

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

November 18th, 2025

Dear Lil,

I want to thank you and other members of the institutional management team (IMT) at the Edmonton Institution for Women (EIFW) for taking the time to meet with me on October 30th, in person at EIFW.

This letter summarizes reports received and conditions observed during our visit to the Edmonton Institution for Women from October 29th and 30th 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

Hinstead

Disciplinary Process: Reported Mandatory Fines and Penalties

Description: CAEFS has received reports that incarcerated individuals are being issued mandatory fines of \$25 per charge when found guilty in disciplinary court for being in a living unit other than their own. One individual reported receiving \$175 in fines during a single hearing. People at EIFW shared they were informed of this policy through a memo, which further stated that no informal resolutions or warnings would be offered in relation to this type of charge. A similar fine reportedly applies to passing items, though at a lower amount.

Given that the maximum daily pay is only \$6.95, people find these fines are extremely difficult to pay. Individuals shared that the financial burden limits their ability to put money on their PINS, reducing contact with family and community supports. Some reported relying on money sent by family to cover these fines. It was further noted by people incarcerated at EIFW that these fines do not appear to improve compliance with institutional rules and are experienced as punitive and harmful. Suggested alternatives from people at EIFW included creating more opportunities for sanctioned inter-house interaction to reduce unauthorized visits. Additionally, individuals reported that engaging in a three-way call results in an automatic 10-day suspension of phone access for all parties involved.

Discussion: The Institutional Management Team (IMT) stated they were unaware of any memo and confirmed that, if such a memo exists, it did not originate from senior management. They clarified that there is no automatic 10-day suspension of phone access for three-way calls; however, suspensions may be considered after repeated incidents or if a call raises security concerns. The IMT also noted that individuals have expressed concerns about people entering living units where they do not reside, and these concerns are being taken seriously.

Law & Policy:

CCRA s. 38: The purpose of the disciplinary system established by sections 40 to 44 and the regulations is to encourage [incarcerated people] to conduct themselves in a manner that promotes the good order of the penitentiary, through a process that contributes to [incarcerated peoples'] rehabilitation and successful reintegration into the community.

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.

CCRR s. 34(b): Before imposing a sanction described in section 44 of the Act, the person conducting a hearing of a disciplinary offence shall consider [...] the least restrictive measure that would be appropriate in the circumstances.

CAEFS' Recommendation: The disproportionate and extreme financial burden of these costly fines contravenes the purpose of the Correctional Service of Canada and of the disciplinary system, and represents a most restrictive practice. CAEFS recommends that EIFW remove all mandatory minimum disciplinary fines from policy and practice, ensure compliance with legislation, and prioritize informal resolution in all possible cases. Formal disciplinary measures should only be used as a last resort, given their significant and lasting impact on the liberty of federally sentenced women and gender-diverse people.

Impact of "Security Threat Group" Designation on Indigenous People

1-800-637-4606

Description: CAEFS has received reports that the criteria for being deemed "inactive" under the Security Threat Group (STG) designation are unclear to federally incarcerated individuals. Many describe the removal process as feeling "impossible," even when they are no longer involved.



Individuals at EIFW reported that associating with others often raises security concerns because so many people have STG designations. They expressed that it feels "impossible not to be seen as involved," noting that CCTV footage is frequently misinterpreted and that interactions between people from different groups are wrongly viewed as gangrelated.

It was shared with CAEFS that misidentifying someone as STG or continuing to list them as active when they are not can place individuals at serious risk. Those with STG tags reported being denied opportunities such as minimum-security status or healing lodge placements, leaving them unable to progress. One person asked, "How are we supposed to move forward?" In some cases, Elders' recommendations to mark someone as inactive were reportedly overridden by the Security Intelligence Office (SIO), which continued to classify them as active.

People feel that the SIO focuses only on negative information and influences parole officers to act unsupportively. This is experienced by people at EIFW as institutional discrimination against Indigenous Peoples. Relatedly, individuals reported that their Indigenous Social History is referenced in connection with gang involvement but not recognized as a mitigating factor in assessments.

Discussion: The IMT informed CAEFS of the criteria used by CSC to determine whether someone is considered active in a Security Threat Group (STG), referencing CD 568-3 and associated assessments. They clarified that having an STG designation does not automatically prevent classification as minimum security and that STG status tends to have less impact in penitentiary designed for women's institutions than in those for men's.

The IMT advised that individuals who believe they have been incorrectly labeled can submit a request to the Security Intelligence Officer (SIO) for assessment or reassessment. However, they noted a growing reluctance among individuals to meet with the SIO.

The IMT also shared that the community group *Str8t Up* is providing support to some individuals at EIFW, though these services are generally limited to people from Saskatchewan.

