

## The Department of Justice Comments

### **Introductory Comments**

The Department of Justice (the Department) thanks the Custodial Inspector for the opportunity to comment on the draft Custody Inspection Report.

Set out below is the Department's initial response to each recommendation (noting that the Department has reviewed a draft of the report only and that final recommendations may be amended).

Many recommendations have been supported in principle, with more detailed work to be done to assess the feasibility and cost of implementation. The Department is not in a position to provide a final response to recommendations that require significant funding and consideration through normal Government budget processes.

In addition, the Department notes that much of the commentary in the Report relies on anecdotal evidence. Without detracting from the significance of the issues raised in this manner, further investigation will be required into some of these matters.

The Department has, however, provided an initial response where initiatives are already underway within the Tasmania Prison Service (TPS) or where recommendations relate to operational issues and do not require significant funding.

As the draft report notes, given the passage of time since inspections commenced, many of the recommendations have already been addressed, and significant work has been undertaken across the custodial environment in this regard. A considerable amount of work is also underway on numerous other recommendations. In addition, a number of initiatives relevant to multiple recommendations have been implemented or are being progressed. These include:

#### **Remission**

There are references throughout the draft report to remission of sentence and the associated TPS policies and procedures. The Department acknowledges that its remissions policy requires updating and it will consider the other issues raised in relation to remission.

However, it is worth noting that the Government is progressing legislation that will significantly amend current remission laws.

#### **Calculation of Prisoner Sentences**

The TPS is implementing a number of initiatives to enhance efficiency and improve procedures in relation to processes for obtaining, entering and validating sentence and remand orders and calculating release dates. The calculation of sentences can be incredibly complex and may involve multiple sentences, suspended or partly suspended sentences; they may be concurrent or consecutive, and with or without eligibility for parole.

The Sentence Administration Unit is now based at the Risdon Prison Complex. It has been under development since 2018 and officially commenced operation on 4 March 2019. The Sentence Management Division has assumed overall management for a number of pre-existing areas of the TPS, including the Sentence Management Unit. It is anticipated that the new structure will boost efficiency and assist in the development of robust written procedures and policies in relation to sentence calculations to ensure calculations are delivered to the highest standard.

The Sentence Management Division is currently drafting an Operating Manual and will also progress the delivery of specialised training to staff working with the Division.

In addition, from July 2018, changes were introduced to enable orders to be better understood by offenders and others involved in proceedings, as well as allowing the information contained in orders to be more efficiently processed.

The *Sentencing Amendment (Sentences of Imprisonment) Bill 2017* passed both Houses of Parliament in late 2017. The legislation sets out a range of details that need to be contained in a sentencing order, including specifying any non-parole period that the offender must serve and whether multiple sentences are to be served concurrently or cumulatively.

Those changes were not intended as a reflection on the excellent work done by the judiciary, but intended to ensure that the information provided through sentencing orders is clear and consistent.

### **Justice Connect**

The Justice Connect project will also enhance the calculation of prisoner sentences. Justice Connect will provide a comprehensive case management system for the Courts, while also ensuring the supply of accurate and timely data between all criminal justice agencies in Tasmania, including the TPS and Tasmania Police. In particular, automated calculation and real time online transfer of sentencing data is a core deliverable of the Justice Connect Program, which has been funded in the 2019-2020 budget.

Justice Connect will replace current outdated systems with an integrated end-to-end system solution. It will provide a contemporary system to enhance efficiencies and inform policy through better information sharing and access to timely and trusted information.

### **Prison Infrastructure**

#### Specialised Accommodation Units

The Department notes the recommendations in relation to separate specialised accommodation units for protection prisoners including sex offenders, transgender prisoners, young offenders and transitional accommodation for female prisoners.

The Department must work within its resources and available facilities and does not believe it is practical in a small jurisdiction like Tasmania to have such accommodation facilities for all prisoner cohorts.

The Government has set its infrastructure priorities for the immediate future and additional information is outlined below.

The TPS will also continue to work closely with Correctional Primary Health Services and other areas of the health system to meet the needs of prisoners with serious disabilities, mental and physical health conditions.

