



Submission to ACT Human Rights Commission Human Rights Audit and Review of Treatment of Women at AMC

Women's Centre for Health Matters Inc.

and

ACT Women And Prisons Group

June 2013

The ACT Women And Prisons Group and the Women's Centre for Health Matters acknowledge the Ngunnawal people as the traditional owners and continuing custodians of the lands of the ACT, and we pay our respects to the Elders, families and ancestors.

We acknowledge that the effect of forced removal of Indigenous children from their families as well as past racist policies and actions continues today.

Women's Centre for Health Matters Inc. and ACT Women And Prisons Group, 2013.

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INTRODUCTION

The ACT Women And Prisons Group (WAP) is made up of women with lived experience of prison, including ex-prisoners and those currently detained in the criminal justice system, as well as ACT women's services and other interested women. WAP provides emotional and practical support both during and after incarceration, and advocates for the human rights of all women involved in the criminal justice system.

WAP's advocacy role is focussed on educating stakeholders about the needs of women with lived experience of the criminal justice system. WAP sees the criminal justice system as not just about Justice or Corrections, but as requiring a whole of Government approach.

WAP uses peer support as a vehicle to build relationships and trust with women and to identify service gaps within the system. WAP is guided by women with lived experience of prison and provides opportunities and support for these women to actively contribute to the Group's work.

The WOMEN'S CENTRE FOR HEALTH MATTERS Inc. (WCHM) is a community-based organisation that works in the ACT and surrounding region to improve women's health and wellbeing.

WCHM believes that health is determined not only by biological factors, but by a broad range of social, environmental and economic factors known as the 'social determinants of health'. WCHM acknowledges that the environment and life circumstances that each woman experiences have a direct impact on her health, and in many cases, women's poor health is rooted in social disadvantage. For these reasons, WCHM is committed to taking a whole-of-life and social approach to women's health that is also firmly situated within a human rights framework.

WCHM focuses on groups of women who experience disadvantage, social isolation and marginalisation (women with disabilities, institutionalised women, women living with mental health issues, women from culturally and linguistically diverse backgrounds (CALD), and older women) and uses social research, community development, advocacy and health promotion to:

- provide women with access to reliable and broad ranging health-related information which allows informed choices to be made about each woman's own health and wellbeing
- advocate to influence change in health-related services to ensure responsiveness to women's needs.

SUBMISSION

WCHM and WAP wish to acknowledge the work that has been done towards establishing the Alexander Maconochie Centre (AMC) as the first Australian prison built with a human rights framework in mind. As this submission will demonstrate there are many aspects of the prison that function well, and AMC and Corrections staff have generally been responsive to complaints or other issues that require attention.

However, WCHM and WAP believe that there are a number of areas of concern which will need to be addressed if AMC is to be truly 'human rights compliant'. Fundamental flaws in the design of the prison have meant that women constitute a tiny minority group within an environment in which most resources are allocated to the majority male inmate population. This has resulted in a serious lack of programs and educational or employment opportunities for women inmates, and some reports suggest that women have difficulties accessing the basic, essential services (including healthcare) that they need.

While few ACT women end up in the territory's criminal justice system, nationally the rate of women's incarceration is growing more rapidly than men's. As of 30 June 2010, there were 2200 adult women prisoners in Australia—an increase of 60 per cent over the past decade.¹ This is an emerging area of concern, with impacts on individuals, families, and communities more broadly. Moreover, incarcerated women are one of the most vulnerable groups of the ACT population. Research suggests that many of these women have backgrounds characterised by violence and trauma (some studies estimate that up to 89% of women in prison have experienced sexual assault),² and experience poorer outcomes in terms of mental health, substance misuse and social disadvantage than women in the community.³ Some statistics show that ACT women have the highest prior imprisonment rates in the country⁴—making it all the more important to ensure that the prison environment provides them with the support that they need to escape the cycle of recidivism.

This submission will highlight the range of issues for women incarcerated at AMC as perceived by WCHM and WAP. Many of these have been drawn to our attention through WAP's peer support visits with women incarcerated at AMC. The submission is laid out according to the list of high priority areas identified by the ACT Human Rights Commission as being fundamental to realising human rights.

¹ Australian Bureau of Statistics, 2010. *Prisoners in Australia* (Cat. No. 4517.0). Canberra: ABS.

² Debbie Kilroy, 2000. 'When Will They See the Real Us: Women in Prison'. Australian Institute of Criminology Conference.

³ Mary Stathopoulos, 2012. 'Addressing women's victimisation histories in custodial settings'. Australian Centre for the Study of Sexual Assault: <http://www.aifs.gov.au/acssa/pubs/issue/i13/i13d.html>

⁴ Australian Bureau of Statistics, 2012. *Prisoners in Australia* (Cat. No. 4517.0). Canberra: ABS.

