

Appendix 1

THE DEPARTMENT'S RESPONSE TO THE 2014 RECOMMENDATIONS

Recommendation	Acceptance Level/Response
<p>1. The Department should ensure that Bandyup'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.</p>	<p>Supported 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.</p>
<p>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.</p>	<p>Supported 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.</p>
<p>3. (a) Appoint a new substantive Superintendent to Bandyup or appoint a person to a long-term acting position; (b) examine the best management structure for the prison, including additional resources for the short or long-term; and (c) firm up and reinvigorate the Bandyup management team.</p>	<p>Supported 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.</p>
<p>4. Reinvigorate Bandyup's performance management system and procedures with an emphasis on developing relationship and communication skills, as well as improving the PADS system.</p>	<p>Supported 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.</p>
<p>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.</p>	<p>Supported 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.</p>

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<p>6. Develop all unused space at the Bandyup site to maximise opportunities for recreation and relaxation and for personal and cultural development.</p>	<p>Supported 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.</p>
<p>7. Replace Unit 1 with appropriate, contemporary accommodation, and ensure that the new accommodation is designed to take account of key needs, including mental health.</p>	<p>Supported The Strategic Asset Plan is currently being updated with a specific focus on the women's estate, to address current and future needs.</p>
<p>8. Cease the practice of compelling women to sleep on floors.</p>	<p>Supported 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.</p>
<p>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.</p>	<p>Supported 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.</p>
<p>10. Ensure that Bandyup's regime and processes actively tackle issues of prisoner on prisoner bullying and better protect potentially vulnerable individuals.</p>	<p>Supported Bandyup is currently reviewing their anti-bullying policy in order to address the issues raised.</p>

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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.	<p>Supported</p> <p>The Department is looking at how to support the needs of remand prisoners.</p>
12. Provide regular traditional foods for Aboriginal prisoners, and allow them to prepare and cook that food themselves.	<p>Supported In Principle</p> <p>The Department is looking at the demographic profile of female offenders and is exploring their dietary requirements.</p>
13. Increase prison officers' responsibility for supervising unit activities such as food distribution and cleaning with a view to improving hygiene practices.	<p>Supported</p> <p>The Department has clear expectations and responsibilities of all staff which form part of the Prison Officers Enterprise Bargaining Agreement 2013.</p>
14. Resource and implement a proactive, preventative maintenance program.	<p>Supported In Principle</p> <p>The Department is committed to maintaining facilities and already has a comprehensive preventative maintenance program which covers all sites.</p>
15. Bandyup should develop a response to the recommendations contained in the Infection Prevention Consultant's report and implement an appropriate action plan.	<p>Supported In Principle</p> <p>The recommendations contained in the Infection Prevention Consultant's report are currently being progressed and implemented by Bandyup.</p>
16. Improve relational/dynamic security at Bandyup, including a renewed emphasis on respectful relations and positive interactions.	<p>Supported</p> <p>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.</p>
17. The Department should ensure that when key security staff are deployed out of prisons, the positions are backfilled by appropriate staff.	<p>Supported In Principle</p> <p>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.</p>

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<p>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.</p>	<p>Supported In Principle 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.</p>
<p>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.</p>	<p>Supported 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.</p>
<p>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.</p>	<p>Supported 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.</p>
<p>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.</p>	<p>Supported 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.</p>
<p>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.</p>	<p>Supported 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.</p>

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<p>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 underutilised. As part of this improvement, provide more culturally appropriate recreation options for Aboriginal prisoners, including library materials and visits by Aboriginal elders.</p>	<p>Supported 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.</p>
<p>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.</p>	<p>Supported The Strategic Asset Plan is currently being updated with a specific focus on the women's estate, to address current and future needs.</p>
<p>25. Expand the bus service to and from visits at Bandyup to include access to earlier and more frequent visit sessions.</p>	<p>Supported In Principle The bus service is currently being 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.</p>
<p>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.</p>	<p>Supported – Existing Departmental Initiative 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.</p>
<p>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.</p>	<p>Supported The afternoon routine is currently being reviewed to avoid the issues raised. New canteen times have already been introduced.</p>

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<p>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.</p>	<p>Supported 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.</p>
<p>29. Ensure that adequate resources are allocated to Bandyup to facilitate re-entry; revitalise the Transitional Manager's role; and reintroduce prison employment positions to assist the Transitional Manager.</p>	<p>Supported 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.</p>
<p>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.</p>	<p>Supported 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.</p>
<p>31. Update Policy Directive 10 to provide: (a) more flexible transfer criteria for pregnant women in regional prisons so that they are 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.</p>	<p>Supported In Principle The Department is currently reviewing Policy Directive 10 and will take into consideration the issues raised.</p>

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<p>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.</p>	<p>Not Supported 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.</p>
<p>33. Focus on improved healthcare outcomes not 'community equivalence' when funding primary healthcare at Bandyup. Invest accordingly in improved physical infrastructure and adequate staff support and training.</p>	<p>Supported The Department will reorientate its focus on healthcare standards with a view to improved outcomes for female prisoners and in recognition of their disadvantaged backgrounds.</p>
<p>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.</p>	<p>Supported In Principle 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).</p>
<p>35. Ensure that health staff maintain and develop professional competencies by encouraging and funding attendance at external programs and courses.</p>	<p>Supported The Department will review the health staff professional development and competency maintenance framework and, where necessary, progress submissions for additional funding needs.</p>
<p>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.</p>	<p>Not Supported 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.</p>

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<p>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.</p>	<p>Supported Medication administration processes are currently being reviewed.</p>
<p>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.</p>	<p>Supported In Principle 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.</p>
<p>39. Improve services to mentally ill and psychologically vulnerable female prisoners, including:</p> <ul style="list-style-type: none"> (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. 	<p>Supported 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.</p>

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<p>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.</p>	<p>Supported In Part</p> <p>The CCU can not be decommissioned as its purpose is to provide crisis care to those prisoners at an acute risk of self-harm.</p> <p>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.</p>
