

31 August 2020

C125234

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Tēnā koe Peter

**Provisional Optional Protocol for the Convention Against Torture (OPCAT)  
follow up inspection report Christchurch Men's Prison**

Thank you for your letter dated 5 August 2020, where you provided the Department with the opportunity to respond to the provisional OPCAT follow up inspection report for Christchurch Men's Prison (CMP). Please find attached the completed table of responses to the recommendations made in the provisional report.

From 25 to 28 February 2020, your inspectors conducted an unannounced follow up inspection at CMP. This follows your inspection of CMP in April 2017 and the resultant inspection report in December 2017 which produced 54 recommendations. The follow up inspection has found that of the 54 recommendations you made in December 2017, 10 have been achieved, 12 partially achieved and 27 not achieved.

Your team were unable to assess or verify the status of a further five recommendations due to the inspection time constraints and the subsequent COVID-19 lockdown.

Of the 27 recommendations made from your 2020 inspection, the Department has accepted 23, partially accepted three and have rejected one recommendation. Work has been completed or commenced in relation to all the accepted recommendations since the time of your inspection.

We agree there is always more work to do. However, balancing our obligations, challenges and competing priorities against the time and resources available means that we must make difficult choices about where to focus our efforts.

We are committed to ensuring we operate a prison network that protects the safety of those in our care, our staff and contractors, and New Zealand communities. We do this by providing individuals with access to health and wellness services and every opportunity for change through participation in rehabilitation, education and employment. Our goals are to provide people with the best chance of living a life free from crime and reduce the number of victims impacted by offending.

This work is done within the context of a number of significant and complex challenges including:

- ensuring the safety of our staff in a high-risk environment;
- the fluctuating prison population;
- addressing deeply entrenched gang lifestyles; and
- the recognition that many of those in our care have been impacted by trauma, abuse, mental health concerns, addiction and cultural disconnection.

As you are aware, in August 2019, we launched our strategy, Hōkai Rangi. Hōkai Rangi represents a new strategic direction for our organisation, one that builds on the good practice already occurring, while working to innovate to find new and alternative methods of practice to achieve better outcomes for the people we manage, their whānau and the wider community.

At the heart of Hōkai Rangi is a clear statement about our purpose, "*Kotahi ano te kaupapa: ko te oranga o te iwi. There is one purpose to our work: the wellness and wellbeing of people*". It underpins a vision where we focus on shared decision making with Māori, treating people with respect, providing access to culture as a fundamental right, and creating humanising environments that ensure safety and security are maintained. We are currently planning Hōkai Rangi implementation across our entire organisation, developing measures for performance against the strategy, and establishing shared governance with Māori.

We wanted to share a further update in this area, with particular regard to the emphasis on strengthening of partnerships with iwi in the Southern Region. The co-design of the Mana Wahine pathway that will be piloted at Christchurch Women's Prison has commenced. The co-design group includes Tangata whenua and kaupapa Māori providers from across Canterbury. The Māori Services Team Area Advisor in Otago/Southland has been engaging with Tangata whenua to work with Corrections staff to increase their cultural capability and knowledge of Te Ao Māori. For instance, in addition to a waiata/kapa haka group, across the Southern region there are 80 staff members in a Frontline Change Network to implement Hōkai Rangi, as well as a range of Māori Staff Networks that support our commitment to Hōkai Rangi. There are strong, well-functioning relationships in the Nelson Marlborough West Coast area, particularly with the Te Ihu Waka providers.

We are pleased to note this strategic shift aligns with the work being conducted by your office, which looks to improve the experiences for individuals who are subject to detention in New Zealand.

I would like to take this opportunity to note some of the positive comments made by your inspectors when visiting CMP. These relate to:

- The largely positive interactions between staff and prisoners;
- Prisoners' verbal feedback to inspectors regarding staff was generally complimentary;
- The Prison Director and Prison Management team had a number of initiatives to improve conditions at CMP they were working on implementing;
- The increase in employment for high security prisoners;
- Improvements in the availability of purposeful activities for sentenced prisoners;

- The pilot Intervention and Support Project (ISP) team working alongside custodial staff to improve conditions for prisoners with mental health concerns<sup>1</sup>;
- A great improvement in prison entry search procedures.

You have noted areas in your foreword where you remain concerned about certain practices occurring at CMP, all of which have resulted in recommendations. These concerns relate to high levels of use of force in the Intervention and Support Unit (ISU), the use of unapproved control and restraint techniques, privacy in the ISU, minimum entitlements being denied for one prisoner, lack of time out of cells and meaningful activities for remand prisoners.

We have responded to each of these concerns in the attached recommendations response table.

I want to take this opportunity to respond to some of the additional comments throughout the report.

Your draft report references the Intervention and Support Project and its efficacy at CMP; specifically, you consider other than the introduction of the ISP team, your inspectors found that little had changed since 2017 for the management of individuals in the unit at risk of suicide and self-harm.

The Department is proud of the work completed by the ISP at the pilot sites, as well as the larger focus across the prison estate to better support prisoners with mental health needs and the staff working with these individuals. There has been a myriad of schemes and practice changes that have come into effect since 2017, including the roll out of the supported decision making framework, trauma informed care guidelines, Mental Health 101 programme for custodial staff, the implementation of a care continuum matrix to provide wrap around services to those who are at risk, the enhancement of ISUs to provide a therapeutic environment, individualised care plans and a greater emphasis on connection between custodial and ISU staff, as well as unit staff, to provide appropriate transition plans for individuals.

The ISP (pilot) has now finished, and the Intervention and Support team are operating on site as 'business as usual'. The Intervention and Support team are now working on developing and implementing the new practice pathways to enable a more effective ISU service and humanising environment for people in our care.

