

Correctional Consulting Services, LLC

Security Audit Report

South Carolina Department of Juvenile Justice

Columbia, South Carolina

May 24 – 27, 2016

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I. Purpose

The South Carolina Department of Juvenile Justice (SCDJJ) contracted with Correctional Consulting Services, LLC (CCS) to conduct an independent security audit and security operations assessment of the Long Term Commitment Secure Institutions of the Broad River Road Complex (BRRC) in Columbia, South Carolina. The security practices and procedures of the Broad River Road Complex have come under question as a result of recent serious incidents occurring on the complex.

This security audit, and the operational assessment is not a review or investigation of any specific incident(s) that had occurred. This audit is intended to determine if there are existing deficiencies and/or gaps in the security operational; policy, procedures and practices which if not properly addressed, could potentially contribute to future concerns with safety and security on Broad River Road Complex.

II. Objectives

As outlined in the formal agreement between CCS and SCDJJ, the specific objectives included the following:

- Conduct a security audit of relevant facility operations, security procedures, standards, practices, protocols. Assess the level of compliance at the Broad River Road Complex with the department's written security procedures, South Carolina Department of Juvenile Justice Security Standards and, Nationally Recognized Security "Best Practice" by National Institute of Corrections. In addition, the auditors will offer their professional observations.
- Assess the effectiveness and efficiency of the facility's security procedures and practices as it relates to the control of contraband; and scheduled, random routine shakedowns of juveniles and their cells/rooms; control and storage of non-lethal equipment; communications and alert systems; count procedures; control center operations; controlled movement and pass system; use of force; hazard material management; mail; visiting procedures; allowable property; work and school assignments; transport procedures; key control management; perimeter security access/egress controls; physical plant; SOP's; searches; security inspections; tool and sensitive items control; emergency response plans; and use of isolation.
- Assess the overall effectiveness of the Broad River Road Complex policies, procedures, and practices as they relate to the overall security operations.
- Review all policies, procedures, protocols, and practices related to the overall security operations.

- Review correctional officers staffing and training.
- Review any security practice or function, including staff deployment practices during emergencies.

III. Project Approach

The onsite security audit process began May 24, 2016 and concluded on May 27, 2016. On May 24, 2016, The CCS Audit Team met for a pre-audit briefing with members of South Carolina Department of Juvenile Justice Executive Team and Broad River Road Complex (BRRC) Administrative Management Team. Participants in the in-briefing were; Correctional Consulting Services Representatives; Larry E. Reid President/Auditor, Joan Palmateer Consultant/Auditor and Nicole Reid Correctional Consulting Services, Administrative Manager, Data Collector.

The pre-audit briefing included staff introductions, discussion on necessary resources needed to support the audit process, and finalizing the security audit schedule and the daily management team de-briefing schedule. Upon completion of the pre-audit briefing, the CCS Audit Team along with members of the Broad River Road Management Team participated in a comprehensive tour of the BRRC complex.

Upon the completion of the complex tour, the CCS Audit Team received written and electronic documents that included Broad River Road Complex policies, procedures, staffing patterns, SOP's, incident reports, and other documents, requested. The audit team was assigned two well versed and knowledgeable administrators as CCS escorts throughout this audit process.

IV. Audit Team

A. Larry E. Reid

Larry Reid is an independent correctional consultant for Crime Justice Institute (CJI). Larry also provides consulting services to the Criminal Justice Institute, Association of State Correctional Administrators (ASCA) and National Institute of Corrections (NIC) and other organizations, providing expert witness, consultation and training for correctional jurisdictions and other criminal justice entities. As a consultant and trainer for the National Institute of Corrections, Larry has worked nationally and internationally with jurisdictions on facility operational plans; contemporary programs for high risk and segregated populations; staffing analysis; policy and procedure development; organizational management; and correctional security programs.

Larry began his career in corrections with Colorado Department of Corrections as a Correctional Officer in 1987. After holding a number of positions such as case manager, shift commander, security and programs manager, in 2001, Larry was promoted to the position of warden. He

served as warden for Colorado State Penitentiary Administrative Segregation 2002-2007 and Centennial Correctional Facility Close Custody 2003-2007. From 2007-2010, Larry worked at San Carlos Correctional Facility Mental Health Facility. From 2007-2010, he worked at LaVista Female Correctional Facility and Trinidad Correctional Facility. From 2010 to 2014 Larry worked at Colorado Department of Corrections, Central Office. He was Assistant Director of Prisons prior to being appointed to Deputy Director of Prisons. In his departmental executive leadership role, Larry was responsible for prison operations management oversight, effective and efficient use of resources, and supervision of wardens. Larry retired from the Colorado Department of Corrections as Deputy Director of Prison Operations in January 2014 after serving 27 years. In recognition for his dedicated work to improve Corrections, Larry received numerous awards and recognition for his contributions to include, the Colorado Criminal Justice Association's prestigious Harry Tinsley Award.

B. Joan L. Palmateer

Joan L. Palmateer is an independent correctional consultant for National Institute of Corrections (NIC) and other organizations, providing expert witness, consultation and training for correctional jurisdictions and other criminal justice entities. As a consultant and trainer for the National Institute of Corrections, Joan has worked with several Department of Corrections nationwide, offering technical assistance on security audits, high risk offenders, staffing analysis, emergency plan development, PREA Plan development and implementation and jail systems.

Joan's 28-year career with Oregon Department of Corrections began in 1980 where she started her career as a Correctional Officer, was promoted to Corporal, Sergeant, and then Lieutenant as a watch commander. From then on her positions included: Security Manager from 1985-1990; Assistant Superintendent from 1990-1992; Security Manager from 1992-1996; Chief of Security from 1996-1998; the first female Warden in the Oregon State Penitentiary's history of 150 years from 1998-2001; Superintendent from 2001-2004; Prison Administrator from 2004-2006; and Population Management Administrator from 2006-2008.