Prison populations across the country are increasing, and the Government has acknowledged that it is not immune from this national trend. Several significant infrastructure projects have been announced that will assist the TPS to address the recommendations in the Custodial Inspector's draft report.

The Government has committed more than \$340 million for two major prison infrastructure projects, including a new Southern Remand Centre and a 270 bed prison in the North of the State.

#### Northern Prison

The new Northern prison will ultimately provide accommodation for a variety of security classifications, including remand facilities and a women's prison. It will relieve pressure on the Risdon facility, improve family connections for Northern prisoners, increase opportunities for prisoners to find meaningful work on release and provide dedicated accommodation for remandees.

The first stage allocates \$150 million to house 140 prisoners. The second stage allocates a further \$120 million to house 130 prisoners.

#### Southern Remand Centre

Funding of \$79.3 million has been committed to facilitate the construction of a new Southern Remand Centre at the Risdon site. The new remand facility will provide dedicated accommodation for remandees and facilitate improved access to services.

Stage 1 will comprise two accommodation units housing a minimum of 140 male remandees and preliminary works have commenced. Stage 2 will include upgrades to shared central facilities within the Risdon Prison Complex, including the gatehouse, prisoner processing area, health centre and visits centre. A key focus of the Department's planning efforts has been the development of a more effective prison design philosophy for the Tasmanian prison system. The design of the new Southern Remand Centre will provide a positive environmental experience for staff and remandees, and will support effective and efficient prison operations.

#### O'Hara Cottages Expansion

Funding of \$1.5 million over two years from 2018-19 has been provided for the construction of four additional independent living units at the O'Hara Pre-Release Facility, increasing the capacity of this facility by 16 beds and reducing some of the current accommodation pressures on the Ron Barwick Minimum Security Prison.

#### Ron Barwick Minimum Security Prison Upgrade Project

\$3 million over two years from 2017-18 has been provided for the refurbishment of Division 7 in the Ron Barwick Minimum Security Prison. This funding also allows the Department of Justice to address some of the critical plumbing and electrical issues for this prison.

This project is being run in two stages. Phase 1 has already been completed. Phase 1 has seen the refurbishment of Division 7 to accommodate up to 40 minimum-rated prisoners, including prisoners with disabilities or special needs, including age-related needs. Division 7 now includes three disability access rooms, lift access to the unit and shared facilities that comply with contemporary accessibility standards.

Phase 2 will focus on additional critical infrastructure upgrades, including sewerage works and electrical upgrades.

#### New Facilities at the Mary Hutchinson Women's Prison

Capacity at the Mary Hutchinson Women's Prison has increased substantially with the construction of two new 10-bed accommodation units, providing 25 additional minimum security beds. The new facilities were officially opened on 21 October 2018 and include a purpose-built mother and baby unit, which accounts for the additional five beds.

#### Other Current Projects

A number of smaller, but still important, prison infrastructure projects are also underway including:

- Upgrades of the correctional facilities at the Launceston Supreme Court and Launceston Reception Prison - this project will ensure the upgraded cells meet the relevant Australian and international standards, and will support the handover of responsibility for prisoner escort and court security services from Tasmania Police to the TPS.
- An upgrade of the electronic security system and essential maintenance works at the Hobart Reception Prison.
- An upgrade of the prisoner telephone system.

#### **Recruitment**

The TPS continues to explore a range of strategies to minimise the likelihood of lockdowns in prison facilities, including through significant Correctional Officer recruitment.

Lockdowns vary in length and may be limited to a single unit. They can occur for a number of reasons and are an essential operational tool, utilised to ensure a safe and secure prison environment for prisoners, staff and visitors. Lockdowns may occur, for example, for security operations, medical escorts, staff training or maintenance.

A structured lockdown strategy was introduced on 18 February 2019 to manage the impact of frequent and unplanned lockdowns. This strategy endeavours to minimise and distribute the impact of lockdowns across units and facilities in a manner that maximises time out of cells for prisoners.

### **Dedicated Response Unit**

A Dedicated Response Team (DRT) has been developed to support the TPS objective of providing a safe, secure and constructive environment for prisoners to live in and staff to work in.

