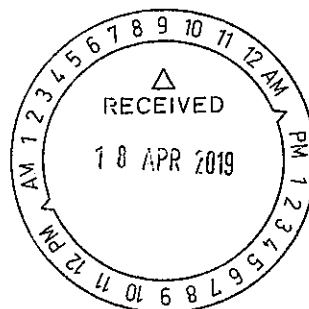




Minister for Emergency Services; Corrective Services

Our Ref: 65-07842



Hon Adele Farina MLC
Chair
Standing Committee on Public Administration
Legislative Council Committee Office
18-32 Parliament Place
WEST PERTH WA 6005

Dear Ms Farina

Thank you for your letter dated 14 February 2018 in which you requested a full and detailed update on the actions taken to date by the Department of Justice (the Department) in relation to all recommendations made by the Inspector of Custodial Services.

Due to the volume of recommendations dating back to 2003, the Department has provided the following reports as an interim response and will endeavour to provide the committee a full response to all recommendations made by the inspector since he commenced his role as soon as possible. The Department has provided the details of recommendations contained in the following Office of the Inspector for Custodial reports:

- Review of the Birth at Bandyup Women's Prison in March 2018;
- Report 114 – 2017 Inspection of Bandyup Women's Prison; and
- Report 93 – 2014 Inspection of Bandyup Women's Prison.

Please accept my sincerest apologies for the delay in obtaining the appropriate responses to your request.

As requested, please see below an outline of the status of the respective recommendations from the above reports and the actions taken against them.

It is acknowledged that the 2014 report (Report 93) overall presented a bleak overview of Bandyup and the women's prison estate, most notably referencing it as an overcrowded prison, with a complex prisoner profile, the management was ineffective and its operations were disorganised, the site was run-down, and the health and mental health services were inadequate.

Since 2014, the Department has made and continues to make a number of improvements to Bandyup and the women's prison estate, and a number of the previous recommendations do not reflect the current operational environment at Bandyup and across the women's estate.

In mid-2016 Melaleuca Remand and Reintegration Facility (Melaleuca) commenced operations as a maximum security prison for up to 256 women prisoners, operated by

Sodexo Australia Pty Ltd, easing population pressures on the women's estate and becoming the main reception facility for women.

This further enabled Bandyup to make improvements to its operations and infrastructure, which is outlined in further detail in the attached responses.

Also in 2016, the new Eastern Goldfields Regional Prison build included an additional 50 bed women prisoner unit, and 6 mother-and-babies purpose built cells.

In August 2018 Wandoo Rehabilitation Prison was reopened as WA's first specific drug rehabilitation prison for women. Previously a men's prison, it was brought back into public hands and refurbished. It holds up to 77 specifically selected women prisoners aimed to target their drug addictions and reduce drug-related offending.

The Therapeutic Community program approach is evidence-based and considered best practice with regard to assisting people with ongoing drug addictions. The program has already been successful and in February 2019, 10 women celebrated their graduation from the six-month Therapeutic Community program run with Cyrenian House, two of whom were Aboriginal. There were another 4 women that received stage completion certificates, 3 of them being Aboriginal.

The Department is currently developing a long term custodial infrastructure plan for Bandyup which, among other things, gives specific attention to the demands of the female estate. It places a focus on the health and mental health needs of women prisoners and is involves the development of a subacute unit at Bandyup.

The Department has created a new Directorate dedicated to the management of women and young people. This new Directorate is headed up by a Deputy Commissioner Women and Young People.

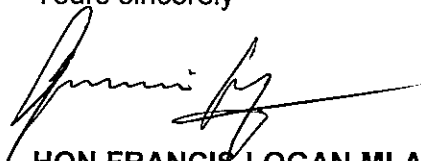
September 2018 saw the establishment of a Service Agreement between The Department of Communities and the Department of Justice for a Senior Child Protection Officer to work between Bandyup Prison and Boronia pre-release centre for Women. This position also provides assistance on request to Wandoo Rehabilitation Prison.

The Commissioner has given approval for the creation of a new position at Bandyup Prison-Manager Family and Children Services, which is in line with an existing position at Boronia Pre-release Centre for Women.

Boronia Pre-release Centre for Women has revised its accommodation plan to increase accommodation options for women with residential children and pregnant women.

If you require any further information, please do not hesitate to contact me or my office.

Yours sincerely



HON FRANCIS LOGAN MLA

MINISTER FOR EMERGENCY SERVICES; CORRECTIVE SERVICES

11 APR 2019

Att.

Recommendation 1

Increase the accommodation for pregnant women and mothers at Bandyup

Department's Response:

While the Department acknowledges the value of mothers and babies residing together, it is required to manage prisoners with multiple and complex needs. A scope of work is currently being confirmed to equip a third house for accommodating mothers and residential children at Bandyup, while allowing for fluctuating population demands. Unit 6 has been designated for accommodation for pregnant women. This is a single story unit with air-conditioned cells and in cell shower facilities.

Actions Taken:

- Houses 9 and 10 in Unit 5 are currently equipped to accommodate mothers and babies. These houses are air-conditioned. A third house (house 8) is being considered for fitout and possible use for accommodating mothers and residential children at Bandyup. Air-conditioning for this house has been approved and the procurement process is underway.
- Unit 6 remains the designated accommodation for pregnant women as this is a single story unit with air-conditioned cells and in cell shower facilities.
- Boronia Pre-release Centre for Women has revised its accommodation plan to increase accommodation options for women with residential children and pregnant women.
- The Bandyup Child Care Committee meetings are occurring fortnightly ensuring any issues identified are addressed promptly.
- Addressing the needs of women prisoners is a priority for the Department and plans to enhance the women's estate forms part of the Department's Custodial Infrastructure Plan. This is subject to budget submissions and Cabinet approval.

Level of Support: Supported

Status: In progress

Recommendation 2

Build an infirmary in the women's prison estate

Department's Response:

The Department has further progressed development of the Custodial Infrastructure Plan and will include options to incorporate an infirmary facility for the female estate in this planning process. Recurrent operational as well as capital funding will be required.