Joan worked Oregon Youth Authority, from 2008-2010 as Assistant Director of Facilities and Operations. She has received many awards and recognition for her leadership, management and innovative approaches throughout her career. She is most proud of the respect and trust staff have shown her throughout her illustrious career.

C. Nicole Reid

Nicole Reid earned her Bachelor's degree in Criminal Justice and Psychology in 2012. Currently is the Administrative Manager for Correctional Consulting Services. As the manager, she leverages specific ability-based competencies required to: decipher imperative details; prepare written materials for the purpose of documentation, data and conveying information; Efficiently and effectively conduct in-depth research when necessary, analyze and compute information; and interpret root-cause analysis to create action plans.

V. Brief Historical Context

A. Broad River Road Complex Overview

The Broad River Road Complex (BRRC) opened in 1966 with (2) housing units, John G. Richards for males and Willow Lane for females. In 1975, a second male facility Birchwood opened and was added to the 250-acre compound. Based upon the crime and the sentence, in some instances, once a juvenile reaches 17 years old they may be sent to an adult prison to complete their sentence. In 1994, a 14' Perimeter Fence was added to aid in the effort of reducing juvenile escapes from the complex. Currently, there are (8) housing units available to house juveniles with (6) presently in use.

The Broad River Road Complex is a secured complex that houses "Long Term Commitment" High Risk Juveniles with various special needs. BRRC has a maximum operational population capacity of 192 juveniles. On the date of our arrival, May 24, 2016, there were 95 juveniles assigned to the complex housed in single cubicles or single cells in the 5 units and 1 transitional house. BRRC currently have 311 staff assigned of which 236 support BRRC security operations and the remaining 75 non-custody staff provide direct services to BRRC Juveniles. Additionally, South Carolina Department of Juvenile Justice Administrative Offices are located on Broad River Road Complex. There are approximately 231 staff performing a variety of duties that includes statewide functions such as, Executive Leadership, Human Resources, Finance, and Health Services etc.

BRRC offers a variety of educational and vocational programs as well as behavioral and mental health services. In support of the rehabilitative process, BRRC volunteer program offers the juvenile population diverse and meaningful programs and, opportunity to interact with the community in a prosocial way. BRRC mission is to provide quality treatment and rehabilitation in an environment that is safe, secure, disciplined and orderly. The organization places great emphasis on preparing juveniles in its care for success while at the complex and for their return to the community. As an example, some of the educational programs available are: GED Preparation and Testing, Communities in Schools Program, College Programs of Study, and Special Education and Community Service Programs. The vocational programs offered range from Carpentry, Masonry, Auto Mechanics and Technology to Digital Desktop Publishing and Culinary Arts.

Broad River Road Complex also has a police department assigned to assist with complex operations; they are responsible for perimeter security on the inside of the complex, emergency response and juvenile transport services.

VI. Supplemental Sources Provided

The security audit team spent time on site reviewing documents in conjunction with auditing areas of the facility, speaking with staff, juveniles, and compiling other additional information included in this audit report. Information reviewed by the audit team included:

A. South Carolina Department of Juvenile Justice Policies and Procedures

1. C-2.5 Broad River Road Complex Juvenile Residential Programs
2. D-1.19 The Insider Program
3. E-1.0 Case Management
4. E-1.1 DJJ Classification Process and Scope of Classification Services
5. E-1.3 Risk Assessment Process and Instrument/Classification Matrix Model
6. E-1.7 Classification System for Housing in Secure Facilities
7. G-1.2 Detention Center Admissions
8. G-3.1 Evaluation Center Intake Operational Process
9. G-9.7 Logbooks
10. G-9.8 Juvenile Correspondence and Mail Operations
11. G-9.10 Juvenile Count
12. G-9.12 Drug Testing Juveniles in DJJ Facilities
13. G-9.14 Juvenile Personal Grooming and Attire
14. G-9.15 Security Staffing, Shift and Post Assignments, and Schedules
15. G-9.19 Juvenile Behavior Management Incentive System and Progressive Discipline
16. G-9.36R Security Procedures and Practices
17. G-9.37R Special Response Team
18. G-9.40 Supervised Trips to the Community for Juveniles in Long-Term Facilities
19. G-9.41 Supervision of Juveniles in Secure Residential Facilities
20. G-9.42 Juvenile Visiting Procedures in Secure Facilities
21. G-10.2 Notification to Juvenile of a Family Emergency
22. H-2.1R Control and Use of Tools
23. H-2.2 Control of Flammable, Toxic, and Caustic Materials
24. H-3.1 Control of Contraband and Prohibited Property
25. H-3.4R Control of Keys
26. H-3.8 Searches
27. H-3.12 Use of Physical Force
28. I-3.3 Inspections of Facilities and Buildings for Safety and Sanitation
29. J-1.1R Emergency Preparedness
30. J-2.6R Management of Facility Disturbances

B. South Carolina Department of Juvenile Justice Standard Operating Procedures

1. Birchwood High School
2. Calm, Cooperative and Safe Assessment Form (CCS)
3. Cellular Phones
4. Crisis Management Unit
5. Crisis Management Unit Timeline
6. Control and Use of Tools
7. Facility Sanitation

8. Fraternalization (Inappropriate Relationships)
9. Handling Conflict between Juveniles
10. Hospital Security Officer
11. Juvenile Flight Risk
12. Food Consumption for Level Five (5) Juveniles
13. Juvenile Movement
14. Laundry Procedures
15. Meal Protocol
16. Positive Response to Youth Behavior
17. Security Pods for Juveniles
18. BRRC Security Staff Briefings
19. Use of Force

C. South Carolina Department of Juvenile Justice Standard Operating Procedure-SOP's

1. Control Room Officer(s)
2. Pod Officer(s)
3. Floating Officer(s)

D. Recent SCDJJ Security Enhancements and Improvement Plans

Subsequent to recent incidents, SCDJJ initiated actions to address several internally identified issues with the goals of enhancing the capability and reliability of security systems to prevent/mitigate future incidents, improve staff responses to juvenile behavior both positive and negative and, to seek a healthy balance between responsible security measures to protect staff, juveniles and the public while effectively addressing the programmatic needs of high risk juveniles.

