



Lilian Kordic
Edmonton Institution for Women
11151 178 St NW Unit 1, Edmonton, AB T5S 2H9
Sent via email.

March 10th, 2025

Dear Lil,

I want to thank the institutional management team (“IMT”) at the Edmonton Institution for Women (EIFW) for taking the time to meet with me on February 13th, 2025, in person at EIFW.

This letter summarizes reports received and conditions observed during our visit to the Edmonton Institution for Women from February 11th through 13th as well as summaries of the discussion between the Canadian Association of Elizabeth Fry Societies (CAEFS) and members of IMT following the visit, the relevant laws and policies, and CAEFS’ recommendations.

We look forward to your response.

Respectfully,

A handwritten signature in black ink that reads 'J. Omstead'.

Jacqueline Omstead
Senior Advocate

Structured Intervention Unit (SIU) Placement

Description: CAEFS met with an Indigenous woman incarcerated in the Structured Intervention Unit (SIU). She reported not being informed of the reasons for her placement for two days following SIU placement. The documents cited her placement due to “intimidating and disrespectful behavior to officers and CM; delaying count, inciting others to act negatively.” However, she stated that her case management team had not previously raised concerns with her behavior, nor had she received any recent charges. She also reported feeling antagonized by staff before her placement. She shared that she can sometimes feel triggered by with authority figures, citing her experiences as an Indigenous person. Her placement paperwork indicated no connection with mental health services. Additionally, she shared that, until recently, she had been working full-time, attending school, and classified as a “Level 3.” She also shared that she was hesitant to submit to the 5-day review in writing for fear of her words being misinterpreted but was open to verbal submissions.

Discussion: The IMT reported that the individual in the SIU had refused to engage with her Case Management Team (CMT) prior to placement, and that it was she who antagonized and threatened staff and the Warden. The IMT suggested that drugs may have contributed to her behavior, though acknowledged there was no specific evidence. The IMT confirmed a referral to mental health services had since been made.

Law & Policy¹:

CCRA 79.1 (1) In making decisions under this Act affecting an Indigenous [people in prison], the Service shall take the following into consideration:

- (a) systemic and background factors affecting Indigenous peoples of Canada;
- (b) systemic and background factors that have contributed to the overrepresentation of Indigenous persons in the criminal justice system and that may have contributed to the [person’s] involvement in the criminal justice system;

CD 001, s.2: The CSC Values Statement guides behaviour, decision making and discretionary judgement in the Service. CSC staff are expected to demonstrate the following shared, reciprocal values in all of their interactions with offenders [...] Professionalism: Professionalism is a commitment to abide by high ethical standards of behaviour as well as relevant group standards, and to develop and apply specialized knowledge for the public good. Professionalism is anchored in a commitment to integrity – a commitment to uphold our values in even the most difficult circumstances.

CAEFS’ Recommendations: CAEFS encourages CSC to broaden its application of Creating Choices philosophies of empowerment, support, and person-centered care in its administration of the material conditions of incarceration. As such, CAEFS calls for the closure of the Structured Intervention Units.

Security Level Reviews and Access to Least Restrictive Conditions

Description: CAEFS received reports that there are a significant amount of available beds in the minimum-security unit (MSU). CAEFS also that some individuals whose security classification scores indicated minimum security, but were

¹ See also: *National Inquiry into Missing and Murdered Indigenous Women and Girls*, Calls for Justice, 5.22: We call upon the federal government to return women’s corrections to the key principles set out in *Creating Choices* (1990).

National Inquiry into Missing and Murdered Indigenous Women and Girls, Calls for Justice, 14.8: We call upon Correctional Service Canada to ensure its correctional facilities and programs recognize the distinct needs of Indigenous offenders when designing and implementing programming for First Nations, Inuit, and Métis women. Correctional Service Canada must use culturally safe, distinctions-based, and trauma-informed models of care, adapted to the needs of Indigenous women, girls, and 2SLGBTQIA people.



overridden to keep them at medium security. Many expressed frustrations, feeling they had met all requirements to cascade down, but were still deemed ineligible.

Discussion: The IMT stated that they frequently canvass individuals to transfer to the MSU, but many decline, finding it more restrictive than the main compound. They disagreed with reports of security classification overrides, emphasizing that the assessment tool provides only a recommendation. They noted that strictly following scores would result in individuals with life sentences remaining at maximum security indefinitely. CAEFS and the IMT also discussed addiction treatment and programming options, with the IMT confirming that SMART Recovery is available both in the main compound and the MSU.

Law & Policy:

CCRA s.3: The purpose of the correctional system is to contribute to a just, peaceful, and safe society by carrying out sentences imposed by courts through the safe and human custody and supervision of incarcerated people and by assisting the rehabilitation of incarcerated people and their reintegration into community as law-abiding citizens.

CCRA s.4(f): correctional decisions are made in a forthright and fair manner, with access by the [incarcerated person] to an effective grievance procedure.

