



To: Lilian Kordic, Institutional Head  
Edmonton Institution for Women  
11151 178 St NW Unit 1, Edmonton, AB T5S 2H9

July 14th, 2025

Dear Lil,

I want to thank members of the institutional management team (IMT) at the Edmonton Institution for Women (EIFW) for taking the time to meet with me on June 19th, in person at EIFW.

This letter summarizes reports received and conditions observed during our visit to the Edmonton Institution for Women from June 18<sup>th</sup> and 19<sup>th</sup> and provides 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,

Jacqueline Omstead  
Senior Advocate



## **Disciplinary Procedure: Informal Resolution and Court Scheduling**

**Description:** CAEFS received reports that disciplinary charges are not being informally resolved, even when marked as such on the institutional disciplinary charge forms. In one instance, a CSC employee wrote on the charge form that “informal resolution was not utilized due to the nature of the offence”. The alleged disciplinary infraction was for an individual entering a living unit where they did not reside. It was also reported that both minor and major court are held only once per month, with charges often taking two to three months—or longer—to be resolved. Individuals who reported that there is a lack of informal resolution expressed concern that unresolved disciplinary charges, and punitive responses to their actions are delaying their ability to cascade to lower security levels and access parole.

**Discussion:** The IMT shared that they are working to develop systems to track instances where informal resolution is used and no charge is laid. They noted that the Correctional Officer Union had raised concerns about a lack of accountability, as they reported that repeated rule violations could be resolved informally without documentation. The IMT explained that when a charge sheet indicates informal resolution, it may not reflect previous similar incidents where no charge was issued. They shared that minor court is held weekly, while major court is scheduled monthly by EIFW, but proceeds depending on the availability of the Independent Chairperson. They noted that the pending status of a charge would be considered when making decisions related to security classification.

### **Law & Policy:**

CCRA s. 41 (1): Where a staff member believes on reasonable grounds that an [incarcerated person] has committed or is committing a disciplinary offence, the staff member shall take all reasonable steps to resolve the matter informally, where possible.

CD 580, s. 12: Informal resolution or attempts at informal resolution will (b): be documented in a Statement/Observation Report, submitted to the Correctional Manager to demonstrate its consideration and/or application in the process, and where applicable, noted in the unit log book by the witnessing staff member.

CD 580 s. 30: The initial hearing of serious and minor charges of a disciplinary offence will normally take place within 10 working days of laying of the charge.

**CAEFS’ Recommendations:** That informal resolution is legislatively required speaks to legislative intent for the disciplinary system to be used as a last resort, after all other manners of addressing institutional behaviour have been addressed, because of the serious impact that a disciplinary charge has on a person’s liberty. According to the Commissioner’s Directives, instances of informal resolution are documented through statement observation reports and noted in the unit logbook, and previous instances of informal resolution should be available to staff. Notwithstanding this, informal resolution must be attempted in every instance where a disciplinary charge is considered, regardless of instances of previous informal resolution. CAEFS notes that many of the behaviours that result in disciplinary charges in penitentiaries designated for women, such as sharing food, clothing, and visiting one another, are pro-social behaviours in the community, and instances of disciplinary charges reported to CAEFS often reflect individuals attempting to meet their social needs and develop/maintain social bonds while incarcerated.

## **Peer-Led Committees and Groups**

**Description:** CAEFS received several reports outlining barriers faced by volunteer led peer-led committees at EIFW. The Lifers Group shared that all activities and proposals related to their committee, including a proposal to host a Prisoner Justice Day gathering on August 8<sup>th</sup>, have been put on hold due to their reported classification as a committee rather than a group. The LGBTQ committee raised concerns about staff management of their fundraiser, noting that individuals were limited to purchasing only one item.



**Discussion:** The IMT shared that meetings with unit representatives occur regularly and that topic-specific meetings with the Inmate Committee have taken place on an ad hoc basis. They stated that the IC has been encouraged to reach out as needed but acknowledged there is room for improvement in scheduling regular meetings with the management team, as required by policy. The IMT noted that staffing resources, including their capacity for outside shopping, impacts fundraisers.

#### **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.

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.

**CAEFS' Recommendations:** Peer-led committees are a core component of the Creating Choices model of incarceration and are supported by principles set out in the Corrections and Conditional Release Act. These committees foster a culture of democracy, shared responsibility, and empowerment. Regular meetings between committees and management are essential to maintaining this culture. CAEFS appreciates EIFW's efforts to engage with committees and their openness to strengthening these processes to ensure alignment with policy.

#### **Institutional Clothing and Towels**

**Description:** CAEFS received reports that individuals are only permitted to exchange institutional clothing once per year, even when items are worn, damaged, or no longer fit due to weight changes. People shared that written requests to exchange clothing were denied based on the one-year timeframe. It was noted that, except for bras and underwear, all clothing is previously used and may wear out at different rates. Additionally, individuals raised concerns about the hygiene of being issued used towels and requested that they instead be provided with new towels.

**Discussion:** The IMT offered to confirm whether a specific timeframe exists for exchanging institutional clothing but did not believe it was limited to one year. They agreed that clothing should be exchangeable if damaged or worn through. The IMT also acknowledged the concern raised regarding the issuance of used towels.

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

CD 352 s. 6: Institutional Heads shall: (a) specify requirements for female [...] clothing [for incarcerated people], including the item and type, and the frequency and quantity of issue female [...] clothing [for incarcerated people] is usually purchased locally)

**CAEFS' Recommendations:** CAEFS encourages EIFW to ensure that all practices related to institutionally issued clothing and personal items prioritize dignity, health, and hygiene. This includes issuing new towels at intake, and providing clothing



that fits, is not damaged or excessively worn, and allowing exchanges as needed. We appreciate EIFW's commitment to reviewing the clothing exchange timeframe and supporting the replacement of worn through or damaged items.