The executive staff and complex administrators expressed their commitment to continually evaluating facility operations for improvements in staff and juvenile safety and, complex security. The CCS Audit Team was provided the recently published SCDJJ Improvement Plan as a data source for our review.

E. Additional Documents

1. Emergency Preparedness Plan dated March 2003
2. Active Shooter
3. Juvenile Handbook
4. New Employee Orientation Reference Guide & Appendices
5. South Carolina Department of Juvenile Justice RSD-Daily Operations Shift Report
6. South Carolina Department of Juvenile Justice Police – Daily Operations Shift Reports
7. Staff and Juvenile Interviews
8. Various documents describing mission, staffing, bed space, inventories, count documents, logs and other relevant information associated with security practices.
9. Shift Schedules and Post Assignments

VII. Initial Impressions

The audit team recognizes it takes hard work, commitment and leadership to consistently achieve the levels of quality necessary to successfully manage Broad River Road Complex. We want to acknowledge the entire staff at BRRC for their willingness and their openness to share information and ideas. We found the staff to be hospitable, highly motivated to learn and excited to hear new ideas pertaining to security operations.

The entire SCDJJ management team, specifically Kenneth James, Security Compliance Coordinator and Andy Broughton, Director of Institutional Programs, worked tirelessly coordinating our ability to access every area of the facility. They responded to every request for information, provided clarification on the hundreds of questions we asked them and equally important, they provided insight into the operations of the department and the complex, which helped us in our efforts to provide South Carolina Department of Juvenile Justice a comprehensive audit.

We also would like to acknowledge the participation and involvement of Director Sylvia Murray and Senior Deputy Director Brett Macgargle of Planning and Programming for their enthusiasm and commitment to the auditing process. A critical component in the successful outcome of a security audit is to have support from the top leadership of the organization. With the support exhibited, we are confident that the overall security and safety posture of Broad River Road Complex will improve significantly.

A. Culture

- Staff appear to be at the lower end of morale. We believe this is likely due to the recent incidents occurring at the compound, as well as uncertainty about the direction of potential changes in the agency. Staff reported feeling “wounded” and are trying to heal from the latest incident in February. Both custody and non-custody staff reported they are somewhat confused about where they fit into the scheme of things with the changes occurring in the agency.
- The Staff we spoke to indicated a lack of supervisory, management, or executive staff coming to their location and from their perspective viewed this as a sign that they are not valued. The audit team sees this is an indicator that performance may begin to falter if not addressed. Real or perceived, this should be a high level concern for the executive team. Staff are trying to do what they believe is expected throughout all of the changes however without reinforcement through leadership presence, the opportunity for greater levels of success may well be diminished. It is our opinion that the executive management, senior management and supervisory teams can make a

tremendous difference in the coming year to gain buy in for change by committing to Managing by Walking Around.

- It is apparent and highly appreciated by all staff that Director Murray interacts with staff and the juveniles, responds to emergencies and actively seeks input and feedback from staff as well as the juveniles. Every staff member we interviewed stated they see her often, believes “she cares” and believes she is moving the organization in the right direction.
- When speaking to juveniles, they reported that some staff are better than others but for the most part they were fair. Many of the juveniles we spoke with appreciated the removal of the “trouble makers” from the complex. By doing so has lessened the tension among them. The juveniles report there’s still some gang influence but it is manageable at this time.

B. Overall Sanitation

- Most of the areas we visited needed attention to general upkeep, specifically:
 - Weeds not maintained around fence and areas close to buildings,
 - Litter surrounding various areas around buildings; especially around the confinement and vocational-tech shops adjacent to that building,
 - Outside CMU recreations area for confinement was un-kept and the steps were littered to a degree, which presented a potential safety hazard. We noted areas throughout the compound with the exception of the new visiting building were un-clean and appeared lacking in janitorial services.

VIII. Security Audit Objectives: Observations and Recommendations

The content of this section of the report reflects observations and recommendations of those areas for which a recommendation is warranted, we will not be reporting on areas we found to be in compliance. This report “by exception” format does not specifically acknowledge all of the security procedures and practices that either met or exceeded NIC’s compilation of security “Best Practices.” We report in this manner for the sake of brevity and in no way to minimize all of the positive work being done by the staff on the complex each day. We anticipate the information provided in this document will be a useful tool for identifying security gaps and ultimately improving the overall safety and security posture of Broad River Road Complex.

The security audit outcomes noted are accurate assessments and evaluations of what was observed during our stay at Broad River Road Complex. The assessment is based upon the “Best

Practices” security auditing guidelines identified by the National Institute of Corrections (NIC). It is important to note that these guidelines have been successfully applied to Jails and Juvenile Detention Facilities efforts to improve and/or enhance their security systems, practices and staff performance.

CONTROLLED MOVEMENT

To ensure accountability for all juveniles and the safety and security of staff, juveniles, and visitors.

There is written policy/procedure that requires orderly supervised control of juvenile movement.

