



05.120

## KEY CONTROL

<b>Authority:</b>	Vice Chancellor Business Affairs
<b>History:</b>	Updated July 2019; Updated October 2015; Updated October 2009; Updated June 2004; Effective February 15, 1991; supersedes former Policy No. PHY 1.10
<b>Source of Authority:</b>	UNC Code Section 502
<b>Related Links:</b>	<a href="#">Key Request Form</a> , <a href="#">Lost, Stolen, or Unreturned Keys Form</a> ; <a href="#">Key Tracking Log</a>
<b>Responsible Office:</b>	Physical Plant

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### I. Purpose

This policy provides guidance and procedures for the control of keys to promote the safety and security of the University community and its property.

### II. Scope

This policy applies to all UNCW departments.

### III. Policy

#### A. Definitions

1. Level 1 (Grand Master individual key or secure ring of Grand Masters): a key that operates multiple locks in multiple buildings
  - a. **Issuance requires;** the approval of the department Head, Dean or Division AVC, Division VC, Facilities AVC and Physical Plant Director.
    - i. **Restricted Issuance of these keys to the following:** UPD and approved employees within Facilities, EHS and IT.
  - b. When in use, these keys must be attached to the person via a belt clip or equivalent.
  - c. When not in use, these keys must be secured in sequence lock provided by UNCW.

2. Level 2 (Master Key): Typically keys for master suites used by more than one department, buildings masters and exterior doors.
  - a. **Issuance requires:** the approval of the department head, Dean or division AVC and the Physical Plant Director.
3. Level 3 (Operating key): Typically keys for office doors, work areas or suites.
  - a. **Issuance requires:** the approval of the department head.
4. Incidental Keys: Keys specific to an individual's work space, e.g., file cabinet keys, desk keys, safes, etc. Incidental keys are not controlled or documented by Locksmith Services.
5. Operating Keys: Keys that operate one particular lock.
6. Secure location: A secure location is a sequence lock, or a locked container stored in an office that is locked after business hours. Examples include a locked metal box stored inside a locked office, or a lockable file cabinet inside a locked office.

## *B. Responsibilities*

### 1. Department Heads

Department Heads are ultimately responsible for the control of keys issued to personnel in their departments. This includes:

- a. Tracking and documenting key issuances, returns, and custody transfers
- b. Documenting and reporting all instances of lost or stolen keys
- c. Supervising periodic key audits.
- d. In the case of a [lost key](#), review lost key reports, and in conjunction with UPD, determine if a rekey of the affected area is required.

The Department Head may assign some of these duties to the Designated Key Control (DKC) person as described in Section B.3. The Department Head will also verify that Locksmith Services is notified when there is a change in the assigned DKC.

## 2. Locksmith Services Shop

- a. Cut and issue keys in accordance with properly approved [Key Request Forms](#).
- b. Maintain current and accurate records of all Level 1, 2, and 3 keys and locks at UNCW.
- c. Create and maintain a keying system that provides security and reasonable access to departments occupying campus facilities.
- d. Maintain a secure file area accessible only to Locksmith Services personnel for original keys furnished with all new buildings, additions, or renovations.
- e. Conduct and support key audits; issue periodic reports as required.
- f. Perform all maintenance and repair of locking systems (except for card access control systems).
- g. Provide advice and counsel regarding the potential ramifications of lost or stolen keys and decisions to rekey.

## 3. Designated Key Control Persons (DKCs)

Each Department Head shall assign an individual to be the department's Designated Key Control person (DKC). Responsibilities include:

- a. The DKC will administer the department's key control program by preparing key related forms, issuing, tracking, transferring, and retrieving keys, reporting lost or stolen keys, and performing periodic audits of the department's key control program.
- b. The DKC's shall keep Locksmith Services apprised of permanent key transfers within their respective departments and shall advise Locksmith Services of any change in the assignment of DKC responsibilities.
- c. If the DKC is assigned keys or is responsible for departmental keys for temporary use by others, these keys must be kept in a secure location when not in use.

