



To: Angela Beecher, Warden
Grand Valley Institution for Women
1575 Homer Watson Blvd, Kitchener, ON, N2P 2C5

October 9th, 2025

CAEFS' August 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 September 3rd via Teams.

This letter summarizes reports we received and conditions we observed during our visit to the Grand Valley Institution on August 26th-28th 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,

Tise Ogunleye
Lead Advocate



Access to programs and timely security-level reviews for Indigenous People

Description: CAEFS received reports that six-month reviews for individuals in the pre-pathways programs are not being completed regularly. CAEFS also received reports that individuals in the maximum-security unit have limited access to programming, including one report of an individual waiting over eight months for a required program, thus delaying their security review. Given the disproportionate number of Indigenous people classified at maximum-security, this also disproportionately impacts them. People shared that delayed security level review and limited access to programming, results in longer periods at higher security levels, limits their access to their supports, impact parole success, and lead to longer periods of incarceration.

Discussion: The Institutional Management Team (IMT) shared that the cases of all individuals in pre-pathways are reviewed on a bi-weekly basis. They report that they have not been made aware of any delays, but also noted that they do not believe that anyone in the maximum-security unit is participating in pre-pathways. The IMT also shared that the majority of Indigenous ceremonies happen on the Main compound and that they are limited in the number of people from other security classifications who can attend, but that for major Indigenous events, they do facilitate individuals from the Minimum-Security Unit (MSU) and the secure level to participate. They also noted that the secure unit has recently received a fire pit, and they intend to increase the frequency of ceremonies happening there.

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

CD 710 s. 8: For Indigenous [people], a Security Classification Review (Security Reclassification Scale/Security Reclassification Scale for Women and Assessment for Decision) will be completed within thirty days of an [person's] successful completion of a main program (based on the final Program Report date) for [people] classified at maximum or medium security level. This review is not required for [people] serving a life sentence for first or second degree murder, or [a person] convicted of a terrorism offence punishable by life, who is currently classified as maximum security who has not had their first Security Classification Review, unless supported by the Case Management Team

CD710 s. 9: For Indigenous [people] participating in Pre-Pathways interventions/Pathways units, a Security Classification Review (Security Reclassification Scale/Security Reclassification Scale for Women and Assessment for Decision) will be initiated at least every six months and completed within thirty days of the Pathways Progress Review Meeting. This review is not required for [people] serving a life sentence for first or second degree murder, or [a person] convicted of a terrorism offence punishable by life, who is currently classified as maximum security who has not had their first Security Classification Review, unless supported by the Case Management Team.

CAEFS' Recommendation: In order for the Correctional Service Canada (CSC) to ensure it is using the least restrictive measures consistent with the protection of society, staff members, and [people in prison], security classification reviews should be conducted at the earliest opportunity. Supporting people to be moved to a lower security classification aligns with the principle of least restrictive measures and increases the likelihood of successful community reintegration, and dually reduces long term adverse mental health and physical health consequences that arise from prolonged placement in maximum



security units. Broad access to programs and services can be enhanced by increasing community engagement with people in the maximum-security unit, and by increasing institutional processes to allow maximum security placed people to enter medium security for program and activity purposes.

Access to Indigenous Culture and Ceremony

Description: CAEFS received reports that Indigenous people in both minimum and maximum-security units have limited access to ceremonies that are at GVI, which they identify as crucial to their wellness journeys. CAEFS also received reports that non-Indigenous people are being prevented from attending and participating in Indigenous ceremonies. Some Indigenous people reported that this does not reflect the inclusive cultural practices found in the community and found this exclusion to be upsetting.

Discussion: The IMT shared that, due to budget constraints, they are prioritizing Indigenous people for access to Indigenous supports and ceremonies, but that some non-Indigenous people are allowed to participate, provided they have long-standing relationships with Indigenous services and are active participants in programming.

Law & Policy:

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

CD 702 s.6(g) The Institutional Head will: promote and facilitate regular traditional ceremonies, including smudging with ceremonial medicines.

CAEFS' Recommendation: CSC must be responsive to the needs of incarcerated Indigenous persons, including their spiritual needs and access to ceremony. Given that over 50% of people incarcerated in federal prisons designated for women are Indigenous, meeting the needs of Indigenous people in custody must be a priority - along with continuing to work towards the decarceration of Indigenous people in Canada.

Access to post-secondary education

Description: CAEFS received reports that across all security levels, there has been a significant reduction in post-secondary education opportunities and bursaries at GVI. Individuals reported that they were informed by the principal that there was currently limited capacity and only a limited number of applications could be processed. People expressed that this impedes their ability to develop themselves vocationally and educationally while in prison, which is harmful both in the immediate and reduces their long-term opportunities. CAEFS also received reports that individuals in the minimum-security unit (MSU) could not access the "Walls to Bridges" program due to escort limitations and institutional rules preventing individuals from the minimum and maximum-security units from attending together. It was suggested to CAEFS by individuals in the MSU that introducing education-based releases, similar to work-releases, would support in facilitating access to post-secondary education.

Discussion: The IMT shared that the Education Department is not reporting a reduction in access to post-secondary education and shared examples of their enrolment numbers with CAEFS. However, the IMT also shared that intakes for newcomers are on hold due to the principal's leave. While Walls to Bridges is running on the main compound for the Fall,



Winter, and Spring semesters, the IMT shared that people in the MSU will only have access to the Fall and Spring semesters due to limited escorts.