Observation: Juvenile movement within the compound is accomplished by staff escort from units to school, industries, meals, and other areas. The staff stay with juveniles, or a staff is present in some locations to observe and monitor juveniles while in program (for example, vocational classes have one staff to a classroom) juveniles can be moved by van to and from units, or in some cases walked/escorted by staff to location. We observed juveniles congregating in places while waiting to be escorted back to their units, especially outside the dining hall. SCDJJ Standard Operating Procedure G-9.41; G-3.8 clearly articulates the juvenile movement expectations. Based upon our observations security staff and supervisors are failing to fully implement the procedural guidelines of the SOP.

Recommendation: Ensure at a minimum, security supervisors are present and observant during all mass (unit, pod) movement and the movement follows the above procedural guidelines. In addition, it is recommended that the movement schedule allows adequate time for the movement to occur so there is minimal or no sight and sound contact with other group movement. Also ensure all staff, contractors and volunteers are knowledgeable of the controlled movement expectations.

All movement systems have a safeguard system to ensure juveniles arrive at their destination. The system includes:

- Communication by which staff are alerted that a specified group is to be in their area at a specified time;
- Predetermined time-frames within which movement must occur and beyond which the movement time is excessive;
- Written procedure specifying reporting actions to be taken if the juveniles do not arrive within the specified time.

Observation: The above safeguards are not in the Juvenile Movement SOP

Recommendation: Add the above safeguards to the Juvenile Movement SOP and monitor staff practice.

Recommendation: SCDJJ consider a system-wide centralized computer based scheduling management system for such things as appointments, school attendance, visiting etc. The system will allow SCDJJ Leadership to support controlled movement with technology by prioritizing scheduling events from different areas, sending automated notification to the unit control and the receiving entity of the approved scheduling.

Recommendation: The utilization of tracking technology in this area may not be cost effective. All juvenile movement is under staff escort on BRRRC. It is our opinion, this method of controlled movement is the most effective and responsible for managing high risk juveniles on a secured complex.

CONTROL CENTER(S)

To facilitate the secure management of security systems, including keys, communications, juvenile and staff movement, emergency supplies, and other security equipment and control access and egress to the facility or area of responsibility.

Written SOP's include a comprehensive hostage situation statement, such as: "No person under duress retains authority to give orders or direction to any staff member" and "No juvenile will be released with hostages."

Care is exercised to ensure accurate identification of staff or juveniles before access or exit is permitted through controlled doorways and gates. The control center is uncluttered and has sufficient storage space for all equipment. All equipment is properly stored to facilitate access and counting. Sight lines to gates, doors, and persons provide clear line-of-sight and ability to operate in a safe and secure manner.

All equipment is serviceable and functioning properly including video monitors, intercoms, fire alarms, electronic locking systems including indicator lights, and perimeter detection system alarm indicators.

Observation: Our review of SCDJJ Standard Operating Procedure (SOP) Post Assignment-Control Room Officer(s) dated 1 July 2014, there is no hostage situation statement included.

Recommendation: Include hostage situation statement in control room SOP.

Observation: In the Unit Control rooms that did not have tinted reflective film installed, the control room door windows were covered with pictures or paper. The narrow parallel windows on each side of the unit control were left uncovered. When we inquired as to why the door windows were covered staff responded, to prohibit the juveniles from looking into and observing control room functions. With the larger window covered it was difficult to observe escorted movement entering and exiting the unit and the condition of the escorting officer with the door windows covered. DJJ is in the process of tinting all Control Room windows.

Recommendation: Place in department policy and SOP that control room door windows are to remain uncovered as a safety and security measure.

Observation: BRRC does not have software technology available that will allow for unit control operations to be overridden from a central location during an emergency event.

Recommendation: Conduct a cost analysis for installation of centralized unit control override system for BRRC. **Requires cost analysis**

Observation: A significant part of the security auditing process is to observe security camera's field of vision and the condition of the cameras. We were able to accomplish this in the majority of the security posts that require camera monitoring. What we observed was a number of security cameras in need of maintenance, repair or replacement. The agency does have a camera replacement/addition plan and is currently adding and replacing cameras on the complex.

Recommendation: Prioritize maintenance, repair or replacement for current cameras in operations when needed. Add a section to the Daily Operations Shift Report to note the condition/status of the security equipment on the post. This report could coincide with the work order process. The status is documented daily on each shift.

COUNTS

To provide accountability for the entire juvenile population at all times and at all locations to prevent escape and ensure a safe, secure living/ working environment and the safety of the general public.

There are at least 6 six formal counts in a 24 hour period of which two counts are mandatory standing counts.

There are at least two staff counting the same group of juveniles in each count area. Preferably one officer/staff maintains a position where the entire group being counted can be observed to prevent movement of any kind.

It is required that industries, construction, and delivery vehicles that cannot be easily searched be locked and remain in the institution until a count has cleared.

It is required that all juvenile movement ceases from the time count is announced until the count is cleared.

Staff are required to count only living, breathing flesh.

Observation: SCDJJ Policy No. G-9.10 D (1) states there will be a minimum of (4) formal counts in a 24 hour period between 5:00am and 7am, 11:30am and 1:30pm, 3:00pm and 5:00pm,

8:00pm and 9:00pm. We were advised the current practice is now 5 formal counts per 24 hours. According to the hours given to us, there is a nine-hour period of time from the 8pm count until the 5am count.

Recommendation: Update SCDJJ policy to accurately reflect the current times and add an additional formal count midway during the nine-hour span of time of 8pm to 5am.

Observation: SCDJJ Policy NO. G-9.10 is silent regarding the required number of staff to conduct a count. During count we observed (1) officer counting each pod.

Recommendation: Establish in SCDJJ Policy the standard of (2) officers are required to perform count in the manner described above.

Observation: We observed juvenile movement during and prior to the count being cleared.

Recommendation: SCDJJ Policy is silent regarding restricting juvenile movement during count times. Include language in policy that restricts juvenile movement during count times unless it is for emergency purposes.