Actions Taken:

- As per recommendation 1 above, the Department continues to focus on the health and mental health needs of women prisoners and more broadly the women's prison estate through the Department's Custodial Infrastructure Plan.
- A budget submission for a subacute unit at Bandyup is with Cabinet for consideration and the result will be available upon release of the budget in May 2019.

Level of Support: Supported in principle
Status: In progress

Recommendation 3

Implement a strategy for addressing the culture at Bandyup to improve staff response to distress and pain management

Department's Response:

Bandyup is providing trauma informed training to all staff. The objectives of this training include assisting staff to promptly identify trauma and support required, and ensure that prisoners feel safe. Bandyup has also provided training sessions to staff regarding professional standards, integrity, working as a team, and communication. Last year, the Department also introduced training for trauma informed approaches into its entry level training package, and will continue to provide this to all new prison officers.

Actions Taken:

- Bandyup continues to provide trauma informed training to all staff, including to new prison officers as part of the Entry Level Training Program (ELTP). The objectives of this training include assisting staff to promptly identify trauma and support required, and ensure that prisoners feel safe.
- Trauma informed assessment practices and patient handover processes have been reviewed and changes implemented by Health staff. Policies and procedures relating to documentation of health information and alerts have also been reviewed.
- Trauma training is ongoing and incorporated into Family and Domestic Violence training and Working with Female Offenders. Training delivered as at end February 2019 includes:
 - Working with Female Offenders: 80.2% of staff trained
 - Family and Domestic Violence (FDV): 24.8% of staff trained.
- The FDV training is provided by Programs Specialist Service Unit. Three sessions have been scheduled through March / April 2019.
- Professional Standards Division is working with Bandyup staff on integrity, team work and communications training. Currently a team building day for Senior Officers is being organised, which will incorporate professional standards, team work, consistency, accepting responsibility and communication skills.

Level of Support: Supported
Status: In progress

Recommendation 4

Log all cell calls as required by local order 24

Department's Response:

A Superintendent's Notice was issued as a result of this incident to remind staff regarding the requirement to log all cell calls and ensure information is correct.

Monitoring and Compliance will incorporate an audit of cell calls into their Compliance Review activities.

Actions Taken:

- A review of cell call processes has been completed and staff trained to ensure they respond appropriately.
- Emergency access to cells during night lock has been improved through the installation of key lock boxes in units.
- A Superintendent's Notice was issued to remind staff to log all cell calls and ensure information is accurate.
- The Monitoring and Compliance branch conducts audits on cell calls as part of their compliance review activities and report any issues to the Performance Assurance Risk and Audit Committee.

Level of Support: Supported

Status: Complete

Recommendation 5

Implement strategies to ensure staff on night shift have the skills and confidence for the role

Department's Response:

In line with the outcomes of the Department's review into this incident, Bandyup has commenced implementation of the following:

- The night Officer In Charge will be based within Unit 2, providing a senior presence and point of call for staff;
- Radio Code training for staff;
- Staff to work a set number of days shifts per roster, to ensure training and skills are current;
- Senior Officers to ensure that all staff are rotated through the night shift to ensure they are given the opportunity to work in all operational areas and units;
- Ongoing training for emergency response and reporting requirements.

Whilst nursing staff are not required to have a midwifery qualification, they are aware of the limitation of their scope of practice. A clear instruction has been issued that any unscheduled presentation of a pregnant woman (at any gestation and for any symptom) is to be discussed with a GP or with the unit at KEMH..

Actions Taken:

- Completed as per response.
- Actions taken form part of existing operating practices and business as usual activities.

- In addition, Bandyup has reviewed the rostering system, night shift duties and handover processes, particularly relating to prisoners with health risks for close monitoring and appropriate response as required.
- Training in emergency response and operational orders was delivered in April 2018 and November 2018, with further refresher training scheduled for August 2019.
- Entry control training for new officers has now been included in the two week orientation training with refresher training available upon request.

Level of Support: Supported

Status: Complete

Recommendation 6

Improve incident reporting and classification

Department's Response:

The Department acknowledges issues in relation to the accurate and timely classification and reporting of this incident. Corrective Services Prisons Order 10/2016 sets out the primary details that are required to be reported to the Operations Centre when providing verbal incident reports and briefs, which allows a proper classification assessment to take place against the categories of Critical Incidents as described in Policy Directive 41. Corrective Services will conduct a familiarisation campaign utilising '10 Questions' required to provide a complete and correct incident brief. This will reinforce the importance of accuracy in reporting to all prison based staff and allow for the timely and correct categorization of incidents. With regard to prison based reporting, senior management at Bandyup (Principal Officer and Asst. Super Operations) will ensure ongoing training and compliance to support accurate reporting. Principal Officers will undertake quality assurance of all incident reports daily, and provide information sessions to Senior Officers to reinforce reporting requirements.

Actions Taken:

- Completed as per response.
- Actions taken form part of existing operating practices and business as usual activities.
- In addition to a focus on improving incident reporting across the Department, the Department's Internal Audit team has included test on incident reporting control. This will include sampling incident reports assessing compliance to policy and procedure and a walk through (qualitative assessment) of the physical spaces used within facilities to complete incident reports (IDRs).

Level of Support: Supported

Status: Complete

Recommendation 7

Implement strategies to ensure prisoners feel safe at Bandyup

Department's Response:

The Department agrees it is essential that prisoners feel safe at Bandyup, and all other facilities, and there are processes in place to assist with this. Prisoners can report any concerns to various business areas within the Department such as ACCESS (complaints system), Prisoner Counselling Services etc. as well as to external parties for consideration and action e.g. State Ombudsman, Independent Visitor Service, Inspector of Custodial Services, etc. With regard to the effects of this incident, while the report states that it is unlikely the Department gave sufficient support to those affected by the birth, prisoners within the unit were offered assistance from the Prison Counselling Service. As outlined previously Bandyup is providing trauma informed training to staff. The objectives of this training include assisting staff to promptly identify trauma and support required, and ensure that prisoners feel safe.

