



# CORRECTIONAL SERVICE CANADA

CHANGING LIVES. PROTECTING CANADIANS.



## Joint Audit and Evaluation of Structured Intervention Units

June 8, 2025

Internal Audit and Evaluation Sector





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# Acronyms and Abbreviations

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| <ul style="list-style-type: none"><li>▪ <b>A4D:</b> Assessment for Decision</li><li>▪ <b>ADCCO:</b> Assistant Deputy Commissioner, Correctional Operations</li><li>▪ <b>AWI:</b> Assistant Warden, Interventions</li><li>▪ <b>AWO:</b> Assistant Warden, Operations</li><li>▪ <b>BSC:</b> Behavioural Skills Coach</li><li>▪ <b>CCRA:</b> <i>Corrections and Conditional Release Act</i></li><li>▪ <b>CCRR:</b> Corrections and Conditional Release Regulations</li><li>▪ <b>CD:</b> Commissioner's Directive</li><li>▪ <b>CM:</b> Correctional Manager</li><li>▪ <b>CPO:</b> Correctional Programs Officer</li><li>▪ <b>CPU:</b> Correctional Plan Update</li><li>▪ <b>CO:</b> Correctional Officer</li><li>▪ <b>DBT:</b> Dialectical Behaviour Therapy</li><li>▪ <b>DW:</b> Deputy Warden</li><li>▪ <b>EMRS:</b> Electronic Medical Record System</li><li>▪ <b>FY:</b> Fiscal Year</li><li>▪ <b>GBA Plus:</b> Gender-based Analysis Plus</li></ul> | <ul style="list-style-type: none"><li>▪ <b>HARS:</b> Health Accreditation Reporting System</li><li>▪ <b>HRMS:</b> Human Resource Management System</li><li>▪ <b>IAES:</b> Internal Audit and Evaluation Sector</li><li>▪ <b>IEDM:</b> Independent External Decision Maker</li><li>▪ <b>IH:</b> Institutional Head</li><li>▪ <b>IIS:</b> Intensive Interventions Strategy</li><li>▪ <b>ILO:</b> Indigenous Liaison Officer</li><li>▪ <b>ISH:</b> Indigenous Social History</li><li>▪ <b>LTE-SIU:</b> Long-Term Evolution-Structured Intervention Unit</li><li>▪ <b>MHNS:</b> Mental Health Needs Scale</li><li>▪ <b>MM-SIU:</b> Motivational Module - Structured Intervention Unit</li><li>▪ <b>MM-SIU-I:</b> Motivational Module - Structured Intervention Unit – Indigenous</li><li>▪ <b>NHQ:</b> National Headquarters</li><li>▪ <b>O&amp;M:</b> Operations and Maintenance</li><li>▪ <b>OMS:</b> Offender Management System</li></ul> | <ul style="list-style-type: none"><li>▪ <b>PD:</b> Performance Direct</li><li>▪ <b>PO:</b> Parole Officer</li><li>▪ <b>PPA:</b> Personal Portable Alarm</li><li>▪ <b>RBAEP:</b> Risk-based Audit and Evaluation Plan</li><li>▪ <b>RHQ:</b> Regional Headquarters</li><li>▪ <b>RM:</b> Restricted Movement</li><li>▪ <b>RSPO:</b> Regional Senior Project Officer</li><li>▪ <b>SDS:</b> Scheduling and Deployment System</li><li>▪ <b>SIU:</b> Structured Intervention Unit</li><li>▪ <b>SIU-CIB/IDT:</b> Structured Intervention Unit Correctional Intervention Board/Interdisciplinary Team</li><li>▪ <b>SIU-CPU:</b> Structured Intervention Unit - Correctional Plan Update</li><li>▪ <b>SIURC:</b> Structured Intervention Unit Review Committee</li><li>▪ <b>SPO:</b> Social Programs Officer</li><li>▪ <b>TRA:</b> Threat Risk Assessment</li><li>▪ <b>WHMIS:</b> Workplace Hazardous Materials Information System</li></ul> |
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# Background

# About the Joint Audit and Evaluation

## Objectives

The Joint Audit and Evaluation of Structured Intervention Units (SIUs) was conducted as part of Correctional Service of Canada's (CSC) 2022-2027 Risk-based Audit and Evaluation Plan (RBAEP).

This engagement built upon CSC's Internal Audit and Evaluation Sector (IAES) review of the SIU implementation (2019) as well as the SIU Audit Readiness Engagement (2022).

Key areas were selected for exploration.

- **Compliance:** provide assurance that CSC is complying with relevant legislation and policies related to SIUs.
- **Effectiveness/Performance:** assess the achievement of expected outcomes and Gender-based Analysis Plus (GBA Plus) differences.
- **Efficiency:** assess the efficiency of the SIU model.
- **Management Framework:** provide assurance that a management framework is in place to support SIUs.
- **Relevance:** assess the continued need for SIUs and alignment with departmental and federal government priorities and responsibilities.

## Scope and approach

Evidence was collected at nine men's institutions and five women's institutions using a mixed-methods approach.

- **Interviews** were conducted with over 240 participants from May 2023 to November 2023, which included staff at the national, regional, and institutional levels, as well as inmates.
- **Observation** of various SIU processes and procedures were conducted by the engagement team for over 70 hours throughout multiple points of the day and evening across the institutions visited between May 2023 and July 2023.
- **Document and literature review** of scholarly articles, internal and external reports, and other documents.
- **Administrative data analysis** covering the period from April 2016 to April 2024 from internal databases, including:
  - Electronic Medical Record System (EMRS);
  - Health Accreditation Reporting System (HARS);
  - Human Resource Management System (HRMS);
  - Offender Management System (OMS);
  - Performance Direct (PD);
  - Scheduling and Deployment System (SDS); and
  - Long-Term Evolution-Structured Intervention Unit (LTE-SIU).
- **File review and testing** of over 1,400 inmate-related files and data records covering the period from October 2021 to November 2023.

It is acknowledged that the COVID-19 global pandemic had a significant impact on the operations of CSC. It is understood that certain aspects of the implementation and operation of the SIUs during the scope period of the joint audit and evaluation may have been affected.

## About Structured Intervention Units

The SIUs were introduced by Bill C-83 – *An Act to amend the Corrections and Conditional Release Act* (CCRA)<sup>1</sup>, that received Royal Assent on June 21, 2019. The purpose of the bill was to strengthen the federal correctional system. This included the elimination of administrative and disciplinary segregation and the establishment of the SIU correctional model.

There are 15 SIUs across all regions of the country. They are located within 10 men's institutions and five women's institutions.

Legislative and policy requirements guide the operationalization of SIUs and the management of inmates in SIUs. Key legislative requirements for the SIUs are included within sections of the CCRA and the *Corrections and Conditional Release Regulations* (CCRR).

CSC also developed SIU policy instruments, such as Commissioner's Directive (CD) 711 and its associated guidelines.

Pursuant to CCRA section 34(1) and CD 711, a staff member may authorize the transfer of an inmate into an SIU if the staff member is satisfied that there is no reasonable alternative to the inmate's confinement in an SIU and the staff member believes on reasonable grounds that the inmate has acted, has attempted to act or intends to act in a manner that jeopardizes the safety of any person or the security of a penitentiary and allowing the inmate to be in the mainstream inmate population would jeopardize the safety of any person or the security of the penitentiary, the inmate's safety, or would interfere with an investigation.



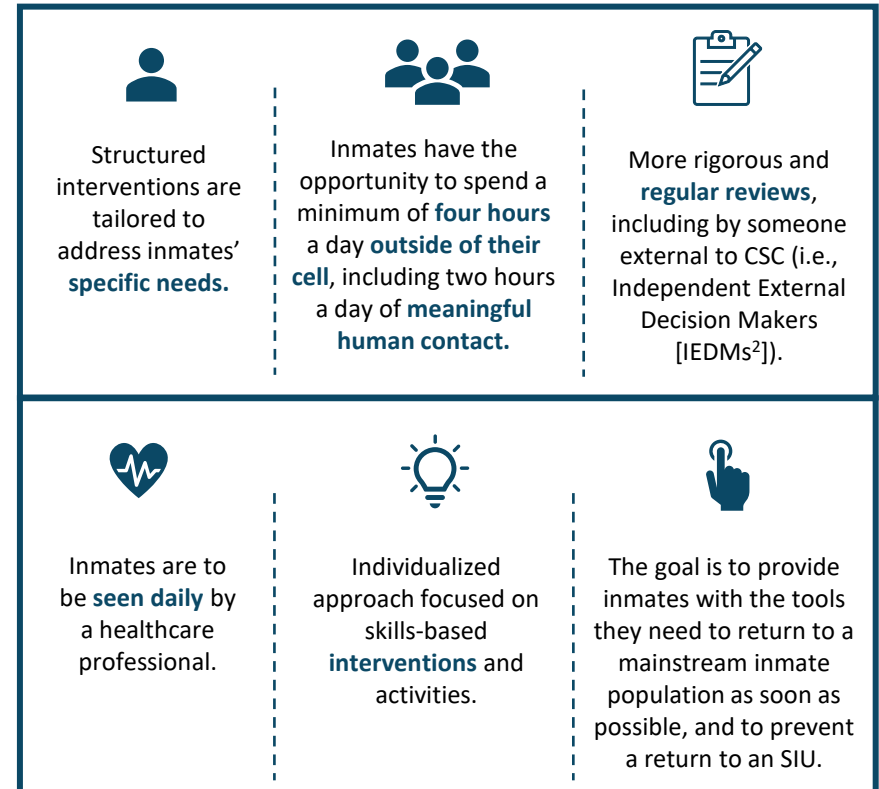
The LTE-SIU application was developed to support the management of inmates in SIUs. The tool records the interventions and activities offered to inmates. It also records additional information regarding the interactions that are taking place.

A full list of institutions with an SIU can be found in **Appendix F**.

Additional details about the SIUs regulatory framework can be found in **Appendix G**.

<sup>1</sup> Bill C-83: *An Act to amend the Corrections and Conditional Release Act and another Act* ([justice.gc.ca](https://www.justice.gc.ca))

In alignment with CCRA and CD 711 requirements, an infographic available on CSC's intranet provides an overview, as outlined below, of how SIUs differ from segregation.



<sup>2</sup> IEDMs are appointed by the Minister of Public Safety, Democratic Institutions, and Intergovernmental Affairs to review the cases of inmates confined in an SIU, pursuant to conditions and timeframes identified in the CCRA and CCRR.



# SIU Model and Framework



# Examples of Staff Perceptions about the SIU

Staff perceive and experience the SIU environment in different ways due to various reasons and factors.

Staff expressed the following sentiments about their experiences in the SIU:

## Vision and Objectives

"We push them to transfer too quickly. Inmates are hot potatoes - get them out fast. [We should] take the time with inmates to work with them... but we don't take the time and we're more concerned about the two [hours of interaction with others] and four [hours of time out of cell]."

## Policy

"[It is] Clear to me but know some line staff struggle with wordiness of policies. SIU policy is long winded when compared to other policies. It's hard for COs [correctional officers] to find simple answers in policy."

"The SIU policy doesn't account for offenders that do not want to engage."

## Multidisciplinary Approach

"Our site is good at the interdisciplinary team. We share a lot of info. People have said we really work well together here. The SIURC [SIU Review Committee] has a lot of staff come in, everyone is involved."

## Human Resources

"Some folks struggle with the type of inmates here. You deal with a lot and can experience burnout."

"No extra incentive to work in the SIU. The workload is way more compared to any other post."

## Transfer Authorizations

"There is a lot of pressure not to transfer inmates to the SIU."

## Effectiveness of Programming, Interventions, Services and Leisure

"There are some offenders that just can't get along with anybody (staff and inmates) and cycle through institutions. Those who just want solitary confinement. Gang members who have burned their bridges everywhere. We take our turns with these inmates. They are the real seg[regation] guys."

"The inmates live well in the SIU. They like it here... We can't get them out."

"Program not actually designed to address what's going on. Doesn't talk about when you're the victim... Also, the program is not designed for people who don't want to go out with anyone. Have to do the program the way it's designed but model doesn't work for everyone."

"It's hard for staff to understand as they get more services than gen[eral] pop[ulation]. Think we privilege this little group at the detriment of gen pop... It's hard to access interventions, but SIU has daily access. Warden visits every day. There's an imbalance."

## Measuring Performance

"Say we have a guy who historically was in seg for years and got them to mainstream population and lasted 2 weeks, that's a success, then maybe next time they last 3 weeks. Anytime [we're] assisting [the] offender to get to better place, think it's a success."

# Examples of Inmate Perceptions about the SIU

Inmates perceive and experience the SIU environment in different ways due to various reasons and factors.

SIU inmates expressed the following sentiments about their experiences in the SIU:

## Safety and Security

"It's prison, you don't know until you get there. Security and safety is always a risk."

## Infrastructure

"This place should not be an SIU. The infrastructure needs to be changed. It has old bones and they threw lipstick on it."

## Conditions of Confinement

"Wish seg still existed, more than happy to be left alone. Enjoy being by myself, I'm not a people person. I want peace and quiet. We weren't pushed back then like today to get out."

## Transfer out of the SIU

"I wanted to leave the SIU by choice through getting my medium security. I didn't want to transfer out to another region."

"[I have] concerns for my safety in gen pop."

## Effectiveness of Programming, Interventions, Services and Leisure

"It would be more beneficial if we could continue to follow our correctional plan in the SIU. Can't have someone come in and complete a [mainstream] program. SIU is dead time and not working towards correctional plan other than school. It delays me from progressing."

"There are pros and cons to both... Seg is not better for services, no one could argue there's more services in the SIU. But for a set routine seg was different... Seg had a set routine as opposed to the SIU. Get what you get whenever they want to give it to you."

"Before I accepted more, now I refuse. It doesn't help you reintegrate now. It doesn't address the issue; it doesn't lower your security level."

"They're good here, they ask often... Just to hear offers are nice, they ask often over the day."

"There's no difference in segregation and SIU, but at least here you can get out in groups."

"The difference in the SIU is that you get out of cell a lot more. You can't compare women's and men's SIU, in men's there's so many offenders but it can be very lonely in women's."

# SIU Inmate Profile

## Length of stay

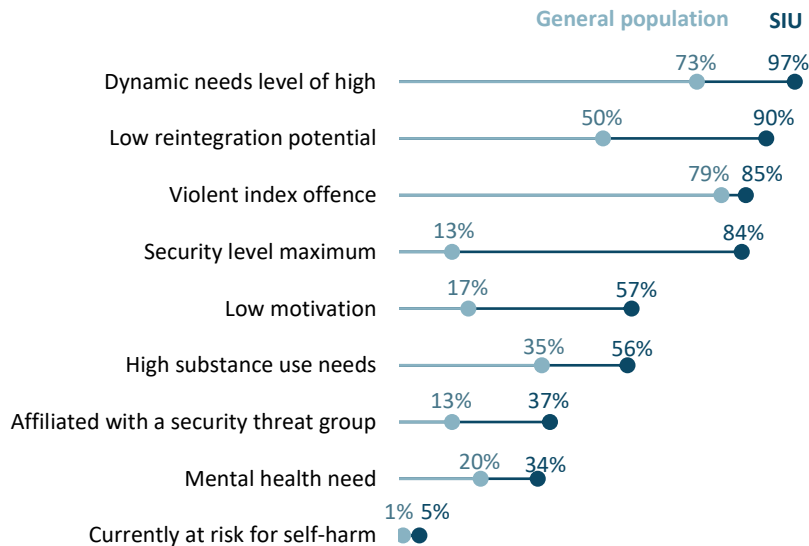
For the SIU population at large, the median number of days spent in an SIU was 21.

- Administrative data from April 2020 to March 2023 revealed that:
  - the median number of days spent was higher for Indigenous inmates (26 days) and lower for women (6 days); and
  - inmates who had a previously identified mental health need spent slightly more time in the SIU than those who did not.

## Comparison with general population

Compared to the general population, inmates in the SIUs more frequently had complex needs and risks.

Percentage of inmates with complex needs and risks:  
year-end snapshots from April 2020 to March 2023

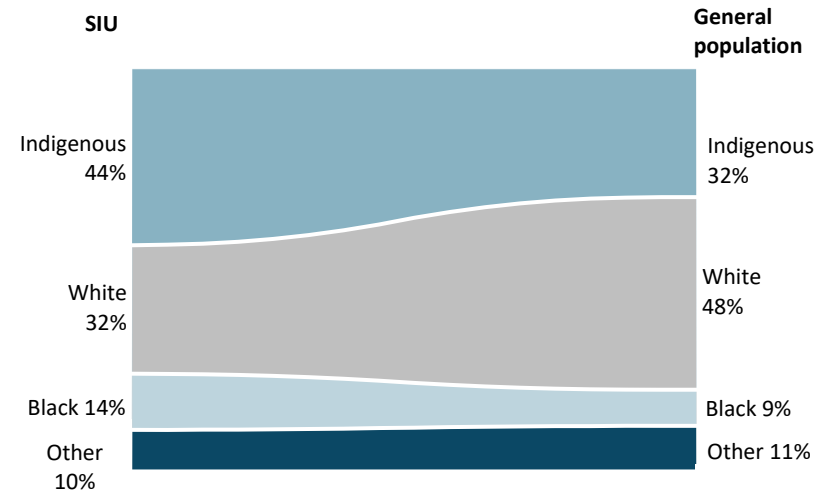


## Demographic characteristics

The SIU population is more likely to be men, younger, Indigenous, or Black.

- A year-end snapshot analysis comprising of multiple years (April 2020 to March 2023) revealed that 1% of all inmates were transferred at least once to an SIU. Of those:
  - 98% were men (versus 95% in the general population);
  - 95% were under 50 years old (versus 74% in the general population); and
  - 22.5% were visible minorities (versus 17% in the general population).
- Black and Indigenous inmates were overrepresented.

Race distribution in the SIUs vs. general population:  
year-end snapshots from April 2020 to March 2023



- Indigenous women were overrepresented in the SIUs (86%, 6 out of 7) versus in the general population (47%, 861 out of 1,844).

# SIU Vision and Objectives

The general vision, objectives and expectations for SIUs have been identified through various mechanisms and align with federal and corporate priorities. Although institutional management considered that a clear vision and objectives for the SIUs had been established or in part established, it was found that the vision and objectives were contradictory and may not be attainable due to operational realities.

## Identifying and communicating the vision and objectives

- The general vision, objectives and expectations for SIUs are identified in:
  - legislation, regulations, and various CSC policy instruments (CDs, guidelines, memos, interim policy bulletins); and
  - monitoring mechanisms such as national dashboards and performance indicators.
- The vision and objectives for the SIUs were further communicated through staff training when SIUs were first established and top-down messaging.
  - This has contributed to a common understanding of the vision, objectives, priorities, and envisioned outcomes for the SIU.
- SIU objectives are aligned with CSC's mandate, policies, and corporate priorities, and lessons learned from the previous segregation model.
- SIU objectives further complement broader federal priorities of public safety and humane treatment.

## Implementing the vision and objectives

- While institutional management generally perceived the vision and objectives for SIUs as clear, operational realities and experiences suggest that clarity diminishes in practice.
- Challenges with operationalizing the SIU vision and objectives are due to the contradiction between providing programming, interventions, and services that respond to an inmate's specific needs and risks and the expectation that inmates be transferred out of the SIU as soon as possible. Staff indicated that the focus is more on transferring inmates out of the SIU at the earliest opportunity instead of ensuring an effective correctional planning process that responds to an inmate's specific needs.
- As a result, inmates are not always getting the programming, interventions, and services they need before being transferred out of the SIU, which does not support CSC's mandate, strategic priorities, and the intended vision and objectives for SIUs.

### SIU Vision and Objectives

As per CCRA section 32, "The SIUs were designed to provide an appropriate living environment for an inmate who cannot be maintained in the mainstream population for security or other reasons; and provide the inmate with opportunities for meaningful human contact and participation in programs, and to have access to services that respond to the inmate's specific needs and risks."

As per CCRA section 33, "An inmate's confinement in a structured intervention unit is to end as soon as possible."

#### CSC's Mandate

Contribute to public safety by actively encouraging and assisting offenders to become law-abiding citizens, while exercising reasonable, safe, secure and humane control.

#### CSC's Corporate Priorities

- Safe management and supervision of offenders during their transition from the institution to the community.
- Safety and security of the public, victims, staff and offenders in institutions and the community.
- Effective, culturally appropriate interventions and reintegration support for First Nations, Métis and Inuit offenders.
- Effective and timely interventions in addressing mental health needs of offenders.
- Efficient and effective management practices that reflect values-based leadership in a changing environment.
- Productive relationships with diverse partners, stakeholders, victims' groups, and others involved in support of public safety.