Accommodation

WCHM and WAP acknowledge that the women's area cottage-style accommodation has proved suitable for its purpose. As far as we're aware, concerns about adequate heating have been addressed by AMC management with the installation of curtains in most cottages and the provision of warm doonas for women inmates.

Privacy

While there are adequate levels of privacy in the women detainees' accommodation units, WCHM and WAP are concerned to hear reports that there is a lack of space available in common areas which affords an acceptable level of privacy for women who need to have discussions about sensitive personal issues away from other inmates or staff—for instance, a room in which to meet with a counsellor, a legal representative, or a spiritual advisor. In the absence of such a space, WAP has spoken with women who claim that there have been occasions where staff have overheard confidential conversations and later used that information inappropriately.

WAP also continues to hear that despite the institution of an envelope system for submitting requests to visit the health centre, many women are still reluctant to use the 'bluey' forms (for any purpose) for fear that their personal details will be seen by staff or other inmates. Requesting a visit to the health centre directly from the nurse can also prove problematic given that for many women the only time this opportunity arises is in the presence of other detainees and staff, when the nurse visits the accommodation units to distribute medication.

Recommendation 1: That AMC ensures that there are adequate facilities for private conversations in common areas in the women's area.

Recommendation 2: That AMC continues to ensure that women detainees' privacy is respected when they use the 'bluey' system to make a request.

Recommendation 3: That AMC ensures that women are able to access health services (in particular) in a safe and discreet way.

Educational and vocational programs

Women's inability to access appropriate and ongoing educational or vocational programs at AMC has long been a concern for WCHM and WAP. From what we have been able to

gather, vocational programs have mainly focused on barista training and hairdressing (although the latter is no longer available), and educational programs—even basic literacy and numeracy—have been virtually non-existent. Women currently report being able to access the library for two hours on one day a week in what constitutes an unfacilitated, self-directed ‘learning session’; aside from that, we hear that there is a Monday cooking class and an art and craft group on Thursdays. There are no opportunities for women to pursue other kinds of qualifications that would assist them in securing employment or commencing further study once they exit.

While it has proven expensive to undertake programs for such a small number of women with a range of different needs and interests (particularly with the need for all sessions to be adequately staffed by prison guards), it is unacceptable that women detainees are unable to access the same quality and variety of educational and vocational opportunities at AMC that they would at any other Australian gaol.

Recommendation 4: That AMC urgently finds ways to ensure that women detainees have access to appropriate and ongoing educational or vocational programs.

Opportunities for sport and recreation

While there are some basic gym facilities in the women’s area and detainees are able to borrow tennis equipment, there are no scheduled sports or exercise activities available to women detained at AMC as far as WCHM and WAP are aware. Lack of supervisory staff is a barrier here, we understand—however, given the importance of physical exercise for health and wellbeing, it’s essential that AMC finds ways to facilitate and support access to exercise opportunities as much as possible.

Recommendation 5: That AMC implements scheduled sports or exercise activities for women detainees.

Opportunities for work

WCHM and WAP understand that there are limited job opportunities available for women detainees at AMC, mostly involving cleaning and barista work. Men detainees have opportunities to work in the kitchen and the laundry, and to undertake groundwork or assist with delivering education programs—no such opportunities exist for women detainees as far as we’re able to ascertain. There is also currently no day-release program that would allow

women detainees to pursue external work opportunities, for example at the end of a long sentence.

Recommendation 6: That AMC identifies and makes accessible a range of employment opportunities for women detainees, including investigating the possibility of a day-release program for detainees on long sentences.

Detainees' ability to observe their religion

From their peer support visits with women detainees, WAP understands that women at AMC are able to request a visit from either a Catholic or an Anglican chaplain; however, there are no scheduled spiritual services for women detainees and, as mentioned above, there is no private space available in the common areas for women to meet with a spiritual advisor. There seems to be a limited ability to meet the needs of women from other non-Christian religious backgrounds—WAP understands that Muslim women are able to request a matt and a copy of the Qur'an which they are able to use when worshipping in their own room. Aside from that, there are no other facilities set aside for the purposes of religious worship since plans to build a chapel were abandoned.

Recommendation 7: That AMC ensure that there are appropriate facilities to allow women detainees from any religious background to practise their religion.

