

Recommendation	Accept/Decline	Response	Systemic/Site
Operationalise the Hōkai Rangi Strategy.	Accept	<p>The Department of Corrections Ara Poutama Aotearoa is committed to achieving transformative and intergenerational change for the women we manage and their whānau.</p> <p>Hōkai Rangi is our overarching organisational strategy, and Wāhine – E rere ana ki te pae hou (Women’s Strategy 2021 – 2025) sets out how we will achieve these aspirations for women. The Strategy provides four focus areas which provide a guide to a way of working with women and their whānau. As well as this, the strategy has an action plan which sets out 64 actions to be achieved over the next four years (38 "Do Now", 26 "Do Later"). Five actions have been completed already, including developing a pregnancy healthcare pathway in conjunction with the College of Midwives and Nga Maia, and improving the menu for pregnant women in prison.</p> <p>Hōkai Rangi and the women’s strategy are being operationalised at ARWCF and across the women’s prison estate in various ways. Your visit coincided with a period where the organisation had been managing COVID-19 for some time and the impact of staffing shortages. Even outside of this context, examples of Hōkai Rangi in action at the site such as through staff interactions, are not always going to be obvious or measurable.</p> <p>As we continue to work and build on this strategy, we are looking at what more we need to do to support long-lasting change. Hōkai Rangi is an overall organisational strategy, rather than a site-specific initiative. As such, we will continue to provide updates on our progress in relation to the strategy all throughout our publicly available Annual Reports.</p>	Systemic

