



To: Joanne Floud, Acting Warden
Grand Valley Institution for Women
1575 Homer Watson Blvd, Kitchener, ON, N2P 2C5

August 26th, 2025

CAEFS' July 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 August 6th via Teams.

This letter summarizes reports we received and conditions we observed during our visit to the Grand Valley Institution on July 29th – 31st 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



Impact of Information Management on Correctional Plan Progress and Peer Relationships

Description: CAEFS received reports that security intelligence information is not being disclosed to individuals (or their case management teams) until after they apply for conditional release, institutional employment, or undergo a security level review. People reported that this approach does not feel aligned with CSC's rehabilitative and reintegrative mandate, and that it is quite harmful to them and prevents people from progressing through their correctional plans. For example, it was reported to CAEFS that a frequent occurrence is where people applied for an escorted temporary absence with the support of their case management team, and only after applying did their team learn of security intelligence information that led the individual's case management team to pull their support and suggest that the individual withdraw their application.

CAEFS also received reports that this practice perpetuates interpersonal harm, creating negative consequences for their relationships with peers, and in some instances, their safety, resultantly. People shared with CAEFS that it is well known that inaccurate information sharing can be strategically used to harm others, and that this reality is not adequately taken into consideration by GVI staff. Further, people shared that when information about them is reported by peers, that they would like the opportunity to share their perspective as part of the investigation, prior to information being documented about them in a way that creates an appearance that the information is factual.

Discussion: The IMT shared that the onus is on Case Management—specifically Parole Officers or Primary Workers—to remain up to date on the information in their caseloads and to understand the Security Intelligence Officer's (SIO) perspective before proceeding with applications. CAEFS and the IMT discussed a possible link between these reported concerns and earlier reports that 45-day reviews are not occurring consistently. The IMT agreed to remind staff of the importance of proactively engaging with the SIO department. CAEFS will continue to support individuals in working collaboratively with their Case Management teams.

The IMT did not agree with the reported concerns regarding peer allegations. They stated that processes exist for resolving interpersonal issues and emphasized that it is not their practice to accept all reports at face value.

Law & Policy:

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

CD 710-1, s. 12: 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 710-1, Annex B, s. 3: Describe your interactions with the [incarcerated person] over the past 45 days. In addition, summarize any consultation comments from staff and/or other collateral contacts that have had interactions with the [incarcerated person] during the previous 45 days. **Consultations must include** but are not limited to: Parole Officer and when applicable, Employment Supervisor, Correctional Program Facilitator, Correctional Manager, Psychologist, Elder, Chaplain, Spiritual Advisor, **Security Intelligence Officer**, Psychiatrist, health care personnel, volunteers, Visits and Correspondence Officers [emphasis added].

CAEFS' Recommendations: CAEFS recommends that GVI ensure 45-day reviews are completed consistently and thoroughly, to support individuals in progressing through their correctional plans in an informed, timely, and transparent manner. CAEFS further encourages GVI to respond to alleged intelligence in ways that prioritize the least restrictive measures, reflect the principles of *Creating Choices*, and ensures that individuals' rights to due process, a right maintained during incarceration, is not violated.



Physical Conditions of Confinement: Living Units on Main Compound

Description: CAEFS received reports that living units on the main compound are in disrepair, including persistent water damage, mould, and temporary surface-level fixes. For example, both House 6 and House 14 reported significant water damage. People shared with CAEFS their perception that current infrastructure issues are being deprioritized in favour of the 25-year capital plan, and that their current living environment is unsafe, unclean, and lacking in dignity. CAEFS also received reports of ongoing adverse impacts from extreme heat in living units.

Discussion: The IMT agreed to follow up on the reported concerns regarding Houses 6 and 14, noting they were not previously aware of any issues. They outlined current and scheduled repairs to living units and described the systems in place for reporting concerns. The IMT stated that hazardous or unsafe conditions are addressed immediately, emphasizing that such conditions pose risks to both incarcerated individuals and staff, and that staff also play a role in identifying issues.