The DRT will improve the TPS's ability to prevent incidents from occurring by providing a presence in key and high-risk areas. Additionally it is able to respond quickly and decisively to any incident, minimising the risk of escalation and the risk of injury to staff and prisoners.

The staff selected have undergone significant training and selection processes to ensure they possess the mental and physical resilience and fitness required. Additionally they possess the aptitude to use the skills and accoutrements at their disposal in stressful situations.

### **Review of Director's Standing Orders (DSOs)**

The process to review all Director's Standing Orders commenced some time ago. Unfortunately, due to a number of staffing changes, this process has been delayed. However, the TPS is currently redesigning templates and undertaking preparatory planning to recommence this project by the end of 2019.

## Responses to Recommendations

Recommendation	Response/Acceptance Level
<p>1. That TPS implements measures to improve performance and accuracy in record keeping, particularly in relation to the maintenance of registers, including educating staff and introducing procedures to ensure quality assurance of documentation.</p>	<p><b>Supported - Existing Initiative</b></p> <p>Much has been achieved with respect to all aspects of this recommendation since the date of the inspection, and it can continue to be described as a work in progress. The ongoing development and implementation of our Compliance Framework will improve consistency in this area.</p>
<p>2. That TPS takes steps to address the physical environment in which prisoners are admitted in both reception prisons to ensure prisoner confidentiality is maintained.</p>	<p><b>Supported - Existing Initiative</b></p> <p>One cell at HRP has been identified to be converted into a Reception room. Staff are exploring options to improve this situation.</p>
<p>3. That TPS implements a procedure to ensure that prisoners' personal clothing items that are worn on admission to a facility are cleaned before being placed into the prisoner's property box</p>	<p><b>Supported</b></p> <p>The TPS is currently exploring options in this regard. MHWP, RBMSP, RPC and LRP all have laundry washing facilities and the HRP is currently seeking to install a washing machine and dryer in order to routinely wash clothes worn on admission.</p>
<p>4. That TPS explores options to allow, to the extent that it is practicable, daily visits for remand prisoners</p>	<p><b>Supported</b></p> <p>Visits are available every day at the HRP (but not every day at the Risdon site). This reform will be enhanced with the provision of the Southern Remand Centre.</p>
<p>5. That TPS introduces a broader range of short courses, and explores options for longer courses that can be broken down into stand-alone short units for remand prisoners</p>	<p><b>Supported in Principle</b></p> <p>Investigations will be conducted into the availability of suitable courses within existing budgetary constraints.</p>

Recommendation	Response/Acceptance Level
6. That TPS provides clear information to released prisoners regarding the options for collection of money held by TPS on their behalf	<p>Supported in Principle</p> <p>This recommendation will be addressed by the provision of information in alternative / accessible formats if required. This will include adding a permanent entry to 'The Insider' magazine; amending pamphlets held at Reception where required; and exploring the provision of a 'Getting Out' A4 sheet or business card with pertinent contact details including information about the collection of money on release.</p>
7. That TPS implements measures, and assigns resources, to ensure all prisoners, including those on remand, are case managed and assigned a planning officer	<p>Supported in Part</p> <p>This recommendation will be addressed as part of the planned internal review of case management. Support to remandees is not currently provided by a planning officer, but a Correctional Officer is allocated to case manage the immediate needs of all prisoners held on remand.</p>
8. That TPS introduces a formal risk assessment, and procedures to ensure it is completed, and recorded on the Custodial Information System, before allocating prisoners to share a cell	<p>Supported</p> <p>Further investigation into best practice examples from other jurisdictions (such as the UK's Cell Sharing Risk Assessment in Place tool) will be undertaken in order to inform our decision-making with respect to this Recommendation.</p>
9. That TPS implements a procedure/practice for removing a prisoner from the top bunk safely and provides training for all correctional staff in this area	<p>Supported</p> <p>A 'safe system of work' operational procedure has been drafted for removing a prisoner from the top bunk of a bunk bed. The draft includes training considerations.</p>
10. That TPS identifies and implements alternative strategies to managing challenging prisoner behaviour outside of using the prisoner classification scheme, whenever it is appropriate and possible	<p>Supported - Existing Initiative</p> <p>The current review of our Prisoner Contract System will address this Recommendation.</p>