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. [emphasis added]

CCRA s. 79.1(1): In making decisions under this Act affecting an Indigenous [person], the Service shall take the following into consideration: (a) systemic and background factors affecting Indigenous peoples of Canada; (b) systemic and background factors that have contributed to the overrepresentation of Indigenous persons in the criminal justice system and that may have contributed to the [person's] involvement in the criminal justice system; and (c) the Indigenous culture and identity of the [person], including his or her family and adoption history.

Commissioner's Directive 568-3 s.16: When a recommendation is made to affiliate an [incarcerated person] with a security threat group, terminate the affiliation, or change the [incarcerated person's] role or status, the Security Intelligence Officer will meet with the [incarcerated person] to explain the recommendation. The Security Intelligence Officer will also share a copy of the Assessment sheet with the [incarcerated person] prior to the decision by the Institutional Head/District Director and give the [incarcerated person] an opportunity to respond to the recommendation in person or, if the [incarcerated person] prefers, in writing.

CAEFS' Recommendation: A meaningful consideration of Indigenous Social Histories by the Correctional Service of Canada (CSC) must include an understanding of gang involvement in the Prairie region as a response to social inequities rooted in colonization. CAEFS recommends that CSC examine how STG designations contribute to the overrepresentation of Indigenous women at higher security classifications. CSC should also strengthen and expand partnerships with external organizations that provide peer-led support for individuals seeking to disengage from gangs, to support their reintegrative mandate. Additionally, CSC should clearly communicate the requirements for becoming inactive to incarcerated individuals and make related assessment tools / criteria publicly accessible.

Hunger Strike, Physical Conditions of Confinement, and Discrimination

Description: CAEFS received reports that a group of individuals incarcerated at EIFW, primarily from one living unit, participated in two hunger strikes, each lasting about 20 days. After the strikes, the unit was dispersed, with some participants transferred to the Private Family Visiting unit and the maximum-security unit.

The first strike reportedly occurred from August to September 2025 following reports of significant water disruptions. Individuals reported having to use outhouses, living under a boil-water advisory for drinking, hygiene, and cooking, and being told to shower at their own risk. They shared that limited bottled water was provided, while tap water continued to be used for medication distribution. The second strike occurred in October 2025. Participants in the strike disclosed that they were asking for clean water and opposition to cultural rights violations, systemic discrimination, racial profiling, harassment, and cruel and unusual punishment. They stated that their reasons and relevant harassment policies were posted on the unit bulletin board but later removed by staff, reportedly for being a fire hazard.

Participants reported adverse consequences to engaging in the strikes. Institutional searches of living units followed the strikes. Individuals reported that the timing felt targeted and intimidating, and a notebook documenting conditions and staff interactions was seized. An authorized phone number was also removed from an incarcerated person's call list for recording and sharing strike-related calls on social media, deemed a policy violation. Another individual was reportedly transferred to maximum security and questioned about a related social media video.

Discussion: CAEFS and the IMT discussed reports of hunger strikes and the circumstances surrounding them. The IMT indicated they were aware of only one hunger strike and shared that health care staff conducted daily visits during that time. They suggested that some individuals may not have been actively participating in the strike. They outlined steps they say were taken to provide support, including connecting individuals with Elders, as well an Elder-facilitated staff training on the impacts of trauma.

The IMT encouraged individuals to raise concerns directly and use the request and grievance system, noting that some issues shared by CAEFS were new to them.

Regarding water access, the IMT reported two recent boil-water advisories—one specific to EIFW and another reportedly affecting the Edmonton area. They shared that water is tested weekly at the institution. The IMT noted that individuals were advised to store water before scheduled maintenance, and outhouses were temporarily used to mitigate biohazard risks during plumbing repairs. Showers were to be used at one's own risk during some of this period. They shared that bottled water was provided, including to Health Services. They also shared that notices were posted.

On the subject of the social media postings, the IMT stated that there were security breaches in the posts.

Law & Policy:

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

CCRA s. 4 (e): the Service facilitates the involvement of members of the public in matters relating to the operations of the Service;

CCRA s.71 (1): In order to promote relationships between inmates and the community, an inmate 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. 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.

CCRA 73 Inmates are entitled to reasonable opportunities to assemble peacefully and associate with other inmates within the penitentiary, subject to such reasonable limits as are prescribed for protecting the security of the penitentiary or the safety of persons.

Guideline 801: Hunger Strike: Managing an [Incarcerated Person's] Health, s. 1: Working in collaboration, staff must try to resolve the issue(s) identified by the [incarcerated person] as the reason(s) for declaring a hunger strike.

CAEFS' Recommendation: CAEFS recommends that EIFW ensure consistent access to clean water and safe sanitation. facilities, including during maintenance or boil-water advisories. We recommend dedicated investigation into reported systemic discrimination and cultural rights violations and solutions that engage both the incarcerated individuals at EIFW and the IMT in productive dialog. We emphasize that it is within federally incarcerated people's legal rights to hunger strike, and to share information about their conditions of confinement with the public. Adverse institutional responses to peaceful protest, such as hunger strikes, must be prohibited. Individuals should not face intimidation, higher security classification, or loss of community support for exercising their rights.