Discipline

As far as WAP and WCHM are able to ascertain, disciplinary measures appear to be fair and reasonably consistent; these include the removal of privileges such as visits and buy-ups, or the implementation of a segregation order. Of some concern is the frequency of lock-downs (as reported in *The Canberra Times* earlier this year)⁵ which usually appear to happen when staff are unable to supervise detainees due to meetings, unplanned disruptions, or having to escort restricted detainees through common areas of the prison—however, WAP and WCHM understand that occasionally lockdowns are used as a disciplinary measure. Given the unacceptably high number of lockdowns called for other reasons, it is imperative that punitive lockdowns are kept to a minimum.

⁵ Christopher Knaus, 'Concern inmates' rights breached', *The Canberra Times*, May 27 2013: <http://www.canberratimes.com.au/act-news/concern-inmates-rights-breached-20130526-2n5mh.html>.

Recommendation 8: That AMC keep the number of lockdowns used as a disciplinary measure to a minimum.

Searches

The use of strip searches and other kinds of searches (including the ‘ramping’ of rooms) appear to be happening at acceptable and appropriate rates in the AMC women’s area. WCHM and WAP understands that women detainees are strip-searched only once upon admission—given the invasiveness of this procedure and the potential it has for re-traumatisation, it is encouraging to see that its use is being kept at a minimum.

Segregation and seclusion

WCHM and WAP are concerned that segregation/seclusion is sometimes used in problematic ways at AMC. Particularly worrying are reports that, in the absence of a policy on transgender detainees, incarcerated trans women have been kept in segregation; likewise, WAP and WCHM have heard that women suffering from serious mental health issues are occasionally isolated, along with women who are deemed unable to mingle with other detainees (such as those on protection orders or with a high level classification).

Keeping women detainees in isolation is a high-risk measure, particularly for those detainees who are already suffering with mental health issues; it should be a last resort and is never an appropriate long-term arrangement. WCHM and WAP understand that incidents of self-harm have previously occurred at AMC when women are placed in segregation—it is unacceptable for vulnerable detainees to be placed in a situation where they are isolated and without adequate support.

It is hoped that plans for a new adult forensic mental health unit will lead to more suitable accommodation and support arrangements for women detainees with mental health issues.

Recommendation 9: That AMC urgently develop and implement a policy for transgender detainees that outlines an appropriate, safe housing arrangement.

Recommendation 10: That AMC ensure that segregation/seclusion is only used as a last resort, especially for vulnerable detainees such as those with mental health issues.

Recommendation 11: That AMC ensure that those women who need to be housed in segregation/seclusion are provided with adequate support while they are isolated.

Classification

The design and lay-out of the Alexander Maconochie Centre is such that women of all security classifications—as well as those who are on remand and those who are sentenced—are housed in the same area. WCHM and WAP believe that this has proved highly problematic. To begin with, it has meant that women who have been assessed as having a high level security classification end up in segregation, as AMC is not resourced to accommodate them in any other way. Having sentenced and remand prisoners housed together is likewise inappropriate, given that women on remand have different security requirements and entitlements. The unwieldy variety of security classifications in the women's area has also proved a barrier to the implementation of a 'mothers and babies' program in the AMC, for which there has definitely been a need.

Given that the decision was made to house women at the AMC, it is imperative that Corrections and AMC find ways to ensure that housing women of multiple classifications together does not create problems with detainees' access to programs or other entitlements.

Recommendation 12: That, in the absence of any alternative accommodation arrangements, AMC and Corrections manage the housing of women of multiple classifications together in a way that does not limit detainees' access to programs or other entitlements.

Staffing

In the opinion of WAP and WCHM, staffing is currently one of the major issues at AMC. This is particularly the case in the women's area as staff resources tend to be chewed up by the men's area, where there are more stringent and urgent security requirements. Not having enough staff to supervise women detainees limits their access to programs, activities and other entitlements, and creates situations where lockdowns are a frequent occurrence. This has the potential to impact severely on women detainees' health/mental health and wellbeing, and may constitute a breach of their human rights.

It is encouraging to see that money has been set aside in the recent ACT 2013-14 Budget to be put towards enhancing staffing at AMC, and it is hoped that this will go some way towards addressing these concerns.

Recommendation 13: That AMC and Corrections, as a matter of urgency, address the staffing shortage at AMC.

Independent monitoring

According to information gathered during WAP's peer support visits, women detainees at AMC are not routinely seen by the Official Visitor and do not know who this position is currently held by or how to contact them. WCHM and WAP believe that this is very concerning.

It is not clear to WCHM and WAP whether there are other independent monitoring mechanisms which routinely visit AMC and which women detainees have access to, apart from the current ACT Human Rights Commission audit.

Recommendation 14: That AMC and Corrections urgently ensure that women detainees are visited on a regular basis by independent monitoring mechanisms such as the Official Visitor.

