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
17. G-9.37R Special Response Team
18. G-9.40 Supervised Trips to the Community for Juveniles in Long-Term 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. Fraternization (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
   2. Active Shooter
   4. New Employee Orientation Reference Guide & Appendices
   5. South Carolina Department of Juvenile Justice RSD-Daily Operations Shift Report
   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 BRRC. 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.

**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)**

*Observation:* There are three doors leading inside the compound at this gate: outside door, inside door and a metal gate at juncture of inside compound. All three of these doors are open from 8:00am to 8:00pm. A juvenile could run through the gate to freedom. There is either one staff or two depending on time of day and what is going on.

**Recommendation:** Secure one door or gate so visitors and others have to be let through secure gate when there are no juveniles present.

*Observation:* The top of the overhang on inside of gate house has little protection to deter juveniles from climbing over the top to freedom.

**Recommendation:** Place 18” razor ribbon on top of overhang or roof inside to provide an extra layer of security.

**HAZARDOUS MATERIALS MANAGEMENT**

To provide an environment free of caustic or toxic materials and hazards and ensure that juveniles do not have access to materials, which could be used in a harmful or destructive manner.

*Observation:* Even though SCDJJ Policy and Procedures H-2.2, Control of Flammable, Toxic, and Caustic Materials requires perpetual inventories, we found that perpetual inventory of caustics, chemicals has not been developed or maintained in the areas we visited on the complex. Each area audited had a hazardous chemical storage locker appropriate for caustics; however, we observed chemicals that were not stored and left out in various areas of shops particularly in vocational training building. We found bottles and containers, which were not labeled as to the material contained within. Also, we consistently found that MSDS manuals were not readily located in areas for use in case of exposure.

**Recommendation:** Develop a standardized perpetual inventory sheet for hazardous materials stored in all areas. Maintain and document inventory as hazardous materials are used. Place all hazardous materials in the cabinet and maintain in locked position except for issuance to juveniles. Issue only the amount necessary. Safety manager should audit all hazardous materials once every six months for strict accountability.
KEY CONTROL

To provide control and accountability of all keys and locking systems and establish key control procedures that, when properly attended, will afford the protection and security intended in the design of the locking systems.

A trained staff member is assigned to assist the locksmith and to provide backup assistance in the absence of the locksmith or during institution emergency.

The permanent issue of keys is controlled by institution policy and is limited to exceptional circumstances. A quarterly inventory is conducted of all permanent-issue key rings.

Emergency keys are included in the daily key count.

Observation: SCDJJ Department Control of Keys Policy H-3.4R is comprehensive and covers a majority of the components to ensure management, accountability and security of the keys.

What we found were inconsistencies in practice for this critical safety and security area. We determined the inconsistency was based upon the number of “Key Control Officers” and their responsibilities. We were advised each department on the complex has a key control officer whose responsibilities include the issuing and tracking of keys.

Recommendation: The issuance and tracking of keys for the complex becomes a centralized process managed by the Security Administrator’s Office only and should become the sole responsibility of the BRRC Key Control Officer.

Recommendation: The BRRC area departments’ key control responsibilities need to be regulated to conduct local inventories with the Complex Key Control Officer when scheduled, reporting loss, breakage and failure to return keys to the Complex Key Control Officer.

Observation: During the security auditing process we inquired about the key control process for the Vocational Shop Instructors. Those key rings contain keys for the tool storage and hazardous material storage areas. We were advised those keys are take home keys.

Recommendation: Vocational Instructor keys are no longer authorized as take home keys. They are secured in a centrally located locked box and signed in or out daily or a chit system is used.

Observation: Emergency keys on the complex are not counted daily.

Recommendation: All emergency keys on the complex are accounted for daily.
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**
recommended that all contraband is stored in a secured locker as required by department policy.

Observation:
Main Gate staff were unaware of a Standard Operating Procedure (SOP) written that defines their duties for the Main Gate post.

