



Grand Valley Institution for Women
1575 Homer Watson Blvd Kitchener, ON N2P 2C5
Sent via email.

April 15th, 2025

CAEFS' March 2025 Advocacy Letter

Dear Angela,

We want to thank members of the institutional management team ("IMT") at GVI for taking the time to meet with our advocacy team on April 7th via Teams.

This letter summarizes reports we received and conditions we observed during our visit to the Grand Valley Institution from March 25th to 27th as well as summaries of the discussion between the Canadian Association of Elizabeth Fry Societies (CAEFS) and members of the institutional management team following the visit, the relevant laws and policies, and CAEFS' recommendations.

We look forward to your response.

Respectfully,

Jacqueline Omstead
Senior Advocate

Lockdowns

Description: While CAEFS was at GVI on the evening of March 26th, the institution went into lockdown. When CAEFS returned the following afternoon, the institution was again in lockdown, though CAEFS was permitted to access to maximum-security unit. Following our visit, CAEFS received calls to our advocacy phone line from individuals who were concerned that the institution remained in lockdown for 5 days, impacting their access to family, school, work, and programs.

Discussion: The IMT clarified that GVI was on a lockdown on Thursday, Friday, and part of Saturday to perform at section 53 search. There were also other periodic and unrelated lockdowns preceding the search.

Law & Policy:

CCRA s. 3: The purpose of the federal correctional system is to contribute to the maintenance of a just, peaceful and safe society by (a) carrying out sentences imposed by courts through the safe and humane custody and supervision of [federally sentenced people]; and (b) assisting the rehabilitation of [federally sentenced people] and their reintegration into the community as law-abiding citizens through the provision of programs in penitentiaries and in the community.

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

CAEFS Recommendations: Lockdowns produce significant trauma and result in long-term adverse impacts to individuals subjected to them. CAEFS encourages CSC to develop alternative measures to respond to issues of institutional safety that supports both other their legislated purposes.

Structured Intervention Units

Description: During CAEFS' visit, two Black transmasculine individuals were transferred to the Structured Intervention Unit (SIU). CAEFS met with one of them in a program room within the maximum-security unit. They reported repeatedly seeking staff support regarding what they described as a "high-risk" situation in his living unit, but no action was taken. When CAEFS requested to meet with the second individual, staff stated that the program room was already booked and that both the interview room and the SIU's recreational room were "not operational." Advocates also asked to meet outside or speak through the individual's cell door but were told this was not feasible due to staffing constraints. CAEFS was unable to meet with him.

Discussion: The IMT stated that the individual CAEFS met was placed based on SIO information and to facilitate an investigation. They also noted that the interview and recreation rooms attached to the SIU are unavailable due to a Section 127 Labour Code complaint.

Law & Policy:

CCRA s. 70: The Service shall take all reasonable steps to ensure that penitentiaries, the penitentiary environment, the living and working conditions of [incarcerated people] and the working conditions of staff members are safe, healthful and free of practices that undermine a person's sense of personal dignity.

CCRA s. 32 (1): The purpose of a structured intervention unit is to (b) provide the [incarcerated person] with an opportunity for meaningful human contact and an opportunity to participate in programs and to have access to services that respond to [their] specific needs and the risks posed by the [incarcerated person].

CCRA s. 32 (2): For the purposes of paragraph (1)(b), every reasonable effort shall be made to ensure that the opportunity to interact through human contact is not mediated or interposed by physical barriers such as bars, security glass, door hatches or screens.



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. While GVI responds to the labour complaint from staff, they must also continue to fulfill their obligations to provide opportunities for meaningful human contact to people incarcerated in the SIU.

Access to Food and Nutrition

Description: CAEFS received reports that living units on the main compound were given between \$144 and \$400 in credit on the day that groceries were delivered – meaning that GVI was unable to fulfill a significant portion of each living unit's grocery order. For example, one person reported that she only received a can of tomatoes. People shared that they felt concerned and anxious that they would not have enough food to eat for the week. People also shared with CAEFS that not receiving what they ordered made it very challenging to meal plan and to budget appropriately, as sometimes the items available on credit are more expensive than the items originally ordered. This was particularly true for people with specific dietary needs such as vegetarians and people who only eat halal meat.

House Representatives also reported to CAEFS that there is no rotation for which living unit's groceries are filled first, but that the system operates on a "first come, first served" basis. This, combined with the lack of grocery supply, has led some House Representatives to feel that they must leave their living units ahead of movement and run to Food Services to try to be among the first living units to have their orders filled.