Recommendation 15: That AMC ensure that women detainees are aware of their rights with regard to speaking to independent monitoring mechanisms, and are able to contact them outside of official visits.

Freedom of information and communication

Women detainees have reported being unable to access policies and procedures through the AMC library, and have great difficulty accessing them through other means—WAP spoke to one woman who had apparently been waiting for months to read a policy she had requested a copy of. From what WAP and WCHM have been able to ascertain, most detainees are uninformed about what they are entitled to according to AMC policy, and even prison staff seem unaware of the details of policy and procedure.

Recommendation 16: That AMC ensures women detainees and prison staff have appropriate access to AMC policies and procedures.

Support for women to maintain relationships with families and dependent children

WCHM and WAP are concerned that women detainees are not provided with sufficient support to maintain relationships with families, partners, and dependent children while they are detained at AMC. Some detainees have reportedly found it very difficult to maintain contact with children, particularly as ACT Care and Protection Services do not seem to initiate or facilitate contact between the children in care and their detained parent; one woman WAP spoke to apparently went for months without any contact with her children. The absence of any kind of ‘mothers and babies’ program, or indeed any kind of program that supports parenting or enhances parenting skills for women, has been another barrier for detained women trying to maintain relationships with children.

Women detainees also report finding it difficult to maintain relationships with intimate partners, particularly when that partner is detained in the men’s area at AMC.

Women with family overseas face numerous barriers to staying in touch, especially as international phone calls are very expensive. Detainees report needing to work in order to have the money to pay for these phone calls, but given the lack of jobs accessible to women detainees at AMC this is not always possible. Email access at AMC also appears to be restricted, which again is particularly problematic for women with family overseas.

Recommendation 17: That AMC and Corrections work with ACT Care and Protection Services to develop procedures for facilitating contact between incarcerated mothers and their children.

Recommendation 18: That AMC investigate the possibility of instituting a parenting program for women detainees with dependent children.

Recommendation 19: That AMC create avenues for women to maintain phone and email contact with family overseas.

Treatment of pregnant women, breastfeeding mothers and provisions for women to have their children reside with them at the AMC

As already mentioned, there are currently no resources at AMC to enable women to have their children, even newborns, reside with them—the mixture of classification levels and the lack of facilities have meant that this is not possible. This has adversely affected a small number of women already since the establishment of the AMC. WAP and WCHM believe that this is an urgent issue that needs to be addressed in some way, whether through the

development of new facilities to house mothers and children or through another arrangement involving, for example, home detention for mothers with newborn babies.

The treatment of pregnant detainees at AMC appears to have improved in recent months; pregnant women detainees seem to be provided with adequate access to screening and check-ups, as well as nutritional supplements. However, there still seems to be no procedure in place for women who give birth while in custody—WCHM and WAP understand that decisions about how she will serve the rest of her sentence and whether or not she will be with her baby are left to the last minute, meaning a woman detainee goes into labour without any certainty about her own future or that of her child. This is an unacceptable scenario.

WAP has also heard reports that a woman detainee felt that she was pushed to continue her methadone treatment while pregnant. It is unclear whether this incident is being investigated.

Given the restrictions on having children at AMC, breast-feeding has been difficult to manage for women detainees who are nursing babies. One woman that WAP spoke to had to have her baby brought in to AMC to drink milk that she had expressed earlier; this was not an ideal arrangement by any means, and proved distressing for both mother and baby at a time in the child's development when they should have been bonding.

Recommendation 20: That AMC and Corrections, as a matter of urgency, seriously consider the implementation in some form of a 'mothers and babies' program at AMC, or develop an alternative arrangement that allows sentenced mothers to be with their young children.

Recommendation 21: That AMC develops protocols and procedures for women who give birth while in custody.

Personal hygiene for women prisoners

While WAP occasionally hears reports of women detainees who have had to wait (in some cases for months) for essentials like shampoo after being admitted to AMC, this currently appears to be less of a problem. Women detainees seem to have access to products and facilities that allow them to maintain an acceptable level of hygiene.

Appropriate healthcare for women, including mental health care, drug and alcohol services and reproductive health care

Accessible and appropriate healthcare at AMC is a great area of concern for WCHM and WAP. Women detainees continue to report facing multiple barriers to having their health and mental health needs met while incarcerated at AMC.