4. Physical Plant Work Control Administration
  - a. Physical Plant Work Control Administration (WCA) is responsible for preparing key- related Work Requests for Locksmith Services. The Work Order Desk will contact DKCs when keys are ready for pick-up, and will accept returned keys from DKCs or individuals.
  - b. Manage the assignment of keys for daily use by employees and approved contractors via the KeyTrak® key distribution system (see H below).
5. Physical Plant Director. Responsibilities include:
  - a. Approve the Key Control Policy, and make changes to the procedure in the future as needed.
  - b. Screening Key Level 1 and 3 Requests; the Director's approval of these requests must be noted on the Key Request/Return Form as a prerequisite to Work Control Administration completing a Work Request to Locksmith Services.
  - c. In the case of a lost key; review lost key reports, and in conjunction with UPD and the affected Department Head, determine if a rekey of the affected area is required. Physical Plant Director has final decision making authority in determining if a rekey is needed. The Department, whose employee lost the key, will be responsible for the cost associated with the rekey.
6. Individual Key Holders. Responsibilities include:
  - a. Safeguard the keys assigned to them from theft, loss, or unauthorized use.
  - b. Promptly report theft, loss or unauthorized use of those keys to the Department DKC and UPD.
7. Individuals with Grand Master Keys. Responsibilities include:
  - a. Keys must be locked in a secure location when not in use and at the end of each work day.
  - b. Keys are not to be taken off-campus, unless campus business is being conducted (example: CMS, etc.)
  - c. When in use, keys must be attached to the user (belt hook, wrist strap, etc.).

### *C. Key Basics*

1. All UNCW employees will be assured access to their workspace. In most cases keys will be issued directly to employees. As key holders, individuals will assume responsibility for the safekeeping and eventual return of university keys.
2. Keys will not be issued by Locksmith Services directly to students or student employees. However, Department Heads may authorize temporary key access to students or student employees within a department and will assume responsibility for control and use of the keys.
3. Department Heads/DKC are responsible to ensure that keys are returned by their employees upon transfer or termination of employment with the university or when the need for the key no longer exists. Department Heads/DKC are also responsible for notifying Locksmith Services to enable a record update.
4. [Lost, stolen, or unreturned keys](#) will not be replaced until a report has been filed with University Police and a Lost, Stolen or Unreturned Form is on file with Locksmith Services. If replacement keys are required, a copy of the Police report must accompany an approved [Key Request Form](#).
5. Keys will be issued and access granted for the duration of the need, not by term of employment with the University.
6. Key identification will be inscribed on the key by the locksmith shop. No other identification may be added to the key by others.

### *D. Key Forms*

1. [Key Request Form](#) – available on the [Physical Plant](#) web site and used to request keys from Locksmith Services.
2. [Key Return Form](#) – available on the [U-Business](#) or Physical Plant web site and used to return keys to Locksmith Services.
3. [Lost, Stolen, or Unreturned Key Form](#) - available on the U-Business or Physical Plant web site and used to report lost, stolen, or unreturned keys to Locksmith Services.
4. [Key Tracking Log](#) – used by Designated Key Control persons to track keys within their respective departments. Available on the Physical Plant web site.

*D. Key Forms, Continued.*

5. Key Audit Letter – prepared by Locksmith Services and issued to departments to initiate the biennial key audit.

*E. Key Transfers*

Transferring Level 1 and Level 2 keys directly from one person to another is not permitted. Transferring Level 3 keys from one person to another person is permitted and must be logged into Keystone by the DKC.

*F. Key Tracking Records*

DKC's are responsible for keeping accurate and up-to-date key records including the loss, theft and transfer of all keys.

*G. Broken or Damaged Keys*

If a key is broken, damaged, or otherwise defective, the key (or pieces) must be returned to Work Control Administration (WCA). WCA will arrange for a replacement key from Locksmith Services. There is no charge for replacing a broken, damaged, or defective key.

*H. Temporary Access – Contractors, Vendors & Other Non-University Personnel*

1. UNCW employees, contractors, vendors, and other non-university personnel who require key access to University facilities may check out keys from Work Control Administration via KeyTrac®.
2. Keys must be returned at the end of the work day. A drop box is provided at the Facilities Administration front door for after-hours return of keys. Non-university employees who request keys in this manner must first be approved by a Facilities Director.
3. For longer term projects where key access is desired for non-university personnel working with Facilities, the responsible project manager (PM) may submit a [Key Request Form](#) for the requisite keys. The PM will be responsible to ensure keys issued to non-university personnel are used appropriately and are returned promptly when the need for the keys no longer exists.
4. For longer term key access for non-university personnel working with other departments, the departments Dean, Director or higher level employee must fill out the key request form and the UNCW [Sponsor Form](#) for the requisite keys. The Dean, Director or higher level employee will be responsible to ensure keys issued to non-university personnel are used appropriately and are returned promptly when the non-university personnel is no longer employed or the need for keys no longer exists.