Actions Taken:

- Completed as per response.
- Actions taken form part of existing operating practices and business as usual activities.
- In addition, better synergies and communication protocols have been developed across the multidisciplinary teams at Bandyup to ensure better handover processes are implemented and staff are informed of relevant health matters relating to a prisoner.

Level of Support: Supported

Status: Complete

Report 114: 2017 Inspection of Bandyup Women Review of the birth at Bandyup Women's Prison in March 2018**Recommendation 1**

The Government should ensure funding for necessary infrastructure upgrades at Bandyup. Priorities include Unit 1, the Health Centre, Visits, and Reception

Department's Response:

The Strategic Asset Plan is currently being updated to address current and future needs. The Department is also drafting a robust service delivery based Custodial Infrastructure Plan to provide capacity in the male and female estate. This includes options for the future expansion of Bandyup Prison. However this recommendation is dependent on the necessary funding being provided.

Actions Taken:

- The Department's long term custodial infrastructure plan includes plans for Bandyup and the overall women's estate. This plan is part of the

Department's Strategic Asset Plan and is subject to budget submissions and Cabinet approval.

- In the interim, additional beds have been installed at Bandyup and improvements to infrastructure made where possible.

Level of Support: Supported in principle

Status: In progress

Recommendation 2

Stabilise Bandyup's management team and progress the change management review

Department's Response:

The Department acknowledges that continuity of senior management teams is important, however, professional development and succession planning is also essential. Whilst professional development opportunities have caused a change in the management team, the structure continues to be stable with the majority of staff being existing experienced Bandyup staff members. The daily operations are settled and stable. Work continues on the implementation of the change management review.

Actions Taken:

- Bandyup's management team has been stable for some time, and includes staff members with significant experience at Bandyup. This includes the appointment of substantive Superintendent Wade Reid since August 2013 and Superintendent Andrea Bowen since April 2018.
- Operational aspects of the change management review have been implemented. Infrastructure changes that require significant budget appropriation have been referred for inclusion in the Department's custodial infrastructure plan.

Level of Support: Supported in principle

Status: In progress

Recommendation 3

Improve professional appraisal processes and staff training on their use.

Department's Response:

The Department has commenced a review of the current Performance Appraisal and Development System. Following this review, the Department will identify and determine the training need, training product development and associated funding requirement.

Actions Taken:

- The Department's Performance Appraisal and Development System is currently in operation and incremental improvements made as part of continuous business improvement activities.

Level of Support: Noted
Status: Complete

Recommendation 4

Ensure that all Vocational Support Officer (VSO) positions are filled and that VSOs are adequately trained.

Department's Response:

The process to fill funded VSO positions is an ongoing Department initiative. The Academy has reinvigorated the ETP and has delivered two training programs in the current calendar year with plans of ongoing courses.

Actions Taken:

- ETP (Essential Training Program) for Vocational Support Officers (VSO) is now part of the Department's training calendar scheduled for delivery each year.

Level of Support: Supported
Status: Complete

Recommendation 5

The textiles workshop should produce a small range of maternity wear for expectant mothers.

Department's Response:

Bandyup's textile workshop will commence production of a small range of maternity wear for expectant mothers. Bandyup has filled a vacant VSO position and production of maternity wear has commenced. Maternity shirts now form part of Bandyup's standard textile production. Bandyup currently stocks 10 of each size (ranging from XS to 3XL), and are continuing to add to stock.

Actions Taken:

- Bandyup has filled a vacant VSO position and production of maternity wear has commenced. Maternity shirts now form part of Bandyup's standard textile production. Bandyup currently stocks 10 of each size (ranging from XS to 3XL), and are continuing to add to stock.

Level of Support: Supported
Status: Complete

Recommendation 6

Introduce regular family day visits for extended family members as well as children.

Department's Response:

With the decreased numbers at Bandyup the reintroduction of family day visits broken down into individual cohorts (space specific) may be revisited.

Actions Taken:

- Bandyup has not maintained a decreased population since the opening of Melaleuca Remand and Reintegration Facility as anticipated. However, Bandyup recognises the importance of family relationships, and has held family visit days where possible, taking into consideration operational requirements whilst maintaining safety and security of the prison. The family visit days are received well and provide a family friendly environment for prisoners and their families.

Level of Support: Supported in principle

Status: Complete

Recommendation 7

Ensure prisoners have access to cheaper calls to mobile phones.

Department's Response:

Prisoner Telephony is listed on the ICT Transformation Roadmap, which will govern the Department's transition to GovNext ICT Services.

Actions Taken:

- The Prisoner Telephony system remains a priority on the Department's ICT Transformation Roadmap.

Level of Support: Supported in principle

Status: In progress

Recommendation 8

Expand accommodation for mothers and their babies at Bandyup and/or Boronia.

Department's Response:

Recommendation superseded by Recommendation 1 from the Birth at Bandyup Women's Prison in March 2018 report.

Actions Taken:

- Refer recommendation 1 of The Birth at Bandyup Women's Prison in March 2018 report.

Level of Support: Supported in principle

Status: Superseded

Recommendation 9

Implement an improved orientation process as laid out in the Bandyup Review Final Draft.

Department's Response:

The Orientation Process that was documented in the Bandyup Review will be implemented once operational issues have been assessed.

Actions Taken:

- Bandyup has implemented the following to support the orientation process as proposed in the Bandyup Review:
 - The Unit Manager's office in Unit 4 is made available for prisoner interviews
 - A dedicated Orientation Manual is now available
 - Prisoners are provided with a copy of the manual and Peer Support Prisoners use the manual to explain processes at Bandyup
 - A map of the prison is provided as part of the manual; and
 - Information regarding employment, recreation activities/courses, and life skills is provided during the process.

Level of Support: Supported

Status: Completed

Recommendation 10

Revise case management practice at Bandyup using Greenough Regional Prison local case management committee as a basis.