To begin with, there seem to be unacceptable delays involved in seeing any of the health professionals for women at AMC. Women detainees claim that it sometimes takes over two weeks to see a doctor about a health issue, still longer to get in to see any of the mental health professionals, and some women have reported waiting four months to see the dentist. This would not be acceptable in the community. These long waits also mean that preventative healthcare (such as screening, check-ups, and so on) is not something that women detainees are actively being encouraged to pursue, although it is available on request for women who are in the target age group. It is hoped that the money set aside in the ACT 2013-14 Budget for increased staffing at AMC will be used to better resource the health centre.

Women detainees at AMC are currently able to see a male mental health professional upon request (and usually after a wait). We know that many incarcerated women have backgrounds characterised by sexual violence and trauma—as such, WAP and WCHM strongly believe that detainees should have the option of visiting a female psychologist. Women detainees have also voiced this concern to WAP about the Intensive Care Unit, which is likewise staffed by men.

On any given day, a number of women detainees—if not the majority—have been incarcerated for crimes involving drugs. However, there is currently no scheduled, intensive, ongoing drug and alcohol program available to women detainees, and WAP has spoken to women who have had difficulty in accessing even basic information about drug and alcohol programs. Again, this is unacceptable, particularly as we understand that this is not the case for male detainees who have ongoing access to the Solaris Therapeutic Community program.

Given that research shows that many women in prison have poor health and mental health outcomes and have had limited contact with the healthcare system prior to imprisonment, time in detention should be seen as an opportunity to invite women into the system and provide them with the kind of care that will improve their health and wellbeing outcomes and decrease the risk of recidivism upon release. WAP and WCHM strongly believe that AMC

should be taking a more active role in addressing the health and mental health needs of the women detainees who are in the care of this institution.

Recommendation 22: That AMC urgently find ways to better resource the health centre in order to reduce unacceptable waiting times for women detainees.

Recommendation 23: That AMC provide women with the option of seeing a female mental health professional.

Recommendation 24: That AMC, as a matter of urgency, institute an ongoing, intensive drug and alcohol program for women detainees.

Recommendation 25: That AMC and Corrections play a more active role in addressing the health and mental health needs of women detainees, including promoting preventative health measures such as screening and regular health check-ups.

Transitional programs and support for women leaving the AMC

As far as WCHM and WAP are aware, there is no transitional release program available to women exiting AMC (although we understand that long-term detainees are entitled to access programs of this kind). Male detainees can take advantage of the transitional release cottage, but it is currently not available to women.

Upon release, women who have been incarcerated at AMC are able to access the Coming Home program which can provide them with a range of different supports, including housing. However, WCHM and WAP are greatly concerned that the Coming Home program is operated by three major ACT women's services that have all been seriously affected by the recent ACT Government funding cuts, and it remains unclear whether the program will continue to receive Government funding beyond the life of the current contract. Furthermore, the program has yet to be formally evaluated.

The ACT Government funded 'throughcare' pilot initiative is a promising and worthwhile endeavour, but it is hoped that the community services that are expected to provide wrap-around services through the initiative will be adequately resourced to cope with the new demand.

Recommendation 26: That AMC and Corrections investigate the possibility of implementing a transitional release program for long-term women detainees.

Recommendation 27: That ACT Government continues to fund the Coming Home program as the only extensive throughcare program currently available to women, pending evaluation.

Recommendation 28: That ACT Government ensures, as a matter of priority, that those community services (especially women's services) that are expected to assist with the implementation of the throughcare initiative are adequately funded and resourced to do so.

CONCLUSION

It's laudable that the Alexander Maconochie Centre was conceived with a human rights framework in mind, and there are a number of initiatives underway—including increased government funding for staffing and facilities—which look likely to have a positive impact on the lives of women detained at AMC. However, WCHM and WAP remain concerned that there are a number of aspects of current operations that do not sit comfortably within a rights framework. In particular, access to health and mental health services, arrangements for women with newborn babies, accommodation of transgender women, and the sheer lack of educational, vocational, and drug and alcohol programs for women are all especially worrying and require urgent attention.

WCHM and WAP are always mindful that incarcerated women are some of the most vulnerable members of the ACT community; they deserve to be given the opportunity to have a better life. It is greatly hoped that the ACT Human Rights Commission's audit will go some way towards achieving this.

RECOMMENDATIONS

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Recommendation 2: That AMC continues to ensure that women detainees' privacy is respected when they use the 'bluey' system to make a request.

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Recommendation 5: That AMC implements scheduled sports or exercise activities for women detainees.

Recommendation 6: That AMC identifies and makes accessible a range of employment opportunities for women detainees, including investigating the possibility of a day-release program for detainees on long sentences.

Recommendation 7: That AMC ensure that there are appropriate facilities to allow women detainees from any religious background to practise their religion.

Recommendation 8: That AMC keep the number of lockdowns used as a disciplinary measure to a minimum.

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