Recommendation	Response/Acceptance Level
11. That TPS introduces a central body or person to coordinate the accommodation placement of prisoners in accordance with formally documented processes to ensure consistency in decisions	Supported - Existing Initiative Plans are well advanced for the introduction of a centralised vacancy management model.
12. That TPS introduces procedures to advise prisoners of the reason and the length of time in custody	Supported - Existing Initiative The introduction of the Sentence Management Division (SMD) has allowed the TPS to review all procedures in order to ensure that accurate information with respect to sentence length is provided to all prisoners.
13. That TPS undertakes a review of the quality assurance processes for sentence calculations to ensure that it is robust and not simply a 'tick and flick'	Supported - Existing Initiative This is underway as part of the response to Recommendation 12 above.
14. That TPS explores options to ensure that no prisoner is released without the means to pay for transport and some food	Supported in Principle The TPS is exploring the options in regard to this recommendation as it will have budgetary implications. It is noted that it will be practically difficult to provide payment to those released directly from courts.
15. That TPS implements alternate payment options to posting cheques to ensure that prisoners without a forwarding home address are able to receive any remaining balance from their TPS prisoner account without having to present at the Risdon site	Supported in Principle Payments are currently issued from LRP, Hobart and Risdon. If a prisoner identifies as having no forwarding address and is unable to present to LRP, HRP or the Risdon site, the TPS is prepared to make the payment to an alternative location, determined on a case-by-case basis. Options could include Service Tasmania, a local Post Office or a local Tasmania Police station.
16. That TPS revises and amends the <i>Remission Policy</i> as a matter of urgency to reflect the correct legislative references and update out of date information	Supported - Existing Initiative Work to address these issues has commenced through the review of the Remission Policy.

Recommendation	Response/Acceptance Level
17. That TPS ensures that the timeframes within the <i>Remission Policy</i> are complied with, to allow prisoners sufficient time to appeal full or partial loss of remission thereby ensuring procedural fairness for prisoners	Supported - Existing Initiative As per the response to Recommendation 16 above.
18. That TPS considers options for providing prisoners with a general induction to the prison and its services by way of an audio/visual format to assist prisoners with low levels of literacy.	Supported in Principle The feasibility of using an iPad to facilitate the induction process will be explored.
19. That TPS considers an alternate design layout in the entrance at LRP to make the area more functional and ensure optimal barrier protection	Supported in Principle A review of the area will be conducted in order to identify suitable options.
20. That TPS considers options and implements a solution to preserve prisoners' privacy and dignity when using the toilets in the two observation cells at LRP	Supported Privacy screens are to be designed and installed.
21. That TPS provides chairs for the desks in the LRP cells	Supported - Existing Initiative New desks are to be manufactured and installed and suitable chairs are to be sourced and placed in every cell.
22. That TPS installs privacy measures for the LRP day yard telephone	Supported - Existing Initiative Design and construction options will be considered in order to provide privacy for telephone calls.
23. That TPS remodels beds in LRP cells to allow circulation of air around mattresses	Supported - Existing Initiative A design has been developed in order to address this issue in every cell within the TPS. This will continue be rolled out to all prisons, including the LRP.
24. That TPS installs privacy measures around the area used for strip-searching male prisoners at LRP	Supported Privacy screening is to be designed and installed in order to create two search cubicles in the LRP.

