



Government of **Western Australia**  
Department of **Justice**  
**Corrective Services**

# **Response to OICS Draft Report:**

**2021 Inspection of Greenough Regional  
Prison**

**April 2022**

Version 1.0

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## Response Overview

### Introduction

On 14 May 2021, the Office of the Inspector of Custodial Services (OICS) announced its inspection of Greenough Regional Prison (Greenough) scheduled to occur from Sunday, 19 September 2021 to Friday, 24 September 2021. Greenough's last inspection was brought forward and occurred from August 2018 until early 2019 following the riot that occurred at the prison on 24 July 2018 resulting in multiple escapes and major damage to infrastructure of the prison.

As per usual process, the Department of Justice (the Department) facilitated a wide range of documentation and access to systems, policies, processes, the facility including staff, prisoners and contractors were made available to OICS upon request for the purpose of the inspection.

On 15 March 2022, the Department received a draft report of the inspection from OICS for review and comment. Sixteen recommendations are made in the draft report. The Department has reviewed the draft report and provides further context, comments, and responses to the recommendations.

Appendix A contains further comments and inconsistencies linked to sections in the report for the Inspector's attention and consideration when finalising the report.

### Review Comments

Greenough has been through a significant period of change and external scrutiny since the riot that occurred in July 2018. Along with the OICS inspection that occurred post-incident, an independent review commissioned by the Department was undertaken by Ms Jan Shuard PSM into the causal factors, the Department's management and response to the incident, and improvement opportunities.

The Department responded to the 11 recommendations and 33 specific actions in the Shuard report. As at March 2022, 27 of these actions have been completed while six actions relating to the construction of the Women's Precinct and redesign of the Department's Emergency Management Framework remain in progress.

The construction of the Women's Precinct support buildings to allow the safe return of the women prisoners to Greenough has been completed and awarded practical completion on 22 October 2021. A Women's Precinct Operational Readiness Working Group, established in May 2021, has focused on the development of an operational plan for the precinct which will eventually accommodate up to 80 prisoners and provide a complete suite of services to women prisoners of all security ratings, including those who are remanded and sentenced. An Assistant Superintendent for Women Services has been specifically appointed to support the plan to gradually return women prisoners to Greenough commencing in April 2022 and to manage the Women's Unit in the future.

A new Service Level Agreement, which includes additional staffing for the Women's Precinct has been endorsed by the Western Australian Prison Officers Union (WAPOU) and the Deputy Commissioner of Adult Male Prisons and has been approved by the Department's Director General.

A Banding Agreement between WAPOU and the Department has been developed to provide gradual staffing increases in accordance with an approved fill plan that supports the gradual increase of women prisoners in the Women's Precinct.

Since the riot, the Department has invested almost \$19 million in remediation and infrastructure works to strengthen and harden the facility, including \$12.3 million to rebuild and renovate Unit 4 as the new stand-alone women's precinct. Other enhancements include upgrades to the control rooms, grilles, glazing, new cell doors, dividing fences including a pulse-energised fence wrapped around the entire perimeter, an escape race for the protection of staff and prisoners, and digitisation of the Closed-Circuit Television (CCTV) system. Units 2 and 3 that were significantly damaged during the riot had to undergo extensive refurbishment, with Unit 3 having to be rebuilt. These units were returned to normal operations in May and June 2019 respectively.

The Department recognises that although it is almost four years since the riot, the prison, including staff and prisoners, remain on a journey of recovery. The ongoing psychological impact to some of the staff and prisoners who were present at the time of the riot is acknowledged. However, the stable and dedicated senior management team at Greenough has led the recovery and continues to provide ongoing counselling and welfare support for staff and prisoners, and at the same time driving positive change and improvements at the prison.

Staff continue to have access to the Department's Employee Welfare Services including PeopleSense which provides confidential professional counselling services for employees and their family members. Prisoners have access to a wide range of support services including mental health and psychological support, which they are referred to or can self-refer.