Recommendation:
Create a SOP that clearly defines the responsibilities of the post and performance expectations for the staff and the supervisor to include emergency information that they would be required to know in case of an incident, escape, etc.

Observation:
Vehicle truck exit gate has a 5" gap between gate and fencing. Smaller juveniles could manipulate their way through it.

Recommendation:
Place another pole in gap to mitigate attempt to escape.

Observation:
There are outside culverts than run inside the perimeter on various locations along the perimeter fence. None of the culverts have rebar secured in a manner that prohibits outsiders from assisting juveniles to escape from within.

Recommendation:
Secure all outside culverts with rebar, welded and secured for mitigation of escape attempts.

Observation:
There are old vehicle and pedestrian gates along the perimeter fence.

Recommendation:
Consider removing those if no longer needed. They are secure and welded; however, removal would eliminate the constant maintenance on them. Requires cost analysis

Observation:
There is fence fabric at the bottom of fence in back of Omega Unit that has been damaged and unraveled. Exposure is approximately 4 inches wide.

Recommendation:
Repair fence fabric as soon as possible.

Observation:
SCDJJ Police duties include inspecting, recording and notifying of the condition of the perimeter fence. They are to notify the Police Shift Supervisor of any breaches or potential breaches in or around the perimeter fence. We reviewed the 1st, 2nd and 3rd shift SCDJJ Police Daily Operations Shift Reports dated 05-21-16 thru 05-24-16. Each shift report noted the perimeter fence was "10-4."

Recommendation:
Based upon the audit findings ensure the SCDJJ Police are aware of the performance exceptions. This can be accomplished through training and increased supervisory review.
Observation: There are numerous trees encroaching on the fence line, two or three actually pushing against the top of the fence. These trees could make for a perfect escape point.

Recommendation: Remove trees impeding the perimeter fence as soon as possible and consider removal of trees up to a growing distance of 70 feet from the perimeter fence. Requires cost analysis.

Observation: During our perimeter security audit during darkness, we discovered the perimeter and complex illumination was insufficient to the point of excessive darkness throughout the complex and the perimeter fence.

Recommendation: Complete a complex lighting scheme by a certified lighting engineer. Requires cost analysis.

PHYSICAL PLANT

To provide housing, activity, operations, and support space that is suitable to the needs of the juvenile population and staffing structure and provides for the safety and security of staff, juveniles, and the community.

Observation: The overall condition and operating status of the complex’s physical plant we determined to be in good operating condition. The below recommendations for this area represents areas of reinforcement for inspection, testing and for safety and security enhancements.

Recommendation: All security system related power/technology equipment is inspected for proper operation and is routinely maintained and maintenance documentation is available for periodic review.

Recommendation: Security systems (emergency doors, duress alarms, communications, fire suppression systems, cameras etc.) are tested for functionality on a regular basis with documentation of testing outcomes.

Recommendation: Emergency generators provide 100% power back up to critical security systems (lighting, security door operations, etc.) and instantaneous, 100% battery based uninterrupted power supply (UPS) to critical security functions such as communications, alarm reporting, and computer systems. Establish a priority of ensuring uninterrupted power availability in the Crisis Management Unit (CMU). Requires cost analysis.

Recommendation: Ensure Emergency generators have a minimum of 72-hour fuel supply and a locking cap. Requires cost analysis.
Recommendation: Ensure designated executive and administrative staff and supervisors have knowledge of which systems the emergency generator will operate in event of an emergency.

Observation: The audit team was unable to locate SCDJJ policy or procedure governing the supervision of construction within and adjacent to the secure perimeter, including security clearance of construction workers, vehicle access, tool inventory and control, supplies and equipment, hours of work, and supervision of worker and vehicle or equipment movement.

Recommendation: SCDJJ create a department policy to address the management of construction and repair sites.

Recommendation: Secured fencing is installed around major construction areas within the secure perimeter of the institution within which all vehicles, equipment, and supplies are secured.

