

Campus Master Key Control Policy

University of Wisconsin-Madison

Purpose

The purpose for this policy is the protection of the lives and property of the campus community. Maintaining accurate, effective access control for exterior and interior doors with mechanical keys is critical to protecting the campus. It is the policy of the University of Wisconsin-Madison to issue the lowest tier of key that will be effective for the type of access that is needed for any given application.

The hierarchy of the key structure on the University of Wisconsin-Madison Campus is as follows: Great Grand Master(GGM), Grand Master(GM), Master(M), Sub-Master(SM) and Change(C). These tiers assure that effective keys are issued while remaining cost effective.

This policy is in place to:

- ensure that people requesting keys actually are authorized to do so
- ensure an individual(s) requesting key(s) are receiving the correct tier of key
- ensure the lowest tier of key that is effective is provided to the requestor
- to ensure a process of accountability for the return of keys
- to resolve problems resulting from a lack of key control
- to ensure accountability when Departments have a key control breach
- to ensure compliance of Federal, State or other agencies guidelines

The policy is applicable to current and future University sites under the operational jurisdiction of the University of Wisconsin-Madison Police Department and Lockshop of the University of Wisconsin- Madison Physical Plant.

I. DESCRIPTION

Access Control on the Madison campus is divided into three categories:

- Non-Restricted Keyways
- High Security Keyways
- Card Access

Key control is necessary for all keys. However, master level keys (Great Grand Master, Grand Master, and Master keys) are the focus of the partnership between the Police Department, Lockshop, and users of keys.

II. DEFINITIONS

- A. ACCESS CONTROL - control of entry/exit to an area by any means (mechanical, electrical or wireless).
- B. KEY – any mechanical device used to operate a mechanically controlled mechanism for entry/exit to a controlled area.
- C. ACCESS CONTROL KEY – any device used to gain entry/exit to a controlled system (normally a mechanical key or a card key).
- D. DEAN/DIRECTOR - a dean of a school or college or a director of a division who typically reports to the chancellor or a vice chancellor.
- E. DEPARTMENT CHAIR/UNIT HEAD - a chair of an academic department or the head of a unit within a division.
- F. DEPARTMENT ACCESS KEY CONTROLLER- individual who manages the key control files.
- G. KEY CONTROL FILE – records maintained by the Facility Manager or Designee.
- H. MECHANICAL KEY SYSTEM – any mechanical device used to operate a mechanically controlled mechanism for entry/exit to a controlled area. These locks operate with the Building Master Key System.

III. RESPONSIBILITIES

Deans/Directors or designees of each school are responsible for the full implementation of this policy within their respective areas. All access control and key records are subject to audit by the Police Department.

- A. The Chief of Police has been designated as the overall authority and delegated the responsibility for key control implementation, policy and internal audits of key control. The Lieutenant of Infrastructure Security is appointed the Access Control Director.

B. The Access Control Director is responsible for the following items:

1. Ensures the Department Access Key Controller Completes and maintains a master key inventory process.
2. Directs Department Access Key Controller to conduct a key control record audit as needed.
3. Directs designated Police Department employees to audit Departmental mechanical and automated access control systems, and to assist Departments with maintaining effective key control.

C. The Physical Plant – Lock Shop Manager is responsible for creating a mechanical keying system that ensures security to departments occupying buildings or facilities and for coordinating new systems. Their duties include:

1. Maintaining the key control filing system and records regarding all key systems. These records are accessible to the UW Police Department.
2. Fabricate all keys. Physical Plant Lock Shop creates all original keys furnished under new building(s) or alterations.
3. Issues all mechanical access control keys to Department Access Key Controllers.
4. Conducts all maintenance and repair work regarding mechanical locking systems.
5. Consults with the Police Department's Access Control Director and UW-Madison Risk Management concerning high security keys that are lost or stolen. Decisions to re-key or to duplicate keys are based on consultation between the Police Department, the Facility Manager, the Supervisor of the Lockshop, the respective Dean or Department Chair or Director and UW-Madison Risk Management. All re-keying will be administered through the Physical Plant Lock Shop. The cost of re-keying and key cutting is borne by the affected Department.

D. The Dean/ Director:

1. Schools and Colleges at the University of Wisconsin-Madison vary widely in terms of departmental structure, numbers of buildings, etc. The Dean/Director or designee must determine the level of key control for their school, college or division that is appropriate for their unit. The Dean/Director or designee is responsible for advising the UW-Madison Police Department and UW-Madison Physical Plant Lock Shop of the individual(s) assigned the responsibility of Access Key Controller and their alternate(s). The Access Key Controller can be housed at the school/college/division level, the department/unit level or by building.
2. The notification should include the Access Key Controller's and alternate's work address, telephone number and signature (for future verifications). The Access Key Controller will oversee all aspects of key distribution to ensure key control integrity.

E. The Access Key Controller:

The office of a designated Access Key Controller should be secure and should have limited access by other personnel. This should not be a cubicle style office nor should the office have a door containing non reinforced glass.

