



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

May 12th, 2025

CAEFS' April 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 24th via Teams.

This letter summarizes reports we received and conditions we observed during our visit to the Grand Valley Institution on April 9th and 23rd and provides 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



Access to Family

Description: CAEFS received reports that the visitor application forms available in the MSU are outdated (from 2023), and that individuals must submit a request to Visits and Correspondence (V&C) to receive updated versions. In some cases, people were told to ask their families to print the form at home. These barriers have reportedly caused delays in application processing and have hindered access to in-person visits. One individual shared that she has been at GVI for over six months without being able to visit with her children due to these delays. Additionally, CAEFS was informed that prospective visitors are not being notified upon approval, requiring incarcerated people to follow up themselves. Neither incarcerated people nor their visitors are reportedly being informed when visitor applications are expiring.

Discussion: The IMT committed to ensuring that visitor application forms are updated and accessible to individuals at all security levels. They clarified that application status updates are sent directly to prospective visitors, who are responsible for booking visits and notifying CSC of any address changes. While applications are typically sent by mail, alternative arrangements were made during the postal strike. Incarcerated people are not informed of the status of visitor applications. The IMT noted that CPIC checks expire every two years and that individuals are informed of expirations. Visitors may contact V&C to check on the status of their application, which is tracked internally.

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.

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. CAEFS encourages CSC to modernize its visitor application process to enable timely reviews and reduce the negative impacts of delays on incarcerated individuals and their loved ones.

Access to Food and Nutrition

Description: CAEFS received clarification from House Representatives regarding a concern previously raised with the IMT. While CAEFS had understood that groceries were distributed on a “first come, first served” basis, House Representatives clarified that groceries are, in fact, distributed on a rotating basis. However, this rotation does not apply to “credits”—the process by which individuals select substitute grocery items when their original orders are unavailable. Due to limited supply and the absence of a rotation system for credits, some House Representatives reported feeling compelled to leave their units early to reach Food Services first. They proposed that the living unit that received groceries last be prioritized for credits.

CAEFS continued to receive reports regarding the impact of the limited grocery supply in March. Individuals shared that they were forced to spend their credits on the few items available—such as multiple cans of pumpkin purée or \$50 worth of sardines—due to the lack of selection.

House Representatives also reported discrepancies between actual population counts and the figures used by Food Services, which affected weekly food budgets. For example, one unit with six residents was reportedly budgeted for only five.



Discussion: The IMT offered to follow up with Food Services regarding how credits are being filled and shared that they had noted the reported impacts. They stated that any discrepancies between the number of individuals in living units and Food Service records would be considered exceptional.

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;

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. CAEFS encourages GVI to adopt the process for filling credits proposed by the House Representatives.

Lockdown: Time Outdoors

Description: CAEFS continued to receive reports regarding conditions of confinement during the 3-day lockdown in March. People shared that people were only given 15 minutes of outdoor access over the course of the lockdown, and that this was limited to being on the porches of their living units, under direct supervision. Further, it was reported that some living units did not receive any outdoor time.

Discussion: The IMT was unable to confirm the specific schedule for outdoor access during the lockdown. They noted that the frequency of lockdowns at GVI has increased in response to structural issues at the site.

Law & Policy:

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

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 (d) given the opportunity to exercise for at least one hour every day outdoors, weather permitting, or indoors where the weather does not permit exercising outdoors.

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 support both of their legislated purposes.

Peer-Led Committees

Description: CAEFS was shown a memo from the Warden indicating that, due to increased stability within the Inmate Committee and perceived overlap in the issues raised by various subcommittees, meetings with subcommittees were deemed redundant. In response, subcommittee chairs expressed concern that their ability to represent the interests of their members was being diminished. They disagreed with the characterization of the issues as redundant and noted that they had recently received new meeting dates, making the timing of the memo unexpected. While subcommittee meetings were previously held quarterly, the memo did not clarify the new meeting frequency.



Separately, it was reported to CAEFS that substantive changes would be required for this year's PRIDE event. Additionally, the Inmate Committee representative for the maximum-security unit reported that she was not brought to the Inmate Committee meeting with management.

Discussion: The Warden was not present at the meeting to be able to respond to the memo directly. The IMT said that they were aware of the memo and the reasoning behind it. They also shared that this new process better aligned with what has been happening at the other federal prisons designated for women. The IMT shared that if committee members are noticing that their concerns are not being raised by the Inmate Committee, they can speak to the Social Programs Officer assigned to their committee. Regarding the PRIDE event, the IMT shared that nothing had been finalized but that their capacity for large events is limited and restricting the number of attendees at these events is one strategy that is being considered. The IMT reported that they had reached out to the Correctional Manager of the maximum-security unit to connect with the Inmate Committee representative, and that the response was that she had provided her agenda items to the Chair and did not want to attend. CAEFS emphasized that the representative had wanted to attend, but was reportedly prevented from doing so.