[REDACTED]

[REDACTED]

Observation: SCDJJ Count Policy is silent regarding ensuring that the juvenile is alive and not in distress during count.

Recommendation: Add the requirement for counting staff to ensure they are counting a living, breathing flesh.

EMERGENCY RESPONSE PLANS

To insure that approved contingency plans are available to command staff and that these plans provide for a response to emergencies that will increase the likelihood of a successful resolution providing for the safety of all involved and the security of the institution.

There is a departmental/agency policy requiring detailed emergency plans for all institutions and establishing a format and general requirements for inclusion in the institutional plans. Additionally, we were given a document dated March 1, 2003 titled Emergency Preparedness plan.

Observation: We found SCDJJ the Emergency Preparedness plan met the National Institute of Corrections Best Practice policy expectations.

Recommendation: Review the Emergency Preparedness Plan for relevancy and updating and consider utilizing nationally recognized widely accepted National Incident Management System (NIMS), Incident Command System (ICS) as the department's emergency management response model.

FRONT COMMUNITY CONNECTIONS CENTER (PEDESTRIAN GATE)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

HAZARDOUS MATERIALS MANAGEMENT

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

KEY CONTROL

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

MAIL

To ensure that the institution mail room operations are consistent with U.S. Postal Regulations and Department policy, and provide adequate safeguards for mail being delivered to staff and juveniles.

There is written policy governing the handling of juvenile mail including mail and package receipt, inspection, and delivery; legal mail; authorization and documentation of the reading of mail (if required); receipt and handling of money; and the authorization, procedures, and documentation for denial of prohibited types of mail.

Observation: During our review of mail operations, we found no issues in this area.

NON-LETHAL EQUIPMENT STORAGE AND HANDLING

Observation: The SCDJJ Police are assigned to the Inspector General (IG). The IG Offices are located outside of the BRRC Perimeter. The SCDJJ Police store non-lethal equipment and Oleoresin Capsicum in a secured storage shed on the IG's grounds.

Recommendation: If a determination is made to authorize custody staff to carry OC then a secured storage area should be identified on the compound for storage, policy procedures developed for handling, use and accountability (perpetual inventory).

PERIMETER SECURITY

[REDACTED]

[REDACTED]

[REDACTED]

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PHYSICAL PLANT

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Requires cost analysis

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PROPERTY

To control juvenile opportunity to acquire, store, transmit, and/or dispose of items of personal property except through authorized channels and to maintain a safe and healthy institution environment.

There is written policy establishing limitations on the amount of property a juvenile may have in his/her possession, a listing of allowable items, and procedures for managing juvenile property.

Observation: During the audit process the team requested department SOPs for juvenile property allowances. The management was unable to produce one. We were provided DJJ BRRRC Authorized Juvenile Property List from the Juvenile Handbook.

Recommendation: If no property policy exists, the team recommends a comprehensive policy is created for department wide communication to staff, juveniles, and families and for consistency of application throughout the complex.

SEARCHES

To provide surveillance of juveniles, staff, and visitors and all areas of the institution to ensure a safe, secure and healthful environment that is free of dangerous weapons and other contraband.

Observation: We found SCDJJ Policy H-3.8 to be a well written and comprehensive policy. The following recommendations are for inclusion into the policy for specifying and clarifying expectations.

Recommendation: Policy requires the search of all juvenile cells/rooms at least monthly.

Recommendation: All cell/room searches are documented and logged in an official search log with notation of the search date, cell searched, and contraband discovered.

Recommendation: Cells/rooms are to be left in a reasonably neat and orderly condition by the officer conducting the search. Care is taken to ensure authorized property is not damaged or disposed of.

Recommendation: Equipment such as flashlights, gloves, tools and mirrors are made available to officers conducting searches.

SECURITY INSPECTIONS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

SEGREGATION (SPECIAL MANAGEMENT)

To provide for the humane and secure control of disruptive inmates, and ensure a safe environment for staff and inmates.

SPECIAL MANAGEMENT-USE OF ISOLATION

To provide for the humane and secure control of disruptive juveniles and ensure a safe environment for staff and inmates.

Staff assigned to disciplinary or administrative segregation units are experienced in security and inmate management. Probationary staff are prohibited from occupying a post in these units.

Juvenile Federal Performance-Based Detention Standards Handbook

[REDACTED]

[REDACTED]

Observation: Juveniles assigned to ITU are placed in restraints (leg irons and handcuffs) when they are out of cells. This includes time spent in dayroom. According to staff, that time can be upwards of 5-7 hours a day. The juvenile is placed in these restraints because they represent a risk to staff because of past assaultive behavior.

Recommendation: It is standard practice in the juvenile agencies to restrain juveniles when moved to visiting, school, etc., however, it is not a general practice to leave them in restraints on the unit dayroom for long periods of time. Juvenile Federal Standards states: Restraints are only used as necessary in the least intrusive means possible and until the behavior is controlled. If SCDJJ continues this process with restraints for long durations of time, medical staff should see the juveniles(s) and document every 2 hrs.

Recommendation: Re-visit the department policy for this area and consider incorporating Juvenile Federal Performance- Based Detention Standards.

Observation: DJJ Policy G-3-4 Isolation of Youth states: If juvenile remains in isolation room confinement more than 4 hours, required staff will complete the Daily Confinement Checks Form G-3-4A each day. Upon review of the Daily Checks forms for one week on one youth it was discovered that the only consistent staff to see juveniles and complete the form was the social worker and the medical staff. The 1st and 2nd shift supervisor, Psychologist and education are to check juveniles and document their presence also.

Recommendation: Ensure staff is following policy and all persons required to visit CMU are doing so and completing the required documentation and the Daily Checks Form.