Recommendation	Response/Acceptance Level
25. That TPS considers options, and implement solutions, to ensure a safe and secure reception and administration area, and an improved area to facilitate adequate searching at HRP	Supported - Existing Initiative One cell at HRP has been identified to be converted into a Reception room.
26. That TPS reviews the training of TRG officers and implements changes to provide them with the ability to extract persons from razor wire, both at ground level and at height, safely. TRG members should also be provided with ongoing refresher training in this area	Supported This will be considered as part of a Use of Force review.
27. That TPS considers the inclusion of a specialised young offenders accommodation unit when planning future infrastructure projects	Supported in Principle Analysis of the breakdown of prisoner cohorts in preparation for the opening of the Southern Remand Centre and beyond includes how to better accommodate 18 to 25 year old prisoners.
28. That TPS introduces a separate dosing area for the pharmacotherapy program to improve access for prisoners to medical services provided by Correctional Primary Health Services in the clinic area	Supported - Existing Initiative Work is already underway to address this within RPC as part of the Southern Remand Centre build. Discussions are also progressing on the introduction of a separate dosing area within RBMSP.
29. That TPS installs screening on the Crisis Support Unit exercise yards to ensure prisoner privacy	Supported in Principle Designs and costs are to be sought.
30. That TPS considers design changes to the Crisis Support Unit to provide a softer environment and improvements to line of sight	Supported in Principle An independent review of the operation of the CSU is planned for 2019/20. Consideration is currently being given to a suitable party to undertake the review.
31. That TPS reviews the operating procedures for the Crisis Support Unit to ensure a good level of amenity and activity, and high levels of social interaction for prisoners	Supported in Principle These matters will also be considered as part of the independent review of the operation of the CSU planned for 2019/20.

Recommendation	Response/Acceptance Level
32. That TPS makes available independent or self-care living accommodation for appropriately security-classified male and female prisoners	Supported in Principle  This is already in place. 16 existing O'Hara beds for men will be expanded to 32 by January 2020. 25 Vanessa Goodwin Cottage beds are currently available for pregnant women and those with babies, and this accommodation provides a level of independence from the MHWP. A review of the operating model of these units will be conducted in order to ensure an appropriate core day structure is provided.
33. That TPS displays the State Service Code of Conduct in the Visitor Reception Centre, the visits area of all prisons and on the TPS website	Supported  Signage will be reviewed in order to ensure appropriate staff expectations are displayed. Signage is to be designed, sourced and installed.
34. That TPS introduces codes of conduct for prisoners and visitors to the prison	Supported  These are being developed in conjunction with all key stakeholders and will be displayed as per the response to Recommendation 33 above.
35. That TPS ensures that prison rules are prominently displayed in appropriate areas of all prisons	Supported  Signage is to be designed, sourced and installed in order to meet this requirement.
36. That TPS updates the procedural documents relating to anti-bullying as a priority	Supported - Existing Initiative  Our Safer Prisons Senior Officer has developed a draft policy that the TPS Senior Management Team is scheduled to review at their September 2019 meeting. DoJ also has Departmental policies that all employees are expected to observe.
37. That TPS implements anti-bullying strategies in all custodial centres, covering both staff and prisoners, tailored to the specific prison environment	Supported - Existing Initiative  As per the response to Recommendation 36 above, with respect to staff.

Recommendation	Response/Acceptance Level
38. That TPS ensures that statistics of all bullying incidents are collected and maintained	Supported - Existing Initiative This will be incorporated into the draft policy (as per the response to Recommendation 36 above). Records of staff complaints are already maintained.
39. That TPS ensures all unlock and lockup times for prisoners are accurately recorded by correctional staff each morning and afternoon to ensure true records are maintained for statistical and reporting purposes	Supported - Existing Initiative The ongoing development and implementation of our Compliance Framework will improve consistency in this area.
40. That TPS ensures, for maximum-security units, case notes to record individual prisoners' time out of cell – whether alone or in a walk group - accurately reflect the start time and total time to ensure true records are maintained	Supported The review and re launch of the Case Management system will ensure that all prisoners have an assigned case worker who will engage effectively with all prisoners on their caseload and will record appropriate details, including time out of cells, in case notes.
41. That TPS amends its procedures to ensure that counts are conducted by at least two correctional officers and photographic identification is referred to during the count process	Supported A review of muster procedures will be undertaken to ensure a consistent and appropriate process is in place. The new procedures will include consistent use of photo identification and the completion of musters by two staff.
42. That TPS implements a security-testing program, ensuring that records of the security tests are kept and the results made available to relevant staff	Supported - Existing Initiative The development of a series of covert security tests is underway in order to appropriately test our ability to maintain a safe and secure environment.
43. That TPS implements additional presumptive drug testing of prisoners	Supported - Existing Initiative Implemented - since 1/7/19 the TPS increased random drug testing to 10% of the prisoner population.