Discussion: When CAEFS was first made aware of the issue, an email was sent to the Warden, who responded and included relevant members of the Institutional Management Team (IMT). CAEFS reports and responses were discussed. The IMT stated there had been no impact on incarcerated individuals at GVI and attributed the concerns to several factors, including the fiscal year-end. They explained that while GVI typically maintains a two-week stock of supplies, they had been advised to reduce this inventory before year-end. Additional factors cited included supplier issues and tariffs. The IMT also confirmed, via the Chief of Food Services, that grocery orders are fulfilled on a rotating basis. CAEFS offered to follow up with house representatives to better understand the discrepancy between their experiences and the institution's stated practices, and the IMT committed to doing the same with Food Services.

Law & Policy:

CCRA s. 70 The Service shall take all reasonable steps to ensure that penitentiaries, the penitentiary environment, the living and working conditions of [incarcerated people] and the working conditions of staff members are safe, healthful and free of practices that undermine a person's sense of personal dignity.

CCRR s. 83 (2) The Service shall take all reasonable steps to ensure the safety of every [incarcerated person] and that every [incarcerated person] is (a) adequately clothed and fed;

GL 880-1, s. 8: The Food Services Manager will ensure that sufficient stocks of any special food items are available to meet the [incarcerated person's] dietary requirements.

CAEFS' Recommendations: Access to healthy, fresh food is essential to the health, well-being, and dignity of incarcerated individuals, and must guide GVI and CSC's food procurement decisions. While CAEFS acknowledges that tariffs are beyond CSC's control, prioritizing surplus stock disposal over adequate nutrition undermines CSC's legal obligations to those in its care.



Access to Family

Description: It was reported to CAEFS that it takes two to three months, on average, for a visitor's application to be processed. Applications must be sent via the mail, and it was reported that they often go missing, reportedly furthering delaying the process. As a result, people report that they are often waiting months to be able to see family members in person. People also reported it taking a similar amount of time for phone numbers to be approved and added to their PIN lists. Meaning, that people cannot even reliably contact family members by phone. Separately, people in living unit 7 reported that their phone is not functioning and that only some people are able to actually make phone calls.

Discussion: The IMT reported that they had not received complaints about delays in processing visitor applications but will follow up on the issue. They noted that GVI's review board is experiencing delays in reviewing cases involving suspended visits or individuals returned to custody. The IMT also offered to investigate why applications cannot be submitted by email. They confirmed that individuals in the community can return missed calls from the institution regarding PIN list vetting and leave a voicemail indicating a better time for a callback. Regarding concerns about the phone in Living Unit 7, the IMT stated they had already taken steps to resolve the issue, including resetting the voice recognition system, and believe it has been resolved.

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.

CD 085 s. 2: Institutional Standing Orders shall set out the following: (b) procedures for establishing or amending an [an incarcerated person's] authorized call list (Call Allow List) - normally this should be processed within 15 working days of the [incarcerated person's] written request

CAEFS Recommendations: 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. All CSC decisions should be made in the spirit of facilitating the most broad and accessible access to community and family as possible. As such, CAEFS recommends augmenting the process for processing visitor applications and confirming numbers on people's PIN lists to ensure timely access to family.

Emergency Transfer to Prison Designated for Men

Description: It was reported to CAEFS that a transwoman was transferred back to a prison designated for men on an emergency basis, after only having been at GVI for a few days and following a placement in the Structured Intervention Unit. In discussing this, another transwoman shared with CAEFS that there are limited supports, resources, and information available to transwomen who are transferring to a prison designated for women for the first time to support them in understanding the differences in institutional cultures, expectations, and norms.

Discussion: The IMT shared that the person who was transferred back to a prison designated for men was considered a "complex case" and that much preparation had been done prior to the transfer to GVI. While sharing that they are supportive of more resources in general, they did not believe that this would have made a difference in this instance. CAEFS has not connected directly with the individual who was transferred, and so specifics of the transfer were not able to be discussed.

Law & Policy:

CHRA s. 3 (1): For all purposes of this Act, the prohibited grounds of discrimination are race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, disability and conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered.



CD 100, s.7: The Regional Deputy Commissioner will: in collaboration with Institutional Heads and District Directors, and others as required, create opportunities to promote awareness among staff and [federally sentenced people] on the human rights and needs of gender diverse [people].

CD 100, s.8 (d): The Institutional Head/District Director will: ensure [incarcerated people] have access to external resources and networks that are respectful and reflective of gender diversity; (e) foster behaviours and practices among staff and [incarcerated people] that promote a safe and inclusive environment in institutions, including Community Correctional Centres; (f) foster an environment where 2SLGBTQI+ inclusive activities, services and interventions can take place and allow [incarcerated people] to form 2SLGBTQI+ associations or committees that will meet their needs and interests.

CAEFS Recommendations: CAEFS recommends that CSC collaborate with trans women with lived experience and relevant expertise, as well as peer-led 2SLGBTQI+ organizations, committees, and community groups, to develop resources that support the safe and successful integration of trans women transferring from prisons designated for men to prisons designated for women.