The Department also focused on emergency management and incident response capabilities through a wider examination of riot control training, equipment and the adequacy of the Incident Control Facilities (ICFs) across the custodial estate. Extensive work has been undertaken at the local level to enhance response capability in all facilities.

Greenough's Incident Control Facility (ICF) and administration buildings have been strengthened, additional riot control equipment has been purchased and ongoing incident management training is being delivered for staff. This training has more rigour and intensity, including the testing of the ICF and specific incident commanding roles played during these exercises.

Following a review of all ICFs across the estate, the ICFs are now operational, and all facilities conduct regular exercises to test preparedness and infrastructure. External agencies including WA Police Force, Department of Fire and Emergency Services and St Johns Ambulance are invited to attend.

As acknowledged by OICS, in 2021 when Cyclone Seroja hit Greenough causing widespread damage across the mid-west, Greenough staff, prisoners and infrastructure were protected by the prompt and effective local emergency response. This confirms the improvements in emergency management that have been made at Greenough in the years since the riot.

The Department's Emergency Management Framework (EMF) is being redesigned to focus on recovery activities, including the impacts an emergency may have on the health and wellbeing of staff, prisoners and other persons. It will incorporate horizon scanning to ensure appropriate planning and preparedness for existing and emerging threats. Delays in the completion of this work has been a result of challenges faced with recruiting subject matter experts in this field. Specialist resources are now on board, with progress having ramped up and monitored through regular updates provided to the Corrective Services Executive Team.

Since the riot, Greenough has been successful in recruiting staff from within the region, although staff recruitment and retention, particularly in regional areas continues to be a challenge for the Department, as it is for many agencies and businesses. OICS note that Greenough has undertaken a local recruitment process, and this is a positive and proactive approach to staff retention. It was also noted that Greenough was operating with full staffing at the time of the inspection, using controls such as overtime and redeployment to cover shifts.

The Department understands that the impact of COVID-19 across all prisons cannot be underestimated and that the COVID response will result in some prisoner dissatisfaction with regard to reduced access to recreation, attendance as spectators at sporting events and visits restrictions.

Corrective Services has been recognised by Government as being a high-risk environment and therefore specific restrictions for infection prevention and control are required to keep prisoners, staff and visitors as safe as possible from COVID. The Department must follow all health advice and Directions as determined by the Government and can only lift restrictions when deemed safe to do so. The Department has implemented initiatives to reduce the impact of these restrictions, including e-visits and in-cell activities for prisoners. However, as occurs within the community, the impact to daily life must be managed in accordance with COVID safety protocols and health mandates.

With regard to accommodation and housing for prisoners upon release, the Department continues to actively pursue opportunities to improve on the current housing situation for prisoners transitioning into the community. The Department has strategic partnerships with government departments and has existing reintegration services agreements with multiple NGO service providers who provide public housing properties that are used to accommodate released prisoners.

It should be noted that rental accommodation state-wide is at capacity in both the social and private rental markets, limiting the service providers' access to additional housing. Rental agencies also have long waitlists for access to rental properties, and some are not accepting new referrals for accommodation.

Homelessness and housing availability is a complex issue affecting many people in the community. The Department's clients do not have priority access to accommodation over other vulnerable cohorts.

Greenough is a well performing mixed-gender prison in terms of overall prison performance measures. This is despite being a regional prison housing primarily medium and minimum-security prisoners, both males and females, including a significant population of remand prisoners, and as such is required to provide a diverse range of services.

In July 2021, the Department's Operational Compliance Branch awarded Greenough Regional Prison the highest compliance rating of any WA correctional facility to date. The comprehensive compliance audit included emergency management, at-risk management systems for supervising people with higher needs, gate-house procedures, the safe storage of tools and equipment, search procedures and perimeter security.

Although the OICS report highlights lingering dissatisfaction among some staff and prisoners since the riot in 2018, the Department is pleased to note OICS' acknowledgement of the improvements that have been made to date and recognition

that recovery from a major incident is a long road that can have short and long-term effects.