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

CAEFS' Recommendations: CAEFS recommends that GVI increase opportunities for individuals to enrol in education programs, especially Walls to Bridges, but extending to all post-secondary access, in general. GVI is continually praised for its strong focus on post-secondary education, and this focus leads to excellent outcomes for individuals who participate in post-secondary education while incarcerated.

Inmate Committee Process

Description: CAEFS continued to receive reports from the Inmate Committee that the meeting minutes from their meetings with the Warden are only being shared only 10 days before the next meeting. The committee shared that this left them with limited time to prepare the agenda for the next meeting, review it with the Social Programs Officer, and submit it five days ahead of the next meeting, as required.

CAEFS also received reports that individuals in the minimum-security unit (MSU) are not permitted to vote in the Inmate Committee executive election. Individuals shared that they could only vote for the MSU representative and, therefore, did not feel represented in decisions on how Committee money is spent.

CAEFS also received reports that the Secretary Treasurer and Vice Chair of the Inmate Committee are no longer in their roles and have yet to be replaced.

Discussion: The IMT shared that they are unable to provide the minutes within 10 days following the meeting. The IMT shared that people in the MSU had previously stated their disinterest in voting for the executive positions, but would follow up on the reported concern. The IMT shared that an election is in progress, after some administrative delays.

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].



CCRA s 4(d) [federally sentenced 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: The Inmate Committee is a position designed to empower women and gender diverse people in prison and have meaningful impacts on institutional environments, and to ensure input into decision-making. Especially following CCRA section 74, CAEFS encourages GVI to work directly with the population and Inmate Committee to address and respond to gaps in the functionality of the Inmate Committee at GVI.

Reported Discrimination Based on Relationship Status / Sexual Orientation

Description: CAEFS received reports from couples at GVI that they are experiencing discrimination based on sexual orientation and relationship status, particularly regarding how decisions related to cohabitation are being made. One example of this includes an individual reporting being moved into a unit where her partner also lived, without prior request, then removed the next day and given a cohabitation memo, which outlines the institutional process and criteria for living with one's partner. She was later offered a return to the unit but had to remind staff of her relationship, after which the offer was rescinded. She and her partner report feeling under heightened scrutiny and targeted by "degrading" staff comments. Another individual reported being separated from living with her partner despite no issues, and felt the decision was based on staff discomfort with same-sex relationships. She recalls being told her relationship was "disrespectful" to staff.

Discussion: The IMT shared that they will follow up on these reports, as this was not previously known to them. The IMT affirmed that discrimination is unacceptable and encouraged the impacted individuals to speak to a Correctional Manager if they have concerns with how they are treated by the staff.

Law & Policy:

CCRA s 4(d) [federally sentenced 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.

Prohibited grounds of discrimination under section 3(1) of the Canadian Human Rights Act "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"

As a result of a 2019 case before the Canadian Human Rights Commission, the CSC communicated memos to all incarcerated populations that "the Correctional Service of Canada has no tolerance for discrimination with respect to inmate accommodation. Requests for house/cell moves will not be declined based on sexual orientation or relationship status. All requests will be considered based on the provisions outlined in Commissioner's Directive 550 – Inmate Accommodations"

CAEFS' Recommendations: Sexual orientation and relationship status are protected grounds in the Canadian human rights act, and discrimination must not occur either directly or through adverse differential impact. CAEFS appreciates the IMT's offer to follow up on these reports.



Access to Dignity and Empowerment: Reported Disciplinary Action Related to Dress code

Description: CAEFS received reports that people are being charged for not adhering to the prison dress code. People report that they are expected to dress appropriately in private settings and in extreme heat conditions. People share that they have been told that the dress code has been updated in the new handbook, but the new handbook has not been circulated.

Discussion:

The Institutional Management Team (IMT) shared that they have spoken to the inmate committee and informed them that the new handbook does not have changes to the dress code. They state that the handbook will be distributed soon, but it has minimal updates. The IMT shares that the dress code expectation is that they are in appropriate attire for themselves and others. They share that they have become aware of the charges, but they are infrequent and, to their knowledge, have not been upheld. The IMT shares that they are working through this issue with the staff and the inmates and are hopeful that things will be resolved.

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]

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

CAEFS' Recommendation: CAEFS encourages GVI to work alongside staff and inmates to resolve issues surrounding the dress code and to distribute the updated inmate handbook when possible, to avoid any further misunderstanding.

Access to Meaningful Employment

Description: CAEFS received reports of limited meaningful employment opportunities at GVI. This was specifically reported by the population in the minimum and maximum units. People share that the positions are often limited to cleaning roles, which do not align with post-release goals or contribute to their skill development. The minimum-security Unit (MSU) representatives developed a list of roles for consideration and are hopeful for more roles that align with their skillset and will submit it to the IMT.

Discussion: The IMT shared that they continue to experience a shortage of supervisors, limiting the number of new positions that can be created. They offered to speak with the program manager and look over the list once submitted.

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 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: CAEFS recommends that CSC increase opportunities for meaningful employment both within the penitentiary and through conditional release processes such as work releases. Employment is a key component of successful reintegration and is especially important for individuals held in maximum security, and in the women's sector, given the Creating Choices model