*I. Key Audits*

1. Biennially (every two years), Locksmith Services will initiate a Key Audit by

initiating a key audit letter. The Department will verify possession of the keys and provide Locksmith Services with written verification of its key inventory within 30 days of receipt of the Audit notice.

2. Any discrepancies between Locksmith Services records and actual inventory will be reviewed and reconciled by the responsible DKC individual and Locksmith Services. No additional keys will be issued to a Department if its Audit results have not been received by Locksmith Services within the 30 days allotted for the audit.

#### *J. Key Tracking Log*

1. Department Heads/DKC's are responsible to ensure that a log is maintained to track all keys issued to the department and the individuals assigned specified keys by the department's DKC. Copies of [Key Tracking Logs](#) will be requested by Locksmith Services on a periodic basis and concurrently with the biennial key audit.

#### *K. Securing Keys*

- a. All keys not issued to a specific employee must be appropriately secured in a locked cabinet or safe to be provided by the department; under the control of the DKC.
- b. Keys should be returned to the Physical Plant Locksmith if they will not be used for an extended period of time.

#### *L. Key Duplication*

- a. Key holders shall not duplicate keys issued to them. Additional keys must be requested utilizing the UNCW [Key Request form](#).

### **IV. Procedure**

#### *A. Key Issuance*

1. Requests for keys must be submitted to the Physical Plant Locksmith Services Shop (via fax to extension 22637) using the [Key Request Form](#) available from the Physical Plant web site. Locksmith Services will review the Form, determine the Key Level(s) being requested, and ensure that the appropriate department level signature(s) have been provided. If appropriate signatures are missing the Form will be returned to the responsible DKC.
2. Key Request for Level 3 key requests, Locksmith Services will forward the Form directly to Work Control Administration. For Level 1 and Level 2 key requests, Locksmith Services will forward the Form to the Director of Physical Plant for review and approval. The Director will ensure that

requests for Level 1 and 2 keys have the appropriate approvals and that the request is consistent with the University's goals to provide employees ready access to work areas while, for security reasons, minimizing the number of Level 1 and Level 2 keys outstanding.

3. The Director of Physical Plant will forward approved Forms to Work Control Administration who will complete a Work Request to Locksmith Services.
4. Locksmith Services will fulfill the request and return the Form, with the keys, to Work Control Administration.
5. Work Control Administration will contact the DKC to arrange for key pick-up. The employee being assigned the key, the cognizant DKC, or a third party authorized by the DKC may pick up keys at the Work Control Administration. The DKC will identify the individual authorized to pick up the keys and this individual will be required to present identification (and identify the associated work order number) in order to receive the keys.
6. Locksmith Services will maintain employee key records in its database. The Shop will provide DKCs with reports of key records as requested and will work with DKCs to maintain the accuracy of these records as changes occur.
7. For short term or temporary access, (e.g., Housing, Dobo laboratories), departments may be issued multiple keys which must be retained in a secure location by the department when not assigned to individuals. Responsibility for these keys, as well as establishing sign-out and return procedures, remains with the Department Head or designee.
8. Keys should be picked up from Work Control Administration within 48 hours of the notification that they are available.

*B. Key Returns*

1. Department Heads notify DKC & Locksmith Services to enable a record update.
2. Level 1 (Grand Masters) must be returned to Locksmith Services via Physical Plant Work Control Administration accompanied by a [Key Return Form](#). The return must be in person (not via campus or other mail) by the Department Head, DKC, or designee.
3. Submit a [Key Return Form](#) for Level 2 and 3 keys that are no longer needed by the individual to whom they were assigned shall be returned to the issuing DKC in accordance with departmental policy.
4. Re-keying of a building or a group of rooms may result in employees being



required to exchange an old key for a new one. The responsible DKCs will be responsible for collecting the old keys after issuing new keys.

*C. Lost, Stolen, or Unreturned Keys*

1. Report [lost, stolen, or unreturned keys](#) immediately through the responsible Department Head to University Police and to Locksmith Services via the Lost, Stolen, or Unreturned Key Form.
2. Replacement keys will not be provided without a properly completed [Key Request Form](#) accompanied by a copy of the Police report.





*D.*