*‘There are some well entrenched negative views and cynicism that will take time, effort and communication to turnaround and resolve. But some may never be happy.’<sup>1</sup>*

The Department is pleased to have opened the Women’s Precinct, which is an excellent opportunity to enhance the service delivery model for women and provide a safe, gender-informed and culturally appropriate place for female prisoners. The Department will continue to look at ways to improve services and outcomes for staff and all prisoners at Greenough.

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<sup>1</sup> Page 11, Draft Report - OICS Inspection of Greenough Regional Prison 19-23 September 2021

## Response to Recommendations

### 1 Proactively offer meaningful mental health support to staff and prisoners who were present at Greenough during the riot.

<b>Level of Acceptance:</b>	Supported – Current Practice / Project
<b>Responsible Division:</b>	Corrective Services
<b>Responsible Directorate:</b>	Adult Male Prisons
<b>Proposed Completion Date:</b>	Closed

#### Response:

Since the 2018 incident, staff and prisoners remain on a journey of recovery. Significant infrastructure works have been undertaken to repair the damage and the construction of a women's precinct is nearing completion

The stable and dedicated senior management team at Greenough has led the recovery and continues to provide ongoing support for staff and prisoners who were at Greenough during the incident.

Staff continue to have access to Department employee welfare services including PeopleSense who provide confidential professional counselling services for employees and their family members.

Prisoners have access to a wide range of support services including mental health and psychological support, which they are referred to or can self-refer.

The Department's Emergency Management Framework is being redesigned to focus on recovery activities which include the impacts an emergency may have on the health and wellbeing of staff, prisoners and other persons. This work forms part of the response to previous recommendations made by OICS in the 2018 Inspection of Post-incident Management of Prisoners at Greenough Regional Prison.

### 2 Ensure foreign national prisoners can access the resources and supports required to engage in a fair appeals process.

<b>Level of Acceptance:</b>	Supported – Current Practice / Project
<b>Responsible Division:</b>	Corrective Services
<b>Responsible Directorate:</b>	Adult Male Prisons
<b>Proposed Completion Date:</b>	Closed

#### Response:

The Department has established processes in place to support prisoners facing deportation and provide ongoing facilitation of prisoner communication with relevant immigration agencies and consular supports as required.

COPP 2.1 Reception specifically provides for the needs of Foreign Nationals to be assessed and for support to be provided where a need is identified. This includes allowing Foreign National prisoners to contact their nearest Consulate and receive an official visit from a consular representative. The reception process requires for an interpreter service to be engaged for prisoners with a poor understanding of English.

COPP 7.1 Prisoner Communications provides for Foreign National prisoners to telephone their Consulate at the prison's expense.

It should be noted that the Department is not in a position to provide legal or immigration advice to prisoners and is not involved in the decisions of immigration matters pertaining to non-citizen prisoners.

**3 Develop a meaningful hierarchical management model that offers a range of quality and accessible incentives.**

**Level of Acceptance:** Not Supported  
**Responsible Division:** Corrective Services  
**Responsible Directorate:** Adult Male Prisons  
**Proposed Completion Date:** N/A

**Response:**

COPP 10.1 Prisoner Behaviour Management and Greenough's Standing Order 10.1 Prisoner Behaviour Management provide a hierarchical management model which rewards prisoners' good behaviour with eligibility to increased privileges and a lower level of supervision.

Incentives, such as self-care accommodation, longer phone calls, Xbox access, extra visits and higher spending limits at the canteen are some of the earned privileges offered to prisoners.

The Department acknowledges that the placement of women in Unit 5 has impacted on Greenough's ability to award 'Earned Supervision' to male prisoners who would normally be placed in Unit 5 as part of the Earned Supervision. With the Women's precinct due becoming operational, the plan is to revert Unit 5 to its original purpose of providing self-care accommodation and earned supervision for male prisoners.