Department's Response:

The case management model at Bandyup will be revised utilising the Greenough model as a basis.

Actions Taken:

- The standards for case management are clearly laid out in the Department's Policy Directive 51: Case Management (PD51) and Adult Custodial Rule 18: Assessment and Sentence Management of Prisoners (ACR 18).
- Bandyup and Greenough both conduct case management in line with these standards. AJS is assured that Bandyup is meeting its requirements in line with PD51 and ACR18, as outlined in the Assessment Monitoring Report (July 2018).

Level of Support: Supported in principle

Status: Completed

Recommendation 11

Increase therapeutic program delivery for female prisoners.

Department's Response:

Demand for Pathways and Choice, Change and Consequence (CCC) programs at Bandyup has been under review and the outcomes from this review will be looked at in the coming months in relation to the need for further programs. Offender Programs has been in discussion with the current Superintendent at Bandyup to identify further suitable room space to deliver programs, which will enable an increase in the delivery of programs. These discussions will be ongoing. The new suite of rehabilitation and reintegration services, as a result of the recent procurement process, will be gender specific and culturally appropriate. The new services commence on 1 April 2018.

Actions Taken:

- There is ongoing demand for therapeutic treatment programs. Corrective Services has since opened Wandoo Rehabilitation Prison to further meet this demand. Additionally Quarter 1, 2019 saw programs allocated to prisoners with identified need (i.e. prisoners requiring programmatic intervention).

Level of Support: Supported

Status: Completed

Recommendation 12

Apply security procedures consistently and thoroughly.

Department's Response:

It is the expectation of the Department that all facility staff adhere and apply correct security procedures. The Bandyup management team have updated Gatehouse Security procedures and will reinforce expectations and provide support where required to ensure compliance with Department policy and procedures.

Actions Taken:

- Completed as per response. In addition, the Corrective Services Monitoring and Compliance branch conducts compliance reviews to ensure compliance with relevant operating policies, procedures and service agreements.

Level of Support: Supported

Status: Completed

Recommendation 13

Embed the scheduled day model into TOMS and offer it at all prisons holding women.

Department's Response:

This is no longer required as Bandyup are reverting to the standard Gratuities system that already exists in TOMS. The scheduled day model is being reviewed but will not be directly linked to the Gratuities module.

Actions Taken:

- No further actions to report.

Level of Support: Not Supported

Status: Closed

Recommendation 14

Introduce section 95 for minimum-security women at Bandyup.

Department's Response:

There are approved section 95 programs at Bandyup. At present there are no suitable approved prisoners to undertake these activities. Prisoners are being

assessed for suitability, however the changing population reduces the capacity to maintain a work party.

Actions Taken:

- No further actions to report.

Level of Support: Supported

Status: Closed

Recommendation 15

Ensure health care staff are retained and adequately resourced to develop a holistic women-centric model of care at Bandyup

Department's Response:

The Department of Justice is reviewing the current model of care provided at each of the health sites. The aim is to transition to an evidence-based nurse led model of primary care that ensures better health outcomes for patients and a supportive structure for staff.

Actions Taken:

- Monthly nursing webinars are conducted through video links across the service where nursing staff present education sessions- incorporating both mental health and general health topics. This reflects the "lunch and learn" peer education sessions in the wider health provider organisations. Training includes trauma informed care.
- As part of health services quality plan and audit calendar, all site nursing staff are invited to participate in various QI /Evaluation /audits. An infrastructure review/audit has been completed by a health architect commissioned to complete this as part of the "Justice Health Project". This work was completed in December 2018. The objective was to assess the adequacy of the facility and design against current standards and guidelines and identify work required to meet compliance. The outcome of the report and associated recommendations will be reviewed by the department. A business case has been developed to provide a mental health subacute facility and service. This awaits consideration as part of the 2019/20 budget.

Level of Support: Supported in principle

Status: In progress

Report: Report 93 - 2014 Inspection of Bandyup Women's Prison

Recommendation 1

The Department should ensure that Bandyup Prison's practices and procedures align with Departmental strategic policy documents relating to women in prison, and that all its employees are aware of its core values and expectations. There should be an action plan to address deficiencies.

Department's Response:

The Department will review its strategic policies and frameworks with respect to the management of women prisoners and ensure that the practices and procedures at Bandyup are aligned. Performance and evaluation practices will also be included in the review in order to effectively monitor the women prisoner's policy framework.

Actions Taken:

- Ongoing communication at a range of levels through debriefs and town hall style meetings take place in relation to Bandyup and its strategic direction.
- The structure of local executive meetings has changed to include development for the management team. These meetings provide opportunity for a more strategic focus to addressing issues.
- Communication and consultation has commenced in relation to the new operating model for Bandyup through working groups and communication with the Union and its delegates.

Level of Support: Supported

Status: Completed.

Recommendation 2

The Department institute a 'lessons learned' exercise arising out of events at Bandyup in 2012 and 2013 to ensure that, in the future, appropriate, timely, and effective corporate support is given to prisons.

Department's Response:

The Department's reform agenda includes a lessons learned program, which involves reviewing incidents and events, evaluating responses and follow-up actions. A lessons learned program will be considered to discuss the events of 2012 and 2013 at Bandyup.

Actions Taken:

- As per the Department's response.
- Lessons learned forms part of critical incident reviews and continuous business improvements.

Level of Support: Supported

Status: Completed.

Recommendation 3

- a) The Department will review the current situation with a view to establishing a long term arrangement in keeping with the parameters of the current industrial framework.
- b) The management structure will be reviewed.
- c) In addition to the achievement of a) and b) the Department will implement an effective performance management framework to ensure that the Bandyup management team and senior managers are performing to the required standards.

Department's Response:

- a) The Department will review the current situation with a view to establishing a long term arrangement in keeping with the parameters of the current industrial framework.
- b) The management structure will be reviewed.
- c) In addition to the achievement of a) and b) the Department will implement an effective performance management framework to ensure that the Bandyup management team and senior managers are performing to the required standards.