Access to Family: Private Family Visiting (PFV) and Phone Access

Description: CAEFS received reports that the Private Family Visit (PFV) unit continues to be used as a living space, currently housing six individuals. Those in the PFV reportedly have limited phone access, as they must use phones located in Ma Mawi, a common area in the main building, which are often unavailable or inaccessible. This has created ongoing communication barriers between individuals in the PFV and their families and communities.

The suspension of the Private Family Visiting Program at EIFW, which has been in place since 2018, continues to undermine meaningful connections and the right to reasonable contact. Incarcerated individuals suggested installing one or two "holiday trailers" within the penitentiary—between the main compound and the minimum-security unit—as a temporary measure to restore private family visits.

Discussion: The IMT stated that the PFV unit is considered "last-resort housing." They confirmed that construction of new PFVs is prioritized in EIFW's master building plan. As part of this plan, a new building with over 80 beds—similar in design to the minimum-security unit—will also be added. The IMT noted that using the phone in Ma Mawi is only a temporary solution.



Law & Policy:

CCRA s.71 (1): In order to promote relationships between [incarcerated persons] 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.

CD 085: Correspondence and telephone communication, section 18: Telephone communication is a part of the overall program of reintegration into the community, similar to visits and temporary absences.

CAEFS' Recommendation: Overcrowding in women's penitentiaries is undermining CSC's ability to fulfill its mandate and ensure meaningful family contact. Rather than expanding living units, CAEFS urges CSC to prioritize decarceration strategies to reduce population pressures. These strategies should include only suspending parole as a last resort and ensuring that people are being supported to appear in front of the Parole Board of Canada at their earliest possible dates. This approach is both better aligned with CSC's legislated purpose and principles, and more cost effective and expedient.

Access to Health Care: Changes to the National Formulary

Description: CAEFS received reports of upcoming changes to the Correctional Service of Canada's national formulary. Individuals at EIFW expressed concern about the removal of all opioid antagonist treatments except Sublocade, as well as the removal of Wellbutrin.

Regarding Sublocade, individuals reported that nurses lack adequate training to administer injections, resulting in pain. bruising, and discomfort. They also noted that previous opioid antagonist treatments were abruptly discontinued, causing distress and withdrawal symptoms.

With respect to Wellbutrin, individuals are concerned about losing access to a medication that has supported their mental health and well-being for years. They fear negative impacts from being transitioned to alternative medications. Many feel these decisions are driven by security concerns rather than by what is best for their health.

Even those not currently prescribed these medications expressed concern about the broader impact of reduced access, including potential withdrawal symptoms and mood instability in an already overcrowded penitentiary.

Discussion: CAEFS and the IMT discussed that decisions regarding the national formulary are made at the national level, not at individual sites. The IMT confirmed that no exceptions are currently permitted for the use of Wellbutrin. A representative from Health Services agreed to follow up with the nurses regarding Sublocade injections.

Law & Policy:

CCRA s.4(q): 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.

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.

CCRA s. 86(2): The provision of health care under subsection (1) shall conform to professionally accepted standards.

CAEFS' Recommendation: Given CSC's responsibility to provide safe and humane care for individuals in federal penitentiaries—where they rely on staff and contractors for health services—CSC must adopt additional measures to protect the dignity and well-being of those in its care. Access to appropriate, trauma-informed health care is essential, not only to meet community standards but also to support meaningful engagement in correctional plans and successful reintegration. CSC should avoid undermining physicians' and nurse practitioners' ability to prescribe the most effective treatment by prioritizing security concerns over clinical judgment in formulary decisions.

Access to Less Restrictive Environments: Timeframes for Reclassification and Transfers

Description: CAEFS has received reports that multiple individuals were told by their Parole Officers they must remain in maximum security for at least two years, regardless of progress or circumstances.

Additionally, individuals classified as medium security have reportedly been held in maximum security due to incompatibilities within the main compound. These individuals have not been offered opportunities to mediate or resolve these issues, limiting their ability to be placed at the appropriate security level.

Discussion: The IMT shared that individuals serving life sentences are typically not scheduled for review until two years after sentencing. However, they work to advance "suitable cases" for early review, which must be approved by the Assistant Commissioner of Operations and Programs (ACOP). The IMT encouraged individuals to submit requests for early review to the Assistant Warden of Interventions. They also shared that one person in maximum security has been unable to transfer to medium security due to incompatibility issues, and mediation is not possible in this case. Alternatives, including a transfer to another penitentiary, are being explored.

Law & Policy:

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

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

CCRA s. 3(b): The purpose of the federal correctional system is to contribute to the maintenance of a just, peaceful and safe society by assisting the rehabilitation of [people who are incarcerated] and their reintegration into the community as law-abiding citizens through the provision of programs in penitentiaries and in the community

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.