With the closure of the ISP, further support measures have been put in place for the ISU team at CMP. This includes a Staff Welfare Coordinator who will be on site for several hours in the ISU over the coming weeks. The Staff Welfare Coordinator will look at staff welfare in the ISU and measures to further enhance, develop and strengthen the current practice. Where appropriate, the Staff Welfare Coordinator will make recommendations that will work to support staff in the ISU. The Staff Welfare Coordinator will also look at staff duties within the ISU and environmental factors and how these align to the staff wellness day training that is delivered. Professional supervision has been discussed with the Staff Welfare Coordinator, and he considers this supervision model to be very effective in supporting the continued

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<sup>1</sup> The ISU pilot project has now ended but was still underway at the time of the visit in February 2020.

good mental health and wellbeing of our ISU staff. This work fully aligns with the principles of Hōkai Rangī and its focus to drive continual improvement.

To support these practice changes, the Department has been focused on recruiting mental health specialists in our prisons and in our National Office team, to provide continuous support and best practice care to individuals with mental health concerns. Recruitment in this area includes the appointment of a Director Mental Health & Addiction Services, Manager of Addiction Services, Manager of Mental Health Quality & Practice, Senior Mental Health Advisers and Regional Principal Mental Health Advisers. In addition, a newly established Chief Māori Health Advisor role has recently been appointed. The Southern Region Principal Health Advisor appointee will commence the position in September 2020 and will lead regional work on a more coordinated, stepped care approach for the people in our care.

We are investing considerably in this area and are committed to the ongoing consideration and enhancement of the provision of mental health care. Specifically, we are focused on improving our data outcomes and output frameworks for Health Services, improving our Health Services alignment with Ministry of Health and external agencies and their strategic direction and developing a kaupapa Māori-based model of care as part of the health transformational work programme. We are also in the process of developing a national calendar of Mental Health training to roll out to staff at all prisons.

You mention your inspectors reviewed a sample of case management plans for remand accused prisoners, which you note were lacking in content and often lacked any “tangible outcomes”. You noted that while assessment of remand prisoners was occurring, this did not appear to translate into meaningful, timely outcomes for this cohort.

I want to provide you with some detail regarding a project being led by our Case Management Practice team that is taking a closer look at remand practice in case management. This project is still being scoped; however, as a starting point, it intends on reviewing our practice framework against other international jurisdictions and evidence-based research. Further, it intends to strengthen the practice guidance for staff and associated practice tools available. The impact of COVID-19 has meant this piece of work has been delayed; it is anticipated that it will commence in September 2020.

Importantly, there are a number of pieces of ongoing work related to case management. In early August 2020, a significant change to the system used by case management was implemented. This change means there is greater visibility of the allocated case manager’s work with individuals, as well as a reduction in time spent on administrative tasks for case managers. The recent development of a national briefing for case management staff that supports best practice when writing and updating offender plans was also rolled out to staff at the end of August 2020. Finally, new reporting for case management is being developed; this is expected to be available in mid-September 2020.

In the draft report, you also made mention of an inability to test for synthetic psychoactive substances at the prison at the time of your inspection. You are aware

that Corrections has been working on this complex issue nationally and note that you look forward to developments in this area.

I am pleased to share with you that in line with legislation (effective 29 April 2020), standard drug testing now includes the ability to test for synthetic psychoactive substances. In addition to this advancement in testing, the Department now has nine dog teams nationally trained to detect psychoactive substances. Importantly, this is the first time this has been achieved in Australasia. We are encouraged by our recent advancements in the testing and detection of synthetic psychoactive substances and its wider contribution to reducing the introduction of contraband into our prisons.

Finally, we recognise the responsibility your office has in examining and monitoring the general conditions and treatment of people in New Zealand prisons. We value the feedback provided in your reports which will be used to improve aspects of the management of prisoners where possible, in line with current constraints. We will continue to engage with your staff on follow up inspections at these sites.

I trust our responses to the recommendations made in your draft report are helpful. I look forward to hearing from you in due course, in preparation for the publication of the finalised report.

Yours sincerely



Jeremy Lightfoot  
Chief Executive



## Christchurch Men's Prison - Follow up inspection

### Recommendations 2020

Recommendation	Accept/ Partial/ Reject	Corrections' Response
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<p>1. The Prison Director takes action to reduce the incidence of use of force in the ISU. <b>This is an amended repeat recommendation (refer 2017 1a)</b></p>	<p>Accept</p>	<p>Staff are trained to consider all options available to avoid the use of force. Priority is also placed on ensuring all staff are up to date with their core competencies, which includes accepted control and restraint practices and tactical communications. Tactical communications work to provide staff with the skills required to successfully de-escalate high pressure situations and incidents.</p> <p>Corrections’ National Office based Mental Health team has set up initial interim debriefing and clinical supervision to support custodial staff to use trauma informed approaches. In the longer term, Intervention and Support Unit (ISU) custodial supervision has been established on a monthly basis for all ISU custodial staff within the ISP pilot sites<sup>1</sup>. It is recognised that clinical supervision is a way of undertaking reflective practice that endorses discussion regarding best practice. This clinical supervision is a forum for staff to reflect on incidents and to practice quality improvement methods to reduce restraint practices.</p> <p>In addition to increasing the provision of staff supervision, Mental Health 101 training for ISU custodial staff has also been rolled out, with Dr Nick Wilson recently delivering training to ISU staff on working with people with complex personality pathology.</p> <p>Training and supervision provide staff working with people in our care with a range of tools and strategies they can use to de-escalate situations and reduce any instances of use of force.</p> <p>As an Intervention and Support Project (ISP) pilot site, CMP also have an Occupational Therapist who uses sensory modulation approaches with the men to assist in emotional regulation. It is recognised that sensory</p>
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	<p>modulation is a proven method to reduce instances of restraint and distress.</p> <p>From the commencement of the ISP in August 2019 to May 2020, 150 people in our care were referred to the CMP ISP team for support. One hundred and twenty referrals were accepted. The ISP recently finished, and the work of the ISP team has become BAU. Going forward, the scope of this team will move from a focus on suicide and self-harm to a broader range of mental health needs.</p> <p>Staff working in the Christchurch Men’s Prison (CMP) ISU are there because they want to make a difference in the lives of people who are unwell. Noting some of the complexities of managing individuals in the ISU and their propensity for hurting themselves, there have been occasions where staff have had to intervene to ensure individuals’ safety. However, any use of force applied in this setting is minimal and is used as a last resort, following the breakdown of earlier interventions. The use of force in the ISU is not a decision that is made lightly, and ultimately it is not a decision that would be made at all if there were not instances where it was necessary.</p> <p>Importantly, CMP have a positive, collaborative working relationship with Hillmorton Hospital and men are admitted to Hillmorton where clinically indicated. Notwithstanding this, there are individuals held in the ISU who have significant behavioural disorders but who do not meet the secure facility criteria (Hillmorton Hospital). The ISP team have completed a significant amount of work with these men whilst in the ISU and support them if it becomes appropriate for them to leave the ISU (and remain in the prison). Whilst there is currently not a significant number of individuals at CMP awaiting admission to Hillmorton Hospital, there will always be</p>
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Recommendation	Accept/ Partial/ Reject	Corrections' Response
		<p>complexities for the ISP team when managing significant behavioural disorders or high-risk individuals. Importantly, the good working relationship between CMP and Hillmorton Hospital supports these individuals receiving ongoing best practice care.</p> <p>To further reduce the use of force (across CMP), the site based Safer Custody Panel meets regularly to discuss and monitor incidents, risks and trends in relation to the safety of people in our care and staff. During this forum, any instances of use of force are reviewed and discussed which provides for a further assurance mechanism. Any concerns identified by the panel are relayed to staff as learning opportunities to ensure that incidents of any nature are managed in accordance with policy.</p>