Actions Taken:

- Bandyup's management team has been stable for some time, and includes staff members with significant experience at Bandyup. This includes the appointment of substantive Superintendent Wade Reid since August 2013 and Superintendent Andrea Bowen since April 2018.
- An OSH Industries position has been created to improve the overall management of Industries on site. During the overcrowding period since the last inspection gained approval for additional management position - to assist in addressing increased 'At Risk' prisoners at Bandyup. This has had a flow on affect in allowing the Superintendent to better meet the demand.
- Ongoing coaching is provided for the development of Bandyup staff. Superintendent portfolio meetings with staff are held on a regular basis. Staffing model will be revisited once again to align to the new operating model and the shift of prisoners to Melaleuca as part of ongoing continuous improvement.

Level of Support: Supported

Status: Completed.

Recommendation 4

Re-invigorate Bandyup's performance management system and procedures with an emphasis on developing relationship and communication skills, as well as improving the PADS system.

Department's Response:

The Department will thoroughly review and implement an effective performance management framework. This will ensure that the staff at Bandyup, including the management team, are performing to the required standard and receiving the appropriate support from head office.

Actions Taken:

- The Department's Performance Appraisal and Development System is currently in operation. The system allows for six monthly reviews and opportunity for ongoing feedback and support in relation to staff performance and training.

Level of Support: Supported

Status: Completed.

Recommendation 5

Improve Bandyup's focus on consistent customer service to visitors to the prison, and establish a community reference group to enhance accountability, communication and community involvement.

Department's Response:

The Bandyup Superintendent will lead the establishment of a diverse community reference group together with the development and implementation of a professional and consistent customer service framework to all visitors to Bandyup.

Actions Taken:

- Bandyup Assistant Superintendent has attended Boronia's Community Engagement and Advisory Group meetings to understand the level of engagement and topics discussed.
- Subsequent discussions were held with the City of Swans regarding similar opportunities that will change the way Bandyup interacts with the Community, this includes S95 activities for the Bandyup prisoners. These discussions and engagements continue.

Level of Support: Supported
Status: Completed.

Recommendation 6

Develop all unused space at the Bandyup site to maximise opportunities for recreation and relaxation and for personal and cultural development.

Department's Response:

The Department will establish immediate, medium and long term strategies to better identify and develop all unused and under-used space within the Bandyup site to maximise opportunities for recreation, relaxation and personal and cultural development. The Department will also consider opportunities external to the site.

Actions Taken:

- Walking track at Jackeranda park has been reinvigorated. Outdoor exercise equipment has been added to Jackeranda park. Further modifications to increase the grassed area completed including removal of sand volleyball area to create extra space.

Level of Support: Supported
Status: Completed.

Recommendation 7

Replace Unit One with appropriate, contemporary accommodation, and ensure that the new accommodation is designed to take account of key needs, including mental health.

Department's Response:

The Strategic Asset Plan was updated with a specific focus on the women's estate, to address current and future needs.

Actions Taken:

- Completed as per response.

Level of Support: Supported

Status: Completed.

Recommendation 8

Cease the practice of compelling women to sleep on floors.

Department's Response:

The Department is committed to cease the incidences of women sleeping on mattresses on the floor. The development of additional bed capacity strategies that have an immediate, medium and longer term benefit are being prioritised both within Bandyup and across the women's estate.

Actions Taken:

- As at Dec 2016 and over the previous two years Bandyup installed 126 new beds, scheduled for another 15 beds.
- Since June/July 2016 - no women have been sleeping on floors and unlikely to do so in the future.
- The situation has further eased with the new EGRP prison coming on line that houses additional women. Future planning of the women's estate and the opening of Melaleuca will further eradicate any concerns.

Level of Support: Supported

Status: Completed.

Recommendation 9

In order to reduce recidivism rates, and with due regard to risk, the Department should examine and implement measures to improve Aboriginal women's access to the better accommodation areas at Bandyup and to the re-entry opportunities presented by Boronia.

Department's Response:

Current practices will be reviewed, with a view to improving the hierarchal management of Aboriginal women prisoners at Bandyup, which will enable this cohort to access better accommodation and re-entry opportunities at Boronia.

Actions Taken:

- Since this recommendation, Corrective Services has implemented strategies to assist all women, both Aboriginal and non-Aboriginal at Bandyup to transition to Boronia pre Release Centre.
- These include: The hierarchical model applied to reflect the unique population profile of the site. For instance the waiting time to apply for earned supervision was halved from 3 months to 6 weeks, to better reflect the rapid turnover and short sentences that are experienced in a Remand and Receiving prison.

Level of Support: Supported

Status: Completed.

Recommendation 10

Ensure that Bandyup's regime and processes actively tackle issues of prisoner on prisoner bullying and better protect potentially vulnerable individuals.

Department's Response:

Bandyup reviewed their anti-bullying policy in order to address the issues raised.

Actions Taken:

- The anti-bullying policy for prisoners has been reviewed. The Superintendent personally counsels prisoners engaged in fights and are placed on a management plan.
- The new operating model for Bandyup in line with the Women's Standards will focus on keeping prisoners engaged in constructive activity through a revised daily routine, employment profile and gratuity profile.

Level of Support: Supported

Status: Completed.

Recommendation 11

Ensure that Bandyup is better resourced to meet the needs and legal entitlements of remand prisoners, including improved access to legal resources and improved opportunities for contact with lawyers.

Department's Response:

The Department is exploring how it support the needs of remand prisoners.

Actions Taken:

- Improved prisoner access to Lawyers through increased official visits and increased use of audio visual technology.
- At the Department level, Legal Aid has also been provided a list of contacts to facilitate prison visits, as well as the phone number for the Coordination Centre to be used for facilitating prison visits and to liaise directly with the facility concerned wherever possible.
- Also increased resources in the Legal Library e.g. books and computers.

Level of Support: Supported
Status: Completed.

Recommendation 12

Provide regular traditional foods for Aboriginal prisoners, and allow them to prepare and cook that food themselves.