Observation: The isolation and 6 week program areas in CMU were dark. The cell windows were painted to prohibit juveniles from interacting with others on the complex. Painting of the cell windows impeded natural light from entering the cells.

Recommendation: Improve the lighting in the isolation and 6 week program units and remove paint from the cell windows.

[REDACTED]

Requires cost analysis

[REDACTED]

SOP'S/STANDARD OPERATING PROCEDURES

To establish guidelines for the development, revision, implementation, and monitoring of post-specific security procedures and requirements.

Observation: There were no post orders available; however, we were told there were Standard Operations Policies (SOP), which is just another name for post orders. We located three SOP's, however, they were extremely short (half page) and had no relevant information generally required of staff to accomplish their duties.

Recommendation: All SOP's are written based upon the above Objective for this audit area. It is our recommendation that the procedure is established for and available minimally for each security post.

Recommendation: The Security Administrator assumes responsibility for establishing and maintaining a system to ensure that SOP's are reviewed and signed by the assigned officer, relief staff, and others rotating through the post on each shift.

Recommendation: There is written policy governing the interim amendment of SOP's and the ongoing review and annual revision of all SOP's. Each "retired" Standard Operating Procedure is archived for a minimum of three years for reference in legal challenges.

Recommendation: All SOP's contain general instructions similar to the following, and others deemed important by the management team.

"Any employee taken hostage, or otherwise under duress is without any authority, regardless of rank." "SOP's cannot cover every incident or eventuality. Employees assigned to any post shall use good judgment and pay careful attention to the general and specific issues and details related to the post of assignment."

Recommendation: SOP's provide specific information concerning the expectations and requirements related to the post assignment with some examples listed below.

- Zone of Control
- Inventory Control
- Key Control
- Use of Force (including helicopter escape)
- Traffic Control
- Count Procedures
- Escort Procedures
- Relief Procedures
- Incident Reporting
- Record Keeping
- Scheduled Activities
- Emergency Procedures for that Area
- Hazardous Material Control
- Maintenance/Repair Requests
- Cell/Cubicle/Area Searches

TOOL AND SENSITIVE ITEM CONTROL

To provide control and accountability for all tools and implements as well as other sensitive items stored within or that are brought onto the complex for daily use. Qualified security staff have been designated as tool control officer and assistant tool control officer.

DJJ Policy H-2.1R states all tools are to be inventoried, etched with specific shop identifier, all tools in respective areas inventoried and inspected weekly with quarterly inventories by managers, tools were to be checked in and out.

Qualified security staff have been designated as tool control officer and assistant tool control officer.

Observation: The Inspector General has overall responsibility for tools management, accountability, inventorying and processing. Per SCDJJ Policy H-2.1R, Tool Control Management responsibility is further delegated to the respective department heads and principles.

Recommendation: For consistency of application and management of tools on BRRC, we recommend the responsibility becomes the Security Administrator's responsibility. That a Qualified Tool Control Officer is selected to centralize the tool control function and that person reports directly to the Security Administrator. The tool control officer is responsible to ensure policy driven compliances for, complex procurement, categorizing of tools, tool identification, storage areas, tool issuances, returns, ensuring no excess tools etc. The department heads are responsible for monthly inventorying, and department staff policy compliance.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Industries Carpentry Shop

Observation: Tool inventory, storage, shadow boards, overall organization and accountability was great. This area could serve as a model for other tool areas within the compound. We suggest staff visit this area and consider using some of his practices and documentation.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

TRANSPORTATION PROCEDURES
To ensure the safety of staff, juveniles, and the public during the transportation of juveniles.

There is written policy that establishes procedures for the transportation of juveniles of varying custody levels between institutions, to community services, and by other than department or institution staff.

Observation: In our review of SCDJJ Policy and Procedure H-3.10, Transporting Juveniles we found the policy to be comprehensive and it addressed the majority of NIC’s recognized “Best Practices.”

Recommendation: We recommend the policy clearly delineate transport responsibilities for security staff and SCDJJ Police. By doing so, it will clearly identify the transport post needs for a staffing analysis.

[REDACTED]

USE OF FORCE

To provide direction in the use of force and security equipment to prevent injury to staff, juveniles, and others; prevent the destruction of property; and minimize the risk to the general public associated with the escape of juvenile(s).

Observation: We did not find any major procedural discrepancies in this area. However, when we interviewed staff there was uncertainty about the use of physical force, restraints and non-lethal force.

Recommendation: Include Use of Force in the “Back to Basic” annual refresher training. If necessary, training can be offered as frequently as determined by Executive Staff. Ensure management, supervisory, operations, and medical staff responsible for use of force related duties are trained consistent with department requirements.

VISITING

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Requires cost analysis

WORK and SCHOOL ASSIGNMENTS

To provide opportunity for the development of work skills and reduce juvenile idleness in a manner which provides for staff safety and public protection.

Observation: We found no issues with the process of assigning the juveniles to educational, vocational, housing and unit work. We found the multi-disciplinary process to be comprehensive and effective.

[REDACTED]

[REDACTED]

IX. Professional Findings

The following are the auditors' professional opinions and observations of specific areas of noted concerns. An extensive history of correctional knowledge was used to determine the viability of the observations and its relevance to the overall security of the complex. In this area of the report the auditors offer observations and recommendations that are consistent with mitigating security lapses in policy, procedure and practice. The following findings are covered separate from the security audit as a courtesy to the South Carolina Department of Juvenile Justice for consideration in the hopes of adoption and implementation.