### **Hygiene Products: Menstrual Products and Toilet Paper**

**Description:** CAEFS received reports that individuals are not receiving an adequate supply of menstrual products and are issued both tampons and pads, regardless of personal preference. Although additional tampons can be purchased through canteen using the hygiene budget, rising costs make it difficult to afford these alongside other essential hygiene items. Concerns were also raised about insufficient toilet paper allocations per living unit.

**Discussion:** The IMT agreed that individuals should be provided with adequate menstrual products and have access to the types they prefer. They also affirmed that people should receive the amount of toilet paper they require. It was noted that some may be using toilet paper for other purposes, such as tissues, which could affect overall usage. The IMT offered to look into whether national guidelines exist for the provision of these items.

### **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.

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**CAEFS' Recommendations:** CAEFS encourages EIFW to ensure that all practices related to institutionally issued hygiene items prioritize dignity, health, and cleanliness. This includes providing individuals with the menstrual products and toilet paper they require. We appreciate EIFW's commitment to reviewing the relevant national guidelines.

### **Conditions in the Maximum-Security Unit**

**Description:** CAEFS received reports that some action has been taken to address the presence of maggots in common areas, believed to be caused by rotting floorboards; however, concerns remain that more work is needed. Mold in the showers reportedly remains unaddressed, and clogged drains in the pods are backing up and emitting sewage odors. Individuals shared that maintenance requests are often ignored unless followed by formal complaints or raised through CAEFS.

Separately, individuals in the maximum-security unit reported difficulty accessing information about engagement opportunities (e.g., community visits, events, and programs). Posters are often placed outside the pods, limiting visibility. As a result, people are often unaware of the opportunities that are available to them on the main compound. It was requested that copies of all posters be distributed directly to each pod.

**Discussion:** The IMT shared that a plan is in place to address the reported floorboard issues over the coming months. They noted that mold in the showers had been cleaned, that instructions were provided to residents following caulking, and that day-to-day cleaning remains the responsibility of incarcerated unit cleaners. The IMT also reported that blackout curtains are being installed in general population units ahead of an upcoming heat wave and that air conditioning units have been added to the maximum-security common areas. The IMT acknowledged the request for posters to be distributed directly to each pod.

### **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.

**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 Maximum-Security Units and the Structured Intervention Units. While these units continue to exist, CAEFS appreciates EIFWs efforts to address reported concerns.

### **Residential Mother-Child Program & Support for Pregnant Indigenous Woman**

**Description:** CAEFS met with a pregnant Indigenous woman who was over a week overdue. She had arrived at EIFW from Winnipeg, Manitoba, five months pregnant, and is serving a sentence of just over two years. She is currently housed in medium security. Upon arrival, she reports writing to the mother-child coordinator, expressing her interest in participating in the program. She completed all required programming and assessments, and reports that the results were positive and supportive of her participation. She shared that she was not informed about what to expect during her hospital stay, asking whether she would be provided food and whether the baby would be supplied with clothing.

She reported being unsure whether she received her initial intake paperwork and noted that she does not have a copy of her Correctional Plan but has completed the Indigenous Women's Engagement Program. She also shared that, during an early meeting with her Institutional Parole Officers, she was told to waive her day parole hearing because she would not have completed her programming by her eligibility date this summer.

Although she reported that she was approved for a transfer to the Okimaw Ohci Healing Lodge (OOHL), she declined due to concerns about the distance from the nearest hospital (approximately 1.5 hours away), given her pregnancy. She also reported being told by peers that there is no residential mother-child program at OOHL. She stated that no one discussed the option of applying to transfer from EIFW to Eagle Women's Healing Lodge in Winnipeg with her, as she was told she would first need to go to OOHL.

As a result of these circumstances, she anticipates that her newborn will be placed in foster care in Manitoba, where she will have no access to her child while incarcerated at EIFW.

She expressed deep concern about the impact this separation will have on her mental and physical wellbeing. She shared that she was in foster care herself, that one of her parents attended residential school, and that being separated from her child would be profoundly traumatizing.

**Discussion:** At the time of the meeting with the IMT, the individual had been taken to the hospital. The IMT indicated they were not very familiar with her case but offered to follow up and suggested she connect with her Parole Officer upon her return.

The IMT stated that they believe she has been waitlisted for the Indigenous Medium Intervention Program (MIPs) and noted that two full MIPs are currently running to address the waitlist. They also shared that EIFW has supported many pregnant women in the past and emphasized that the institution has a supportive staff team and environment.

CAEFS and the IMT discussed the importance of Parole Officers clearly explaining what it means to not be supported for parole; specifically, that a lack of support does not impact an individual's legal eligibility for parole or right to appear before the Parole Board. This clarification could help address discrepancies between what incarcerated individuals report to CAEFS and what is conveyed by Parole Officers to the IMT.

### **Law & Policy:**



Section 71 (1) of the CCRA: 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.

Section 28 of the CCRA: 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 an environment that contains only the necessary restrictions, taking into account [...] (b) accessibility to (i) the person's home community and family.

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:** Attention must be given to the specific needs of Indigenous mothers, who are disproportionately impacted by the systemic inequities of colonialism and the trauma of separation from their children. The separation of Indigenous mothers and children because of federal decisions perpetuates colonial harm and undermines reconciliation efforts. Every effort should be made to ensure that all mothers—especially Indigenous mothers—can maintain parenting responsibilities and reside with their children. CAEFS encourages CSC to take all necessary steps to support parent-child contact, including through the Mother-Child Program and by prioritizing healing lodges and community-based alternatives to incarceration wherever possible. CAEFS appreciates EIFW's support in helping incarcerated individuals understand their rights related to conditional release, so they can make informed decisions.

