



Grand Valley Institution for Women
1575 Homer Watson Blvd Kitchener, ON N2P 2C5

June 24th 2025

CAEFS' May 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 May 30th via Teams.

This letter summarizes reports we received and conditions we observed during our visit to the Grand Valley Institution on May 27th to 29th 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



Security Level Reviews

Description: Three individuals requested that their concerns regarding security level reviews be brought to the attention of the Institutional Management Team and provided written consent to do so. To preserve confidentiality, their reports are summarized here. They described significant delays, inconsistent communication, and procedural gaps in the security classification process. Reported concerns included postponed or cancelled Warden's Boards, conflicting information about upcoming OSLs, lack of documentation related to security "levels" in maximum security, delayed transfers following approved lower classifications, and years-long waitlists for access to Indigenous core programming. One individual also reported not being supported in having a Peer Advocate attend a related meeting with the Security Intelligence Officer and, as a result, felt uncomfortable proceeding. These issues have reportedly impeded disrupted timely correctional and reintegration planning.

Discussion: The IMT acknowledged that one of the individuals had submitted multiple requests and that the matter is now the subject of a final-level grievance. They indicated that the other concerns had either already been addressed with the appropriate staff member or would be followed up on.

Law & Policy:

CCRA s. 4 (c.2): the Service ensures the effective delivery of programs to [incarcerated people], including correctional, educational, vocational training and volunteer programs, with a view to improving access to alternatives to custody in a penitentiary and to promoting rehabilitation.

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

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

CAEFS' Recommendations: CAEFS recommends that the CSC should take immediate steps to reduce delays and ensure consistency in security level reviews and prompt institutional transfers following reclassification. Individuals should be supported in navigating the process with transparency, access to support, and timely documentation. Improving access to culturally relevant programming and addressing long waitlists—particularly for Indigenous core programs—is also essential to supporting reintegration and the principle of least restrictive measures.

Access to Family: Funeral Attendance

Description: It was reported to CAEFS that an Indigenous individual was unable to attend a family funeral due to logistical challenges, as the service was held on a remote reserve in the Prairie region. He shared that arrangements had been made by his Case Management Team and he believed he would be permitted to attend; however, the escorted temporary absence was ultimately denied. He also reported being involuntarily transferred to Grand Valley Institution, which has further hindered his ability to maintain family connections. This marks the eighth funeral he has been unable to attend while in CSC custody.

Discussion: The IMT stated that the Case Management Team made significant efforts to support the individual's attendance at the funeral; however, the complexity of the logistics and limited advance notice reportedly made the trip unfeasible. They also noted that staff escort safety and security concerns contributed to the decision to deny the request. The IMT indicated they would consider a voluntary transfer if the individual were to request one. CAEFS agreed to relay this information but clarified that no such request had been made at this time.

Law & Policy:

CCRA s. 17 (1): The institutional head may [...] authorize the temporary absence of an [incarcerated person] [...] if the [incarcerated person] is escorted by a staff member or other person authorized by the institutional head and, in



the opinion of the institutional head [...] (b) it is desirable for the [incarcerated person] to be absent from the penitentiary for [...] compassionate reasons;

CD 710-3 s. 15: ETAs for compassionate reasons may be granted in the following instances unless information exists that, in the opinion of the Institutional Head (when the Institutional Head is the granting authority), the risk is unassumable for the protection of society, staff, and/or the [incarcerated person] [...] (a) to attend the funeral of a member of the [incarcerated person's] immediate family (or extended family for Indigenous [people under federal sentence]) or other persons with whom the [incarcerated person], in the opinion of the Institutional Head, has had a close personal relationship [...]

CCRA 4 (c.1): the Service considers alternatives to custody in a penitentiary, including the alternatives referred to in sections 29 and 81;

CAEFS' Recommendations: One of the core reasons for establishing federally designated women's penitentiaries in each region was to promote close community and familial contact for incarcerated women and gender-diverse people. This case underscores the particular challenges faced by Indigenous individuals from remote communities and reserves, and the significant barriers they encounter in returning home to grieve with their families—even when institutional staff are supportive. This reality highlights the urgent need for alternatives to custodial sentences for Indigenous people, as well as the expansion of community-based Section 81 agreements, to mitigate the disproportionate and harmful impacts of incarceration on Indigenous individuals and their families.