Recommendation: Any planned interruption of utility services or stoppage of juvenile movement or program is communicated to executive staff and security administrator no less than 48 hours before its occurrence.

Recommendation: Accommodation is made to ensure safety and security when construction activity creates a hazard of any nature including reduced surveillance capability.

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 BRRC 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

There is written policy that requires systematic inspection of all equipment and areas of the institution and procedures to ensure compliance with policy and documentation of inspection activities.

Observation: SCDJJ Policy I-3.3 Inspection of Facilities and Buildings for Safety and Sanitation and SCDJJ Policy G-9.3R, addresses some security areas along with other areas on the complex. The recommendations will specify additional security related items to augment the current policy.

Recommendation: Each security inspection report is reviewed by the Security Administrator and action taken as appropriate to the needs identified. Inspection reports are maintained at least 30 days.

Recommendation: All perimeter fences, buildings, walls, windows, doors, and drainage pipes (over 10 inches wide with steel grating), which are on or adjoin the perimeter, are...
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

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.

**Observation:** Confinement Control Center Door control panel requires maintenance. The light indicators for open/closed doors does not indicate whether doors are closed completely. Requires cost analysis

**Recommendation:** Assure all door indicator lights are repaired for staff safety. They should know the system is sound or hand check every door upon closing to assure locked.

**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,
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.

Observation: None of the vocational training shops had
written
inventory of their tools. Also,
not all of the tools were shadowed on shadow boards as required. The exception was in the
carpentry shop. There was no etching on any tools in all of the shops. Not all tools were
color-coded
and some were present on shelves in shops, there was no tool check out/in in any
shops.

Recommendation: A perpetual inventory of all tools, and sub
inventory in areas where
there are numerous tools, is maintained by each shop.

Observation: The Vocational Framing Shop has numerous spare glass sheets and broken glass
pieces unsecured on floor along wall. This could be a safety hazard as well as be used by
juveniles as a weapon.

Recommendation: For safety, security and item control purposes, place all glass sheets
and pieces in secured area until there is a need for use.

Observation: Horticulture Shop has a large concrete area outside in back of shop with varied
equipment and items lying around. There was 75 feet of drip line hose lying on ground
accessible to juveniles and could be used as escape device. There was 50’ of hose unsecure and
not accounted for outside and many scraps of varied types of mater
ial.
The entire area was dirty and littered.

Recommendation: Secure all items such as hose, drip line and other items that could be
used for escape in a secure tool room inside shop. Consider removing all items not
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.

Industries Upholstery Shop
Observation: This area is crowded, disorganized and in our opinion, creates a safety risk to staff and juveniles. There were tools in a cabinet, some tools were shadowed. We observed tools lying around unsecured and unsupervised. When we looked for a tool sign out sheet none could be located. Tools or equipment were not checked out.

Young Craftsmen and Bowl Room Shops
Observation: Same as Vocational Shops, no inventories, disorganized, no check out/in of tools to juveniles, no identifying etching on tools in either room or shop. No compliance with DJJ Tool Policy. Rooms are dirty, especially the bowl room. There is a distinct bad smell when you enter the shop.

Recommendation: Re-organize, create tool control system, routine and frequent tool inventories for the areas. Ensure supervisors and staff are very familiar with tool control policy and incorporate revisions to the department policy when necessary.

Medical Department/Infirmary
Observation: The syringes and sharps (scalpels) are not inventoried or accounted for on a daily basis. There is no process designed to provide accountability of these items.

Recommendation: Inventory all syringes and sharps in supply room, lab, and exam rooms to assure accountability. These should be on a perpetual inventory.
Observation: There is a set of keys to every door in clinical infirmary area to include outside doors. This key ring is maintained in an open drawer in nurses’ workstation with no doors leading to this area from infirmary. The key ring also has an identifier tag which tells which key goes to what door.