CCRA s. 28: If a person is or is to be confined in a penitentiary, the Service shall take all reasonable steps to ensure that the penitentiary in which they are confined is one that provides them with the least restrictive environment for that person [...].

CAEFS' Recommendation: CAEFS recommends that in instances where the Institutional Head's opinion is not aligned with the custody rating scale and / or with the assessment of the case management team, that the person be given, in writing, a clear rationale based on the criteria outlined in section 28 of the CCRA, along with time-framed steps to take to address any perceived risks identified by the Institutional Head, which is aligned with the overarching purpose of CSC. Hesitancy to transfer to minimum-security units is well documented across penitentiaries designated for women. CSC should take steps to address the material conditions that deter people from readily transferring to these units when they are eligible to align with CSC's overall purpose.

Access to Health Care

Description: CAEFS received a number of reports related to health care during this visit. These included:

Accusation of Diversion: An individual reported being accused of diverting medication without evidence. Despite complying with two "flip your lip" checks, no medication was found. She was informed that she could still be removed from her medication, which she had been on for over seven years, pending a decision from Pharmacy. She denied any attempt to divert her medication.

Suboxone Program: People in the maximum-security unit reported concerns regarding the recent shift from pill to strip administration. Individuals reported that the strips feel more potent, making them feel "too high" and less productive. Some have reported opting out of daily participation to mitigate these effects but were subsequently removed from the program, leading to withdrawal symptoms such as sleep disturbances, restlessness, and body temperature fluctuations. Many expressed concern that healthcare staff did not follow up on their well-being after their removal from the program. Additionally, individuals reported feeling unheard and dismissed when raising concerns with program nurses.

Referrals for Top Surgery and Breast Reduction: Two individuals reported barriers to accessing medically necessary surgeries. One was denied a breast reduction by a local clinic due to incarceration and was informed by health services staff that she could not access surgery until her warrant expiry date. She reports also experiencing barriers in accessing a physiotherapist while awaiting surgery. Another individual, awaiting a gender-affirming mastectomy, was scheduled for surgery before being transferred to EIFW. He has now been waiting an additional two years for the procedure.



Discussion: The IMT was unaware of the diversion accusation and did not believe the incident had been reported or that it would lead to the individual's removal from their medication.

Healthcare stated that the suboxone strips are not more potent than the pills and that nurses had provided information on the change before implementation. They offered to share this information again and to confirm whether individuals are being followed up with after program removal. The IMT clarified that the switch from pills to strips was a regional decision.

Regarding surgical referrals, the IMT noted that National has requested a list of individuals awaiting gender-affirming surgeries and that this list will be monitored by Regional. When asked, they explained that the list was compiled for reasons related to cost and the human rights of gender-diverse individuals. Healthcare also shared that a physiotherapist is contracted for four hours a week to serve the EIFW population.

Law & Policy:

CCRA s.86 (1): The Service shall provide every [incarcerated person] with (a) essential health care; and (b) reasonable access to non-essential health care.

CCRA s.4(g): correctional policies, programs and practices respect gender, ethnic, cultural, religious and linguistic differences, sexual orientation and gender identity and expression, and are responsive to the special needs of women, Indigenous persons, visible minorities, persons requiring mental health care and other groups.

Truth and Reconciliation Commission, Calls to Action, 36: We call upon the federal, provincial, and territorial governments to work with Aboriginal communities to provide culturally relevant services to [incarcerated people] on issues such as substance abuse [...].

National Inquiry into Missing and Murdered Indigenous Women and Girls, Calls for Justice, 14.6: We call upon Correctional Service Canada and provincial and territorial services to provide intensive and comprehensive mental health, addictions, and trauma services for incarcerated Indigenous women, girls, and 2SLGBTQQIA people, ensuring that the term of care is needs-based and not tied to the duration of incarceration. These plans and services must follow the individuals as they reintegrate into the community.

CAEFS Recommendations: Considering CSC's unique responsibility to provide safe and humane custody to people in federal penitentiaries, and where those same people are reliant on penitentiary staff and contractors to provide health services, referrals, emergency care, timeframes etc., it is incumbent on CSC to center the dignity and care of these individuals. CAEFS encourages EIFW to prioritize clear communications to incarcerated people regarding decisions about their health care, and to implement culturally relevant services related to substance use and addiction.

Understanding of / Access to Law and Policy

Description: CAEFS noted a lack of awareness regarding the legal and policy framework governing the Correctional Service of Canada and the Parole Board of Canada. Many individuals that CAEFS met with reported being unfamiliar with the Corrections and Conditional Release Act and only recognized the Commissioner's Directives (CDs) by the acronym.

Discussion: CAEFS expressed concern that, due to this lack of awareness, individuals in the maximum-security unit may not be able to effectively request relevant legal or policy sections from staff, which is the current process at EIFW for accessing law and policy within the unit.

The IMT noted that CAEFS had conducted an advocacy training in the summer and expressed surprise that individuals remained unaware of the relevant legal and policy frameworks. They also raised that CAEFS had not delivered training in the maximum-security unit. The IMT stated that, in their view, the current process in the maximum-security unit is functioning effectively.