Modified Movement

Description: It was reported to CAEFS that children are currently residing on the main compound, and that several individuals with specific convictions were told by staff in the prison they may only leave their living units to attend school, work, or programs, with no access to porches permitted. CAEFS was also informed that two other individuals were explicitly instructed by officers not to interact with the children, citing their convictions. It was noted that this approach is unusual; historically, a memo has been distributed to the entire population to clarify expectations when children are present on the main compound.

Discussion: The IMT stated that this was the first time they had heard these concerns and clarified that there is no expectation for individuals with specific convictions to follow a modified movement schedule. They noted that the reported restrictions may reflect the personal views of some officers rather than institutional policy.

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].

CAEFS' Recommendations: Given that many individuals incarcerated in federal prisons designated for women were primary caregivers at the time of their arrest, it is essential to support parent-child relationships for the well-being of both the child and the parent—while also respecting the rights of others in custody. CAEFS encourages all staff at GVI to foster a safe and inclusive environment, and to be especially mindful that actions or comments do not contribute to lateral violence.

Fundraisers and Events for Committees

Description: It was reported to CAEFS that a recent memo limits each group or committee to one fundraiser or event every two years, with only smaller, internal events permitted in between. Committees expressed concern that this could prevent meaningful recognition of events such as PRIDE and Black History Month, potentially reducing opportunities to foster understanding and inclusion within the broader population. Individuals also raised concerns about restrictions on their right to peaceful assembly and diminished agency over how funds are raised and spent under existing directives. Additionally, the memo reportedly limits ethnocultural and bead orders to three times per year, which individuals said restricts access to important cultural items. Finally, it was reported that each committee contributed \$100 to a volunteer appreciation event that



ultimately did not take place; instead, a small gift was distributed. Committees expressed concern that the contribution did not align with the outcome and felt that it did not reflect appropriate recognition of volunteers.

Discussion: The IMT confirmed that the number of events and fundraisers has been reduced due to limited resources / space and staffing capacity, particularly given the increased population size. For example, they noted that there are not enough chairs in the gym to accommodate all attendees, and renting additional chairs is costly. The IMT explained that staff resources—especially Social Program Officers—are being prioritized for the Social Integration Program, Peer Mentor initiatives, and other reintegration-focused efforts. They also shared that they have partnered with Community Justice Initiatives (CJI) to host this year's PRIDE event, and intend to continue this collaboration to help alleviate staffing pressures. Regarding ethnocultural and bead orders, the IMT indicated that some of the items are already available through other sources accessible to the population and that a further review of ordering processes is underway. Finally, the IMT clarified that no committee funds were used for the volunteer appreciation gifts, which were purchased using a separate budget.

Law & Policy:

CCRA s. 73: [Incarcerated people] are entitled to reasonable opportunities to assemble peacefully and associate with other [incarcerated people] within the penitentiary, subject to such reasonable limits as are prescribed for protecting the security of the penitentiary or the safety of persons.

Creating Choices, Overall Statement of Principle: The Correctional Service of Canada, with the support of communities, has the responsibility to create the environment that empowers federally sentenced women to make meaningful and responsible choices in order that they may live with dignity and respect.

Creating Choices, Principle #1: Empowerment

CAEFS Recommendations: Peer-led committees are a core component of the Creating Choices model of incarceration. These committees and their associated events provide individuals with opportunities to build community, contribute positively to the institutional environment, and develop transferable vocational skills that support successful reintegration. Committees foster a culture of democracy, shared responsibility, and empowerment, and should be actively supported within penitentiary settings as part of reintegration efforts. CAEFS also encourages clear and timely communication with committees regarding how funds will—or will not—be used.

Privacy and Privileged Conversations: Intercoms in Maximum-Security Program Rooms

Description: It was reported to CAEFS that, following a meeting with a Peer Advocate in the upper program room of the maximum-security unit, an individual was questioned by the Security Intelligence Officer (SIO). She was informed that staff had listened to their conversation via the room's intercom and was asked specific questions about what was discussed. The individual reported that this experience has since deterred her from seeking further support from a Peer Advocate. CAEFS was also informed that the possibility of staff listening in raises serious concerns about access to privacy, particularly as program rooms are also used for confidential phone calls with legal counsel, clinical appointments, and meetings with CAEFS.