<p>2. Only approved Control and Restraint techniques are used by staff at the Prison. <b>This is a repeat recommendation (refer 2017 1c)</b></p>	<p>Accept</p>	<p>CMP agree that only approved control and restraint techniques should be used. CMP have robust processes in place to ensure that all incidents where control and restraint is used, are reviewed. In all cases where the use of force is deployed, a review is undertaken by the Security Manager to provide assurance that staff followed procedure and the use of force used was reasonable in the circumstances. This review also identifies learnings for staff, which are discussed and implemented as is necessary. During this review, if any inappropriate use of force is identified, the matter is escalated, and a more formal review of the incident is undertaken. This could lead to further training for staff or potential sanctions.</p> <p>We note that your inspectors reviewed a sample of use of force footage and that custodial staff appeared to use approved techniques in most incidents reviewed. However, your inspectors identified two incidents of unplanned use of force where you note that unapproved techniques were used.</p> <p>We have looked back at the reviews completed following the two incidents occurring and have noted the findings that staff missed applying an expected control and restraint technique in both instances. In the first case, staff did not support the head of the prisoner during a spontaneous use of force following the prisoner damaging property and making advances towards staff. The Acting Prison Director at the time of this incident reviewed the incident and recommended that staff involved receive further tactical training. As noted below, further tactical training and support was provided to staff by the Site Emergency Response Team (SERT).</p>
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Recommendation	Accept/ Partial/ Reject	Corrections' Response
		<p>In the second case, the person was being escorted back to his cell when he assaulted a staff member which resulted in a spontaneous use of force. Staff attempted to relocate the prisoner back to his cell, however, staff did not use a figure four leg lock whilst relocating the prisoner and the prisoner was able to continue resisting staff. This resulted in a second instance of use of force.</p> <p>The individual in question for both of these incidents was involved in a significant number of staff assaults around the time of these events occurring. Any movement of the prisoner was challenging and carried a high degree of risk. Following the incidents identified above, to mitigate this risk, SERT were tasked with overseeing all movements for this prisoner. This role included SERT supporting staff to safely move the prisoner using mechanical restraints as well as the provision of on the job support and training to ISU and movements staff. This approach continued for several weeks and reduced the risk to both staff and the prisoner. As a result, staff confidence in safely moving the prisoner grew and the number of spontaneous use of force incidents decreased.</p> <p>Finally, we would like to note that the use of force in high pressure scenarios is always an area of reflection and further review for our sites. In this case, while staff missed applying expected techniques in two instances, we do not consider that the techniques used were 'unapproved'. This wording infers a breach of control and restraint practices and we take this very seriously when talking about use of force incidents.</p>

Recommendation	Accept/ Partial/ Reject	Corrections' Response
<p>3. Prisoners in the ISU are held in cells that meet the Department' standards for natural light.  <b>This is an amended repeat recommendation (refer 2017 1f)</b></p>	<p>Accept</p>	<p>Corrections acknowledge that it is disappointing that we were unable to progress a new, modern ISU build, as discussed in our response to your office in 2017. Whilst we acknowledge that there are some current constraints with the facilities referenced, we note the good work that has occurred in the ISU to date, to enhance the physical ISU environment. The 2021/22 Financial Year Capital Planning process is currently underway. The need for resource to further improve the CMP ISU environment has been raised as part of this process.</p> <p>In addition to the above, the Corrections' National Office Mental Health Team have published guidelines to support enhanced physical environments of ISUs. This includes noise, lighting, colour and designs of the ISUs. These guidelines were published at the beginning of August 2020 and provide guidance for new builds as well as potential changes to existing builds. Although, it is important to note that these guidelines focus more on the aesthetics of the ISU in order to provide a more therapeutic environment.</p>

Recommendation	Accept/ Partial/ Reject	Corrections' Response
<p>4. Measures be undertaken to better protect the privacy of prisoners in the ISU when they are naked, partially naked, or undertaking their ablutions. <b>This is an amended repeat recommendation (refer 2017 1g)</b></p>	<p>Partially accept</p>	<p>CMP take steps to ensure the highest levels of privacy for those residing in the ISU. This includes the appropriate male to female staffing ratio, the careful positioning of the cameras in the cells and maintaining the dignity of people in our care whilst they are showering or are in a state of undress. In addition to this, CMP are currently exploring options for new ISU doors which will in part, offer further privacy to prisoners in the ISU.</p> <p>As your office is aware, the Chief Custodial Officer produced a research paper to inform future actions for enhancing privacy for prisoners in ISUs. In early 2019, we provided your office with the completed paper, for consultation. You provided your feedback in late 2019, which relevant teams at Corrections have been considering. The regulatory prohibition on privacy screening considerations are ongoing and as a result, there may be some enhancements to facilities or a change in current procedures regarding the use of cameras which will work to further improve privacy for prisoners. Unfortunately, we are not currently in a position to provide concrete timeframes for these next steps.</p> <p>Regardless, ISU custodial staff are supported to work in ways that are trauma informed and people-centric, in order to uphold patient's dignity whilst in the ISU. Corrections' Learning and Development team have created 'Trauma Informed Care' workbooks to assist staff when working with patients, this includes consideration of dignity and respect of patients.</p>