Law & Policy:

CCRR s.97(3): The Service shall ensure that an inmate has reasonable access to (a) legal counsel and legal reading materials; (b) non-legal materials, including (i) Commissioner's Directives, and (ii) regional instructions and institutional standing orders, except those relating to security matters [...]

CD 705-4 s.4: Staff responsible for orientation in all institutions, except CCCs, will also ensure that the process includes information on (17) Corrections and Conditional Release Act.

CD 001, s.2: The CSC Values Statement guides behaviour, decision making and discretionary judgement in the Service. CSC staff are expected to demonstrate the following shared, reciprocal values in all of their interactions with offenders [...] Accountability: Accountability involves the notion of being willing and able to explain, answer to and justify the appropriateness of actions and decisions. Accountability is applicable to everyone within CSC. Accountability is also about accepting and ensuring responsibility – providing necessary support, feedback, and oversight.

CAEFS Recommendations: CAEFS is committed to fostering a climate of legal literacy within penitentiaries, and we hope that EIFW will work alongside us to ensure that access to relevant laws and policies is supported, free from barriers. Access to legal and non-legal materials is an essential part of facilitating access to a fair and effective grievance system, and is aligned with legislation and CSC's values statement.

Changes to Phone Hours and Access to Family

Description: CAEFS received reports that access to the phone lines on the main compound have been reduced and that phone calls are no longer permitted between 10:00pm and 7:00am. People expressed concern at this new restriction and the impacts that it would have on access to family.

Discussion: The IMT shared that the change was implemented to better align phone usage with institutional routines and prevent inappropriate use. They stated that individuals requiring one-time access to contact family between 10:00 PM and 7:00 AM can ask staff during rounds. For ongoing access, individuals should submit a request to their institutional parole officer, with approvals granted on a case-by-case basis based on demonstrated need.

Law & Policy:

CCRA s.71(1): In order to promote relationships between [incarcerated people] and the community, an [incarcerated person] is entitled to have reasonable contact, including visits and correspondence, with family, friends and other persons from outside the penitentiary, subject to such reasonable limits as are prescribed for protecting the security of the penitentiary or the safety of persons.

CCRA s.4(c): the Service uses the least restrictive measures consistent with the protection of society, staff members and [people in prison].

CD 085 s.15: Access to telephones, through an inmate telephone system, should be provided, on a fair and consistent basis, to help maintain family and community ties and to provide a direct link with families in the event of an emergency.

CAEFS' Recommendation: A primary reason that Canadian penitentiaries designated from women were built in each region was to promote close community and familial contact for federally sentenced women and gender-diverse people. CAEFS strongly recommends that this overly restrictive limitation of people from access to a telephone be rescinded



immediately. All CSC decisions should be made in the spirit of facilitating the most broad and accessible access to community and family as possible.

Living Conditions: Double Bunking

Description: CAEFS received reports that individuals feel the cells on the main compound are not designed for two occupants, citing not only limited physical space but also inadequate shelving and a single TV port per room.

Discussion: The IMT stated that funding two TV ports per room was unlikely, as the cost would need to be covered by the Inmate Committee's budget. CAEFS and the IMT also discussed the affordability challenges of cable services amid evolving technologies.

Law & Policy:

CD 341, Policy Objective: To ensure that the reception and distribution of television signals within institutions are provided in a cost-effective manner and in accordance with applicable federal regulations.

CAEFS' Recommendations: CAEFS encourages EIFW and the CSC broadly to address and be responsive to impacts produced by physical conditions of confinement, including by working to fulfil their purpose to successfully reintegrate people back into community to avoid overcrowding within the penitentiary. The Commissioner's Directives on the reception and distribution of television signals was last updated in 1999. Given the developments in the technology, particularly the move away from cable and satellite television towards streaming platforms should be addressed to ensure affordability and value for money.

Bead Orders

Description: CAEFS received reports that there had been recent changes to what beads were available for people to order, and that these changes were unexpected and happened after people had placed their orders.

Discussion: The IMT stated that the approved list has remained unchanged for several years and suggested that the issue may stem from discrepancies between the Halford's catalog and the approved items list. They reaffirmed their support for bead ordering from Halford's, recognizing its cultural significance to Indigenous people, but noted that the process places a significant demand on staff resources.

Law & Policy:

CCRA s.4(c): the Service uses the least restrictive measures consistent with the protection of society, staff members and [people in prison].

CCRA s.4(g): correctional policies, programs and practices respect gender, ethnic, cultural, religious and linguistic differences, sexual orientation and gender identity and expression, and are responsive to the special needs of women, Indigenous persons, visible minorities, persons requiring mental health care and other groups.

CAEFS' Recommendations: CAEFS appreciates EIFW's recognition of the cultural importance of beading for many people incarcerated at EIFW. CAEFS encourages EIFW to more clearly communicate the restrictions regarding what can be ordered from the Halford's catalogue, and to remove these restrictions wherever feasible to allow for more creative expression.