**4 Avoid redeploying recreation officers and invest in fit for purpose gym equipment, which includes a portable equipment trolley to move between units.**

**Level of Acceptance:** Not Supported  
**Responsible Division:** Corrective Services  
**Responsible Directorate:** Adult Male Prisons  
**Proposed Completion Date:** N/A

**Response:**

The redeployment of the Activities Officer does not impact on the delivery or access for prisoners to undertake recreational activities in their units. Unit staff provide for the supervision of their prisoners during periods of recreation in the units.

Unit-based recreational equipment and access to sporting and fitness equipment has been implemented and will continue to be reviewed and expanded.

Each unit has been provided with isometric equipment, medicine balls, skipping ropes, basketballs, rowing machines and table tennis. Fitness circuits are currently being developed for unit recreation prisoner workers to lead with prisoners.



## **5 Explore safe options to allow more prisoners on the oval as spectators.**

**Level of Acceptance:** Supported in Principle  
**Responsible Division:** Corrective Services  
**Responsible Directorate:** Adult Male Prisons  
**Proposed Completion Date:** 30 June 2023

### **Response:**

The Department maintains that having too many prisoners on the oval as spectators during a sporting event poses a security risk.

To ensure fairness and impartiality, a risk assessment will be conducted to assess the feasibility of including spectating as an earned privilege and as part of Greenough's incentive scheme.

## **6 Increase the number of phones in each unit.**

**Level of Acceptance:** Supported – Current Practice / Project  
**Responsible Division:** Corporate Services  
**Responsible Directorate:** Knowledge, Information and Technology  
**Proposed Completion Date:** Closed

### **Response:**

Digital technology forms a major part of the Department's Long-term Custodial Technology Strategy. This includes digitising the Prisoner Telephone System (PTS). There are constraints with expanding the current PTS and a business case to replace the PTS is being developed.

Progress is being made through the Corrective Services Information and Communications Technology (ICT) Governance process so that the current state, business requirements and available options are well understood. Prioritisation of the preferred option within the current pipeline of work will be determined by the Corrective Services Technology Working Group.

## **7 Facilitate sorry time at the cultural place and ensure welfare calls are always offered when there has been a loss.**

**Level of Acceptance:** Supported – Current Practice Project  
**Responsible Division:** Corrective Services  
**Responsible Directorate:** Adult Male Prisons  
**Proposed Completion Date:** 31 December 2022

### **Response:**

Greenough recognises the importance of sorry time and works with prisoners to facilitate this where possible.

Additional services are also engaged to provide support during this time of grief such as Psychological Health Services, Aboriginal Visitors Scheme, Peer Support Officers, Chaplaincy and Peer Support.

In the event a prisoner is unable to attend the funeral they are offered alternative support assistance including:

- (a) officer-initiated calls to family
- (b) e-visits with family and/or community
- (c) eulogy forwarded to family for reading at the service.

Greenough is currently working on enhancing the cultural place to better facilitate cultural purposes.

**8 Implement a 'cook fresh' system so that meals are served on the same day as they are prepared.**

**Level of Acceptance:** Not Supported  
**Responsible Division:** Corrective Services  
**Responsible Directorate:** Adult Male Prisons  
**Proposed Completion Date:** N/A

**Response:**

The 'cook/chill' method is necessary to provide flexibility and ensure food is available for prisoners. The 'cook/chill' method is a simple and accepted controlled system of food preparation designed to provide more flexibility in food service. Meals can be prepared, cooked, chilled and reheated with little or no nutritional loss and without altering its appearance or taste.

Greenough will review the provision of additional cultural food to prisoners with the intent of increasing the availability at other times of the year i.e., beyond the annual National Aborigines and Islanders Day Observance Committee (NAIDOC) celebrations.

Greenough will also seek to increase the number of opportunities for prisoners to prepare and cook their own meals on occasion.