Discussion: The IMT offered to follow up on this report with the SIO. Written consent from the individual was provided.

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' Recommendation: CAEFS appreciates the IMT's offer to follow up and encourages GVI to confirm whether conversations in program rooms can be listened to via intercom without the occupant's knowledge. If so, GVI should ensure that individuals in the maximum-security unit have access to a space where confidential and privileged conversations can take place without fear of surveillance.



Physical Conditions of Confinement: Preparing for Extreme Heat

Description: Individuals shared with CAEFS growing concerns about exposure to extreme heat during the summer months and the potential health impacts. It was reported that people would like the option to keep more than one fan in their rooms and to purchase portable air coolers that do not require window modifications, in order to help maintain a reasonably cool temperature within their living units. Additionally, it was reported that the ceiling fans in the living units on the main compound are covered in dust and dirt, and that residents are unable to reach them for cleaning.

Discussion: The IMT stated that individuals would not be permitted to have more than one fan in their rooms or access to air coolers due to security concerns and the increased electrical load. They also confirmed that no cooling stations would be provided. The IMT noted that national plans are being developed to potentially transition away from residential-style living units, and that some of these concerns may be addressed through that process, although implementation is still years away. Regarding the ceiling fans, the IMT acknowledged that the issue had also been raised by the Office of the Correctional Investigator and confirmed that all fans have since been cleaned and that a monthly checklist has been implemented to ensure ongoing maintenance.

Law & Policy:

Section 12 of the Charter: Everyone has the right not to be subjected to any cruel and unusual treatment or punishment

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. S83(1): the Service shall, to ensure a safe and healthful penitentiary environment, ensure that all applicable federal health, safety, sanitation and fire laws are complied with in each penitentiary and that every penitentiary is inspected regularly by the persons responsible for enforcing those law.

CAEFS' Recommendations: CAEFS recommends that Grand Valley Institution develop and implement a high/extreme heat protocol that prioritizes the health and well-being of the incarcerated population. This protocol should be created in collaboration with appropriate public health authorities and incarcerated individuals, and be aligned with the CCRA and CCRR. At a minimum, it should include: the installation of thermostats in living units to accurately monitor temperatures; ensuring that all windows in living units can open fully to allow adequate airflow; and the provision of fans, free of charge, to all incarcerated individuals. Fans should be appropriately sized for the living space, and multiple fans should be permitted in cells upon request.

Escorted Temporary Absences and Work Releases

Description: It was reported to CAEFS that all but one of GVI's work release contracts have been cancelled or are not being renewed. Individuals indicated that this is due to significant delays in approval processes, which have made it unsustainable for businesses to maintain partnerships with GVI. It was also reported that many escorted temporary absences (ETAs) available prior to COVID are no longer active, resulting in limited opportunities overall. CAEFS also received reports that a lack of volunteers continues to limit access to ETAs. There is concern that the reduction in events further decreases opportunities for individuals to meet the required number of meaningful contacts needed to qualify for ETAs. As a result, most ETAs now operate on a rotational basis, with individuals going out only every few months on approved ETAs that occur weekly or bi-weekly.



Discussion: The IMT shared that they are currently undergoing a staffing transition for the work release coordinator position but are actively engaging with employers and believe progress is being made. They also noted that a full-time volunteer coordinator is now in place and is continuing to recruit volunteers, including through a partnership with a local community organization. CAEFS raised concerns that fewer events mean fewer opportunities for new volunteers to participate in the meaningful interactions required for non-security escort training. In response, the IMT stated that new structured activities are being developed.

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 (c.2): the Service ensures the effective delivery of programs to [incarcerated people], including correctional, educational, vocational training and volunteer programs, with a view to improving access to alternatives to custody in a penitentiary and to promoting rehabilitation.