<p>5. Meals should be served at normal hours. This would involve lunch being served any time between midday and 1.30pm and dinner to be served any time between 5pm and 7pm. <b>This is a repeat recommendation (refer 2017 1k)</b></p>	<p>Partially accept</p>	<p>As your office is aware, the current staffing levels per shift and shift patterns do not allow the serving of meals at any other times. Corrections have acknowledged in past responses to your office that there are certain limitations to the current eight-hour shift structure in issuing meals to prisoners, conducting muster checks and the lock up times.</p> <p>Corrections consider that your inspectors finding on page seven that prisoners in one unit are delivered dinner at 3.20 pm, is not expected practice. CMP have completed some work with the kitchen which has resulted in meals being sent to the unit at 4pm, instead of 3.20 pm. Whilst not perfect, this is a good first step prior to the implementation of Making Shifts Work.</p> <p>CMP think it is important that the men take some responsibility for when they would like to eat their lunch. Although lunch is provided to prisoners when it arrives in the units, as it is a cold meal, individuals can choose to eat it at a time that suits them. This provides the men with more responsibility and is in line with what would be expected in the community.</p> <p>As your office is aware, Making Shifts Work has been an ongoing project that will influence the timing of prisoner meals. Making Shifts Work is a partnership project with the Department of Corrections, the Corrections Association of New Zealand and the Public Service Association to improve staff wellbeing, safety and operations in our prisons. As part of the project Corrections have established a standard of normalised meals, with no more than 14 hours between dinner and breakfast, seven days a week. This will be enabled by longer shifts in residential units for our custodial staff. Manawatu Prison was the first site to adopt the change on 13 July</p>
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Recommendation	Accept/ Partial/ Reject	Corrections' Response
		2020. Otago Corrections Facility implemented the change from 24 August 2020, followed by the remainder of our prisons in a structured roll-out over the next few years.

<p>6. Action is taken to ensure all prisoners are able to access at least one hour of exercise in the open air daily.</p>	<p>Accept</p>	<p>CMP takes its obligations under section 70 of the Corrections Act seriously. CMP are undertaking ongoing work to strengthen the recording of information and rationale if minimum entitlements are denied for prisoners. Initial practice discussions occurred with staff at the time of your inspectors visit to CMP, and expectations around minimum entitlements and the recording of minimum entitlements were reiterated during the COVID-19 pandemic response. With recent changes in alert levels, further practice discussions on this subject occurred to reinforce expectations with staff. Whilst work in this area is ongoing, as it is more focused on continual improvement, we do not consider that any further action is required in response to your recommendation.</p> <p>To provide some further context to your recommendation, the prisoner that is being referred to (that was not provided an hour daily in the open air), is a highly complex individual to manage. He has assaulted staff on numerous occasions and during your inspectors visit, his behaviour was at a point where he was assaulting staff at every opportunity available. The Site Emergency Response Team were present for all engagements in an attempt to de-escalate the situation. Given the significant risk to staff safety, as well as the dignity of the prisoner, the safest option was for the prisoner to remain in his cell. The CMP Prison Director discussed this individual with your inspectors when they were on site and highlighted some of the difficult complexities of his management.</p> <p>We consider that your inspectors' finding on page eight that minimum entitlements were being denied to obtain prisoners' compliance is a misinterpretation of the purpose behind the individual mentioned above remaining in his cell. The individual remaining in his cell was not evidence of a punishment tool to gain compliance, rather, the risk that the individual posed to the safety and security of the prison (as well as to</p>
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Recommendation	Accept/ Partial/ Reject	Corrections' Response
		himself) was deemed too great and outweighed him leaving his cell (on occasion).
7. The RO improve the accessibility of notices and key information for prisoners. <b>This is a repeat recommendation (refer 2017 2b)</b>	Accept	Following the initial feedback from your inspectors, Receiving Office staff have displayed additional information notices in the Receiving Office. These notices include key information about the Receiving Office and their processes with prisoners. We consider that this recommendation has been actioned and is complete.