**9 Review the role and functions of Unit 1 at Greenough to ensure staff can meet all the requirements of the different prisoner cohorts sent there.**

**Level of Acceptance:** Supported in Principle  
**Responsible Division:** Corrective Services  
**Responsible Directorate:** Adult Male Prisons  
**Proposed Completion Date:** 30 June 2023

**Response:**

Unit 1 is a multi-purpose unit that is required to manage prisoners under different supervision levels and regimes. The Department does not currently intend to seek the required capital and infrastructure solution required to change the use of Unit 1.

Greenough will review its orientation process with a view to identifying opportunities for orientations / inductions to be held in an alternative location such as the recreation hall or visits area.

## **10 Upgrade Unit 6 to include fit for purpose gym equipment, self-care facilities and adequate visit amenities.**

**Level of Acceptance:** Supported – Current Practice / Project  
**Responsible Division:** Corrective Services  
**Responsible Directorate:** Adult Male Prisons  
**Proposed Completion Date:** 31 December 2023

### **Response:**

Greenough is currently preparing a business case to improve the living standard of Unit 6 which will include a kitchen/dining area. This includes considering minimum accommodation unit models in other prisons such as Roebourne Regional Prison and Wooroloo Prison Farm.

Greenough has improved the gym area in Unit 6 with walls being built on two sides by section 95 prisoners to extend the area. The gym equipment is being replaced and/or new items purchased to increase options, for example, the prison recently purchased a new rowing machine. The provision of free weights and other gym equipment will be considered in line with equipment available to other minimum-security prisoners at facilities such as Karnet Prison Farm.

The dryer and washing machines were reported and ordered for replacement at the time of the inspection.

Greenough is considering options to enclose the Unit 6 visits area to make this a more comfortable and inviting area for visits.

## **11 Identify and implement an effective recruitment and retention strategy for health clinicians to staff regional prisons like Greenough.**

**Level of Acceptance:** Supported in Principle  
**Responsible Division:** Corrective Services  
**Responsible Directorate:** Offender Services  
**Proposed Completion Date:** Closed

### **Response:**

The Department has faced a number of challenges recruiting health professionals over the years.

Extensive media campaigns have been run to assist in recruiting health staff, particularly nursing staff that includes liaison with agencies and local health providers, promotion on internal and external platforms such as JustUS, DoJ Website, Western Nurse magazine, recruitment pools, Facebook, Instagram, LinkedIn, hashtags# and Twitter.

Discussions will continue with the Department's Human Resources branch around employment benefits and incentives to further attract and retain staff.

## **12 Develop and resource a culturally safe and targeted model of health care for Aboriginal prisoners.**

<b>Level of Acceptance:</b>	Noted
<b>Responsible Division:</b>	Corrective Services
<b>Responsible Directorate:</b>	Offender Services
<b>Proposed Completion Date:</b>	N/A

### **Response:**

Health services to Aboriginal prisoners is guided by the WA Aboriginal Health and Wellbeing Framework 2015-2030 that identifies key guiding principles; strategic directions and priority areas for the next 15 years, to improve the health and wellbeing of Aboriginal people in Western Australia.

Access to Indigenous specific support in prisons is also facilitated through aboriginal healthcare workers and aboriginal mental healthcare workers with the assistance of prison support services and the Aboriginal Visitors Scheme. The Department has submitted requests for funding to enable the creation of Aboriginal Health Worker/Liaison Officers to be employed across the Prison Estate. These requests have not been supported by Treasury.

The Geraldton Regional Aboriginal Service (GRAMS) at times in the past provided general practitioner services to Greenough Regional Prison. This service was dependent on the availability of GRAMS practitioners to attend Greenough. Shortages of health practitioners in the Geraldton region meant that GRAMS was unable to provide the doctor service.

## **13 Ensure the PSO and AVS in all regional facilities are stand-alone services and that gaps in services are resourced as a priority.**

<b>Level of Acceptance:</b>	Supported – Current Practice/Project
<b>Responsible Division:</b>	Corrective Services
<b>Responsible Directorate:</b>	Offender Services
<b>Proposed Completion Date:</b>	Closed

### **Response:**

Prison Support Services (PSS) which is comprised of Prison Support Officer (PSO) and the Aboriginal Visitors Scheme (AVS) have and continue to experience significant staff shortages state-wide.

