Administrator for assistance in setting up your account.

Paper forms are available on the Access Control website, but electronic submissions are preferred to ensure accurate and prompt service.   If necessary, please scan the paper form and email to accesscontrol@wku.edu.

Note: The WKU Access Control Department may verify any key request with Department head or Authorized Agent of the requesting department.

Key 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; email address, building, and room number.

   d. The specific key holder or designated secure key ring that will receive the new key;

   e. The specific key(s) that are being requested; keys must be identified on the request form by door number or core mark;

   f. The index account number to be charged for the key(s);

   g. 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 (Simple K) 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.

7_. Key System Master_: Any top level key capable of operating multiple cores within the same key system codes. This includes the following common key terms: Great Grand Master, Grand Master, Master, Building Master, and all variations of key system Sub-Masters.

B. <u>Key Inventory Control, Replacement and Recovery:</u>

1. In addition to WKU Human Resource employment requirements, employees of the WKU Access Control Department must pass a criminal background investigation by WKU Police and adhere to the WKU Police Code of Conduct.

2. Key records are maintained by WKU Access Control on an electronic database. This database records events for all WKU key systems, assigned building, associated cores, and the status of each key. Keys are individually serial numbered and blind coded.

3. Each building will have designated entrances for use "after normal business hours". All other entrances should remain latched and locked according to normal building operation hours.

4. Keys are issued for the purpose of conducting University business only. Key holders are not permitted to utilize keys in any manner other than authorized by this policy.

5. Faculty, staff, and students are issued keys upon the written authorization of a WKU appointed administrative head, dean, departmental chair or his/her designee. Departments need to utilize the Authorized Agent Form to notify the WKU Access Control department when a designee is appointed or authorization is withdrawn.

   The Authorized Agent form is located on the WKU Access Control website: http://www.wku.edu/accesscontrol/documents/authorized-agent-form.pdf

6. Keys are issued based on the key holder's need to access areas for regular work assignments. Matters of convenience are not considered valid reasons for issuance of keys.

7. The Administrative head, department chair, or his/her designee is only authorized to order keys for doors within their assigned spaces.

8. Key holders are not permitted to loan, borrow, and trade keys. All key / core transfers must be coordinated through the Access Control department.

9. Only one key with the same core function will be issued per authorized key holder.

10. Key System masters are only issued to secured key rings that will remain in locked cabinets on campus when the authorized key holder is not working on campus. Key rings are only assigned to personnel who need access to all rooms controlled by that master key on a frequent basis during their regular work hours.

11. Key System master requests 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 or Access Control Administrator.

12. The Chief of Police or Access Control Administrator retains the authority to deny any key request if granting the request would compromise security of the key system or building.

The WKU Access Control Department will notify the parties involved in the event a request is denied.

13. All keys issued are the property of the University and must be surrendered to the WKU Access Control Department or an Authorized Agent upon separation from WKU or upon request.

   Key Holders must return all keys in person to Access Control. In special circumstances, keys may be surrendered to an Authorized Agent and the agent may return the keys to WKU Access Control. Contact WKU Access Control administrator for procedure and approval of alternate procedure.

14. If keys are not returned to WKU Access Control, the department who requested the key for the key holder (Faculty, Staff or Student) is liable for the costs of returning a building to a secure state. This includes all cost for replacement cores, issuing new associated key duplicates, and lock smith labor. The cost for labor, materials, and new keys is not refundable if the keys are returned after the work order is closed. *Also see Section C. Special Key Considerations, item 6.*

15. Key holder inventories are completed by the WKU Access Control Department as new keys are assigned. Key holders must present all assigned keys or file the appropriate missing / lost / stolen key reports before receiving new keys.

16. Periodic key audits may be conducted by WKU Access Control personnel under the following conditions: random key control inventory; or when circumstances indicate a security breach due to policy deviations; or by written request from the College and/or Department Administration. These key audits are under the direction of the Chief of Police and/or the WKU Access Control Administrator.

17. The WKU Access Control department, under the authority of this policy, is responsible for supplying keys / cores, monitoring the issuing of keys / cores and providing key / core inventory records to authorized personnel. Individual key inventory records are not distributed due to security risk associated with publicizing known key codes with linked key holders, buildings, and cores.

18. Any WKU Department project manager assigned authority over contractors / vendors / service personnel needing key access to a specific area will be the authorizing agent and is responsible for ensuring keys are returned within the time frame prearranged by the WKU Access Control Department and the Project Manager. PDC, ITS, HRL, DFM, or WKUPD may act as the Authorizing Agent based on the needs of WKU.

19. 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 Access Control website. This agreement form as designated by the WKU Access Control department holds 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.