The Access Key Controller is responsible for developing adherence to and implementing the following:

1. Report theft of keys to the University of Wisconsin-Madison Police Department immediately upon the discovery of theft.
2. Maintain accurate records of all keys provided and retain a key inventory.
3. Recover University keys from personnel, including students whose employment or appointment is terminated or transferred to another department.
4. Report any failure to recover high security keys to the University of Wisconsin-Madison Police Department Access Control Director.
5. Report loss of keys to the Physical Plant Lock Shop within 24 hours of the discovery of the loss.
6. Retain spare keys in an approved, recessed (if possible), tamper resistant lock box. (The Physical Plant Lockshop will provide specifications for approved lockboxes.)

7. Ensure that spare keys are not overtly labeled or identified indicating their access area.
8. Participate in key control record audits.

F. Compliance:

All University personnel are required to do the following: See Appendix A

1. Maintain, secure and be responsible for any key(s) issued.
2. For any theft or for loss of high Security Keys, the Access Key Controller will contact the University Police Department within 24 hours of the discovery of theft or loss. Report loss of keys to the Access Key Controller.
3. Return all keys issued to the Access Key Controller upon changing departments or terminating from the University.
4. Pursuant to university rules and policies, employees may be subject to disciplinary action up to an including dismissal for violations of this policy. The process and procedure for considering disciplinary action will follow the appropriate policies for each employment type.

IV. INSTALLATION AND ISSUANCE

A. Mechanical key systems

1. Requests – All requests for issuance of keys and re-keying shall be submitted to the Physical Plant Lock Shop by the Department Access Key Controller. The request shall be on a Physical Plant Service Request Form. The request form shall include justification for the key work and the lowest level of key needed. This minimizes the scope for re-keying in the event the keys are lost or stolen.
2. Safekeeping – The holder of a key to any university facility assumes responsibility for the safekeeping of the key and its use. The key will not be loaned or made available to others. When leaving a campus area(s) or building(s) ensure that all doors are secured as they were upon arrival.
3. Exception – the only exception to this section of procedures is for FP&M Project Managers securing keys for contractors working in unoccupied areas. In these cases, FP&M can request and receive keys directly from the lock shop. The lock shop will still maintain records and obtain signatures for these keys.

4. For keys to occupied areas, the FP&M Project Manager must contact the Access Key Controller.
5. Vendors, contractors and non-university personnel needing access to portions of university property (telephone service, elevator service, vending, etc.) are issued keys through the Physical Plant Lock Shop. Should the key be lost or not returned upon expiration of the period of usage, vendors, contractors and non-university personnel will be responsible for all re-keying costs to all affected facilities. Prior to keys being issued, vendors, contractors and non-university personnel are required to sign an agreement to pay all re-keying costs for areas affected by lost or non-returned keys.

B. HIGH SECURITY KEYING

1. Requests -- All requests for installation of special security locks shall be made via written service request, from the Dean/Director or designee to the Physical Plant Lock Shop.
 - a. Users of these locks are required to maintain a current list of the names of all persons who have been given a key.
 - b. An employee needing a key will complete and sign a Key Application Form for each key issued. This form shall then be signed by the Access Key Controller (or designee) and routed to the Physical Plant Lock Shop.
2. Safekeeping--Lost or stolen keys shall be immediately reported to the University of Wisconsin-Madison Police Department.

C. MASTER KEYS

1. Requests – All requests for keys shall be made via written or email service request from the Access Key Controller to the Physical Plant Lock Shop.
2. Requests for Master Keys, Grand Masters, and Great Grand Masters will be routed to the Supervisor of the Physical Plant Lockshop.
- 3.. Special Approval – Requests for Great Grand Masters will be reviewed by the University of Wisconsin-Madison Police Department Access Control Director in consultation with the Department Chair or Director and Supervisor of the Lock Shop to ensure the key requested is needed.

4. Routine Audit — Master, Grand Master (GM) and Great Grand Master key assignments will be reviewed by the Physical Plant Lockshop Supervisor and the UW Police Department Access Control Director or designee annually. The results of the audit will be forwarded to the Dean/Director or designee and the Chair/Unit Head or Department Chair or Director of the appropriate school or college.

Appendix A: University of Wisconsin Administrative Code

UWS 18.08

(6) PHYSICAL SECURITY COMPLIANCE.

- (a) No person may ignore, bypass, circumvent, damage, interfere with, or attempt to deceive by fraudulent means, any university authorized security measure or monitoring device, whether temporary or permanent, that is intended to prevent or limit access to, or enhance the security of, university lands, events, facilities or portions thereof.
- (b) No person may duplicate, falsify or fraudulently obtain a university key or access control device, or make any unauthorized attempt to accomplish the same.
- (c) No person who is authorized to possess a university key or access control device may transfer a university key or access control device to an unauthorized person, nor may any unauthorized person be in possession of a university key or access control device.
- (d) Any university key or access control device in the possession of an unauthorized person may be confiscated by any authorized university official.

UWS 18.13 Penalties.

Unless otherwise specified, the penalty for violating any of the rules in ss. UWS 18.06 to 18.12 shall be a forfeiture of not more than \$500, as provided in s. 36.11 (1) (c), Stats.

Note: Violations of the rules in ss. UWS 18.06 to 18.12 will be processed in accordance with the citation procedure established in s. 778.25, Stats.

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1991, No. 431, eff. 12-1-91; CR 08-099: renum. from UWS 18.07 and am. Register August 2009 No. 644, eff. 9-1-09.

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