Recommendation	Response/Acceptance Level
<p>44. That TPS researches and implements various scanning technology that will detect not only metal but also drugs and other items. This technology should be introduced into areas of the prisons where it best helps detect and reduce the supply of illicit drugs and other contraband</p>	<p>Supported in Principle</p> <p>A number of technological solutions are being explored as part of our redevelopment work and new builds across the TPS.</p>
<p>45. That TPS introduces x-ray scanning technology that can support x-raying of items entering the commercial laundry</p>	<p>Not Supported</p> <p>The use of x-ray scanning technology is not supported, but the TPS has employed three staff whose dedicated role is the searching and separation of laundry items prior to any access by prisoners. This initiative has proven to be a great success in the reduction of contraband entering the TPS.</p>
<p>46. That TPS updates all operating manuals/models and Standard Operating Procedures relating to vehicle searches to ensure that they cover the searching requirements set out in the Director's Standing Order relating to Searches</p>	<p>Supported</p> <p>This is an ongoing project. We have recently reviewed the way in which vehicle searches have been undertaken, and a new model of operation is currently under development. It is anticipated that implementation of this model will commence from 1/1/20.</p>
<p>47. That TPS ensures that all procedures in the searching process are followed for all vehicle searches, particularly searching underneath vehicles using a wheeled mirror or scanning equipment</p>	<p>Supported</p> <p>An internal audit of searching procedures is scheduled for 2019 and these matters will be addressed as part of the audit.</p>
<p>48. That TPS implements a process for actively monitoring search procedures</p>	<p>Supported</p> <p>This recommendation will be supported by the new Compliance Framework that is anticipated to be rolled out over the next 12 months.</p>

Recommendation	Response/Acceptance Level
49. That TPS implements staff training to ensure that all other options for managing non-compliant prisoner behaviour are fully explored before separate confinement is considered	Supported - Existing Initiative Completed – this Recommendation has been addressed as part of recruitment and ongoing Use of Force training which includes de-escalation techniques for managing non-compliant prisoner behaviour (such as verbal judo).
50. That TPS implements a process to ensure that prisoners are notified in writing of the reason for administrative segregation and advised of their rights to a review of the decision to segregate	Supported - Existing Initiative Completed – the separation orders now include a 'Part B' which is issued to the prisoner upon their separation.
51. That TPS ensures that prisoners in the transitional units in RPC are visited daily by a member of the prison management team	Supported The Superintendent RPC Maximum will take lead responsibility for ensuring that this practice occurs daily. Other RPC Superintendents will undertake this function in the absence of the Superintendent RPC.
52. That TPS fences off the protective units from mainstream prisoners in the medium-security precinct.	Supported in Principle Consideration of this issue is ongoing in the broader context of the management and placement of different prisoner cohorts within the existing infrastructure and planned new infrastructure. The development of the new Southern Remand Centre presents a number of new options to isolate particular cohorts such as protective units.
53. That TPS considers options to include a purpose built secure area for the protection of prisoners in the design of any future prison infrastructure	Supported in Principle As per the response to Recommendation 52 above.

Recommendation	Response/Acceptance Level
54. That TPS implements a formal process for protective custody which includes a requirement for protective custody directions to be in writing and to advise the prisoner of the reason for protection and their right to seek a review of the decision	Supported - Existing Initiative  This matter will form part of the Safer Prisons Strategy which is currently in draft form and due for SMT endorsement and implementation in September 2019.
55. That TPS explores options to provide a safer environment for transgender prisoners and ensure better protection of transgender rights	Supported - Existing Initiative  As per the response to Recommendation 54 above. The relevant DSO (2.15) was implemented from 4 August 2017 and amended in May 2018.
56. That TPS ensures staff working in special high security units receive specialist training, including regular refresher training, and are rotated into other duties at appropriate intervals	Supported - Existing Initiative  The recent review of the Maximum Security units identified a number of new initiatives including the development and implementation of a new selection and training strategy for staff working in the prison's high security units. Implementation of this strategy is scheduled to begin in August 2019.
57. That TPS implements a procedural document outlining appropriate information including the purpose, role, function, placement and exit criteria for special high security units and the appeals process for decisions to accommodate prisoners in such units	Supported - Existing Initiative  This item forms part of the review and subsequent actions outlined in response to Recommendation 56 above.
58. That TPS issues an operating model for the Tamar Unit as a priority	Supported - Existing Initiative  This item forms part of the review and subsequent actions outlined in response to Recommendation 56 above.
59. That TPS reviews and actions recommendations 1, 3, 4 and 5 contained in the Ombudsman's 2010 report, Risdon Prison Complex Tamar Unit and Behaviour Management Program	Supported  This item forms part of the review and subsequent actions outlined in response to Recommendation 56 above.