Adult Offender Transportation

[Redacted text block]

[Redacted text block]

Contractor Services

[Redacted text block]

[Redacted text block]

[Redacted text block]

[REDACTED]

Department Policies, Standard Operational Procedures and SOP's

Observation: During our document reviews we found department policy, standard operating procedures (SOP) and SOP's lacked succinctness in the procedural requirements. We also were given department directives that had not been updated for a number of years. When we visited a post and asked for SOP's and any other instructional documents for the post, staff gave us folders with outdated policies SOP's and directives signed by prior facility leadership.

Recommendation: Conduct an immediate review of security related policies for updating and codifying security operational standards with the Director's signature. It is recommended to adopt the American Correctional Association Standards, which requires an annual review of all department policies, SOP's and procedural manuals (ACA Standard 4-4013). Ensure the security related policies and procedures are clearly articulated and succinct for clarity of expectation and consistency of application. Eliminate the practice of issuing memos to direct security expectations and operations.

Recommendation: Implement a policy process for when there is an immediate or emergency need for a policy change either temporarily or permanently. Consider utilizing an Executive Directive (ED) which is signed by the Director of SCDJJ or designee during the Director's absence, for the purpose of providing specific procedures or information not delineated in current policy. The ED can have a designated duration for the ED to be in effect, suggest not to exceed 30 days, which will allow time for the changes if permanent to be placed in department policy. Once the designated duration of the ED has expired, the ED is no longer valid.

Duress Alarm Monitoring

[Redacted]

[Redacted]

Emergency Preparedness Training

Observation: During the security audit process we were informed and verified that all staff receive safety, disaster and fire evacuation training during New Employee Orientation. The complex Fire Marshall gives the training. When inquired if all staff received emergency preparedness training the response was no.

Recommendation: SCDJJ consider authorizing National Incident Management System (NIMS) Training to designated staff. This is a nationally accepted FEMA approved emergency management system that has been adopted by the vast majority of response agencies nationally. The training is structured and can be taken on-line. Upon completion and successful test of the various sections, a certification of completion is provided. NIMS Training provides a clear methodology for responding to and managing all types of emergencies to include disturbances.

Recommendation: Requirement in policy for all staff to receive mandatory training on requirements and expectations during an emergency. Training includes tabletop drills and actual drills to ensure staff are being trained and tested.

Facility Communications and Alert Systems

[Redacted]

[Redacted]

[REDACTED]

[REDACTED]

Recommendation: Create a department policy that codifies the practice.

Observation: All communications and duress alarm systems are not tested at the beginning of the shift.

Recommendation: At the beginning of each shift all communication systems and duress systems are tested for serviceability.

Birchwood School

Observation: The walk-through electronic metal detectors are located approximately 1 foot inside the school's entry and exit doors. When the system alarms, the remaining juveniles remain outside until a search is completed.

Recommendation: Use only the main entry school doors as the primary ingress and egress into the school for all juveniles. Move the walk through metal detectors inside the building to the left an additional 3-5 feet. By doing so the school doors could be utilized to assist with regulating the number of juveniles going through the search procedure upon entry and exit.

Recommendation: It is recommended that teachers are outside of their rooms during the entry and exit process. They are not to enter or exit their room without correctional staff presence.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Observation: The major, and another staff share an office with an interview room in front along the school corridor. The windows are floor length and covered with a mural or photo like sheets resulting in an inability for staff or others to see in when walking by.

Recommendation: Remove the window covering to at least a minimum height that allows visibility from the corridor.

Observation: School Guidance Staff windows to corridor have blinds, which prohibit staff visibility from corridor. Staff stated that they are almost always closed even with juveniles in the room.

Recommendation: Remove blinds or assure they are maintained in the open position to maintain sight anytime a juvenile is in that area or in the offices.

Less Than Lethal Response- Oleoresin Capsicum (OC)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] **Requires cost analysis**

Main Gate Vehicle Entry

Observation: We were informed the main gate vehicle entry staff are assigned to the Inspector General’s Office.

Recommendation: Controlling vehicle and passenger entry into the complex and searching of vehicles is a fundamental security function. It is our recommendation that the responsibility for this critical security function is assigned to the Facility Administrator of Security for coordination of services, performance and accountability.

Observation: During the audit of the Complex Main Gate, we were also informed the staff who worked that post are not certified correctional officers. We also learned the staff assigned to this post is supervised by a certified correctional lieutenant.

Recommendation: That certified correctional staff are assigned to the Main Gate and the Main Gate is identified as a “critical” security post.

Number of Security Staff Required

Observation: During our time on the complex, we conducted a cursory review of Broad River Road Complex officer assignments, scheduling, identified posts and deployment. The auditors were unable to calculate the “operational staffing level” for the number of posts and positions required for each 12-hour shift as the information was not readily available. The actual number of officers required to determine staffing requirements for either the operational or minimum staffing is derived by applying a shift relief factor. The shift relief factor is a multiplier applied to the number of posts to determine the actual number of staff positions required to operate the

posts on specific days (7 days, 6 days, 5 days etc.) with additional positions to provide relief for such things as, weekends, holidays, vacation, training, and sick leave funeral leave and so on. What we observed is when a scheduled staff is not at work, the complex supervisors are relegated to pulling security positions from other assignments to meet “critical security post’s needs.” The auditors were informed that there is no known relief factor for Broad River Road Complex.

Recommendation: BRRRC undergo a comprehensive staffing analysis in order to accurately determine the number of staff required to fill posts with relief that are required to meet the necessary critical security functions on the complex.

Perimeter Security

[Redacted]

[Redacted] Requires
cost analysis

Personal Alarms

Observation: We observed a number of direct service staff, such as medical, social workers, classification, mental health, and volunteers etc. who are not issued a radio or a personal alarm device.