<p>8. Prison management review induction arrangements for those with literacy issues and improve these arrangements to ensure these prisoners are fully briefed on Prison procedures. <b>This is an amended repeat recommendation (refer 2017 2c)</b></p>	<p>Accept</p>	<p>CMP have recently established a ‘first night’s unit’ which focuses on the induction and future unit placement of prisoners. Staff in this unit spend time with the prisoners ensuring that they understand relevant processes and expectations at CMP. Case Management and Education tutors also meet with new prisoners within their first seven days at the prison which supports any literacy concerns to be followed up on. New arrivals are also seen by Health Services and the chaplain (if they choose to) during this time. A new induction booklet has been developed and is provided to all new arrivals to refer to for key information.</p> <p>Discussions are underway around what further support can be provided to sites with regards to inducting individuals with literacy issues. At a site level, staff generally talk individuals through relevant induction materials, ensuring understanding as they go, however, further thought is being given to digital or visual aids for these individuals. This will require consideration from a number of teams at National Office, in accordance with sites. At this stage, these discussions are still in a preliminary stage.</p> <p>When prisoners are moved to the High Security units, they are provided an induction booklet that staff talk them through. This booklet highlights specific rules and procedures for the unit.</p> <p>CMP staff continue to make use of the telephone translation services (Ezispak) as it is the most accessible option available to support prisoners.</p> <p>As your office is aware, Corrections have been working with Translation Services at the Department of Internal Affairs with the view to have key documents relating to the reception and induction process of prisoners (including at risk assessments) translated into other languages. This work</p>
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Recommendation	Accept/ Partial/ Reject	Corrections' Response
		<p>is ongoing, initially it is envisaged that we will trial translated material in several languages at a couple of prison sites to test that we have covered all the necessary information and have conveyed the information in a user-friendly way to the intended audience. We are not yet able to propose an expected timeframe for completion of this work although as noted in our response to your Waikeria Prison OPCAT report, we recently extended the scope of this work with the provision of information in Te Reo Māori and NZ Sign Language.</p> <p>Once implemented, this resource will, as with EziSpeak assist staff in their duties and people in Corrections' care.</p>
<p>9. The distribution of meals is supervised by custodial staff. <b>This is a repeat recommendation (refer 2017 2c)</b></p>	<p>Accept</p>	<p>CMP see value in this recommendation and acknowledge that there should be an increased level of supervision from staff when meals are being distributed. However, we do not necessarily agree that a consistent approach should be applied to all units across the site. In a lower security environment, there is an emphasis on higher trust activities, including prisoner meals. In High Security units, we agree that staff supervision is an important tool to ensure the safe and secure management of the prison. We think it is important that there is a flexible approach to supervision (including for meals) that reflects the environment of the unit, and that a 'one size fits all' approach is not necessarily the right focus.</p> <p>I can confirm all evening meals are supervised by staff to ensure that every prisoner gets a hot meal each night. CMP management are working with unit staff to ensure that all meals include staff oversight. This includes lunch and breakfast. Staff supervision of meals is already well managed in the High Security Units.</p>

<p>10. The Prison makes greater efforts to engage with local iwi to better support the needs of Māori prisoners. <b>This is a repeat recommendation (refer 2017 2e)</b></p>	<p>Accept</p>	<p>It is recognised by CMP that more can be done to engage local iwi to better support the needs of Māori prisoners. There are initiatives that are currently being implemented which aim to improve local relationships. The CMP Prison Director is part of the Otautahi Maori Leadership Board that meets quarterly with local rununga representatives, Kaiwhakamana representatives and Corrections leaders. The purpose of the board is to strengthen the connection with local iwi representatives and to seek support for initiatives to deliver better outcomes for Māori prisoners.</p> <p>One of the results of the work that CMP are undertaking with local iwi to enhance relationships is the introduction of representatives from He Waaka Tapu (a Kaupapa Māori health and wellbeing services) at CMP, who are working with men in the community, as well as in CMP.</p> <p>Importantly, Corrections have an active partnership with iwi at other Christchurch prison sites, for example, Christchurch Women’s Prison and Ngai Tahu embarking on a co-design process for Mana Wahine units at Christchurch Women’s Prison. Noting the strength of our partnerships with iwi across the region, CMP (with support from our Corrections’ Māori Services team) are focused on strengthening their own partnerships.</p> <p>CMP are being supported by the Corrections’ Māori Services teams to continue to work to establish a collaborative, working relationship with local iwi. A representative from the Corrections’ Māori Services team and the CMP Prison Director are now meeting on a fortnightly basis to explore ways in which they can strengthen not only the relationship with iwi, but all Kaupapa Māori and cultural support initiatives on site. This will be an ongoing focus for CMP.</p>
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Recommendation	Accept/ Partial/ Reject	Corrections' Response
11. High-security prisoners spend more time out of cells engaged in purposeful activities. <b>This is a repeat recommendation (refer 2017 2g)</b>	Accept	<p>In July 2020, some changes were made to the composition of the High Security units. Prisoners were moved to units that align more with their respective behaviours which means that their routines are more aligned and are more supportive of safer, longer unlock hours. This change means that high security prisoners are spending more time out of their cells, and during this time, they have access to programmes, education opportunities, the gymnasium and recreational activities. Further activities include three visits a week with family and friends for prisoners in the remand units, library and chapel visits.</p> <p>With the existing physical space in the units that these prisoner movements have freed up, the high security units are also looking at introducing more 'hobby' type classes for prisoners to engage with during their unlock time.</p>
12. Mould in 'single double' cells is removed as a matter of urgency. <b>This is a repeat recommendation (refer 2017 2j)</b>	Accept	<p>CMP note your inspectors' finding and have an ongoing programme of maintenance to ensure that facilities are up to standard. Further robust cleaning routines have been implemented which include daily cleaning and weekly assurance checks.</p> <p>In addition to this, contact has been made with our maintenance contractor to assess the mould and replace all of the grout in the shower areas that is showing signs of mould. This is part of the ongoing maintenance schedule, however given the ongoing uncertainty around COVID-19 alert levels, we are unable to provide a specific timeframe that the maintenance contractor will be able to access the site. Despite this uncertainty, priority will be given to ensuring that this occurs.</p>

Recommendation	Accept/ Partial/ Reject	Corrections' Response
13. 'Single double' cells should revert to single occupancy. <b>This is an amended repeat recommendation (refer 2017 2k)</b>	Reject	<p>Every effort is made to retain these cells as single occupancy, and they are only used as a last resort, to accommodate prisoners when the prison population demands.</p> <p>Corrections do not have a straightforward option to replace the beds that would be lost, if these cells were reduced solely to single occupancy. This is important as CMP have to be in a position to accommodate remand accused individuals as they arrive on site. Whilst we are unable to foresee future prison population numbers, it is critical that we take a cautious approach to beds to ensure that if numbers of arrivals increase again, we are able to safely accommodate individuals.</p>