Department's Response:

The Department is looking at the demographic profile of female offenders and is exploring their dietary requirements.

Actions Taken:

- Recommendation supported in principle. Where possible, traditional foods are prepared, including self-cooked meals taking into consideration the security and safety of staff, prisoners, visitors and the facility as a whole.

Level of Support: Supported in principle
Status: Completed.

Recommendation 13

Increase Prison Officers' responsibility for supervising unit activities such as food distribution and cleaning with a view to improving hygiene practices.

Department's Response:

The Department has clear expectations and responsibilities of all staff which form part of the Prison Officers Enterprise Bargaining Agreement 2013.

Actions Taken:

- Employed a VSO4 Chef Supervisor/Instructor to enhance supervision on food preparation and distribution including the hygiene of food handling.

Level of Support: Supported
Status: Completed.

Recommendation 14

Resource and implement a proactive, preventative maintenance program.

Department's Response:

The Department is committed to maintaining facilities and already has a comprehensive preventative maintenance program which covers all sites.

Actions Taken:

- Completed as per response.

Level of Support: Supported in principle.
Status: Completed.

Recommendation 15

Bandyup should develop a response to the recommendations contained in the Infection Prevention Consultant's report and implement an appropriate action plan.

Department's Response:

The recommendations contained in the Infection Prevention Consultant's report are currently being progressed and implemented by Bandyup. comprehensive preventative maintenance program which covers all sites.

Actions Taken:

- As per Department's response.

Level of Support: Supported

Status: Completed.

Recommendation 16

Improve relational/dynamic security at Bandyup, including a renewed emphasis on respectful relations and positive interactions.

Department's Response:

Bandyup is committed to implementing a renewed emphasis on respectful and positive interactions, in light of the observations provided within this report. All necessary adjustments to policy, procedure, behaviour and performance management will be made, complimented with frequent reflective and evaluation practices to ensure that relational and dynamic security are maximised.

Actions Taken:

- Development of management staff through constant communication, debriefs, standard processes and lessons learned.

Level of Support: Supported

Status: Completed.

Recommendation 17

The Department should ensure that when key security staff are deployed out of prisons, the positions are backfilled by appropriate staff.

Department's Response:

The Department will ensure that appropriately skilled staff are utilised when the backfilling of positions is required. Effective succession planning strategies for key prison management positions will be established.

Actions Taken:

- Key security positions are backfilled through ongoing advertising / EOIs and rolling through a number of staff to experience security rolls at Bandyup.
- In addition, the development of management staff is through constant communication, debriefs, standard processes and lessons learned.

Level of Support: Supported.
Status: Completed.

Recommendation 18

Improve control room processes and practices by rotating night shift officers through the control room position and ensure that staff in the control room are at all times fully focused on the task.

Department's Response:

A comprehensive review of control room staffing and work practices will be undertaken, taking into account the observations of this report and other benchmarks of good practice. All necessary changes identified to improve processes and practices, will be made.

Actions Taken:

- Officers are rotated based on availability of staff.
- New staffing agreements are being negotiated which will take into consideration resourcing requirements based on muster and the multi-skilling of staff.

Level of Support: Supported in principle.
Status: Completed.

Recommendation 19

For as long as drug detection dogs are used, the Department should ensure that they are available to cover all high risk periods in prisons. The Department should also actively pursue options based on non-invasive body screening technology.

Department's Response:

The Department's Drug Detection Unit has recently undergone an external review. Operational coverage for prisons will be greatly enhanced to ensure that high risk periods are covered by drug detection dogs.

The Department conducts continual research into emerging technologies for the use in prisons. Non-invasive body type scanning technologies will be considered.

Actions Taken:

- As per response.

Level of Support: Supported in principle.
Status: Completed.

Recommendation 20

In reviewing the 'structured day' at Bandyup, the Department should ensure that the principles of a women-centred philosophy are reflected in policy and firmed up in practice.

Department's Response:

The Superintendent has commenced a review of the 'structured day' at Bandyup to ensure principles of women-centred philosophy are reflected in policy and practice.

Actions Taken:

- Completed as per response. New philosophy developed in line with Women's standard and involves the delivery of trauma informed service delivery. The new philosophy will form the basis of the new operating model for Bandyup.

Level of Support: Supported in principle.

Status: Completed.

Recommendation 21

Bandyup management should continue to explore improved employment opportunities and, given the lack of investment in women's imprisonment over recent years, the Department should prioritise Bandyup's needs.

Department's Response:

Employment strategies within Bandyup will be reviewed to optimise the levels of meaningful employment. This will include the identification of 'work readiness' strategies to ensure prisoners maximise their opportunities for employment following their release from custody.

Actions Taken:

- Bandyup Women's Prison (Bandyup) has introduced a number of initiatives to increase the education, training and employment opportunities for prisoners. The Bandyup Training Pathways Hub ensures prisoners receive comprehensive education and training programs.
- Additionally over the last six months (from August 2018), Bandyup has been working on a project in conjunction with the Education Vocational Training Unit (EVTU) to refurbish the old laundry facility in Bandyup to build a hair and beauty salon. This will allow full training to occur in an area where post release employment outcomes are available.

Level of Support: Supported in principle.

Status: Completed.

Recommendation 22

In order to maximise opportunities for reducing recidivism, enhance the facilities and increase the resources at Bandyup for part time and full time education and training.

Department's Response:

The Department is committed to prioritising strategies aimed at reducing recidivism. The implementation of Individualised Integrated Case Management (IICM) will ensure all education and training opportunities are explored and maximised.

Actions Taken:

- As per response to Recommendation 21 above.

Level of Support: Supported.

Status: Completed.

Recommendation 23

Improve recreational activities for Bandyup prisoners, both during recreation time and as part of the structured day, and make better use of areas that are currently unused or under-utilised. As part of this improvement, provide more culturally appropriate recreation options for Aboriginal prisoners, including library materials and visits by Aboriginal elders.