Law & Policy:

CCRA s. 74: The Service shall provide [incarcerated people] with the opportunity to contribute to decisions of the Service affecting the [incarcerated] population as a whole, or affecting a group within the [incarcerated] population, except decisions relating to security matters.

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: Peer-led committees are an essential element of the *Creating Choices* model of incarceration and are supported under the CCRA. These committees foster a culture of empowerment, democratic participation, and shared responsibility. CAEFS encourages the IMT to continue engaging with all peer-led committees to ensure that the diversity of voices of incarcerated individuals are meaningfully included in decisions that affect them. CAEFS also urges GVI to support and prioritize population-wide events—particularly those that promote inclusion and community—as an upstream approach to addressing lateral violence.

Access to Computers

Description: CAEFS received reports that the computer lab on the main compound has been inaccessible for over a month due to reported safety concerns. In the maximum-security unit, the lower programs room (where the computers are located) is also inaccessible, though the reasons have not been communicated to the population. The lack of computer access has reportedly hindered individuals' ability to pursue post-secondary education, access legal and policy materials, and work on grievances / complaints.

Discussion: The IMT reported that computer access on both the main compound and in the maximum-security unit has been restricted due to concerns about misuse of the space, including disrespect for the room, non-compliance with institutional rules, and the sharing of passwords. They stated that a strategy is being developed for increased supervision of the area, but the rooms have been closed in the interim.

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 (b) assisting the rehabilitation of [incarcerated people] and their reintegration into the community as law-abiding citizens through the provision of programs in penitentiaries and in the community.



CCRR s.97(3): The Service shall ensure that an [incarcerated person] 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 [...]

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: CAEFS encourages GVI to reinstate access to computers without delay. The lack of access limits incarcerated individuals' ability to pursue education, obtain legal information, and prepare for reintegration—key objectives of CSC. Any increased supervision measures should be proportionate, transparently communicated to the population, and consistent with CSC's purpose.

Physical Conditions of Confinement: Hygiene

Description: CAEFS received reports that the washing machine in Unit 5 has been out of service for two weeks, preventing individuals from washing their personal clothing. During this time, it was reported that only institutional clothing has been permitted to be laundered through Stores. CAEFS also received concerns about inadequate toilet paper distribution, particularly in the trailer, where individuals reported receiving only four rolls per week for 16 people. When the House Representative requested additional toilet paper from Stores, the request was reportedly denied.

Discussion: The IMT reported that the washing machine had been missing a panel, but that the part has since been replaced and the machine remained operational during that time. Regarding toilet paper distribution, the IMT stated that they would not increase the amount provided to living units, citing reports that some individuals may be hoarding toilet paper in their rooms.

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 [...] (c) provided with toilet articles and all other articles necessary for personal health and cleanliness

CAEFS Recommendations: People often hoard items when they are uncertain about future access. Ensuring that individuals at GVI have reliable and consistent access to essential hygiene items would help mitigate any reported hoarding and support GVI's obligation to maintain a dignified living environment.

Involuntary Transfers to Higher Security Classifications

Description: CAEFS met with four individuals who were recently involuntarily transferred to a higher security classification pending a security level review. Three were moved to the maximum-security unit following placement in the Structured Intervention Unit (SIU), while one was transferred from the minimum-security unit to the main compound. In all cases, individuals reported not being given the opportunity to work with their case management team to explore less restrictive alternatives prior to their interim placements. They expressed that any perceived risk could have been managed within a lower security environment. All also reported difficulties accessing SIO information—such as not receiving the A4D or related memos in time—which impacted their ability to prepare for review hearings. Most individuals requested legal referrals or asked



if CAEFS could attend their security review hearings. While CAEFS was not permitted to attend, written submissions were accepted ahead of the hearing. People also expressed concern that their lawyers might not be allowed to attend the hearings. Two of the individuals transferred to the maximum-security unit were Black, and the other was Indigenous.

Discussion: The IMT reported that individuals are provided with ample opportunities to engage with their case management teams during SIU and interim placements, and that efforts are made to explore alternatives. However, they noted this is only possible when the individual consents to meeting with their team. The IMT confirmed that people have the right to have a lawyer present at their review.

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 (b) assisting the rehabilitation of [incarcerated people] and their reintegration into the community as law-abiding citizens through the provision of programs in penitentiaries and in the community.

CCRA 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, taking into account [...] (c) the availability of appropriate programs and services and the person's willingness to participate in those programs.

Baker v. Canada (1999) confirms all administrative decision-makers, including CSC, must act with procedural fairness, a fundamental principle of justice in Canada.

CAEFS Recommendations: CSC must take all reasonable steps to manage perceived risk while maintaining the individual in the least restrictive environment. When interim placements do occur, CSC must ensure that the person and their legal counsel are given sufficient time to review all relevant documentation in accordance with the principles of procedural fairness. CAEFS continues to call for the closure of the Structured Intervention Units and maximum-security units in federal prisons designated for women, as their structure and conditions are incompatible with the principles of *Creating Choices*.