Recommendation: Remove key ring from unsecure drawer, unsecure area to either a locked area, or re-visit the idea of having keys to all room and outside doors in that area; with exception of a key on key rings of those staff who require access to those areas.

Food Services Observation: Knives are not being secured to working surface according to one staff. Lanyards are available for knives to be secured to work areas. Category 1 and 2 tools were not all inventoried and not all shadowed. There were Category 3 and 1 and 2 in drawers with no accountability. There were many new and used knives in the manager’s file cabinet for use in another area. None of these knives were on an inventory.

Recommendation: Knives used in food services area should be fully cabled at the area the knife is being used.

Recommendation: Conduct routine and frequent tool inventories for the areas. Ensure supervisors and staff are very familiar with tool control policy and incorporate revisions to the department policy where necessary.

Observation: The food preparation area is small and cramped. There were four kitchen staff and 6-7 female offenders from the adult prison working in the prep area. The office area was overcrowded and not organized. There were a great number of boxes stored in the office. We were informed, some of the boxes belonged to other departments.

Recommendation: Establish an area outside of food services operations for package deliveries, management and storage.

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.

**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**
To prevent the introduction of contraband during visitation, prevent the utilization of the process to effect escape and to maintain a visiting atmosphere that is safe and comfortable for all visitors.

When approved to visit, and before being permitted into the visiting areas, all visitors are subject to a “hand stamp/black light”, biometric or other equally effective identification procedures to augment picture ID confirmation prior to exit from the facility. Visitors and their belongings are searched thoroughly before being allowed to pass through the secure perimeter. Any items allowed in the visiting room (diaper bags, purses, etc.), are carefully inspected by security staff before the person is allowed into the visiting room.

**Observation:** The audit team did not audit the visiting program while visitors were present due to a scheduling conflict however, the team met with staff assigned to the main entry post. We found SCDJJ Visiting Policy G-9.42 to be a comprehensive clearly stated and well written policy.
During the staff interview, the team inquired about the visiting exit process. We were informed there is not a process in place to augment or reaffirm the identity of those who are exiting.

**Recommendation:**
SCDJJ implement an additional identification procedure to further identify and verify those who are exiting the visiting area.

**Observation:**
BRRC doesn’t have technology at the entry post to ensure carry in items such as food, diaper bags etc. are thoroughly searched.

**Recommendation:**
Add an x-ray system to enhance the searches of authorized items into and out of the visiting area to enhance control of introduction of contraband. 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.

**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.

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Adult Offender Transportation

Observation: During the security auditing process, while in the food service area, we observed female adult offenders working in the food preparation area. When we inquired as to how the offenders were transported, food services staff who are civilians transport the female offenders daily from and back to the Adult Correctional Facility adjacent to the BRRC via public roads.

Recommendation: It is our recommendation the practice of transporting Adult Female Offenders with non-certified correctional staff is not allowed. That all transports of this nature are conducted by certified correctional officers or the SCDJJ police.

Contractor Services

Observation: We observed a contractor working outside the confinement unit. The contractor's pickup was unsecured, cell phone and hack saws were in the cab of pickup, numerous dangerous tools, gasoline etc. in the pickup bed. The contractor had no inventory for tools, equipment or hazardous chemicals and reported had never been asked to provide one. The front gate did not ask for one, or list/count tools when they enter or leave at end of day. Certainly many of the items in truck were contraband if youth accessed them.

Recommendations:

1. DJJ create policy, SOP and standardized tool inventory form for all contractors to complete before they come in. Assure all contractors have a lockable tool bench box on pickup to store all hazardous tools and keep tools not used locked unless in use. Assure they are required to lock and disable their truck inside by using steering wheel lock or disable in another way. Additionally, recommend a correctional officer is assigned to escort and stay with contractors when they are on-site providing services.