Recommendation	Response/Acceptance Level
60. That TPS considers options to minimise the period of time that prisoners spend in cell whilst in administrative segregation in the Tamar Unit	Supported The new operating models for all management units will include detailed core days schedules setting out access to services for all prisoners held in these units.
61. That TPS provides prisoners in the Tamar Unit with more opportunities for work and other constructive activities such as education and recreation	Supported As per the response to Recommendation 60 above.
62. That TPS updates the operating model for the Huon Unit, including clarifying the primary purpose of the Unit	Supported As per the response to Recommendations 56 to 61 above.
63. That TPS reviews the contract system that is in place in Huon, particularly relating to protective custody prisoners	Supported As per the response to Recommendations 56 to 62 above.
64. That TPS as a priority, ensures prisoners in the Huon Unit are appropriately case managed and provided with constructive activities such as further opportunities for work, education and recreation	Supported As per the response to Recommendations 56 to 63 above.
65. That TPS provides information on the complaints and grievances process by way of an induction video or similar audio/visual format	Supported - Existing Initiative A new complaints and grievances process is under development. The provision of information about the process to prisoners will be explored as the new model is developed.
66. That TPS reviews the existing complaints policy and introduces measures to ensure the complaints and grievances processes maintain prisoner confidentiality	Supported - Existing Initiative The new complaints model includes a 'confidential access' process.

Recommendation	Response/Acceptance Level
67. That TPS considers options to allow prisoners to lodge a complaint about the conduct of correctional officers outside of the existing unit management framework	Supported - Existing Initiative As per the response to Recommendation 66 above.
68. That TPS explores options, and implements measures, to ensure all prisoners have access to a regularly updated library of law resources	Supported Discussions with a view to providing this service have commenced with Libraries Tasmania as part of the renewal of the Memorandum Of Understanding between the two agencies.
69. That TPS introduces a checklist to ensure all steps of the disciplinary process for prison offences have been completed	Supported - Existing Initiative A review of internal disciplinary processes has recently been completed. This matter will be addressed as the outcomes of the review are implemented.
70. That TPS implements a quality assurance process to ensure the disciplinary process for prison offences is adhered to	Supported - Existing Initiative As per the response to Recommendation 69 above. The new Compliance Framework will establish appropriate assurance measures for disciplinary procedures.
71. That TPS implements training for correctional officers in the disciplinary process on a regular basis to improve transparency, consistency and procedural fairness in decision making.	Supported - Existing Initiative As per the response to Recommendations 69 and 70, a training package for all Managers who undertake disciplinary procedures will be implemented. Managers will not be authorised to undertake disciplinary hearings until they have completed this training.
72. That TPS includes a Reasons for Decision section on all disciplinary process forms	Supported - Existing Initiative As per the response to Recommendations 69 to 71 above.