In response to concerns about extreme heat in the living units, the IMT shared that they are consulting with other sites to identify effective heat-mitigation strategies. The Stores department has requested approval for blackout curtains, with priority given to units most exposed to direct sunlight. The IMT also noted that cooling stations are in place, and that additional stations were recently supplied to program areas. Finally, the IMT confirmed receipt of a proposal from the Inmate Committee regarding gym fans and stated that identified fans are under review by relevant departments to address any safety or electrical concerns before implementation.

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(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 laws.

CAEFS' Recommendations: CAEFS is encouraged by the initial steps GVI has taken to address the longstanding concerns related to extreme heat in the living units. To promote transparency and accountability, CAEFS continues to recommend the development of a high/extreme heat protocol that prioritizes the health and well-being of the incarcerated population. This protocol should be developed in collaboration with relevant public health authorities and incarcerated individuals, and align with the CCRA and CCRR. CAEFS also encourages GVI to communicate planned repairs and maintenance priorities to the Inmate Committee and to consult regularly with House Representatives regarding outstanding maintenance needs and the status of existing work orders.

Access to Family: Visitor Applications and PIN List Approvals

Description: CAEFS received reports that it takes 2–4 weeks to add persons to PIN lists, delaying phone contact with family and community-based supports. People shared concerns about how phone numbers are approved, noting that many people do not answer calls from unknown or unexpected callers. People also reported to CAEFS that they are experiencing ongoing challenges with the visitor application process, describing it as complicated, redundant, and invasive. It was suggested by the population that providing prospective visitors with the option to apply online via email or in-person (either at the site or at a local parole office) would streamline access and reduce confusion. For example, people shared that they have had loved ones accidentally miss a section on the application or make an error, but they do not know that this has occurred until their application is received via the mail, reviewed, and then mailed back to them. At that point, they must mail the application in again via mail. If this process was done via email or in person, then this would mitigate this kind of delay. People also shared



concerns about the sensitive information requested for the application going missing in the mail, which would also be mitigated with in-person or email applications. Given that connection with family is considered as part of the risk assessment for federally sentenced people, people reported that a lack of in-person visits will be viewed negatively by the Parole Board or impact conditional release planning (for example UTAs to visit home or considerations for Day Parole other). Overall, these timeframes have negative consequences for peoples' abilities to maintain community and familial relationships while in custody, which can lead to lifetime adverse impacts.

Discussion: CAEFS and the IMT acknowledged that V&C staff are required to follow the existing process, which is determined at the national level and not by the site.

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

CAEFS' Recommendations: A key rationale for establishing regional penitentiaries designated for women was to promote close community and familial contact for federally sentenced women and gender-diverse individuals—a goal clearly articulated in *Creating Choices*. All CSC decisions should be guided by a commitment to facilitating the broadest and most accessible opportunities for connection with community and family. CAEFS encourages CSC to modernize its visitor application and PIN list approval processes, including adopting suggestions from the incarcerated population—such as offering prospective visitors the option to apply via online or in person (either at the institution or a local parole office).

Access to Meaningful Employment Programming

Description: CAEFS received reports of limited access to employment programming, particularly opportunities perceived as meaningful or skill-building. People were particularly concerned about the perceived disparity in access to trades training between prisons designated for men and those for women, which people are concerned may affect long-term reintegration and job prospects. A suggestion from the population was to enable incarcerated individuals to contribute to physical repairs and facility upkeep through skilled trades training and employment programming, addressing two reported concerns in one.

Discussion: The IMT shared that GVI offers 74 vocational courses—reportedly the highest number in the region—and issued 1,085 vocational certificates last year. While recognizing the value of these certifications, CAEFS raised questions about how they translate into ongoing employment opportunities. Specifically, CAEFS noted that receiving a certificate early in a long sentence may carry less value than being able to demonstrate sustained employment in a skilled trade. The IMT agreed to look into employment statistics and shared that efforts are underway to identify additional supervisors to expand employment opportunities.