CAEFS' Recommendations: Ensuring consistent access to temporary absences aligns with CSC's legislated purpose, as conditional release provides the strongest opportunity for successful reintegration. The Parole Board of Canada emphasizes that gradual, structured release—known as the continuum of release—is the most effective approach to community reintegration. CAEFS appreciates GVI's ongoing efforts to recruit volunteers and to facilitate access to work releases and other forms of temporary absence.

Access to Conditional Release: Parole Officers and Primary Workers

Description: CAEFS received reports that Primary Workers are backfilling Parole Officer roles. Individuals shared concerns that Primary Workers acting as Parole Officers are not providing accurate or complete information about the parole process. CAEFS also heard reports of frequent changes in assigned Parole Officers, even during short sentences. These issues have reportedly led to confusion, conflicting information, and delays in parole progression.

Discussion: The IMT explained that in some cases, Primary Workers who have also received Parole Officer training may temporarily fill those roles as part of their career development. They acknowledged that changes to a person's Case Management Team can occur and may sometimes contribute to a sense of instability.

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 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

CD 700 s.9(5): The Manager, Assessment and Interventions/Manager, Intensive Intervention Strategy/Parole Officer Supervisor/Manager, Community Correctional Centre, will [...] ensure the quality control of case management activities.

CAEFS' Recommendations: CAEFS encourages GVI to identify ways to promote continuity and consistency in case management, even when changes to an individual's Case Management Team occur, to better align practices with CSC's



legislated purpose. It is essential that staff development opportunities do not negatively impact incarcerated individuals or conflict with CSC's overall mandate.

Timely Responses to Grievances

Description: CAEFS received reports that initial-level grievances are being extended multiple times, resulting in significant delays in addressing concerns. Individuals also reported being prevented from escalating these delayed grievances to the final level, even when they are dissatisfied with how long it is taking to receive a response.

Discussion: The IMT acknowledged that some grievances require extensive investigation, which can extend response times. A member of the IMT also shared that they would not encourage individuals to file grievances, expressing a belief that the process is not an effective way to resolve issues. CAEFS emphasized that the grievance process is the legislated mechanism for federally incarcerated individuals to address concerns. The IMT noted that several grievances alleging discrimination were, in their view, related to staff performance issues. CAEFS responded that we continue to support individuals in understanding these distinctions and are developing related resources. The IMT also noted that when concerns involve staff performance, and individuals are hesitant to file a grievance due to fear of retaliation, they may request to speak directly with a manager.

Law & Policy:

CCRA s. 91: Every [incarcerated person] shall have complete access to the [internal] grievance procedure without negative consequences.

CCRR, s. 74 (1): If an [incarcerated person] is dissatisfied with an action or a decision by a staff member, [they] may submit a written complaint to the supervisor of that staff member. (2) **Where a complaint is submitted** pursuant to subsection (1), every effort shall be made by staff members and the [incarcerated person] to resolve the matter informally through discussion. [emphasis added]

CAEFS' Recommendations: The grievance system is the legislated mechanism through which individuals can address the issues they face. When incarcerated people use the complaint and grievance process, they are resolving conflicts in ways that align with law, policy, and the principles of Creating Choices. CAEFS is committed to fostering legal literacy within penitentiaries and encourages GVI to work collaboratively with us to ensure that access to the grievance system is supported, accessible, and free from barriers.

Access to Information: Provincial Segregation Class Action

Description: CAEFS did not observe any posters at GVI related to the provincial segregation class action lawsuit. One individual reported asking a correctional officer for a claims package and was redirected to CAEFS.

Discussion: The IMT shared that claims packages had been received and that they had requested additional packages. However, they were unable to confirm during the meeting whether those additional packages had arrived. They also noted that no posters regarding the class action had been received but committed to looking into the matter.

Law & Policy:

CCRA s. 4 (b): the Service enhances its effectiveness and openness through the timely exchange of relevant information with victims, [federally sentenced people] and other components of the criminal justice system and through communication about its correctional policies and programs to victims, [federally sentenced people] and the public;



CAEFS' Recommendations: Given the limited access incarcerated individuals have to information, CSC holds a unique responsibility to proactively share legal information and opportunities for remedy—even when not legally required. Doing so reflects a commitment to justice and aligns with CSC's stated principles of open and effective information sharing.

