



Government of **Western Australia**
Department of **Health**

Your Ref: Prison Inquiry
Our Ref: EHB-00139/03 EHB14/2821
Contact: Vic Andrich
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Project Manager
Economic Regulation Authority
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Dear Sir/Madam

**INQUIRY INTO THE EFFICIENCY AND PERFORMANCE OF WESTERN
AUSTRALIAN PRISONS – COMMENT ON ISSUES PAPER**

Further to the notice of the above, the Department of Health comments are provided on the attachment.

Should you have queries or require further information please contact Vic Andrich on 9388 4978 or vic.andrich@health.wa.gov.au

Yours sincerely

Dr Michael Lindsay
ACTING DIRECTOR
ENVIRONMENTAL HEALTH DIRECTORATE

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Department of Health – Submission on Prison Inquiry

DOH – Department of Health; DCS – Department of Corrective Services

Issues Paper - Prison Inquiry		
Heading	Question	Comment
1.0	The Prison System in Western Australia	
1.1	Do you agree that prisons are more expensive to run in Western Australia? If not, why not?	<ul style="list-style-type: none"> • Yes
1.2	If yes, what are the specific factors that result in Western Australian prisons being more expensive to run (in terms of cost per prisoner per day) compared to other States? Are any of these factors within the control of the Government, the prison system or individual prison operators?	<ul style="list-style-type: none"> • The regional and semi-rural location of the majority of WA prisons can reduce access to standard infrastructure. This can require provision, and a cost burden, by the DCS. Facilities isolated from public infrastructure services may have to collect, treat, store and provide potable water and operate sewage treatment/disposal plants. Safe disposal may include reuse, which requires further treatment, sampling and monitoring costs.
5.0	Performance frameworks	
5.1	Are there components that should be included in a performance framework in addition to service standards, incentives and performance monitoring? What are these components and why should they be included?	<ul style="list-style-type: none"> • The Issues paper acknowledges that performance indicators are largely based on security and safety. However, safety is not just a reflection of physical and mental health protection factors. Environmental Health within the prison system also needs to be recognized through the provision of safe housing, living, recreational and work places for both inmates and staff. This extends to the in house operation of potable water and safe sewage treatment and disposal systems at some locations. <p>It is important that schemes are operated in accordance with the undertakings/information given in applications for approval (eg expected occupancy loadings) and Conditions of Approval (eg: where, when and how recycled water may be applied). Attention should be given to these during the shutting down and then re-commissioning of plant eg: reopening of Pardelup and population fluctuations at work camps.</p> <p>However, the ongoing operation of plant may be overlooked or required levels of attention may not be given to its safe operation, if this is not specified in a score card, listed as a performance indicator, used as a benchmark - or otherwise be seen to be deemed as having a value or incentive to justify allocating resources and expenditure to.</p>

8.0	Performance monitoring		
8.3		How should performance benchmarks be selected?	<ul style="list-style-type: none"> • On-going compliance with statutory approvals and conditions of approval should be included. • Systems could be compared for meeting sampling frequency and quality compliance.
9.0	Institutions and governance arrangements		
9.6		Do you have any further comments on improving governance and decision-making in the Western Australian prison system?	<ul style="list-style-type: none"> • Staff movement, service provider contract changes, staff changes at 3rd party service providers etc can lead to a loss of knowledge about conditions of approval for infrastructure. • Systems need to be in place to ensure knowledge is transferred and approval documents are maintained and accessible.
10.0	Factors affecting prison performance		
10.4		What factors influence the achievement of the incapacitation objective? How do they influence incapacitation?	<ul style="list-style-type: none"> • Nil • The competent operation of infrastructure may not be one of the 4 identified objectives, but it underpins the capacity to keep a prison open
12.0	Incentives in the prison system		
12.2		What are the main risks associated with the private sector operating prisons on a for-profit basis? How might these risks be managed?	<ul style="list-style-type: none"> • Water and sewage schemes may be internally developed or the construction project outsourced, and the operation and maintenance could even be further contracted to a third party. Regardless of installation and operational responsibilities, there is still an obligation on the State to ensure that inmates and staff are not exposed to unacceptable risks through the provision or operation of these services.