Structured Intervention Unit and Observation Cells

Description: CAEFS received reports that two individuals recently placed in the Structured Intervention Unit (SIU) were quickly subsequently transferred to an observation cell. As a result, they reportedly did not receive required documentation related to their SIU placement—such as written reasons—and experienced confusion regarding review timelines and CSC's legal obligations.

Discussion: The IMT explained that placements in the SIU and observation cells are separate processes but acknowledged that a person may be moved to an observation cell either during a transfer to the SIU or while already in the SIU, if deemed necessary by Mental Health. They noted that placement in an observation cell overrides the SIU placement.

Law & Policy:

CCRA s.70: The Service shall take all reasonable steps 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

CAEFS Recommendation: Research shows that the practice of segregation causes adverse impacts on the health and wellbeing of people who are incarcerated, and that CSC should end all forms of segregation, including Structured Intervention



Units and observation cells. CAEFS continues to call for the closure of the Structured Intervention Units in federal prisons designated for women, as their structure and conditions are incompatible with the principles of *Creating Choices*. Mental health responses must uphold the dignity of incarcerated individuals and be grounded in patient-centred care.

Timely Assessments and Applications

Description: CAEFS received reports that 45-day Structured Casework Records are either not being completed or not being completed in consultation with the incarcerated person. Delays in risk assessments were also reported, reportedly due to insufficient funding, which is impacting access to Escorted Temporary Absences (ETAs), as assessments are said to expire every two years. These delays are creating gaps between ETAs. Additionally, parole officers are reportedly holding completed parole applications for extended periods—sometimes weeks—before submitting them to the Parole Board, delaying the process.

Discussion: The IMT offered to follow up on the 45-day reviews and noted that further intervention may be needed. They stated that delays in risk assessments are due to difficulties securing qualified clinicians, not a lack of funding. Regarding parole applications, the IMT explained that if a parole officer has not recently met with the applicant, they may want to speak with the person before submitting the application.

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.

CD 710 -1, s. 14: The Correctional Officer II/Primary Worker will meet with the [incarcerated person] and complete a Structured Casework Record as outlined in Annex B within 45 days of admission to federal custody, arrival at an institution or case reassignment, and every 45 days thereafter.

CD 700 s.10(5): The Parole Officer will facilitate the [incarcerated person's] reintegration into the community at the earliest possible time while ensuring public and staff safety in all case management decisions

CAEFS' Recommendations: Conditional release offers individuals the best opportunity for successful reintegration. According to the Parole Board of Canada, gradual release—also known as the continuum of release—is the most effective way to support reintegration into the community. Timely completion of assessments, adherence to casework recording requirements, and ensuring that Parole Officers do not impede an individual's right to appear before the Board are essential to effective cascading and conditional release, both of which align with CSC's mandate.

Access to Information: Federal Election

Description: CAEFS received reports that voting in the Federal election on April 16th proceeded smoothly. People noted that not having to pre-register reduced barriers and made the process more accessible. However, they expressed frustration over limited access to information about party platforms and candidates in their home ridings, and disappointment that voting occurred before the English-language debate.

Discussion: The IMT reported that 170 incarcerated individuals at GVI participated in the election. They noted that the voting date for incarcerated people is determined externally and is not a site-level decision.

Law & Policy:



CCRA, s.4(d): [incarcerated people] retain the rights of all members of society except those that are, as a consequence of the sentence, lawfully and necessarily removed or restricted.

CAEFS' Recommendations: CAEFS was encouraged to hear that many individuals at GVI exercised their right to vote in the recent federal election. This high level of engagement reflects a strong desire among incarcerated people to participate in civic life and highlights the need for accessible, relevant information about candidates in their home ridings. A meaningful step forward would be for Elections Canada to schedule the voting day for incarcerated individuals after the leaders' debates in both official languages.

Access to Health Care in the MSU

Description: CAEFS received reports that people in the MSU are facing barriers to accessing health care. Individuals report an ongoing shortage of request forms, making it difficult to initiate care. Some shared concerns that even when forms are available and submitted, they may not reach Health Care—or reach them in a timely manner. As a result, people sometimes attempt to speak with the nurse during medline, though this raises confidentiality concerns. Others report calling MCCC to request a visit from Health Care, but are asked to disclose their reason, which further compromises privacy.

Discussion: The IMT reported that a nurse is present in the MSU from 7:00 a.m. to 3:00 p.m., Monday to Friday. They stated that the issue of request form availability was addressed last year and reported that forms are now reliably accessible to the MSU population, though they acknowledged they continue to have some concerns about form hoarding.

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.

CD 701 s. 8(b): the confidentiality of an [incarcerated person's] personal health information will be maintained, except where disclosure is permitted pursuant to the CCRA, the *Privacy Act*, or when the information is relevant to [their] risk or to the risk of others

CAEFS Recommendations: Given 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, etc., it is incumbent on CSC to center the dignity and care of these individuals. CAEFS encourages GVI to prioritize clear communication about how to access health care and to ensure that non-health care staff respect patient privacy and the autonomy of health care professionals.