20. The DFM Director is responsible for the assignment of keys to DFM employees to meet requirements throughout the campus. The DFM Director will ensure all key system masters are secured on tamper proof key rings and stored in locked key cabinets when not in use.

21. Key Storage: All keys not carried on a person must be stored in a locked key control cabinet approved by the WKU Access Control 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 key system masters or keys to identified high risk spaces shall not be maintained in these cabinets or stored elsewhere on the premises without special protections as directed by the WKU Access Control Administrator or Chief of Police. Examples of locations that may have key storage include: PDC, ITS, HRL, DFM, and WKUPD where cabinets are secured and require additional credentialing for access.

22. Key holder responsibilities:

    a. Keys may not be duplicated by any person not employed by WKU Access Control. The key holder is required to surrender any unauthorized WKU keys in his/her possession regardless of how the key was acquired. Unauthorized key possession incidents may be investigated by WKU Access Control and the findings reported to the Emergency Management Core Group.

    b. Key holders will not leave keys unattended: Keys are very valuable in terms of cost to replace cores and duplicate keys when they are lost or stolen. Never leave keys unattended, hidden outside of doors, or hanging in the door lock.

    c. Keys are assigned by unique serial numbers. Return keys to WKU Access Control and sign for their removal from your inventory. Do not loan your keys to fellow employees or leave with another employee when transitioning to another work assignment or upon separation from the university. Key holder responsibility can only be transferred by WKU Access Control office.

    d. Only use your keys for official duties. Do not unlock doors for unauthorized personnel or loan out your keys for access to building spaces.

C. Special Key Considerations:

1. All key issuance shall be conducted by the WKU Access Control Department, Housing Residents Life, or approved campus extension site locations. The department administrator or Authorized Agent shall maintain all key/core transaction logs in these special circumstances. 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 same requirements to comply with key return and key audits apply.

2. Keys for desks, cabinets, lockers, fleet vehicles, and other non WKU Interchangeable Core Key Systems are no longer maintained by Access Control. The WKU Access Control Department does have a small inventory of miscellaneous office furniture keys

that are available. Contact the WKU Access Control department for availability and cost estimate.

3. Return all parts of damaged or broken keys to the WKU Access Control department for replacement. A replacement charge will apply if the damage is due to negligence or misuse.

4. Return "Lost & Found" keys to the WKU Police Department, Access Control Department, or DSU Lost and Found. The Night Lockup/Assistant Locksmith will be responsible for checking DSU Lost and Found for returned keys.

5. Report missing, lost, or stolen keys immediately to WKU Access Control. The Lost / Stolen key report is available on the Access Control website. Bring completed form to Access Control to file the report and complete the required WKU Police incident report. Lost key reports and police reports are reviewed by the Emergency Management Core Group. The Emergency Management Core Group will determine the course of action necessary to restore key system security.

6. The department which authorized the issuance of a key(s) to a key holder (Faculty, Staff, or Student) that fails to return key(s) or otherwise cannot produce the missing or lost key(s) is responsible for all associated cost to re-core. Estimated cost of re-coring is outlined on the Department Key/Core Cost Data and Examples page at the end of this policy. *Also see Section B. Key Inventory Control, Replacement and Recovery, Item 14.*

7. The WKU Access Control Department will maintain a record of the missing keys and notify the Chief of Police when missing key reports are filed.

8. Surrendering WKU issued keys: Based on the security needs of WKU, key holders may be asked to surrender keys in their possession for inspection and/or involuntary return: 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, an Authorized Agent, or his/her designee.

III. Procedure

 A. Key Requests:

   1. Key Authorization Guidelines:

The following matrix indicates who may receive a key and who may authorize keys. This table is intended to provide general direction as there may be special circumstances not covered. Direct questions not covered by the matrix to the WKU Access Control Department Administrator. 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	Eligible Key Holder	Authority to Issue
Exterior Door Key	Designed to operate exterior doors only	Faculty, staff, or Limited 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 ITS 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

2. The head of the administrative unit or department provides the WKU Access Control department with the names of the unit/department's Authorized Agent. Each Vice President also signs an Authorizing Agent form. The form is available on the Access Control website.

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

4. To request a key, the Authorized Agent submits an electronic key request to The WKU Access Control Department. Contact WKU Access Control to set up an online account. Paper forms may be faxed if the electronic version is not available online. All requests will be verified by the WKU Access Control Department.

5. The WKU Access Control Department will contact the Authorized Agent or the requested key holder when the key(s) are ready.

6. Keys can be picked up at the WKU Access Control Department during normal business hours posted on the Access Control website. The WKU Access Control Department is located in Annex II under PS1. Temporary parking is available for customers. Key holders must bring a valid photo ID and all currently assigned keys for the inventory inspection.