<p>14. An annual health needs analysis be carried out to inform the health development plan and funding. <b>This is a repeat recommendation (refer 2017 5a)</b></p>	<p>Accept</p>	<p>Ongoing work that looks to strengthen the current Health Services work plan (through the development of a work programme) will include two critical pieces of work. This works considers the alignment of Hōkai Rangi to Hōkai Nuku implementation plans (July 2020 to 2022):</p> <ol style="list-style-type: none"> <li>1. Revisiting our Health Services vision and purpose and the development of a Health Services and Wellbeing plan (HSWP)</li> <li>2. A key building block of the HSWP will be the enabling of a health needs analysis (for all people in our care).</li> </ol> <p>A key piece of work that has commenced throughout our COVID-19 environment is the improvement in how we can capture and understand our most vulnerable people across the country. Our plan is to further this work to develop automated reporting that will provide a point in time visibility of our people’s health needs with a longer-term goal of using this analysis to better inform recruitment, workforce capability needs and future funding. We are looking to standardise data capture to ensure continuous visibility of the health needs of those in our care – captured through improved data capture and analysis. Additional health needs analysis through qualitative measures will support this – however will not be conducted annually.</p> <p>The recent strengthening of both the National and Regional health services teams includes the introduction of a Deputy Chief Executive Health, whose team includes a Chief Nurse, Chief Medical Advisor, Chief Maori Health Advisor, Director Mental Health and Addictions roles in National Office and Regional Operations Directors for Health Services. This strengthening has also included the recruitment of a new Business Solutions Manager, who will enhance the manner in which Health Services data is captured and utilised.</p>
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<p>15. Prisoners be made aware that there is a separate health complaint process to ensure patient confidentiality. <b>This is an amended repeat recommendation (refer 2017 5b)</b></p>	<p>Accept</p>	<p>The Patient Complaints Policy has recently undergone review. Currently people in our care have access to a separate complaints form (HS2.4.4) which provides an opportunity for a complaint to be made without custodial intervention. However, due to duplication with other complaints processes (such as PC01 complaint forms) this has resulted in some confusion for patients as to what channel a health complaint should progress through.</p> <p>In August 2020 the policy was reviewed by the Corrections Health Leadership Team with agreement that the policy needed to simplify the complaints process and ensure that the resultant health process supports patient privacy. Once drafted, the policy will be released as an interim policy so that improvements can be made to the process during a trial phase. This will include establishing a mechanism for electronically collecting, recording and tracking health complaints.</p> <p>In conjunction with the release of this interim policy, communication with people in our care will be undertaken to encourage the use of the new health complaints process. Communication to health services staff at all prisons to ensure they have an understanding of the process and know how to support prisoner uptake will also be completed.</p> <p>It is forecasted that the interim policy will be released in the first week of September 2020.</p> <p>At a site level, CMP are aware of the importance around separate health complaint processes to ensure patient confidentiality and are committed to making immediate changes. CMP are trialling a new system that separates the health complaints from the PC01 complaints from 24 August 2020. This will sit alongside the interim policy work identified above, which is being led by the Health Services National Office team and will operationalise these changes for the site.</p>
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Recommendation	Accept/ Partial/ Reject	Corrections' Response
<p>16. Nurses have access to clinical supervision. <b>This is a repeat recommendation (refer 2017 5c)</b></p>	<p>Accept</p>	<p>Earlier this year a new policy, 'Supervision for Nurses' was developed by the Corrections Health Leadership Team, in consultation with the New Zealand Nurses Organisation. Regional Operations Directors Health are responsible for establishing supervision arrangements in their respective regions.</p> <p>In the Southern Region, a contract for one-on-one Professional Supervision for Health Centre Managers and Clinical Team Leaders has been in place since June 2020. Further work to secure a provider to offer group supervision for nurses is ongoing. Potential providers have been contacted to offer expressions of interest with a closing date of 27 August 2020. It is anticipated that nurses will be able to engage in group supervision by November 2020, along with the capacity for one to one supervision as required.</p>

<p>17. Processes and practices for storing and administering controlled medication, comply with Corrections' Health Services Medication Standards. <b>This is an amended repeat recommendation (refer 2017 5d)</b></p>	<p>Accept</p>	<p>The current practice for storing controlled medication is as follows:</p> <ul style="list-style-type: none"> <li>• Controlled medication is blister packed with two identifiers on the packaging, as well as the date for administration.</li> <li>• Two nurses check controlled medication in and out of the Controlled Drug Safe &amp; enter the medication in the Controlled Drug Register as per Policy (Sections 20.22, 20.23 of the Medicines Management Policy).</li> <li>• Prior to administration, controlled medications are signed out by a Registered nurse and another authorised Health Services individual. Ideally two Registered Nurses will sign out the controlled medication in the register and re-secure/lock medications in the controlled medication safe until the time of administration to patients.</li> </ul> <p>CMP accept that the controlled medication safe must be secured at all times outside of controlled drug preparation, even if staff are working in the area. To remind nurses of the importance of this, a practice reminder was issued to all nursing staff on 6 and 7 August 2020. Further, education led by the contracted pharmacy, relating to controlled drugs occurs with CMP nursing staff every six months. The next session is scheduled for early September 2020.</p> <p>The Medicines Management Policy was released in 2018. Due to several positive improvements and modifications to practice, the Medicines Management Policy has been identified as requiring a further review. This review will commence in September 2020 and is expected to be completed by the beginning of December 2020.</p> <p>Medication Management Practices have been audited previously and have now been included as part of the new National Audit Programme, which</p>
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Recommendation	Accept/ Partial/ Reject	Corrections' Response
		<p>will be rolled out in early September 2020. All audits are reviewed by the Regional Operations Directors Health and are reported to the Corrections' Health Leadership Team. This provides for a continuous improvement approach in several health practice areas.</p> <p>In addition to the above, the Health Quality and Practice team are currently undertaking a thematic review of medication incidents across the Department to identify areas that require improvement and to help inform the development of audits to provide assurance that the practice reflects policy. This review will be presented to the Health Services Leadership team on 16 September 2020.</p> <p>A project to implement an electronic medication administration process has been initiated, with the aim that an electronic solution will be introduced to sites. Unfortunately, initial work on this project had been delayed by COVID-19; however, this work is now underway again. The current proposed timeline will see an initial pilot being run at Hawkes Bay Regional Prison in late 2020, with a roll out to all other sites by early to mid-2021.</p> <p>Another focus area is e-prescribing, which will improve the way in which controlled drugs are prescribed and managed as part of medication rounds supported by the new technology. E-prescribing will first be implemented at Hawkes Bay Regional Prison as the chosen pilot site. It is expected that e-prescribing will be fully operational across our prison estate by the beginning of November 2020.</p>