Department's Response:

The Department will establish immediate, medium and long term strategies to better identify and develop all unused and under-used space within the Bandyup site to maximise opportunities for recreation, relaxation and personal and cultural development.

Actions Taken:

- A strong focus has been placed on expanding Structured day activities for Aboriginal and non-Aboriginal prisoners at Bandyup e.g. unit based prisoner recreation - increased recreation positions has resulted in more recreation activities - equipment, crayons, books have been supplied.
- Recreation planning occurs weekly and is formalised and distributed to accommodation units to inform prisoners of structured activities that are available

Level of Support: Supported.

Status: Completed.

Recommendation 24

Build a new social and official visits centre inside Bandyup, and also a new external visitors' centre for people arriving at the prison, in line with the Department's stated philosophy of women-centred service delivery.

Department's Response:

The Strategic Asset Plan is currently being updated with a specific focus on the women's estate, to address current and future needs.

Actions Taken:

- The Strategic Asset Plan was updated with a specific focus on the women's estate, to address current and future needs.

Level of Support: Supported.

Status: Completed.

Recommendation 25

Expand the bus service to and from visits at Bandyup to include access to earlier and more frequent visit sessions.

Department's Response:

The bus service was reviewed to ensure the timing issues are rectified. Should the service require significant expansion, and funding needs unable to be met by Bandyup, appropriate applications will be submitted.

Actions Taken:

- Recommendation supported in principle. Bus service is made available for visits based on demand.

Level of Support: Supported.

Status: Completed.

Recommendation 26

Taking full account of the best interests of the child the Department should take steps to facilitate appropriate family connections are maintained between young people in Banksia Hill Detention Centre and adult family members in Bandyup and other prisons.

Department's Response:

There is no 'blanket policy' denying contact between women and children in custody. Adult Custodial Rule 7 and Youth Custodial Standing Order 12 allow provision for visits between prisoners and detainees.

Actions Taken:

- Completed as per response.

Level of Support: Supported.

Status: Completed.

Recommendation 27

Restructure the afternoon routine to ensure that clashes between visits, recreation, medication, and canteen spends are reduced and that there is adequate staff monitoring and supervision during recreation.

Department's Response:

The afternoon routine is currently being reviewed to avoid the issues raised. New canteen times have already been introduced.

Actions Taken:

- Upon recognising this being an issue, an FTE for a canteen officer was sought and Approval granted.
- Spends are now structured on 8 to 4, Monday to Friday basis removing the clash with recreational activities.

Level of Support: Supported.
Status: Completed.

Recommendation 28

Overhaul the orientation process and ensure that each new prisoner has adequate support and is familiar with the prison and its operations before leaving the orientation unit.

Department's Response:

The orientation process is currently being reviewed at Bandyup in order to update the information contained in the handbook and DVD. The issues identified by this report will be considered in order to ensure each new prisoner has adequate support and is familiar with the prison and its operations.

Actions Taken:

- New Orientation process developed and implemented involving Peer Support Prisoners.

Level of Support: Supported.
Status: Completed.

Recommendation 29

Ensure that adequate resources are allocated to Bandyup to facilitate re-entry; revitalise the Transitional Manager's role; and re-introduce prison employment positions to assist the Transitional Manager.

Department's Response:

The Department will undertake a thorough review of the entire women prisoner's re-entry framework and provide all resource needs at Bandyup to ensure that prisoners leaving custody are best supported to successfully re-assimilate back into the community. The Transitional Manager role will be revitalised and once complete, it will then be possible to reintroduce the previous prison employment position.

Actions Taken:

- Transitional Manager has made a number of changes including the introduction of fortnightly roundtable meetings between Bandyup and the transitional service providers. This enables all parties to crosscheck caseloads and ensure services are not being duplicated.
- The regular contact has also improved rapport and understanding between both the service providers and the women. Prisoner employment positions have also been reintroduced. The Transitional Manager Clerk is typically a member of the peer support team, who has trust and rapport with both staff and other prisoners.
- This position assists women to complete often complex checklists which identify required services, and liaise between the women and the Transitional Manager. Monthly information sessions then link prisoners with service providers. This is a much improved system.

Level of Support: Supported.
Status: Completed.

Recommendation 30

- (a) Reintroduce the Nursery Coordinator position in order to deliver a more appropriate service to mothers with resident babies;
- (b) revise the Nursery Unit plans in order to provide up to date and accurate information; and
- (c) ensure all staff who work in the Unit 5/Nursery houses are appropriately trained and certified to work with children and babies.

Department's Response:

- a) The allocation of functions at Bandyup are being reviewed to ensure a more holistic approach is provided to mothers with resident babies.
- b) The Nursery Unit plans will be reviewed
- c) Bandyup will review the training requirements for staff working within the Nursery and ensure all necessary certifications are held by staff.

Actions Taken:

- a} The unit plans related to Child Care places at Bandyup have all been reviewed and are up to date.
- b} Responsibilities for the provision of services to the mothers with approved residential children have been outlined in the associated documentation
- c} Services to the mothers in the paediatric houses are provided by NGALA, Family Links and Unit Staff

Level of Support: Supported.
Status: Completed.

Recommendation 31

Update Policy Directive 10 to provide: (a) more flexible transfer criteria for pregnant women in regional prisons so that they not routinely moved to Bandyup at 20 weeks and that transfers are based on individual risk assessment; and (b) enhanced opportunities for children to have overnight or day-stays with their mothers or other carers in Bandyup, subject to appropriate risk assessments.

Department's Response:

The Department reviewed Policy Directive 10 and took into consideration the issues raised.

Actions Taken:

Completed as per response.

Level of Support: Supported.
Status: Completed.

Recommendation 32

Re-define the job description of the Bandyup Clinical Nurse Manager to focus on developing gender-informed clinical expertise in the team and providing a resource and contact point for other prisons holding female prisoners.

Department's Response:

The Clinical Nurse Manager is a managerial position, not a portfolio holder. Gender-informed clinical expertise should be at the operational level within all prisons holding females.