Recommendation	Response/Acceptance Level
73. That TPS reviews the use of force register on a regular basis to ensure greater accuracy in reporting	Supported - Existing Initiative Use of force is routinely reviewed by the Superintendent of each facility. Additionally, the TPS has introduced a further review to be undertaken by the Performance and Compliance team.
74. That TPS establishes the TRG as a standalone group with its own supporting internal structures, or that the pool of TRG members is increased	Not Supported This is not regarded as appropriate use of the TRG, which is trained to manage high level significant incidents. However, the introduction of the Dedicated Response Team (DRT) in September 2019 will address this Recommendation.
75. That TPS reviews the refresher training provided to correctional officers generally and takes immediate steps to ensure all Superintendents and Supervisors have completed current refresher training	Supported - Existing Initiative The implementation of the new rosters allows for greater and more frequent training of all staff. A specific training package for Supervisors and Superintendents is under development and will be introduced later this year.
76. That TPS ensures only correctional officers that are up to date with chemical agent training are permitted to draw, carry and use chemical agents	Supported - Existing Initiative This is current practice.
77. That TPS introduces a checklist or set criteria to assist correctional officers in determining whether force used was reasonable and appropriate in the circumstances	Supported - Existing Initiative This is part of the review of all Use of Force and will be enhanced by the introduction of the Performance and Compliance reviews.
78. That TPS implements a process to ensure that correctional officers check prisoner records before planned use of chemical agents or electric shock devices	Supported in Principle This is only possible if the use of force is planned. The Use of Force review and amendments to our training package will accommodate this Recommendation.

Recommendation	Response/Acceptance Level
79. That TPS implements a process for notification of a prisoner's registered primary contact when an injury has been sustained during use of force and health attention is provided to the prisoner	<p>Not Supported</p> <p>The TPS contacts relevant parties on a case by case basis in all cases of serious injury. However, it does not believe it is appropriate or standard practice in other jurisdictions with respect to minor injuries.</p>
80. That TPS ensures that a medical examination occurs immediately (or as soon as is practically possible) after the use of chemical agent	<p>Supported - Existing Initiative</p> <p>This is current practice and will be further considered as part of our Use of Force training review.</p>
81. That TPS reviews the training provided to non-uniform staff and Correctional Primary Health Services staff in relation to emergency codes	<p>Supported - Existing Initiative</p> <p>The current review of Emergency Management Plans will address this recommendation.</p>
82. That TPS ensures that emergency codes and announcements are broadcast over all radios and, where appropriate, through the public announcement system	<p>Not Supported</p> <p>The TPS maintains that security reasons dictate that it is not always appropriate to announce the occurrence or nature of an incident.</p>
83. That TPS considers installing a gate at MHWP at the bottom of the stairs from the processing area through to the administration area	<p>Supported in Principle</p> <p>TPS will explore appropriate and achievable options to address this recommendation.</p>
84. That TPS reassesses the need to strip search at the end of a journey if a prisoner was strip searched immediately prior to being transported	<p>Supported - Existing Initiative</p> <p>The TPS's Directors Standing Order (DSO) in relation to searches (8.3.7) has been amended to reflect the circumstances and conditions for personal searches of juveniles, and the entire DSO is currently under review.</p>

Recommendation	Response/Acceptance Level
85. That TPS considers better storage options on escort vans for prisoner property when procuring the next fleet of vehicles	Supported in Principle The recommendation will be noted when new vehicles are procured. The current plans to create a central property store for prisoners will assist to address this Recommendation.
86. That TPS reviews the training provided to correctional staff in relation to the transport of prisoners to ensure it is adequate, specific and detailed and ensure that periodic refresher training is routinely scheduled	Supported - Existing Initiative As noted in response to previous Recommendations, the new rosters allow for far greater access to training and will facilitate improvement in the delivery of refresher training to all staff.
87. That TPS explores options for ensuring that prisoners are able to access toilet facilities whilst travelling between Hobart and Launceston.	Supported in Principle TPS will initiate discussions with Tasmania Police to consider options to address this recommendation.
88. That TPS updates as a matter of urgency the Director's Standing Order relating to external escorts to include all information contained in staff internal memoranda issued between 2015 and the present time	Supported - Existing Initiative All DSOs are to be reformatted and updated over the next 12 months.
89. That TPS reviews the format and content of registers used for recording information relevant to prisoner transportation	Supported - Existing Initiative This review is currently underway as part of our internal audit process.
90. That TPS implements a policy and procedure for use of force in transportation of prisoners	Supported - Existing Initiative This Recommendation will be addressed as part of the Use of Force review.