Recommendation	Accept/ Partial/ Reject	Corrections' Response
<p>18. The information leaflet for visitors should be reviewed to better reflect the Prison's focus on supporting positive family relationships. <b>This is a repeat recommendation (refer 2017 7a)</b></p>	<p>Accept</p>	<p>CMP are pleased to note your mention of their focus on fostering positive relationships with prisoners' family's. CMP are currently reviewing the visits area to identify enhancements. The visitor's booklet will be included in this review.</p> <p>Recently, CMP received some positive feedback from family of a youth prisoner, on the information brochure for visitors to the Youth unit. This leaflet will be adapted to ensure it is appropriate for the whole site and will include information regarding visits. It is expected that this leaflet will be completed by December 2020.</p>
<p>19. Measures be taken to ensure that all prisoners can access the telephone. <b>This is an amended repeat recommendation (refer 2017 7b)</b></p>	<p>Accept</p>	<p>The finding behind this recommendation describes some prisoners monopolising telephones through extended telephone use. Your inspectors note that this results in unequal access to telephones for prisoners. We agree that all prisoners should be able to access the telephones when they need to. Staff are vigilant in monitoring this sort of behaviour from prisoners and any misuse of the prisoner telephone system is reviewed and followed up on in a variety of ways, for instance, through misconducts or formal warnings.</p> <p>We do not consider that this issue is systemic, and staff will take appropriate action with individuals when this behaviour presents itself.</p> <p>In an effort to further enhance prisoners' contact with family and friends, CMP have rolled out video visits to all prisoners, to increase their opportunity to speak with individuals external to the prison.</p>

<p>20. There should be greater opportunities for constructive activities for remand accused prisoners. <b>This is a repeat recommendation (refer 2017 7c)</b></p>	<p>Accept</p>	<p>The provision of further activities for remand accused prisoners is an ongoing focus for CMP. CMP have recently changed the composition of individuals in the remand units. Individuals were placed in units that align more with their respective behaviours which means that their routines are more aligned and are more supportive of safer, longer unlock hours.</p> <p>Further, all prisoners, including Remand and High Security prisoners, can have access to the following interventions if there is a programme running in the unit they reside in:</p> <ul style="list-style-type: none"> <li>• Education assessment and Learning plans – developed by the Education Tutors</li> <li>• Intensive Literacy and Numeracy classes</li> <li>• Weekly library visits and deliveries</li> <li>• Art classes</li> <li>• Drivers Licence renewal and testing</li> <li>• Work Safe</li> <li>• Health and Wellbeing</li> <li>• Problem Gambling sessions</li> <li>• Tikanga Programme</li> <li>• Te Reo Classes</li> <li>• Parenting</li> <li>• Brainwave</li> <li>• Short Vocational Courses: Traffic Controller, Site Safe, First Aid</li> <li>• CV and Interviewing</li> </ul> <p>CMP also have a new contract with He Waka Tapu for ‘Out of Gate Services’ and a new Remand Reintegration Programme (RRP). The RRP is a five-session programme focused on Te Whare Tapa Wha and looks at ways that remand accused, and remand participants can maintain a healthy and</p>
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Recommendation	Accept/ Partial/ Reject	Corrections' Response
		<p>balanced lifestyle. It is expected that the first programme will commence by early to mid-September 2020 (dependent on COVID-19 alert levels).</p> <p>Corrections are also looking to establish a contract for the delivery of a Head Start Programme (focusing on behavioural skills) for those who are remand accused. The current Head Start programme (delivered to sentenced prisoners) is being tailored to the remand population which will mean it will be different to that currently delivered to sentenced prisoners. Work in this area is ongoing.</p> <p>This financial year, CMP are looking to introduce some more vocational programmes in the Remand and High Security areas. Specifically, CMP have been looking at courses that can be used towards accrediting prisoners in the New Zealand Certificate in Occupational Safety and Health. This is a useful qualification for men who are planning to work in employment where occupational safety and health is critical. CMP are also exploring options to introduce some basic computer courses in the Secure On-line Learning Suites. One of these would be held for remand and remand accused individuals.</p>

Recommendation	Accept/ Partial/ Reject	Corrections' Response
21. Remand prisoners should have longer periods out of their cells on a daily basis. <b>This is a repeat recommendation (refer 2017 7d)</b>	Accept	As noted in the response to recommendation 11, in July 2020, a number of prisoners of varying classifications (both sentenced and individuals on remand) were moved to align the units in a way that provides prisoners greater time out of cells and in the units/yards. This has been achieved by grouping smaller numbers of prisoners together (in accordance with managing prisoner dynamics and gang connections) or in some cases, having larger numbers of prisoners mixing in a unit where it has been deemed appropriate. This has resulted in all prisoners (including individuals on remand) having longer periods of time out of their cells, as it is safer and more operationally viable to do so. We therefore consider that this recommendation has already been achieved.
22. Toilets and showers in exercise yards should be better maintained. <b>This is a repeat recommendation (refer 2017 7i)</b>	Partially accept	<p>Good cleaning and hygiene practices at prisons are crucially important, and CMP consider the showers and toilets were in good working order at the time of your inspectors' visit. They also consider that the facilities were clean and tidy when your inspectors were visiting, and the privacy screen upgrade had been completed just prior to the visit.</p> <p>CMP already have an ongoing programme of general maintenance and cleaning to ensure that facilities are maintained to the expected standard and this will continue to occur. CMP will continue to monitor these facilities to ensure that they meet the expected hygiene and cleanliness standards.</p>