Actions Taken:

- Nil Action.

Level of Support: Not Supported.

Status: N/A.

Recommendation 33

Focus on improved healthcare outcomes not 'community equivalence' when funding primary healthcare in Bandyup prison. Invest accordingly in improved physical infrastructure and adequate staff support and training.

Department's Response:

The Department reorientated its focus on healthcare standards with a view to improved outcomes for female prisoners and in recognition of their disadvantaged backgrounds.

Actions Taken:

- As per Recommendation 15 above.

Level of Support: Supported.

Status: Completed.

Recommendation 34

Revisit the four cornerstones of care as a model for health staffing, as espoused by the Department in 2011, and develop a health staffing model for Bandyup as recommended by the 2011 inspection.

Department's Response:

The four cornerstones referred to are actually philosophical concepts which are supported by Health Services. Health Services ongoing development and strategic planning for future service provision at Bandyup includes increasing staffing levels to accommodate service requirements, muster increases, the increased complexity of health conditions, and the ageing inmate population. Staff modelling, and hence workforce increases, are dependent on budget approval (as well as infrastructure and prison regime).

Actions Taken:

- The FTE for Health staff for Bandyup Prison is determined by the needs of the prison population. The four corner stones no longer apply.
- Further work done in relation to the resourcing requirements linked to Melaleuca.

Level of Support: Supported in principle.

Status: Completed.

Recommendation 35

Ensure that health staff maintain and develop professional competencies by encouraging and funding attendance at external programs and courses.

Department's Response:

The Department reviewed the health staff professional development and competency maintenance framework and, where necessary, progress submissions for additional funding needs.

Actions Taken:

- As per Department's response.

Level of Support: Supported in principle.

Status: Completed.

Recommendation 36

Recognise the discrimination inherent in the current health screening tool and develop a tool that is gender-sensitive and culturally appropriate. The tool should include improved screening for visual and hearing difficulties, reproductive/gynaecological issues, and mental illness/impairment.

Department's Response:

The Initial Health Screening (IHS) tool is generic because it is the initial assessment performed to determine the acute danger of a new prisoner at the time of their reception.

This is an extremely successful tool due to the low incidences of self harm and medical incidents at this time. Gender-sensitive information is captured at a more appropriate time when a full health assessment is undertaken by health staff.

Actions Taken:

- No action.

Level of Support: Not Supported.

Status: Completed.

Recommendation 37

Review medication administration processes at Bandyup and other prisons to ensure that they are safe and timely, in keeping with accepted clinical practice and licensing recommendations.

Department's Response:

Medication administration processes to be reviewed.

Actions Taken:

- The medication administration process has been reviewed and the current model meets the required safety regulations.
- DCS complies with the Prisons Act 1981, Poisons Act 1964, Poisons Regulations 1965, Health Practitioner Regulation National Law (WA) Act 2010, and Health Service have an overarching policy for the management of medication that is consistent with this legislation (MM00).

Level of Support: Supported.

Status: Completed.

Recommendation 38

Improve services to address drug use and withdrawal at Bandyup. This should include a culturally secure drug and alcohol service for Aboriginal prisoners in line with the Government's framework for Aboriginal drug and alcohol service development.

Department's Response:

Addiction and withdrawal services are provided to Bandyup using evidence based practice. Every effort is made to return women to country although this may not be possible on admission/remand. The Aboriginal Drug and Alcohol framework for Western Australia 2011-2015, specifically relating to services being culturally secure, has limited practical applicability to services in prison, as it focuses heavily on community input which is impractical in a prison setting.

Actions Taken:

- Alcohol and Other Drug (AOD) treatment is being adequately addressed for female prisoners with the opening of the Wandoo Rehabilitation Prison, the Wungening through-care service and appropriate clinical interventions such as the Pathways substance use program.

Level of Support: Supported.

Status: Completed.

Recommendation 39

Improve services to mentally ill and psychologically vulnerable female prisoners, including: (a) a more integrated and comprehensive response in which ARMS, SAMS and PRAG are one part of a holistic ongoing counselling and treatment service; (b) increased psychiatrist consultation sessions; (c) individualised shared care plans promoting multidisciplinary teamwork; and (d) improved services to assist transition to the community

Department's Response:

A comprehensive review of policies, practices and procedures to optimise the care and supports provided for mentally ill and psychologically vulnerable prisoners at Bandyup has commenced. Where necessary, to improve services and outcomes, a funding submission will be made for Government consideration.

Actions Taken:

- Improved integrated procedures are in place and overseen at the local level by coordinated input into the Prisoner Review Assessment Group (PRAG) process and the development of individual care plans.
- The Prison Counselling Service (PCS) as of July 2018 became part of the Health Services Directorate which will further assist in information sharing and effective service coordination. Additional Echo licenses are being purchased to further facilitate appropriate sharing of information with PCS staff.
- For prisoners who are soon to be released, the Mental Health Commission has contracted with the State Forensic Mental health Service to deliver an in reach mental health transition service to support patients by connecting them with local mental health services in the community with a view to improving continuity of care.

Level of Support: Supported.

Status: Completed.

Recommendation 40

Working jointly with the Department of Health and the Mental Health Commission, the Department should commission a dedicated mental health unit at Bandyup, and decommission the CCU. The new unit should be operated differently from standard prison units, with a multidisciplinary team, including a full-time forensic psychiatrist, supported by an appropriately trained staff. It should include a strong focus on reintegration services.

Department's Response:

The CCU cannot be decommissioned as its purpose is to provide crisis care to those prisoners at an acute risk of self harm.

The Department has reviewed the mental health management facilities and staffing needs at Bandyup. Immediate, medium and long term strategies are being developed that will address the needs of mentally ill prisoners and those in need of crisis care.

Actions Taken:

- The requirement for health precincts has been captured and included in the Mental Health Commission's 10 year plan. It should be noted that the plan is unfunded.
- In the meantime, there are procedures to manage these particular prisoners.

Level of Support: Supported.

Status: Completed.