7. The authorized key holder must personally sign for the key. Keys may not be picked up by a second party. Key holders will sign the key agreement form affirming they understand the cost of replacement and return policy.

8. To request maintenance: submit a work order through the WKU Access Control website, Online Forms, Simple K Online. Any out of town travel, such as to an extended campus site, will be billed to the requesting department.

9. To request a cost estimate: contact the WKU Access Control at **270-745-5050.**

B. Checkout keys

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

1. Any department head or administrator requesting Checkout Keys to be maintained in their department must submit the request in writing to the WKU Access Control department. Departments will need approval from the WKU Access Control Administrator before installing mechanical or electronically secured key boxes.

2. Checkout keys shall be located in secure locking devices at all times prior to check out. The following are permitted types of keys for these storage devices: special circumstances for unique building spaces, keys for housing rooms, housing area masters, and higher key levels for checkout purposes by university facilities faculty and staff. Checkout devices must be auditable, alarmed, or their location staffed 24/7.

3. WKU Access Control, DRM, HRL, ITS, PDC, and WKU Police are the authorized locations on campus for checkout keys. The following sites are also approved locations on WKU extended campuses: Elizabethtown, Radcliff/Ft. Knox, Glasgow, Owensboro, and South Campus.

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

5. Key sets (multiple keys on a ring) shall be provided on a sealed key ring as directed by the WKU Access Control department. Keys issued to sealed rings shall not be removed from the key ring without authorization from WKU Access Control. Checkout keys for residence hall rooms will be handled according to the housing agreement terms and conditions.

6. Checkout keys are subject to audit as ordered by University / College Administrator, Department Head, WKU Access Control Administrator, or the Chief of Police.

7. Contractors, vendors 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 Access Control department.

   If keys need to be ordered for checkout; the Project Manager will submit a key request form online. The contractor will sign the user agreement form while picking up the key at WKU Access Control. Contractor checkout lists and contractor agreement forms will be maintained by the authorized department or WKU Access Control. 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 Access Control department:

   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 Access Control or the authorized department.

C. Lockout

1. Building Service Attendants unlock the exterior doors on weekdays for regularly scheduled classes. The department an individual works for or the building coordinator is responsible to assist faculty and staff with lockouts during regular business hours (8:00 a.m. till 4:30 p.m.). The WKU Access Control night lockup staff member is responsible for the evening lockup of their assigned building.

2. Generally, the employee should first contact his/her department office or the building coordinator when he/she is locked out of an area. Personnel from the WKU Access Control department are available to assist with lockouts Monday-Friday from 8:00 a.m. until 11:30 p.m. If however, personnel must be called in after normal work hours or on weekends, an overtime/call-in charge will be billed to the department. Current overtime payment policy requires a four (4) hour minimum payment for callouts regardless of the time it takes to address the problem.

3. It is recommended that each department head implement a lockout response plan which includes departmental on-call contacts or building coordinators. Each department is responsible for establishing a procedure and identifying an individual for employees to contact in the event of a lockout or making arrangement for weekend events.

4. In the event WKU Police or WKU Access Control respond to assist with a lockout, the individual seeking entrance must show a valid WKU ID to the WKU Police Officer or WKU Access Control 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 Access Control department 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 Access Control Department should be notified immediately when keys are missing, lost, or stolen. Key incidents are documented by filing the WKU Access Control "Lost Key" form and by filing a WKU Police Incident report. These reports will be utilized by the Emergency Management Core (EMC) committee to complete a security risk evaluation. The EMC committee 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 committee. 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 committee. The committee will determine the potential impact on building security and create a financial impact report submitted to the Vice President of Enrollment and Student Experience.

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 committee. A key loss will result in at least one of the following decisions:

   a. No rekeying will be required.

   b. The change key/operator key will be rekeyed (i.e., mandatory for all 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.

Re-Core Estimated Charges for Lost or Missing Keys:

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.

BEST Access Systems
Cores pinned and stamped $35.00	X total number of duplicate cores	= _____
Keys cut and stamped $10.00	X total number of duplicate keys issued	= _____

Medeco
Cores pinned and stamped $35.00	X total number of duplicate cores	= _____
Keys cut and stamped $10.00	X total number of duplicate keys issued	= _____

Labor Cost
Labor Rate, Regular Time - $25.00	X total hours	= _____
Labor Rate, Overtime - $40.00	X total applicable hours	= _____
	Total Cost for Re-Core	= _____

Mileage reimbursement – Approved WKU travel rate per mile for extended campus

V. Reason for Revision

Policy revised for procedural clarity, format, grammar, and policy modifications since original approval.

VI. Appendices

The following documents may be found on the WKU Access Control Website under the "Online Forms" tab:

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