

Policy Title: Access Control Policy # 800

Date Issued: January 2013

I. POLICY:

It is the policy of the Southern Poverty Law Center to maintain workspace that is safe and secure from threats and violence by controlling access to its building and surrounding grounds.

II. PURPOSE:

To establish guidelines for SPLC employees and other personnel and visitors when granting and controlling access to SPLC facilities.

III. PROCEDURE:

A. Pre-Announcements

All persons who are to be granted access must be preannounced to the security controller prior to entry. Preannouncements may be made by e-mail (pre-announcements@splcenter.org), in person or over the phone by current full or part time employees.

- 1. Preannouncements should be made as far in advance as possible and should contain the following information:
 - a. First and last names, as well as initials and titles such as Dr., Captain, Sr., etc.
 - b. Date and time of visit
 - c. Person(s) and places to be visited
 - d. Purpose of the visit
 - e. Expected duration of the visit
 - f. Name of escort official if different from person to be visited
 - g. Make, model, color of vehicle (if known)
 - h. Parking Instructions

Visitor parking is granted on a first come basis. If in-building parking is not available, guests will need to make other arrangements. Guest parking is not guaranteed.

2. Simultaneous preannouncements:

Although not the preferred method, preannouncements may be accomplished at the time of the visit. The same information is required as when the preannouncement is made in advance. Security personnel must have sufficient information upon which to grant the escorted access.

3. Vouching for immediate family members:



Spouses, significant others and children of employees may be "vouched" for by the employee. This is an abbreviated preannouncement process, in which the employee either calls the security station, or stops on their way into the garage, and announces the family member to the on–duty security controller. The family member will be signed in and issued a Visitor badge. Upon termination of the visit, it is the employee's responsibility to notify the security controller and turn in the Visitor badge.

4. Vouching for Others:

No SPLC employee is permitted to "vouch" for anyone other than an immediate family member. All other visitors must follow the prescribed access control procedures. For example, a Department Head just finished a business lunch with a prospective employee (or close friend) who is riding in his/her vehicle. This person must be preannounced by the Department Head and properly identified using a picture ID before they can be granted access under the escort of the Department Head, unless admitted through the expedited entry process.

5. Denied Entry:

If a visitor arrives that has been preannounced but the officer cannot make contact with the SPLC employee that made the preannouncement, the visitor will not be granted access to the facility. The visitor will be advised that their escort is unavailable and that they will have to schedule another appointment. Security will send an email notifying the SPLC employee that their preannounced visitor was not granted access and why. For this reason, it is essential that a Security Staff Member be notified before the visitor finds him/herself in a situation where access is denied.

B. Escorted Access

- 1. Escorted access may be granted to individuals who have a legitimate need to be in SPLC secure facilities, but who do not warrant the authority to move about freely in the facility without an escort.
- 2. Those with escorted access must be under the direct supervision of a full or part time employee as defined in the employee classification policy or other designated escort when in our facilities.
- 3. Criteria: In order to be granted escorted access, the visitor must:
 - a. Have a valid need to enter the facility for a specific purpose and narrowly defined time period.
 - b. Be preannounced to the on-duty security controller in the SOC, or Lobby, (see note on Preannouncements)
 - c. Agree to remain in the physical presence of their escort official at all times.
 - d. Submit themselves, their hand-carried possessions, and vehicle to entry point searches for weapons or other dangerous materials.



- e. Present a valid picture identification card to the security controller in exchange for a visitor's card access badge. (Visiting family members of SPLC employees will not be required to produce or yield a picture ID to procure a Visitor's badge).
- f. Allow the security controller to maintain possession of their picture identification until the Visitor's card access badge is returned upon completion of their visit.
- g. Family members who are visiting SPLC employees are not subject to search.

C. Unescorted Access:

Due to the nature of our work, the design of our facilities and the threat level associated with the Southern Poverty Law Center, unescorted access will only be granted to a select group of people who have met certain criteria. To be granted unescorted access to SPLC secured facilities, personnel must have:

- 1. A reoccurring valid need to enter the premises
- 2. Signed consent forms for criminal history and personal background checks
- 3. Successfully cleared a background check performed by a Security Staff member.
- 4. Been photographed by the Security Department,
- 5. Been issued an SPLC card access badge,
- 6. Been briefed on their duties and responsibilities to enforce all applicable security standards and practices, including their duties as escort officials.