# Policy

## Policy development

**The SIU policy was developed and promulgated before all operational realities of the SIUs could be understood. In the interim, guidance was disseminated and made accessible through various methods. This created challenges in ensuring that all staff were referring to the most up-to-date requirements and guidance.**

- When the SIU policy was first introduced it was based on a theoretical model which had not been operationally tested.
- The current policy was promulgated in November 2019 and, apart from interim policy bulletins and memorandums, has not been updated since the inception of the SIU. The SIU policy suite is currently under review and is expected to be updated by Spring 2025.
- Additional guidance was created (memos, interim policy bulletins, email communications, etc.) to support the operations of the SIUs (e.g., clarification of roles and responsibilities and specification of some operational requirements).
- However, not all SIU policy instruments were found in one easy to navigate repository. CSC's intranet, "the Hub", contained some of the revised guidance but not all information was on the same webpage.
  - Staff expressed that this has created issues when applying policy and guidance. Some documentation superseded previous guidance but there was no indication in the previous documentation that new guidance had been issued. As a result, policy and associated guidance may not be applied as intended.

“ There is a lot of policy around the SIUs. The SIU is complex, but this is still too much policy. A lot of the policy is driven by emails and word of mouth. It's changing and evolving. People struggle to follow it because there is so much.

– Staff

## Clarity of policy

**SIU policy instruments include areas that are unclear or where gaps exist.**

- Document review and interview responses from management and staff identified the following examples of areas which are unclear or where gaps exist within SIU policy instruments:
  - the role of health care and mental health within the SIU (e.g., with respect to health care assessments, medication delivery, open door policy for daily health care visits);
  - terminology used (e.g., “authorized” versus “approved”, “working day” versus “calendar day”);
  - addressing the needs of complex inmates (including those who refuse to transfer out of the SIU);
  - SIU infrastructure requirements;
  - the scope of activities and interventions provided in the SIU;
  - what constitutes conditions of confinement; and
  - what is considered a meaningful interaction.
- Gaps or lack of clarity in SIU policy instruments have resulted in lack of awareness and oversight, which have resulted in non-compliance with associated legal requirements, such as: meeting the requirements for time out of cell and interaction with others, meeting health care requirements, meeting institutional requirements, and ensuring an inmate's transfer to an SIU is for the shortest time possible.
- SIU policy instruments have also been interpreted differently by staff in institutions or across institutions, which has resulted in inconsistent application and potential differences in the operation of the SIUs.

# Governance (1 of 2)

## Governance structure

**A governance structure is in place across all levels of the organization that is generally clear and supports the SIU. However, some concerns were noted.**

- Various institutional management are involved with the SIU while also having responsibilities in other areas of the institution. These positions include:
  - Institutional Head (IH);
  - Deputy Warden (DW);
  - Assistant Warden, Interventions (AWI); and
  - Assistant Warden, Operations (AWO).
- The implementation of SIUs has resulted in increased workload for these positions given the differences in managing inmates in the SIU when compared to the former segregation model.
- The SIU governance model establishes different roles and accountabilities for institutional management depending on circumstances or based on a decision that must be taken. There is no one position working directly within the SIU on a full-time basis that has overarching responsibility for the day-to-day operations of the SIU.
- Indirect reporting relationships exist which can result in inconsistent or conflicting direction being provided.
  - For instance, health care staff and some interventions staff (e.g., teachers, Elders, Indigenous Liaison Officers [ILOs]) directly report to individuals outside the SIU but have informal-relationships with SIU-specific managers.
- Unclear and inconsistent reporting structures exist.
  - For example, it is not consistent from region to region who certain positions report to, and for certain positions it is not clear if they report to individuals at the institutional level or the regional level.
- Some management and staff at all levels of the organization feel it is not always clear who to contact at National Headquarters (NHQ) when they have SIU-related questions, as some issues are both operational and “corporate” in nature.

**Decision-making within the SIU is challenging at times, especially when there are different opinions on expectations between different groups (operations, interventions, health care).**

- There is usually an attempt to resolve matters at the working level first, prior to escalating to management/senior management. However, with the current structure, security often takes priority despite the various groups’ different objectives. This has resulted in friction amongst staff at times.
- Institutional management has suggested that the identification or addition of a specific position in charge of the SIU at the AWI or DW level would be beneficial for decision-making and due to the workload associated with SIU operations.

## Governance (2 of 2)

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### Information sharing

**Formal and informal sharing mechanisms are in place at the national, regional, and institutional levels for the purposes of regular information sharing and direction setting. Institutional management receives support from management at other institutions, Regional Headquarters (RHQ), and NHQ regarding the SIU. However, some institutional management feel that improvements could be made at the national level.**

- At the institutional and regional levels:
  - institutional level staff involved with the SIU typically have discussions with each other on a bi-weekly basis;
  - many institutional management are in regular contact with the Regional Senior Project Officer(s) (RSPO)<sup>1</sup>; and
  - institutional staff communicate with staff at other institutions to share information and best practices and discuss reintegration options for inmates.
- At the national level:
  - NHQ has established meetings with various SIU-related stakeholders at all levels of the organization; and
  - expectations are reviewed, continually revisited, and clarified during these meetings for the institutions and regions.
- Some institutional management feel that support at the national level could be improved. It was mentioned that the focus at the national level tends to be more on compliance and oversight (e.g., reviewing data quality, overseeing the number of inmates who have been authorized to the SIU, verifying whether inmates were offered four hours of time out of cell and two hours of interaction with others each day) instead of providing support directly to the institutions.
- Formal information sharing mechanisms (e.g., updates to SIU-related policy and guidance documentation such as interim policy bulletins, memos, and other electronic communications) support a common understanding of expectations and contribute to ensuring that key decisions and relevant information are effectively communicated.
- Informal mechanisms (e.g., SIU-related meetings, discussions, and other correspondence) contribute to providing management and staff at various levels with a support system to regularly obtain information on topics such as:
  - SIU case information (including complex cases);
  - SIU policy and process-related requirements, concerns, and updates;
  - SIU human resources updates;
  - LTE-SIU application updates;
  - good practices;
  - monthly reporting; and
  - infrastructure.
- Some staff occupying newly introduced positions such as Behavioural Skills Coaches (BSCs) and SIU Data and Activity Coordinators, or positions that differ in terms of their context in the SIU such as social programs officers (SPOs), have supported their peers at other institutions by sharing ideas and practices to better understand their role in the SIU.

<sup>1</sup> RSPOs are one part of the SIU oversight structure responsible for SIU oversight. They are the primary contact for the IEDM for case management inquiries, coordinate the sharing of information required by the IEDM, ensure SIU sites coordinate sharing of IEDM recommendations and decisions within the required timeframes, prepare SIU case reviews for the Assistant Deputy Commissioner, Correctional Operations (ADCCO), and provide advice and support to institutions to ensure compliance with SIU legal, policy and procedural requirements.



# Roles and Responsibilities

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## Understanding of roles and responsibilities

**Management and staff generally understand their roles and responsibilities related to the SIU. However, some duties are not documented, resulting in ambiguity and uncertainty.**

- It is not always clear how SIU positions and associated roles should work within the context of the SIU versus how they work in the mainstream population (e.g., teacher, SPOs, mental and physical health).
  - A document review confirmed that standardized job descriptions were often being used and did not always include SIU-specific roles and responsibilities.
- CD 711 and its associated guidelines outline additional SIU-related roles and responsibilities of some staff working in and supporting SIUs. However, not all staff with SIU-related roles and responsibilities are referenced within the CD and guidelines (e.g., BSCs and SIU Data and Activity Coordinators), and some expectations are not clearly identified (e.g., expectations of the SIU parole officer (PO) versus the inmate's PO from general population versus the PO at the institution where the inmate is being transferred to).
- Some staff in newly created positions (e.g., BSCs and SIU Data and Activity Coordinators) felt their role was not fully defined, which was further confirmed through a document review of their job descriptions.
- CD 711 indicates that the approving authority for an inmate's authorization to transfer to an SIU is the AWI. Most of the time, regions are requiring ADCCO consultation and/or agreement before an inmate SIU transfer. This direction was not found within CSC's policy instruments and some AWIs expressed concerns with this process, as it risks impacting the impartiality of the AWI in the authorization process.

## SIU-related training

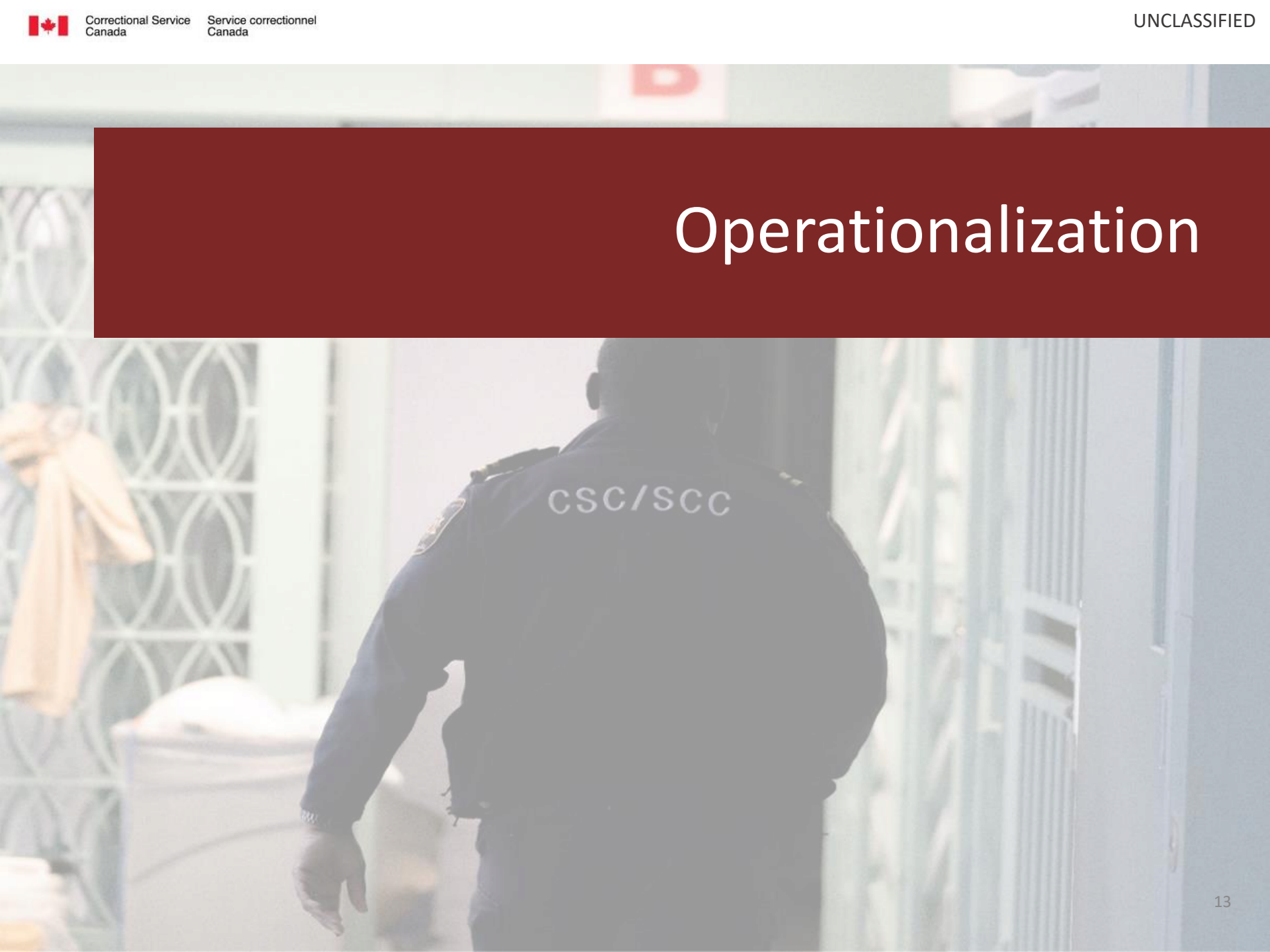
**Although CSC is currently in the process of developing SIU-specific training, staff often cited that they received little to no preparation or training prior to working in the SIU and mostly learned on the job. Not all staff fully understand the roles of other positions within the SIU.**

- Staff expressed a desire for further training on mental health, crisis intervention, the LTE-SIU application, and the vision and objectives for the SIU.
- While training provided to staff was most often on the LTE-SIU application, some staff who did not receive this training expressed a desire to receive it.
- Some staff expressed a lack of understanding of the roles and responsibilities of other positions that work in the SIU, as well as a lack of understanding of how their position differed from other positions that work in the SIU.
- Inadequate training may increase the risk to staff and inmate safety. Not fully understanding others' roles and responsibilities within the SIU causes frustration for staff because they do not know why certain positions are working in a certain manner.
- It was mentioned that informal training or information sessions would be beneficial to understand the role of each position working in the SIU.





# Operationalization

A photograph of a correctional officer in a dark blue uniform, seen from the back. The officer is walking through a facility with blue metal bars and a window with a decorative pattern. The text "CSC/SCC" is visible on the back of the officer's uniform.

CSC/SCC

# Multidisciplinary Approach

## Coordination of work among SIU staff

**Positions from various disciplines were added to institutions and assigned specifically to the SIU.**

- Examples of positions added to the SIUs include: SPOs, POs, correctional program officers (CPOs), COs, and Elders.

**A multidisciplinary approach is taken in the SIU. Staff were observed working together. This helps improve the operations and functioning of the SIU and supports a holistic and coordinated approach to managing inmates in the SIU.**

- 78% of the staff interviewed felt that the SIU team was taking a multidisciplinary approach to working with inmates.
- 72% of the staff interviewed felt that they were part of the multidisciplinary team.
- At the institutions, the staff were discussing specific inmate's cases and their planned approach.
  - Document review and interviews also indicated that most institutions are having SIU Correctional Intervention Board or Interdisciplinary Team (SIU-CIB/IDT) meetings on a regular basis to discuss SIU inmates, as outlined in CD 711. The meetings include representatives from operations, interventions, and health care.
- Having staff assigned specifically to work in the SIU contributes to ensuring a consistent approach and better coordination of activities through the rapport built between staff.

## Challenges with multidisciplinary approach

**Some positions do not feel part of the SIU team. At times, staff were found to be working in silos and not sharing information between disciplines.**

- Certain positions amongst the intervention staff reported that they did not feel like they were part of the multidisciplinary team.
- Some issues were identified during observations and interviews.
  - For example, in the SIU some COs were observed not communicating with intervention and case management staff about the timing of inmates' movement or why movement was not taking place. Staff appeared to become frustrated during these interactions.
  - Some correctional staff still holding what was expressed as the "segregation" mentality.
  - At times, Elders were not respected when requesting assistance.
- Some institutional management and staff identified concerns regarding staff not taking a multidisciplinary approach.
  - For example, correctional staff did not always respect interventions or health care staff (e.g., not supporting proposed plans for inmate interactions, ignoring or not making them feel welcomed when entering the range, etc.) and a culture change was still required to move away from what was expressed as the "segregation" mindset.
- Based on file reviews and interviews, although each discipline (interventions, operations, health care) is consulted as part of the decision-making process, some positions within those disciplines are not always consulted.
  - For example, some COs and Elders indicated that they were not consulted. Although policy indicates that all staff must actively explore and consider all reasonable alternatives to confinement in an SIU, the COs explained that it was often left to the managers.

# Financial Information

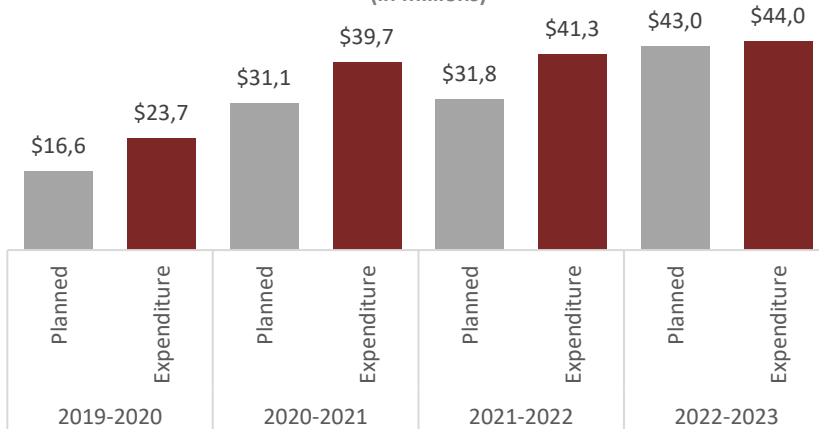
## SIU funding

**The implementation and ongoing operation of the SIUs has cost more than anticipated in the planned funding request<sup>1</sup>.**

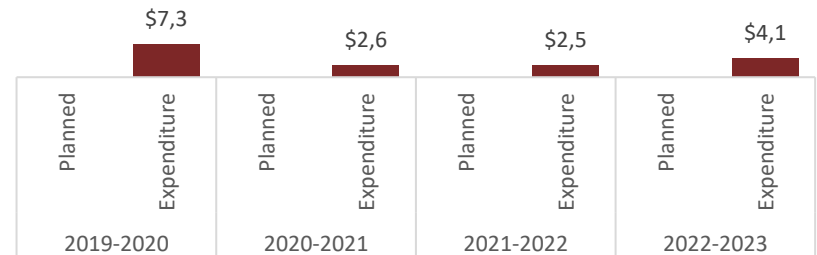
- Over the four years analyzed, SIU expenditures<sup>2</sup> have consistently exceeded the forecasted spending for SIU activities. Expenditure in excess of forecasts fluctuated between approximately \$1.0 million and \$9.5 million over the four years<sup>3</sup>. However, as CSC had authority to redistribute funds as appropriate, CSC has managed the creation of SIUs without exceeding the total funding received for the Transforming Federal Corrections initiative (Bill C-83).

- There was no planned operations and maintenance (O&M)<sup>4</sup> budget for infrastructure. However, significant expenditures were incurred for this purpose.
- Construction projects were undertaken at some institutions prior to the SIUs becoming operational, and there are still changes being made.
  - This has included adding common rooms, program rooms, Indigenous specific rooms, barrier/interview rooms, and yards.

SIU comparison between planned funding and actual expenditures  
(in millions)



Infrastructure planned funding and actual expenditures (in millions)



Note about years identified in graphs: 2019-2020 is April 2019 to March 2020, 2020-2021 is April 2020 to March 2021, 2021-2022 is April 2021 to March 2022, and 2022-2023 is April 2022 to March 2023.

<sup>1</sup> Planned refers to additional SIU funding received to operate SIUs via Bill C-83 Transforming Federal Corrections.

<sup>2</sup> Expenditures include direct costs associated with SIU activities.

<sup>3</sup> New collective agreements were not factored into the planned funding for SIUs. Funding received for SIUs was used to absorb the cost of these salary increases. The impact of retroactive payment and salary adjustments is reflected in 2021-2022 expenditures.

<sup>4</sup> O&M refers to non-routine maintenance and repairs as well as initial start-up purchases and expenditures for building maintenance not covered under the Treasury Board Secretariat's definition of capital asset. Funding received for SIUs was used to absorb these costs.

# Human Resources (1 of 2)

## Funding additional resources

Since inception, additional funded positions have been added to the SIUs. There is enough funding for all positions identified in the SIU model; however, institutions are adding positions in surplus of the SIU model and as a result, institutions are having to use funds which were identified for other areas of the institution for these additional positions.

- As a result of a CSC needs analysis, additional human resources costing over \$16 million have been added to the SIU beyond the initial funding.
  - Positions added include BSCs, CPOs, POs, SIU managers, and SIU Data and Activity Coordinators<sup>1</sup>. Administrative positions were also added at the regional and national levels.
- There have been additional management, correctional and interventions staff added at some institutions which are funded internally to help relieve SIU-related workload pressures and are not covered by funding allocated for SIUs.
  - Based on interviews and requests made to institutions to identify positions which are funded internally, many institutions will add additional staff to the SIU when the number of inmates approaches maximum SIU capacity. This results in less resources being available for non-SIU inmates.
  - For interventions positions such as POs, SPOs, and CPOs, some are added on a temporary basis, while others are added on a permanent basis.
  - For COs, this additional coverage in the SIU is provided through extra duty posts or operational enhanced security. At times, due to the fluid nature of the SIU population, these additional CO positions working in the SIU are not captured as SIU-specific positions in the SDS; therefore, it is difficult for CSC to determine the full number of CO positions required to operate the SIU on a daily basis.

**The full cost of human resources allocated to SIUs is not known. This impacts CSC's ability to accurately track and assess staffing needs and financial expenditures. Additionally, there are financial and operational impacts on other areas of the institutions.**

- An SIU environmental scan completed in June 2023 identified that SIU positions are not currently coded to differentiate them from the overall positions within the institution where they are located, which restricts the availability of data specific to SIU positions.
  - Not having all SIU positions identified and differentiated from the overall positions within the institution also limits the ability to properly assess workloads of SIU staff and allocate additional funding for these positions.
  - Some institutions become dependent on these additional positions, which cannot be guaranteed without permanent funding. This leaves CSC vulnerable to not meeting its legislative obligations and fulfilling its mission and objectives should challenges continue due to various factors (e.g., fiscal climate or increased number of SIU transfers).
- As well, operationally, institutions are adjusting staffing levels within other areas of the institution and reassigning those staff to the SIU. This reduces the ability for other areas of the institution to function as intended or increases the risk of security-related incidents occurring.

<sup>1</sup> It should be noted that not all additional positions apply to women's institutions. Women's institutions tend to have behavioural counsellors and primary workers dedicated to the SIU. Other staff in the case management team also tend to follow inmates from the mainstream population.

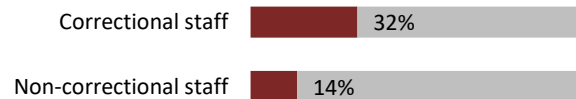
## Human Resources (2 of 2)

### Staff vacancies and turnover

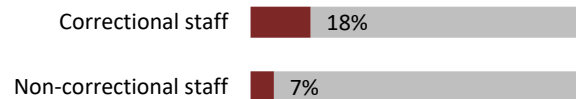
**Staff vacancies and turnover exist within the SIUs. This impacts the overall functioning of the SIUs, leads to inconsistency and instability within the SIU team, and increases workloads for staff.**

- Although additional CO coverage has been provided in SIUs at some institutions, correctional staff in the SIU had higher turnover<sup>1</sup> and vacancy rates, compared to non-correctional staff in the SIU.

#### Turnover rate in the SIU



#### Vacancy rate in the SIU



- Correctional Manager (CM) positions had the highest turnover rate for correctional staff in the SIUs (43%).
- ILOs experienced the highest turnover rate for interventions positions in the SIUs (40%). Both Indigenous Correctional Program Officers and ILOs have the highest vacancy rate amongst the intervention staff in the SIUs (16%).
- Interviewees noted repeated turnover for intervention positions such as SIU managers, SPOs, CPOs, and POs.
- Over a quarter (28%) of institutional staff interviewed reported wanting to leave the SIU in the next two years, as the SIU is considered to be a more demanding posting than others in the institution.
- Staff vacancies and turnover results in instability within the SIU team, which can also increase the risk of errors or negatively affect the ability to build a consistent rapport between inmates and staff.
- Interviewees noted frustration among inmates in the mainstream population related to the perception that resources are being taken away from them to support the SIUs in meeting legislative requirements.
- Staff interviewed also expressed feelings of frustration, discouragement, stress, and lack of motivation to fulfill their roles and responsibilities because of a heavy workload, busy schedule, and inmates being disengaged or refusing to avail themselves of the opportunity to spend time out of cell.
- Most commonly, it was mentioned by staff interviewed that more interventions staff are needed, which included CPOs, POs, Indigenous Interventions staff, and SPOs.
  - For example, there is a need for more Elders and staff supporting Indigenous inmates as these staff carry high caseloads.
- Additionally, some staff would like to see scheduling changes for some interventions staff to allow for additional support and coverage during evenings and weekends.

**Although there are several challenges for staff working in the SIU, approximately half of staff interviewed (51%) liked working there.**

- The following reasons were cited:
  - challenging work environment;
  - valuable learning experience;
  - great staff to work with;
  - feeling of being a role model; and
  - meaningful work.

<sup>1</sup> For the purpose of the turnover analysis, turnover was defined as the rate at which employees left the SIU. Thus, turnover rates do not include employees who were promoted within the SIU, demoted within the SIU, or moved to another position within the SIU. Additionally, data limitations related to identifying all SIU positions (refer to "Human Resources" section, "Funding additional resources", for additional information) may have impacted the calculation of the vacancy and turnover rates.

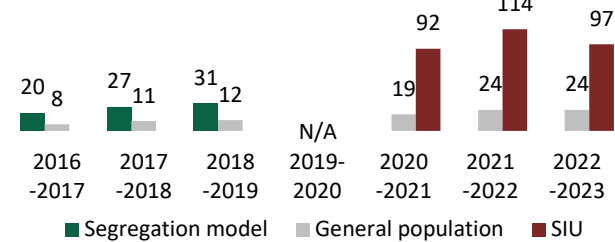
# Safety and Security (1 of 2)

## Prevalence of assaults and incidents among populations

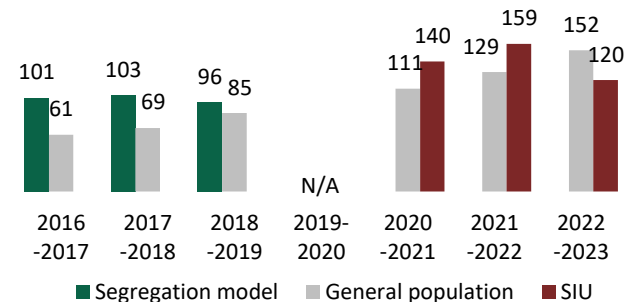
**Inmates who had been authorized to transfer to an SIU demonstrated higher rates of involvement in assaults when compared to the mainstream population and the previous segregation model.**

- Prior to the implementation of SIUs a risk was identified that CSC will not be able to maintain required levels of operational safety and security in institutions with the elimination of segregation.
- The rates of assault on staff by inmates, and on inmates by inmates (with the exception of 2022-2023), were higher for inmates who had been authorized to transfer to an SIU compared to the general population and the previous segregation model. The surge in assaults against staff was mainly driven by assaults involving fluids or waste.
- The rate of use of force incidents was also higher for inmates who had been authorized to transfer to an SIU. Most use of force incidents are related to incident types “Behaviour Related” (e.g., disruptive behaviours) or “Assault Related” (e.g., inmate fight). Rates were higher at women’s institutions than at men’s institutions.
- This increase in rates of assaults and incidents is further substantiated by interview responses referencing a changing inmate profile (i.e., younger, more violent or having more complex needs), particularly at women’s institutions.

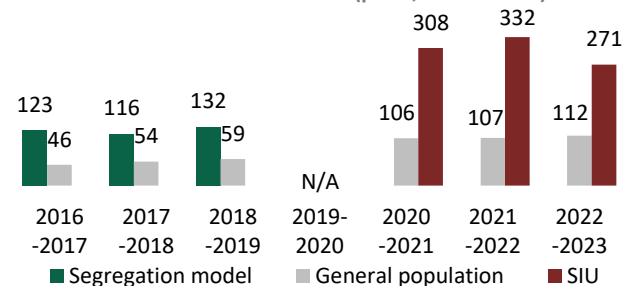
Rate of assaults on staff by inmates (per 1,000 Inmates)



Rate of assaults on inmates by inmates (per 1,000 Inmates)



Rate of use of force incidents (per 1,000 inmates)



Note about incident data: An incident occurred if one of the participants in the incident (no limitations on role and/or involvement) had an active SIU authorization for transfer on the incident date. Therefore, the data includes inmates who met any of the three SIU authorization criteria.

Note about years identified in graphs: 2016-2017 is April 2016 to March 2017, 2017-2018 is April 2017 to March 2018, 2018-2019 is April 2018 to March 2019, 2019-2020 is April 2019 to March 2020, 2020-2021 is April 2020 to March 2021, 2021-2022 is April 2021 to March 2022, and 2022-2023 is April 2022 to March 2023.

## Safety and Security (2 of 2)

### Safety and security concerns

**Concerns regarding safety and security in the SIU were prevalent amongst staff and inmates.**

- Some staff that experienced threats or assaults from inmates, expressed concerns with unpredictable behaviour and the volatility of some inmates.
- Interventions staff shared concerns with not being properly escorted or monitored. Some recalled incidents of being alone or locked in program rooms with inmates for an extended time.
- Some staff also expressed their concern for themselves or for others, particularly women working in men's institutions. A review of Threat Risk Assessments (TRAs) as well as on-site observations confirmed that some inmates have male-only protocols in place due to the nature of their behaviours towards women.
- 45% of inmates interviewed reported not feeling safe in the SIU as they feel other inmates can be hostile and violent.
- Both inmates and staff expressed that incidents have occurred where incompatibles crossed paths, resulting in physical altercations.

### Addressing concerns

**Overall, the safety and security of staff and inmates in the SIU are taken seriously with procedures put in place when deemed necessary.**

- Management reported addressing staff safety concerns by adapting operations and procedures as needed; for instance, requiring the use of barriers during inmate interactions when it is supported by a TRA.
- Some staff expressed concerns regarding insufficient communication of TRAs and the need to use barriers, as well as the pressure to remove barrier restrictions early or feeling a reluctance to use them.
- Staff interviewed explained that inmates' safety and security concerns are reported to correctional staff and appropriate measures are taken; for instance, by strategically changing how an inmate is grouped with others.

### Infrastructure

**There are concerns related to institutional safety and security due to inadequate infrastructure.**

- Observations and staff interviews identified many infrastructure issues that led to safety and security concerns. They include:



Lack of cuff slots to facilitate handcuffing an inmate



Insufficient number of cameras



Program areas out of sight



Availability and use of Personal Portable Alarms (PPA) and portable radios



Furniture or equipment not bolted down

# Infrastructure and Equipment (1 of 2)

## Inconsistent infrastructure

**CSC has not established minimum standards for infrastructure in the SIU. This has resulted in significant variations across SIUs in terms of the number, size, and locations of areas available for inmates to utilize.**

- SIUs were placed into pre-existing locations within the institutions; thus, there were limitations to the design of the units.
  - For instance, non-SIU inmates reside on ranges within the same buildings as the SIU, and the location of many of the spaces such as rooms and yards were already established. This means that at some institutions, non-SIU inmates are within visual and/or physical proximity of the SIU and in some cases, time spent in rooms and yards is split between SIU and non-SIU inmates.
- A review of the number of spaces available for inmates to spend time out of cell revealed significant variances across institutions. When comparing the institutions visited, it was found that some SIU inmates are not able to be out of cell with other inmates or can only do so in small groups (two to three inmates); therefore, if all inmates wanted access to a yard or room, or the SIU was at full capacity, it would not be possible for all inmates to be out of their cell.

## Impacts of infrastructure

**Inconsistent and insufficient infrastructure impact CSC's ability to meet its obligations to offer time out of cell and interaction with others.**

- In addition to the safety and security concerns previously identified (refer to "Safety and Security" section, page 19, for additional information), 90% of institutional staff and management have concerns with the existing infrastructure at their SIU location.
  - They most frequently cited the need for more inmate spaces.
- Through interviews and observations, it was noted that at some institutions, there were not enough areas (e.g., yards and rooms) available for inmates, or it took a significant length of time to move an inmate from their cell to the designated area. For example:
  - due to the layout of the SIU, inmates could often not be moved out of their cell while other inmates were moving, which often delayed the start of an inmate's time out of cell; and
  - at times, inmates would be willing to accept an offer to come out of their cell, but there were no rooms available.
- As noted through interviews and observations, due to the unavailability of barrier-free spaces, some interactions took place through barriers when there was no need to have them in place.

“ Have to consider the infrastructure. We can barely get by with what we have now. ”  
– Staff



## Infrastructure and Equipment (2 of 2)

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### Equipment for inmates

**Minimum standards for equipment available to inmates in the SIU have not been established by CSC, resulting in significant variances in availability.**

- National minimum standards have not been established for the equipment available for inmate use in the SIUs, such as workout equipment, phones, kitchen appliances (e.g., fridge, microwave), washers and dryers. This has resulted in significant variances in the amenities available for inmates to utilize while out of their cells.
- It was noted during interviews and observations that equipment availability for inmate use is important to encourage inmates to come out of their cells. For example, having an insufficient number of phones available impacts an inmate's ability to remain in contact with those outside the institution, including family and community ties.
- There are a number of additional items that inmates and staff would like to see added to SIUs, including:



Basketball nets and  
yard benches



Better or more  
gym equipment



Microwaves



Computers



Additional phones



Televisions

- Staff expressed concerns that inmates are often breaking the available equipment and that they are not able to protect it. Having to constantly replace the equipment that inmates are breaking results in additional costs to CSC.
- Some additional equipment and infrastructure changes have taken place or are planned (e.g., adding gym equipment into the outdoor yards). These changes will address some of the need for additional items.

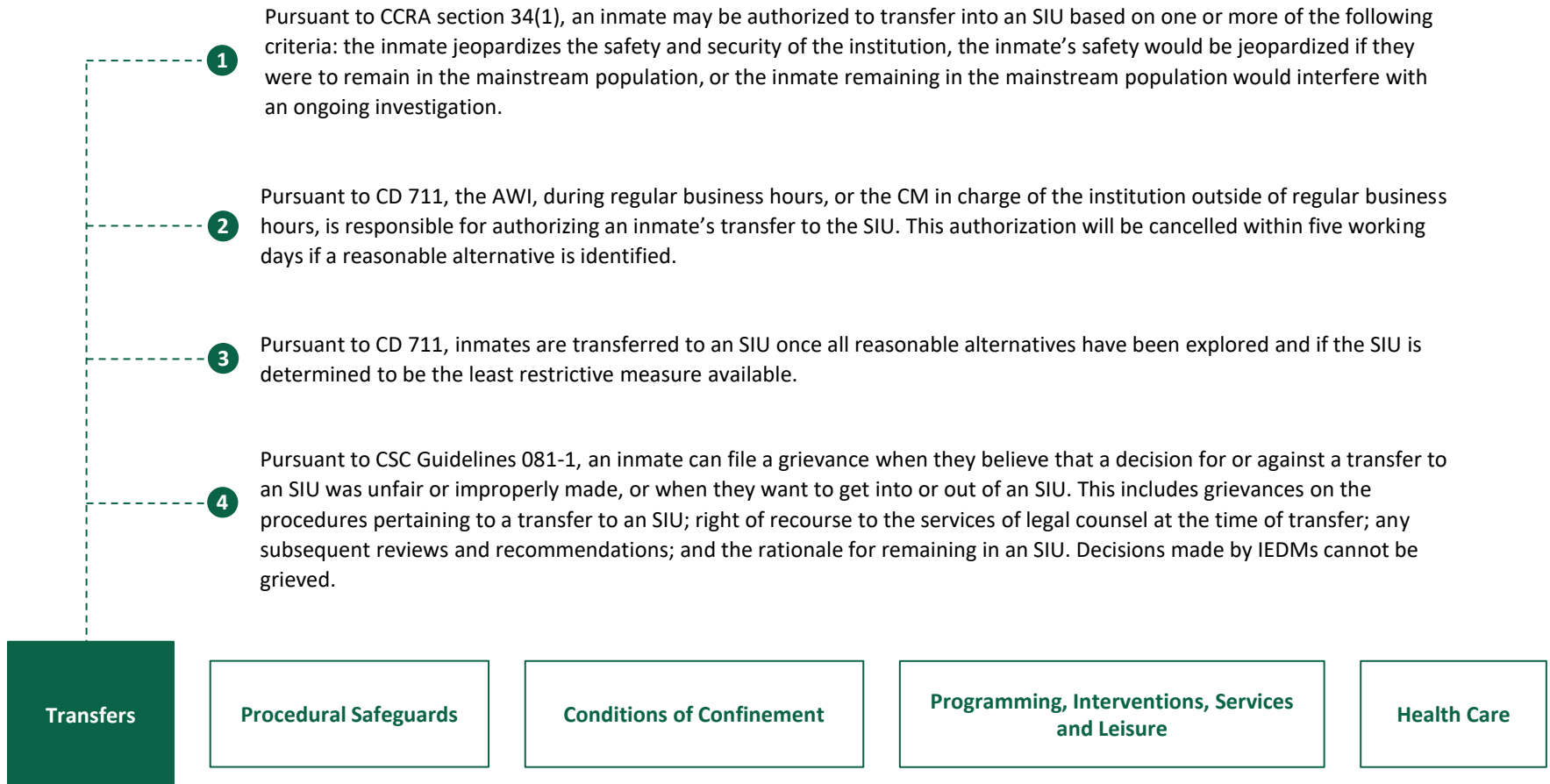


# Management of Inmates



# Overview of SIU Transfers

An overview of the procedures related to transfers is presented below.

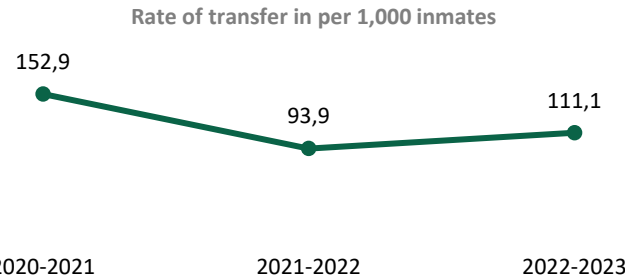


# Transfer Authorizations (1 of 2)

## Rate of transfer authorization

Rates of transfer authorizations to the SIU have varied over the years.

- National transfer authorization rates significantly decreased from 2020-2021 to 2021-2022 but increased in 2022-2023.



- Men consistently had higher transfer authorization rates than women.
- Indigenous inmates had higher transfer authorization rates than non-Indigenous inmates.

## Reasons for transfer authorization

The profile of inmates transferred to the SIU has changed over the years.

- Initially, most inmates were transferred to the SIU for jeopardizing the safety and security of the institution (58.3% in 2020-2021). However, over time, the most common reason for transfer was for the inmate's own safety (49.8% in 2021-2022 and 50.4% in 2022-2023).
- Interviewees explained that some institutions have felt pressured to accept inmates with more challenging profiles. When these inmates impose their influence on the population, this results in an increased risk for victimization.

## Documentation for transfer authorization

In accordance with policy, all SIU authorizations analyzed were completed within the required timeframes and were either completed directly by the AWI or confirmed or cancelled the next working day by the AWI. However, some forms did not include documented evidence of consultation with the inmate's Case Management Team.

- 100% (75/75) of SIU authorization forms analyzed included the incident description or circumstances for transfer.
- 71% (53/75) of SIU authorization forms analyzed included evidence of consultation with the Case Management Team. The 29% (22/75) of SIU authorization forms analyzed that were missing this evidence took place after hours (i.e., evenings and weekends). Documenting evidence of consultation with the inmate's Case Management Team supports CSC's ability to demonstrate that all reasonable and viable alternatives to a transfer to an SIU have been explored, as required by CD 711.

**Although the criteria for authorizing an inmate transfer to the SIU were clear and understood, 54% (36/67) of institutional management interviewees mentioned that they have challenges applying them.**

- For instance, some inmates may satisfy multiple authorization criteria (which cannot be entered into the LTE-SIU), and there can be uncertainty around the appropriate recording of authorizations for inmates who resist to integrate into a non-SIU population (as this is a scenario not covered in legislation and policy).
- Regional staff review SIU authorization forms to confirm whether the legislative criteria was met to authorize an inmate transfer to the SIU. However, the risk remains that staff authorized a transfer when it should not have been authorized, thus resulting in non-compliance with legislation.

## Transfer Authorizations (2 of 2)

### Factors influencing transfer authorizations

There are various contextual factors that influence a decision-maker's judgement in the consideration to transfer an inmate to the SIU.

- The main contextual factors identified by interviewees included:
  - reluctance or hesitancy to use the SIU (e.g., pressure to keep the number of transfer authorizations low);
  - insufficient time to investigate the incident or the inmate prior to authorizing a transfer to the SIU; and
  - availability of alternatives, particularly when they are all perceived to have been exhausted.
- As referenced by some staff and observed during institutional visits, in response to pressure to keep SIU numbers low, inmates who otherwise would have been authorized for a transfer to the SIU based on meeting the legal criteria are sometimes housed in other ranges in the institution.
- Interviews and file review of SIU authorization forms confirmed that institutions are working to ensure that various factors and alternatives are considered prior to a transfer to the SIU. Examples include:
  - institutional or inmate safety;
  - inmate comments/statements;
  - informal conflict resolution;
  - needs or risks of inmate;
  - cultural interventions;
  - suitability of another institution; and
  - security reclassification.

### Indigenous Social History (ISH) considerations on transfer authorizations

In accordance with legislative and policy requirements, documentation exists to demonstrate that ISH is considered as part of the SIU authorization process. However, there are challenges when considering the ISH in the context of the authorization.

- Some institutional management feel that it was not clear how ISH factors apply to the transfer authorization and that ISH does not impact the decision to authorize the inmate into the SIU if the inmate's risk in the institution supersedes the factors.
- Interviewees also noted challenges in finding culturally appropriate alternatives for Indigenous inmates when a transfer to the SIU is being considered.

### Alternatives to SIU at women's institutions

**There is a lower number of transfers to the SIU at women's institutions. This is largely due to the availability of alternative options and the interdisciplinary team approach to the Intensive Interventions Strategy (IIS) at women's institutions.**

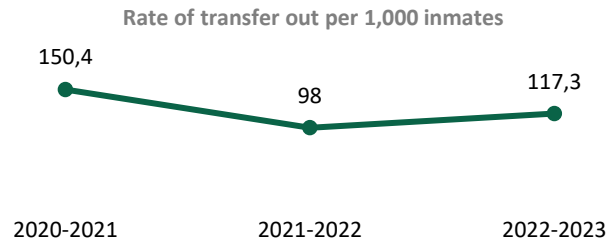
- Staff at women's institutions credited their low number of SIU transfers to:
  - availability of options specific to women's institutions (e.g., Structured Living Environment Units and Enhanced Support Houses);
  - effective programming, activities, or interventions;
  - lower number of inmates overall;
  - characteristics of women (e.g., women are generally less violent, prefer building relationships, and less likely to misdirect anger towards others when compared with men); and
  - effective interdisciplinary approach.
- However, infrequent use of the SIU presented challenges for staff, who often needed to refamiliarize themselves with SIU policy each time a woman was authorized to the SIU.
- At some women's institutions, unused SIU cells were repurposed for other uses (e.g., medical isolation or observation). At times, this impacted opportunities for time out of cell or interaction time for SIU inmates (e.g., due to disruptions on the SIU range or not being able to use the range to facilitate activities).

# Transfers Out (1 of 2)

## Rates of transfers out

Rates of transfers out of the SIU have varied over the years.

- The goal of SIUs is to return the inmate to mainstream population as soon as safely possible. National transfer out rates significantly decreased between 2020-2021 and 2021-2022 but increased in 2022-2023.
- Of the fiscal years (FYs) analyzed, 2020-2021 was the only FY where the transfer out rate was lower compared to those that were transferred in (refer to “Transfer Authorizations” section, page 24, for trend data).



- Men had consistently higher transfer out rates than women.
- Indigenous inmates had higher transfer out rates than non-Indigenous inmates.

## Transferring to a new institution

There is consultation with, and support from, receiving institutions for intra-regional and inter-regional transfers. However, there are challenges with transfer documentation.

- File review data noted that institutions are being consulted prior to transfer and that receiving institutions are typically supportive; however, some interviewees noted that at times the receiving institutions are not in agreement with the transfer that is being proposed making it more of a challenge to find a suitable population to transfer the inmate to.
- Gaps were noted with regards to information that was included within Assessments for Decisions (A4Ds), as a review of A4Ds found that 38% (8/21) did not reference any previous SIU transfers and 29% (6/21) did not provide a summary and analysis for previous SIU transfers.

## Transfer times

Transfer times did not reflect the actual amount of time required to arrange a transfer, the strains on staff and resources, and the infrequency of ground transportation and flights.

- An analysis of transfer time subsequent to an IH decision to transfer an inmate out of the SIU suggested that the actual amount of time to arrange a complete transfer was not being captured.
  - The median transfer times were less than a day. The average varied from 8 to 17 days.

Average number of days between IH decision to actual transfer



- Longer wait times for transfers within the same institution may have occurred when a decision had been rendered to transfer the inmate out of the SIU but after this decision was made, the inmate's behaviour suggested that they may still pose a risk to their own safety, to others or to the security of the institution. As a result, the inmate was not immediately transferred out.
- Inmates are prioritized for flights depending on their specific circumstances, but due to the infrequency of intra-regional ground transportation and inter-regional flights, inmates have at times been required to remain in the SIU at their current institution for longer than necessary.
  - This issue is compounded at women's institutions as inter-regional transfers are often the only choice.
- Other challenges with transfers out included inmates needing to remain in the SIU while awaiting court, the transfer of inmate property, and limited population options to transfer inmates due to incompatibles. These challenges complicated the ability to facilitate the transfer of some inmates following an approved transfer decision and placed additional strains on resources.

## Transfers Out (2 of 2)

### Readiness for transfer out

The objective to transfer an inmate out as soon as possible has raised questions as to whether an inmate was ready to transfer out of the SIU.

- Staff mentioned that in some cases they did not think an inmate was ready to be transferred out, mainly due to the inmates' needs or risks not having been addressed, or continued safety and security concerns.
- In these circumstances, staff reported that they would try to minimize the risks posed by these transfers by developing a risk management plan.
  - For example, taking preventative measures or finding a suitable alternative for the inmate.

### Inmates' refusal to transfer out

There are inmates who refuse to transfer out of the SIU, impacting average wait times for transfers.

- A major factor impacting the amount of time between the decision to transfer out and the actual transfer was an inmate's resistance to leave the SIU.
- Based on the administrative data analyzed, close to one in five (18%) inmates refused to transfer out after an IH decision.
  - In addition, refusals were more commonly cited by staff working at men's institutions.
- Average wait times substantially decreased when refusals were factored out of the calculation.

Average number of days between IH decision to actual transfer out for inmates who did not refuse transferring out

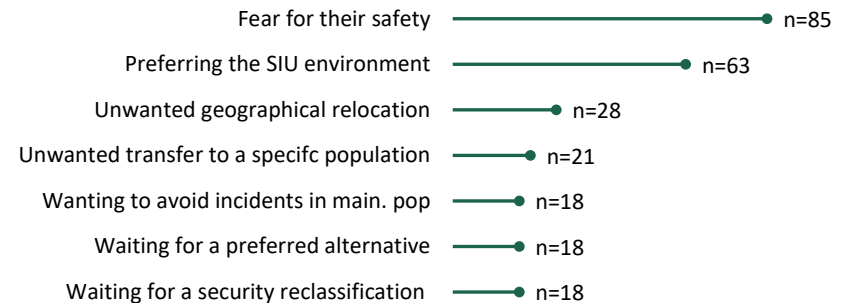


### Reasons for refusals

Reasons for inmate refusals to transfer out of the SIU were mainly due to safety concerns or preference for the SIU environment.

- Staff interviewees identified several reasons for an inmate's refusal to transfer out of the SIU.

Most cited reasons for inmate refusals (n= number of respondents)



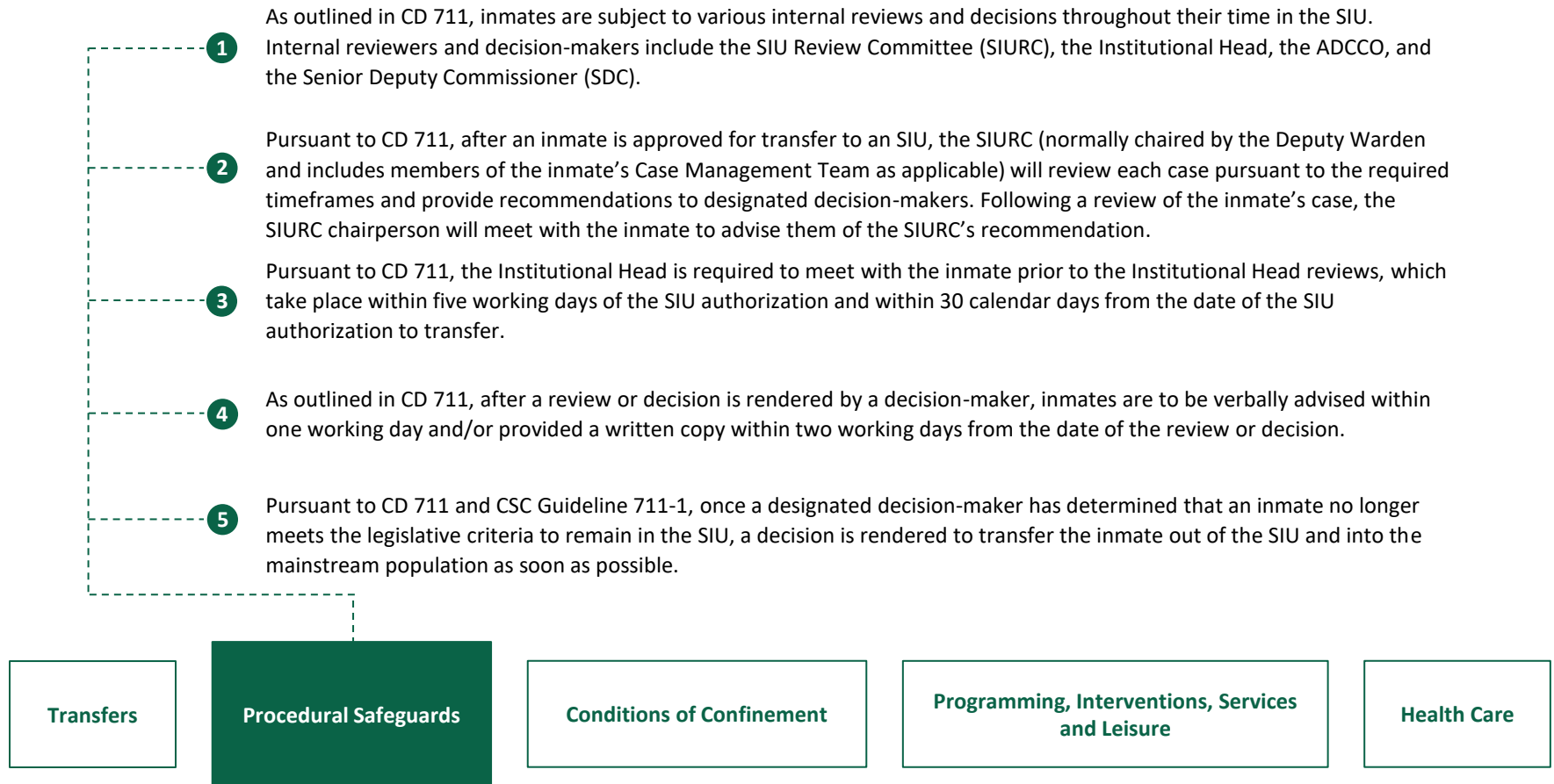
- Many inmates interviewed noted that while they wanted to transfer out of the SIU, they were waiting on a preferred option. For example, they wanted:
  - security reclassification;
  - transfer to a specific population or institution; and
  - transfer somewhere they would feel safe.

In response to these challenges, efforts were made to encourage inmates to transfer out of the SIU.

- Staff shared strategies used to get inmates to transfer out of the SIU. They include encouraging and negotiating with inmates or addressing their concerns; collaborating with other staff; waiting until the inmate accepts a voluntary transfer; and involuntarily transferring the inmate (e.g., using negotiators or the Emergency Response Team).
- Staff also used creative strategies to ease inmates' reintegration to a mainstream population, such as range visits or doing a gradual return to the range.

# Overview of Procedural Safeguards

An overview of procedural safeguards is presented below.





# Procedural Safeguards (1 of 3)

## Comprehensiveness of SIURC recommendations and IH reviews

**When recommending whether an inmate should remain in the SIU, SIURCs were considering various alternatives and assessing the associated risks.**

- 29% (499/1,724) of SIURC recommendations examined between April 2021 and March 2023 that were made prior to the IH 30-day SIU transfer decision recommended that the inmate be transferred out of the SIU.
- 78% (1,686/2,163) of inmates transferred out of the SIU after an SIURC recommendation to transfer out were successful<sup>1</sup> in not returning to the SIU, a much higher percentage than that for SIU inmates overall. This suggests that their approach to considering alternatives and assessing risks when making recommendations is effective.
- Most interviewees spoke to an efficient SIURC process with minimal delays, as decision-makers receive timely recommendations within the 20-day review deadline and generally regard this timeframe as appropriate. File review confirmed that SIURCs took place within the required timeframes for the sample selected.

**IH reviews determining whether an inmate should remain in the SIU generally took place at the required interval and were completed by the appropriate authority. However, some information required by CSC Guidelines 711-1 was missing within the review documentation.**

- 79% (53/67) of the IH 5-working day SIU transfer decisions analyzed did not have all required sections completed.
  - Sections most commonly missing information included inmate representations including legal counsel/assistant, inmate engagement in opportunities for interaction with others, and inmate personal representation.
- 62.5% (30/48) of the IH 30-day SIU transfer decisions analyzed did not have all required sections completed.
  - Sections most commonly missing information included inmate representations including legal counsel/assistant and gender identity/expression factors.

## Outcome of IH reviews

**In some instances, decision-makers believed that the legislative criteria was no longer met for an inmate to remain in the SIU.**

- The decision-maker believed that the legislative criteria was no longer met for the inmate to remain in the SIU 27% (18/67) of the time for the IH 5-working day SIU transfer decisions reviewed, 52% (25/48) of the time for the IH 30-day transfer decisions reviewed, 40% (20/50) for the regional reviews reviewed, 10% (3/31) of the time for the SDC decisions reviewed, and 31% (13/42) of the time for the non-ad-hoc SIURC recommendations reviewed.
- Most often, it was determined that the inmate had a viable option for transfer to another unit, range, or other institution, or the behaviours that resulted in their initial transfer to the SIU were no longer present.
- When the decision-maker determined that an inmate no longer met the legislative criteria to remain in the SIU, they rendered a decision to transfer the inmate out of the SIU. However, at times, it can be challenging to remove the inmate from the SIU after this decision has taken place (refer to “Transfers Out” section, pages 26 and 27, for additional information). This impacts CSC’s ability to fulfill CCRA section 34 “an inmate’s confinement in an SIU is to end as soon as possible”.

### Transfer-related grievances

**Inmate grievance decisions indicate that not all SIU transfers are compliant with legislative and policy requirements.**

- Between April 2021 and March 2023, a total of 121 grievances regarding an inmate’s SIU transfer were filed. Of those, 21.5% (26/121) were upheld or upheld in part<sup>2</sup>.

<sup>1</sup> CSC defines a transfer as successful if an inmate remains in mainstream population for a period of 120 days or more after release. Refer to “Measuring Performance” section, page 50, for year over year successful transfers out percentages.

<sup>2</sup> A grievance is upheld when the decision being grieved is justified, the treatment of the inmate or the procedure was unfairly or arbitrarily applied or was contrary to guiding legislation or policy. A grievance is upheld in part when several issues are grieved and/or elements are addressed in the response to the grievance but not all of them are upheld (i.e., other elements are denied, rejected, or no further action is required).

## Procedural Safeguards (2 of 3)

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### Meeting with inmates and quality of information sharing discussions

**Not all files reviewed had evidence to demonstrate that meetings occurred when required, pursuant to policy requirements. There was variation in the quality of discussions taking place when information was being shared with inmates.**

- CD 711 requires the IH to meet with the inmate prior to making their 5-working day and 30-day SIU transfer decisions.
  - A meeting occurred between the inmate and IH 46% (31/67) of the time prior to the 5-working day IH decision, and a meeting occurred between the inmate and IH 31% (15/48) of the time prior to the 30-day IH decision.
- Without sufficient discussions between the inmate and the decision-maker prior to decisions taking place, all pertinent information may not be shared.
- CD 711 requires the SIURC chairperson to meet with the inmate to advise them of the SIURC recommendation.
  - The Chairperson of the SIURC met with the inmate 14% (6/42) of the time to advise them of the recommendation that was being proposed to the decision-maker regarding whether they should remain in the SIU.
- Although 89% (17/19) of the inmates who were asked indicated that they received information in writing regarding their time in the SIU, about 33% (8/24) of institutional management interviewed indicated that they have challenges sharing information verbally or in writing with inmates.
  - One challenge mentioned was sharing information in the inmate's official language of choice.
- It was observed that the quality of discussions taking place when decisions were being shared varied from institution to institution and depended on the individual who was sharing the information.
  - At some institutions there was an engaged discussion, while at others, the inmate was provided with the paperwork without a discussion taking place.
- Without sufficient discussions following a recommendation or decision, the inmate may not be aware of, or understand, the recommendations and decisions being made.

## Procedural Safeguards (3 of 3)

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### Sharing information with inmates – verbal and written notification of reviews and decisions

**Not all files reviewed had evidence to demonstrate that inmates received written and verbal notification of decisions related to their time in the SIU within the required timeframes, pursuant to legislative and policy requirements.**

- CD 711 requires the inmate to be verbally notified within one working day, and provided the written decision within two working days, upon completion of the IH 5-working day SIU transfer decisions and IH 30-day SIU transfer decisions.
  - In 42% (48/115) of the files reviewed, evidence was missing of verbal notification taking place within one working day. In 49% (56/115) of the files reviewed, evidence was missing of written notification taking place within two working days.
- CD 711 requires the inmate to be provided the written decision within two working days upon completion of a regional review.
  - In 66% (33/50) of the files reviewed, evidence was missing of written notification taking place within two working days.
- CCRR section 23.01(2) requires the inmate to be verbally notified within one working day, and provided the written decision within two working days, upon completion of the Commissioner's decision (which has been delegated to the SDC as per CD 711).
  - In 25% (8/32) of the files reviewed, evidence was missing of verbal notification taking place within one working day. In 19% (6/32) of the files reviewed, evidence was missing of written notification taking place within two working days.
- Only 42% (11/26) of information or decision sharing interactions observed across all institutions were documented in the LTE-SIU.
- Reviews of inmates' paper files were completed while visiting the institutions to see if a handwritten signature could be located on the documentation shared with the inmate. A handwritten signature by the inmate and/or two staff witnesses is required on review and decision documentation to acknowledge that the document was shared.
  - In 17% (22/129) of the files reviewed, the information sharing documents could not be located.
  - 94% (101/107) of the information sharing documents that could be located had a handwritten signature to acknowledge that the document was shared.

# Overview of Conditions of Confinement

An overview of the procedures related to the conditions of confinement is presented below.

**1** Pursuant to CCRA sections 36(1), once transferred to the SIU, CSC is required to offer inmates a minimum of four hours of time out of the cell and a minimum of two hours of meaningful interaction.

**2** Pursuant to CD 711, while an inmate is in the SIU, every effort will be made to provide them time out of cell and interactions with others without the use of barriers. Any imposition of barriers for inmates transferred to an SIU must be supported by the completion of an SIU Threat Risk Assessment (SIU-TRA) that identifies the specific risk(s) the inmate presents as well as the barriers required to mitigate the risk(s). Where barriers are used on an inmate, a daily SIU-TRA must be completed to confirm the need for continued use, to amend the use or type of barrier, or to discontinue the use.

Pursuant to CCRA section 37.83(1) and CCRR sections 23.06(1) and 23.07(1), an IEDM review can be triggered when:

- 3**
- an inmate is not out of cell for a minimum of four hours/day OR an inmate is not engaging in meaningful human contact for a minimum of two hours/day for five consecutive calendar days, for 15 out of 30 calendar days, or for 10 consecutive calendar days; and
  - an inmate who was authorized to be transferred to an SIU at least four times within a period of 180 consecutive days and the case was not, during that period, referred to the IEDM.

**4** Pursuant to CCRA section 37.83, when an IEDM review is triggered, the IEDM determines whether CSC has taken all reasonable steps to provide the inmate with opportunities for time outside of their cell and encourage the inmate to avail themselves of those opportunities. If the IEDM determines that CSC has not done this, they may make any recommendation to CSC that they consider appropriate to remedy the situation. CSC must then satisfy the IEDM that they have taken all reasonable steps; if not, the IEDM shall direct CSC to remove the inmate from the SIU.

**5** Pursuant to CSC Guidelines 081-1, an inmate is also entitled to grieve their conditions of confinement while in the SIU.

Transfers

Procedural Safeguards

Conditions of Confinement

Programming, Interventions, Services  
and Leisure

Health Care

## Conditions of Confinement (1 of 3)

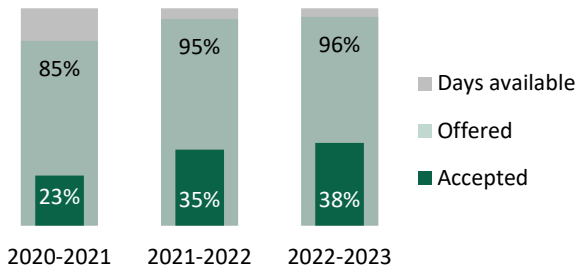
The conditions within the SIU are considered to be better compared to segregation. The key change is the requirement that inmates be provided an opportunity to spend a minimum of four hours outside of their cell and interact with others for a minimum of two hours.

Although inmates were frequently provided with opportunities to be out of their cell and for interaction with others, they were often not accepting these offers.

### Offers of time outside of cell

- Staff and inmates reported that inmates were offered time out of cell more often compared to when inmates were in segregation.
  - According to the LTE-SIU data from April 2020 to March 2023, time out of cell was offered to SIU inmates 92% of the time when such an offer was required by CCRA section 36(1)(a).
    - Women were offered less frequently (87%) than men (92%), and Indigenous inmates were offered more frequently (93%) than non-Indigenous inmates (92%).
  - However, inmates accepted the offer 32% of the time.
    - Women accepted offers more frequently (42%) than men (32%), and Indigenous inmates accepted offers more frequently (40%) than non-Indigenous inmates (25%).

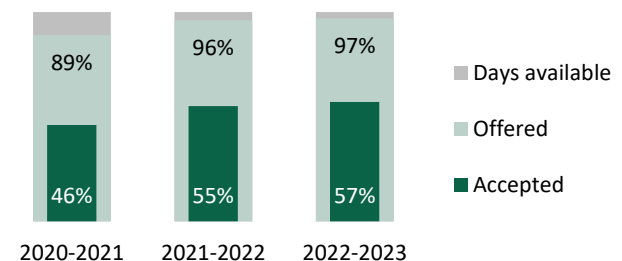
Percentage of days when time outside of cell was offered vs. accepted



### Offers of interaction with others

- According to the LTE-SIU data from April 2020 to March 2023, interaction time was offered to SIU inmates 94% of the time when such an offer was required by CCRA section 36(1)(b).
  - Women were offered less frequently (91%) than men (94%), and Indigenous inmates were offered the same (94%) as non-Indigenous inmates (94%).
- However, inmates accepted the offer 53% of the time.
  - Women accepted offers less frequently (43%) than men (53%), and Indigenous inmates accepted offers more frequently (58%) than non-Indigenous inmates (48%).

Percentage of days when interaction time was offered vs. accepted



### SIU grievances

- Between April 2021 and March 2023, a total of 101 grievances were filed related to conditions of confinement in the SIU. Of those, 9% (9/101) were upheld or upheld in part.

## Conditions of Confinement (2 of 3)

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### Meeting requirements

**Conditions in the SIU impacted inmates' acceptance of opportunities for time outside their cell and interaction with others.**

- Some SIUs are in former segregation ranges which in some cases impacted how staff and inmates viewed the SIU. Some staff noted that the environment is not conducive to rehabilitation, nor does it support wellness.
- Staff indicated in interviews that they were not always able to adequately provide the required time out of cell and interaction with others for various reasons such as inadequate infrastructure, staff shortages or vacancies, institutional routines, and challenges managing incompatible inmates.
- Some institutions have undertaken efforts to make rooms used for outside of cell time more inviting, such as painting the walls and adding items such as televisions and workout equipment.
- Interviews and observations revealed that in some instances, inmates are not accepting offers due to the condition of the rooms being used. For example, some rooms had benches and chairs that are hard and made of metal, which are uncomfortable to sit on for long periods of time. Also, mesh screens used for inmates on barriers, as well as poor ventilation in some rooms makes communication difficult.

**The approach taken by staff to offer activities to inmates impacted an inmate's willingness to come out of their cell and participate in activities.**

- Observations identified that a wide variety of approaches were used by staff to offer time out of cell and interaction time to inmates. There were differences in the tone of the staff members that offered the activities to the inmates, the number of activities that were offered by staff to the inmates, and the time taken by staff to discuss the activities offered to the inmates.
- For some offers, limited information was provided to the inmate about the activity being offered. For example, staff asked the inmate if they wanted "programs" without explaining what that entailed. In some cases, when more information was provided, the inmate changed their mind about not participating or was willing to participate in the initial offer.

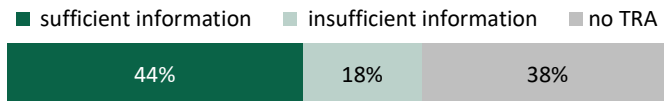
## Conditions of Confinement (3 of 3)

### TRA documentation

The required TRA documentation for inmates subject to barriers (e.g., bars, security glass, door hatches, screens, cell doors, fences, interview rooms, etc.) was not always completed. When a TRA was completed, it did not always contain sufficient information to justify the use of barriers.

- When a barrier was identified as being used, the required TRA as per CD 711 was in place 62% (28/45) of the time for the sample reviewed.
  - 44% (20/45) included sufficient information to justify the use of barriers and identified the risk the inmate presented, while 18% (8/45) did not contain enough information to justify the use of barriers.

Percentage of TRAs by completeness of information



- For inmates who remained on barrier restrictions, a daily TRA was completed 60% (26/43) of the time.
  - However, only 35% (15/43) of the files identified whether the risk the inmate presented still existed.
- The information on whether barriers were used or not was accurately recorded in the LTE-SIU application for 94% (233/248) of the interactions observed during institutional visits.
  - However, for 44% (7/16) of the interactions observed where barriers were used, the inmate did not have a current TRA on file.
- Without a TRA on file, CSC is unable to demonstrate compliance with CCRA section 32(2) that requires that every reasonable effort be made to ensure opportunities for interaction are not mediated or interposed by a physical barrier.
- File review, observations and interviews identified instances where an inmate refused to come out of their cell because they were on barrier restrictions.

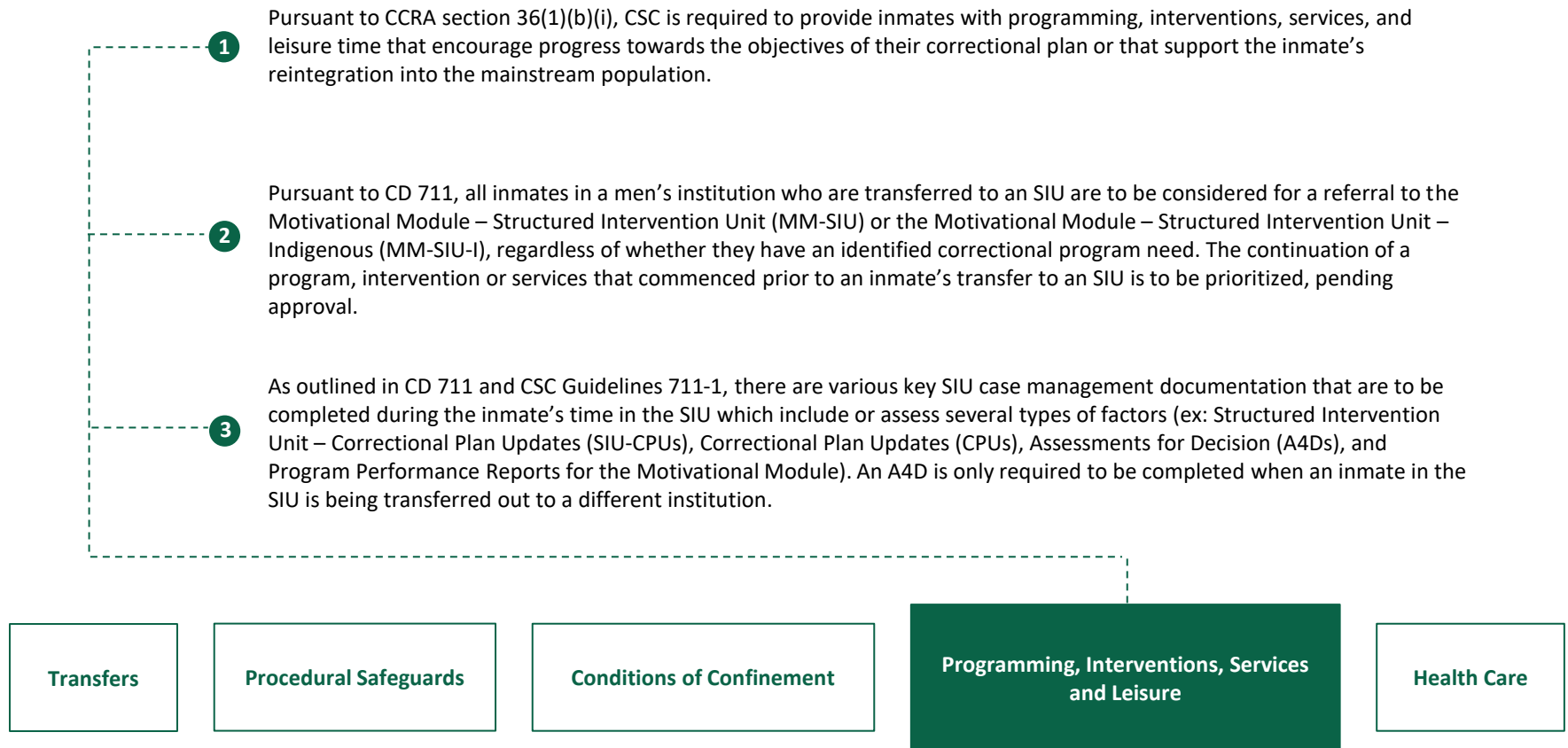
### Responding to IEDM reviews

CSC responded to most IEDM decisions within a timeframe of seven days once the IEDM determined that CSC had not taken all reasonable steps to improve an inmate's conditions of confinement. However, transferring an inmate out of the SIU once the IEDM had directed CSC to do so can take time.

- An analysis of a sample of 119 IEDM reviews that took place between December 2019 and November 2023, due to the inmate not receiving their daily entitlements for a consecutive 5-day period, or 15 cumulative days over a 30-day period, showed that:
  - in 14% (17/119) of the cases, the IEDM, pursuant to their authority outlined in CCRA section 37.83(1), determined that CSC had not taken all reasonable steps for the inmate to receive at least four hours per day outside of cell and two hours of interaction with others;
  - it took a median of seven days for CSC to respond to the IEDM decision;
  - of the cases where the IEDM, pursuant to their authority outlined in CCRA section 37.83(3), determined that CSC had not taken all reasonable steps, the IEDM directed CSC to transfer the inmate out of the SIU 18% (3/17) of the time; and
  - it took a median of 17 days for the inmate to be transferred out of the SIU after the IEDM's decision date.
- An analysis of a sample of 53 IEDM reviews that took place between December 2019 and November 2023, due to the inmate not receiving their daily entitlements for a consecutive 10-day period, showed that:
  - in 15% (8/53) of the cases, the IEDM, pursuant to their authorities outlined in CCRR section 23.06(1) and CCRA section 37.83(3), directed CSC to remove the inmate from the SIU; and
  - it took a median of 39 days for the inmate to be transferred out of the SIU after the IEDM's decision date.
- Delays in the transfer out process impact CSC's ability to fulfill CCRA section 34 "an inmate's confinement in an SIU is to end as soon as possible."

# Overview of Programming, Interventions, Services, and Leisure

An overview of the procedures related to programming, interventions, services and leisure is presented below.





# Effectiveness of Programming, Interventions, Services, and Leisure<sup>1</sup> (1 of 5)

## Outcomes of programming, interventions, and services

Despite the significant amount of financial and human resources that have been allocated to SIUs, programming, interventions, and services in SIUs did not consistently contribute to the successful reintegration of inmates into the mainstream population. There was not always significant progress in addressing inmate's risks and needs while in the SIU, including increasing accountability, engagement, and motivation.

- Approximately 50% of CPOs interviewed perceived the MM-SIU/MM-SIU-I programs (only available at men's institutions) as relatively ineffective. The most cited reasons by CPOs and inmates for their ineffectiveness include:
  - program not tailored to the inmate's needs (i.e., if the inmate is the victim or if the inmate is the subject of an investigation);
  - program not addressing the transfer reason (i.e., issues that led to the transfer to the SIU still need to be addressed such as incompatibles or debts); and
  - programs were repetitive or not effective even if taken multiple times.
- An analysis of administrative data found that 50% (10/20) of inmates who participated in the MM-SIU/MM-SIU-I programs returned to an SIU. These results suggest that the MM-SIU/MM-SIU-I programs are not entirely effective in reducing the likelihood of returning to an SIU.
- A file review of 20 inmate cases that had a program report for MM-SIU/MM-SIU-I found that:
  - 45% (9/20) of program reports documented that the inmate had a better understanding of what led to their SIU placement as a result of participating in the MM-SIU/MM-SIU-I; and
  - 55% (11/20) reported that the inmate transferred out of the SIU prior to completing the modules assigned to them, although there is no requirement in policy that all modules assigned need to be completed.
- A file review of 50 SIU-CPUs found that:
  - 96% (48/50) had an Intervention Plan, but 78% (39/50) did not reference consulting with the inmate on the Intervention Plan; and
  - 74% (37/50) had progress documented, but only 50% (24/48) of SIU-CPUs that had an Intervention Plan documented progress made against the objectives identified in this plan.
- In addition, of the 30 CPUs reviewed:
  - few documented progress against accountability (3%), engagement (7%), and motivation (17%);
  - no progress was documented against reintegration potential; and
  - less than 10% documented a rating change for dynamic factors while in the SIU and in most CPUs, progress made on dynamic factors was not linked to the provision of programming, interventions, and services in the SIU.
    - Most inmates in general have limited change in their risk or need levels from the beginning of their sentence to their release into the community.
- 70% (14/20) of SIU-CPUs for Indigenous inmates with an Intervention Plan had ISH incorporated into them and 71% (10/14) of these Intervention Plans included assignments to cultural interventions to address the inmate's ISH factors and Indigenous-specific needs.

Further definitions can be found in **Appendix A**.

<sup>1</sup> Programs include correctional programs, educational programs, social programs, and vocational programs. Services include religious or spiritual activities and volunteers. Interventions include case management, coaching, immediate support, Indigenous activities, mediation and informal resolution, skills development, staff interaction and intervention. Leisure includes recreation and yard.

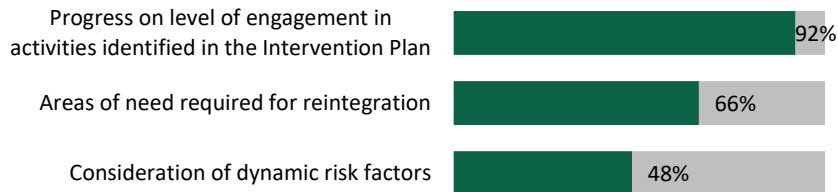
## Effectiveness of Programming, Interventions, Services, and Leisure (2 of 5)

### Documentation issues

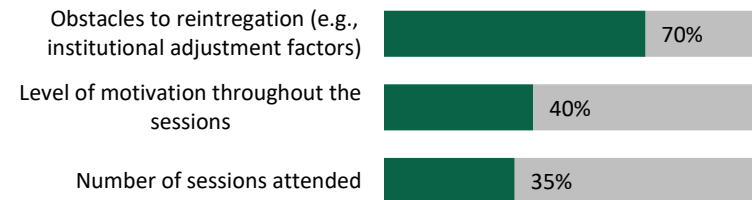
**There was incomplete and insufficient case management documentation, impacting staff and inmate's ability to track progress and plan for programs, interventions, and services; and to develop a plan to effectively manage the inmate in the mainstream population.**

- A review of 50 SIU-CPUs found that:
  - 100% (50/50) of the SIU-CPUs were completed; and
  - some required considerations were not included within the documentation:
- A review of 36 files for inmates who were assigned to the MM-SIU or MM-SIU-I found that:
  - 56% (20/36) of program reports did exist; and
  - of the 20 files where a program report existed, some information was not included within the documentation:

Percentage of SIU-CPUs with missing considerations by type



Percentage of MM-SIU and MM-SIU-I program reports with missing information by type



- A review of assessments for decision (A4Ds) found that:
  - 69% (22/32) did not document the inmate's participation in programs and interventions since their SIU transfer, as required by CSC Guidelines 711-1; and
  - 50% (16/32) of A4Ds had a plan to manage the inmate in the mainstream population, and 46% (13/28) of the A4Ds for an involuntary transfer out of the SIU had a plan to manage the inmate in the mainstream population.

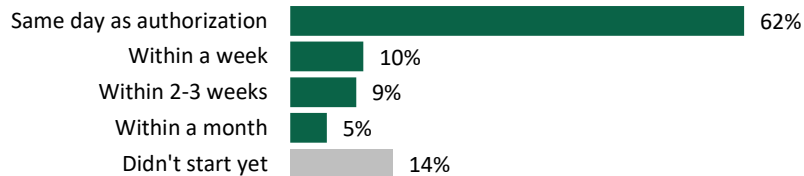
# Effectiveness of Programming, Interventions, Services, and Leisure (3 of 5)

## Access to programming, interventions, services, and leisure

Inmates have more access to programming, interventions, services, and leisure in the SIU compared to the previous segregation model and the mainstream population. Inmates are typically referred to programming, interventions, services, and leisure right away after their transfer.

- Most inmates interviewed at men's institutions stated that they received immediate access to programming, interventions, services, and leisure in the SIU.

### Timeliness of program access upon authorization to an SIU



- A review of SIU-CPUs found that inmates were mostly assigned to the MM-SIU/MM-SIU-I, social programs, and educational programs.

### Percentage of inmates assigned to programs



- According to CCRA section 4(g), CSC is guided by the principle that correctional policies, programs and practices respect gender, ethnic, cultural, religious and linguistic differences, sexual orientation and gender identity and expression. However, staff and inmate interview responses noted a lack of access to programming, interventions, services, and leisure specific to Black and gender diverse inmates while in the SIU. Some inmates also noted challenges accessing programming, interventions, services, and leisure in their official language of choice while in the SIU.

## Access to mainstream correctional programming

There is very limited access to mainstream correctional programming in the SIU. Depending on how long inmates are in SIUs, the limited access results in delays in progress against the inmate's correctional plan.

- Only 12% (6/50) of SIU-CPUs reviewed had documented assignments to mainstream correctional programming.
- Interviewees noted that mainstream correctional programming is often suspended until the inmate is reintegrated into the mainstream population. This delays an inmate's progression against their correctional plan.
- Although it can be a challenge, interviewees noted that some institutions still try to deliver some of the modules from mainstream correctional programs.
  - At some institutions (mainly women's institutions), staff from the mainstream population will continue to work with the inmate during their time in the SIU, or some inmates will attend programming in the mainstream population if it is safe to do so.

## Challenges accessing activities

**Consistent daily access to activities can be impacted by inadequate infrastructure, staff shortages, institutional routines, and challenges managing incompatible inmates.**

- Interviewees noted that the shortage of Elders and Indigenous staff has impacted access to Indigenous activities, including MM-SIU-I, and that having many incompatible inmates in the SIU can impact the facilitation of Indigenous cultural interventions, which are typically intended to take place in a group setting.
- Challenges with inmate movement may also impact the ability to offer some activities (e.g., at some institutions, inmate movement does not occur during medication distribution or deployments of the Emergency Response Team, which can range from minutes to hours; therefore, inmates are not able to be out of their cells during this time).

# Effectiveness of Programming, Interventions, Services, and Leisure (4 of 5)

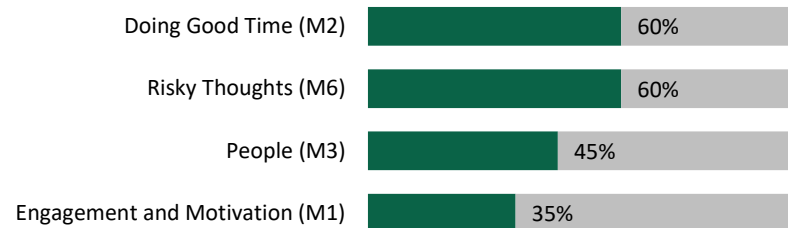
## Inmates' willingness to participate in programming, interventions, services, and leisure

A lack of inmate participation in programming, interventions, services, and leisure time is an impediment to the effectiveness of the SIU model.

- Only 48% of inmates interviewed said that they typically accept offers of programming, interventions, services, and leisure.
- Social, educational, and correctional programs were the types of activity most frequently accepted by inmates.
- Inmates accepted offers for MM-SIU-I (71%) more often than the MM-SIU (65%), as well as other types of programs (63%).
- Staff and inmates noted common reasons why inmates refused to avail themselves of opportunities, including:
  - fear for safety and/or concerns about incompatible inmates;
  - preferring to be alone;
  - not wanting to participate in an activity with a group;
  - weather was too cold or too hot;
  - offer was made too early in the day;
  - mental or physical health concerns;
  - disliking or not believing the activity would be helpful; and
  - dislike or distrust towards the staff member who made the offer.
- Inmates felt that yards are too small, there was a lack of equipment, or were uncomfortable sharing a space with another inmate.

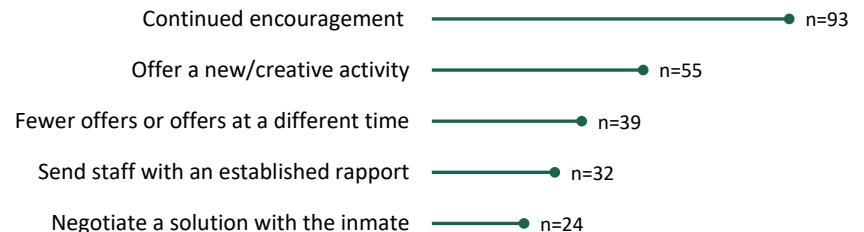
- A review of 20 files found that some modules within the MM-SIU and MM-SIU-I programs were more popular.

Percentage of files in which the module (M) was selected



- Staff interviewees also shared strategies used to encourage inmates to accept offers.

Most cited strategies to encourage inmates to avail themselves for activities (n= number of respondents)



# Effectiveness of Programming, Interventions, Services, and Leisure (5 of 5)

## Programming, interventions, and services

**Staff and inmates highlighted programming, interventions, and services that had a positive impact on inmates in the SIU.**

- Examples included:
  - social programming;
  - cultural interventions from Elders;
  - substance abuse programming (e.g., Wellbriety);
  - Dialectical Behaviour Therapy (DBT);
  - Fit for Life;
  - educational programming and partnerships with post-secondary institutions;
  - skills coaching, vocational training and self-study programs (e.g., Workplace Hazardous Materials Information System (WHMIS), the National Employability Social Program, CORCAN); and
  - programs with a connection to the community (e.g., Dad Hero Program, therapy dogs, John Howard Society).

“ We are offering a computer program that provides micro-credentials, employability and life skills. The offenders can start courses and pick up where they left off, it's beneficial, it can help boost their confidence to go out and get a job. ”

– Staff

“ Our education has been wonderful, and inmates are happy to participate in education and we have had quite a few graduates. ”

– Staff

## Additional programming, interventions, and services

**Staff and inmates suggested additional programming, interventions, and services that could be offered at their institution to support inmates in the SIU.**

- Examples included:
  - hobby training;
  - physical education;
  - culturally relevant support programming;
  - a program or module to introduce the SIU;
  - additional substance abuse programming (e.g., Alcoholics Anonymous, SMART recovery);
  - community integration programming and life skills training;
  - additional vocational and skills training and certification programs;
  - mental health or behavioural programming (e.g., anger management); and
  - spiritual and religious programming.

“ [Institution] was good too. They offered schooling there. At [Institution] I got my GED with the teacher, they were also looking to do night school so that people could do programs during the day and school at night. ”

– Inmate

# Overview of Health Care

An overview of the procedures related to health care is presented below.

**1**

Pursuant to CCRA section 37.1(1), CSC must ensure that measures are taken to provide for the ongoing monitoring of the health of inmates in an SIU. This is done through daily visits and health assessments.

**2**

Pursuant to CCRA section 37.1(2)(b), CSC is to ensure a visit to the inmate at least once every day by a registered health care professional. As per CD 711, the visit must include a visual observation, without physical barriers, of the inmate, unless due to exceptional circumstances, such observation would jeopardize the security of the institution or the safety of any person.

**3**

Pursuant to CD 711, inmates are to be provided with an assessment of their health, including mental health, by a registered health care professional within 24 hours of the inmate's authorized transfer to an SIU and every 14 days from transfer to an SIU. A mental health assessment will also be completed no later than the 28th day from the authorization to transfer to the SIU. As referenced in CCRA section 2(1), the mental health assessment must be conducted by a medical professional with recognized specialty training in mental health diagnosis and treatment, such as a psychiatrist, psychologist or psychiatric nurse or a primary care physician who has had psychiatric training.

**Transfers****Procedural Safeguards****Conditions of Confinement****Programming, Interventions, Services  
and Leisure****Health Care**

# Effectiveness of Health Services (1 of 4)

## SIU population mental health overview

Between April 2020 and March 2023, approximately 30% (134/440) of inmates had a mental health need identified prior to their transfer to the SIU.

- Women were more likely to have a mental health need identified prior to transfer compared with men (67% vs 29%).
- Hispanic (36%), Indigenous (35%), and Caucasian (31%) inmates had higher proportions of identified mental health needs than Asian (20%), Black (17%), Multiracial (16%), and other racial groups (14%).

**Inmates with an identified mental health need spent slightly more time in the SIU than those who did not have a mental health need.**

- Amongst inmates with an identified mental health need:
  - inmates with a rating of considerable or higher needs on the Mental Health Needs Scale (MHNS) <sup>1</sup>, on average, spent around four days less than those with a rating of some need (23 days vs 27 days);
  - Indigenous inmates, on average, spent slightly more time in the SIU in comparison to other racial groups (Indigenous – 29 days, Black – 25 days, White – 22 days); and
  - Women, on average, spent fewer days in an SIU than men (5.5 days vs 27 days).

**The wellbeing of inmates in the SIU is being monitored through various practices.**

- Practices include:



Review of reports and case documentation



Daily interactions and IH visits



Consultation with other staff



Observation of inmates' behaviour, appearance and environment



Tracking inmates refusing to avail themselves for time out of cell and meaningful interaction

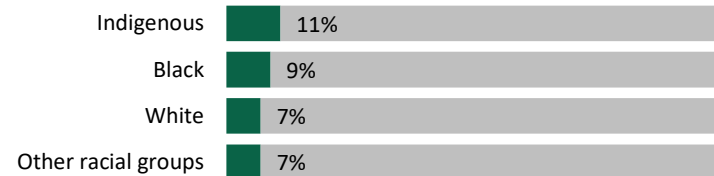


Mental health assessments and daily health care visits

**Indigenous and Black inmates experienced a slightly higher deterioration in mental health during their time in the SIU when compared to White inmates.**

- Although the proportion varied over the years, according to April 2022 to March 2023 HARS data, 9% (147/1,645) of inmates had a negative change in their mental health need during their time in the SIU.
  - The majority of those with increasing needs in the SIU did not require care beyond the services that were already provided within the SIU and therefore did not require more intensive services (either intermediate or inpatient).

### Percentage of inmates with a negative change in mental health



- Some interviewees explained that the experience of the SIU can worsen the mental health of inmates with previously identified mental health needs.
- Some inmates reported a deterioration in their mental health and experiencing feelings of isolation, depression, anxiety, anger, or frustration following their transfer. This deterioration can manifest as extreme weight loss, self-harm, or violent behaviour.

**Despite the mental health challenges of the SIU population, interviewees noted some positive impacts on the inmate's well-being. For some inmates, the SIU can be a constructive environment and positively impact their mental health.**

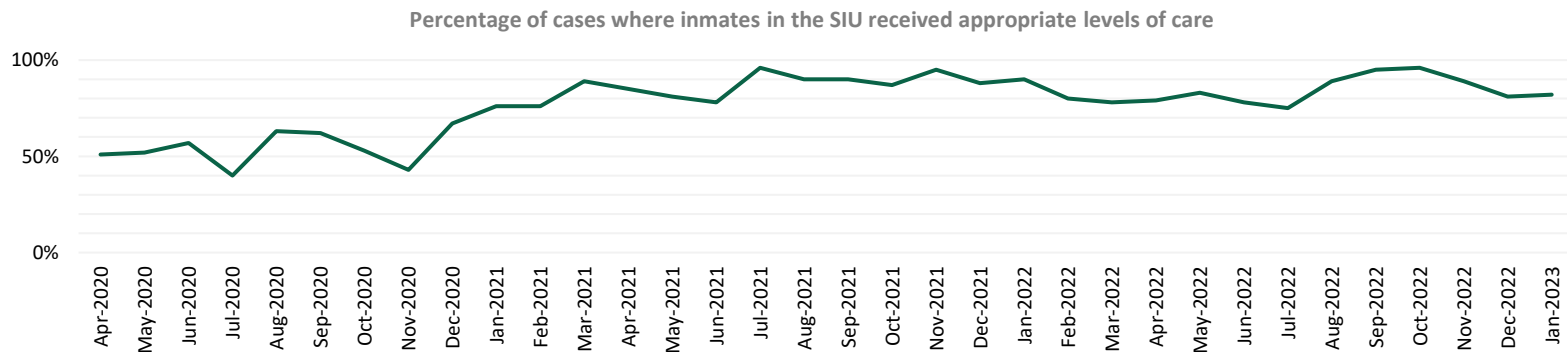
<sup>1</sup> A definition for the Mental Health Needs Scale can be found in **Appendix A**.

## Effectiveness of Health Services (2 of 4)

### Health intervention and reintegration support

**Health interventions in the SIU are perceived as having little to no impact in supporting inmates' reintegration to the mainstream population.**

- Some staff and inmates interviewed did not perceive the health services received in the SIU as being a contributor to an inmate's reintegration, but rather as a service to be provided if needed.
- The perceived effectiveness of health interventions in supporting inmates in the SIU with their reintegration to the mainstream population increases when:
  - inmates participate in their assessments;
  - the health care team is well integrated and coordinated in the SIU with the rest of the case management team;
  - there is the provision of ongoing support and care to inmates, particularly mental health care;
  - effective treatment plans are developed that tailor to the inmates' needs and risks; and
  - inmate needs are not as complex.
- The quality of care<sup>1</sup> review conducted by Health Services at NHQ identified that the quality of care for inmates in an SIU was mostly rated as appropriate, despite these perceptions of the effectiveness of health interventions in the SIU. As well, with increased oversight by Health Services at NHQ, the overall appropriateness of care and documentation has improved over the years.
  - A minority of inmate cases were considered as having major or minor quality of care or documentation issues<sup>2</sup>.
    - Issues were mostly related to assessment, documentation, and response to referral.
    - For example, due to the mental health or health assessments not being completed, providing insufficient details, or being repetitive.



<sup>1</sup> A definition for the quality of care review can be found in **Appendix A**.

<sup>2</sup> Appropriateness of care was rated as appropriate (the quality of care and documentation is appropriate to the inmate's needs); minor (there are minor issues regarding the quality of care or documentation, yet not directly affecting the needs of the inmate); or major (there are significant issues directly affecting the needs of the inmate).

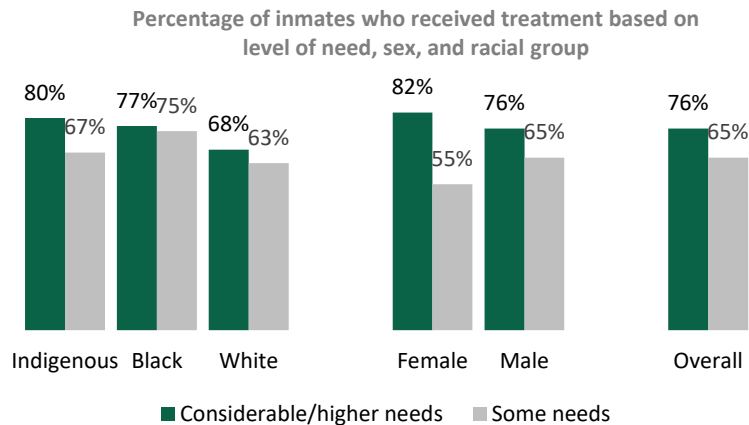


## Effectiveness of Health Services (3 of 4)

### Provision of health services

**Between April 2020 and March 2023, over two thirds of inmates with an identified mental health need received access to mental health treatment while in the SIU. There were varying levels of access for certain groups.**

- 68% (1,107/1,619) of inmates with an identified mental health need received treatment, regardless of level of need.
  - The proportion of inmates receiving treatment increased slightly over the years.
- Some groups received treatment at higher rates such as:
  - inmates with considerable or higher needs rating on the MHNS scale compared to inmates with some needs;
  - women compared to men; and
  - Indigenous inmates (with high/considerable need) and Black inmates (with some need) compared to White inmates.



### Inmates have more access to health services while in the SIU.

- Most of the inmates interviewed reported having more (42%) or equal (26%) access to health care services in the SIU compared to the mainstream population. Many attributed the increased access to the daily health care visits, which are required as per CCRA section 37.1(2)(b).
- Through a review of LTE-SIU data, evidence could be located 91% of the time (858/940 days) to demonstrate that the daily health care visit took place.
  - As daily health care visits generally only take place once per day, there is a risk that inmates may not have an opportunity to meet with them if they are transferred in or out of the SIU before or after the daily visit. If first day and last day of SIU placement are removed from the results, evidence could be located 95% of the time (892/940 days) to demonstrate that the daily health care visit took place.

### Health care assessments were generally completed at the correct interval by an individual with the appropriate qualifications, with some exceptions.

- A detailed review of a sample of inmate files found:
  - 98% (49/50) of the 1-day assessments on file for the sample, of which 96% (47/49) took place at the correct interval;
  - 100% (186/186) of the 14-day assessments on file for the sample of inmates, of which 86% (160/186) took place at the correct interval; and
  - 96% (48/50) of the 28-day assessments on file for the sample of inmates, of which 87.5% (42/48) took place at the correct interval.
- Further, the 28-day mental health assessments must be completed by an individual with the appropriate qualifications as defined within the CCRA. This requirement was fulfilled for 90% (43/48) of the 28-day mental health assessments reviewed.

## Effectiveness of Health Services (4 of 4)

### Critical challenges

#### Over half of SIU inmates refuse to participate in health assessments.

- Inmates refused to participate in health assessments 63% (10,356/16,384) of the time.
  - Fewer women refused to participate (22%, 43/195) than men (64%, 10,313/16,189).
  - A higher proportion of Black inmates refused to participate.

Percentage of inmates who refused to participate in health assessments by race



#### Inmates refuse to participate in health assessments for many reasons.

- Interviewees noted the following reasons:
  - inadequate infrastructure (e.g., lack of rooms to conduct assessments, distance from SIU to health care unit);
  - lack of coordination of health care visits;
  - privacy concerns (e.g., lack of a private setting); and
  - time of day.

#### The limited participation in health assessments, in addition to other factors, impact the effectiveness of health care in SIUs.

- Most interviewees deemed that health assessments were somewhat to rarely effective, and the effectiveness was dependent on factors such as:
  - willingness of inmates to participate;
  - ability to tailor treatment plans to needs and risks;
  - if information from the assessment is communicated to other staff (when relevant); and
  - completeness and timeliness of treatment plans.

#### Different approaches were observed regarding daily health care visits and the quality of these visits varied due to multiple factors.

- Because of the complex profile of the SIU population, some institutions have taken specific approaches to the daily visits; for instance, open door, closed door, or behind barrier. However, not all of these approaches are in alignment with policy which states that visits are to take place without physical barriers unless under exceptional circumstances.
- The quality of the daily health care visits varied due to factors such as the length of the visit, staff's level of engagement with the inmates, and the physical proximity between the staff and the inmate.
- There is some guidance on the expectations regarding daily visits within the CSC Mental Health Guidelines. However, it is not referenced directly within CD 711, increasing the risk that not all staff are aware of the existence of this guidance.
- As well, there are no health care resources exclusively assigned to the SIU and the number and type of health care staff providing services to SIU inmates was inconsistent across institutions. This affects familiarity with expectations regarding the approach to the daily visits.

#### The observed inefficiencies in processes and the variations in interactions impact the overall effectiveness of health care for inmates in the SIU.

- If visits are taking place with physical barriers or if health care is not having a discussion with the inmate, health care may not be able to properly assess the inmate's current state and identify day-to-day changes in their overall health.
- In addition, inmates may also be less willing to communicate with health care staff when it is through a barrier as it removes the personal element of the interaction.



# Oversight and Performance

# Monitoring and Reporting (1 of 2)

## Accuracy of LTE-SIU information

Information recorded in the LTE-SIU application did not always accurately represent interactions in the SIU and not all interactions taking place were recorded in the LTE-SIU. This impacts the ability for CSC to demonstrate efforts to work with inmates.

- CD 711 outlines that the time an inmate spends out of their cell and the time they engage in meaningful human contact must be documented in the LTE-SIU application. However, 23% (76/331) of interactions observed while visiting the institutions were not recorded in the LTE-SIU. Of those that were recorded in the LTE-SIU, the information aligned with the interaction observed only 62% (159/255) of the time.
  - There is inconsistency in how staff determine which interactions are recorded, what should be recorded, what is meant by meaningful interaction, and who is inputting entries into the LTE-SIU.
    - At the same institution, a staff member said they would record all interactions in the LTE-SIU because even a two-minute conversation might make a difference, while another staff member believed that if a conversation was less than five minutes there was no point in entering that interaction into the LTE-SIU.
    - Some institutional staff indicated that the responsibilities for entering information into the LTE-SIU were not clearly documented, nor did they understand the extent or level of detail they had to document.
  - The SIU can get very busy due to multiple inmates participating in activities at the same time. At times, staff were delayed in inputting their entries into the LTE-SIU. Other times, staff were having to enter information about interactions on behalf of their colleagues based on what they were observing from a distance or based on the information they were provided.
    - These types of situations impact the ability to accurately record the exact start and end times, duration, and details of the interaction and lead to a misrepresentation of time out of cell and meaningful interaction for inmates.
  - There are also restrictions within the LTE-SIU application.
    - For example, the LTE-SIU application does not allow for multiple entries to take place at the same time, such as a health care visit taking place during an inmate's yard time. If there is an entry already inputted incorrectly, staff need to move their activity time around which leads to overall inaccuracy within the system as it causes a ripple effect onto other entries.
    - The activity type drop-down options for categorizing an interaction with an inmate are restricted based on the staff member's position. Staff must pick the most fitting choice from the drop down, which may not fully reflect the activity that took place with the inmate.
- “ Sometimes the documentation in the LTE isn't accurate and doesn't provide enough information to tell the story. ”  
– Staff

## LTE-SIU interaction information

**When interactions were entered in the LTE-SIU, the activity type selected by the staff member was generally found to be reflective of the interaction taking place; however, specific details of the interaction that took place were often missing from the additional notes section.**

- There are multiple systems where staff can record information for inmates (ex: OMS, LTE-SIU), but these systems are not integrated.
  - Some staff felt this was a duplication of effort and redundant. When staff put detailed information in an OMS casework record and do not put in the same effort when documenting in the LTE-SIU, this results in poor quality of information within the LTE-SIU interaction details.

## Monitoring and Reporting (2 of 2)

### LTE-SIU reason for refusal

**Specific information for the reason the inmate refused an offer were not always documented in the notes of the LTE-SIU.**

- Per CCRA section 37(2), “CSC should maintain a record of every instance the inmate refused, indicating the specific opportunity and any reason given for the refusal.” A review of LTE-SIU data found that the pre-populated generic options were almost always completed but did not provide additional information on the specific reason the inmate was refusing and, in some cases, did not align with the reason written in the notes.
- Additionally, some descriptions in the notes were unclear, making it challenging to determine if it was the staff member’s assessment of the situation or the inmate’s response.
- As a good practice, some institutions within the Quebec Region used a specific structure to write their notes in the LTE-SIU application when an inmate refused to participate in an activity. They identified the staff member who made the offer, the length of time of the proposed activity, the inmate’s reason for refusal, the methods used to encourage the inmate to participate, and the alternative activities that were offered to the inmate.

### Improvements are being made to increase the quality of LTE-SIU information.

- There is recognition that improvements are required related to the quality of the LTE-SIU information.
- Measures have been put in place since the initial implementation of the SIUs, such as data review by Correctional Managers and SIU Data and Activity Coordinators.
- Additionally, when interactions need to be adjusted, follow-ups with staff are done to make the required changes.

### Monitoring SIU information

**Information obtained through monitoring processes are used to inform decision-making and improve SIU processes and operations. This is taking place at all levels of the organization.**

- IHs, AWIs, SIU managers, CMs, SIU Data and Activity Coordinators, and COs are responsible for collecting, analyzing, and monitoring SIU-related information.
- Through monitoring the information available, CSC compares current trends and results with prior periods to assess performance.
- Institutions use real-time data to target certain inmates for program offers and identify best practices with the goal of increasing the overall inmate’s acceptance of offers.
- Institutions also use what they learn through monitoring processes to focus on the areas where a need for improvement has been identified. Information and training is also provided to staff on how to make improvements to areas such as:

Data collection

Completeness and  
accuracy of LTE-  
SIU and OMS  
information

Timeliness of  
certain reviews  
and associated  
documentation

# Measuring Performance (1 of 2)

## Performance indicators

While there is a performance measurement framework in place for SIUs, the performance indicators in place are limited and do not account for the complexity of inmates in the SIUs.

- CSC currently reports on two SIU-related performance indicators in the Departmental Results Framework.

### Percentage of successful transfers out of SIUs

- CSC only met its current target range in 2021-2022.

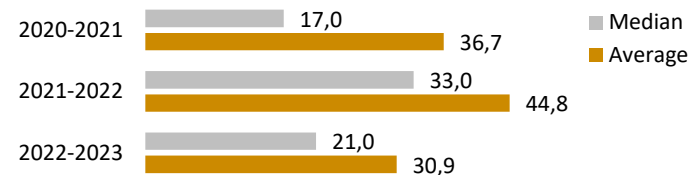
Percentage of successful transfers out of SIUs  
(CSC's target range: 61.9% to 70%)



### Median number of days spent in SIUs

- CSC met its target range in 2020-2021 and 2022-2023.

Average and median length of stay in the SIU  
(CSC's median target range: 15.1 to 24.9)



The performance indicators adopted do not reflect the challenges in having inmates successfully reintegrate into the mainstream population.

- A large number of inmates experience multiple transfers to the SIU.
  - 47% of inmates in the sample experienced two or more SIU transfers.
  - 2.1 was the average number of transfers per inmate.
  - 33% of inmates with subsequent transfers returned after 120 days.
- Interviewees identified challenges with reintegration, such as:
  - inmate issues with behaviour in the mainstream population;
  - inmate escalating or continual violence or threats;
  - inmate fear or concern for their safety and security;
  - unavailability of a reasonable alternative placement; and
  - SIU's perceived attractiveness.
- Interviewees noted concerns with the effectiveness of the SIU model, such as:
  - some inmates could benefit from staying longer in the SIU to receive interventions that will address their needs and risks, conflicting with the expectation that an inmate's confinement in an SIU is to end as soon as possible; and
  - performance is highly dependent on the inmate's willingness to engage and take accountability for their behaviour.
- There is a perception that the SIU model may be ineffective for some sub-populations of inmates.
  - For example, inmates who have very high mental health needs, are extremely violent, do not want to integrate, or prefer isolation. It was referenced that some of these inmates are transferred from institution to institution to try and reintegrate them into a mainstream population, but their behaviours have not changed.

## Measuring Performance (2 of 2)

### Measuring outcome-based performance

CSC monitors performance measures that are primarily focused on compliance. There are a few outcome-based measures of performance.

- In addition to the SIU-related performance indicators in the Departmental Results Framework, CSC monitors:
  - percentage of days inmates housed in SIUs were offered time out of their cell;
  - percentage of days inmates housed in SIUs were out of their cell;
  - percentage of days with interaction time offered to inmates housed in SIUs;
  - percentage of days where interaction time was availed by inmates housed in SIUs;
  - percentage of accepted offers of interventions in SIU; and
  - median number of days from decision to transfer an inmate out of the SIU to the actual transfer.
- Interviewees emphasized that there is a heavy focus on showing compliance with legislative requirements and using quantitative data. It was believed that this does not reflect other relevant aspects of performance that take into consideration an inmate's progress and/or "small wins" in the SIU and that recognize the efforts of the staff working with the inmates in the SIU.

“ There are some people that never want to leave the SIU. But gently we work with them to get them to slowly reintegrate or try to get them to medium security. There are inmates who never come out of their cell. If we slowly get them to come out and interact, that is a success. ”

– Staff

- Examples of small wins and success stories shared by interviewees were related to:

A staff member building a rapport with an inmate

An inmate who previously refused to engage deciding to converse with a staff member

An inmate being able to remain in the mainstream population for longer after each SIU transfer out

An inmate developing the tools and skills required to change behaviours

Introducing new types of staff and volunteer programs within the SIU

- When there are differing views of what a success would be in the SIU and when these other relevant aspects of performance are not taken into consideration as part of performance measures, staff motivation is impacted, as some inmates are not able to meet the identified expectations.

“ They have worked with me to better myself. Staff creates a rapport, better environment. Offer you a lot here. Need younger people to work here. Willing to work with me, want us to work on something. The person I have turned into because of the SIU is different. I think things through more. ”

– Inmate





# Conclusions and Recommendations





# Overall Conclusions

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## Compliance

Concerns were noted regarding the existence, accuracy, and level of detail of information in the LTE-SIU application and SIU-associated documentation, and evidence was not always available to support that CSC complied with relevant legislation and policies related to SIUs.

## Effectiveness/Performance

The effectiveness of the SIU in meeting inmate-specific needs is varied, largely dependent on the inmate's level of accountability and willingness to engage in the programming, interventions, and services offered to them.

While the SIU model provides an increased level of timely access to programming, interventions, and services, challenges remain, such as:

- access to mainstream correctional programming;
- the applicability of the MM-SIU/MM-SIU-I for some inmates; and
- consultation with Elders, ILOs, and spiritual advisors.

There are also challenges maintaining institutional safety and security in the SIU.

## Efficiency

Despite the significant amount of financial and human resources that have been allocated to SIUs, CSC is falling short of achieving its objectives in responding to inmate risks and needs and contributing to the successful reintegration of inmates into the mainstream population.

CSC faces challenges in operationalizing the SIU model due to:

- the contradiction between the SIU objectives of providing programming, interventions, and services aimed at changing behaviours and the expectation that inmates be transferred out of the SIU as soon as possible;
- staff vacancies and turnover; and
- insufficient and improper infrastructure and equipment.

## Management framework

CSC has implemented a management framework for SIUs; however, areas for improvement have been identified. These include:

- clarifying and developing key elements of the policy framework, governance structure, and roles and responsibilities;
- establishing rigorous processes for tracking and monitoring resource allocation; and
- reviewing CSC's SIU performance measurement framework to ensure it is comprehensive and that metrics are sound, accurate, consider the complexities of SIU inmates, and support CSC in reflecting the efforts made by staff with SIU inmates.

## Relevance

SIU objectives are aligned with CSC's mandate, policies, corporate priorities, and lessons learned from the previous segregation model.

SIU objectives further complement broader federal priorities of public safety and humane treatment.

There are notable differences between men and women's institutions in the operationalization of the SIU model. Inmates at women's institutions:

- experience fewer transfers to the SIU;
- spend less time in the SIU;
- have a higher prevalence of mental health needs;
- have access to alternative options not available at men's institutions; and
- benefit from the work of the interdisciplinary team within the Intensive Intervention Strategy Framework.

## Recommendations

**Recommendation 1:** The Assistant Commissioner, Correctional Operations and Programs, in collaboration with the Senior Deputy Commissioner, should ensure that the CSC SIU objectives within a multidisciplinary context are clearly articulated; and that the performance measurement framework in place for the purposes of monitoring compliance and results is reviewed to include key performance indicators that are outcome-based and capture the complexity of inmates in the SIU environment. SIU human and financial resource allocations should also be accurately captured and documented to support decision making and reporting.

**Management Response/Position:** ☒ Accepted ☐ Accepted in Part ☐ Rejected

**Management Response:** CSC acknowledges that clear objectives for Structured Interventions Units (SIUs) aligned with the policy framework support in achieving the objectives of SIUs. It is also acknowledged that CSC faces the challenge of balancing the need to provide inmates with programs and interventions that support behavior change and safer institutions, while doing so under the dichotomous legislative requirement to also return SIU inmates to a mainstream population as soon as possible. Defining objectives and approaches in responding to varied offender profiles will facilitate aligning organizational multidisciplinary efforts.

To address this challenge, several actions are identified in this MAP that address all five (5) recommendations, including identifying clear SIU objectives, a renewed SIU policy suite, a review and addition to Key Performance Indicators (KPIs), and an analysis allocation of human and financial resources to inform decision making. More specifically, the revised draft SIU policy suite includes added accountabilities for the Assistant Commissioner, Correctional Operations and Programs (ACCOP) to ensure processes are in place related to data collection, quality assurance and reporting, as well as human and financial resource allocations. This will ensure oversight and ongoing improvement of the SIU performance. Additionally, CSC continues to update the SIU-LTE application to ensure improved user functionality and data entry, leading to more accurate performance data and compliance measurement.

Finally, CSC has commenced the development of a SIU Strategic Plan that will focus on strengthening the foundation of SIUs, while laying the groundwork for the future. The SIU Strategic Plan is informed by an evidence-based approach, synthesizing findings from the current Joint Audit and Evaluation, with other external and internal reports on SIUs, such as the research report, A Multi-Site Field Study of CSC's Structured Intervention Units (SIUs): Challenges and Opportunities.

Please see recommendation number 5 for actions specific to performance indicators.

## Recommendations

Deliverable(s)	Accountability	Timeline for Implementation
The SIU objectives will be identified within the SIU Procedures Manuals and within various other SIU communications products.	ACCOP / Assistant Commissioner, Policy (ACP)	2025-06-30
Added accountabilities for the ACCOP to ensure processes are in place related to data collection, quality assurance and reporting, as well as human and financial resource allocations.	ACCOP / ACP	2025-05-30
An analysis of SIU human and financial resources will be completed.  The resource allocation to NHQ will be reviewed. How allocation is utilized and their outputs in supporting SIUs documented. Positions supporting the SIU model that are not funded will be outlined.	ACCOP / Assistant Commissioner, Corporate Services (ACCS)	2025-11-30
Deliver the next launch of the SIU-LTE Application (1.14).  Staff information sessions on the changes occur to ensure staff are aware of the changes to the SIU-LTE application.	ACCOP / Chief Information Officer (CIO)	2025-05-30
Engage in and document organizational discussions on circumstances where a longer SIU transfer meets the spirit of as soon as possible. Define the SIU model objectives for these cases.  Document and learn from cases that had a longer SIU transfer, improved engagement in the SIU regime, and a longer-term mainstream integration period.	ACCOP	2025-11-28
Establish an SIU Strategic Plan.	ACCOP	2025-09-30

## Recommendations

**Recommendation 2:** The Assistant Commissioner, Correctional Operations and Programs, as part of its ongoing policy framework review exercise, should ensure that all SIU-related policy instruments and guidance documents are aligned with the CSC SIU objectives; and that employee roles, responsibilities, and expectations are clearly articulated and understood.

**Management Response/Position:** ☒ Accepted ☐ Accepted in Part ☐ Rejected

**Management Response:**

CSC acknowledges that effective SIU management requires SIU policy instruments that are clear. Consistent policy allows for staff to understand their roles and responsibilities and support efficient service delivery within SIUs. In support of this, CSC will promulgate a renewed SIU policy suite and SIU procedures manuals that clarifies staff roles and responsibilities. We will also establish communication and information-sharing channels to socialize SIU policy with staff to support congruence between SIU policy and its application at the regional and site levels.

To ensure the renewed SIU policy suite meets the intended objectives of clearer staff roles and responsibilities, Compliance and Operational Risk Report (CORR) tools will continue to be utilized.

In addition, in conjunction with Learning and Development (L&D), formal SIU training is currently in development. It will support staff in understanding their and their colleagues, roles and responsibilities in SIUs.

Deliverable(s)	Accountability	Timeline for Implementation
Promulgation of SIU policy suite, which will include a Commissioner's Directive, Guidelines, and Procedural Manuals.	ACCOP / ACP	2025-05-30
Virtual town halls will occur to communicate SIU policy changes to staff.	ACCOP	2025-05-30
SIU CORR verification tools will be developed to test the new SIU policy framework.	ACCOP / ACP	2026-03-31
Completion and launch of a pilot of SIU learning modules. Topics include applying the SIU mandate and establishing and maintaining a multidisciplinary approach.	ACCOP / Assistant Commissioner, Human Resource Management (ACHRM)	2025-11-28

## Recommendations

**Recommendation 3:** The Assistant Commissioner, Correctional Operations and Programs, while considering safety, security, and cost, should review the infrastructure and equipment in place within SIUs to determine whether enhancements or improvements should be made to support the achievement of SIU objectives.

**Management Response/Position:** ☒ Accepted ☐ Accepted in Part ☐ Rejected

**Management Response:**

CSC acknowledges that the infrastructure of each SIU varies in the number of yards, internal leisure or recreation areas, program rooms, interview rooms, common rooms, staff offices, etc. Although several SIU sites have purchased various equipment for SIUs, it has so far been left to each site to determine their own needs, allowing for inconsistencies in the availability of equipment in SIUs. These differences are managed operationally by each site, including having practices in place to maximize opportunities for inmate engagement via daily routines and efficient time/space management and movement strategies. CSC will focus on leveraging existing space and short-term enhancements.

CSC is developing national standards for secure interview and meeting spaces. Once approved, a review of existing SIU facilities will be completed against the established standards and any deficiencies will be submitted as part of the National Call Letter process for inclusion in the regional and/or national Program of Work. In addition, the SIU Strategic Plan will include a focus on infrastructure and SIU environments.

Deliverable(s)	Accountability	Timeline for Implementation
Standards will be published.	ACCS / ACCOP	2025-11-28
Information sheet outlining existing multifunction rooms and is distributed nationally.	ACCS / ACCOP	2025-11-28
An equipment information sheet for SIUs outlining existing equipment availability within different SIUs is distributed nationally.	ACCS / ACCOP	2025-11-28
Establish an SIU Strategic Plan.	ACCOP	2025-09-30

## Recommendations

**Recommendation 4:** The Assistant Commissioner, Correctional Operations and Programs should re-examine the access to, and delivery of correctional interventions for inmates in the SIU to ensure that interventions are meeting SIU objectives.

**Management Response/Position:** ☒ Accepted ☐ Accepted in Part ☐ Rejected

### Management Response:

The joint audit report showed that offenders have more access to programming, interventions, services, and leisure in the SIU compared to the mainstream population. Additionally, the report demonstrated that offenders are typically referred to programming, interventions, services, and leisure right away after their transfer. As per Interim Policy Bulletin 690 for Commissioner's Directive - 711 Structured Intervention Units, all inmates transferred to an SIU are assessed to determine the most appropriate correctional intervention required to address their specific needs while in SIU. The Motivational Module Structured Intervention Unit (MM-SIU) is usually the most suitable intervention provided to offenders in SIUs given that it provides offenders with the tools that they require to address the behaviours that led them to their transfer and successfully return and remain in mainstream population. While the report highlighted that MM-SIU does not address the need for offenders transferred to SIU for their own protection, the intervention is in fact designed to address the needs of those offenders. Therefore, we draw the conclusion that intervention staff require additional support and coaching opportunities to better understand the objectives of MM-SIU and improve access to interventions for all offenders, including those transferred for their own safety.

The report also showed that approximately 12% of cases reviewed had participated in their main correctional program while in the SIU. The short stays in SIU combined with the need to address the factors that led to the offender's transfer to the SIU seem to be reflected in that percentage. However, there are opportunities to improve the consistency and effectiveness of Correctional Intervention Boards in SIUs, to enhance cohesion and ensure that interventions are tailored to the offender's needs, i.e., access to main correctional programs for offenders with extended SIU stays. Additionally, in order to further enhance access to interventions, CSC created the Behavioural Skills Coach (BSC) positions in men SIUs in 2022. Since then, a new intervention entitled Behavioural Skills Coaching Intervention (BSCI) was developed and implemented in July 2024. The BSCI is a structured behavioural intervention that will further assist certain inmates on working on maladaptive behaviours that impede their ability to successfully reintegrate and remain in mainstream inmate population. While BSCs were provided with an initial training in 2024-25, CSC will also develop a continuous training and support mechanism to ensure the effectiveness of the BSCIs by end of March 2025. Given the above, CSC agrees that improvements can be made to enhance access to correctional interventions in SIUs to ensure that they meet SIU objectives.

In addition, the SIU Strategic Plan will include a focus on interventions, including areas that impact access to interventions, such as scheduling, routines, and offender groupings.

## Recommendations

Deliverable(s)	Accountability	Timeline for Implementation
Develop the program material for the <i>Behavioural Skills Coaching Intervention</i> and implement the intervention in all SIU men sites.  Conduct initial training for Behavioural Skills Coaches.  Develop a continuous training and support mechanism for Behavioural Skills Coaches.	ACCOP	Completed
Add SIU interventions as an ongoing agenda item at the Regional Program Manager meetings held by NHQ.	ACCOP	Completed
Develop and share communications to improve the understanding of intervention staff and their roles in the SIU, including in the Correctional Intervention Board. This includes best practices on: <ul style="list-style-type: none"><li>• motivating offenders to participate in interventions and/or correctional programs;</li><li>• how and by who offers are made;</li><li>• as well as management oversight.</li></ul>	ACCOP	2025-12-31
Establish an SIU Strategic Plan.	ACCOP	2025-09-30

## Recommendations

**Recommendation 5:** The Assistant Commissioner, Correctional Operations and Programs, in collaboration with the Senior Deputy Commissioner, should develop a data strategy to improve data quality, accuracy, and completeness; and to reduce duplication of data entry.

**Management Response/Position:** ☒ Accepted ☐ Accepted in Part ☐ Rejected

### Management Response:

This response and associated action items also respond to the performance measurement framework component of recommendation 1.

It is acknowledged that meaningful performance analyses requires accurate and sound data structures and recording practices and that this is an area that the joint audit evaluation identifies as a concern. Through Bill C-83, CSC funded positions within the Performance Measurement and Management Results Division and within the Research Branch to focus on SIU results, performance measurement, etc. Further, CSC funded a dedicated team within Information Management Services to develop and maintain an enhanced offender management module (SIU-LTE) specific for recording and reporting on SIU activities.

Since the inception of SIUs, there has been a multi-pronged, evolving scheme of internal and external reporting strategies to shed light on trends and performance related to SIUs. Current reporting strategies include:

- Quarterly public-facing reports on key SIU indicators (PMMR) and basic analysis of trends (Research)
- Internal Power BI reports that provide a visualization of SIU data, updated on a monthly basis (PMMR)
- Quarterly internal analytical reports prepared by Research using datasets produced by PMMR
- Monthly performance-based/trend reports prepared by Research using IT Power BI reports
- Ad hoc research and analytics as requested.

To date, there have been ongoing efforts to enhance the quality of SIU data and establish reporting measures and approaches that are responsive to organizational information need areas so as to promote evidenced-based decision-making. Ongoing enhancements to the LTE have and will continue to occur (action items under recommendation 1). These enhancements are unpinned by the aim of promoting accurate, consistent, and sound recording practices, which allow for meaningful analyses of SIU performance and results.

Since the inception of SIUs, data integrity issues have been identified and solutions implemented. Concern has been raised regarding the lack of outcome-based measures to examine SIU performance. In 2024, CSC established an SIU performance indicator working group (SIU-WG), with members from SIU NHQ, the Policy Sector (Research and PMMR), and other key OPIs to explore the development of outcome-based performance measures using the current data structures. The SIU strategic plan will address longer term outcome-based enhancements which will require changes in data structures.

Further, in 2023, as part of the review of the SIU model, CSC established Data Quality and Activity Coordinator positions to support the effective operation of SIUs, activity coordination and data entry. In consultation with the sites and regions, CSC is committed to developing national standards for these positions to ensure consistency, clarity, and accountability in roles, skills, and practices across the country, which will lead to improved data collection.



## Recommendations

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Deliverable(s)	Accountability	Timeline for Implementation
Develop an initial SIU performance indicator report.	ACCOP / ACP	Completed
Develop a Proof of Concept (POC) in PowerBI.	ACCOP / ACP	2025-06-30
Implement a new performance indicator within the CSC reporting environment.	ACCOP / ACP	2025-11-30
Positions are created in the SIU organization chart and staffed.	ACCOP	Completed
National standards are developed, shared nationally, and implemented locally.	ACCOP	2025-09-30
Establish an SIU Strategic Plan.	ACCOP	2025-09-30



# Appendices



## Appendix A: Glossary (1 of 3)

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- **Assessment for Decision (A4D):** an A4D provides an assessment and recommendation for the correctional decision-making process. It primarily considers offender history, risk assessment and progress. A4Ds are written to support decision-making related to various types of correctional decisions such as release, transfers, security classification and detention referrals. It provides a recommendation for the decision from the case management team.
  - **Correctional Plan Update (CPU):** the main purpose of a CPU is to report on the offender's accountability and progress in meeting their correctional plan's objectives. The update provides a brief overview of the case and is comprised of two sections, which include objectives/expected gains and analysis of current request. Progress against the plan is also rated and the offence cycle is updated if required. Additionally, goals and objectives are updated, which can include healing components.
  - **Dynamic Needs:** refers to the needs of the offender that can be addressed via correctional programming and/or interventions. Needs level is determined by the Dynamic Factor Identification and Analysis which aims to identify and prioritize criminogenic needs according to seven dynamic risk areas (employment and education, marital/family, associates, substance abuse, community functioning, personal/emotional and attitudes) so as to focus correctional intervention on factors that, when appropriately addressed, reduce the likelihood of re-offending. The inmate may be assessed as Low needs – no or few identified dynamic factors (i.e., factors seen as an asset to community adjustment and/or no, low or medium immediate need for improvement), Medium needs (i.e., any combination of dynamic factor severity and number that lie outside of either the low or high guidelines), and High needs (i.e., few identified dynamic factors but rated as high need for improvement or multiple dynamic factors identified.).
  - **Gender-based Analysis Plus (GBA Plus):** an analytical tool to support the development of responsive and inclusive initiatives, including policies, programs, and other initiatives. GBA Plus is a process for understanding who is impacted by the issue being addressed by the initiative; identifying how the initiative could be tailored to meet diverse needs of the people most impacted; and anticipating and mitigating any barriers to accessing or benefitting from the initiative.
  - **Institutional Adjustment:** refers to an inmate's ability to adapt to prison. Indicators of poor adaptation include, but are not limited to, institutional misconduct, escape attempts, and alcohol or drug use.
  - **Intensive Intervention Strategy (IIS):** a management strategy that addresses the risk and needs of inmates who: require additional support and interventions through accommodation in the Enhanced Support House; are classified as maximum security and require additional structure and supervision in the Secure Unit (excluding the Structured Intervention Unit); and/or have mental health needs and require the structure and support provided by the specialized accommodations offered by the Structured Living Environment and the Assiniboine Unit at the Regional Psychiatric Centre in Saskatoon.
- As part of the Intensive Intervention Strategy, inmates residing in the other mainstream residential living accommodations can be provided with support and outreach services via the Structured Living Environment.
- The Intensive Intervention Strategy is a collaborative approach between interventions, operations and Health Services to support the diverse needs of the inmates managed under this strategy.

## Appendix A: Glossary (2 of 3)

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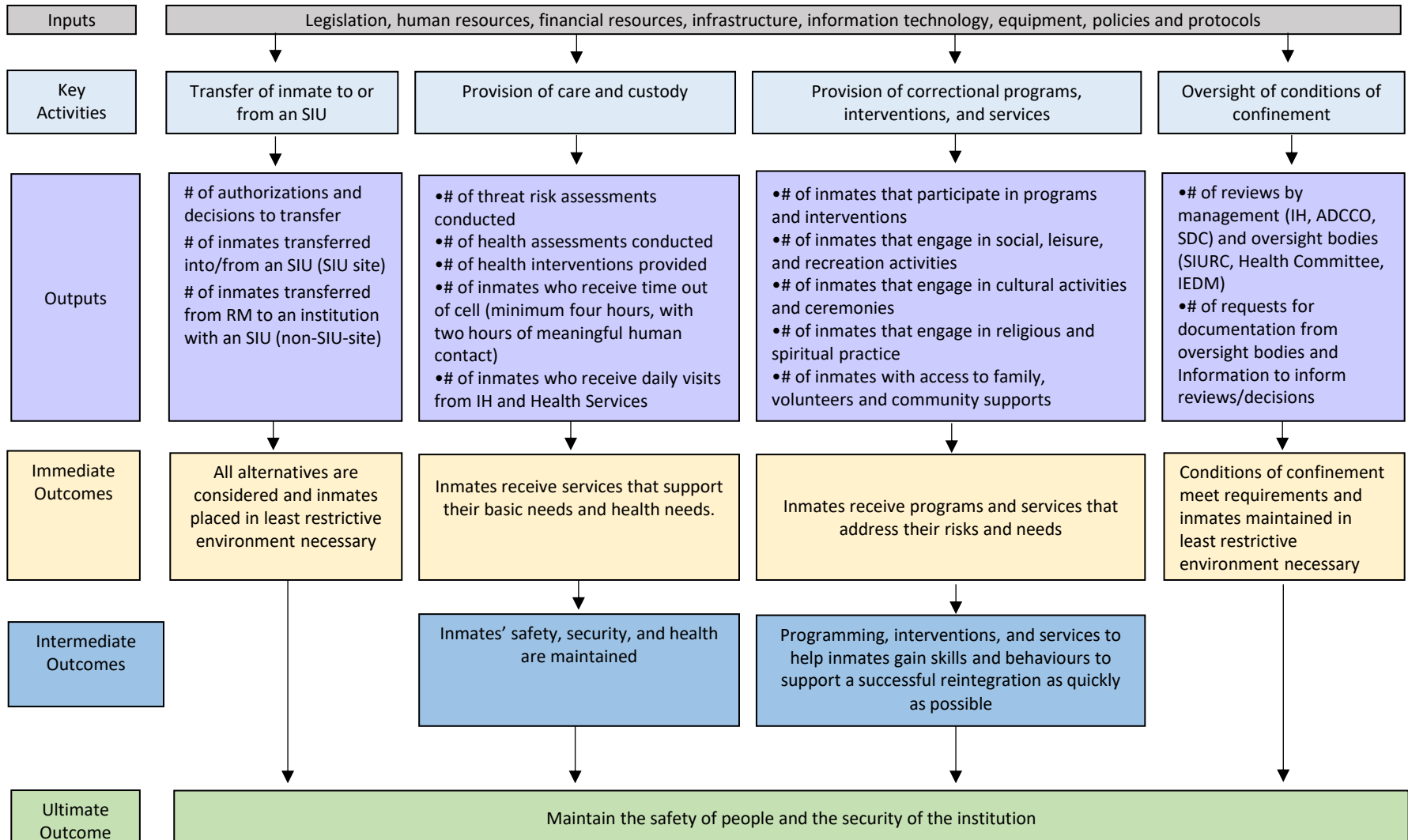
- **Interdisciplinary Team (IDT):** an intervention body chaired by the Manager, Intensive Intervention Strategy, and comprised of the Correctional Manager, Intensive Intervention Strategy, registered health care professionals, Parole Officers, Primary Workers, Behavioural Counsellors, Elders, Indigenous Liaison Officers and/or ad hoc members as required.
- **Mental Health Needs Scale:** The Mental Health Need Scale is an assessment completed by a licensed mental health professional, or mental health staff under the supervision of a licensed mental health professional. The scale consists of three main parts: Part A: Immediate Action Required, Part B: Overall Level of Mental Health Need, Part C: Mental Health Need in Specific Domains of Functioning. A level of need rated as "Considerable or higher" is defined as "mental health needs for which the individual experiences significant impairment in daily functioning/activities due to their mental health. They would be eligible for more intensive health services, including admission to Intermediate Mental Health Care or a Regional Treatment Centre". A level of need rated as "Some" is defined as "mental health needs that can be addressed through primary care, and which do not significantly impair daily functioning. These are often transitory in nature. Examples that typically occur in institutions include support related to grief (e.g., death of a family member or friend), loss of relationships, fear/worry related to situational stressors, or interpersonal conflict".
- **Motivation Level:** the inmate's desire or willingness to change evidenced by their willingness to participate in programming and/or interventions. The domain motivation level is assessed for eight need areas: education, employment, marital/family, associates, substance abuse, community functioning, personal/emotional orientation, and attitude. Inmate may be assessed as High – self-motivated (i.e., actively accepts and addresses problem areas), medium (i.e., may not accept overall assessment, but will participate in programs) and Low – strongly rejects need for change (i.e., unwilling to participate in programs or interventions).
- **Motivational Module – Structured Intervention Unit (MM-SIU/MM-SIU-I):** the purpose of the MM-SIU/MM-SIU-I reports are to assess progress against the program targets in regard to reintegration and institutional supervision. The participant's motivation to reintegrate into mainstream offender population and their ability to learn the skills necessary to remain in the mainstream offender population are assessed. The program is comprised of six modules, which include, Engagement and Motivation (Module 1), Doing "Good Time" (Module 2), Facing the Challenges of Prison "People" (Module 3), Facing the Challenges of Prison "Temptations" (Module 4), Facing the Challenges of Prison "Emotions" (Module 5), and Facing the Challenges of Prison "Risky Thoughts" (Module 6).
- **Operations and Maintenance (O&M):** a combination of general maintenance, management, training, budgeting, and day-to-day activities required to provide service delivery, that are used collectively for the proper functioning of an organization.
- **Quality of Care File Review:** a quality improvement project to monitor the needs of individuals in the SIU's and assess the appropriateness of health care provided.

## Appendix A: Glossary (3 of 3)

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- **Quality of Life Framework:** consists of a set of 84 indicators, organized into a series of domains: prosperity, health, society, environment, and good governance. The Framework also includes two cross-cutting lenses which are applied across all of its domains: the Fairness and inclusion lens and the Sustainability and resilience lens. The Quality-of-Life Framework for Canada aims to measure what matters most to Canadians, to help drive evidence-based budgeting and decision-making at the federal level.
- **Reintegration Potential:** the reintegration potential of the inmate. Determined by consulting the Custody Rating Scale, the Revised Statistical Information on Recidivism (for men), the Static Factor Rating, and the Dynamic Factor Rating (for women). Inmate may be assessed as High – no interventions required (i.e., if interventions required, they should take place in the community services, work placements and education may be used), Medium – institutional correctional programs required or Low – institutional correctional programs required.
- **Security Threat Group (STG):** any formal or informal offender group, gang, or organization consisting of three or more members. STGs may include street gangs, Indigenous gangs, prison gangs, outlaw motorcycle gangs, traditional organized crime, Asian gangs, white supremacy groups, subversive groups, terrorist organizations, and hate groups.
- **SIU Correctional Intervention Board (SIU-CIB):** a multidisciplinary team that approves interventions and contributes to recommendations or decisions for inmates transferred to an SIU, including determining appropriate program referrals and pay levels for inmates. It is chaired by the SIU Manager/MIIS and may include any other staff member who may contribute to the discussion or decision as determined by the Chairperson.
- **Structured Intervention Unit-Correctional Plan Update (SIU-CPU):** the purpose of an SIU-CPU is to ensure that an offender's progress is assessed against the specific objectives identified as part of their Intervention Plan. The SIU-CPU will identify specific objectives for an inmate that will assist in preparing them for successful reintegration into the mainstream population as soon as possible. The CPU-SIU objectives must be Specific, Measurable, Achievable, Realistic and Time-framed (S.M.A.R.T.).
- **Substance Use Need:** refers to offenders who have a problematic relationship with substances use. Assessed as part of the Dynamic Factor Identification and Analysis.
- **Violent Index Offence:** violent offences include, but are not limited to murder, attempted murder, various forms of sexual and non-sexual assault, robbery and kidnapping. The most serious offence leading to a specific sentence is the index offence for that sentence.

## Appendix B: Structured Intervention Units Logic Model



## Appendix C: Audit Objectives and Criteria

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### Objective 1:

**To provide assurance that a management framework is in place to support Structured Intervention Units.**

#### Criteria:

1.1 Policy Framework - Commissioner's Directives, guidelines and other guidance documents are clear, support Structured Intervention Units, and comply with applicable legislation.

1.2 Governance - A defined governance structure is in place to effectively support the Structured Intervention Units.

1.3 Roles and Responsibilities - Roles and responsibilities are clearly defined, documented, communicated and understood.

1.4 Monitoring and Reporting - A systematic, disciplined approach is in place to monitor Structured Intervention Units performance and commitments, and relevant information is being used to inform decision-making at all levels.

1.5 Resources - Infrastructure, equipment and human resources are in place to assist in the effective operation of the Structured Intervention Units.

### Objective 2:

**To provide assurance that CSC is complying with relevant legislation and policies related to Structured Intervention Units.**

#### Criteria:

2.1 Transfer Criteria - Documentation exists to demonstrate that the inmate meets the legislative and Commissioner's Directive criteria to be authorized, to transfer, and to remain in the Structured Intervention Unit.

2.2 Reviews - Structured Intervention Unit reviews are completed within the required timeframes by the appropriate level of authority, and are documented.

#### 2.3 Daily Interactions

2.3.1 The daily inmate interaction requirements have been met and are documented.

2.3.2 The recording of daily inmate interactions is accurate and contains sufficient information to understand the interactions that are taking place.

2.4 Barriers - The required threat-risk assessment documentation has been completed and consistently updated as per the CD 711 when a Structured Intervention Unit inmate is subject to barriers.

2.5 Decision and Information Sharing - Decision sharing and information sharing with inmates is taking place, is documented, and includes all required information.

2.6 Implementation of Recommendations - Reviews recommending a change to an inmate's conditions of confinement are implemented and/or responded to.

## Appendix D: Evaluation Questions

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### Relevance

#### Continued need

- Is there a demonstrable need for SIUs within federal corrections?

#### Alignment with departmental and government priorities

- How do SIU objectives align with departmental priorities and federal government priorities?

#### Alignment with federal government roles and responsibilities

- Do SIUs align with the roles and responsibilities of CSC and the federal government?

### Efficiency

#### Demonstration of efficiency

- How efficient is the SIU model in providing access to programming in the least restrictive and secure environment possible?

### Effectiveness/Performance

#### Achievement of expected outcomes

- Are transfers to and out of SIUs completed in an effective and efficient manner?
- Are SIURCs recommendations effective in ensuring that an inmate's stay in an SIU is as short as necessary?
- Are inmates' health care needs met, including mental health needs as documented by CSC?
- Are inmate-specific needs met through the provision of programs, interventions, and services?
- Are SIUs staffed in a manner that enables CSC to provide the necessary programs, interventions, and services while maintaining institutional safety?
- Are SIUs effective at maintaining institutional safety?

#### GBA plus

- Are there notable differences in the delivery of programs, interventions, services, and outcomes depending on offender's characteristics?

Comparison of performance indicators based on characteristics of offenders such as:

- Sex or gender expression
- Indigenous Offenders
- Black offenders
- Persons with disabilities
- Persons with mental health issues
- Persons with substance use issues



# Appendix E: Evaluation Questions and Audit Criteria Based on Logic Model Components

Evaluation Question	Logic Model Components	Audit Criteria
Are SIUs effective at maintaining institutional safety?	<b>Ultimate Outcome</b>	
Are offenders' health care needs met, including mental health needs as documented by CSC?	<b>Intermediate Outcome</b>	Reviews recommending a change to an inmate's conditions of confinement have been implemented and/or responded to information.
GBA Plus and other considerations - Are there notable differences in the delivery of programs, interventions, services, and outcomes depending on offender's characteristics?		The recording of daily inmate interactions is accurate and contains sufficient information to understand the interactions that are taking place.
Are offender-specific needs met through the provision of programs, interventions, and services?		The daily inmate interaction requirements have been met and are documented.
Are SIURCs recommendations effective in ensuring that an inmate's stay in an SIU is as short as necessary?	<b>Immediate Outcome</b>	Infrastructure, equipment and human resources are in place to assist in the effective operation of the SIUs.
How efficient is the SIU model in providing access to programming in the least restrictive and secure environment possible?		Decision sharing and information sharing with inmates is taking place, is documented, and includes all required information.
Do the objectives of the SIU align with the roles and responsibilities of CSC and the federal government?		SIU reviews are completed within the required timeframes by the appropriate level of authority and are documented.
Is there a demonstrable need for SIUs within federal corrections?		The required threat-risk assessment documentation has been completed and consistently updated as per the CD 711 when an SIU inmate is subject to barriers.
		Documentation exists to demonstrate that the inmate meets the legislative and Commissioner's Directive criteria to be authorized, to transfer, and to remain in the SIU.
	<b>Outputs</b>	A systematic, disciplined approach is in place to monitor SIUs performance and commitments, and relevant information is being used to inform decision-making at all levels.
Are transfers to and out of SIUs completed in an effective and efficient manner?	<b>Key Activities</b>	
Do the objectives of the SIU align with CSC and federal government priorities?	<b>Inputs</b>	A defined governance structure is in place to effectively support the SIUs.
Are SIUs staffed in a manner that enables CSC to provide the necessary programs, interventions, and services while maintaining institutional safety?		Commissioner's Directives, guidelines and other guidance documents are clear, support SIUs, and comply with applicable legislation.
		Roles and responsibilities are clearly defined, documented, communicated and understood.

## Appendix F: Scope and Approach (1 of 2)



**Observation** of 10 institutions to examine SIUs processes and procedures.

Institutional visits were conducted from May to July 2023.

Considerations for selection included whether an institution had an SIU, the number of SIU inmates, staffing levels, and results from the previous SIU Audit readiness engagement.

Region	Institution
Atlantic	Atlantic Institution Nova Institution for Women
Quebec	Donnacona Institution Regional Reception Centre Port-Cartier Institution* Joliette Institution*
Ontario	Millhaven Institution Grand Valley Institution for Women*
Prairies	Bowden Institution* Edmonton Institution Edmonton Institution for Women Stony Mountain Institution Note: Saskatchewan Penitentiary was visited as part of the planning component of the engagement.
Pacific	Kent Institution Fraser Valley Institution*

\*These five institutions were visited only for the evaluation component of the engagement.



**Interviews** with more than 240 participants were conducted from May to November 2023.

During institutional visits, 28 interviews were conducted with current SIU inmates and Chairs of Inmate Welfare Committees.

Over 200 interviews were conducted with management and staff who are involved with the SIUs at the Institutional levels. Staff positions that were interviewed included: Wardens, Deputy Wardens, Assistant Warden Interventions, Assistant Warden Operations, Correctional Managers, SIU Managers/Managers Assessment and Interventions, Correctional Officers/Primary Workers, Parole Officers, Social Program Officers, Security and Intelligence Officers, Elders, Correctional Program Officers, Behavioural Counsellors/Behavioural Skills Coaches, Teachers, Maximum Unit Nurses, Mental Health Nurses, Chiefs of Mental Health, and SIU Data and Activity Coordinators.

Institutions were provided a list of positions the joint audit and evaluation team wished to interview, and participants were selected by institutional management.

Interviews were also conducted with staff at the national and regional levels.

Informal, ad-hoc conversions also took place.

## Appendix F: Scope and Approach (2 of 2)



**Document and literature review** of internal and external reports and documents, and scholarly articles, including:

- legislation and policy instruments;
- corporate documents, job descriptions, locally produced documents and email communications;
- procedural documents such as process maps; and
- monitoring and reporting information.

The reviews covered the period between November 2019 to January 2024.



**Administrative data analysis** of internal databases, extracted by Performance Measurement and Management Reports (PMMR) and Health Service.

The data sets covered the period between April 1, 2016 to April 29, 2024. Each data set contains year end snapshot data. They include:

- Electronic Medical Record System (EMRS);
- Health Accreditation Reporting System (HARS);
- Human Resource Management System (HRMS);
- Offender Management System (OMS);
- Performance Direct (PD);
- Scheduling and Deployment System (SDS); and
- Long-Term Evolution-Structured Intervention Unit (LTE-SIU).

Given the source of data differs, analysis was carried out in isolation of each other and not linked by individual inmates.



**File Review and testing** of over 1,400 inmate-related files and data records was performed.

Files covered the period between October 2021 and November 2023.

The key SIU case management documents examined included:

- Structured Intervention Unit Correctional Plan Update (SIU-CPU);
- Correctional Plan Update (CPU);
- Assessment for Decision (A4D); and
- Program Performance Report for the Motivational Module.

The decision and review documents examined included:

- SIU authorizations;
- institutional head 5-working day SIU transfer decision;
- SIU Review Committee recommendation;
- institutional head 30-day SIU transfer decision;
- regional review;
- Senior Deputy Commissioner review and decision; and
- information and decision sharing documentation.

Data records were examined through the LTE-SIU application and tracking sheets.

Many different factors were considered when selecting samples to review, including but not limited to:

- gender;
- race;
- institution;
- health needs;
- number of SIU placements;
- length of SIU placement; and
- timing and length of SIU placement.

## Appendix G: Legislation and Policy Framework

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### Legislation

There are specific legislative requirements that guide the operationalization of SIUs and the management of its inmates. The following sections are specific to, or relate to, SIUs:

- *Corrections and Conditional Release Act (CCRA)*

The act governs the detention and conditional release of inmates, and the following sections apply to SIUs: 15.1, 29, 31-37.91, 78, 80, 86, 87, 96. Additionally, section 79 (1) of the CCRA states that CSC must take Indigenous Social History into consideration when making any decisions affecting an Indigenous inmate.

- *Corrections and Conditional Release Regulations (CCRR)*

The regulations provide details guiding the interpretation or application of the CCRA and the following sections apply to SIUs: 5(1), 6(c), 16(b), 19-23.07, 97.

- *Criminal Code of Canada (CCC)*

Although there are no sections specific to SIUs, section 718.2(e) of the *Criminal Code*, as well as the Supreme Court of Canada in *R. v. Gladue* (1999) 1 S.C.R states that the unique circumstances of an Aboriginal inmate, as described in the definition of the Aboriginal Social History, as well as culturally appropriate/restorative options must be taken into consideration in decisions regarding Indigenous inmates. The Ontario Court of Appeal clarified that Aboriginal Social History should be considered not only during sentencing but throughout the entire justice process (e.g., *R v. Sim*, 2005).

### CSC Policy Instruments

CSC's policy devoted to SIUs is Commissioner's Directive (CD) 711.

The purpose of CD 711 is to ensure an inmate's transfer to an SIU is used as the least restrictive measure necessary and for the shortest time possible, consistent with the protection of society, staff and inmates, when there are no reasonable alternatives that could address the inmate's risk and to ensure an effective correctional planning process that responds to the inmate's specific need and risk.

In addition, requirements applicable to SIUs are included in the following policy instruments:

- Commissioner's Directive 702 Indigenous Offenders;
- Guidelines 711-1 Structured Intervention Unit (SIU) Transfer Procedures – SIU Sites;
- Guidelines 711-2 Structured Intervention Unit (SIU) Transfer Procedures – Non-SIU Sites; and
- Interim Policy Bulletins 646, 649, 660, 679, 690, and 698.

This policy suite is currently under review.



## Appendix H: Statement of Conformance

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This internal audit engagement was conducted in conformance with *the International Standards for the Professional Practice of Internal Auditing*, the Treasury Board of Canada *Policy on Internal Audit*, and the Treasury Board of Canada *Directive on Internal Audit*, as supported by the results of the Quality Assurance and Improvement Program of Correctional Service of Canada.

**Daniel Giroux, CIA**

Chief Audit and Evaluation Executive