<p>23. Re-integrative services are further developed.  <b>This is a repeat recommendation (refer 2017 8b)</b></p>	<p>Accept</p>	<p>CMP are continuously focused on providing opportunities for further re-integrative services. To evidence this, we thought we would provide you with some further information that is not necessarily reflected in your draft report. CMP currently have the Navigate Programme, led by Pathways which is a reintegration programme run in Self-Care units. This programme allows prisoners to go shopping, apply and sit the relevant tests for a driver’s license, organises visits to release accommodation and other guided release opportunities and offers release to work opportunities. This course focuses on teaching life skills and is open to 20 individuals. The course is always full, with staff supporting prisoner uptake. Importantly, the CMP Prison Director put your inspectors in touch with the Navigate Programme Manager during their visit to discuss this course in further detail.</p> <p>The Out of Gate programme has a new provider, He Waaka Tapu which have expended this service at CMP. The eligibility criteria to access this service has been broadened with longer term options and a variety of support offered to prisoners.</p> <p>CMP also engage prisoners in Guided Release and Release to Work opportunities. The prisoner is first assessed as being suitable to engage with these opportunities and then decisions are made around work placements and appropriate locations for guided releases.</p> <p>We note your inspectors’ finding that both Release to Work and Out of Gate were not in operation at the time of your inspectors visit. We consider this statement to misrepresent the nature of these programmes. There are times where Release to Work uptake is limited due to candidates not meeting the eligibility criteria, or there being limited</p>
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Recommendation	Accept/ Partial/ Reject	Corrections' Response
		<p>employment opportunities. However, Corrections employ Release to Work brokers across the country to ensure that opportunities for employment are sought out and are available to suitable candidates. Out of Gate is always available (regardless of the provider), with the case management team referring individuals as appropriate. Whilst prisoner uptake of these programmes may not have been reflected during your inspectors' visit to CMP, these programmes have always been available and are currently being offered to suitable prisoners at CMP.</p> <p>CMP have a strong relationship with the Salisbury Street Foundation and other prisoner release supported accommodation. This relationship has been a focus for CMP to ensure that prisoners are prepared and comfortable with their release plan.</p> <p>Although specific to Matapuna (a Special Treatment Unit) at CMP, it is important to note that Matapuna has its own reintegration representative who supports prisoners with pre-release needs, such as facilitating guided releases and making referrals to supported accommodation providers.</p> <p>CMP will continue to consider avenues for enhancing reintegrative services for prisoners, however this will be done on a continuous improvement basis, and will not be subject to just one action going forward.</p>

Recommendation	Accept/ Partial/ Reject	Corrections' Response
<p>24. Funding for furnishings and recreational equipment should be provided. <b>This is a repeat recommendation (refer 2017 Youth Unit a)</b></p>	Accept	<p>CMP are focused on developing a system for maintaining the current facilities and equipment in the Youth unit. This will also include (where appropriate) the replacement of furniture and equipment, however this is more about staff remaining vigilant about maintenance of the current facilities to ensure prisoners are not causing damage to furniture and equipment.</p> <p>There is a renewed focus on the cleanliness and usability of the youth unit, as well as supporting youth prisoners to look after their own cell. Staff in youth units are particularly focused on encouraging prisoners to take pride in maintaining their cell and the larger youth unit as a whole (including furniture and equipment); this is an ongoing focus for CMP.</p>
<p>25. The issue of excessive tagging is addressed. <b>This is a repeat recommendation (refer 2017 Youth Unit b)</b></p>	Accept	<p>CMP continue to work to ensure that facilities are clean and free of graffiti, however, at its core, this is an ongoing issue of prisoners damaging prison property. As a result, CMP are exploring options for enforcing sanctions with prisoners who are found to be damaging prison property. Options being considered include the enforcement of a misconduct.</p> <p>Notwithstanding this, tagging in the Youth unit will be removed. Timeframes for completion of this work are dependent on the arrival of paint and materials required to remove the tagging, however, the National Office property team have completed an onsite review of the Youth unit and this work will be progressed at pace.</p>

Recommendation	Accept/ Partial/ Reject	Corrections' Response
26. The dispensation for youth to mix should be reviewed to ensure it has legal effect. <b>This is a repeat recommendation (refer 2017 Youth Unit c)</b>	Accept	<p>As advised in our response to your OPCAT inspection report for Hawkes Bay Regional Prison, Corrections accept that there is no formal exemption document in place for both youth units. There is operational instruction in the Prison Operations Manual (POM) which supports current practice at both sites operating youth units.</p> <p>In response to your recommendation at Hawkes Bay Regional Prison we initially undertook to consider an exemption for each unit. We subsequently determined a broader approach that allows consideration of any future unit operating for youth was more appropriate and this work is underway. We look forward to providing your office with a copy of the completed work in a month.</p>
27. Notices about the complaints process are displayed in the unit. <b>This is a repeat recommendation (refer 2017 Youth Unit d)</b>	Accept	<p>CMP have made a significant effort to ensure that notices about the complaints process are displayed in the Youth Unit. Unfortunately, prisoners often remove posters from around the units and despite efforts to stop prisoners from doing this, it can still occur. Youth unit staff are vigilant at replacing notices in the unit and will continue to do so. Youth unit staff are aware of your inspectors' findings and were reminded of the importance of keeping up with replacing notices and posters in the Youth Unit.</p>

Further comments:

Page 6 – You note that your inspectors' discussions with staff indicated that there was not a consistent or robust process for staff selection to work in the ISU. You further note that some staff had expressed an interest in the role, which others had been rostered to work in the Unit despite having no prior knowledge of the ISU. This resulted in a partially achieved for recommendation 1i.

All staff that are on the permanent ISU roster have completed an expression of interest in the role. These staff are chosen for their passion and relevant skills to work in the ISU. Given the nature of a large organisation, there are sometimes shifts in staffing that need to occur; however, this is only short term. Long term, there is a permanent number of staff working in the ISU who genuinely want to be there. Staff in the ISU are supported through the provision of guidance from the ISP team.

Recommendation 3h on page 11 – The inspectors included J Block as part of their considerations on this recommendation, which is not considered to be a general High Security unit. J Block is a management style unit that men are placed in while on segregation or management plans, meaning it needs to be considered in the same context as Miro unit. This means that a consistent routine cannot be applied across these units as they are not operating in the same way.

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<sup>1</sup> While the ISP project has ended, CMP is still considered a “pilot site”, meaning they have pathways and resources in place that do not exist at non-pilot sites.