<p>Implement the agreed recommendations from Erin Judge's report"</p>	<p>Accept</p>	<p><i>Accuracy Comments</i></p> <p>The provisional report included comment that, <i>"The complaints process is generic and lacks impartial oversight."</i> The provisional report also only referenced the PC.01 General Prisoner Complaint process and noted that complaints are investigated by Corrections Officers. We have provided further detail about the existing system to address these comments.</p> <p>The Office of the Inspectorate provides formal independent oversight of the complaint system for people under Corrections <i>'control and supervision'</i>. The Inspectorate is operationally independent but is still part of the Department of Corrections. The Chief Inspector reports directly to the Chief Executive. This structure differs from the Office of the Ombudsman, Health & Disability Commissioner or Privacy Commissioner, which are external agencies. The formal oversight by Inspectors is outlined in the Corrections Act 2004 and Regulations 2005. For example:</p> <ul style="list-style-type: none"> - section 155 Persons under control may seek assistance from Inspector of Corrections to make a complaint - section 156 Investigation of complaints by Inspector of Corrections - section 157 Power of entry and access by Inspectors of Corrections - section 158 Reason for requesting interview with Inspectors of Corrections doesn't need to be disclosed. <p>In practice, people in prison regularly raise concerns about a prison site's handling of their complaints with the Inspectorate. The Inspectorate's Early Resolution Team (ERT) will work with the site and the prisoner to try and impartially resolve any issues promptly, so they do not need to be escalated (e.g., ensuring the site loads a complaint into the relevant database, ensuring the site gives the prisoner an update on progress). If a complaint has gone through the site-based complaint process, and the prisoner is unhappy with the site's resolution – the prisoner can then appeal to the Inspectorate. The Inspectorate will then determine whether they will complete a further investigation. Prisoners can also submit complaints direct to the Inspectorate if they are concerned about submitting them to the site. The Inspectorate will consider these complaints on a case-by-case basis.</p> <p>Primarily for privacy reasons, Corrections has three distinct documented processes for prisoner complaints:</p> <ul style="list-style-type: none"> - PC.01 General Prisoner Complaints - IR.07 allegations against staff - Health Feedback and Complaints <p>There are two separate prisoner complaint forms:</p> <ul style="list-style-type: none"> - PC.01 complaint forms where a prisoner can submit a general complaint or allegation against staff - Health Feedback, Complaints and Compliments forms where a prisoner can submit a health complaint. <p>Corrections Officers are not automatically allocated to investigate all complaints.</p> <p>In relation to health complaints, the Health Centre Manager (HCM) or delegate investigates the complaint. Corrections Officers do not investigate health complaints.</p> <p>In relation to allegations against staff, Residential Managers or those in more senior positions enter the details of the allegation into the database. The Prison Director determines the most appropriate person to investigate. Corrections Officers do not investigate these complaints.</p> <p>In relation to general complaints, Corrections Officers can attempt to resolve informal complaints. Once a complaint is formalised, a Principal Corrections Officer (PCO) or another assigned investigator can attempt to resolve the complaint at unit level within three working days. If it cannot be resolved in that time, the PCO must refer it to the "next level." The next level is not specified but would be the person the PCO believes is best placed to resolve the complaint. You can see more details of the PC.01 process here.</p> <p><i>Response to the Recommendation</i></p> <p>As you are aware, in 2021 Erin Judge completed an independent review of the Ara Poutama Aotearoa Complaint System with oversight from the Chief Inspector. The review was published on the Office of the Inspectorate website in February 2022.</p> <p>Our response to Erin Judge's recommendations will seek to address the women's concerns that the current system is, "lengthy and sometimes multiple PC01 forms are filled in before there is action". Accordingly, we accept this recommendation.</p> <p>Progress has already been made against, what will be, a multi-year work programme. Some initiatives were also already being developed before the report was finalised. Example of progress include:</p> <ul style="list-style-type: none"> • A new online complaint form has been implemented on Corrections website to enhance the ability for people in the community to better access the complaint system, including people who complain on behalf of women in prison. 	<p>Systemic</p>
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Develop a nation-wide training programme specifically for Corrections Officers who supervise the MBU.	Accept	<p>Corrections' Women's team and Learning and Development team are working on learning resources for frontline custodial staff working in the Mothers with Babies Units (MBU).</p> <p>The first of these resources is a 'leader-led conversation' covering some simple things staff can do to support the health, safety and wellbeing of mothers and babies, from now referred to as child/children. This is supported by a short video with some tips from an experienced staff member. Content was provided by frontline staff with expertise in the MBUs to ensure it would be relevant for staff needs. This went live in August 2022, and more resources are being developed.</p> <p>A longer-term piece of work across the women's network has begun to create a Learning and Development Pathway and Support Framework for custodial staff working in women's prisons. It is anticipated that the design and development of this pathway will be completed by June 2023, with implementation to occur following this.</p>	Systemic
Create a co-ordination role that has oversight for the care and protection of babies in the MBU and ensures their transition to the community is well supported.	Accept	<p>ARWCF is in the process of hiring a new Residential Manager (RM) based in the MBU, applications for this role closed on 28 October 2022 and an appointment is expected in early November 2022. From 24 October 2022, four Corrections Officers have also been assigned to the MBU rather than working on a roster that moves staff between different units. These changes will enable our staff to build on their knowledge and experience in this unit, create better opportunities to build relationships and rapport, and provide more consistency in support to the mothers.</p> <p>We have two Social Workers on site and the MBU Support Service who support mothers and their children to transition into the community.</p> <p>The Support Service is delivered at ARWCF by Te Hā Oranga o Ngāti Whātua. The support service provides parenting advice and support to mothers while they reside in the unit, as well as helping to plan their transition back home. Once mothers and children leave the unit the support service can provide ongoing support for up to 12 months in the community and/or make referrals to other community-based support services.</p> <p>Social Worker practice guidance states that when supporting mothers with their children in prison they will:</p> <ul style="list-style-type: none"> • Work with the external agencies already engaged in the MBUs to support the services being provided to the mothers. This will be done through checking that appropriate parenting, care plans and transition plans, are place for the babies in the units. • support mothers to successfully parent their children outside the parenting programmes they attend, including by identifying gaps in their knowledge and providing information and support to address those gaps. • arrange and facilitate child development opportunities and activities in the community. • check all the necessary and safe equipment that is required is provided. 	Systemic