The AVS service model is being reviewed as part of the Department's Innovate Reconciliation Action Plan (RAP) 2022-2024, with a view to improving service delivery. This work will be monitored and reported on as part of the RAP.

#### **14 Upgrade gatehouse security systems and layout to provide improved flow, better use of human resources and strengthen overall security.**

<b>Level of Acceptance:</b>	Not Supported
<b>Responsible Division:</b>	Corrective Services
<b>Responsible Directorate:</b>	Procurement, Infrastructure and Contracts
<b>Proposed Completion Date:</b>	N/A

##### **Response:**

The Greenough Regional Prison opened in 1984 as a minimum-security facility, the gatehouse was subsequently constructed in 1987 primarily as a visitors' centre. The facility was subsequently upgraded to a medium security facility in 1990 which included the erection of a prime barrier and inner perimeter fence including detection, limited perimeter CCTV and sallyport. The visitors' centre then transitioned to a gatehouse.

In 2014 the security of the gatehouse was upgraded as a result of multiple escapes over the previous years and in 2018 the sallyport was further upgraded, the height increased and more secure sallyport doors were added to facilitate entry and exit of larger vehicles including new fire appliances.

A gatehouse upgrade has not been prioritised at this stage within the Long-Term Custodial Infrastructure Plan (LTCIP). A preliminary schematic has been developed to provide better flow and staff/visitor separation within the current footprint, including contraband detection and self-service keys, radios and duress alarms for staff and a dedicated cashiers office accessible to visitors from outside the prison. The preliminary estimate to undertake this work is \$6 - \$8 million. A dedicated Business Case will be required in the future.

#### **15 Improve processes to identify and connect all eligible prisoners with work and training opportunities prior to release.**

<b>Level of Acceptance:</b>	Supported – Current Practice / Project
<b>Responsible Division:</b>	Corrective Services
<b>Responsible Directorate:</b>	Offender Services
<b>Proposed Completion Date:</b>	Closed

##### **Response:**

The Employment Coordinator at Greenough continues to undertake this role and where appropriate and supported by the prison, Prisoner Employment Program (PEP) applications are progressed.

The Transition to Work Employment Services (TWES) Provider is contracted by the Commonwealth Government to specifically connect with all Aboriginal prisoners prior to release and link them to Centrelink and Job Active providers. TWES is designed for service providers to have at least three face-to-face meetings with participants to determine a prisoner's specific employment needs prior to release.

Under the TWES, each participant receives a number of supports, including:

- A transition plan to address any employment barriers identified in the work capacity assessment; and

- A meeting with the participant's post-release employment service provider, to arrange contact with the employment service provider once the participant leaves prison.

The Department refers eligible prisoners to the contracted service provider and keeps a record of how many prisoners are referred to the program. The process for selecting prisoners belong to the TWES provider contracted by the Commonwealth.

**16 Provide an appropriate range of voluntary addiction, personal development, healthy relationships, health and life skills programs at Greenough.**

**Level of Acceptance:** Supported – Current Practice / Project  
**Responsible Division:** Corrective Services  
**Responsible Directorate:** Offender Services  
**Proposed Completion Date:** Closed

**Response:**

Two adult rehabilitation and reintegration service agreements have been in place since 1 April 2018 in the Midwest Gascoyne Region as follows:

- Regional Alliance West (RAW) deliver re-entry and accommodation services. This includes pre-release skills such as relationships, employment, health, life skills and post-release linkages and referrals to relevant education, employment, training, or other services. RAW also deliver the Transport Options Program (TOPs) to support the successful return of prisoners to home community's post-release.
- Anglicare deliver family and domestic violence (FDV) rehabilitation services at Greenough Regional Prisons and in the community.