Law & Policy:

CCRA s. 76: The Service shall provide a range of programs designed to address the needs of [federally sentenced people] and contribute to their successful reintegration into the community.



CCRA s. 4(c.2) the Service ensures the effective delivery of programs to [federally sentenced 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: CAEFS acknowledges GVI's efforts to provide vocational programming and encourages the continued expansion of access to meaningful, skilled job training and employment opportunities. These opportunities should be available both within the institution and through work-release programs, with particular focus on the skilled trades. Ensuring that incarcerated individuals have consistent access to such opportunities throughout their sentence is central to CSC's reintegrative mandate.

Conditions in the Maximum-Security Unit: Access to Rehabilitative and Reintegrative Supports

Description: People incarcerated in the maximum-security unit report extremely limited access to programs, mental health support, spiritual care, and personal development opportunities, leading to the feeling of being "warehoused." It was reported to CAEFS that the isolating conditions cause increased social anxiety and deteriorating mental health. To help mitigate some of this social isolation, House Representatives suggested allowing inter-pod mixing and shared access to outdoor space. CAEFS also received reports that the process for facilitating access to activities is inequitable and is contributing to interpersonal tension.

Discussion: The IMT explained that limited space in the unit creates challenges for programming. They shared that a chaplaincy program will be added in September and that Dialectical Behaviour Therapy (DBT) will be offered in the secure unit following the addition of new Behavioural Interventionists. One individual has already completed DBT by attending sessions in the Supported Living Environment, and another is currently participating. At this time, the IMT shared that they do not support intermixing pods due to interpersonal dynamics and incompatibilities within the unit.

Law & Policy:

CCRA s. 76: The Service shall provide a range of programs designed to address the needs of [federally sentenced people] and contribute to their successful reintegration into the community.

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 [incarcerated 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: CSC is legislated to support the rehabilitation and reintegration of incarcerated individuals into the community. From this perspective, those held in maximum-security units should have the greatest access to supports—not the least. Yet, limited access to programming, health care, spiritual care, and personal development opportunities remains a consistently reported concern that has only worsened over time. The structure and conditions of maximum-security units stand in direct contradiction to the principles set out in *Creating Choices*. While these units continue to operate, CAEFS urges GVI to limit their use wherever possible.

Conditions in the Minimum-Security Unit: Access to Rehabilitative and Reintegrative Supports

Description: CAEFS received reports that people in the MSU are experiencing barriers to programming, cultural activities, and other supports, which are often offered only on the main compound or in the community under conditional release.



Individuals in MSU also report feeling "warehoused" due to limited on-site resources and minimal access to community. CAEFS received a suggestion that permitting independent walking along the driveway would be supportive for people's mental and physical wellbeing, noting that the designated path is not very accessible for those with mobility issues.

Discussion: The IMT shared that an SPO is assigned to the MSU and currently facilitates a program, and that peer mentor training is scheduled to be offered in the fall. They noted that two programs were recently cancelled in the MSU due to low participation and were relocated to the main compound. However, they stated that a number of other programs and escorted temporary absences remain available. CAEFS and the IMT discussed how to reconcile the discrepancy between the concerns reported by individuals on the unit and the programming the IMT indicates is available. The IMT was not supportive of individuals walking the driveway unaccompanied.

Law & Policy:

CCRA s. 76: The Service shall provide a range of programs designed to address the needs of [federally sentenced people] and contribute to their successful reintegration into the community.

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 [incarcerated 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: CSC is legislated to support the rehabilitation and reintegration of incarcerated individuals into the community. Gradual release—referred to as the continuum of release—is the most effective approach to reintegration. From this perspective, individuals in minimum-security units should be recognized as being furthest along this continuum among those in federal custody. In light of this, CAEFS recommends that individuals in minimum security have consistent and frequent access to temporary absences into the community, along with minimal restrictions on their movement within the institution—including around the perimeter—to best support their transition to community-based supervision and fulfill CSC's reintegrative mandate.