<p>Review policy which dictates that babies cannot be treated by on-site health professionals.</p>	<p>Accept</p>	<p>We are prepared to review our policy and expect to have done so by April 2023.</p> <p>It is essential that mothers in the MBU are supported to enrol their babies with a community health provider, such as a GP Practice, at birth or soon after. The Lead Maternity Carer (LMC) can facilitate this enrolment as part of the support they give to mothers and babies until 6 weeks postnatal.</p> <p>As our system is presently configured, registering a baby to receive care in prison would create a link in their health records to the prison, which is not in the babies' best interests.</p> <p>Our present position is that community health providers are the appropriate place for a baby's care. These providers can deliver Well Child Health services, childhood immunisation, assessment, treatment for acute childhood illness, referrals to specialist services and a range of help and advice for mothers.</p> <p>Providing mothers with experience of managing appointments and going to a community health provider such as GP Practice, has value. It helps to establish the importance of using a community health provider and sets the mother and child up for ongoing care in the community. In the broader health system, it is recognised that not enrolling babies at birth leads to poorer outcomes and delayed vaccinations. Enrolling with a community health provider means the mother and baby will be linked to the recall system that ensures important screening activities and immunisations are completed. Having connection with local community health providers may mean that babies and their mothers have access to a broader range of allied health professionals than what may be available in a prison.</p> <p>For emergency situations, our health staff can and will provide care. The clinical emergency bag carried by the health staff attending any emergency contains some equipment to provide emergency care to babies and infants.</p> <p>All registered nurses with a current practising certificate have completed paediatric training as a core component of their nursing degree. All registered nurses undertake CPR training which includes emergency response for paediatrics.</p>	<p>Systemic</p>
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Recommendation	Accept/Decline	Response	Systemic/Site
<p>Provide appropriate supervision including cultural supervision for both custodial and social worker staff in the MBU.</p>	<p>Partially accept</p>	<p>We partially accept this recommendation to, <i>"provide appropriate supervision including cultural supervision for all staff in the MBU"</i>.</p> <p>I am pleased to advise that ARWCF has a dedicated Pou Tuhono role at the site who will provide cultural support to all staff in working in the MBU.</p> <p>Registered social workers also already receive regular external professional supervision.</p> <p>Corrections agrees to explore options to provide additional supervision for staff in the MBU, including considering cultural supervision. However, in order to confirm this approach, we would need to conduct further analysis and significant consultation with affected parties. This level of internal engagement has not been possible in the time provided for feedback on the provisional report. As such, we partially accept this recommendation at this stage.</p>	<p>Site</p>
<p>Open the baby bonding area to allow face to face bonding for mothers and their babies from the MBU with community-based whanau.</p>	<p>Accept</p>	<p>The Baby Bonding area is an extension of the visits centre and was therefore closed during COVID-19 restrictions.</p> <p>Since the inspection, the baby bonding area has been undergone renovations and reopened. The area has been painted and new furniture provided. New kitchen equipment, including bottle warmer machines have been also purchased for use in this area.</p> <p>ARWCF is now open for in- person visits. Our staff have been working incredibly hard to resume visits and activities at these sites as quickly as possible, while making sure they can continue to keep staff, people in prison and any visitors safe.</p> <p>As such, we accept this recommendation and consider it complete as at 4 November 2022.</p>	<p>Site</p>
<p>Develop and implement a strategy that safely allows volunteers to mind babies in the MBU.</p>	<p>Accept</p>	<p>Prior to August 2021, volunteers were providing babysitting services from Monday to Thursday 9am-12.30pm, with the Support Service taking over in the afternoon. When the country was placed under COVID-19 restrictions in 2021, the prisons operated under the Custodial Environments Operating Procedures (CCEOP). During this time, measures to prevent and contain COVID-19 in prisons meant some services were not able to enter the site.</p> <p>In March 2022, while ARWCF was operating under the CCEOP model, approval to have volunteer baby minders return to site was sought and received.</p> <p>Unfortunately, as many of our volunteers are older and in the 'vulnerable' health category, they were understandably not immediately comfortable to return to site due to risks posed by COVID-19, however, these services resumed at ARWCF in September 2022</p>	<p>Site</p>

Further to the above table, there were other points raised in your report that we would like to provide further information on.

- During the COVID-19 restrictions, the MBU was considered a separation unit to provide extra protection to the mothers and children in the unit. The women can now access all the areas previous available to them - they can walk around the self-care area and up to the horticulture garden with their child/children.
- A review of essential services for access to the site was reviewed in June 2022 and Plunket was granted access as a result.
- Plunket resumed their visit to the MBU in late June 2022. A Plunket Nurse and Health Worker visit site every second Tuesday. Both ARWCF and Plunket are working collaboratively to ensure that this remains consistent and the option of enabling visits via video link should the need arise.
- Following the comments in the report, the Plunket and Healthline 0800 numbers have been approved to be added to the telephone system.
- Maintenance work on the MBU is progressing and an audit has been developed to ensure the unit remains fit for purpose. Approval has also been given to turn one of the bedrooms into a play area for the children which will create a safe place for the children to play whilst the mothers are engaged in other household activities.
- Since August 2022 new age appropriate toys have been purchased. There have also been new cots, tables, chairs, washing machine and clothes dryer purchased for the MBU villas.
- In addition to the rehabilitation programmes that are available to the women housed in the MBU, there are also approximately 10 other educational and vocational programmes. These include Mainly Music (for both mothers and children), Arts to go, Foundation Skills and Dress for Success and Kapahaka.