D. Limitations on Access:

A person granted unescorted access might have their access limited by:

1. Time:

A person with unescorted access may have access to the entire building. Their access may be limited to normal business hours only. This person would have Monday through Friday access, from 8am until 5pm.

2. Location:

A person with unescorted access may have access to the building 24 hours-a-day, seven days a week, but may only have access to a certain area of the building. For example, some employees will have 24-7 access to their floor, but their access card will not allow them to open doors in other work spaces after hours.

3. Time and Location:

Some people's unescorted access will be limited both by time and location. For example, a person authorized to conduct routine maintenance on our exercise equipment would only be granted unescorted access to the fitness area, and only during normal business hours.

E. Expedited Entry:

On rare occasions, when requested by a center executive or department head, the entry controller may expedite entry. (No vehicle or person search) This practice should be kept to an absolute minimum.



F. Vehicle Access:

Special procedures are required to grant vehicle access to the SPLC Parking Garage

1. Employee Vehicles:

Each employee will be issued an "active car tag" to be placed inside the primary vehicle they intend to drive to work.

- a. When an employee approaches the building in one of the two entrance lanes, they will pass within four to six feet of a pedestal-mounted vehicle car tag reader which will "read" their "active car tag".
- b. When the employee's car tag is read, the security system will lower the Delta Barrier anti-ram device and raise the traffic arm.
- c. As the employee's vehicle proceeds into the garage area, the second (interior) set of traffic arms is automatically raised.
- d. If a vehicle is exiting from the garage, the security system will momentarily suspend inbound traffic until the exiting vehicle is clear.

2. Visitor Vehicles:

- a. All visitors arriving in vehicles will stop at the pedestals mounted in one of the two entry lanes.
- b. Push the intercom button on the pedestal and announce his/her presence to the security controller.
- c. State his or her name, who they are visiting, the purpose of the visit, and when they are expected.
- d. The security controller will then check for a preannouncement and confirm that the person to be visited is both present and expecting the visit.
- e. If the visit is confirmed a security officer will conduct a vehicle search.
- f. When the vehicle search is complete the officer will direct the person to visitor parking.
- g. Once the appointment is confirmed and the vehicle search is complete, the controller will grant the vehicle access to the garage
- h. The visitor will be escorted to the SOC or lobby so that the visitor can be processed.
- i. Family members visiting SPLC employees will not have their vehicle subject to search.

3. Delivery Vehicles:

Delivery vehicles do not require preannouncement. Delivery vehicles will gain access using the following process:

- a. Back the delivery vehicle up to the loading dock exterior door, contact security via the intercom and face camera on the pedestal adjacent to the loading dock driveway.
- b. The security controller will notify a security staff member or an officer who will meet the delivery driver and grant access to the loading dock. At no time will an SPLC employee grant access or accept delivery without prior approval from security.



- c. Officers must positively identify delivery personnel prior to granting access. If the driver is not known by the officer then a valid picture ID is required before access is granted.
- d. All delivery vehicles will be searched inside and out prior to being granted access to the loading dock.
- e. Failure to provide picture ID or allow a proper search of the vehicle will result in a denial of access.
- f. Security officers will log in every delivery.

IV. GUIDELINES:

A. Definitions:

1. Applicability:

The procedures and practices outlined herein apply to all SPLC employees, visitors, guests, family members, vendors, maintenance personnel and service providers.

2. Acceptable forms of ID include:

- a. Valid Driver License
- b. Non-Driver ID cards issued by a government agency
- c. Passports bearing picture and identifying information
- d. Valid Military ID & valid Law Enforcement ID cards

(The Chief or Assistant Chief of Security must approve any other form of ID presented before the visitor can be granted access)

3. Access Defined:

For the purpose of this document, the term "access" shall refer to:

- a. The authority for a person or vehicle to enter or remain in an SPLC facility
- b. The act of a person or vehicle physically entering or remaining in an SPLC facility
- c. Access may be escorted, unescorted, limited, or unlimited

4. Donors:

An active donor is any person who has given a gift of any amount (financial) within the past twenty four months. Donors will *be escorted when in our secured facilities*. They will not be left alone or allowed to roam the building unescorted.