2. Policy language should specify the procedure for tools, equipment, chemicals etc. inventory and management. Main vehicle gate must check all tools on list and assure no more than what is listed is brought in. Gate must check at end of day upon egress to assure all tools and equipment are accounted for.
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
Observation: While visiting the Inspector General’s Office (IG), we were informed that the monitoring of staff radio duress alarms occurs in the IG’s office area by civilian staff identified as Central Control. We further understand that there is no radio issuance tracking or accountability system that informs who has what radio and its location. When a duress alarm occurs, an “all call” is initiated and instructs staff to check their radio for an unintentional duress call.

Recommendation: A department policy be created to address personal alarms and duress alarms. Within the policy there will be specific procedures addressed for the process of responding to and clearing all alarm notifications.

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

To provide secure and efficient contact with staff in and outside the institution and law enforcement agencies to facilitate effective supervision of juveniles and ensure the health, safety, and security of staff, juveniles, and visitors and protection of the community.

There is written policy that establishes responsibility for radio assignment for each person/post in the communication network and for supervision and maintenance of communication equipment and operations.
All communication equipment, including duress alarms and emergency telephone systems, is tested at the beginning of each shift from the post/area from which they will be used.

Observation: SCDJJ does not have a department policy that addresses this objective however, the practice is every security officer and post is issued a radio.

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.

Observation: There are two cameras located in the corridor of the school one for each direction. There are three intersections where no cameras exist. They are the Main Entry, Auto Mechanic, Building Construction and JROTC.
Recommendation: Cameras be installed at the above intersections for total monitoring of the corridor areas.

Recommendation: That all cameras located at the school have the capability to be monitored locally and centrally.

Observation: Within each classroom there are emergency notification button installed in a certain location on a classroom wall. The location of the emergency button in some instances are located in areas that could be difficult to reach given a previous recommendation for placement of the teacher’s desks. All teachers and school administrators however, are issued a CP Motorola 200 radio that operates as an internal radio system for the school.

Recommendation: Require and issue to all who work at the school a personal alarm.

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)

Observation: SCDJJ Certified Police Officers carry OC while on BRRC for non-lethal use of force response when necessary. Non-Certified SCDJJ Police Officers are not authorized to carry OC on BRRC until certified.

Recommendation: Ensure certified SCDJJ Police officers are available for immediate emergency response.

Recommendation: SCDJJ consider authorizing issuance of Oleoresin Capsicum (OC) for trained certified correctional officers in department policy and SCDJJ Police for non-lethal force for the specific purposes of, self-defense and, to stop or impede violent acts. OC is easy and safe to deploy, it is effective at reasonable
distances as well as close range, and does not require physical exertion. OC also can be deployed while utilizing a handheld radio.

If approved the department policy should include at a minimum the following:

- Development of department policy with strict procedural and use requirements
- Who is authorized to carry OC
- Training and certification requirements
- Recognition of desired effect of OC
- Decontamination procedures
- Video recording when applicable
- Use of Force reporting and review

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:** BRRC 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**

**Observation:** During our security audit of the perimeter fence, we noticed the fence did not have a perimeter detection system or camera system.

**Recommendation:** A fence detection system be installed on the complex’s single fence configuration which will provide notification on escape and intrusion attempts. 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

**Observation:** Staff, guests and vendors do not undergo a routine and thorough personal search and a search of their carry in items prior to entry onto the complex. SCDJJ does not currently have a department policy that establishes this requirement as a control measure to reduce the introduction of contraband onto the complex.

**Recommendation:** The department adopts policy and procedure for routine searches of staff, guests and vendors and their personal carry in items upon entry onto the compound. Recommend SCDJJ identify a location where the searches would occur. The staff search procedures could include: an E-Scan or X-ray for carry in items, requirement for all staff to clear a walk thru or hand held metal detector. For uniformed staff utility or work uniform, consider cloth badges and rank insignia in order to expedite the entry clearing process. Requires cost analysis.

### Staff Supervision

**Observation:** During our time at BRRC, 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: SC DJJ 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.