Recommendation: SCDJJ create a department policy, procedures and identify non-uniformed staff who are required to have personal alarm devices. **Requires cost analysis**

Security Audit Program

National Institute of Corrections states in the Security Audit Program Guide, that, “A security audit is a process for determining the extent to which policy, procedure, standards and practice combine to provide a safe and secure institutional environment. Included in this process is a detailed evaluation of every major aspect of an institution’s security program.

The work of the security audit may be best described as a risk assessment. The function of a risk assessment is to determine the likelihood of a significant security problem of

vulnerability to injury, escape, disruption or destruction of property because of the inadequacy of policy, physical plant or performance. A security audit, or risk assessment is the process of determining the risk remaining after all normal management safeguards have been applied, including clarity of policy, procedures, and Post Orders/Standard Operating Procedures; staff training, physical plant accommodations; and daily supervision activities.”

Observation: SCDJJ does not have a Security Auditing Program.

Recommendation: Create a comprehensive security auditing program based upon security auditing principles that will best serve the department. The audit areas listed in this report could very well represent the framework for the security audit document.

Staff, Guests and Vendor Searches

[Redacted]

[Redacted]

Requires cost

analysis

Staff Supervision

Observation: During our time at BRRRC, we did not see supervisors conducting supervisory functions with staff.

Recommendation: A central part of supervision is keeping staff familiar with policy and procedure, and ensuring that they are implementing the policies and procedures fairly and consistently. This is particularly true for policies that affect safety and security. Provide training for supervisors that is tailored to the mission and expectations of SCDJJ. We also recommend consideration this training becomes mandatory for existing supervisors and a prerequisite for future supervisory candidates.

Staff Training

Observation: The department's new training program appears well administered, with a wide range of pertinent topics addressing a variety of aspects pertaining to correctional work and expected performance. However, due to our discussions with a number of staff on posts, we realized there were staff who were unfamiliar with basic security procedures.

Recommendation: That the training program include Back to Basic refresher material on basic security procedures and specific post responsibilities. During the course of interviewing officers on their posts it was discovered that some were unaware of the specific requirements of the post.

Recommendation: As a result of our review in this area, the following staff training is recommended for consideration:

- Corrections Fatigue Training - Staff Wellness
- Motivational Interviewing
- Crisis Intervention Training- Identifying Mental Health Based Problems
- Youth Trauma Informed Training

Systems Checks/Vulnerability Tests

Observation: Currently SC Department of Juvenile Justice does not have a system in place to routinely test security systems and staff security related performance. We would recommend the consideration, development of system checks.

A security system check is a simulated emergency designed to test the adequacy of emergency plans and to test staff knowledge, practice, response, and equipment in various situations. It assists management teams to identify areas for staff training, and such tests heighten awareness of potential risk and vulnerabilities that are present on the compound. The purpose these checks and tests is not to trick the staff. They are designed to enhance staff knowledge as to "why" such security practices are in place and equally important, it causes supervisors to observe, demonstrate and coach desired security performance expectations.

Recommendation: SCDJJ develop and implement system checks and vulnerability tests as part of the overall improvement sustainability of the security systems on BRRC. There are two critical components we recommend employing when implementing security checks and vulnerability tests. They are:

- Security system checks should be announced beforehand, and an example or two provided so that staff know what to expect. The purpose of the program

should be clearly announced and staff informed that discipline will not follow staff “failure” of a test. Rather, steps will be taken to improve performance in the future, be that by training, guidance, mentoring, or other types of assistance. Staff should know this is not an “I gotcha.”

- Security system checks should never expose staff or juveniles to risk or harm or injury or jeopardize security. They should be purposeful and well thought out and authorized by administration. Supervisors should be encouraged to discuss duties with staff on post and question them (in non-threatening manner) concerning their knowledge and skills. Before authorizing security system checks, the following should be considered:
 - What is being tested?
 - Who should participate?
 - Who should have advance notice of the test?
 - What safeguards should be in place?
 - What specific instructions should be given to the participants?
 - How long will the check continue before termination (if applicable)?
 - How will the debriefing be handled?

Some examples of system checks are:

- Asking a perimeter gate officer, “What would you do if there were an emergency inside compound to identify non-staff persons still inside compound?”
- Determining if the visiting room is searched after a visit, leave an envelope in the room with a note in it that directs: “When you find this note, return it immediately to the Captain.”
- Similarly, a card with a similar directive can be affixed to the perimeter fence, to determine if those checking the perimeter are paying attention to the fence and its condition to test responses and response times to perimeter intrusion, or placing a note in a transport vehicle testing the thoroughness of vehicle searches.

Following a system check, a debriefing should always be held with all staff involved. Include the institution’s training supervisor to reinforce the administration’s interest in increasing the effectiveness of the training. The employee’s supervisors should be present, and members of the administrative team should participate whenever possible.

Consider making system checks part of a monthly report to ascertain re-occurring failures re-assessment of policy, procedure, practice and supervision.

Conclusion

CCS adapted the widely accepted National Institute of Corrections Model Security Audit Instrument to audit the Broad River Road Complex. The audit instrument consists of 21 audit areas comprised of 470 Best Practice Security Guidelines. The outcome of the security audit resulted in 77 recommendations. To further enhance safety and security on Broad River Road Complex, CCS auditors 'provided their professional observations which resulted in an additional 33 recommendations.

CCS observed Director Murray's strong commitment to do whatever was necessary to improve the overall safety and security for the staff and juveniles at BRRC. The department's efforts are evidenced by the implementation of the Security Enhancements and Implementation Plans dated March 6, 2016 and by authorizing a security audit of the complex.

It is the opinion of Correctional Consulting Services by implementing and maintaining the audit recommendations, Broad River Road Complex will experience significant improvements in the overall safety, security, staff performance and complex operations. Additionally, the department will be in a better position to address issues that could potentially jeopardize the safety and security of the complex and the community as a whole.