5. Employees

a. Full Time Employee

A person as defined by the employee classification policy and who has been issued a card access badge, has unescorted access to their assigned parking area, all common areas, their work area, and all occupied work areas of other departments. After normal business hours, in most cases access will be restricted to their assigned floor, common areas and assigned parking.



b. Part Time Employee:

A person as defined by the employee classification policy who has been issued a card access badge, have unescorted access to their assigned parking area, all common areas, their work area, and all occupied work areas of other departments. After normal business hours, access will be restricted to their assigned floor, common areas and assigned parking.

- c. Former Employees in Good Standing (do not appear on a restricted access list)
 - 1) Building access after normal business hours, holidays and weekends all former employees in good standing will require approval by one department head if they wish to access the premises.
 - 2) Entry during normal Business hours for former employees is permitted with the proper preannouncement.
 - 3) Former employees are prohibited from accessing any SPLC files, electronic or otherwise, without the approval of the Department Head.

d. Former Employees on a Restricted Access List

- Security will maintain a no-entry list for former employees whose access to the building is to be restricted at all times (normal working hours, holidays and weekends.)
- 2) Information regarding former employees whose departure was less than favorable will be included on a list which will be provided by Human Resources to Security. The restricted access list will be held in confidence by the Security Director.
- 3) If at any time an individual's building access privileges are restored, HR will notify Security and the individual will promptly be removed from the restricted access list.
- 4) If someone on the restricted access list wishes to enter the building, the department director and the director of security must approve. During their time in the building they must be accompanied by the supervisor or his/her designee. Former employees who are on the restricted list will require the approval of the department head and security if they wish to access any SPLC files, electronic or otherwise.
- 5) Human Resources will advise departing employees who leave under less than favorable circumstances that their continued access to the building will be limited and that he/she will need to get approval to re-enter. HR will also place a statement on the termination paperwork notifying employees who have restricted access of such conditions.

6. Family Member Visits:

A spouse, child, parent, aunt, etc. is a family member. Every family member who visits the SPLC office building will *always be escorted when in our secured facilities*. They will not be left alone or allowed to roam the building.



7. Group Tours:

A group tour is three or more people moving as one unit, who are walking, talking, etc. together. When a group visit is approved, all members of the group will always be escorted when in our secured facilities. They will not be left alone or allowed to roam the building unescorted.

8. Maintenance Personnel and Contractors:

Any person who infrequently conducts maintenance on the facilities or equipment, or is new maintenance personnel, will generally be escorted. A list of maintenance personnel authorized with unescorted access will be maintained in electronic record. All vendors, maintenance personnel, and other service providers are classified as contractors. Those who have been subjected to a background check, cleared by security, and have unescorted privileges checked on their record will be issued a card access badge. In addition, they will be granted unescorted access to areas of our secured facilities which pertain to their business. These personnel should restrict their movement within the building to the areas where they are authorized to work.

If contractors are observed in areas of the facility not pertaining to their work, security should be notified immediately. (i.e. the copier repair person should not be seen strolling through the Intelligence Project work areas or the employee parking lots.)

9. Service Providers:

Any person who infrequently services the Center, or is a new service provider will generally be escorted. A list of service providers authorized unescorted access will be maintained in an Electronic Record.

10. Vendors:

Any person who makes infrequent deliveries to the Center, or is a new vendor will generally be escorted. A list of vendors who have authorized unescorted access will be maintained in an electronic record maintained by the department.

11. Visitors:

Any person regardless of the purpose of their visit is considered a visitor. All visitors, regardless of the purpose of their visit, will be escorted. Visiting attorneys; dignitaries; past, present and potential clients; donors; former employees; and law enforcement personnel here on non-emergency business are all *escorted visitors*.

B. Deviations:

Security Officers are not authorized to deviate from established access control policies and procedures. When faced with a situation where an employee requests a deviation, or situation not clearly outlined in this and other operating instructions, officers must contact the Chief of Security or other security supervisors for guidance.

C. Employees should contact the Chief of Security or a Security Supervisor if they have any questions pertaining to SPLC access control policies and procedures.



V. REFERENCES: