Prisoners' Legal Services

A Project of the West Coast Prison Justice Society

December 17, 2021

<div align="right">VIA EMAIL</div>

Anne Kelly, Commissioner
Correctional Service Canada
340 Laurier Avenue West
Ottawa, Ontario
K1A 0P9

Dear Commissioner Kelly:

Re: Correctional officers cutting clothes off incarcerated people
Correctional officers on living units at Regional Treatment Centres

I am writing to request that the Correctional Service Canada amend its policy on two issues: the first relates to correctional officers cutting people's clothes off, and the second relates to correctional officers being present on living units at Regional Treatment Centres.

Cutting off clothing

We ask that you initiate a change to policy that would prohibit correctional officers from cutting clothes off of people in prison. We have heard reports of this happening when someone is placed in an observation cell when they are at risk of suicide or self-harm.

Many people in prison are survivors of sexual abuse, and having your clothes cut off, against your wishes and often violently during a "use of force" and strip search, is extremely traumatizing for anyone, and is re-traumatizing for anyone who has experienced sexual abuse. It is sexual assault. CSC should prohibit correctional officers from cutting people's clothes off in any circumstance.

I understand the purpose may be to ensure the person is not concealing anything they could use to harm themselves, or to force them to change into a suicide smock. However, if the person is in an observation cell, they would be continually observed, and staff could continue to encourage them to change voluntarily. The harm of experiencing this sexual violence outweighs any potential harm of not cutting someone's clothes off. Further, this practice is out of line with the *Corrections and Conditional Release Act*'s emphasis on penitentiaries being "free of practices that undermine a person's sense of personal dignity" (s 70). BC Corrections has banned the practice and CSC should follow suit.

Correctional officers at Regional Treatment Centres

We also ask that you amend policy to prohibit correctional officers from being routinely present on living units in Regional Treatment Centres. Many people who end up in Regional Treatment Centres have experienced isolation and trauma, including uses of force by correctional officers. Many suffer the symptoms of Post-Traumatic Stress Disorder, which includes "severe emotional distress or physical reactions to something that reminds you of the traumatic event…negative thoughts about yourself, other people or the world, hopelessness about the future… lack of interest in activities… difficulty experiencing positive emotions…always being on guard for danger, self-destructive behaviour… irritability, angry outbursts or aggressive behaviour," among other symptoms (see https://www.mayoclinic.org/diseases-conditions/post-traumatic-stress-disorder/symptoms-causes/syc-20355967).

Many of our clients report that interactions with correctional officers cause them emotional distress. This undermines what should be a therapeutic environment for people with serious mental health disabilities. Having correctional officers on the units where people live prevents them from benefiting from any therapeutic services that might be available to them.

We suggest that correctional officers not be permitted on living units in regional treatment centres unless health care staff call them for assistance. This is the practice at the Forensic Psychiatric Hospital in BC, where there are only six security officers for 190 patients. The security officers do not carry weapons and do not go on the living units unless called by healthcare staff.

Thank you for considering these amendments. Please feel free to contact me if you would like to discuss these ideas.

Yours truly,

PRISONERS' LEGAL SERVICES

Jennifer Metcalfe
Executive Director
Barrister and Solicitor